

# Lambeth Site Allocations DPD – Proposed Submission Version

## Design Evidence

### SA 9 - Gabriel's Wharf / Princes Wharf, Upper Ground, SE1



September 2023

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## 1. Introduction

- 1.1 This design evidence demonstrates the approach taken to understanding the design-led optimisation of the site to inform the content of the draft site allocation policy for this site.
- 1.2 This evidence is in several parts. Part 2 contains an assessment of the site and its context and analysis of the opportunities and constraints these present. That assessment has informed the key design principles for approaching development on the site as set out in Part 3. The detailed analysis has allowed an indicative approach to massing and height to be developed which is set out in Part 4. The indicative approach has been tested to ensure it meets the key design principles and this testing is explained in Part 5. Part 6 concludes the evidence with the identification of key design considerations to be included within the SADPD Policy itself.
- 1.3 The indicative approach included in this evidence is one way to achieve design-led optimisation of the site, assuming it is comprehensively redeveloped. The indicative approach is for testing purposes only and does not have the status of planning policy or guidance. It is not intended to be prescriptive. Applicants and their architects are expected to develop their own approaches to optimisation of capacity within the context of the parameters, constraints and opportunities set out in the site allocation policy.
- 1.4 The indicative approach massing, in combination with land use analysis, has informed the approximate land use quantum included within the draft site allocation policy. As the indicative approach does not include detailed floor plan designs, a number of standard assumptions have been used to approximate the potential number of residential units, including London Plan space internal standards, London Plan and Local Plan external amenity space standards, Local Plan requirements for dual aspect residential units, Local Plan policy for dwelling size mix, and best practice separation distances for that context. For this reason, the indicative quantum included in the draft allocation are approximate and should not be read as absolute minima or maxima. Applicants and their architects may be able to demonstrate a different figure based on alternative design solutions to the site. Detailed planning assessment of design proposals at pre-application and planning application stage may also result in a variation on the indicative figures included in the draft site allocation policy.
- 1.5 Building height definitions can be found in Local Plan Policy Q26. As storey heights vary according to the building use, they are not an accurate means to gauge height. For that reason, building heights are expressed in metres rather than storeys. Additionally, above Ordinance Datum (AOD) height is used to aid understanding of site and context topography in those circumstances where the topography is varied.
- 1.6 Following the Regulation 18 Consultation, the following changes have been made:
  - Policy worded updated to allow for an element of extra care housing where need is demonstrated.
  - No significant change to development principles.

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## 2. Site appraisal / analysis

### Site Overview

2.1 The image below sets out the main features of the site and its immediate context.

Site Address – Gabriel's Wharf and Princes Wharf, Upper Ground, SE1



Figure 1 – Site boundary map

## Site Context Photographs

2.2 The photographs in this section show the site and its context.



Figure 2 - The site from the north bank with former ITV tower to the right, Bernie Spain Gardens to centre and Oxo building on the left.



Figure 3 - The site from Blackfriars Bridge with OXO building in foreground. The mature trees are on the Queen's Walk.



Figure 4 - The site from Upper Ground – Gabriel's Wharf in the foreground and the buildings of Princes Wharf occupying the middle ground. The former ITV tower can be seen on the left.



Figure 5 - The current boundary of Gabriel's Wharf to Bernie Spain Gardens.



Figure 6 – Site viewed through Bernie Spain gardens from the borough Boundary with Southwark



Figure 7 – Site viewed from southern half of Bernie Spain Gardens



## Site Character and Brief History

- 2.3 The south bank of the River Thames has a long history of trade and commerce and was tightly packed with wharfs for centuries as the river served as the city's main transport infrastructure for bulky goods. During the 19<sup>th</sup> Century Gabriel's Wharf was an open timber yard with a substantial warehouse, while Princes Wharf shared an inland dock with Moore's Wharf (now occupied by the former ITV buildings). Both wharfs survived in commercial use until the decades immediately after the Second World War but the post-war land use planning and the masterplan vision for the Southbank by the London County Council / Greater London Council ultimately led the relocation of the historic uses.
- 2.4 The early post-war masterplan for the area was built off the back of the success of the Festival of Britain and saw the creation of a landscaped riverside park extending along the whole of the Southbank and dotted with cultural buildings and facilities. The built form of that vision evolved in the post-war decades but key components remained. For example, by increments the Queen's walk was established along the river Thames frontage and open spaces created. The last of these, Bernie Spain Gardens, was created on the site of Nelson's Wharf in the late 1980s. The Southbank today is a thriving visitor attraction but also includes a long-established residential community.
- 2.5 The site has south and east frontages to the quiet residential streets of the Coin Street Community and a northern frontage to the bustling pedestrian promenade of the Queen's Walk.

### Gabriel's Wharf

- 2.6 The historic buildings on the site were cleared many years ago. Gabriel's Wharf, benefiting from a frontage to the Queen's Walk, was laid out in its current form in the late 1980s. Its single storey retail and restaurant uses front an internal paved yard. The current arrangement fails to utilise its relationship with Bernie Spain Gardens to the east.
- 2.7 Gabriel's Wharf provides a fully accessible walking route to the river from Upper Ground. Additionally, a pedestrian footway runs along its eastern boundary at Bernie Spain Gardens but this is undermined by the untidy and inactive back of the site, making it the less attractive of the two routes.

### Princes Wharf

- 2.8 The buildings on Princes Wharf are the last remaining wharf buildings on Lambeth's river frontage. That said, with the exception of the Tudor Revival frontage building to Upper Ground (no. 58 Upper Ground) they date only from the early 20<sup>th</sup> Century and have no architectural interest. The Princes' Wharf currently presents a dead frontage to the Queen's Walk. The western building of Princes Wharf which presents to the former ITV site has an irregular alignment which follows the line of the historic dock it once shared with Moore's Wharf.



Figure 8 - Bernie Spain Gardens and Gabriel's Wharf photographs in the early 1990s.



Figure 9 - Princes Wharf and Gabriel's Wharf (foreground), Moore's Wharf (middle Ground) and Stamford's Wharf (AKA OXO building) (middle ground). Photograph taken from the former ITV tower in the 1970s.



Figure 10 - Princes Wharf and Gabriel's Wharf (foreground), Moore's Wharf (middle Ground) and Stamford's Wharf (AKA OXO building) (middle ground) photographed from the northernmost end of the Queen's Walk in the 1970s.

### Historical Maps

- 2.9 The 19<sup>th</sup> Century maps show a dense concentration of commercial buildings / wharfs lining the riverbank – the development type which prevailed right up until the 1970s.

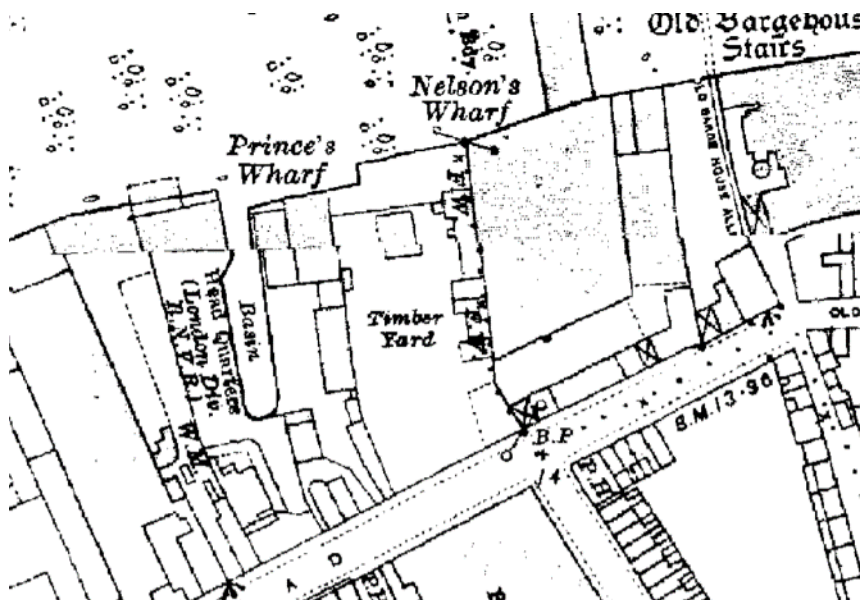


Figure 11 – 1910s OS map showing a basin / dock shared between Princes' Wharf and site wharf to its west. A timber yard occupies Gabriel's Wharf. Old Barge House alley can be seen leading to the Old Barge House stairs.

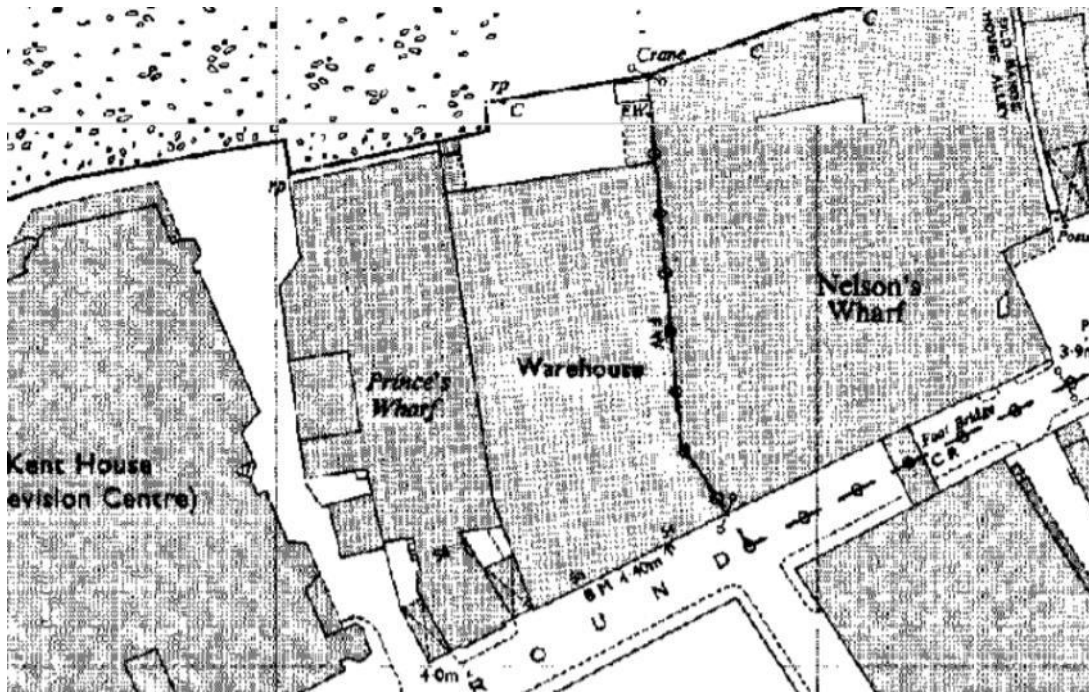


Figure 12 – 1970s OS map showing the historic arrangement of the wharfs with warehouses occupying both sites, as part of an unbroken line of buildings between the river and Upper Ground. The ITV development is captioned 'Kent House'. The site of Nelson's Wharf is today occupied by Bernie Spain Gardens. The Queen's Walk had not yet reached this section of the Southbank.

## Site Context

### Local Character

- 2.10 One of the defining characteristics of the locality is its relationship with the River Thames which provides a major amenity to Londoners and visitors. The Queen's Walk is probably London's most popular with thousands of daily visitors walking along the riverside promenade. It is a safe and pleasant place given the absence of traffic, the great river views, and the presence of a low tide 'beach' on the Thames directly in front of Gabriel's Wharf. The Walk is lined by numerous permanent and pop-up food and drink outlets which take advantage of the high footfall. The Oxo Building, across the borough boundary, has a ground floor retail frontage and includes restaurants above.
- 2.11 The site is located close to the borough boundary with London Borough of Southwark and each borough here has a distinct character.

### Southwark

- 2.12 The Old Barge House Alley Conservation Area (which includes OXO tower) retains its historic river side / commercial character with a concentration of Victorian and early 20<sup>th</sup> Century commercial buildings. Lambeth's riverside which exhibited these characteristics also.

## Lambeth

- 2.13 Immediately to the south of the site is the established residential population of Waterloo which is focused on the streets to the north and south of Stamford Street. South of Upper Ground is the housing Coin Street community who also own and manage Bernie Spain Gardens. The good quality housing, leafy streets and open spaces give the area a leisurely and tranquil character.
- 2.14 The locality is characterised by cultural buildings including the Royal Festival Hall, Queen Elizabeth Hall, Hayward Gallery, National Theatre, BFI, and the Ballet Rambert. The London Eye and other tourist attractions provide supplementary visitor facilities. The current uses at Gabriel's Wharf support this culture and leisure role.
- 2.15 The Southbank Conservation Area covers the wider area including the site and Bernie Spain Gardens (see later). The buildings on the River frontage of the Southbank Conservation Area make an important contribution to the character of the wider city. This is touched upon in the Lambeth Local Distinctiveness Study (2012) and explained in more detail in Part 1 of the draft Design Code SPD (See paragraphs 1.17 – 1:20). Policy Q24 'River Thames' of the Lambeth Plan is the borough policy for reinforcing and improving the experience of the river and is relevant to any future application.
- 2.16 Bernie Spain Gardens to the immediate east of the site benefits at present from Gabriel's Wharf's very low-rise character and will be sensitive to overshadowing from any future development

## Building Heights

- 2.17 Building heights in the surrounding context are varied and include low-rise residential townscape to the south (c 9 – 12m), mid-rise cultural, residential, and commercial buildings, and tall buildings in both Lambeth and Southwark.
- 2.18 The Oxo Tower and surrounding historic warehouses enclose the east side of Bernie Spain Gardens with a traditional massing of between around 5 and 8 storeys. The Oxo building's feature tower is a landmark on the River Thames. The southern half of the Bernie Spain Gardens is faced by Coin Street Community homes - 2 to 4 storey housing, and a modest, 9 storey residential tower. Bernie Spain Gardens benefits from these generally low building heights. The tall buildings on Blackfriars Road are visible beyond but do not encroach.
- 2.19 The existing buildings on Princes Wharf rise to no more than around 3 storeys and its Neo Tudor frontage building at no. 58 Upper Ground is of similar height to the housing opposite.
- 2.20 The north bank of the River Thames is not generally characterised by tall building development. However, Waterloo, including the Southbank, is dotted with post-war and contemporary tall buildings these tend not to be right on the River frontage. The landmark buildings of the River Thames frontage are large but not tall (County Hall, Royal Festival hall, National Theatre etc. ) and provide another important height datum when viewed from the north bank and the Thames bridges.

### Wider height constraints

- 2.21 In recent years Lambeth has undertaken extensive work to understand the height constraints. These studies were in part driven to better understand the implications of tall building development at Waterloo on the Outstanding Universal Value of Westminster World Heritage Site but extended to cover other heritage constraints such as the setting of Somerset House.
- 2.22 Miller Hares' Westminster World Heritage Site Setting study, 2018' used digital modelling to map building height limits through strategic view policy constraints and major heritage asset settings. The extract for the site is below.

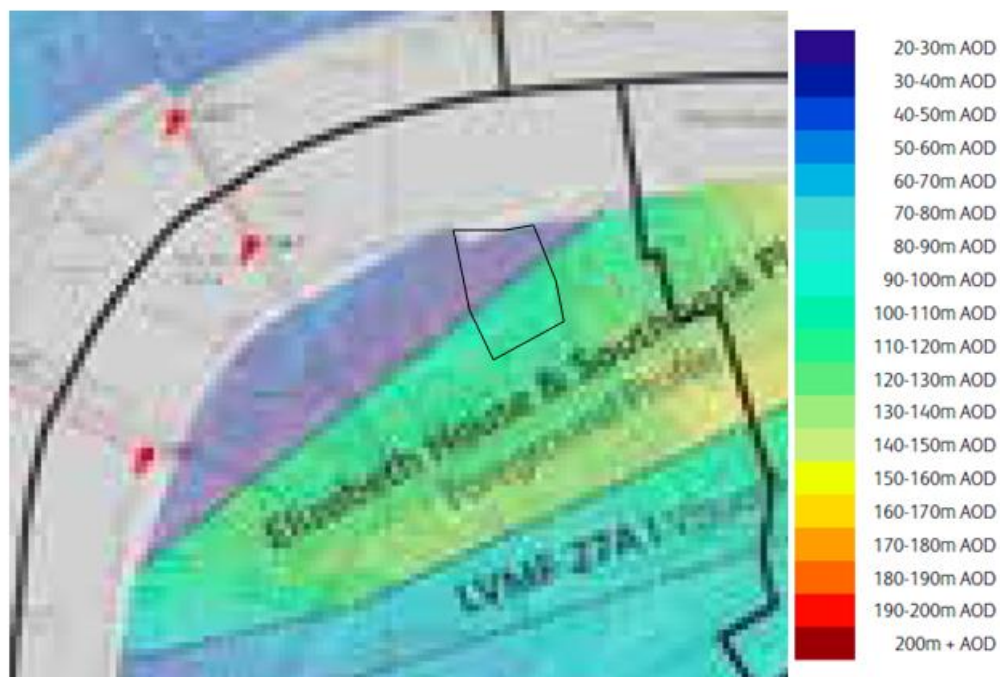


Figure 13 - The purple slice through the north of the site is the constraint placed on the site by Strategic View 8 (see later). The remainder of the site is covered by the 100m – 110m zoning which is dictated by sensitivity in relation to the setting of Somerset House (Grade I) from the view within its courtyard. Therefore, a height at the lower end of that range – 100m – 105m is desirable in order to ensure no heritage harm results. The same conclusion was reached for the adjoining former ITV site in the Waterloo Buildings Height Study, 2018.

### Site Uses

- 2.23 Gabriel's Wharf is occupied by food / drink and retail uses. Princes Wharf was occupied until recently as studio space by ITV. Across Bernie Spain Gardens, the Oxo Wharf complex is an artistic and creative hub with residential above. One block south from the busy riverside, and on the south side of Upper Ground, the Coin Street community is residential.

## Heritage Assets

### Designated Heritage Assets (DHA)

- 2.24 This part of Central London has a high concentration of designated heritage assets. The location is highly sensitive due to its frontage and contribution to panoramas along the river. Across the River Thames most of the north bank is designated as conservation areas in the City of Westminster and City of London, including The Strand CA (Westminster) and Temple CA (City of London) which stand immediately across the river from the site.
- 2.25 Westminster World Heritage Site - This end of the Queen's Walk is within the approaches to the World Heritage Site but not within its immediate setting. This means that particular attention should be paid to the quality of the public realm.

### Southbank Conservation Area

- 2.26 The Southbank Conservation Area extends from Westminster Bridge in the west to the borough boundary with Southwark and is characterised by an exceptional group of 20<sup>th</sup> Century buildings along the South Bank of the Thames. Landmark arts / culture and leisure buildings define the river front. Buildings are set in a generous, high-quality public realm which includes the Queen's Walk, Jubilee Gardens and Bernie Spain Gardens.
- 2.27 The area has a distinctive physical presence which comprises a layer of low office and cultural fronting the river and with a horizontal emphasis – such as County Hall, Royal Festival Hall, and the National Theatre. Behind inland, a second layer is punctuated by taller buildings such as the Shell Centre tower and the former ITV tower. The bend in the river allows the viewer to appreciate this townscape form.
- 2.28 Architecturally, the principal buildings within the conservation area typically have a calm and recessive architectural character sharing a harmonious palette of materials of Portland stone and pale concrete.
- 2.29 On the allocation site, the Princes Wharf Tudor Revival frontage building at no. 58 Upper Ground, being a well-designed survivor from the area's historic industrial past, is considered to make a positive contribution to the character and appearance of this Conservation Area. The remaining buildings on Princes Wharf and Gabriel's Wharf are not considered to have any heritage value.

### Westminster World Heritage Site Approaches

- 2.30 These are the public realm approaches to the World Heritage Site. Policy Q19 of the Lambeth Local Plan seeks to ensure a high quality environment is maintained for the benefit of visitors.

### Old Barge House Alley Conservation Area

- 2.31 To the east of Bernie Spain Gardens is the borough boundary with Southwark and here stands Southwark's small Old Barge House Alley Conservation Area – a surviving fragment of 19<sup>th</sup> Century wharf-side warehouse development, the principal feature of which is the OXO Building. It plays an important townscape role enclosing Bernie Spain Gardens and this has a positive effect on the setting of the Southbank Conservation Area.

### Waterloo Conservation Area

2.32 This conservation area lies a little distance to the South of the site. Its nearest buildings are those facing Bernie Spain gardens on the south side of Stamford Street. The Waterloo Conservation Area is extensive and includes parts of Waterloo Road, Cornwall Road and much of Stamford Street. The character is largely 19<sup>th</sup> Century urban.

### Statutory listed buildings

2.33 The following buildings are located in the environs of the site:

- The IBM building, Upper Ground (Grade II)
- Royal National Theatre, Upper Ground (Grade II\*)
- Somerset House (Grade I)

### Non-Designated Heritage Assets (NDHA)

2.34 The following buildings are located in the environs of the site:

- The river retaining wall and post-war sturgeon lamps (local list).
- 16 – 22 Barge House Street (Southwark draft Local List)

## **Designated Views**

### Strategic Views

2.35 The LVMF Linear View 8 ‘Westminster Pier to St Paul’s Cathedral’ cuts SW to NE across the south bank. It crosses the northern end of the site and places a height constraint here. The London View Management Framework (LVMF), 2011, states:

*‘170 development should preserve or enhance the viewers ability to recognise and appreciate the dome, peristyle and south-west tower of St Paul’s Cathedral. These elements should generally remain with a clear sky backdrop’.* The southern half of the site is not constrained by this view corridor.

2.36 LVMF View 14 ‘River prospect from Blackfriars Bridge’ captures the site which sits behind the OXO tower and in front of the former ITV tower in the view. The LVMF contains no site-specific guidance on this site / Southbank. However, it states:

*‘243 The development in the foreground and middleground should not obscure the landmarks in the view, and their scale, form orientation and materials should reference the scale and orientation of the river and the associated landscape.’*

2.37 LVMF View 15B.1 and 2. River prospect from Waterloo Bridge downstream looks towards St Paul’s Cathedral. The site is to the right of the view slightly beyond the former ITV tower with the Blackfriars cluster rising in the backdrop. The LVMF contains no specific advice in relation to this site / Southbank.

### Local Views

2.38 Local Plan Policy Q25 (c) identifies a number of the Lambeth panorama views that cover the entire north of Lambeth / Southwark. These include:



- (i) Views NNW from Brockwell Park to (c) N and NNE to the city
- (ii) View NNE from Norwood Park (across LB Southwark) to the city

**Routes, Access, Servicing and Public Realm**

2.39 Principal pedestrian access is from the heavy footfall Queen’s Walk. At Princes Wharf the Queen’s Walk is generous but there is a pinch point outside Gabriel’s Wharf as the Walk narrows. Pedestrians can also access from Upper Ground but this is very much a secondary route as the general pedestrian desire line to Upper Ground bypasses Gabriel’s Wharf and cuts diagonally across Bernie Spain gardens. The site layout technically allows vehicular access from Upper Ground onto the Queen’s Walk. Vehicular service access is from Upper Ground. Princes Wharf has ‘in’ and ‘out’ vehicle entrances incorporated into the façade of no. 58 Upper Ground.

**Trees**

2.40 London Planes lining the western side of Bernie Spain Gardens have canopies which over-sail into Gabriel’s Wharf. These trees are of high amenity value. Street trees on Upper Ground over sail the southern site boundary of Gabriel’s Wharf.

**Planning and Emerging Context**

2.41 Waterloo is designated as an Opportunity Area in the London Plan, 2020. Policy PN1 of the Lambeth Local Plan contains the neighbourhood policies for Waterloo and South Bank. The adjoining former ITV site has planning approval for redevelopment as a mixed-use residential and commercial scheme. A planning application has been submitted for a different scheme on that site.

**Site Constraints and Opportunities**

2.42 The following constraints and opportunities affect the site:

**Constraints**

Trees	Tree protection areas of the trees on Bernie Spain Gardens extend into the Gabriel’s Wharf site by approximately 9m. The street trees to Upper ground also present root constraints.
Views	London Plan’s Linear View 8 ‘Westminster Pier to St Paul’s Cathedral’ presents a height constraint to the northern end of the site
Party wall relationship with former ITV site	This irregular boundary line is a constraint to the efficient redevelopment of both sites.

Residential neighbours      The presence of residential properties immediately across Stamford Street is a material consideration.

**Opportunities**

Heritage      The positive contribution no. 58 Upper Ground makes to the Southbank Conservation Area presents an opportunity to sympathetically integrate the heritage of the area into a scheme and to enhance the character and appearance of the Southbank Conservation Area.

Bernie Spain Gardens      Redevelopment presents opportunity to improve the poor relationship between Gabriel’s Wharf and Bernie Spain Gardens.

Legibility      The existing public route through Gabriel’s Wharf isn’t legible. Redevelopment of the site presents the opportunity to address this with a better route along the side of Bernie Spain Gardens

Public Realm      There is an opportunity to widen the Queen’s Walk in front.

Building lines      Redevelopment presents the opportunity to reinstate building lines along Upper Ground and to positively respond to Queen’s Walk by providing more public realm here. This presents an opportunity to enhance the River Thames frontage and pedestrian comfort levels.

### 3. Design Approach

#### Key Principles

3.1 In seeking to achieve a design-led optimisation of the site, site-specific design drivers include:

#### **A** Respect Heritage Assets

Cause no harm to the significance or setting of designated or non-designated heritage assets

In particular:

- Preserve or enhance the character or appearance of the Southbank Conservation Area in particular in relation to views from River Thames /Queen's Walk, Bernie Spain gardens and Upper Ground
- Preserve no. 58 Upper Ground
- Preserve the setting of the Old Barge House Alley Conservation Area (Southwark)

#### **B** Bulk / Scale and Mass

- Mediate building heights to ensure the scheme is well integrated with its larger scale neighbours to the west and yet is responsive to the lower-rise character of its context to the south and east
- Respect the Strategic Linear View 8 from Westminster Pier to St Paul's Cathedral.
- Avoid appearing in the setting of Somerset House as viewed from its courtyard entrance.

#### **C** Protect trees / Bernie Spain Gardens

- Have a building line which does not harm the root protection zones and allows for construction / future growth
- Ensure that the amenity value of Bernie Spain Gardens is not diminished by undue overshadowing or enclosure.

#### **D** Respect established building lines

- On Upper Ground continue the building line established by no. 58 Upper Ground in order to integrate the historic building into the development
- On Queen's Walk, set back the building line to give more space to the public realm and allow for entry and egress from the development

#### **E** Ensure new routes are safe and legible

- Improve the relationship with Bernie Spain Gardens by straightening the path along its western edge and creating good natural surveillance through active ground floor frontages and upper floor fenestration.
- Omitting a public route through the site in order to focus footfall and activation along the western edge of Bernie Spain Gardens

- Respond positively to the proposal on the adjoining ITV site by straightening the current kink in the party wall building line on the western side of Princes Wharf.

**F Transport**

- The east, north and west frontages of the development to be vehicle free pedestrian places.

**F Neighbour and future occupier amenity**

- Ensure no unacceptable impacts on the amenity of neighbours
- Ensure new occupiers have adequate amenity

## **4. Indicative Approach**

### **Indicative Approach - Overview**

- 4.1 The Indicative Approach retains the Tudor style frontage building (no. 58 Upper Ground) and creates an outward-facing podium office block with two residential blocks on top of its southern end with rooftop amenity space. The podium office approach accords with the planning proposals on the adjoining former ITV site (21/02668/EIAFUL - application not determined at time of writing).
- 4.2 Retail, food and drink, leisure and culture uses are placed along the ground floor to the western (former ITV), northern (Queen's Walk) and eastern (Bernie Spain Gardens) frontages of the site. To the southern frontage (Upper Ground) residential and offices entrances are considered most appropriate. The retained Neo-Tudor revival building at no. 58 Upper Ground could accommodate a separate commercial use, be incorporated into the podium, or provide cores to the residential accommodation.

### **Indicative Approach - Layout and Access**

- 4.3 The western party wall boundary to the former ITV site has been straightened to remove the kink and positively respond to current scheme for the ITV site which provide for a public pedestrian route here. The site will therefore have pedestrian accessible frontages to all four sides. Vehicular access/ servicing is from Upper Ground.
- 4.4 A setback to the northern edge of the site improves public realm to the Queen's Walk's bottle-neck. The eastern building line to Bernie Spain Gardens is pulled back from the current fence line by at around 9m in order to be respectful of tree constraints and avoid undue overshadowing to the Gardens. The building line here aligns closely with that of Duchy Street to the south and thus provides a more legible pedestrian route when viewed from Stamford Street. This pulled-back eastern building line also allows the creation of a piazza space fronting onto the Bernie Spain Garden - suitable for outdoor seating supporting the active ground floor frontages, or as an extension to Bernie Spain Gardens itself.
- 4.5 The indicative approach respects the historic building line of no. 58 Upper Ground creating improved street enclosure where this eastern part of the Southbank Conservation Area which transitions into the more intimate urban townscape of the Old Barge House Alley Conservation Area to the east.

### **Indicative Approach – Massing and General Building Height**

- 4.6 The Indicative Approach massing comprises a general height of c 44m (five commercial storeys and five residential). The residential blocks are placed at the southern end of the podium to respect the strategic view and reflects the established character of the Southbank where taller buildings are generally set back from the river edge. The height would be significantly lower than that currently approved and proposed for the adjoining former ITV site and would thus allow the massing to step down eastward towards Bernie Spain Gardens and the Old Barge House Alley Conservation Area. At the height shown the Indicative Approach will not be visible from Somerset House courtyard entrance to avoid harming the setting of that Grade I listed building.



Figure 14 - Aerial view of Indicative Approach massing

#### Indicative Approach - Daylight and Sunlight

4.7 In planning the Indicative Approach the objective has been to ensure that it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours (the locations of which are identified in the draft site allocation policy), and to the quality of new residential accommodation on the site. That said, any scheme that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209)' and relevant Mayoral policy and guidance.

4.8 A detailed assessment of the daylight and sunlight implications of this Indicative Approach, undertaken by the Council's specialist advisers, is provided separately.

#### Indicative Approach – Quanta

4.9

Use	Amount
Residential units	51
Office	30,250 sqm GIA
Retail / culture / food	3230

## 5. Appraisal of the Indicative Approach

### Townscape and Visual Impact Assessment (TVIA)

- 5.1 The appraisal of the visual effects of the Indicative Approach has been informed in large part by use of the VU CITY 3D digital model of London. The model is a very accurate representation of London today as a series of simple, grey built forms. Approved schemes can be added to the model for assessment purposes; these are generally coloured yellow.
- 5.2 A simple scaled model of the Indicative Approach in the form of a basic extrusion of the Indicative Approach footprint, is dropped into the model and its visual impact captured from a range of vantage points. For ease of identification, it is coloured. The resulting impact is assessed and model refined until an acceptable impact is achieved in all tested views.
- 5.3 A townscape and visual impact assessment has been undertaken with three principal objectives:
- firstly, to ensure that the impact on Strategic and Local views is acceptable in relation to view composition and appreciation.
  - secondly, to ensure that the townscape effects of the development are acceptable; in this regard the starting point has been that a degree of noticeable townscape change is inevitable but it should not be discordant or unduly dominant in its context; and
  - thirdly, to ensure no harm to the significance (including setting) of heritage assets.
- 5.4 In accordance with best practice there has been no presumption that change within the setting of heritage assets is automatically harmful. Instead, the contribution of setting to the significance of the asset has been at the forefront of assessments and thus how that significance might be influenced by changes to the context.
- 5.5 This height and massing exercise has informed conclusions about whether the site is an appropriate location for a tall building(s) as defined by Policy Q26 of the Lambeth Local Plan. The indicative approach is considered to constitute the optimum level of development capacity for the site. This does not preclude other possible approaches to optimisation coming forward, in different forms, through the planning process.
- 5.6 Eight views were tested to understand the impact of the Indicative Approach on its context. The detailed analysis on each view is contained in Appendix 1 and the findings are summarised below:

TVIA view 1 – Westminster Pier to St Paul’s Cathedral	The indicative approach is screened from view by the ITV approval (17/03986/FUL) which is modelled here in blue. The yellow tower is the Doon Street approval. The view composition is respected. There is no harm to the view.
TVIA view 2 – King Henry VIII’s Mound, Richmond to St Paul’s Cathedral	The proposal is not visible. There is no impact on the protected linear view.

TVIA view 3 – Blackfriars Bridge	The indicative approach is visible behind the OXO tower and in front of the ITV tower. In this model the existing ITV tower is shown. It should be noted that the ITV approval tower (17/03986/FUL) is slightly taller. The role of the indicative approach as an extra layer within the townscape is not considered problematic. The OXO tower has lost none of its landmark quality. There is no harm.
TVIA view 4 – Waterloo bridge	The indicative approach rises above the trees in the foreground of the Blackfriars cluster. It very much reads as a subordinate built form in this context. The stelling down of the indicative approach from left to right sits comfortably with the other foreground buildings- OXO tower and Sea Containers. There is no harm.
TVIA view 5 - Roupell Street looking north along Windmill Walk	The indicative approach is very slightly visible above the roof line of no. 12 Theed Street. The effect will be slightly greater if the viewer stands slightly further south but will disappear from view as the viewer moves northwards. It is only in this gap in the frontage that the scheme is visible. Given the above the effect on the character of the conservation area as a whole is negligible. No harm to the setting of the listed buildings or to the conservation area
TVIA view 6 – Upper Ground	The indicative approach's lower floors complement the mass of no. 58 Upper Ground. The upper floors of the indicative approach rise up in the immediate backdrop of the retained building but the setback, the staggered massing and the height differences ensure that the effect is not unduly dominant and help reinforce a much-needed sense of enclosure.
TVIA view 7 – Upper Ground near Broad Wall	For clarity purposes all of the trees have been removed from the model. The lower mass of the indicative approach can be seen in blue enclosing the western side of Bernie Spain gardens. Behind, the taller elements step up to largely screen the existing ITV Tower from view. It should be noted that the ITV approval (17/03986/FUL) has a slightly taller tower so the stepped effect will be more noticeable. The trees will provide significant screening. The townscape effect is not harmful.
TVIA View 8 – Junction of Stamford St. and Duchy St.	The lower mass of the indicative approach can be seen in blue enclosing the western side of Bernie Spain gardens. Behind, the taller elements step up. In reality, the trees will provide significant screening in this view. The townscape effect is not harmful.



## Effect on Heritage Assets

5.7 The Indicative Approach has been assessed for its effect on the significance (including setting) of heritage assets. This has required an understanding of the significance of each asset and especially the contribution that the setting makes to that significance. The objective has been to ensure no adverse effect on significance.

5.8 The setting of a heritage asset is defined as:

*'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (NPPF, Annex 2: Glossary).'*

5.9 Historic England's guidance 'The Setting of Heritage Assets' states:

*'9 Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage.*

### *Views and setting*

*10 The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.*

*11 Views which contribute more to understanding the significance of a heritage asset include:*

- 1. those where the composition within the view was a fundamental aspect of the design or function of the heritage asset.*
- 2. those where town- or village-scape reveals views with unplanned or unintended beauty.*
- 3. those with historical associations, including viewing points and the topography of battlefields.*

*those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected those where relationships between the asset and other heritage assets or natural features or phenomena such as solar or lunar events are particularly relevant '*

5.10 The HE guidance suggests the steps are as follows:

**Step 1:** *Identify which heritage assets and their settings are affected.*

**Step 2:** *Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.*

**Step 3:** *Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it.*

**Step 4:** Explore ways to maximise enhancement and avoid or minimise harm.

**Step 5:** Make and document the decision and monitor outcomes.

### **Asset and Significance**

Southbank Conservation Area – this is largely post-war in character with a small number of buildings from the area’s pre-war character including no. 58 Upper Ground. The development at the eastern end of the conservation area comprises post-war buildings of brutalist character and solid mass. The conservation area includes the open space at Bernie Spain gardens but none of the housing.

The conservation area has been subject to significant change in recent years with the completion of the Southbank Place development (Shell Centre) and further change is anticipated with the redevelopment of the ITV site. increased densities are characteristic of the conservation area’s evolution.

Westminster World Heritage Site Approaches – the public real approaches to the world heritage site

Westminster World Heritage Site – Waterloo lies within the immediate and wider setting

Old Barge House Alley Conservation Area (LB Southwark) – this is a small conservation area of 19<sup>th</sup> and early 20<sup>th</sup> Century commercial buildings including the OXO building. The conservation area is separated from the site by Bernie Spain Gardens.

Somerset House (Grade I) (City of Westminster) – Views from within the courtyard of Somerset House are

### **Effect**

The retention of no. 58 Upper Ground will preserve the only building of value on the site. The widening of the Queen’s Walk and the creation of a new piazza / gardens extension to the east of the site will both be beneficial to the character and appearance of the conservation area. See TVIA views 4, 6, 7, and 8.

The design approach of a podium with development atop accords closely with the emerging proposals for the ITV scheme and comprehensive development of both sites, bring within them animation and active leisure and culture uses to the Queen’s Walk will reinforce the character and appearance of the conservation area. On balance the effect on the conservation area will be beneficial. See TVIA views 4, 6, 7, and 8.

The widening of the Queen’s Walk will be beneficial.

The site is not within the immediate setting. Nor is the Indicative Approach height visible in the wider setting (backdrop) of the WWHS). No effect of the Outstanding Universal Value.

The Indicative approach will have a neutral effect on the setting of the conservation area. See TVIA view 3.

The indicative approach is not visible from within the courtyard of Somerset House. There will be no effect on the setting.

sensitive to tall building development south of the River.

National Theatre (Grade II\*) and IBM Building, Upper Ground (Grade II) – both buildings are separated from the site by the large ITV site.

The upper floors of the Indicative approach will be visible in the wider cityscape views of both of these buildings but will be off to one side and separated by the ITV scheme. Given the modest height, the separation distances, and the robust nature of the IBM and NT buildings the effect is considered neutral. See views 3 and 4.

The river retaining wall and post-war sturgeon lamps (local list).

These are in front of the National Theatre. The Indicative Approach will have no effect on their significance or setting.

16 – 22 Barge House Street (Southwark draft Local List)

These are to the rear of the OXO Tower. The Indicative Approach will have no effect on their significance or setting.

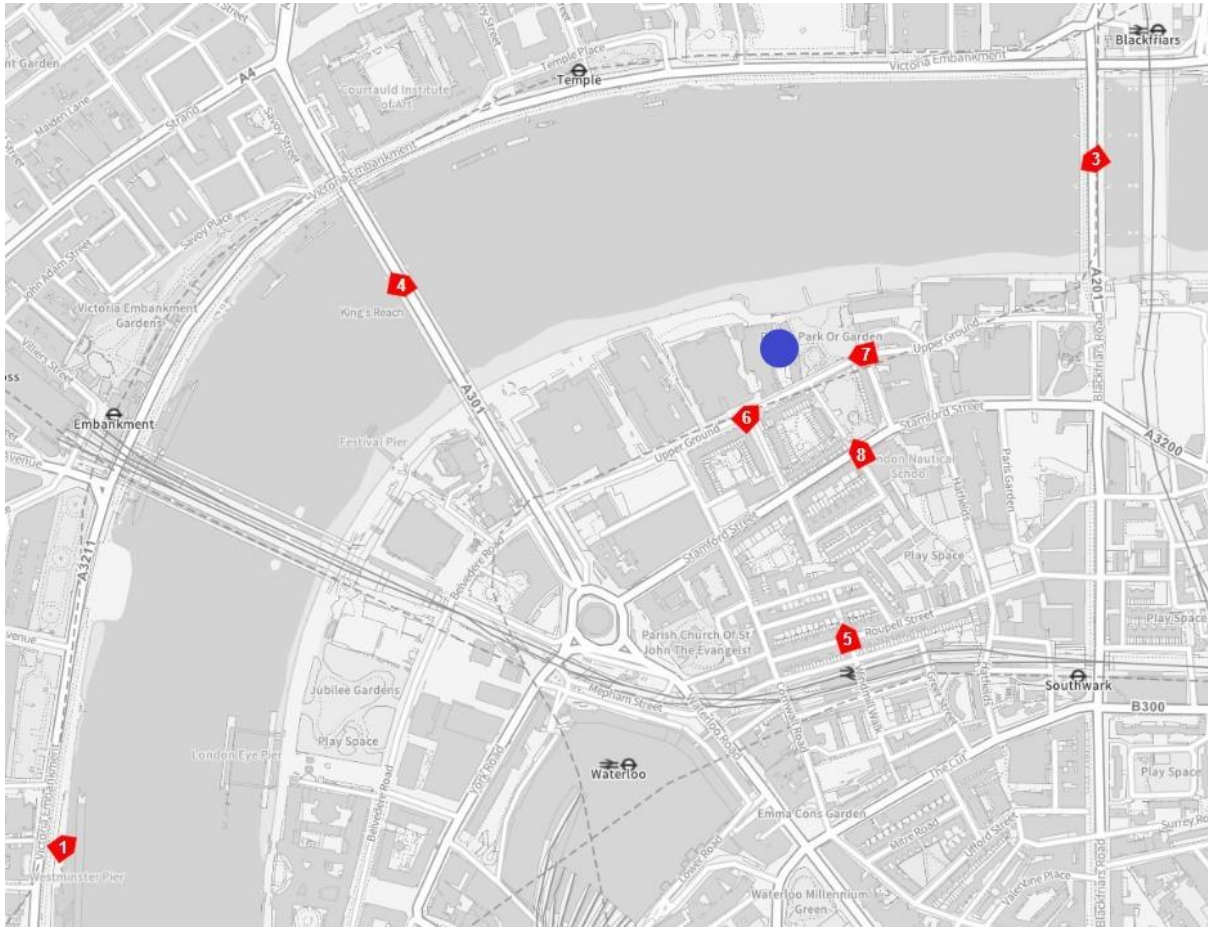
## 6. Conclusion

- 6.1 The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure acceptable impacts in relation to daylight and sunlight, views, townscape, and heritage. This analysis has found the approach to successfully address the various opportunities and constraints identified. In light of this work, it is recommended that the site allocation policy includes the design points outlined in the table below.

<b>Topic</b>	<b>Recommendation</b>
Heritage	Preserve or enhance the significance of Southbank Conservation Area by retaining no. 58 Upper Ground and ensuring a high quality design well integrated with its context.
Public Realm	Enhance the approaches to Westminster World Heritage Site by widening Queen's Walk  Continue the building line on Upper Ground established by no. 58 Upper Ground
Height and Massing	The site is not appropriate for a tall building, defined as above 45m in this location. Taller elements of up to 44m are possible south of the LVMF view cone.  Limit height on northern part of the site to respect the Strategic Linear View 8 from Westminster Pier to St Paul's Cathedral.  Place greatest height at southern end of the site and step massing down to the east.
Trees	Respect the trees adjoining the site and anticipate their long-term growth and management when considering building footprints.

## APPENDIX 1 Townscape and Visual Impact Analysis

### Reference map



Wider views not shown on map

**TVIA view 2** – Strategic View 9 - King Henry VIII's Mound, Richmond to St Paul's Cathedral

**TVIA view 4** – Waterloo bridge

**TVIA view 1 – Westminster Pier to St Paul’s Cathedral**

**View Location Map**



**View Location Description**

This is LVMF View 8. Westminster Pier is a publicly accessible place on the north bank of the Thames opposite County Hall. St Paul's Cathedral is framed to the left by the Royal Festival Hall and framed to the right by the Whitehouse Apartments.

**Existing View Photo**



### Digital Twin VU CITY Image

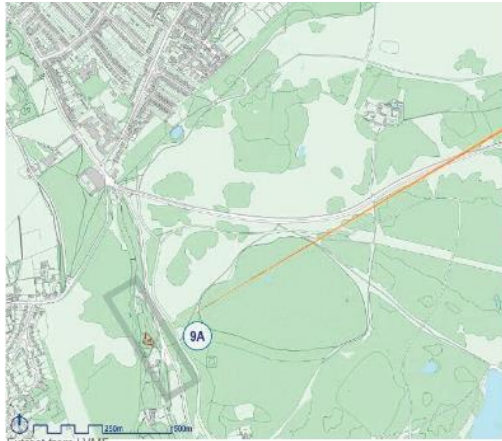


### Narrative on Effect of Indicative Approach

The front part of the indicative approach has low massing to ensure it does not appear in front of St Paul's Cathedral. The taller part of the indicative approach (to left of St Paul's is screened from view by the ITV approval (17/03986/FUL) which is modelled here in blue. The yellow tower is the Doon Street approval. The view composition is respected. No harm to the view.

**TVIA view 2 – Strategic View 9 - King Henry VIII’s Mound, Richmond to St Paul’s Cathedral**

**View Location Map**



**View Location Description**

Richmond Park was first enclosed by Charles I and is the largest of London’s Royal Parks. King Henry VIII’s Mound is reputedly a Bronze Age barrow, much altered. It provides magnificent views across the Thames to Twickenham and the North Downs to the west. To the east, the dome and peristyle of St Paul’s Cathedral can be seen through an avenue of trees both from the mound and from the footpath in front.

The view offers a truly unique view of one of London’s best-known landmarks, ten miles away – St Paul’s Cathedral.

**Existing View Photo**





**Digital Twin VU CITY Image**



**Narrative on Effect of Indicative Approach**

The proposal is not visible. There is no impact on the protected linear view.

### TVIA view 3 – Blackfriars Bridge

#### View Location Map



#### View Location Description

This is LVMF View 14. The view location is Blackfriars Bridge looking upstream. It provides a broad prospect of the River Thames with both banks visible.

For the purpose of analysis, the camera is turned towards the south bank of the Thames. The Sea Containers building is on the left. The ITV tower and OXO tower overlap in the centre of the view.

#### Existing View Photo



### Digital Twin VU CITY Image

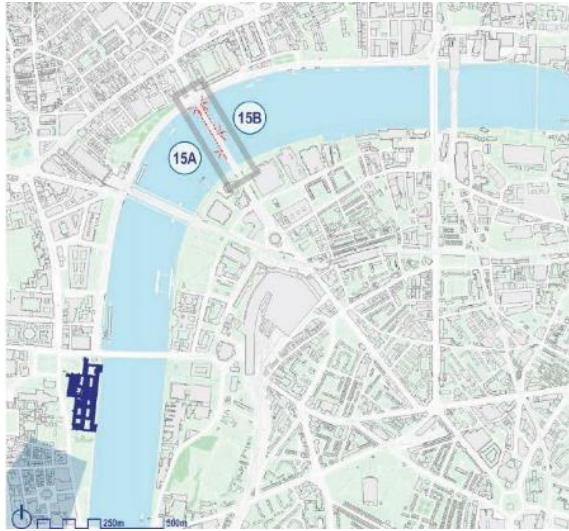


### Narrative on Effect of Indicative Approach

The indicative approach is visible behind the OXO tower and in front of the ITV tower. In this model the existing ITV tower is shown. It should be noted that the ITV approval tower (17/03986/FUL) is slightly taller. The role of the indicative approach as an extra layer within the townscape is not considered problematic. The OXO tower has lost none of its landmark quality. No harm.

## TVIA view 4 – Waterloo bridge

### View Location Map



### View Location Description

This is LVMF View 15B. Waterloo Bridge looking down stream. It provides a broad prospect of the River Thames with both banks visible.

For the purpose of analysis, the camera is turned towards the south bank of the Thames. The ITV tower can be viewed in the foreground with the IBM roofscape just visible to the right. The Shard visible in the centre of the image. The cluster of tall buildings at Blackfriars Road is visible on the left.

### Existing View Photo



### Digital Twin VU CITY Image



### Narrative on Effect of Indicative Approach

The indicative approach rises above the trees in the foreground of the Blackfriars cluster. It very much reads as a subordinate built form in this context. The stepping down of the indicative approach from left to right sits comfortably with the other foreground buildings; OXO tower and Sea Containers. No harm.

**TVIA view 5 - Roupell Street looking north along Windmill Walk**

**View Location Map**



**View Location Description**

This is within the Roupell Street Conservation Area looking north.

The positive contributor buildings framing the view are nos 61 and 62 Roupell Street (Grade II listed). The building terminating the view is no. 12 Theed Street, which is a positive contributor to the Waterloo Conservation Area. To the left of the lamp post the ITV tower can be glimpsed.

**Existing View Photo**



### Digital Twin VU CITY Image



### Narrative on Effect of Indicative Approach

The indicative approach is very slightly visible above the roof line of no. 12 Theed Street. The effect will be slightly greater if the viewer stands slightly further south but will disappear from view as the viewer moves northwards. It is only in this gap in the frontage that the scheme is visible. Given the above the effect on the character of the conservation area as a whole is negligible. No harm to the setting of the listed buildings or to the conservation area.

**TVIA view 6 – Upper Ground**

**View Location Map**



**View Location Description**

The viewer is at the corner of Coin Street and Upper Ground.

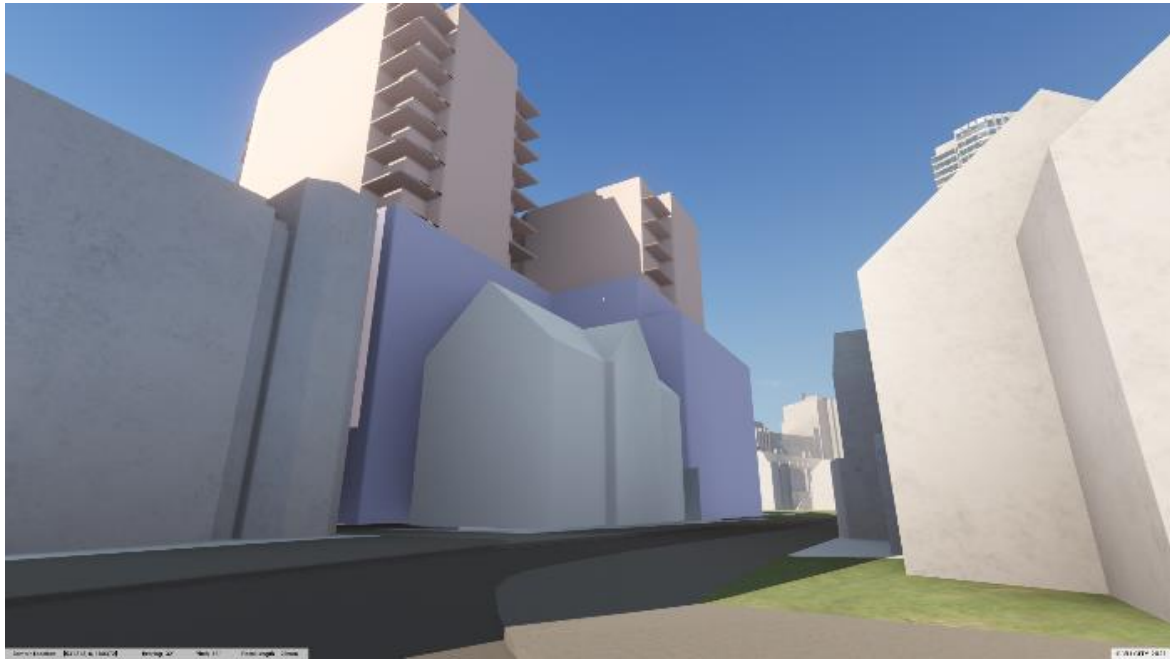
Looking NE towards the site the Tudor Revival style building of Princes Wharf (58 Upper Ground) is seen obliquely with its gable visible. The gable on the right is that of no. 93 Upper Ground which sits on the corner with Coin Street. The frontage of ITV complex is visible to the left. One of the tall buildings of the Blackfriars Road cluster can be glimpsed over the roof tops.

**Existing View Photo**





### Digital Twin VU CITY Image



### Narrative on Effect of Indicative Approach

The indicative approach's lower floors complement the mass of no. 58 Upper Ground. The upper floors of the indicative approach rise up in the immediate backdrop of the retained building but the setback, the staggered massing and the height differences ensure that the effect is not unduly dominant and help reinforce a much-needed sense of enclosure.

**TVIA view 7 – Upper Ground near Broadwall**

**View Location Map**



**View Location Description**

Near the borough boundary with Southwark looking along Upper Ground.

Bernie Spain Gardens flanks the foreground roadway. The ITV tower is visible on the right beyond the trees. Townscape value medium / high due largely to the soft landscaped foreground.

**Existing View Photo**



## Digital Twin VU CITY Image



### Narrative on Effect of Indicative Approach

For clarity purposes all of the trees have been removed from the model. The lower mass of the indicative approach can be seen in blue enclosing the western side of Bernie Spain gardens. Behind, the taller elements step up to largely screen the existing ITV Tower from view. It should be noted that the ITV approval (17/03986/FUL) has a slightly taller tower so the stepped effect will be more noticeable. The trees will provide significant screening. The townscape effect is not harmful.

**TVIA view 8 – Junction of Stamford St. and Duchy St.**

**View Location Map**



**View Location Description**

The viewer is standing at the junction of Stamford Street and Duchy Street looking north along Duchy Street. Mature trees at the southern end of Bernie Spain Gardens screen much of the view. The Coin Street Community Housing can be seen to the left addressing Bernie Spain Gardens.

**Existing View Photo**



### Digital Twin VU CITY Image



### Narrative on Effect of Indicative Approach

For clarity all the trees have been removed from the model. The lower mass of the indicative approach can be seen in blue enclosing the western side of Bernie Spain gardens. Behind, the taller elements step up. In reality, the trees will provide significant screening in this view. The townscape effect is not harmful.