

Lambeth Site Allocations DPD – Proposed Submission Version

Regulation 19 Evidence

Heritage Impact Assessment for Westminster World Heritage Site



September 2023

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1. Introduction

- 1.1 This Heritage Impact Assessment (HIA) has been prepared as part of the evidence to support Lambeth's Site Allocations Development Plan Document – Proposed Submission Version (SADPD PSV) in relation to Site 1 – Royal Street and Site 2 St Thomas' Hospital due to their geographical proximity to The Palace of Westminster and Westminster Abbey including St Margaret's Church World Heritage Site. For simplicity within the document the World Heritage Site is referred to as the Westminster World Heritage Site (WWHS).
- 1.2 The location of Site 1 and Site 2 within the wider setting of the WWHS and their visibility in views out of the WWHS is the reason for the preparation of this HIA. It has been u with reference to UNESCO's Guidance and Toolkit for Impact Assessments in World Heritage Context (2022) which describes HIA's as:

'project-specific assessments that focus on the potential effect on a heritage place's OUV and other heritage/conservation values. In the context of World Heritage properties, a Heritage Impact Assessment should focus on identifying and assessing negative and positive impacts on the attributes which convey the Outstanding Universal Value of the World Heritage property.'

- 1.3 In relation to setting the guidance states:

Every World Heritage property is surrounded by a wider setting, which is the immediate and extended environment that is part of, or contributes to, its significance and distinctive character. It may relate to the property's topography, natural and built environment, and other elements such as infrastructure, land use patterns, spatial organization and visual relationships. It may include related ecological and hydrological connectivity, social and cultural practices, economic processes and other intangible dimensions of heritage such as perceptions and associations. The wider setting might also play an essential role in protecting the authenticity and integrity of the property, and its management is related to its role in supporting the Outstanding Universal Value.

- 1.4 This assessment, and the background work that has informed its preparation, has been undertaken by Lambeth's in-house Conservation & Design team.

World Heritage Sites

- 1.5 World Heritage Sites are recognised under the World Heritage Convention to be of Outstanding Universal Value (OUV) through inscription on the World Heritage List. To be included on the List, properties must meet at least one of ten criteria of OUV along with requirements for authenticity, integrity, and protection and management. The criteria of OUV are:

i. represent a masterpiece of human creative genius;

ii. exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;

iii. bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

iv. be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;

v. be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change;

vi. be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance. (The Committee considers that this criterion should preferably be used in conjunction with other criteria);

vii. contain superlative natural phenomena or areas of exceptional natural beauty and aesthetic importance;

viii. be outstanding examples representing major stages of earth's history, including the record of life, significant on-going geological processes in the development of landforms, or significant geomorphic or physiographic features;

ix. be outstanding examples representing significant on-going ecological and biological processes in the evolution and development of terrestrial, freshwater, coastal and marine ecosystems and communities of plants and animals; and/or

x. contain the most important and significant natural habitats for in-situ conservation of biological diversity, including those containing threatened species of Outstanding Universal Value from the point of view of science or conservation.

1.6 UNESCO definitions of the three requirements are set out below:

Authenticity *applies to cultural heritage, and refers to the degree to which knowledge and understanding of the property's heritage values are understood and believed to be credible: whether their cultural values are truthfully and credibly expressed through attributes including form and design; materials and substance; use and function; traditions, techniques and management systems; location and setting; language and other forms of intangible heritage; spirit and feeling; and other internal and external factors.*

Integrity *is a measure of the wholeness and intactness of the natural and/or cultural heritage and its attributes: the extent to which the property includes all elements necessary to express its Outstanding Universal Value; whether it is of adequate size to ensure the complete representation of the features and processes which convey the property's significance; and whether it has been protected from adverse effects of development and/or neglect.*

Protection and management *relates to how a property's Outstanding Universal Value, including its integrity and/or authenticity, are sustained and enhanced over time.*

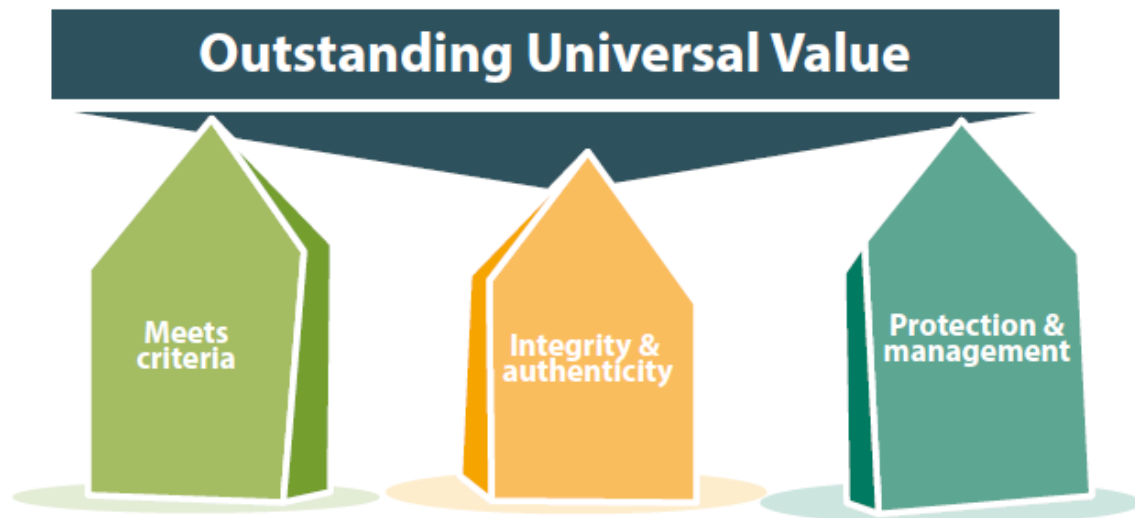


Figure 1 – the pillars that make up OUV. Taken from the UNESCO’s 2022 guidance and shows how OUV is made up of three equal ‘pillars’.

- 1.7 The OUV of each WHS is defined at the time of inscription in a Statement of OUV. Heritage Impact Assessments are used to consider proposals located within a WHS or affecting its setting or buffer zone (where relevant) for their potential impact on its OUV, its integrity and its authenticity which are also set out in the Statement of OUV.

World Heritage Committee

- 1.8 The World Heritage Committee is an intergovernmental body which maintains the World Heritage List. The Convention is also supported by a Secretariat (the UNESCO World Heritage Centre) and has three Advisory Bodies (ICCROM, ICOMOS and IUCN). The World Heritage Committee meets annually to oversee and guide the implementation of the Convention. This includes deciding which properties are added to /or removed from the World Heritage List. The Committee can arrange fact-finding missions to World Heritage Sites by its Advisory Bodies and examines reports on the state of conservation of properties inscribed on the World Heritage List.

Westminster World Heritage Site Management

- 1.9 The Site falls within the City of Westminster who’s Local Planning Authority oversee all aspects of plan making and decision making. A Steering Group of stakeholders is managed Westminster’s Planning team but has no formal powers.

2. The Outstanding Universal Value of the World Heritage Site, including authenticity and integrity

Introduction

- 2.1 The Palace of Westminster and Westminster Abbey including Saint Margaret's Church World Heritage Site was inscribed on the World Heritage List in 1987 and the boundary was modified in 2008. See Figure 2 (below). It is located within the City of Westminster. A brief synthesis of the OUV can be found here - <https://whc.unesco.org/en/list/426/>. A Management Plan for the WWHS was adopted in 2008.

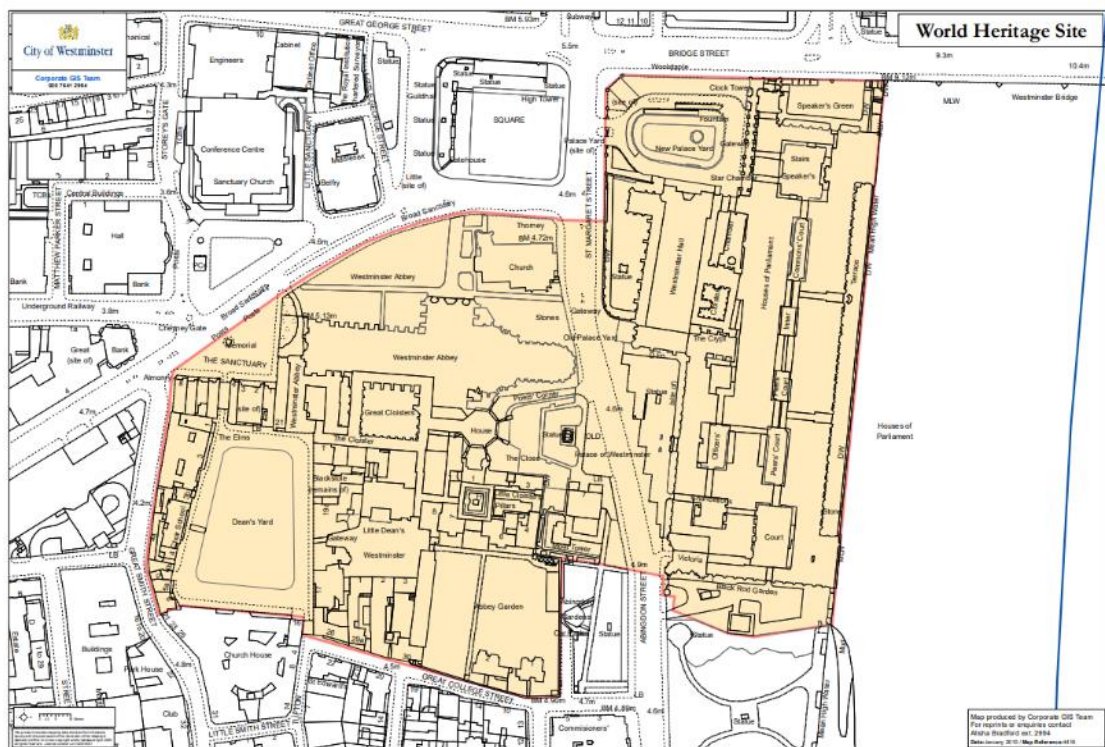


Figure 2 Map showing WHS boundary (Source City of Westminster).

Outstanding Universal Value

2.2 The UNESCO website states that the WWHS meets the following criteria of OUV:

Criteria	Description taken from the Management Plan (2008) (pages 90-91)
<i>i. represent a masterpiece of human creative genius;</i>	Criterion 1 – Westminster Abbey is a unique artistic construction representing a striking sequence of the successive phases of English Gothic art.
<i>ii. exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;</i>	Criterion 2 – Other than its influence on English architecture during the Middle Ages, the Abbey has played another leading role by influencing the work of Charles Barry and Augustus Welby Pugin at Westminster Palace, in the “Gothic Revival” of the XIX century.
<i>iv. be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;</i>	Criterion 4 – The Abbey, the Palace and St Margaret’s illustrate in a concrete way the specificities of parliamentary monarchy over as long a period of time as nine centuries. Whether one looks at the royal tombs of the chapterhouse, the remarkable vastness of Westminster Hall, of the House of Lords or of the House of Commons, art is everywhere present and harmonious, making a veritable museum of the history of the United Kingdom.

2.3 In addition, the Management Plan (page 90) identifies an additional criteria:

Criteria	Description taken from the Management Plan (2008)
<i>Criterion (vi) to be directly associated with events or living tradition with ideas or with beliefs, with artistic and literary works of outstanding universal significance.</i>	None provided

Integrity

2.4 The UNESCO website states:

'The property contains the key attributes necessary to convey its Outstanding Universal Value. In 2008 a minor boundary modification was approved to join the existing component parts of the property into a single ensemble, by including the portion of the road which separated them. There are associated attributes outside the boundary, which could be considered for inclusion in the future, and this will be examined during the next Management Plan review.

The instantly recognisable location and setting of the property in the centre of London, next to the River Thames, are an essential part of the property's importance. This place has been a centre of government and religion since the days of King Edward the Confessor in the 11th century and its historical importance is emphasised by the buildings' size and dominance. Their intricate architectural form can be appreciated against the sky and make a unique contribution to the London skyline.

The distinctive skyline is still prominent and recognisable despite the presence of a few tall buildings as part of the property. The most prominent of these, Milbank Tower and to some extent Centre Point - now protected in their own right - were both extant at the time of inscription. However important views of the property are vulnerable to development projects for tall buildings. Discussions have begun and are ongoing on how to ensure that the skyline of the property and its overall prominence

is sustained, and key views into, within and out of the property are conserved. The main challenge is agreeing on a mechanism to define and give protection to its wider setting. Until agreement can be reached on this, the integrity of the site is under threat.

The buildings are all in their original use and are well maintained to a high standard. There has been little change to the buildings since the time of inscription although external repairs continue and security measures have been installed at the Palace of Westminster.

The heavy volume of traffic in the roads around the property does impact adversely on its internal coherence and on its integrity as a single entity.'

- 2.5 The Management Plan (2008) identifies the following areas of significance which contribute to the integrity of the WWHS: Symbolic and Spiritual Significance, Political Significance, Historic Significance, Architectural Significance, Works of art, fittings, furnishings and archives, Intellectual Significance, and Public Significance.

Authenticity

- 2.6 The UNESCO website states:

'The power and dominance of state religion, monarchy and the parliamentary system is represented tangibly by the location of the buildings in the heart of London next to the River Thames, by the size of the buildings, their intricate architectural design and embellishment and the high quality materials used. The Palace of Westminster, the clock tower and "Big Ben's" distinctive sound have become internationally recognised symbols of Britain and democracy. All the buildings maintain high authenticity in their materials and substance as well as in their form and design.

The property maintains its principal historic uses and functions effectively. The Gothic Westminster Abbey, a working church, continues to be used as a place of daily worship. It remains the Coronation church of the nation and there are frequent services to mark significant national events as well as royal weddings and funerals and for great national services. Many great British writers, artists, politicians and scientists are buried or memorialised here. The Palace of Westminster continues to

be used as the seat of the United Kingdom's two-chamber system of democracy. St Margaret's Church, now part of Westminster Abbey, remains at heart a medieval parish church, ministering to Members of both Houses of Parliament.'

Components of WWHS

- 2.7 The Management Plan (page 17) states that the World Heritage Site comprises three main components: (A) The Palace of Westminster, including the Jewel Tower, (B) Westminster Abbey including St Margaret's Church and (C) Westminster School. Their approximate locations are shown on Figure 3 below.

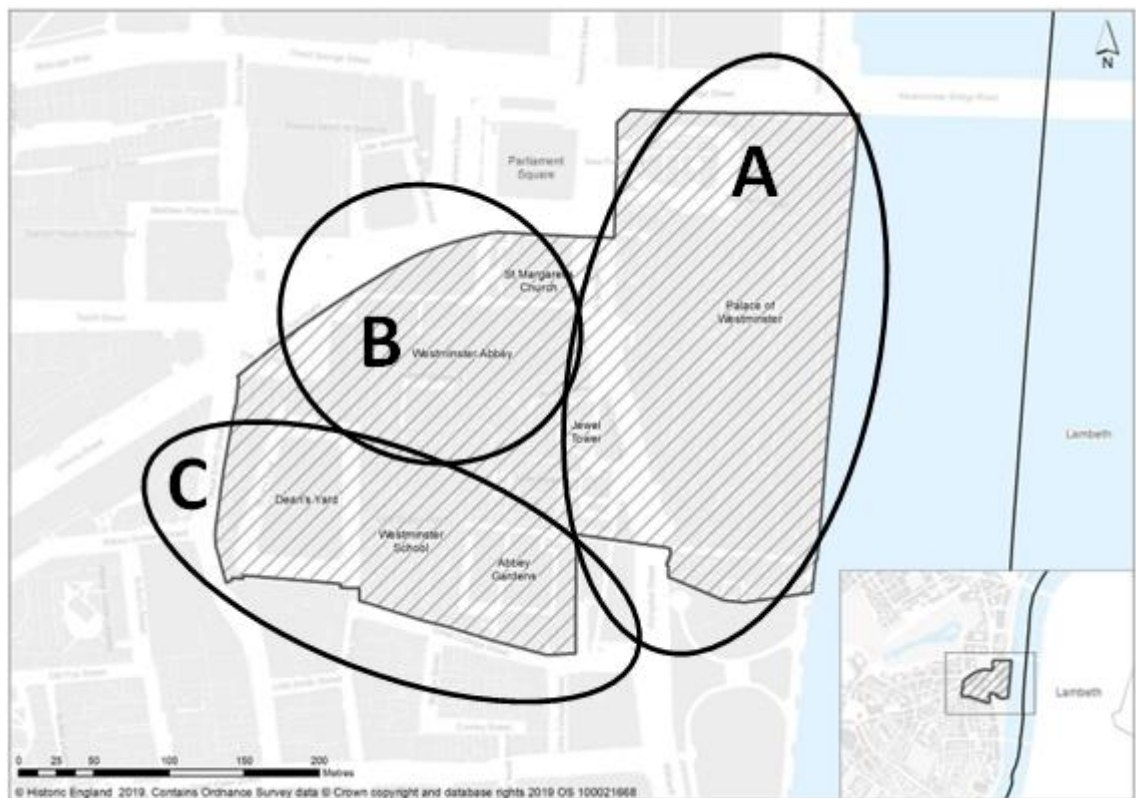


Figure 3 - Map showing the three component parts of the WWHS (Base map source from Westminster City Plan 2019-2040) with component parts overlaid by author.

Heritage Designations

- 2.8 The whole of the WWHS is within an Archaeological Priority Area (Lundenwic and Thorney Island).

- 2.9 The vast majority of the structures within the World Heritage Site are Grade I, Grade II* or Grade II Listed.
- 2.10 The whole of the WWHS is within the Westminster Abbey and Parliament Square Conservation Area.

Protected Views

- 2.11 Important views of the WWHS are identified in a range of documents.
- 2.12 Strategic Views of the WWHS are set out in the London Plan (2021). The relevant views are:

Strategic View No.	Strategic View Name
View 2	London Panorama: Parliament Hill
View 4	London Panorama: Primrose Hill
View 15	River Prospect: Waterloo Bridge
View 17	River Prospect: Golden Jubilee Footbridges
View 18	River Prospect: Westminster Bridge
View 19	River prospect: Lambeth Bridge
View 21	River Prospect Thames side in front of County Hall (HP Sauce bottle view)
View 22	River Prospect: Albert Embankment
View 27	Townscape View: Parliament Square to Palace of Westminster

Table 1 – Strategic Views relating to the WWHS.

2.13 Relevant local views, designed by Local Planning Authorities, are set out in the table below:

View number	View Name	Note
WWHS Management Plan Views		
Page 62 contains a map with view locations marked. These are neither named nor numbered. The names and numbers below have been added by the author for clarity.		
MP1	Views from London Eye	
MP2	View from Lambeth end of Westminster Bridge	
MP3	Views from north-east corner of Parliament Square	
MP4	Views from north-west corner of Parliament Square	
MP5	Westminster Abbey and St Margarets Church from the east side of St Margaret's Street	
MP6	Westminster Abbey's towers from Tothill Street / Victoria Street corner	
MP7	View from north-west corner of Deans Yard	
MP8	Westminster Abbey from the cloister	
MP9	View within the Abbey's little cloister	
MP10	View of Abbey across College Garden	
MP11	View north from Abingdon Gardens	
MP12	View from Victoria Tower Gardens	
MP13	View from east end of Lambeth Bridge	This duplicates Strategic View 19.
Westminster City Council Views		

Sources for views below are 'Westminster City Council City Plan, 2019-40 Views Background Paper (June 2019)' and 'Metropolitan View Draft SPD (2007).'

V14	Palace of Westminster from River / Lambeth Palace	
V15	Palace of Westminster from centre of Westminster Bridge	This duplicates Strategic View 18.
V16	Palace of Westminster from Golden Jubilee Bridge	This duplicates Strategic View 17.
V17	Victoria Embankment to Palace of Westminster Clock Tower	
V37	Parliament Square Views	This duplicates Strategic View 27B.
V38	Westminster Abbey from Tothill St.	
V40	Big Ben Clock Tower from the bottom of Constitution Hill	

Westminster Abbey & Parliament Square Conservation Area Audit (2008)

Local View 1	Methodist Hall, The Sanctuary, main west doors and towers of Westminster Abbey and St Margaret's Church viewed from broad Sanctuary	
Local View 2	Westminster Abbey's towers from Tothill Street / Victoria Street corner	This duplicates View MP6
Local View 3	Westminster abbey from the north side of Victoria Street	
Local View 4	Westminster Abbey and Parliament Square from The Sanctuary	
Local View 5	Methodist Central Hall from outside Westminster Abbey	
Local View 6	Middlesex Guildhall and World Heritage Site from lawn outside Westminster Abbey	
Local View7	World heritage Site from north gate of Westminster Abbey	

Local View 8	World Heritage Site from west side of Parliament Square	
Local View 9	World Heritage Site from corner of Great George Street	This duplicates Strategic View 27B
Local View 10	World Heritage Site from north-west corner of Parliament Square	
Local View 11	World Heritage Site from west side of Parliament Square	This is a duplicate of View 8
Local View 12	World Heritage Site from south-west corner of Parliament Square	
Local View 13	World Heritage Site from the west side of Parliament Street at junction with parliament Square	This duplicates Strategic View 27
Local View 14	World Heritage Site from east side of Parliament Street at the junction with Parliament Square	
Local View 15	World Heritage Site and Whitehall from north-east corner of garden in parliament Square	
Local View 16	World Heritage Site from north gate of Westminster Abbey	
Local View 17	World Heritage Site from Westminster Abbey and St Margaret's Church from south-east corner of garden in parliament Square	
Local View 18	Parliament Square and Westminster Abbey and St Margaret's Church from north entrance to the Houses of Parliament on east side of Parliament Square from	
Local View 19	Houses of Parliament form East end of St Margaret's Church	
Local View 20	Westminster Abbey and St Margarets Church from the east side of St Margaret's Street	This duplicates view MP5

Local View 21	Houses of Parliament from apse of Westminster Abbey	
Local View 22	Westminster Abbey Chapel, Westminster Hall and Old Palace Yard from outside nos. 6 – 7 Old Palace Yard	
Local View 23	Victoria Tower from outside Jewel Tower	
Local View 24	Jewel Tower, St Stephen’s porch, Westminster Hall and Victoria Tower from Abingdon Gardens	
Local View 25	Dean’s yard viewed from porch of Church House looking north	
Local View 26	Dean yard viewed from north-west corner	
Local View 27	Great Cloisters from south-west corner	
Local View 28	Burlington Dormitory and southern buildings of Little Cloisters for south-westerly corner of Abbey Gardens	
Local View 29	Little Cloisters from Dark Cloisters	
Local View 30	Victoria Tower and southern façade of Palace, and river embankment from Victoria Tower Gardens	
Local View 31	Victoria Tower and the southern façade of Palace, Victoria Tower Gardens, the River Thames and the South Bank Conservation Area (Borough of Lambeth) from River Embankment.	
Local View 32	Victoria Tower, the River Thames and the South Bank Conservation Area (Borough of Lambeth) from Lambeth Bridge.	
Local View 33	Palace of Westminster from Lambeth Bridge)	This duplicates Strategic View 19.
Local View 34	View upriver from Westminster Bridge	This duplicates Strategic View 18.
Local View 36	North Entrance of Westminster Abbey from north gate	

Local View 37 Greta College Street, including the Thorney Island boundary wall, viewed from the corner of Little College Street

Lambeth Council Views (from Policy Q25 Lambeth Local Plan, 2021)

Landmark	View NW from Lambeth Palace terrace to
Silhouette viii	Houses of Parliament (including Victoria Tower);
ix	View W from Lambeth Palace’s garden to the Houses of Parliament (Victoria Tower) as viewed through the gap between St Thomas Hospital building and the Guy’s and St Thomas’ Medical School building
x	View NNW from Kennington Lane along Courtenay Street to Houses of Parliament (Elizabeth Tower)
xi	View W from St Thomas’ Hospital garden to Westminster World Heritage Site and Westminster Bridge.

Albert Embankment Conservation Area Character Appraisal (2017)

Immediate Setting of WWHS within Lambeth	This is a defined area in Lambeth where a visual appreciation of the WWHS can be gained from public places (including on the river, parts of Jubilee Gardens and the Garden of St Thomas’ Hospital.	It extends from Vauxhall Bridge to Westminster Bridge within the Albert Embankment CA and then continues from Westminster Bridge to Waterloo Bridge within the Southbank CA.
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Table 2 – Local Views relating to the WWHS.

2.14 The WWHS Management Plan (2008) describes the more general view towards Lambeth but attributes the visible features no value:

'1.7.11.2 Views from the WHS and adjacent riverside embankments to Lambeth are dominated by the tree-lined Embankment and three particular and distinctly individual buildings: County Hall, the complex forming the St. Thomas' Hospital site and Lambeth Palace.'

Buffer Zone

- 2.15 A buffer zone is defined by the UNESCO guidance as *'an area surrounding the property which has complementary legal and / or customary restrictions placed on its use and development in order to give an added layer of protection to the property'*. The WWHS does not have a buffer zone.

3. Contribution made to the Outstanding Universal Value of the World Heritage Site by its Setting

3.1 This section explains the setting of the WWHS where it is relevant to the Lambeth Site Allocations.

3.2 The study area that informed the preparation of the WWHS Management Plan (2008) encompassed land beyond the WWHS boundary on each side. To the east it included the River Thames, Westminster Bridge, County Hall, St Thomas' Hospital, the Lambeth Palace complex, and Lambeth Bridge. See Figure 4. Given the location of the two proposed site allocation sites within Lambeth borough, this eastern side is the focus of the assessment in this section.



Figure 4 Map of the study area that informed the WWHS Management Plan (Source page 6 WWHS Management Plan) with the boundary of the WWHS added by the authors for clarity.

- 3.3 The Management Plans' eastern study area captures a range of sites and heritage assets. These are explored in detail below.

River Thames

- 3.4 The table below capture what the various relevant documents state about its contribution to the OUV / significance of the WWHS.

WHS Management Plan (2008)	<p>1.3.2.2 The river frontage of the building is the most impressive elevation both by day and when lit at night. It was particularly designed to be appreciated from the South Bank and Westminster Bridge.</p> <p>1.6.4 Particularly famous views of features include:</p> <ul style="list-style-type: none">• The river frontage of the Palace of Westminster from Albert Embankment, Westminster and Lambeth Bridges. <p>1.6.4.4 The main river frontage of the Palace of Westminster and Westminster Bridge as a complete composition can now be appreciated from a viewing platform on new Hungerford Pedestrian Footbridge (from 2 July 2003 as the Queen's Golden Jubilee Bridge).</p> <p>1.7.11.1 On the opposite side of the Thames, is the Embankment, linking the Westminster and Lambeth Bridges, which together provide a series of viewpoints across the Thames to the river façade of the Palace of Westminster, and to the Abbey beyond. The embankment walk is a popular viewing destination for tourists.</p>
Westminster Abbey & Parliament Square	<p>Page 26 Character Summary: Importance of the River Thames to setting.</p>

Conservation Area Audit
(2008)

4.24 Although not visible from much of the conservation area, the **river** to the east is also extremely important as the largest open space in the area, providing an expansive and open setting for the Palace and long views into and out of the area.

6.18 Much of the conservation area is made up of open spaces, as outlined above. The green open spaces and the **river** are vital to the character of the area.

Albert Embankment
Conservation Area Character
Appraisal (2017)

2.23 The location of the conservation area across the **river** from the Westminster World Heritage Site (WWHS), the Westminster Abbey and Parliament Square Conservation Area, Smith Square Conservation Area, Millbank Conservation Area allows it to have excellent views of these heritage assets. Indeed, the Albert Embankment Conservation Area contains the best location from which appreciate the iconic Palace or Westminster.

2.32 Proceeding northward the Palace of Westminster and Lambeth Bridge become more prominent in the view and their detailing is more discernible. So too does the relatively low-rise development along the Millbank and Victoria Embankment which provide its setting. North of the WWHS, on the north bank of the **River** Thames and the picturesque roofscapes silhouetted against clear sky add much to the experience of the setting of the WWHS.

2.41 This area [Albert Embankment north of Lambeth Bridge] is a popular location with people and television news crews who come to appreciate the excellent view the Palace of Westminster.

2.44 Albert Embankment terminates at Westminster Bridge. This is an excellent location to appreciate the

bridge structure itself, the WWHS and, especially, the Elizabeth Tower. Photographers regularly congregate here as a result. An under-pass doglegs under Westminster Bridge northward (into the Southbank Conservation Area) and broad steps lead up to Westminster Bridge itself. These steps and bridge too provide an excellent viewing place for WWHS.

2.142 ...The view from Victoria Tower Gardens with **river** [in] the foreground and canopy of mature trees pierced by the roofline of the historic buildings is the only place where the [architectural] composition of the historic St Lambeth Palace complex can be fully appreciated.

Summary of the contribution made to the OUV / Significance of the WWHS by the River Thames

Located immediately east of the WWHS boundary and extending north and south. The River Thames, as the key transport route, played a vital role in the early development of Thorney Island on which the WWHS stands. The River plays a key role in the foreground (immediate setting) of the Palace of Westminster when viewed from the north, east and south. The Palace of Westminster was explicitly designed to be an impressive landmark in these views.

When it comes to views out of the WWHS, the River Thames plays a much lesser role in terms of its contribution to OUV. The River itself is not particularly visible from much of the WWHS and it is primarily its spatial role in providing an expanse of open space between the WWHS and other historic buildings that its significance is felt. The contribution of those buildings to the OUV is explored later in this section (see below). The contribution of the River Thames to the OUV of the WWHS is very high.



Figure 5 The River Thames makes a very high contribution to the setting of the WWHS.

Westminster Bridge

3.5 The table below capture what the various relevant documents state about its contribution to the OUV / significance of the WWHS.

Management Plan (2008) 1.6.4.2 Particularly famous views of features include:

- 'Big Ben' from all angles, in particular from Parliament Square, Westminster bridge and Albert Embankment....

1.6.4.4 The main river frontage of the Palace of Westminster and Westminster Bridge as a complete composition can now be appreciated from a viewing platform on new Hungerford Pedestrian Footbridge (from 2 July 2003 as the Queen's Golden Jubilee Bridge).

1.7.11.1 On the opposite side of the Thames, is the Embankment, linking the Westminster and Lambeth Bridges, which together provide a series of viewpoints across the Thames to the river façade of the Palace of Westminster, and to the Abbey beyond. The

embankment walk is a popular viewing destination for tourists.

Westminster Abbey &
Parliament Square
Conservation Area Audit
(2008)

4.102 The current Westminster Bridge dates from 1862 and is a road and foot traffic bridge over the River Thames between Westminster and Lambeth. It has seven arches and is in wrought iron, with Gothic detailing by Charles Barry. It is the oldest bridge in the central area of the River Thames

4.103 The bridge is predominantly green in colour, matching the colour of the leather seats in the House of Commons, which is on the side of the Palace of Westminster nearest the bridge.

Summary of the contribution made to the OUV / Significance of the WWHS by Westminster Bridge

Located abutting the north-east corner of the WWHS and aligned west to east.

Westminster Bridge is not particularly visible from within the WWHS other than views from Palace of Westminster and in this regard has a limited role in terms of its contribution to OUV in these views. The bridge is stylistically similar (gothic) to the Palace of Westminster, it was constructed around the same time (mid 19th Century) and the design was in part by the Palace's Architect – Sir Charles Barry. The green colour reflects that of the leather seats in the House of Commons. There is therefore a strong historic and architectural link which contributes to the OUV. When seen together the two have string group value. Perhaps the best example is the historic 'HP Sauce bottle' view (Strategic View 21). Additionally, Westminster Bridge provides an important public vantage point (Strategic View 18) from which to appreciate the Palace of Westminster's impressive eastern façade. Contribution to setting / OUV is very high.



Figures 6 and 7. Westminster Bridge makes a very high contribution to the setting of the WWHS.

Lambeth Bridge

3.6 The table below capture what the various relevant documents state about its contribution to the OUV / significance of the WWHS.

Management Plan (2008)	<p>1.6.4 Particularly famous views of features include:</p> <ul style="list-style-type: none">• The river frontage of the Palace of Westminster from Albert Embankment, Westminster and Lambeth Bridges. <p>1.7.11.1 On the opposite side of the Thames, is the Embankment, linking the Westminster and Lambeth Bridges, which together provide a series of viewpoints across the Thames to the river façade of the Palace of Westminster, and to the Abbey beyond. The embankment walk is a popular viewing destination for tourists.</p>
Westminster Abbey & Parliament Square Conservation Area Audit (2008)	<p>4.103 ...In contrast, the red of Lambeth bridge matches that of the seats in the house of Lords.</p> <p>4.104 Lambeth Bridge, opened in 1932, has a five-span steel arch, designed by engineer George Humphreys and architect Sire Reginald Blomfield. It is a road traffic and footbridge. There are obelisks to either end which are surmounted by stone pinecones, known to be a symbol of hospitality from Roman times.</p>

Summary of the contribution made to the OUV / Significance of the WWHS by Lambeth Bridge

Located some distance south of the south-eastern corner of the WWHS and aligned west – east. Lambeth bridge is not particularly visible from within the WWHS and in this regard has a limited role in terms of its contribution to OUV in these views. An ornate and attractive structure painted red in response to the leather seats of the House of Lords, it has high aesthetic value. It is highly visible in the foreground of the WWHS when approached from the south along Albert Embankment, and where the Bridge meets Lambeth Road. It enriches the WHS setting in these views. It provides an

important public vantage point (Strategic View 19) from which to appreciate the towers of Westminster Abbey and Palace of Westminster. Contribution to setting / OUV is high.



Figures 8 and 9 Lambeth bridge makes a high contribution to the setting of the WWHS.

The County Hall

3.7 The table below capture what the various relevant documents state about its contribution to the OUV / significance of the WWHS.

Management Plan (2008)	1.7.11.2 Views from the WHS and adjacent riverside embankments to Lambeth are dominated by the tree-lined Embankment and three particular and distinctly individual buildings: County Hall , the complex forming the St. Thomas' Hospital site and Lambeth Palace.
Westminster Abbey & Parliament Square Conservation Area Audit (2008)	No references
Southbank Conservation Area Statement (2007)	2.1.4County Hall, the first public building on the South Bank, was built to house the London County Council (LCC). It is said to have selected the site across the river from the Houses of Parliament as a symbolic gesture of independence from central government. Construction began in 1911 but the main block was only fully completed in 1933 with its complex expanded further on the plots to the rear between the 1930s and 1970s. County Hall changed the course of the whole area's development and led to proposals in the late 1930s to extend its riverside walk as far as Waterloo Bridge; however the outbreak of war prevented progress on this matter.

Summary of the contribution made to the OUV / Significance of the WWHS by The County Hall

Located across the river Thames north-east of the north-eastern corner of the WWHS boundary. County Hall is visible in views out of Parliament Square where it appears in the backdrop (wider setting of the Elizabeth Tower. This includes Strategic View. 27A. County Hall, like the Palace of Westminster, has a formal relationship with the River Thames and both buildings have a 'Members' terrace' on their river front. The historic role of County

Hall as the former seat of London government facing the seat of national government is also of note. Contribution to setting is high.



Figures 10 and 11 – The County Hall makes a High contribution to the setting of the WWHS.

Lambeth Palace

3.8 The table below capture what the various relevant documents state about its contribution to the OUV / significance of the WWHS.

WWHS Management Plan (2008)	<p>1.7.11.2 Views from the WHS and adjacent riverside embankments to Lambeth are dominated by the tree-lined Embankment and three particular and distinctly individual buildings: County Hall, the complex forming the St. Thomas' Hospital site and Lambeth Palace.</p> <p>1.7.13 Lambeth Palace</p> <p>1.7.13.1 The Palace is the official residence of the Archbishop of Canterbury. It is a complex of domestic buildings and gardens within a walled enclosure that dates from the 12th century. Despite repair after World War II bomb damage, the Palace remains one of London's most intact medieval buildings.</p> <p>1.7.13.2 The hall was rebuilt in 1660 – 1663, the original having been destroyed under the Commonwealth. The Chapel was badly damaged in the war and was rebuilt in 1955 by Seeley and Paget. The oldest part of the Palace, the undercroft, dates from the 13th century. The principal impression given by the Palace is of warm red brick, the gatehouse having a black brick diaper pattern, stone dressings and turrets, alongside the mellowed ragstone octagonal turreted tower of St. Mary's Church. The church now serves as the Museum of Garden History. Captain Bligh of the infamous HMS Bounty is buried in the churchyard.</p> <p>1.7.13.2 The river frontage of Lambeth Palace should be imagined in its original setting, on the Thames shore and approached across the water by boat, the west facing walls acting as a defence against floods. Today</p>
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<p>Westminster Abbey & Parliament Square Conservation Area Audit (2008)</p>	<p>the Palace is now divided from the river by the Victorian embankment and Lambeth Palace Road. No references</p>
<p>Albert Embankment Conservation Area Character Appraisal (2017)</p>	<p>1.6 The close proximity of the Westminster World Heritage Site and its historic connections to Lambeth Palace is a significant consideration in planning for the conservation area</p> <p>2.68 Block 9 (former King’s College Hospital Medical School) has a landmark campanile and fronts the road with a high brick boundary treatment of strong Victorian industrial character. Its low height at the southern end is dictated by a covenant which, it is understood, is in place to protect views between Lambeth Palace and the Palace of Westminster.</p> <p>2.138 The views and panoramas from within the conservation area form a key part of its character. The conservation area is uniquely placed in central London on the banks of the River Thames opposite the WWHS. There is historic significance here too in the fact one represents the heart of ‘the state’ and the Lambeth side (the adjoining Lambeth Palace Conservation Area) represents the home of the established church – The Church of England. This exceptional context creates numerous views and vistas of importance, international, national, city wide, borough and local importance.</p> <p>2.142 The river, the riverside parapet of Victoria Tower Gardens, [and] Lambeth Bridge (south side), make excellent view locations from which to appreciate the heritage assets and general character of the Albert Embankment, St Thomas’ Hospital and the Lambeth</p>

Lambeth Palace Conservation
Area Character Appraisal
(2017)

Palace complex (Lambeth Palace Conservation Area). The view from Victoria Tower Gardens with river in the foreground and canopy of mature trees pierced by the roofline of the historic buildings is the only place where the composition of the historic **Lambeth Palace** complex can be fully appreciated.

As the official seat of the Archbishop of Canterbury, Lambeth Palace represents 'Church' and as the seat of government the Palace of Westminster represents 'State'; this is exceptionally important to London and to the nation. Lambeth Palace is a complex of great significance both architecturally and historically; it contains elements dating from the early 12th century and still has a strong constitutional and physical relationship with the Palace of Westminster. This relationship has significantly influenced the development of the area over the centuries and many local buildings and projects have carried a connection with the Palace or former Archbishops of Canterbury

... The conservation area also looks out in part to London's exceptional river frontage which allows views of the Palace of Westminster which is the key landmark in the internationally significant Westminster World Heritage Site.

1.7 The close proximity of the Westminster World Heritage Site and its historic connections to Lambeth Palace is a significant consideration in planning for the conservation area.

2.12 In 1616 William Juxon rebuilt the Great Hall of the [Lambeth] Palace. A plan of 1648 shows the extent of the grounds to be just over 12 acres with an additional area added for a kitchen garden. In 1660, the Palace became the Archbishop of Canterbury's principal

residence. Since then, it has served as the location of the Archbishops' prerogative court, and is the home of the Archbishops' private library collection of books and manuscripts. It is now recognized as the symbolic centre of the governance of the Church of England. It is from the creation of this centre for religious worship that Lambeth Palace is of historic and cultural significance to Anglicans around the world.

2.86 Lambeth Palace is uniquely placed in central London on the banks of the River Thames opposite the Palace of Westminster. There is historic significance here too in the fact that the latter represents the heart of 'the state' and the former the home of the established 'church'

Summary of the contribution made to the OUV / Significance of the WWHS by Lambeth Palace

Located south-east from the south-eastern corner of the WWHS boundary on the opposite bank of the River Thames. There is a centuries old historic connection between Lambeth Palace (as the official London residence of the Established Church's most senior cleric) and Palace of Westminster as the state legislature. Both buildings have a visual relationship and similar architectural characteristics. Contribution to setting / OUV of the WWHS is very high.



Figures 12, 13 and 14 Lambeth palace makes a very high contribution to the setting of the WWHS.

St Thomas' Hospital

3.9 The table below capture what the various relevant documents state about its contribution to the OUV / significance of the WWHS.

WWHS Management Plan (2008)	1.7.11.2 Views from the WHS and adjacent riverside embankments to Lambeth are dominated by the tree-lined Embankment and three particular and distinctly individual buildings: County Hall, the complex forming the St. Thomas' Hospital site and Lambeth Palace. St Thomas' Hospital 1868-71, Henry Currey. 1969-76, Yorke Rosenberg & Mardell. Ref. 92/53 and 101/7 – TQ3079NW and SW The present day building comprises 3 pavilions and a chapel in an Italianate style in brick, a remnant of the original 7 pavilions built by Henry Currey, and with a tree lined promenade facing the Palace of Westminster, and a partially completed scheme by Yorke Rosenberg and Mardell. The YRM scheme is of 13 storey white stone blocks adjacent to Currey's building.
Westminster Abbey & Parliament Square Conservation Area Audit (2008)	No references
St Thomas' Hospital South Wing Statutory List Description 2008 (extract from National Heritage List)	...Notwithstanding its reduced state, the South Wing of St Thomas' Hospital is one of London's most prominent and distinguished riverside buildings, and has outstanding group value with Westminster Palace, a World Heritage Site. Finally, it also has group value with the former medical school of 1870 (q.v.), similarly designed by Currey.

Summary of the contribution made to the OUV / Significance of the WWHS by St Thomas' Hospital (19th Century parts)

Located on the opposite bank of the river Thames east and south-east of the Palace of Westminster. Historically the architectural relationship was an extraordinarily strong one but this was lost with the 1970s redevelopment of the northern part of the Hospital

campus by YRM architects. The remaining 19th Century part of the Hospital is seen in views out of the Palace of Westminster and is seen opposite the Palace of Westminster in views from Westminster bridge (Strategic View 18) and Lambeth Bridge (Strategic View 19). Contribution to setting / OUV is moderate.



Figures 15 and 16 St Thomas' Hospital's Victorian wings make a moderate contribution to the setting of the WWHS.

Summary – Contribution made to Setting by features on the eastern side of the WWHS

3.10 The features within the setting on the eastern side of the WWHS which contribute to its OUV are:

Feature	Contribution made to setting
River Thames	Very high
Westminster Bridge	Very high
Lambeth Bridge	High
County Hall	High
Lambeth Palace	Very high
St Thomas Hospital	Moderate

Table 3 – List of features on eastern side of the WWHS that contribute to the setting.

SADPD Sites and their contribution to the WWHS OUV

3.11 Site Allocation 1 – Royal Street and Site Allocation 2 – St Thomas Hospital are located in Waterloo to the east of the Westminster World Heritage Site. Site 1 sits just outside the study area of the WHS Management Plan (2008) and Site 2 just within. They bound one another at Lambeth Palace Road. See Figure 5 below.



Figure 17 - Map of the study area that informed the WWHS Management Plan (Source page 6 WWHS Management Plan) with the boundary of the WWHS and the two site allocation sites added by the authors.

3.12 The immediate locality of both sites, and the sites themselves, is characterised by post WW2 development built around Lambeth Palace Road which was re-aligned eastward in the 1960s to allow for the expansion of the St Thomas' Hospital campus. Site 1 – Royal Street comprises three existing post-war buildings (Beckett House, Canterbury House and Stangate House), a Victorian school and an Edwardian former church hall. Site 2 comprises 1970s healthcare buildings which form part of St Thomas' Hospital's post-war expansion designed by YRM architects.

Contribution to WWHS made by Site Allocation 1 – Royal Street

3.13 Site 1 sits to the east of the St Thomas' Hospital campus within the defined 'approaches' to the WWHS. Site 1 forms part of the wider urban context of the WWHS in views from Lambeth Bridge where it appears unremarkable. From Westminster Bridge the north most building on the site, Beckett House, can be seen but is undistinguished – just a distant post-war building. Beckett House is an office block clad in brown polished granite and glass which give a glossy effect.



Figure 18 - Beckett House main elevation as viewed from Lambeth Palace Road

3.14 The visibility of Beckett House in relation to the Elizabeth Tower varies depending on the viewing location. It is not visible from the north side of Parliament Square. Nor is it visible from within the garden space in the centre of Parliament Square.

- 3.15 Beckett House starts to reveal itself behind Elizabeth Tower at the extreme north-west corner of Parliament Square. The view from Great George Street, is similar but more distant. See below. Beckett House is the dark mass attached to the base of the Elizabeth Tower.



Figure 19 - Beckett House (brown) as viewed from Great George Street.

- 3.16 As the viewer moves eastwards towards the Elizabeth Tower more of Beckett House reveals itself. See Figure 20 below.



Figure 20 - Beckett House from north side of Parliament Square.

- 3.17 It eventually visually disconnects from the Elizabeth Tower as the viewer approaches the corner with Parliament Street. See Figure 21 below.



Figure 21 – Beckett House eventually disconnects from the base of the Elizabeth Tower creating a sky gap.

- 3.18 By the time the viewer has reached the corner of Parliament Street the North Wing of St Thomas' Hospital abuts the base of the Elizabeth Tower.



Figure 22 - View form corner of Parliament Street showing St Thomas' Hospital North Wing attached to base of Elizabeth Tower.

- 3.19 As a distant, post-war building in the backdrop of the WWHS Beckett House makes a neutral contribution to the OUV of the WWHS– it neither detracts nor enhances.

Contribution to WWHS made by Site Allocation 2 – St Thomas Hospital

- 3.20 This site allocation comprises the lower of the post-war hospital buildings on the Hospital campus which sit on the northern and the eastern boundaries of the campus. The campus is within the 'approaches' to the WWHS and some of the spaces within it are within the 'immediate setting' because of the good views they afford of the Palace of Westminster.

- 3.21 In views from Lambeth Bridge the site allocation buildings are screened from view by the taller campus buildings and similarly largely screened from views of the Palace of Westminster itself although the northern most building, Gassiot House, is the most visible of the group when it comes to the WWHS.



Figure 23 - Gassiot House comprises two seven storey blocks linked around a central courtyard. Here it is viewed from the north side of Westminster Bridge Road

- 3.22 Gassiot House is visible from Westminster Bridge where it is undistinguished – just another of the Hospitals’ post-war buildings. None of which have been identified as contributing to the OUV of the WWHS. They make a neutral contribution.



Figure 24 – Gassiot House from Westminster Bridge

- 3.23 In views eastwards from the north pavement of Parliament Square (outside the WWHS) Gassiot House is visible in the backdrop (wide setting) to the left of the Elizabeth Tower. In some places it visually attaches to the base of the Elizabeth Tower and in others it is separate from it. As a distant, post-war building it makes a neutral contribution to the OUV of the WWHS– it neither detracts nor enhances.



Figure 25 – Gassiot House (low building in centre) as viewed from Great George Street. The base of the Elizabeth Tower can be seen to the right. See also Figure 7.

- 3.24 Like Beckett House, as the viewer approaches Gassiot House from the east it gradually detaches from the base of the Elizabeth Tower.
- 3.25 Gassiot House, as a distant, unobtrusive, post-war block, is considered to make a neutral contribution to the setting of the WWHS.

Conclusion

- 3.26 Site Allocations Sites 1 and 2 currently make a neutral contribution to the setting of the Westminster World Heritage Site

4. Planning Policy Context

4.1 The planning policy context is set out below:

National Planning Policy Framework (2023)

4.2 Part 16 relates to the conservation and enhancement of the historic environment. Para. 195 stresses that heritage assets, including WHS are an irreplaceable resource that should be conserved in a manner appropriate to their significance. Para 196 states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment.

4.3 Para 201 states:

'Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.'

4.4 Para. 205 requires that 'great weight' be placed on the desirability of a designated heritage asset's conservation when the impact of development is being assessed.

4.5 Regarding setting para 212 states:

'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'

4.6 Para 2.13 makes direct reference to World heritage Sites:

'Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a

positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 207 or less than substantial harm under paragraph 208, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.'

London Plan (2021)

4.7 The London Plan has a dedicated policy for World Heritage Sites (Policy HC2) which states:

'A Boroughs with World Heritage Sites, and those that are neighbours to authorities with World Heritage Sites, should include policies in their Development Plans that conserve, promote, actively protect and interpret the Outstanding Universal Value of World Heritage Sites, which includes the authenticity and integrity of their attributes and their management.

B Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes.

C Development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment.

D Up-to-date World Heritage Site Management Plans should be used to inform the plan-making process, and when considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plan.

4.8 With regard the setting of London's World heritage Sites, the policy supporting text states:

‘7.2.3 The setting of London’s World Heritage Sites consists of the surroundings in which they are experienced, and is recognised as fundamentally contributing to the appreciation of a World Heritage Site’s Outstanding Universal Value. As all four of London’s World Heritage Sites are located along the River Thames, the setting of these sites includes the adjacent riverscape as well as the surrounding landscape. Changes to the setting can have an adverse, neutral or beneficial impact on the ability to appreciate the sites’ Outstanding Universal Value. The consideration of views is part of understanding potential impacts on the setting of the World Heritage Sites. Many views to and from World Heritage Sites are covered, in part, by the London Views Management Framework (see Policy HC3 Strategic and Local Views and Policy HC4 London View Management Framework). However, consideration of the attributes that contribute to their Outstanding Universal Value is likely to require other additional views to be considered. These should be set out in World Heritage Site Management Plans (see below), and supported wherever possible by the use of accurate 3D digital modelling and other best practice techniques.

- 4.9 Strategic Views are identified in Policy HC3 and their management covered by policy HC4.

Lambeth Local Plan (2021)

- 4.10 This plan has a dedicated policy relating to the Westminster World Heritage Site (Policy Q19) which states:

‘A. Development affecting the setting and approaches of the Westminster World Heritage Site will be required to demonstrate that it: i. preserves or enhances the Outstanding Universal Value, authenticity and integrity of the World Heritage Site (as set out in the official statement of Outstanding Universal Value and its setting); ii. preserves or enhances the environmental quality of the public realm/ vantage points; and iii. provides the opportunity to better understand, appreciate and reveal the Outstanding Universal Value, authenticity and integrity of the site.

B. Where existing development is identified (through area appraisals, characterisations or similar studies) as negative elements in the setting of approaches to the Westminster World Heritage Site the council will support proposals which address the adverse impact through demolition/removal, height reduction or re-cladding.

4.11 The supporting text explains the sensitivity of the context:

'10.91 The World Heritage Site's location on the bank of the River Thames makes it highly visible from within Lambeth. Indeed, the most impressive views of the Houses of Parliament's striking silhouette and some of the most attractive approaches/views (by river, by road, by air from the London Eye, and on foot) are from within the 'immediate setting' in Lambeth. Equally important is Lambeth's role in the 'wider setting' or backdrop to the World Heritage Site in views from within the City of Westminster (in terms of clear sky) and in views from the Thames bridges (in terms of urban context).

4.12 A map showing the extent of Lambeth's 'immediate setting and approaches to the WWHS' is provided in APPENDIX 1. That map was prepared in response to a request from UNESCO in Decision: 37 COM 7B.90 – 2013 Westminster Palace, Westminster Abbey and Saint Margaret's Church (United Kingdom of Great Britain and Northern Ireland) (C 426bis) which states:

'The World Heritage Committee,...

...4. Requests the State Party to strengthen its policy and planning frameworks to ensure the adequate protection of the setting of the property by defining the immediate and wider setting and view cones of the property in relation to its Outstanding Universal Value and by identifying adequate mechanisms within the respective policies of all.

4.13 Due to a leadership vacuum in response to this matter Lambeth Council proceeded alone and defined the immediate and wider setting where it related to Lambeth Borough.

4.14 Policy Q26 – Tall Buildings defines a tall building in the locality of North Lambeth to be anything above 45m in height. Part A of that policy highlights the importance of World Heritage Site considerations:

‘A. Having particular regard to the international obligation to preserve the OUV of the Westminster World Heritage Site and taking into account the desirability of preserving the settings of heritage assets, proposals for tall buildings will be supported where they are in locations identified as appropriate for tall buildings in Annex 10 and where:

i. will not adversely impact on strategic or local views;

ii. design excellence is achieved (form, proportion, silhouette, detailing and materials etc.);

iii. the proposal makes a positive contribution to public realm and townscape including at street level, whether individually or as part of a group; ...

4.15 Supporting text in para. 10.128 states that *‘The council is also preparing a Site Allocations DPD which may identify sites suitable for tall building development’.*

4.16 In line with London Plan requirements to identify locations suitable for tall building development, the policy includes a map in Annex 10 which identifies locations in Waterloo. Some of those locations fall within Site Allocation Site 1- Royal Street. See Figure 26 below.



Figure 26 - Extract from Lambeth Local Plan's Annex 10 showing locations considered suitable for tall buildings on the Royal Street Site.

4.17 The details of each location below are taken from Annex 10:

Location		General Building Height
Location W7	Lambeth Palace Road / Upper Marsh [Beckett House]	60m AOD
Location W8	Royal Street / Upper Marsh [Stangate Ho. and Canterbury Ho.]	50m AOD well-spaced for good townscape

Table 4 – Extract from Annex 10 of Lambeth Local Plan, 2021

4.18 The evidence to support Policy Q26 of Local Plan (2021) evidence is contained in the following documents [Waterloo Building Height Study, 2018](#), [Westminster WHS Setting Study 2018](#), and the [Topic Paper 8 Tall Buildings 2019](#). The chronology of this work and how it has informed the Site Allocation is explained later in this document.

Southbank and Waterloo Neighbourhood Plan (2017 – 2032)

4.19 The Neighbourhood Plan does not include any policies relating to the World Heritage Site or the locations of Sites 1 or 2.

5. Description of the Site Allocations DPD Project Objectives

5.1 The proposed Site Allocations Development Plan Document (SADPD) is intended to form part of the statutory development plan for Lambeth, alongside the Lambeth Local Plan (2021), the London Plan (2021) and the South Bank and Waterloo Neighbourhood Plan (2019). Its aims are to support delivery of sustainable growth and opportunity in the borough through helping to facilitate investment in specific sites. The proposed SADPD identifies thirteen sites and proposes site-specific policies for these locations. Those proposed site-specific policies are centred around design-led optimisation of development capacity, as required by London Plan policy. The site-specific policies will sit alongside existing development plan policies on topics such as housing quality, residential amenity, carbon reduction, and employment and skills.

Site 1- Royal Street - Reasons for Site Selection

- 5.2 The Royal Street Site Allocation currently on page 129 of Lambeth Local Plan, 2021 was carried over from the Local Plan (2015). With the passage of time since the allocation was prepared, and since the identification of the site as suitable for tall building development (Annex 10 of Lambeth Local Plan, 2021); the emerging site allocation in SADPD will supersede the current version in the Local Plan (2021).
- 5.3 This is the largest development opportunity site in Waterloo. The owner is the Guy's and St Thomas' Charitable Trust which was established over five hundred years ago. Its purpose is to improve the health of people in the London boroughs of Lambeth and Southwark, two of the UK's most diverse and deprived areas. This is achieved through the Charity working with a range of partners to identify, test innovative approaches to health and healthcare, and by supporting Guy's and St Thomas' NHS Foundation Trust through a combination of fundraising and the Charity's own philanthropic support.
- 5.4 The owner is heavily committed to bringing forward development. Previous redevelopment plans (05/01168/FUL) were approved on appeal in 2007. Government has decided not to call-in the recent redevelopment proposal (22/01206/EIAFUL) which is pending approval subject to completion of a legal agreement. Lambeth Council considers a site allocation essential given the opportunities the site presents. Doing nothing is not an option.

Site 2- St Thomas' Hospital - Reasons for Site Selection

- 5.5 Guy's and St Thomas' NHS Foundation Trust is one of the UK's leading hospital trusts with a turnover of £1.6 billion, contracts with 130 clinical commissioning bodies, and 2.5 million patient contacts and 6,567 babies delivered every year. One of the biggest employers locally, with over 16,200 staff. It trains 600+ nurses per year, 750 doctors and one fifth of England's dentists. As a national referral centre for highly rated, specialist services, it provides a full range of community services, including health centres and GP practices, across Lambeth.
- 5.6 The Trust is under continuous pressure to grow healthcare facilities and services on the St Thomas' site and is committed to remaining on the St Thomas' site. This ambition includes:
1. Better integrated care for communities, closer to where people live, by improving technology to facilitate mobile working, encouraging people to manage their own health, and providing a network of well-equipped community clusters.
 2. An expanded Evelina London Children's Hospital providing a wider range of specialist care for twice as many young people, in a more integrated way – delivering a comprehensive children's hospital for London. Permission has been granted for this in 2023.
 3. A partnership with Royal Brompton & Harefield NHS Foundation Trust to transform specialist cardiovascular and respiratory care for London and the UK.
 4. A MedTech Cluster, building on the Trust's existing strengths in emergency care, diagnostic imaging, paediatrics and cardiovascular care and the University's cardiovascular, imaging and healthcare engineering research.
- 5.7 The owners of both sites consider that the physical adjacency of the sites to be key to their ability to deliver health and healthcare innovation.

6. Approach taken design evidence in relation to Sites 1 and 2 and the Westminster World Heritage Site

6.1 The indicative approaches for each site included in design evidence supporting the SADPD is one way to achieve design-led optimisation of the site, assuming it is comprehensively redeveloped. The indicative approach massing, in combination with land use analysis, has been primarily undertaken to inform the approximate land use quantum included within the draft site allocation policy. The indicative approach is for testing purposes only and does not have the status of planning policy or guidance. Nor is it intended to be prescriptive.

Site 1 – Royal Street Evidence Approach

Location

6.2 Royal Street sits 500m to the east of the WWHS. See Figure 27 below.



Figure 27 Royal Street (coloured purple) with the WWHS boundary marked in black.

Site 1 - Regulation 18 Approach

6.3 At Regulation 18, the indicative approach massing within the part of the site allocation north of Royal Street itself, accorded with the building heights in Annex 10 of the adopted Lambeth Local Plan (2021). These had themselves had been informed by the work undertaken within the Westminster World Heritage Site Setting Study (2018) and the Waterloo Building Height Study (2018). The massing on Canterbury House footprint was dictated by the desire to retain a mature tree and to retain some separation from the anticipated blocks across Royal Street to the south. South of Royal Street, on the part of the site not considered a suitable

location for tall building development, the massing was stepped up away from retained historic buildings but never exceeds the threshold height for tall building development in this locality (45m). See extract from Regulation 18 evidence below.



Figure 20 – Indicative Approach - 3D model

Indicative Approach Explained			
Address	Model Colour	Height	Use
Beckett House site	Dark blue	c60m	Office
Stangate House site	Mint green	c52m	Office
Canterbury House site	Yellow	c52m	Office

Figure 28 Extract from Regulation 18 Design Evidence – Royal Street

Representations received relating to Site 1 (Royal St) and its relationship with WWHS

6.3 The Regulation 18 consultation ran from 10 January 2022 to 22 February 2022. Site 1 received 20 responses, 33% of which objected to one or more aspect of the draft allocation. The consultation representations in full and the Council’s responses are appended within the Regulation 19 consultation documentation. In summary:

Respondent R0654 – Historic England

6.4 Four key areas in relation to WWHS:

1. A Heritage Impact Assessment should be prepared for sites 1 and 2.
2. Request for 'maximum' rather than general building heights give heritage sensitivity.
3. Whilst accepting that maximum heights may be possible in some locations it is not considered acceptable across the whole site. A more varied approach to height might help mitigate heritage impacts.
4. Cumulative impacts with Evelina Hospital approval need to be considered.

Respondent R0584 – on behalf of Stanhope PLC (development partner)

6.5 Two key areas in relation to WWHS:

1. Requesting more explicit narrative on the assessment of harmful heritage impacts (including public benefits).
2. Requesting greater flexibility on buildings heights (in excess of those in the draft policy) subject to impact assessment.

Respondent R0804 on behalf of Guy's and St Thomas' Foundation (site owner)

6.6 Two key areas in relation to WWHS:

1. Requesting more explicit narrative on the assessment of harmful heritage impacts (including public benefits). Especially in relation to positive contributor buildings within the Lambeth Palace CA (former school and former church hall).
2. Requesting greater flexibility on buildings heights (in excess of those in the draft policy) subject to impact assessment.

Respondent R1312 – South Bank and Waterloo Neighbourhood Planning Group

6.7 Four key areas in relation to WWHS:

1. The requirement to retain the former school and Institute is welcomed and supported.
2. Consider the heights north of Royal Street (60mAOD) to be unduly dominant.

3. Consider sites north of Royal Street need to be sub-divided and the massing broken down into different building plots.
4. The cumulative effect of Sites 1 and Site 2 needs to be considered.

Respondent R1318 – Waterloo Community Development Group

6.8 Two key areas in relation to WWHS:

1. Support the Policy regarding its approach to the land south of Royal St: that the C19th buildings are retained, and that that part of the site is not appropriate for tall buildings.
2. Consider the whole site appropriate only for development up to 30m.
3. Cumulative effect of Sites 1 and Site 2 needs to be considered.

Changes to the SADPD Site 1 in response to the representations received at Regulation 18.

- 6.12 In response to the representations received, the form of the Indicative Approach on the Royal Street site was reconfigured to maintain a sky gap down the edge of the Elizabeth Tower in Strategic View 27B.2. This has been achieved by suppressing heights on the Canterbury House car park site. See extract from Regulation 19 design evidence below.



Figure 32 – Indicative Approach - 3D model

Indicative Approach Explained			
Address	Model Colour	Height (relative)	Use
Beckett House site	Dark blue	c60m	Office
Stangate House site	Pale Blue	C46m	Office
Canterbury House site	Purple	C46m	Office
Canterbury House Car Park	Pink	C17m	Office

Figure 29 – Indicative approach taken from regulation 19 design evidence.

6.13 The Becket House replacement height (c60m) has been maintained because:

- I. Lambeth considers that no harm results from the modest increase in height at Beckett House from 53m (current height) to 60m. That height is embedded in planning policy (Local Plan Annex 10) which was supported by robust evidence (see chronology in Appendix 2 of this document) and deemed sound by the Planning Inspectorate. That evidence journey included stakeholder workshops with representatives from HE, City of Westminster and GLA where this height was discussed without objection being raised.
- II. Lambeth does not agree that the replacement of the existing Beckett House with a better quality building of greater (60m) height will result in harm to the OUV of the WWHS.

Site 2 – St Thomas’ Hospital Evidence Approach

Location

6.14 Royal Street sits 340m to the east of the WWHS. See map below.



Figure 30 – Site 2 – St Thomas Hospital (blue) with WWHS boundary outlined in black.

Site 2 - Regulation 18 Approach

6.15 The St Thomas’ site is not an existing site allocation and is not identified as a site suitable for tall building development. The Regulation 18 approach saw the two parts of the Site (A and B) increased in height to 44m (below the definition of a tall building in this area which is 45m).

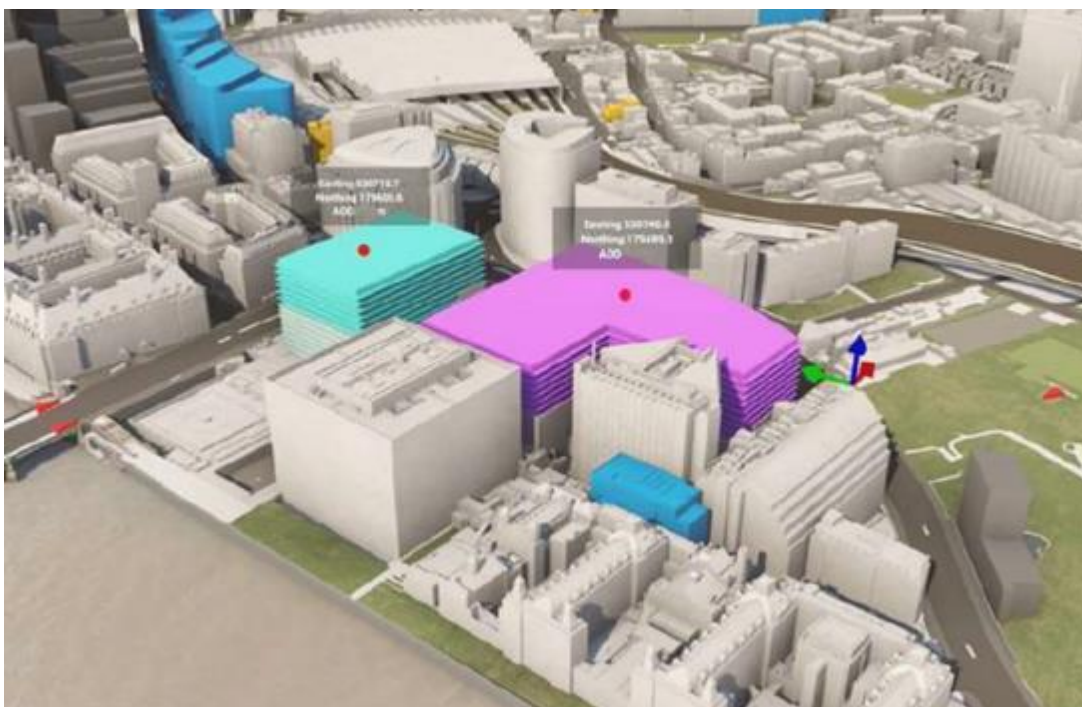


Figure 31 - Extract from Regulation 18 evidence showing the Indicative Approach massing.

Representations received relating to Site 2 and its relationship with WWHS

6.15 Site 2 received 10 comments during the consultation. 11% of those responses objected to one or more aspect of the draft allocation. Those relating to the WWHS are set out below.

Respondent R0806 on behalf of Guy's and St Thomas' NHS Trust

6.16 Three key areas in relation to WWHS:

- Concern that the approach to is unduly restrictive and could undermine future potential.
- Proposed to make whole hospital campus a site allocation.
- Consider campus suitable for tall buildings. Gassiot House should be identified as a tall building location (45m and above).

Respondent R1312 Southbank and Waterloo Neighbourhood Planning Group

6.17 Two key areas in relation to WWHS:

- Policy should explicitly state site is not suitable for tall buildings.
- Gaps should be maintained between large buildings.

Respondent R1318 Waterloo Community Development Group

6.18 Two key areas in relation to WWHS:

- Increase in height of Gassiot House site would be a 'significant intrusion' on WWHS.
- The massing should be broken up and much lower, akin to the current Gassiot House of 32m.
- Strongly object to the proposed quantum of development envisaged for the site.

Respondent R0312 Historic England

6.19 Three key areas in relation to WWHS:

- A Heritage Impact Assessment should be prepared for sites 1 and 2.
- A masterplan for the sites would be helpful.
- Concern about 44m height at Gassiot House; more guidance is required.

Respondent R0852 Mayor of London

6.20 One area in relation to WWHS:

- The allocation should consider whether development proposals would need to be supported by Heritage Impact Assessments.

Changes to the SADPD Site 2 in response to the representations received.

6.21 In response to the representations received which flagged concern on the WWHS setting, the form of the Indicative Approach on the St Thomas' Hospital site was reconfigured to maintain a sky gap down the edge of the Elizabeth Tower in Strategic View 27B.2. This has been achieved by cutting back the northern edge of Block B. In addition, the height of Block A has been reduced to 40m. On Block A the height has been reduced to 40m and the building footprint extended westward slightly.

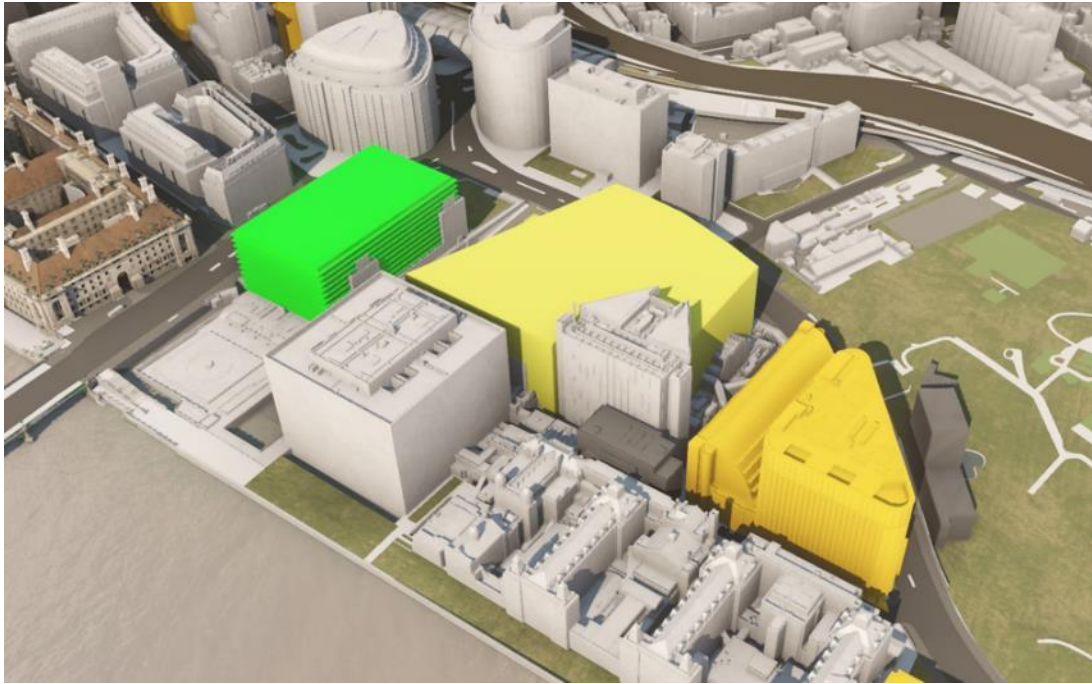


Figure 32 - Extract from Regulation 19 Evidence showing Indicative Approach for Site 2.

6.22 The cumulative effect of Sites 1 and 2 has been modelled and is presented in the design evidence.

Mitigation Measures

6.23 In line with the ICOMOS and Mayoral guidance this section has illustrated how effort has been made to be made to mitigate against any perceived adverse impacts through revised iterations of the Indicative approaches for Sites 1 and 2.

7. Effect of the revised Indicative Approach for Sites 1 and 2 on the OUV of the Westminster World Heritage Site

7.1 The revised indicative approaches and their retesting are set out in their respective design evidence documents. The assessment below has been informed by that retesting.

Effect on the Outstanding Universal Value Criteria

7.2 Table 5 below looks at the OUV criteria for the WWHS and the effect Sites 1 and 2 have on that OUV.

Criteria	Description taken from the Management Plan (2008) (pages 90-91)	Effect on OUV from Sites 1 and 2
	The way in which the Westminster WHS meets the criteria is set out in the inscription as follows:	
i. represent a masterpiece of human creative genius;	Criterion 1 – Westminster Abbey is a unique artistic construction representing a striking sequence of the successive phases of English Gothic art.	Nil
ii. exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or	Criterion 2 – Other than its influence on English architecture during the Middle Ages, the Abbey has played another leading role by influencing the work of	Nil

technology, monumental arts, town-planning or landscape design;	Charles Barry and Augustus Welby Pugin at Westminster Palace, in the “Gothic Revival” of the XIX century.	
iv. be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;	Criterion 4 – The Abbey, the Palace and St Margaret’s illustrate in a concrete way the specificities of parliamentary monarchy over as long a period of time as nine centuries. Whether one looks at the royal tombs of the chapterhouse, the remarkable vastness of Westminster Hall, of the House of Lords or of the House of Commons, art is everywhere present and harmonious, making a veritable museum of the history of the United Kingdom.	Change to setting - this relates to the Site 1 height increase on the Beckett House site which will be visible from N side of Parliament Square
Criteria	Description taken from the Management Plan (2008)	
Criterion (vi) to be directly associated with events or living tradition with ideas or with beliefs, with artistic and	n/a	nil

literary works of outstanding universal significance.		
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Table 5 - The effect allocations on Sites 1 and 2 have on the WWHS's OUV.

Effect n Individual Components of the World Heritage Site

7.3 Table 6 below looks at the effect of the site allocations on the individual component buildings of the WWHS.

Component Building	Effect OUV (inc. Setting) from the Site Allocations	Comment
Abbey Precinct	nil	n/a
Church House and Westminster School	nil	n/a
Deans Yard	nil	n/a
Jewel Tower	nil	n/a
Palace of Westminster	Change to setting	This relates to the Site 1 height increase on the Beckett House site which will be visible from the north side of Parliament Square.
St Margarets Church	nil	n/a
1 – 8 The Sanctuary	nil	n/a
Westminster Abbey	nil	n/a

Table 6 – Effect of the site allocations on the individual component buildings of the WWHS.

7.4 Table 7 below looks at the components of setting that contribute to the OUV of the WWHS and how Sites 1 and 2 effect on their contribution to the setting of the WWHS.

Setting Component	Effect of Allocation Sites 1 and 2 on contribution made to WWHS setting	Comment
River Thames (Very High Contribution)	Nil	The relationship of the River Thames to the WWHS remains unaltered.
Westminster Bridge (Very High Contribution)	Nil	The relationship of Westminster Bridge to the WWHS remains unaltered.
Lambeth Bridge (High Contribution)	Nil	The relationship of Lambeth bridge to the WWHS remains unaltered.
County Hall (High Contribution)	Nil	The relationship of county Hall to the WWHS remains unaltered.
Lambeth Palace (Very High Contribution)	Nil	The relationship of Lambeth Palace to the WWHS remains unaltered.
St Thomas's Hospital Victorian Buildings (Moderate Contribution)	Nil	The relationship of St Thomas' Hospital's Victorian buildings to the WWHS remains unaltered.

Table 7 – Effects of Sites 1 and 2 effect on the contribution made by other features to the setting / OUV of the WWHS.

Effect on Wider Setting of Palace of Westminster from Sites 1 and 2

7.5 Wider setting in this context relates to the backdrop of the Palace of Westminster. Para 4.17 of the Mayor's guidance identifies the important role of building profiles, rooflines and visual gaps to the character of London's World Heritage Sites. A table on page 65 provides an assessment framework for setting impacts. Page 119 contains a guide for assessing the scale of change. Where the guide relates to setting, key extracts are provided in Table 8.

Impact grading	Built heritage of Historic Urban Landscape attributes
MAJOR	Comprehensive changes to setting.
MODERATE	Changes to setting of an historic building, such that it is significantly changed.
MINOR	Changes to setting of an historic building so that it is noticeably changed.
NEGLIGIBLE	Slight changes to historic building element or setting that hardly affect it
NO CHANGE	No change to fabric of setting

Table 8 – Extract from page 119 of the Mayor’s WWHS SPG.

7.6 Using the table above it is considered that the effect on the setting of the WWHS caused by the Site Allocation Site1 in views from north side of Parliament Square is ‘MINOR’.

7.7 Page 122 of the SPD provides a table to aid assessment of Magnitude of Impacts. It is reproduced in Table 9 below.

Value of Heritage Asset	Scale of Change				
	NO CHANGE	NEGLIGIBLE CHANGE	MINOR CHANGE	MODERATE CHANGE	MAJOR CHANGE
VERY HIGH (OUV of World Heritage Sites)	Neutral	Small	Medium/ Large	Large/Very Large	Very Large
HIGH	Neutral	Small	Medium/ Small	Medium/ Large	Large/Very Large
MEDIUM	Neutral	Neutral/ Small	Small	Medium	Medium/ Large
LOW	Neutral	Neutral/ Small	Neutral/ Small	Small	Medium/ Small
NEGLIGIBLE	Neutral	Neutral	Neutral/ Small	Neutral/ Small	Small

Table 9 - Proportionate Approach to Assessing the Magnitude of Impacts (From Mayor’s SPD)

- 7.8 Using the table above it is considered that the effect on the setting of the WWHS caused by the Site Allocation Site 1 is 'MEDIUM'. It should be noted that 'magnitude of change' should not be automatically equated to a harmful effect.

Contribution of Setting

- 7.9 Part 2 of this document identifies how the various relevant heritage publications (including the WHS Management Plan) explain the contribution made to setting by development in Lambeth. None of the documents identify Beckett House or Gassiot House as having a negative effect on setting. They are not mentioned at all. Lambeth's own assessment in Part 2 has concluded that the current buildings make a 'neutral' contribution to the setting of the WWHS.
- 7.10 The LVMF does not identify a harmful effect from Beckett House or Gassiot House in view 27B. Those buildings are not subject to the protected silhouette and the LVMF guidance anticipates development in the background. Para 457 states:

'Development should not detract from the clear separation between major groups of buildings nor compromise the strong vertical emphasis of the towers defining the extremities of the Palace of Westminster...'

- 7.11 None of the various source documents available identify Beckett House as having an adverse effect in the view. Therefore, at 53m, it is reasonable to assume that, where it abuts at the base of the Elizabeth Tower, it does not compromise what the LVMF defines as the 'strong vertical emphasis' of the Elizabeth Tower. Similarly, the current Gassiot House where it attaches.

Effect of Site 1 - Would a 7m increase in the height on the Beckett House site compromise the 'strong vertical emphasis' of the Elizabeth Tower?

- 7.12 Appendix 2 of this document shows the chronology of evidence work that has been undertaken by Lambeth to inform potential building heights in Waterloo.

7.13 The issue of Beckett House was identified between consultants Millerhare and Lambeth in 2017. As the leading consultant in these matters, Millerhare’s extensive experience of heritage impacts and views in central London was invaluable. Millerhare and Lambeth concluded that an alignment of the height with the adjoining Urbanest building, itself being informed by the roofline of County Hall, created a clear ‘horizon’ of built development in the backdrop of the view and that the modest uplift in height would not compromise the strong vertical emphasis of the Elizabeth Tower. That approach was put to stakeholders in a workshop on 17 April 2018. No concerns were raised. The approach was spelled out (and illustrated) in Topic Paper 8 – tall Buildings at the Lambeth Local Plan examination and, again, no objections were raised. The height became established in Annex 10 of the Local Plan.

7.14 Lambeth maintains the view that whilst an increase in height of 7m might have a ‘Minor’ Effect which technically has a ‘Medium’ Magnitude of Impact, it does not automatically follow that harm would result.

7.15 One key consideration is the extent at which the change is appreciated. It should be remembered that the Strategic view is the full extent of the Palace of Westminster, and Westminster Abbey and St Margaret’s Church, not just the Elizabeth Tower. Development in Lambeth is peripheral, not central to the appreciation of OUV in this wider view. See extract from LVMF in Figure 22 below.



Figure 33– Extract from LVMF showing View from Assessment Point 27B.2

7.16 Lambeth considers that a slightly taller, contemporary replacement, of pale and recessive character on the extreme periphery of the view of the WWHS would be less eye catching in when compared to the current dark brown Becket House building, and thus have a beneficial effect on the setting of the WWHS. The increase in height does not harm the strong vertical emphasis of the Elizabeth Tower. Nor does it diminish an appreciation of the OUV.

Effect of Site 2 - Would an 8m increase in the height on the Gassiot House site compromise the 'strong vertical emphasis' of the Elizabeth Tower?

7.17 The Site Allocation anticipates a redevelopment of Gassiot House to a height of 40m which would be 8m taller than the existing building. See below.



Figure 34 – Indicative approach taken from regulation 19 design evidence. Gassiot House replacement massing shown in green.

7.18 Gassiot House is always viewed in the foreground of taller development. VUCity model testing in the design evidence (TVIA image 5) has illustrated that the anticipated increase in the height of Gassiot House would not appear taller than the background buildings (Urbanest and Beckett House) in views from north side of Parliament Square.



Figure 35 - View 5 from the Site 2 Regulation 19 Design Evidence showing Gassiot House is currently (left image) viewed against existing backdrop development. A similar effect is maintained in the Indicative Approach (right image) where Gassiot House is shown in green.

Effect on the Approaches to the WWHS

Effect on the Approaches

7.19 Both sites sit with Lambeth’s Immediate Approaches to the World Heritage Site which are designated in order to ensure effective management of these spaces. The supporting text in Policy Q19 of the Lambeth Local Plan (2021) states:

‘10.93 An uncluttered, well-ordered and attractive urban environment, including public realm, is key to maintaining a suitable setting and approaches to the World Heritage Site. New development within this context should be well mannered and subordinate in terms of form, materiality and treatment in order to ensure that the Palace of Westminster retains its pre-eminence within the cityscape.’

7.20 At Site 1 - Royal Street the public realm approaches are extremely poor and detract from the visitor experience as they approach the WWHS here. Redevelopment presents a significant

opportunity to increase the amount of public realm and enhance the existing public realm here. The effect on the approaches will be beneficial.

- 7.21 At Site 2 – St Thomas’s the public realm approaches along Lambeth Palace Road in particular are poor (services spaces and parking fronting the roadside in particular). Redevelopment presents an opportunity to address this. The effect on the approaches will be beneficial.

Effect on the Immediate Setting of the WWHS

- 7.22 Lambeth has mapped an area of ‘Immediate setting’ which it considers provides the best locations within Lambeth from which to visually appreciate the significance of the WWHS. It includes the River Thames, its bridges, Albert Embankment, the Queen’s Walk etc.. The supporting text supporting Policy Q19 in the Lambeth Local Plan states:

‘10.91 The World Heritage Site’s location on the bank of the River Thames makes it highly visible from within Lambeth. Indeed, the most impressive views of the Houses of Parliament’s striking silhouette and some of the most attractive approaches/views (by river, by road, by air from the London Eye, and on foot) are from within the ‘immediate setting’ in Lambeth. Equally important is Lambeth’s role in the ‘wider setting’ or backdrop to the World Heritage Site in views from within the City of Westminster (in terms of clear sky) and in views from the Thames bridges (in terms of urban context).’

- 7.23 Site 1 – Royal Street is not located within the Immediate Setting and will have no effect on it. Block A (Gassiot House) of Site 2 – St Thomas’ abuts the immediate setting on three sides (North, West and South). In these three locations views into the WWHS are readily appreciable; Elizabeth Tower is appreciated clearly and the rest of the Palace of Westminster more so in winter months when trees are bare.
- 7.24 The Revised indicative approach massing for Block A at Regulation 19 comes further westward than the previous iteration. The increase in floor area compensates for the reduction in height when compared to the Regulation 18 iteration. The massing would span the existing pedestrian walkway which offers the opportunity to provide shelter for pedestrians in the form of a colonnade.



Figure 36 - Existing walkway with Western elevation of Gassiot House on left side.

- 7.25 An open colonnade at this level is not considered to have an adverse impact on the immediate setting of the Westminster World Heritage Site so long as views are maintained westward towards the WHS.



Figure 37 – Example – a colonnade at R7 Kings Cross by Duggan Morris architects

8 Heritage Impact Assessment Conclusion

- 8.1 This assessment has illustrated that the implications of the site allocations sites 1 and 2 upon the significance of the Westminster World Heritage Site have been given the fullest consideration through the site allocations process. In the case of Site 1 that process began in 2017 with the preparation of evidence for the now adopted Lambeth Local Plan (2021).
- 8.2 This assessment has not identified adverse impacts on the WWHS from the indicative approaches for each site and has informed the Regulation 19 version of the draft Site Allocations Development Plan policy. Indeed, it has found that the redevelopment of these sites offers opportunities to improve the setting and approaches of the WWHS.
- 8.3 This assessment is just one iteration of the Heritage Impact Assessment for these sites undertake to inform the preparation of planning policy and should be read in conjunction with the Design evidence for the two sites within the draft SADPD- Proposed Submission Version. It should be remembered that applicants for any application coming forward on the site allocations sites will be required to undertake Heritage Impact Assessments for their proposals. Any applications would also be subject to public scrutiny and assessed against the policies of the development plan and any other material planning considerations.

APPENDIX 1 – Map showing the Immediate Setting of, and Approaches to the Westminster World Heritage Site within Lambeth

The 'immediate setting' is those places within Lambeth where the viewer can gain a good appreciation of some or part of the Westminster World Heritage Site. The 'approaches' is the area of public realm experienced by those approaching the Westminster World Heritage site within Lambeth.



APPENDIX 2 Chronology of background work and stakeholder input that informed the preparation the policy basis and evidence work for SADPD Sites 1 and 2 in relation to WWHS

Date	Action / Event	Site 1 – Royal Street	Site 2 St Thomas' Hospital
2014	Shell Centre Call-in decision	<p>The Shell Centre redevelopment stands 320m north of Site 1, and 260m north of Site 2. It comprises a cluster of tall buildings (up to c.130m AOD) around the historic Shell Tower. The planning application was approved in June 2014 following a Call-in Inquiry. Having considered a significant range of heritage harm claims from objectors, the Inspector concluded the major development would cause 'no heritage harm'. In relation to the WWHS the Inspector stated:</p> <p><i>Effect on World Heritage Site</i></p> <p><i>'16.46. LVMF viewpoints 27A.1 and 27A.2 are on the south side of Parliament Square and therefore within the WWHS. From these points the principal feature of the view is the Elizabeth Tower. To the left of the Elizabeth Tower, in the gap to Portcullis House, is County Hall, across the river and in the background. Further in the background is the Shell Tower. The proposed development around the Shell Tower would be visible from viewpoints 27A.1 and 27A.2 but, with regard to guidance in the LVMF which flows from the plan-led support for development in the WOA, the buildings would be of the highest architectural quality. Though they would be in the background of the setting of the WWHS they would not cause any harm to this setting or to the outstanding universal value of the WWHS.'</i></p>	

			<p><i>'16.47. Whilst the LVMF views have been chosen to assess, consistently, possible future development wherever it may be planned, views in Parliament Square are fluid and are dominated by the very significant heritage assets that surround it. These heritage assets are of the highest national significance and not even the London Eye, which appears above Portcullis House, detracts from an appreciation of the heritage assets or the WWHS.'</i></p>
		n/a	n/a
2015	Lambeth Local Plan	World Heritage Site Policy (Q19) introduced. Lambeth updates its protected local views (policy Q23) with a particular focus on those important to the WWHS.	
		Contains a Site Allocation for this site under Policy S2 'new or improved social infrastructure'	<p><i>Spatial Policy</i></p> <p><i>3.5 A number of key elements of infrastructure have been identified to support growth in housing and jobs over the plan period:</i></p> <ul style="list-style-type: none"> <i>• reconfiguration of the King's College Hospital (Denmark Hill) and Guy's and St Thomas' Hospital estates</i>
2016	Albert Embankment CA boundary changes	HE and all affected parties consulted in advance. following consultation	
		n/a	North part of campus moved from Southbank CA so that whole hospital is within the Albert Embankment CA
2017	Albert Embankment CA Appraisal adopted	Included for first time, the WWHS settings and approaches map. HE consulted on the draft version. following consultation	
		n/a	Regarding the Hospital it states:

2.78 The post-war development to the north end of the campus (fronting Westminster Bridge Road and the north end of Lambeth Palace Road is characterised by the white tiled blocks of various heights (Gassiot House, Lambeth Wing, North Wing) and a tower block (East Wing). These are successful in architectural and townscape terms (the pale tone resembles Portland stone and their simple forms are calm) but the parking areas and service yards fronting Lambeth Palace Road are generally an eyesore and roof top antenna add visual clutter to the River frontage.

2017 Lambeth Palace CA Appraisal adopted
following consultation

Includes analysis of Lambeth Palace's contribution to WWHS's OUV. HE consulted on the draft version.

Regarding Royal Street, it states: n/a

*Royal Street
2.69 Only the Southern side of this road is within the conservation area. No. 10 is c1900 in character, two storeys in red brick with terracotta banding and keystones. Behind no 10 Royal Street, and accessed from Carlisle Street, is the*

former Holy Trinity Primary School – an attractive group of low school buildings dating from 1847. It has stock brick walls, gabled slate roofs and timber casement windows.

2.70 The Northern side of Royal Street is towered over by Stangate House, a well-detailed fourteen-storey point block; to its East is Canterbury House, a nine-storey slab block in a Corbusian style modernist form; both are outside the conservation area.

2017 UNESCO Reactive Mission

The Mission was presented with work to date on Lambeth’s immediate setting and approaches mapping and a walk-about within the approaches outlined Lambeth’s street-clutter removal programme.

2017 Millerhare research

This work, undertaken by leading consultants Millerhare using an accurate digital model, sought to understand three-dimensionally the extent of existing protected silhouettes (in strategic views) and their implications for future development around the WWHS with a focus on Lambeth

Modelling identifies that Beckett House is located within a ‘gap’ in the protected silhouettes height constraints.

Modelling identifies that Gassiot House is located within a ‘gap’ in the protected silhouette height constraints

- 2017** 3 x stakeholder meetings at Millerhare's offices
- Representatives from Millerhare, Historic England, Westminster City Council, GLA, Lambeth Council and other stakeholders discussed the ongoing interim findings of the Millerhare with particular the gaps in the protected silhouette coverage.
- 2018** 17 April – Stakeholder meeting at Millerhare's offices
- Hosts – John Hare and David Rix (Millerhare), Stakeholder's – David English (HE), Elliot Kemp (GLA), Robert Ayton and Jane Hamilton (Westminster City Council), David Andrews (Wandsworth Council), Doug Black (Lambeth Council).

In this meeting Doug Black (DB) and John Hare (JH) briefed the stakeholders on the development of the work to date and shared their draft assumptions on a number of issues the work to date had raised. Stakeholders then had the opportunity to feedback.

In point 3.9 the group were discussing what form development should take in the backdrop of the WWHS (St Thomas Hospital etc) to the left of Elizabeth Tower in LVMF View 27B. Case 2 relates to the protected silhouette extrusion. Case 3 related to the gaps in the extrusions where judgement was required.

Extract from minutes:

'3.9 CASE 2 – From LVMF view 27b – RA – concerned that there was a distinct hike in the silhouette (caused by Elizabeth Tower) at St Thomas Hospital / York Road. DB explained that it was a matter of judgement on what constraints to apply to address this in CASE 3 - we need to collectively understand the assumptions /agree the approach is sound. JH illustrated that the Case3 assumption [proposed development heights] was based on an extrusion the ridge line of County Hall. DB

explained that the Urban Nest building height had also been based on that. ‘

The Case 3 assumption was subsequently illustrated in Part 6 of Lambeth’s Topic Paper 8 ‘tall Buildings’ (2019). See later.

The stakeholder feedback at that meeting is recorded as follows:

‘3.15 DE – this could lead to Lambeth having an ‘excellent’ evidence base not only for its tall buildings policy but also for the wider WWHS Management Plan. It could be a model for others.

3.16 DB – advised that there was only so far Lambeth could reasonably take the work and that it was up to the other stakeholders to develop it further if they wished. Lambeth did not have the resources, for example, to do further work on midtown.

3.17 DA – the approach appears logical. DE – really useful work for the emerging WWHS management plan. JH – Case 1 and Case 2 maps are factual – based on existing constraints and thus will be uncontentious. Case 3 required further development, a clearer narrative.

Agreed - given some of the assumptions had no statutory weight would need to be embedded into to each borough’s policy of guidance going forward if it was to acquire weight.’

Considering the LVMF n/a
guidance for Strategic
View 27B, Lambeth
tabled a proposed height

		of c60m for Beckett House site – which would bring its height in line with its neighbour Urbanest. No objection raised by stakeholders at that meeting.
2018	Westminster WHS Setting Study	<p>The result of the Millerhale research and reflecting the conclusions of stakeholder discussions. The height constraints are mapped in 10m increments. Published in 2018 as part of Lambeth’s draft Local Plan evidence base.</p> <p>Beckett House sites within a 50-60m height constraint zone Gassiot House sits within a 40-50m height constraint zone.</p>
2018	Waterloo Building Height study	<p>Constraint led study prepared by Lambeth in order to identify tall building locations and suitable building heights. Informed by VU.City modelling of key views. Published as part of Lambeth’s draft local plan evidence base in 2018.</p> <p>With regard what is now SA n/a</p> <p>Site 1 it stated:</p> <p><i>‘Archbishops Park and St Thomas’ Hospital’s listed buildings has resulted in a model of 50m AOD being considered. Recommended General Height: 50m AOD max.’</i></p>
2019	Lambeth Topic Paper No. 8 - Tall Buildings	<p>This was prepared to set out a narrative for the Local Plan Inspector on the extensive work undertaken in relation to the Council’s emerging tall building policy.</p> <p>Part 6 of the Topic Paper n/a</p> <p>illustrates the anticipated effect of development on the WWHS from a scheme</p>

on the 'Royal Street' site. It states that stakeholders (key representatives from HE, GLA, Westminster City Council and Wandsworth) had discussed the matter in a meeting at Millerhare's office (17 April 2018 meeting above).

2021 Adoption of Lambeth Local Plan (2021)

Commits to a Site Allocations DPD: *'1.6 Additional site allocation policies will be brought forward in a subsequent Site Allocations Development Plan Document.'*

The site Allocation for this site under Policy S2 'new or improved social infrastructure' is carried over from Local Plan 2015.

Plan acknowledges the strategic importance of St Thomas' Hospital in terms of future growth:

Annex 10 identifies Becket House (W7) as a suitable location for general building height of 60m AOD, and Stangate House / Canterbury House (W8) as suitable location for tall buildings 50m AOD 'well-spaced for good townscape'.

2.100 The configuration of health and social care facilities is undergoing considerable change across London to meet the current and future needs of the growing population, the challenges of high population turnover and the requirements of modern service delivery. This includes additional GP provision and the reconfiguration of the Kings College Hospital, Guy's and St Thomas' and South London and Maudsley NHS Trust estates to ensure future requirements are met.

2021 **VU.City model updates** Lambeth commissions detailed architectural renders of the key landmark buildings along the River Thames including Lambeth Palace, County Hall, Royal Festival Hall and the National Theatre. This work was in order to aid heritage impact assessments.

Sources

Albert Embankment Conservation Area Character Appraisal, 2017

Draft Lambeth Site Allocation Development Plan Documents (SADPD) Regulation 18 Design Evidence, 2022

Lambeth Local Plan, 2021

Lambeth Palace Conservation Area Character Appraisal, 2017

London's World Heritage Sites - Guidance on Settings SPD, March 2012

Southbank Conservation Area Conservation Area Statement, 2007

Waterloo Building Height Study, 2018

Westminster World Heritage Site Setting Study, 2018

Westminster Abbey and Parliament Square Conservation Area Audit, 2008

The Palace of Westminster and Westminster Abbey including St Margaret's Church World Heritage Site Management Plan, May 2007

- End of Document -