

# Lambeth Site Allocations DPD – Proposed Submission Version

Design Evidence

SA1 Royal Street, SE1



September 2023

## Contents

<b>Part</b>	<b>Content</b>	<b>Page</b>
<b>1.0</b>	<b>Introduction</b>	2
<b>2.0</b>	<b>Site Appraisal and Analysis</b>	4
2.1	Site Overview	4
2.2	Site and Context Photographs	5
2.3	Site Character and brief History	11
2.9	Historical Maps	15
2.10	Site Context	16
2.19	Heritage Assets	18
2.33	Designated Views	19
2.53	Routes, Access, Servicing and Public Realm	27
2.55	Trees	28
2.57	Planning and Emerging Context	29
2.59	Site Constraints and Opportunities	29
<b>3.0</b>	<b>Design Approach</b>	31
3.1	Key Principles	31
<b>4.0</b>	<b>Indicative Approach</b>	33
4.1	Indicative Approach - Overview	33
4.2	Indicative Approach – Layout and Access	33
4.4	Indicative Approach – Massing and General Height	34
4.7	Indicative Approach – Daylight and Sunlight	35
<b>5.0</b>	<b>Appraisal of Indicative Approach</b>	36
5.7	Effect on Designated Views	36
5.8	Effect on Townscape	39
5.9	Effect on Heritage Assets	40
<b>6.0</b>	<b>Conclusion</b>	48
<b>Appendix 1</b>	<b>Townscape and Visual Impact Assessment</b>	49

## 1. Introduction

- 1.1 This 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. It is an updated version of the Regulation 18 evidence and has been informed by the consultation responses received during the Regulation 18 consultation and any further work that resulted from that consultation.
- 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 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 The following changes have been made following the Regulation 18 Consultation:
  - The site area has been corrected from 7.2ha to 2.32ha.
  - Building heights and locations amended to address Historic England concerns regarding impact on World Heritage Site.

- No significant change to other development principles.

1.7 The maps in this document are reproduced by permission of Geographers' A-Z Map Co. Ltd.  
Licence No. C0466

© Crown copyright and database rights 2021 Ordnance Survey 100017302

© Crown Copyright and database right 2021. Ordnance Survey 100019338

## 2. Site appraisal and analysis

### Site Overview

2.1 Principal details of the site are outlined below:

Site Address Land to north and south of Royal Street and to the east side of Lambeth Palace Road comprising Canterbury house, no. 10 Royal Street, former school and car park, Carlisle Lane; and Beckett House and Stangate House, Lambeth Palace Road



Figure 1 – Site allocation boundary.



## Site and Context Photographs

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



Figure 2 - View from northern end of Archbishop's Park looking northeast towards Lambeth Palace Road with St Thomas' Hospital (left) and the former Christ Church school (right).



Figure 3 – View from northern end of Archbishop's Park looking north towards the northern boundary adjoining the former Christ Church school (left) and Carlisle Lane car park (right)



Figure 4 – No. 10 Royal Street’s flank to Lambeth Palace Road



Figure 5 – Lambeth Palace Road looking north from the entrance of Archbishop’s Park. St Thomas’ Hospital campus is on the left. To centre is Park Plaza Hotel and to right are Urbanest building and Stangate House





Figure 6 – Lambeth Palace Road looking south towards the entrance into Archbishop's Park



Figure 7 – former Christchurch School as viewed from the western side of Lambeth Palace Road





Figure 8 – Beckett House, Lambeth Palace Road



Figure 9 - Meanwhile use Oasis Farm's barn and polytunnels fronting Royal Street



Figure 10 – Canterbury House, Royal Street



Figure 11 - Rear of Canterbury House as viewed from Upper Marsh





Figure 12 - Railway viaduct at Carlisle Lane / Royal Street intersection.



Figure 13 - Railway Viaduct at rear of Canterbury House

## Site Character and Brief History

2.3 Upper Ground is an ancient route which once crossed the Thames marshlands, and which connects through to Lower Marsh and The Cut. Royal Street was laid out in the 19<sup>th</sup> Century. The current alignment of Lambeth Palace Road's northern end dates from the 1960s when the road was re-aligned to accommodate the expansion of the St Thomas' Hospital campus. Carlisle Lane runs north south along and below the railway viaduct and connects to Westminster Bridge Road at the north. It provides the access into the car park and into the former Christ Church School property which lie along the northern boundary of Archbishops Park. At the School vehicular entrance, a small pocket park sits on the corner of Carlisle Lane and Royal Street. It is hard paved with several trees.

2.4 The properties / land comprises:

Former Christ Church School,  
Carlisle Lane

Established in the 1850s it has been altered and extended over time – low rise, single storey in stock brick and slate. It is deemed to make a positive contribution to the Lambeth Palace Conservation Area. Figure 14 below.



Temporary Oasis Farm and office buildings in grounds of former school.

Timber framed structures – a barn, polytunnels and single storey offices. They are within the Lambeth Palace Conservation Area but are considered to make a neutral contribution. Figure 15 below.



Car park accessed off Carlisle Lane

Created on land cleared in the post-war period. Within the Lambeth Palace Conservation Area. Figure 16 below.





Beckett House, Lambeth  
palace Road

A 1970s office by YRM in brown polished granite, including front lawn (sculpture) and rear area. This building is not within a conservation area and is not considered to be a non-designated heritage asset. Figure 16 below.



South of the River sculpture

Grade II listed piece on forecourt of Beckett House fronting Lambeth Palace Road. Figure 17 below.



Stangate House, Lambeth  
palace Road

A 1950s residential point block in stock brick. This building is not within a conservation area and is not considered to be a non-designated heritage asset. Figure 18 below.



Canterbury House, Royal Street

A 1950s residential Corbusian style slab block including front lawn and rear car park. This building is not within a conservation area and is not considered to be a non-designated heritage asset. Figure 19 below.



No 10 Royal Street

An Edwardian former institute (much altered) on corner with Lambeth Palace Road. The building is deemed to make a positive contribution to the Lambeth Palace Conservation Area. Figure 20 below.





Figure 21 – Aerial view of the site from the south. The buildings on the south side of Royal Street are within the Lambeth Palace Conservation Area.

- 2.5 A realignment of Lambeth Palace Road in the 1960s was undertaken to allow the St Thomas' Hospital campus to expand eastwards to meet the new road. On the eastern side of Lambeth Palace Road post-war blocks were erected to the new road alignment –these are Stangate House (the name Stangate has long connections with this locality) and Beckett House (named after an Archbishop of Canterbury) and Canterbury House, Royal Street.
- 2.6 The car park on the south side of Royal Street once contained Christ Church and its Vicarage but these were cleared in the post-war years. Two historic buildings still survive on the south side of Royal Street. The first, is no. 10 Royal Street is a two-storey red brick Edwardian former institute on the corner of Royal Street and Lambeth Palace Road. The second is the former Church of England Primary School, which is accessed off Carlisle Lane, dates from the 1850s. Both buildings stand within the Lambeth Palace Conservation Area along with the car park. In the planning appeal decision relating to the Founder's Place scheme dating from 2007, it was found that no. 10 Royal Street made a negative contribution to the special interest of the conservation area (due to its poor condition) whilst for former Primary School made a positive contribution. That decision allowed the demolition of both buildings. Since that time the Lambeth Palace Conservation Area Character Appraisal, 2017 has been produced. It concludes that both buildings make a positive contribution but is silent on the adjoining car park. The meanwhile office and farm buildings are considered to make a neutral contribution to the Lambeth Palace Conservation Area.
- 2.7 The school site and car park enclose the northern side of Archbishops Park and that boundary is lined by a mature trees standing within the park; these are subject to a Tree Preservation Order (TPO no 452).



- 2.8 On the corner of Royal Street and Lambeth Palace Road a large electronic billboard (portrait) stands against the flank of no. 10 Royal Street.

### Historical Maps

- 2.9 The maps below illustrate the historic development of the locality.



Figure 22 - 1860s OS map – The open space to the south is today's Archbishop's Park. The original school footprint can be seen to its north. Trinity Church and vicarage occupy the site of today's car park. At that time Carlisle Lane was known as Carlisle Street. Railway viaduct is on the right.

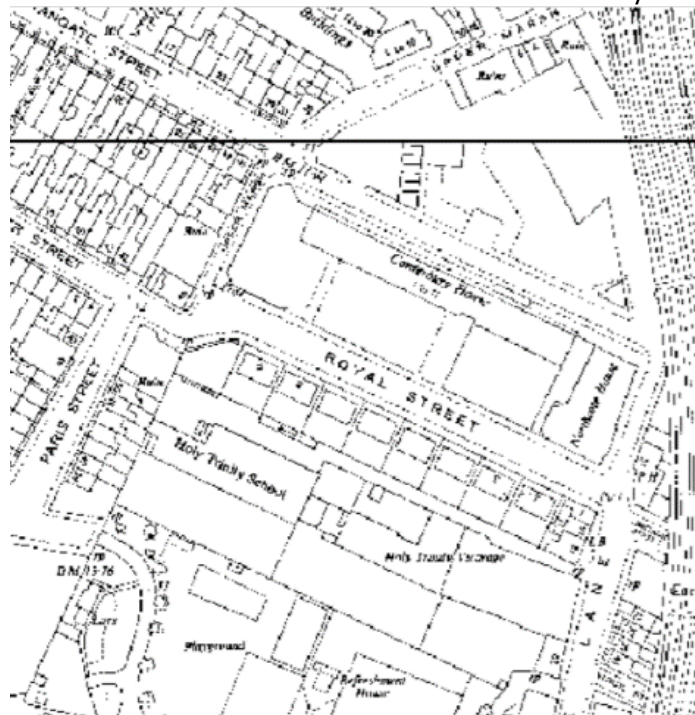


Figure 23 - late 1950s OS map – The current school footprint can be seen. Terraced housing on Royal Street, the church, and vicarage were lost to enemy action and have been replaced by prefabricated housing and Canterbury House. Lambeth Palace Road has not yet been realigned to its current configuration.



## Context

### Local Character

- 2.10 Lambeth Palace Road's northern end is wide and exposed and characterised almost completely by large buildings dating from the second half of the Twentieth Century. The site frontage buildings here are Stangate House and Beckett House. To the north of Beckett House, outside the site allocation, is the Urbanest Building by AHMM architects.
- 2.11 To the south of the site, Archbishop's Park and the adjoining private gardens of Lambeth Palace are within the Lambeth Palace Conservation Area. The entire St Thomas' Hospital campus to the west sits within the Albert Embankment Conservation Area. To the north, County Hall and the Park Plaza Hotel, Westminster Bridge Road sit within the Southbank Conservation Area.
- 2.12 Whilst the architectural character is varied, the 1970s buildings on the St Thomas' Campus by Yorke Rosenberg Mardall (YRM) architects are clad in a pale tile which closely mimics the appearance of Portland stone in distant views (to complement County Hall and the character of the City of Westminster opposite). The use of Portland stone or tile / concrete which mimics its appearance is one of the locally distinctive characteristics of development in this part of central London. Urbanest Building by AHMM is also coloured white for this reason.
- 2.13 The Lambeth Palace Conservation Area exhibits a different character which, like much of the wider locality moving away from the Central Activity Zone, it is low rise and largely characterised by brick buildings. This can be seen in the buildings visible from Archbishop's Park including the recently completed Lambeth Palace Library. The exception, rightly, is Lambeth Palace's Blore Building (the main house) which is in ashlar sandstone, reflecting its high status function as the official London residence of an Archbishop.
- 2.14 The Palace of Westminster stands immediately across the River Thames from St Thomas' Hospital. The Palace, along with Westminster Abbey and St Margaret's Church are a World Heritage Site. For ease it is generally referred to as the Westminster World Heritage Site (WWHS).
- 2.15 The open landscape character of Lambeth Palace's gardens and Archbishop's Park are a key component of local distinctiveness and important open spaces within the Lambeth Palace Conservation Area.

### Building Heights

- 2.16 Building heights vary greatly within the locality but in very general terms they are lower to the south of the site. For example, the heights within the Lambeth Palace Conservation Area are largely low – 6m (two storeys) to 12m (four storeys) although the new Lambeth Palace Library is a notable exception. Within the St Thomas' Hospital campus, the heights vary greatly too; with the surviving Victorian wings generally being 6 storeys. The tallest blocks are the North Wing and East Wing which stand at 57m AOD. At the northern end of the hospital campus Gassiot House is 32m AOD. Opposite, within the Southbank Conservation Area County Hall's roof ridge stands at c39m and the County Hall South Block at 36m.
- 2.17 Within the site the post-war buildings are the tallest - Beckett House stands as 53m AOD, Stangate House at 47m AOD and Canterbury House at 36m AOD.

## Building Uses

- 2.18 Beckett House is an office, Stangate House and Canterbury House are residential, the former school contains meanwhile employment uses and a community farm. There are also two areas of surface car parking – at Carlisle Lane and at rear of canterbury House.

## Heritage Assets

### Designated Heritage Assets

- 2.19 The only statutory listed building within the site allocation area is the ‘south of the river’ sculpture outside Becket House (Grade II Listed). It is a large post-war piece which sits on a raised front lawn fronting Lambeth Palace Road. The setting and potential relocation of this designated heritage asset will be a key consideration.
- 2.20 The Lambeth Palace Conservation Area includes the part of the site allocation that lies on the south side and Royal Street and continues Southward to include Archbishop’s Park and Lambeth Palace gardens / complex. Detailed analysis can be found in the Lambeth Palace Conservation Area Character Appraisal, 2017. The former Christ Church School and no. 10 Royal Street are considered to be positive contributors to the conservation area.

Nearby heritage assets are:

- 2.21 Westminster World Heritage Site (WWHS) stands across the River Thames to the West. The Outstanding Universal Value of the WWHS, set out in ‘The Palace of Westminster and Westminster Abbey including St Margaret’s Church World Heritage Site Management Plan, 2007 includes:
- The importance, as a group, of the three buildings - Palace of Westminster, Westminster Abbey and St Margaret’s Church.
  - The Palace as a supreme example of Gothic Revival and the work of Sir Charles Barry and AW Pugin.
  - The surviving buildings of the medieval Palace of Westminster, notably the internationally important Westminster Hall and the Jewel Tower.
  - Westminster as the site of the development of parliamentary ideals since the 13th century and as the pre-eminent symbol of the democratic institution.
  - Westminster Abbey as a major ecclesiastical monument of great antiquity and beauty.
  - Westminster Abbey as the place of coronation and shrine of British monarchs since the 11th century and the place where the nation’s important statesmen, poets and other individuals are commemorated.
  - St Margaret’s Church as the church of the House of Commons.
- 2.22 The UNESCO Website identifies the key UNESCO Criteria for Inscription as:  
Criterion (i) to represent a masterpiece of human creative genius.

Criterion (ii) to 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.

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

- 2.23 Protected silhouette designations within London Plan views place a strict height limit on the site when viewed from Parliament Square (see designated views). The setting of this internationally recognised designated heritage asset will be a key consideration. Especially in views from the area encompassing Great George Street / Parliament Street / the northern side of Parliament Square.
- 2.24 Additionally much the area near the WWHS within Lambeth is within its immediate setting and approaches (see Policy Q19 Lambeth Local Plan). These areas have been mapped by Lambeth to ensure that the visual appreciation of WWHS is preserved in the immediate setting and that the public realm of the approaches is of high quality. This site allocation is not within the immediate setting of the WWHS but is within its wider setting (backdrop) and within the approaches. A separate Heritage Impact Assessment has been prepared to support this design evidence.
- 2.25 The Albert Embankment Conservation Area adjoins to the west and includes the whole of the St Thomas' Hospital campus. Detailed analysis can be found in the Albert Embankment Conservation Area Character Appraisal, 2017. It should be noted that post-war buildings within that campus form Site Allocation 2 'St Thomas' Hospital.
- 2.26 The Southbank Conservation Area stands a little distance to the north. The nearest building is the County Hall South Block on the corner of Westminster Bridge Road and York Road. Detailed analysis can be found in the Southbank Conservation Area Statement, 2007.
- 2.27 The Lower Marsh Conservation Area is a short distance away to the NE and linked to the site by Upper Marsh. Detailed analysis can be found in the Lower Conservation Area Statement, 2007.
- 2.28 The County Hall, Westminster Bridge Road, is a grade II\* listed building with a formal front to the River Thames. That façade is the focus of a London Plan strategic view (see later).
- 2.29 Lambeth Palace is a grade I listed complex of buildings located some distance to the southwest. Lambeth Palace is an exceptionally important group of historic buildings dating from the 11th Century onwards. It has been in the ownership of the See of Canterbury since its establishment and it is the official HQ of the Archbishop of Canterbury. The complex contains several significant buildings which have built up over the centuries; the most recent of which is the Lambeth Palace Library which adjoins the Hospital campus on Lambeth Palace Road. However, the other Lambeth Palace buildings are concentrated some distance to the south at the junction of Lambeth Palace Road and Lambeth Road with the Lambeth Palace garden between them and the Library. Given these distances the setting of this designated heritage asset is not considered particularly sensitive to change in relation to this site allocation site.

- 2.30 Lambeth Palace's garden is on the register of historic landscapes. The beautifully maintained garden is laid to lawn at its Southern end and becomes wilder and more informal to the North. The current configuration dates from the 1980s and provides very effective setting for the Palace's principal block - the Blore building to the south of the garden. Tree planting along much of the perimeter, and high boundaries limit public views in. Within the landscape numerous adjoining properties are visible – Stangate House and Canterbury House can be glimpsed in the winter months, and the rooftop of the Urbanest Building is visible in places.
- 2.31 The Victorian buildings of St Thomas's Hospital are grade II listed and present an impressive frontage to the River Thames. They are separated from this site allocation site by Evelina Children's Hospital and St Thomas' A&E building.

#### Non-Designated Heritage Assets

- 2.32 The following are on the Council's Local heritage List:
1. County Hall South Block, York Road (structure)
  2. Shelter at S end of Archbishops Park (structure)
  3. Archbishops Park (landscape)
  4. North Lambeth Archaeological Priority Area (archaeological)

#### Designated Views

##### Strategic Views

The following London Plan views are relevant to this site:

##### Strategic Views 2A and 2B – Parliament Hill

- 2.33 The LVMF states:

*'95 The summit of Parliament Hill provides panoramic views across a wide span of London. Two Assessment Points are identified at the summit, 2A.1 and 2A.2. They are orientated in different directions, although they share the same position: one looks towards St Paul's Cathedral and the other looks towards the Victoria Tower of the Palace of Westminster. There are also two Protected Vistas between these Assessment Points and the Strategically Important Landmarks.*

*96 The topography of London frames the silhouette of the city. The viewer can see a number of complementary and prominent elements, in particular the tall buildings in the City's financial district and an aggregation of taller buildings at Docklands. The latter feature has particular prominence in this view because of the rise of Shooter's Hill in the background.*

*97 St Paul's Cathedral is set within a miscellany of buildings, in both its foreground and background. The dome and peristyle are visible, but some development in the background diminishes the viewer's ability to recognise and appreciate the landmark, particularly in poor weather conditions. However, the Shard with its distinctive shape and high quality*



*materials provides a strong orientation point to allow the viewer to recognise St Paul within the wider panorama. The Palace of Westminster is positioned behind the Euston Tower and the BT Tower. Only the Central Lobby Lantern and the Victoria Tower are visible. The latter's turrets and finials contrast with the simple housing blocks in the middle ground.'*



Figure 24 - Extract from LVMF showing view from assessment point 2A.2. This site allocation site does not sit behind the Palace of Westminster in this view.

#### Strategic View 2B.1 – Parliament Hill east of the summit

2.34 The LVMF describes the view:

*'105 This Viewing Location is on the east side of Parliament Hill, lower than the summit. Assessment Point 2B.1 is located at a position that provides one of the few publicly available views of all of the principal towers of the Palace of Westminster.'*

*106 The viewer can also see the tall buildings that define the financial and governmental centres of London, although trees in the foreground and middle ground interrupt much of the panorama. A break in the trees to the east allows a discrete view of Canary Wharf.'*

*107 All three towers of the Palace of Westminster are set against the distant hills. The scale and simple outline of existing tall buildings in the view frame the Palace of Westminster and contrast with its more delicate and intricate silhouette of towers.'*



Figure 25 - Extract from LVMF showing view from assessment point 2B.1. This site allocation site does not sit behind the Palace of Westminster in this view.

## Strategic View 17A.2 – Hungerford Bridge Upstream Footbridge

2.35 The LVMF describes the views:

*'288 The river dominates the foreground. In the middle ground the London Eye and Embankment trees form distinctive elements. The visible buildings on Victoria Embankment comprise a broad curve of large, formal elements of consistent height and scale, mostly of Portland stone. They form a strong and harmonious building line.*

*289 The Palace of Westminster, part of the World Heritage Site, terminates the view, along with the listed Millbank Tower. The lower cluster of buildings at Vauxhall is also visible in the background. The towers of Westminster Abbey can just be seen as a backdrop to New Scotland Yard. The pinnacles of the Palace of Westminster are echoed in the gables, turrets and chimneys of adjoining buildings, which together create a distinctive and vibrant skyline. In most of the views from the bridge the complete silhouette of the Palace of Westminster can be seen against sky. Where buildings are glimpsed in the background of the landmark, the viewing experience is diminished. Enjoyment of the view is affected by the time of day and the changing quality of the light.'*



Figure 26 - extract from LVMF showing view from Assessment Point 17A.2. The site allocation sits behind The County Hall and the London Eye in this view.

## Strategic View 18A. – Westminster Bridge: upstream

2.36 The LVMF describes the view as follows:

*'309 The upstream side of Westminster Bridge provides views south towards Lambeth Bridge and beyond to Vauxhall. Three Assessment Points (18A.1, 18A.2 and 18A.3) are located on the upstream side of the bridge, each with a different orientation. A Protected Silhouette of the Palace of Westminster is applied between Assessment Points 18A.1 and 18A.2.*

*310 The river forms the foreground of the views. The wide and relatively clear stretch of the river in this prospect contrasts with many other views from bridges, in which the river is relatively busy and includes many moored boats and barges. Mature trees along both embankments form important middle ground elements. The axial views in this straight portion of the river focus on an unresolved modern part of the city around Vauxhall Station, seen between the strong vertical elements of the listed Millbank Tower and the smaller Westminster Tower, beyond Lambeth Palace.*

*311 The pinnacles and towers of the Palace of Westminster, and those of Westminster Abbey behind, are seen against the skyline and are key elements of the Outstanding Universal Value of the Westminster World Heritage Site. The prominence of the Strategically Important Landmark is enhanced by the setting provided by the diminishing trees of Victoria Tower Gardens to the south. The trees accentuate the sense of perspective, while also shielding the cliff-like Thames House buildings, and visually separating the World Heritage Site from the Millbank Tower. There is an emphatic culmination of this River Prospect at the foot of the bridge, with the impressive Clock Tower of the Palace of Westminster most prominent in the view.*

*312 Looking towards the Lambeth bank from just beyond the front wall of the Palace of Westminster, the Victorian turrets of St Thomas's Hospital are clearly seen against the sky. As in the view from the centre of the bridge, Lambeth Palace can also be seen. The prominence of St George's Wharf, Vauxhall, indicates how important the further development of this area will be to the composition of the view as a whole.'*

- 2.37 From Assessment Point 18A.2 part of the St Thomas Hospital campus occupies the left hand side of the view but the site allocation locations are off camera further to the left. This view has been discounted from assessment for that reason.



Panorama from Assessment Point 18A.3 Westminster Bridge: upstream – at the Westminster bank

Figure 27 - Extract from LVM showing the view from Assessment Point 18.3. The whole of the St Thomas' campus's river frontage is visible in the view. The buildings which occupy this site allocation are behind the Hospital centre and left. Beckett House is visible to the left of the view. See extract view from LVMF below.

#### Strategic View 19A.1 – Lambeth Bridge downstream

- 2.38 This view occupies the Lambeth half (eastern) half of the bridge looking downstream (north). There are two viewing locations 19.A1 in the centre of the bridge and 19.A2 at its eastern end. Both views look towards the Westminster World Heritage Site. The LVMF describes the view as:

*'331 The river dominates the foreground and middle ground of the view, with the Palace of Westminster forming the focus. Other important elements in the view are the mature trees on both sides of the river. The intensity of riverside buildings north*

of Westminster Bridge and east into the City of London, is secondary in this view to the visually 'semi-pastoral' setting of the World Heritage Site. No development crowds in close to the World Heritage Site, with only the towers of Westminster Abbey interacting with it to the left of the view (the roof of the Abbey also being visible through the trees in winter).

332 A group of prominent, similarly sized buildings on the riverfront, which includes Whitehall Court, Embankment Place, Adelphi House and Shell Mex House, can also be seen in this view. These are underscored by Westminster Bridge, while other prominent buildings – including the London Eye, the former County Hall, St Thomas's Hospital are seen on the Lambeth side of the river.'

2.39 In View 19A.1 The St Thomas' Hospital campus occupies the right side of the river and the Royal Street site allocation sits to the right of the campus beyond Lambeth Palace Library.



Panorama from Assessment Point 19A.1 Lambeth Bridge: downstream – at the centre of the bridge

Figure 28 - Extract from LVMF showing View from Assessment Point 19A.1. The site allocation is located on the extreme right of the view.

2.40 In view 19A.2 In view 19A.2 the site allocation is not visible as it is screened by Lambeth Palace. See below.



Panorama from Assessment Point 19A.2 Lambeth Bridge: downstream – close to the Lambeth bank

Figure 29 - Extract from LVMF showing View from Assessment Point 19A.2. the Royal Street site is not visible.



### Strategic View 20A – Victoria Emb. between Westminster and Hungerford Bridges

2.41 This view is directed towards County Hall and is aligned on axis with it. The LVMF states:

*'344 The river dominates the foreground. The view is of a series of buildings, which have visual strength as separate objects, rather than continuity. The principal elements are the former County Hall, the Shell Centre, the London Eye and the two bridges. At various positions, prominent background buildings of varying quality appear, including Guy's Hospital, the Shard and, momentarily, St Paul's Cathedral (see also the Linear View from Westminster Pier).'*

2.42 County Hall occupies the centre of the view with the Shell Centre/ Southbank Place and London Eye to its left and the St Thomas Campus to its right with the Royal Street allocation site beyond.



Panorama from Assessment Point 20A.1 Victoria Embankment: between Westminster and Hungerford Bridges – axial to County Hall

Figure 30 - Extract from LVMF showing View from Assessment Point 20A.1. Beckett House is the dark brown mass clamped to the side of County Hall

### Strategic View 23 – Bridge over the Serpentine to Westminster

2.43 Where it is relevant to this site the LVMF describe the views as:

*'386 The foreground and middle ground comprise the lake and the trees along its perimeter. The landscape, between sky and water, converges to a point at the far end of the lake, where certain elements of the Westminster World Heritage Site are visible. The Victoria and Central Lobby Towers of the Palace of Westminster and the western towers of Westminster Abbey form the distant focus of the view. The Victoria Tower is partially obscured by the Ministry of Justice building (formerly the Home Office). The Clock Tower is entirely obscured....'*

2.44 None of the buildings on the site allocation are visible in this view. They are screened by the Palace of Westminster and other middle ground development.



Figure 31 - Extract from LVMF showing View from Assessment Point 20A.1. The site allocation's existing buildings are not visible.

Strategic View 27B – Parliament Square North Pavement looking east

View 27B Parliament Square: North Pavement

2.45 There are two Assessment Points, 27B.1 and 27B.2. A Protected Silhouette is applied to the Palace of Westminster between those points. The LVMF describes the view:

*'449 This location provides some of the best overall and internationally renowned views of Westminster World Heritage Site. This location allows the appreciation of the grandeur and dominance of the Clock Tower and Victoria Tower, and for all the major buildings of the World Heritage Site, including Westminster Abbey and St Margaret's Church to be sharply delineated against clear sky...*

*451 From this Viewing Location, the full composition of the Houses of Parliament can be understood with the long horizontal mass of the buildings framed by the massive verticality of the Clock Tower and the Victoria Tower. Westminster Abbey provides a catalogue to successive phases of English Gothic Architecture and naturally inspired the work of Barry and Pugin on the Palace of Westminster. The stained glass windows and architectural detailing of St Margaret's Church can also be more fully appreciated in this view.'*

2.46 From Assessment Point 27B.1 Beckett House is glimpsed to the left of the Elizabeth Tower in its backdrop.



Figure 32 - Extract from LVMF showing View from Assessment Point 27B.1. Beckett House can be seen on the left at the base of the Elizabeth Tower.

2.47 From Assessment Point 27B.2 the LVMF view is clipped off along the edge of the Victoria Tower and the St Thomas' Hospital campus is off camera to the left.



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



## Local Views

2.48 The following views are designated within Draft Revised Lambeth Local Plan PolicyQ25 (c):

### Panorama (i) (c) Brockwell Park N and NNE to the city

2.49 The Draft Lambeth Local Views SPD (2020) describes the view as:

*'The character of the view is that of a varied roofscape providing glimpses of recognisable city landmarks in the distance foreground is the landscape of Brockwell Park and the low-rise housing immediately to its north and northeast...*

*...The landmarks of note include – the Vauxhall tall buildings cluster, Victoria Tower, London Eye, Shell Centre, St Paul's Cathedral, and The Shard.'*

2.50 The top storeys of the largest of the buildings within the St Thomas's Hospital campus and Urbanest are currently glimpsed in this view.

### Panorama (ii) Norwood Park to the city

2.51 The Draft Lambeth Local Views SPD describes the view as:

*'The focus of the view is the distant cluster standing on a wide, flat horizon. The drama of the composition is reliant upon the low lying middle ground development within Southwark (East Dulwich, Camberwell, Walworth etc.) which is virtually invisible due to screening by tree canopies...'*

2.52 The top storeys of the largest of the buildings within the St Thomas's Hospital campus and Urbanest are glimpsed in this view.

## Routes, Access, Servicing and Public Realm

2.53 The pedestrian entrance from Lambeth Palace Road into Archbishop's Park has generous public realm to Lambeth Palace Road and attractive and legible gateway into the park. By contrast the pedestrian entrance from Archbishops Park onto Carlisle Lane is somewhat hidden and reflects historic, pre-war ownership lines that make no sense today. That said, it is this entrance which is popular with pedestrians travelling north south between Vauxhall and Waterloo as Archbishop's Park and Carlisle Lane are quiet and safe routes that connect northward to Lower Marsh. By contrast the alternative road route along Lambeth Palace Road is heavily trafficked and becomes more unfriendly to pedestrians as they progress northwards.

2.54 Whilst most of the adjoining railway viaduct is publicly accessible from Carlisle Lane, its northern part adjoining Canterbury House between Carlisle Lane and Lambeth Marsh is currently closed off.

## Trees

- 2.55 The large, mature tree on the front lawn outside Canterbury House is considered to be of high amenity value.
- 2.56 The row of mature trees along the northern boundary of Archbishop's Park are subject to a Tree preservation Order.



Figures 34 and 35 - Summer and winter views of the northern boundary of Archbishop's Park from within the Park. Stangate House and Canterbury House are visible over the low slate roof of the former school. The boundary trees are TPO.

## **Planning and Emerging Context**

- 2.57 Permission was granted on appeal for a 600-home redevelopment of the site designed by Sir Terry Farrell in 2007. That scheme entailed the demolition of all the buildings on the site. This permission has not been implemented and has since lapsed.



Figure 36 – Founders Place scheme as seen from Lambeth Palace Road

- 2.58 Policy PN1 ‘Waterloo and South Bank’ of the Lambeth Local Plan sets out the policy for the site locality. Annex 10 of the Lambeth Local Plan identifies locations appropriate for tall building development. It includes the locations of current Beckett House (Location 7 – Lambeth Palace Road / Upper Marsh – c60m AOD), and current Stangate House / Canterbury House (Location 8 – Royal Street / Upper Marsh – c50m AOD). The land within the site on the south side of Royal Street was discounted as a location for tall buildings because of its location within a conservation area. The wider approach can be found in the [Waterloo Tall Buildings Study, 2018](#) and [Lambeth Topic Paper 8, Tall Buildings, 2020](#).

## **Site Constraints and Opportunities**

- 2.59 The table below outlines the key constraints and opportunities:

### **CONSTRAINTS**

#### **Heritage Assets**

The retention of positive contributor buildings within the Lambeth palace Conservation Area places a constraint on site redevelopment.

The settings of the Westminster World Heritage Site and the Lower Marsh Conservation Area constrains the building heights across much of the site

### **OPPORTUNITIES**

#### **Heritage Assets**

The relocation of the ‘South of the River’ sculpture presents the opportunity for its significance to be sustained and explained.



**Trees**

The root protection zones and canopies of the TPO trees at archbishop park place a constraint on building footprints

**Park Entrance**

The NE park entrance is not legible and the approach footway

**Connectivity**

Not all of the southern side of the railway viaduct is accessible to the public and much of the adjoining land is dominated by vehicle parking

**Public Realm**

The public realm within the site is generally poor quality and is hard standing dominated

**Neighbour Amenity**

Urbanest building to north of Beckett House has student residential occupants.

**Trees**

The site presents opportunities for further tree planting as part of the urban greening strategy.

**Park Entrance**

Redevelopment presents the opportunity to make the NE park entrance more legible and with a more generous footway

**Connectivity**

A new route along the southern side of the railway viaduct presents the opportunity to create a 'low line' route linking Carlisle Lane with Upper Marsh.

**Public Realm**

Comprehensive redevelopment presents the opportunity to significantly improve the quality of the environment and the pedestrian experience.

**Electronic Billboard**

Redevelopment presents the opportunity to remove the billboard on the corner of Lambeth Palace Road and Royal Street.

### 3. Design approach

#### Key Principles

3.1 In seeking to achieve a design-led optimisation of the site, site -specific design drivers have informed the following design principles:

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

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

- i) In relation to the setting of the WWHS this means to preserve or enhance its Outstanding Universal value. The greatest sensitivity comes in strategic view 27B. Here the general building height identified in Annex 10 of the Lambeth Local Plan is considered the optimum and has not been exceeded.
- ii) In relation to the settings of the Southbank, Albert Embankment and Lower Marsh Conservation Areas the tall building site allocation height identified in Annex 10 of the Local Plan has been considered the optimum.
- iii) Retention of the positive contributors within Lambeth Palace Conservation Area - 10 Royal Street and former Christ Church School.
- iv) Within the Lambeth Palace Conservation Area new development is at a scale that preserves the character and appearance of the conservation area.
- v) Retain / relocate 'South of the River' sculpture in an appropriate, publicly accessible outdoor space.

#### **B Respect established street character / alignment**

- (i) Have a positive effect on the character of Lambeth Palace Road, avoiding a canyon effect.
- (ii) Retain Upper Marsh's existing alignment because of its historical importance as an ancient route across Lambeth Marsh and its role in connecting Lambeth Palace Road to Westminster Bridge Road.
- (iii) Retain Royal Street because of its important role for access and servicing.

#### **D Routes are safe and legible**

- (i) Redevelopment on the car park should improve the legibility of the Carlisle Lane entrance into Archbishops Park
- (ii) Provide increased permeability through a new publicly accessible route along the viaduct between Carlisle Lane and Upper Marsh.
- (iii) Building siting which activates all public routes, providing opportunity for good natural surveillance.

#### **E Public Realm / Open Space**

- (i) Retain the pocket park on the corner of Royal Street and Carlisle Lane.
- (ii) The lawn outside Canterbury House and the hard paving around Stangate House / Upper Marsh do not need to be retained in order to ensure site optimisation. Redevelopment presents the opportunity to significantly improve the public realm with a new configuration.

**F Retain Trees of Value**

- (i) The footprint of development within the carpark should respect the root protection zone of the London Plane trees of high value (Category A and TPO 452).
- (ii) The large London Plane on the lawn outside Canterbury House is of high value (category A) should be retained.

**G Neighbour Amenity**

Cause no unacceptable effects on the amenity of neighbours (daylight, sunlight outlook etc.)

## 4. Indicative Approach

### Indicative Approach - Overview

- 4.1 The Indicative Approach layout comprises the retention of the former Christ Church School and no. 10 Royal Street, the replacement of Beckett House, Canterbury House, and Stangate House and the erection of a new buildings on the sites of the temporary mean-while buildings and on the Carlisle Lane car park.

### Indicative Approach - Layout and Access

- 4.2 The existing arrangement of roads is retained in the indicative approach as Carlisle Lane, Royal Street and Upper Marsh are important local routes. In addition, it is proposed to open a new route along the railway viaduct between Carlisle Lane to Upper Marsh. This new addition to the local 'low line' has the potential for future connection on to Westminster Bridge Road.
- 4.3 The replacement building on the site of Canterbury House is re-aligned to ensure the retention of mature trees and to provide a public square for the re-located 'South of the River' sculpture. The undeveloped space on the former Carlisle Lane car park is considered suitable for residential amenity or for other open space uses.



Figure 37 – Indicative Approach – aerial view. The indicative approach for the St Thomas' Hospital site allocation is glimpsed to the left.



### Indicative Approach – Massing and General Building Height

- 4.4 The site of Beckett House is identified as appropriate for a tall building in Annex 10 of the Lambeth Local Plan (2021). The indicative approach height for the Beckett House site is 60m tall (64m AOD) which is considered a tall building in this part of Lambeth. The replacement buildings for Canterbury House and Stangate House are 46m (50m AOD) tall (again these are considered tall buildings) and roughly on the same footprint as the existing buildings. Again, these locations are identified in Annex 10 as appropriate for tall building development and the heights are in accordance with the general heights identified for these locations in Annex 10. On the car park to the immediate north of Canterbury House has a low-rise block of 17m (20m AOD). Height here has been suppressed in response to Strategic View 27B.2.
- 4.5 On the south side of Royal Street No. 10 Royal Street has been retained and extended upwards by one storey to 11m (15m AOD). To its east the temporary buildings (office and barn) have been replaced with buildings at 20 (24m AOD) and 29m (33m AOD) respectively. On the site of the Carlisle Lane car park the Indicative approach massing stands at 36m (40m AOD) which is not considered to be a tall building.
- 4.6 The approach to height steps up from the lowest retained building (former Christ Church School) at the south of the site to the highest building at the north (site of Beckett House). This approach is primarily to ensure development preserves the character and appearance of the Lambeth Palace Conservation Area and the settings other heritage assets; and also, to ensure no stark jumps or contrasts in building heights within the site.

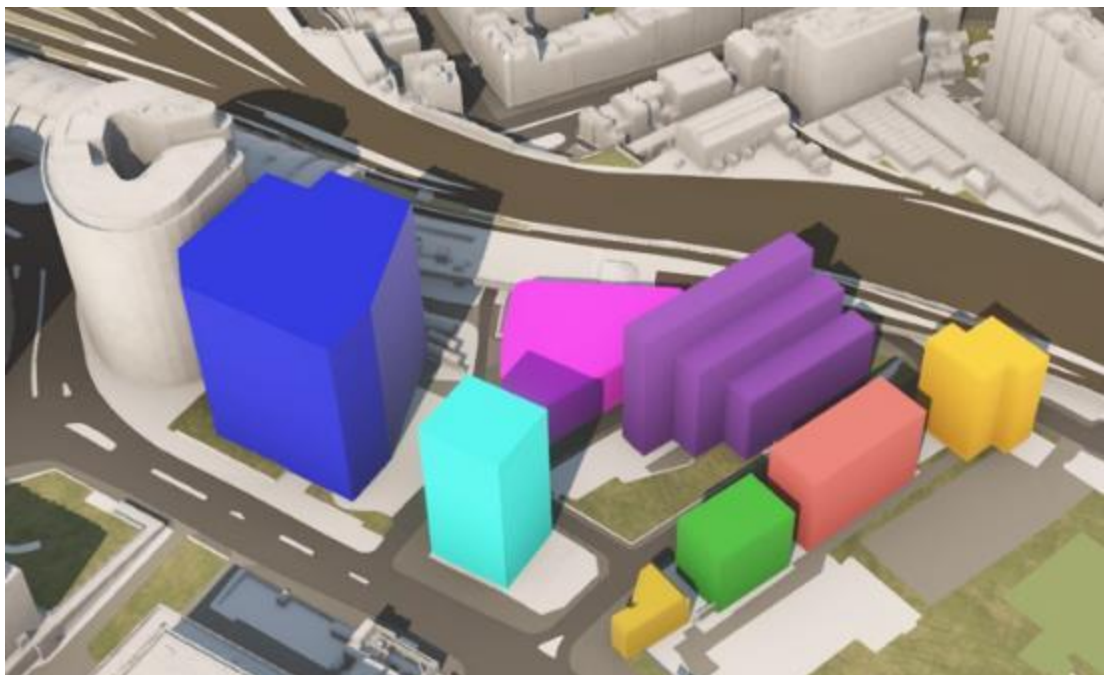


Figure 38 – Indicative Approach - 3D model

#### **Indicative Approach Explained**

<b>Address</b>	<b>Model Colour</b>	<b>Height (relative)</b>	<b>Use</b>
Beckett House site	Dark blue	c60m	Office
Stangate House site	Pale Blue	C46m	Office

Canterbury House site		C46m	Office
Canterbury House Car Park		C17m	Office
10 Royal Street (extended)		c15m	Office
Meanwhile office site		c20m	Residential
Meanwhile barn site		C29m	Residential
Car park site		C36m	Residential

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

#### Indicative Approach – Quanta

4.9

<b>Use</b>	<b>Amount</b>
Residential units	138
Office	64100 sqm GIA
Food/culture	4600 sqm GIA

## 5. Appraisal of the Indicative Approach

- 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. In the case of this site the approved extension to the Evelina Hospital has been included in that way.
- 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 It should be noted that the rich and overlapping nature of heritage designations in the locality means that the same view can be used for a number of different impact assessments. For example, A strategic view designated in London Plan will be assessed against the relevant LVMF guidance but the same view might also be used to assess the effect on the setting of a designated heritage asset. For which the assessment criteria would be different.
- 5.4 The townscape and visual impact assessment has been undertaken with three principal objectives:
- to ensure that the impact on Strategic and Local views is acceptable in relation to view composition and appreciation,
  - 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
  - to ensure no harm to the significance (including setting) of heritage assets.
- 5.5 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.
- 5.6 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.

### **Effect on Designated Views**

- 5.7 A range of views were tested to understand the impact of the Indicative Approach. The detailed analysis on each view is contained in Appendix 1 and the findings are summarised below:

View No	View Name	Guidance and Effect
View 1	Strategic View 2A.2 – Parliament Hill to Palace of Westminster	The Indicative approach is not visible in this view.
View 2	Strategic View 2B.1 – Parliament Hill east of the summit	The Indicative approach is not visible in this view.
View 3	Strategic View 17A.2 – Hungerford Bridge Upstream Footbridge	The Indicative approach is not visible in this view.
View 4	Strategic View 18A.3 – Westminster Bridge: upstream close to Westminster Bank	<p>The LVMF visual management guidance states:</p> <p><i>'319 The opportunity presented by any new development on the south side of the River in front of Lambeth Bridge to improve the quality of the view would need to be assessed against its impact on Lambeth Palace, the Victorian turrets of St Thomas's Hospital as well as on the Outstanding Universal Value of the World Heritage Site.'</i></p> <p>The indicative approach accords with the design guidance in the LVMF.</p>
View 5	Strategic View 19A.1 – Lambeth Bridge downstream	<p>In terms of visual management guidance the LVMF states:</p> <p><i>'335 The setting of the Palace of Westminster is largely unaffected by modern development when seen in views from Lambeth Bridge. The qualities of this setting must remain in order that the Outstanding Universal Value of the World Heritage Site, in townscape and visual terms, can be recognised and appreciated by the viewer.'</i></p> <p>The quality of the wider view is preserved. No harm to the OUV of the WWHS.</p>
View 6	Strategic View 20A.1 – Victoria Emb. Between Westminster and Hungerford Bridges to County Hall	<p>The LVMF visual management guidance states:</p> <p><i>'346 It is recognised that new development, including within the Waterloo Opportunity Area, may become visible in the background of this view. Such development may be acceptable if it</i></p>



*is sensitively designed and does not dominate the horizontal emphasis of the composition provided by landmark riverside buildings, particularly the former County Hall. New development should contribute to the juxtaposition between the vertical elements around the Shell Centre and the horizontal elements of County Hall.'*

The Indicative Approach has a neutral effect on view composition and a potentially beneficial effect on setting of County Hall and Southbank Conservation Area.

View 7 Strategic View 23 – Bridge over the Serpentine to Westminster

The indicative approach is not visible.

Views 8 & 9 Strategic View 27B.1 and 2 – Parliament Square North Pavement looking east

The LVMF visual management guidance states:

*'457 New development glimpsed in the background of views from this part of Parliament Square should be of appropriate height, scale, massing and materials to allow full appreciation of the buildings forming the World Heritage Site. In the gap between the Palace of Westminster and Westminster Abbey, the existing skyline in these views do not define limits on the heights of new structures, any visible new development should be of the highest design quality and should sustain the Outstanding Universal Value of the World Heritage Site and its setting. Development should not detract from the clear separation between the major groups of buildings nor compromise the strong vertical emphases of the towers defining the extremities of the Palace of Westminster nor detract from the appreciation of Westminster Abbey and St Margaret's Church.*

*458 The Protected Silhouette of the Palace of Westminster should not be altered by development appearing in its background, when viewed from any location along the line linking the Assessment Points.'*

There will be no adverse effect on the OUV of the Westminster World Heritage Site.

## Local Views

5.8 The scheme has been tested in the following Local Views:

<b>View No</b>	<b>View Name</b>	<b>Effect</b>
View 19	Panorama 1 (c ) Brockwell Park to the city.	<p>The draft Lambeth Local Views SPD provides the following guidance:</p> <p><i>‘Background (c) Only tall building development is likely to be appreciable in the background. Located in the centre of the city it is likely to enhance the view by adding to the richness of the cityscape. Apart from illustrating the effect of development on the view as a whole applicants should illustrate that their proposals do not block the appreciation of the following landmarks from the locality of the identified view locations below:</i></p> <p><i>Telecom Tower E:531638 N:174089 St Paul’s Cathedral E:531637 N:174088 London Eye E:531636 N:174094 City Cluster v2 E:531692 N:174070 City Cluster v1 E:531590 N:174130 Canary Wharf E:531716 N:174057’</i></p> <p>The upper most parts of the tallest buildings are glimpsed in the view but are seen at low level against existing development. The view composition remains unaltered and none of the view landmarks is obscured.</p>

## Effect on Townscape

5.9 These views were tested to understand the impact of the Indicative Approach on its general urban context. The views are described in Appendix 1 and the assessment findings are summarised below:

<b>View No.</b>	<b>View Name</b>	<b>Effect</b>
10	Westminster Bridge (western end near Boudica) looking east	The massing is comfortable in this townscape context.
11	Lambeth Palace Terrace looking north across	The reality of the tree screening means that only the uppermost parts of the buildings will

	Lambeth Palaces garden.	be glimpsed. As the viewer proceeds north the tree screening will increase. No adverse effect.
12	Archbishop's Park (south side)	Only the uppermost parts of the indicative approach will be visible above the trees when they are in leaf. The variety in heights of the Indicative approach, including retained buildings, avoids an oppressive effect. No harm.
13	Archbishop's Park Centre (centre, western side path)	Only the uppermost parts of the indicative approach will be visible above the trees when they are in leaf. The variety in heights of the Indicative approach, including retained buildings, avoids an oppressive effect. No harm.
14	Archbishop's Park (northern end)	Only the uppermost parts of the indicative approach will be visible above the trees when they are in leaf. The variety in heights of the Indicative approach, including retained buildings, avoids an oppressive effect. No harm.
15	Royal Street / Carlisle Lane junction	The townscape effects are beneficial. Within the Lambeth Palace conservation area a brick palette and sympathetic architecture drawn from the conservation area's character will be an enhancement on existing
16	Lambeth Palace Road at Lambeth Palace Library	The tiering up of heights away from the conservation area is clearly appreciable here. No adverse effect.
17	Lower Marsh at junction with Frazier Street	The overall effect on the townscape is neutral.
18	Lower Marsh at junction with Baylis Road	The overall effect on the townscape is neutral.

### **Effect on Heritage Assets**

5.10 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.

5.11 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).'*

5.12 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:*

- those where the composition within the view was a fundamental aspect of the design or function of the heritage asset.*
- those where town- or village-scape reveals views with unplanned or unintended beauty.*
- 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 '*

5.13 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.'

5.14 Objective results have been achieved by using the table below in Figure 24 to reach conclusions on the Magnitude of Impact. This is achieved by assessing the scale of change against the value of the asset. Appendix 3 of the Mayor of London’s ‘London’s World Heritage Sites – Guidance on Setting SPD (2012) has been used to measure the scale of change.

<b>VALUE</b>	Very High	Neutral	Slight	Moderate/ Large	Large/ Very Large	Very Large
	High	Neutral	Slight	Slight/ Moderate	Moderate Large	Large/ Very Large
	Medium	Neutral	Neutral/ Slight	Slight	Moderate	Moderate/ Large
	Low	Neutral	Neutral/ Slight	Neutral/ Slight	Slight	Slight/ Moderate
	Negligible	Neutral	Neutral	Neutral/ Slight	Neutral/ Slight	Slight
		No Change	Negligible	Minor	Moderate	Major

Figure 39 – Magnitude of Impact can be assessed using the table above

5.15 Upon identification of the Magnitude of Impact a conclusion is then made on whether the outcome on significance of the heritage asset (including setting) is beneficial (an enhancement), has no effect (preserves), or is harmful to the significance of the asset. Consideration is also given the mitigation of the effect.

5.16 The heritage impact conclusions are set out in the below:

Approaches to the Westminster World Heritage Site (WWHS)

Contribution Made by Setting

5.17 The approaches are the environment which visitors to the WWHS pass through on their journey to and from it. Policy Q19 seeks to ensure an uncluttered, high quality and attractive environment. The public realm within the site (Upper Ground, Royal Street, Carlisle Lane in particular) is relatively poor at present and therefore detract from the visitor experience.

Effect of Indicative Approach on Significance

- 5.18 A comprehensive redevelopment along the lines of the Indicative Approach would bring significant public realm improvements. The effect of development would be beneficial on the approaches to the WWHS. See Views 1- 6 and 9.

#### Significance including setting of the Westminster World Heritage Site (WWHS)

- 5.19 No harm. For details see Appendix 1 assessment and the separate Heritage Impact Assessment for the full analysis.

#### Lambeth Palace Conservation Area (LPCA)

##### Contribution Made By Setting

- 5.20 The LPCA is characterised by the historic complex of Lambeth Palace, and associated historical development largely focused around Archbishop's Park and Lambeth Palace's Garden. The wider urban setting is varied. The Palace of Westminster and River Thames contribute importantly to setting. The post war buildings to the north do not.

##### Effect of Indicative Approach

- 5.21 High value asset. Moderate change within the CA and Major change to the setting. Magnitude of Impact is Large / Moderate. The retention and extension of 10 Royal Street will preserve the conservation area. The retention of the former Christ Church School will preserve the special interest to the conservation area. The new building on the car park site is of a height and massing which, whilst visible within the conservation area and especially from within Archbishop's Park will have no detrimental effect.

#### 'South of the River' sculpture

##### Contribution Made by Setting

- 5.22 This grade I listed sculpture was commissioned for its current site at Beckett House but Beckett House has not been identified in the listing as having value to the setting of the piece. The list description states: *'Rosenberg [architect of Beckett House] believed that art was part of the enjoyment of everyday life and that buildings provided the perfect spaces in which to house art and sculpture. He believed that contemporary art and modern architecture were complimentary to each other, stating that "architecture is enriched by art and art has something to gain from its architectural setting" (Rosenberg, 1992).* The Indicative Approach sees the piece is relocated within the Site.

##### Effect of Indicative Approach

- 5.23 High value asset. Major change. Large Magnitude of Impact. Dynamically composed sculptures of this nature benefit from being appreciated 'in the round'. Relocating the piece to another space within the site allows for it to become the focal point of a landscaping scheme and to be appreciated 'in the round' for the first time. A new high-quality context, close to the original location will not harm the significance of this piece. No harm will result.

### Albert Embankment Conservation Area (AECA)

#### Contribution Made by Setting

5.24 The adjoining St Thomas' Hospital campus is within the conservation area along with Westminster Bridge and Lambeth Bridge.

#### Effect of Indicative Approach

5.25 High value asset. Moderate change to setting. Large Magnitude of Impact. In views from across the river and from Westminster bridge and Lambeth bridge the Indicative Approach is visible in the backdrop of the AECA and therefore has an effect on its setting. The effect of the Indicative Approach's massing and height on the setting of the AECA is considered not to harm the setting. Indeed, high quality architecture with sympathetic materials has the potential to have a beneficial effect through the general uplift in architectural and environmental quality. See Views 4, 5, 6, 10 and 15.

### Lambeth Palace Gardens (registered landscape)

#### Contribution Made by Setting

5.26 These are the extensive private gardens of the Palace which have several distinct character areas. Like all landscape, the garden is appreciated as an immersive spatial experience and the layout encourages free movement within the spaces.

#### Effect of Indicative Approach

5.27 High value Asset. Moderate change to setting. Moderate Magnitude of Impact. The contribution made by the wider city backdrop and views out of the garden varies around its perimeter. For example, the views towards the WWHS are very important and are locally protected. Many of the views northwards are now terminated by the recently completed Lambeth Palace Library and, beyond, St Thomas' Hospital campus's post-war buildings some of which have a somewhat distracting effect. The Indicative Approach will be glimpsed through the trees in the distance when views look in a north-eastern direction. However, the effect should not be harmful if recessive architecture using locally distinct materials is employed.

### Archbishop's Park (local list space)

#### Contribution Made by Setting

5.28 This is a very important local amenity and a key contributory space within the LPCA. Like all landscape, the Park is appreciated as an immersive spatial experience and the layout encourages free movement. Views westward are across the Lambeth Palace's gardens and the River Thames allowing glimpse views of the WWHS when trees are not in leaf.

#### Effect of Indicative Approach

5.29 Medium heritage value. Major change to setting. Moderate Magnitude of Impact. Because of the north-south arrangement of the Park views within the space are largely focused in northerly and southerly directions. The massing of the Indicative Approach will be visible through the trees in views north across the Park. The building proposed on the car park site

will be particularly visible from the path running along the eastern side of the Park. Visibility itself should not be considered to result in harm and care has been taken with spacing between buildings and the stepping of heights. The Indicative approach is not unduly distracting nor dominant and thus preserves the setting of this non-designated heritage asset.

#### The County Hall, Westminster Bridge Road

##### Contribution Made By Setting

5.30 The northern part of the site falls within the setting of this landmark riverside building.

##### Effect of Indicative Approach

5.31 High Heritage Value. Minor change to setting. Moderate Magnitude of Impact. The indicative approach appears to the right of County Hall when the viewer is directly opposite and viewing County Hall as a symmetrical composition. The Indicative Approach sits comfortably in this important view and has a neutral effect. See View 7.

#### County Hall South Block (local list)

##### Contribution Made By Setting

5.32 This block is physically near Beckett House at the northern end of the site but separated by a busy road, the Urbanest building and the Park Plaza Hotel

##### Effect of Indicative Approach

5.33 Medium Heritage Value. Negligible change to setting. Neutral Magnitude of Impact. Given the distance and the physical environment of buildings between the site and this non-designated heritage asset the effect will be nil.

#### South Wing at St Thomas' Hospital (Grade II)

##### Contribution Made By Setting

5.34 These Victorian buildings front the River Thames and are separated from the Indicative Approach by the large post-war and modern hospital blocks.

##### Effect of Indicative Approach

5.35 High heritage value. Negligible change to setting. Slight magnitude of Impact. In views from Lambeth bridge and Westminster Bridge the Indicative Approach is visible as part of the wider city context to these listed buildings. The effect on these listed buildings is considered neutral. See views 4, 5 and 6.



### Lower Marsh Conservation Area

#### Contribution Made By Setting

5.36 This conservation area is linear in nature with most views either in a northerly or southerly direction. The intimate nature of the townscape channels the views.

#### Effect of Indicative Approach

5.37 High heritage value. Moderate change to setting. Moderate Magnitude of Impact. Views southwards are terminated by the Indicative Approach. The increase in massing will be noticeable in the setting but care has been taken in relation to height and with any future development using sympathetic materials and a recessive character the general effect on the setting will be neutral.

### Lambeth Palace

#### Contribution Made by Setting

5.38 The gardens of Lambeth Place and the River Thames / Albert Embankment are key aspects of this complex's setting from which it draws significance.

#### Effect of Indicative Approach

5.39 High heritage value. Negligible change to setting. Slight Magnitude of Impact. The Indicative approach is seen from the gardens (separate assessment). Otherwise, there is no visual interrelationship. The effect will be neutral.

### Summary of Effects

5.40 The table below summarises the findings on views, townscape and heritage.

<b>View No.</b>	<b>View Name / Heritage Asset</b>	<b>Effect</b>
View 1	Strategic View 2A.2 – Parliament Hill to Palace of Westminster	No effect.
View 2	Strategic View 2B.1 – Parliament Hill east of the summit	No effect.
View 3	Strategic View 17A.2 - Hungerford Bridge Upstream	No harm to view.
View 4	Strategic View 18.A.3 - Westminster Bridge upstream	No harm to view.
View 5	Strategic View 19.A1 Lambeth Bridge looking downstream towards the Palace of Westminster	No harm to view.
View 6	Strategic View 20A.1 - River Prospect Victoria Embankment between Waterloo and Westminster Bridge Westminster Pier to County Hall	No harm to view.

View 7	Strategic View 23 – Bridge over the Serpentine to Westminster	No effect.
Views 8 & 9	Strategic View 27B.1 and 27B.2 - Palace of Westminster from north side of Parliament Square	27B.1 - No harm to view. 27B.2 – No harm to view.
View 19	Local View - Panorama 1 (c ) Brockwell Park to the city.	No harm to view.
View 10	Westminster Bridge (western end near Boudica statue) looking east	No harm to townscape.
11	Lambeth Palace Terrace looking north across Lambeth Palaces garden.	
12	Archbishop's Park (south side)	
13	Archbishop's Park Centre (centre, western side path)	
14	Archbishop's Park (northern end)	
15	Royal Street / Carlisle Lane junction	
16	Lambeth Palace Road at Lambeth Palace Library	
17	Lower Marsh at junction with Frazier Street	
18	Lower Marsh at junction with Baylis Road	
	Westminster World Heritage Site Approaches	No harm
	Westminster World Heritage Site	No harm to OUV including setting
	Lambeth Palace (grade I)	No harm to significance including setting
	County Hall (grade II*)	No harm to significance including setting
	St Thomas' Hospital (grade II)	No harm to significance including setting
	South of the River (grade II)	No harm to significance including setting
	Lambeth Palace Gardens	No harm to significance including setting
	Albert Embankment CA	No harm to significance including setting
	Lambeth Palace CA	No harm to significance including setting
	Lower Marsh CA	No harm to significance including setting
	County Hall S Block (NDHA)	No harm to significance including setting
	Archbishops Park (NDHA)	No harm to significance including setting

5.41 The effects of the Indicative Approach are considered acceptable.

## 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	<p>Preserve the Outstanding Universal Value of the Westminster World Heritage site by complying with the building heights identified in Annex 10 of Lambeth Local Plan and</p> <ul style="list-style-type: none"><li>• Having a calm and recessive approach to the architecture</li><li>• Using a palette of materials which closely mimics the appearance of Portland stone.</li></ul> <p>Preserve or enhance the character of appearance of the Lambeth Palace Conservation Area by:</p> <ul style="list-style-type: none"><li>• Retaining former School, Carlisle Line</li><li>• Retaining former Institute at no. 10 Royal Street</li><li>• Delivering a high-quality building on the car park site which responds positively to the character of the conservation area</li></ul> <p>Preserve the setting of the Albert Embankment Conservation Area the Southbank Conservation Area and the Westminster World Heritage Site by:</p> <ul style="list-style-type: none"><li>• Having a calm and recessive approach to the architecture</li><li>• Using a palette of materials which closely mimics the appearance of Portland stone.</li></ul> <p>Preserve the setting of the Lower Marsh Conservation Area by:</p> <ul style="list-style-type: none"><li>• Ensuring building heights are not unduly dominant</li><li>• Ensuring an interesting roofline in views south along Lower Marsh</li><li>• Carefully choosing a material palette that complements the character of the conservation area</li></ul>
<b>Height and massing</b>	<p>Integrate the building into its context sensitively by:</p> <ul style="list-style-type: none"><li>• Complying with the heights identified in Annex 10 of the Lambeth Local Plan on the land north of Royal Street.</li><li>• Limiting development to low rise and mid-rise on the part of the site within the Lambeth Palace Conservation Area.</li><li>• The site is appropriate for tall buildings as shown on the vision map.</li><li>• The heights on the vision map are dictated by sensitivity in relation to the settings of the Westminster World Heritage Site and County Hall in views from the west.</li></ul>

- The 60m maximum height ensures development at Beckett House is no higher than its Urbanest neighbour.
- The 31m maximum height seeks to ensure that the 'sky gap' along the edge of the Elizabeth Tower is preserved in Strategic View 27B.
- Development in locations appropriate for a tall building should integrate the buildings into their context sensitively by:
  - Achieving a height not exceeding 60m (64m AOD) on the site of Becket House (Local Plan Annex 10 location W7).
  - Within strategic view 27B, where abutting the protected silhouette of Elizabeth Tower, not exceeding a height of 16m (20m AOD).
  - Achieving a height not exceeding 46m (50m AOD) on the sites of Stangate House and Canterbury House (Local Plan Annex 10 location W8).

**Public realm**

Provide generous, good quality public realm across the site  
 Ensure the route from the NE entrance of Carlisle Lane remains an attractive, safe, and overlooked one for pedestrians including:

- Urban greening
- Pocket parks / informal seating
- Generous footways

Maintain Upper Marsh

Open up a 'low line' route along the railway viaduct

**Enhanced environment**

Improve the public approach and visibility of the NE entrance to Archbishops Park (from Carlisle Lane).

**Activation and natural surveillance.**

Ensure streets and routes have good natural surveillance, are legible and have a good activation at ground level

**Neighbour Relationships**

Ensure no unacceptable impacts on adjoining residential neighbours.

**Trees**

Retain trees of value and allow sufficient space for them to thrive; and optimise opportunities for new tree planting.



## Appendix 1 Townscape and Visual Impact Assessment

### View 1 – Strategic View 2A.2 – Parliament Hill to Palace of Westminster



Parliament Hill forms part of the prominent east west ridge traversing Hampstead Heath. It is an open public area of the Heath consisting of fields, hedgerows, and woodland. There are several outlooks on the hill but some of the best panoramic views are from the summit, towards the City of London, St Paul's Cathedral, and the Victoria Tower of the Palace of Westminster. All three of the towers of the Palace of Westminster can be seen from positions on the east side of the Viewing Place



The Palace of Westminster is positioned behind the Euston Tower and the BT Tower. Only the Central Lobby Lantern and the Victoria Tower are visible. The latter's turrets and finials contrast with the simple housing blocks in the middle ground.



The Indicative approach is not visible in this view.

**View 2 – Strategic View 2B.1 – Parliament Hill east of the summit**



This Viewing Location is on the east side of Parliament Hill, lower than the summit. Assessment Point 2B.1 is located at a position that provides one of the few publicly available views of all the principal towers of the Palace of Westminster



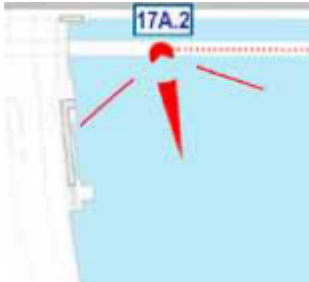
All three towers of the Palace of Westminster are set against the distant hills. The scale and simple outline of existing tall buildings in the view frame the Palace of Westminster and contrast with its more delicate and intricate silhouette of towers.



The Indicative approach is not visible in this view.



**View 3 – Strategic View 17A.2 – Hungerford Bridge Upstream Footbridge**



Located on the upstream side of the bridge representing the wide swathe of views available upstream.



The view is a broad one up the River Thames with the Westminster World heritage Site on the right and Lambeth on the left. The London Eye and County



Hall are particularly visible. The camera here is focused on the south bank but in reality, the view is much wider.



The Indicative approach is not visible in this view.

#### View 4 – Strategic View 18A.3 – Westminster Bridge: upstream close to Westminster Bank



This view is from Westminster Bridge looking towards St Thomas' Hospital campus which is on the extreme left of the view, on the periphery of the viewer's field of vision.

The Hospital blocks are calm and recessive. The mature trees bring welcome greenery. The Urbanest building (black and white bands) can be seen as a recessive, background building.



The river forms the foreground of the view with the Westminster World Heritage Site to the right and Lambeth on the left. The camera is zoomed in towards the site. Whilst the Westminster World Heritage Site is the primary focus of the view, the Indicative Approach is located on the extreme left-hand side of the view and therefore this image is focused on that direction. Here Beckett House can be seen behind Gassiot House at St Thomas' Hospital.



The yellow model on the right of the image is the Evelina Hospital extension approval. The Indicative Approach model for Beckett House is of a similar height to Urbanest and thus introduces a degree of welcome uniformity. Both are largely screened by the Gassiot House replacement block. This arrangement, if in a pale and recessive palette akin to that seen at St Thomas' Hospital would accords with the advice in the LBVMF which states:

*'The opportunity presented by any new development on the south side of the River in front of Lambeth Bridge to improve the quality of the view would need to be assessed against its impact on Lambeth Palace, the Victorian turrets of St Thomas's Hospital as well as on the Outstanding Universal Value of the World Heritage Site.'*

Westminster World Heritage Site  
Lambeth Palace (grade I)  
County Hall (grade II\*)  
Westminster Bridge (grade II)

Behind the viewer, off camera to the extreme right across the River Thames. No effect.

Off camera to the extreme right. No effect.

Off camera to the left on the other side of Westminster Bridge Road.

The River Thames is the principal element of the setting of this Bridge. However, where the bridge makes landfall on both banks the roadway is framed by open space and public buildings. At Westminster these are the Palace of Westminster, Portcullis House and in Lambeth they are St Thomas's Hospital and County Hall. The sensitive increase in development mass on the Hospital campus will not harm this arrangement. The significance of the asset is 'high' the change will be 'minor' therefore the Magnitude of Impact is 'slight'. There will be no adverse effect. Therefore, the setting of the Bridge will be preserved.

Victorian buildings of St Thomas' Hospital  
(South Wing and Block 9)

These assets are seen to the extreme right of the view and separated from the Indicative approach by the significant mass of the North Wing. The YRM campus buildings do not contribute to the setting of these buildings. The significance of the asset is 'high' the change will be 'negligible' therefore the Magnitude of Impact is 'neutral'. There will be no effect. Therefore, the setting of the Victorian buildings will be preserved.

Southbank Conservation Area  
Albert Embankment CA

Off camera to the left on the other side of Westminster Bridge. No impact.

The YRM Hospital campus buildings make a basic positive contribution to the CA collectively because of their calm architecture and unified material palette. The significance of the asset is 'high' the change will be 'minor' therefore the Magnitude of Impact is 'slight'. There will be no adverse effect. Intensification of development within the campus, so long as it is respectful of the architectural character and common palette, will preserve the character and appearance of the CA

Westminster Abbey and Parliament Square  
CA  
LVMF – This is London Plan View 18.A.3

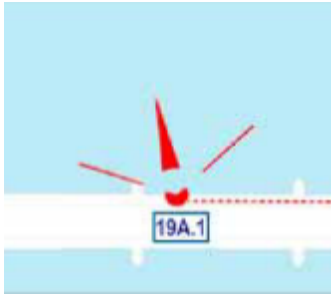
Behind the viewer, off camera to the extreme right across the River Thames. No impact.

The LVMF states:

*'319 The opportunity presented by any new development on the south side of the River in front of Lambeth Bridge to improve the quality of the view would need to be assessed against its impact on Lambeth Palace, the Victorian turrets of St Thomas's Hospital as well as on the Outstanding Universal Value of the World Heritage Site.'*

The assessment above has concluded no adverse impacts on the key heritage assets. Therefore, the Indicative Approach is considered to comply with the LVMF guidance

### View 5 – Strategic View 19A.1 – Lambeth Bridge downstream



This is a broad river prospect with the River Thames forming the dominant central feature. To the left of the view is the Westminster World Heritage Site. To the right of the view the St Thomas' Hospital campus, County Hall and London Eye are clearly appreciable along with Lambeth Palace Library. The pale palette of materials to the left of the image (County hall, Shell Tower and St Thomas' North Wing) reflect the Portland stone character of central London. The red brick hues to the right of the image (Lambeth Palace Library) reflect local character there. The St Thomas' East Block, and Evelina Children's Hospital, with their dark glazing, draw the eye and distract from that pleasing materiality.



This photograph focuses on the Lambeth side of the view. However, the view itself is wider and encompasses the River Thames and the Palace of Westminster on the opposite bank which is the principal focus of the view. The Embankment trees largely screen the Victorian hospital buildings from view although the Block 9 campanile is prominent. Behind it, post-war buildings occupy the view. Beckett House is largely screened by the Evelina Hospital in the view, Stangate House and Canterbury House are glimpsed. None of the site buildings contribute positively to the view.





The trees have been switched off the model for clarity. In reality they will screen the lower parts of the Indicative Approach buildings. The yellow block in the centre of the model is the Evelina Hospital extension approval. The distant yellow blocks left of centre are the recently completed blocks of the Southbank Place development (left two) and Elizabeth House scheme (right block). The dark grey building to right of centre is the Lambeth Palace Library. The indicative approach buildings will be on the extreme periphery of the strategic view and their presence, subordinate to the Evelina extension and further away, is neutral. The quality of the wider view is preserved. No harm to the OUV of the WWHS.

Westminster World Heritage Site

Lambeth Palace (grade I)

On the extreme left of the view and separated from Lambeth by the broad extent of the River Thames. The remaining Victorian buildings of the St Thomas' Hospital campus, with their historic forms and rich silhouette have an architectural dialogue with the WHS. Value of the WHS is 'Very High' the effect on its setting is 'Negligible' and therefore the Magnitude of Impact is 'slight'. No harm to OUV. This asset is off camera to the right; although its modern library building is visible in the view. The St Thomas' Hospital's Victorian buildings make a minor contribution to the setting of the Palace by

County Hall (grade II*)	<p>virtue of their complementary character (towers and pinnacles). The significance of the asset is 'Very High' the effect on the setting is 'negligible'. Therefore the magnitude of impact is 'Slight'. No harm to the setting of Lambeth Palace.</p>
Westminster Bridge (grade II)	<p>County Hall is clearly appreciable in the view. It does not rely on the post-war YRM buildings of the St Thomas's Hospital as contributors to its setting. However, their clare architecture and pale material palette are complementary to it in townscape terms. Significance of the asset is 'High' the scale of change is 'no change' and therefore the Magnitude of Effect is 'Neutral'. The setting of County Hall is preserved.</p>
Victorian buildings of St Thomas' Hospital (South Wing and Block 9)	<p>The St Thomas' Hospital's Victorian buildings make a minor contribution to the setting of the Bridge by virtue of their complementary Victorian character. The significance of the asset is 'High' the effect on the setting is 'Negligible'. Therefore the magnitude of impact is 'Slight'. No harm to the setting of Westminster Bridge.</p>
Southbank Conservation Area	<p>These buildings are the surviving remnants of what was once a spectacular river-side complex. The remaining parts remain impressive in this view in spite of the significant encroachment of modern development in their backdrop. This modern development backdrop does not contribute the setting of these buildings. Significance of the asset is High, the change to setting is 'Minor' making the Magnitude of Effect 'Medium'. There is clearly change in their backdrop but it is discrete and does not diminish our ability to appreciate them. No harm results to the setting.</p>
Albert Embankment CA	<p>County Hall and London Eye are within the Southbank Conservation Area. The River Thames and its built frontage in this view contribute positively to the setting of the Southbank CA in terms of continuity and sense of place. The value of the asset is 'high', the effect is 'Minor'. Therefore the Magnitude of Effect is 'Slight'. The setting of the Southbank CA is preserved.</p>
	<p>The St Thomas' campus forms the largest character area of this CA.</p>

Westminster Abbey and Parliament Square CA

LVMF – This is London Plan View 19.A

The Victorian buildings are strong positive contributors and the YRM blocks are basic positive contributors to the character and appearance of the CA. This is a good view from which to appreciate both aspects of the campus. The value of the asset is 'High' the change to its significance is 'minor' in this view. The magnitude of Impact is 'Slight'. The significance of the CA is preserved.

On the extreme left of the view and separated from Lambeth by the broad extent of the River Thames. The remaining Victorian buildings of the St Thomas' Hospital campus, with their historic forms and rich silhouette have an architectural dialogue with the Palace of Westminster. Value of the CA is 'High' the effect on its setting is 'Negligible' and therefore the Magnitude of Impact is 'Slight'. Setting of the CA is preserved.

The LVMF states:

*'335 The setting of the Palace of Westminster is largely unaffected by modern development when seen in views from Lambeth Bridge. The qualities of this setting must remain in order that the Outstanding Universal Value of the World Heritage Site, in townscape and visual terms, can be recognised and appreciated by the viewer.'*

Given the assessment conclusions above it is considered that the Indicative Approach meets the requirements of the LVMF.

## View 6 – Strategic View 20A.1 Victoria Embankment to County Hall



View is on Axis with the symmetrical façade of the landmark County Hall.

County Hall is viewed in silhouette against clear sky. To the left, the Shell Centre tower and associated Southbank Place development rise higher than County Hall and are framed by the London Eye. To the right Gassiot House is glimpsed and the North Wing of the campus, which is just off camera is taller than the County Hall chimneys. The roof ridge of the County Hall is c39m AOD and its chimney tops at c43m AOD.



The horizontal emphasis and architectural symmetry are appreciable in the view with London Eye and Southbank Place / Shell Centre stepping up to the left. On the right the Urbanest building is roughly aligned with the roof ridge of County Hall and to its right, stepping down is Beckett House which is dark brown and draws the eye as a result.



The LVMF does not provide specific guidance on development to either side of County Hall. Indicative Approach model of Beckett House is of comparable height to the Urbanest building which is just out of sight in the model but visible in the photograph. The effect of height increase on the view is neutral. The effect on the setting of County Hall and the Southbank Conservation Area could be beneficial if the proposed building had a pale palette similar to that of Portland stone rather than the current dark treatment.

County Hall (grade II\*)

The River Thames in the foreground and the rooftop silhouette against clear sky are key aspects of the context that contribute to the setting of County Hall. The development to left and right is of varied character – to the left the tall buildings strongly frame the view but to the right the campus buildings of St Thomas’ Hospital and Beckett House offer a weak counterpart. They do not contribute to the setting of County Hall.

County Hall is of High significance. The scale of change is Minor. The magnitude of effect is ‘Medium’.



Westminster Bridge (grade II)	The effect of Indicative Approach A and B will be beneficial to the setting by regularising the current varied appearance in a uniform form which does not distract from County Hall's primacy. The setting of County Hall will be enhanced. The river Thames plays an important role to the setting of this bridge. The significance of the asset is 'high' the change will be 'minor' therefore the Magnitude of Impact is 'slight'. There will be no adverse effect. Therefore, the setting of the Bridge will be preserved. The sensitive increase in development mass on the Hospital campus will not harm the setting.
Southbank Conservation Area	The County Hall is a major positive contributor building to the Southbank Conservation Area and so too is the River Thames. In this view the St Thomas' Hospital campus makes a neutral contribution to setting. The significance of the asset is High. The scale of change is 'Minor'. The Magnitude of effect is 'Medium'. The effect of Indicative Approach A and B will be beneficial to the setting by regularising the current wear appearance in a form which does not distract from County Hall's primacy. The setting of Southbank CA will be enhanced.
Strategic View 20A.1	The LVMF states:

*'346 It is recognised that new development, including within the Waterloo Opportunity Area, may become visible in the background of this view. Such development may be acceptable if it is sensitively designed and does not dominate the horizontal emphasis of the composition provided by landmark riverside buildings, particularly the former County Hall. New development should contribute to the juxtaposition between the vertical elements around the Shell Centre and the horizontal elements of County Hall.'*

Given the findings above it is considered that the Indicative Approach complies with the LVMF guidance.

### View 7 – Strategic View 23 – Bridge over the Serpentine to Westminster



View location is the centre of the bridge, representing views eastward towards the far end of the lake and the townscape beyond.

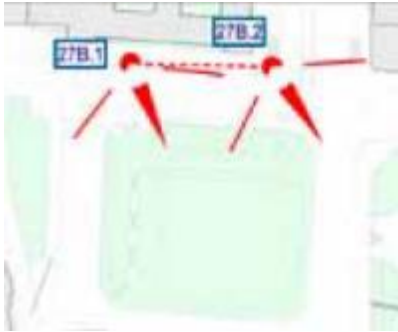


The foreground and middle ground comprise the lake and the trees along its perimeter. The landscape, between sky and water, converges to a point at the far end of the lake, where certain elements of the Westminster World Heritage Site are visible. The Victoria and Central Lobby Towers of the Palace of Westminster and the western towers of Westminster Abbey form the distant focus of the view. The Victoria Tower is partially obscured by the Ministry of Justice building (formerly the Home Office). The Clock Tower is entirely obscured. Buildings are visible in the middle ground. The dense treescape in summer provides a buffer between the urban environment and the park. Buildings such as the Hilton Hotel and Knightsbridge Barracks, rising above the tree line in the middle ground, make the viewer aware of the city beyond.



The indicative approach is not visible.

### View 8 – Strategic View 27B.1 – Parliament Square North Pavement looking east



The view is of the whole Palace of Westminster and Westminster Abbey. The Elizabeth Tower is in the extreme left of this composition and to its left, along Westminster Bridge, development in Lambeth is visible – Park Plaza Hotel (dark glass), Urbanest building (horizontal stripes) and Gassiot House can be glimpsed.

Lambeth Local Plan (2021) Annex 10 identifies Beckett House as a suitable location for tall building development. The general height in the policy accords with the height of Urbanest Building (red line). See Waterloo Building height Study (2018) and Lambeth Topic Paper 8, 2019 for further narrative. The objective is a unified and neutral backdrop to the WWHS.



There is a protected silhouette in place for the Palace of Westminster. However, the silhouette does not extend to the left of the Elizabeth Tower. In the view to the left of the tower Westminster Bridge leads the eye across to Lambeth. Here the Park Plaza Hotel and Urbanest buildings terminate the view across the Bridge. The lower brown building to their right is Beckett House.



The indicative approach for St Thomas' Hospital is included for cumulative effect; the green block is Block A (Gassiot House) from that allocation. The Indicative Approach model of Beckett House is slightly lower than the height of the Urbanest Building which sets the 'no harm' height limit for development in this view.

#### Westminster World Heritage Site

Due to its piecemeal character and varied heights and contrasting palette (dark forms and light forms) the post-war / modern development within Lambeth does not positively contribute to the setting of the WWHS in this view. However, Given the prominence and dominance of the Elizabeth Tower the Lambeth development is not unduly dominant nor distracting and in that regard its overall contribution to setting is neutral.

The significance of the WWHS is 'very high' the scale of change is 'minor' making the Magnitude of effect 'Medium'. The Indicative approach layers the Lambeth townscape and the screening of Beckett House and part of Urbanest is beneficial to the setting.



Palace of Westminster and Parliament Square Conservation Area

Due to its piecemeal character and varied heights and contrasting palette (dark forms and light forms) the post-war / modern development within Lambeth does not positively contribute to the setting of the CA in this view. However, Given the prominence and dominance of the Elizabeth Tower the Lambeth development is not unduly dominant nor distracting and in that regard its overall contribution to setting is neutral.

The significance of the CA is 'high', the scale of change is 'minor' making the magnitude of effect 'Medium'. The Indicative approach layers the Lambeth townscape and the screening of Beckett House and part of Urbanest is beneficial to the setting.

Whitehall Conservation Area

Due to its piecemeal character and varied heights and contrasting palette (dark forms and light forms) the post-war / modern development within Lambeth does not positively contribute to the setting of the CA in this view. However, Given the prominence and dominance of the Elizabeth Tower the Lambeth development is not unduly dominant nor distracting and in that regard its overall contribution to setting is neutral.

The significance of the CA is 'high', the scale of change is 'minor' making the magnitude of effect 'Medium'. The Indicative approach layers the Lambeth townscape and the screening of Beckett House and part of Urbanest is beneficial to the setting.

Strategic View - View 27B.1

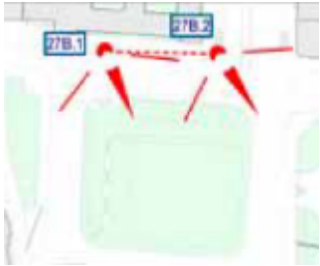
LVMF States:

*'Background 457 New development glimpsed in the background of views from this part of Parliament Square should be of appropriate height, scale, massing and materials to allow full appreciation of the buildings forming the World Heritage Site. In the gap between the Palace of Westminster and Westminster Abbey, the existing skyline in these views do not define limits on the heights of new structures, any visible new development should be of the highest design quality and should sustain the Outstanding Universal Value of the World Heritage Site and its setting. Development should not detract from the clear separation between the major groups of buildings nor compromise the strong vertical emphases of the towers defining the extremities of the Palace of Westminster nor detract from the appreciation of Westminster Abbey and St Margaret's Church.*

*458 The Protected Silhouette of the Palace of Westminster should not be altered by development appearing in its background, when viewed from any location along the line linking the Assessment Points.'*

The Indicative approach meets the guidance in the LVMF by allowing a full appreciation of the Elizabeth Tower.

### View 9 – Strategic View 27B.2 – Parliament Square North Pavement looking east



The view is of the whole Palace of Westminster and Westminster Abbey. The Elizabeth Tower is in the extreme left of this. The strategic view is cropped down the side of the Elizabeth tower so no Lambeth development is visible in the strategic view. However, in reality development in Lambeth is visible – Park Plaza Hotel (dark glass), Urbanest building (horizontal stripes) and Gassiot House can be glimpsed.

The North Wing of St Thomas’ Hospital can be seen visually attached at the base of the Elizabeth Tower.



There is a protected silhouette in place for the Palace of Westminster. However, the silhouette does not extend to the left of the Elizabeth Tower. In the view to the left of the tower Westminster Bridge leads the eye across to Lambeth. Here the Park Plaza Hotel and Urbanest buildings terminate the view across the Bridge. The lower brown building to their right is Beckett House.



Only The Indicative approach massing replacing Beckett House (blue) is now visible. This is a change from the Regulation 18 Approach. The Green massing is the Gassiot House replacement on the St Thomas' Hospital site allocation.

Westminster World Heritage Site

The retention of the sky gap means that the silhouette of the Elizabeth Tower remains unaltered.

The significance of the WWHS is 'very high' the scale of change is 'minor' making the Magnitude of effect 'Medium'. The Indicative approach layers the Lambeth townscape and the partial screening of Beckett House and part of Urbanest is beneficial to the setting. The retained sky gap causes no harm to setting.

Palace of Westminster and

Due to its piecemeal character and varied heights and contrasting palette (dark forms and light forms) the post-war /

Parliament Square  
Conservation Area

modern development within Lambeth does not positively contribute to the setting of the CA in this view. However, Given the prominence and dominance of the Elizabeth Tower the Lambeth development is not unduly dominant nor distracting and in that regard its overall contribution to setting is neutral.

The significance of the CA is 'high', the effect on setting is 'minor' making the magnitude of effect 'Moderate'. The Indicative approach layers the Lambeth townscape and the screening of Beckett House and part of Urbanest is beneficial to the setting.

Whitehall Conservation Area

Due to its piecemeal character and varied heights and contrasting palette (dark forms and light forms) the post-war / modern development within Lambeth does not positively contribute to the setting of the CA in this view. However, Given the prominence and dominance of the Elizabeth Tower the Lambeth development is not unduly dominant nor distracting and in that regard its overall contribution to setting is neutral.

The significance of the CA is 'high', the effect on setting is 'minor' making the magnitude of effect 'Moderate'. The Indicative approach layers the Lambeth townscape and the screening of Beckett House and part of Urbanest is beneficial to the setting.

Strategic View - View 27B.2

LVMF Guidance States:

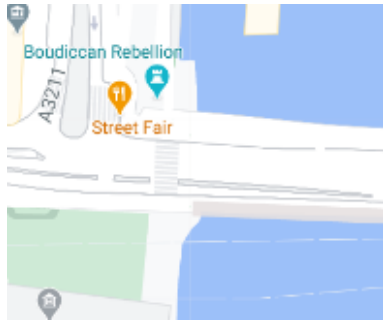
*'Background*

*457 New development glimpsed in the background of views from this part of Parliament Square should be of appropriate height, scale, massing and materials to allow full appreciation of the buildings forming the World Heritage Site. In the gap between the Palace of Westminster and Westminster Abbey, the existing skyline in these views do not define limits on the heights of new structures, any visible new development should be of the highest design quality and should sustain the Outstanding Universal Value of the World Heritage Site and its setting. Development should not detract from the clear separation between the major groups of buildings nor compromise the strong vertical emphases of the towers defining the extremities of the Palace of Westminster nor detract from the appreciation of Westminster Abbey and St Margaret's Church.*

*458 The Protected Silhouette of the Palace of Westminster should not be altered by development appearing in its background, when viewed from any location along the line linking the Assessment Points.'*

The Indicative approach meets the guidance in the LVMF by allowing a full appreciation of the Elizabeth Tower.

**View 10 – Westminster Bridge (western end near Boudica statue) looking east**

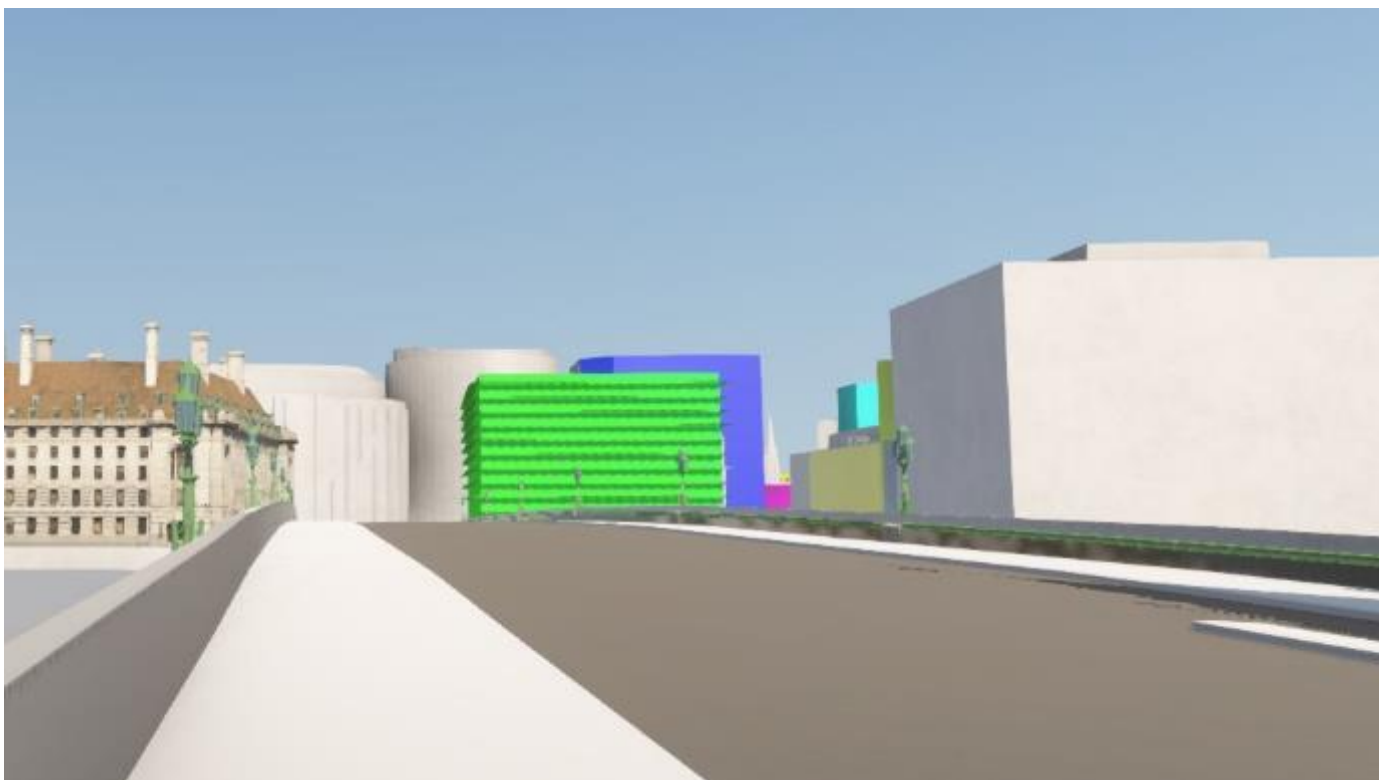


This view location is on the western side of Westminster Bridge, within Westminster’s Palace of Westminster and Parliament Square Conservation Area.

County Hall (grade II\* listed), Park Plaza Hotel (dark glass), and Westminster Bridge are in the Southbank CA. The Hospital campus on the right is within the Albert Embankment CA. Beyond the Urbanest (horizontal bands) and Beckett House (brown stone) are not in conservation areas.







Annex 10 of the Lambeth Local Plan identifies Beckett House (dark blue) as a location appropriate for a tall building and identifies a general height which would be comparable with the Urbanest building to its left. The light blue building to the right is the replacement for Stangate House. SA 1's Indicative Approach Block A (green) stands in front of these buildings and appears lower. Indicative Approach Block B is off to the right and largely concealed by St Thomas' North Wing. The massing of both Blocks is comfortable in this townscape context.

County Hall (grade II\*)

Located to the left of the view, County Hall's setting derives limited benefit from the St Thomas' Hospital beyond the spaciousness of St Thomas's Garden and the pale and recessive character of the YRM buildings. Significance of the asset is High the scale of change is 'Moderate'. Therefore, the Magnitude of Effect is 'Medium'. The townscape effect in relation to County Hall will clearly change but the effect will be neutral in terms of its significance / setting. The setting will not be diminished.

Westminster Bridge (grade II)

The bridge deck occupies the foreground of the view and its ornate lanterns can be clearly appreciated. Its setting does not rely on St Thomas's Hospital's YRM buildings for its significance. However, their calm appearance makes

them neutral in its backdrop. Significance of the asset is 'high'. Scale of change is 'negligible'. Magnitude of effect is 'slight'. No harm to the setting.

Southbank Conservation Area

Located to the left of the view, Southbank CA derives limited benefit from the St Thomas' Hospital beyond the spaciousness of St Thomas's Garden and the pale and recessive character of the YRM buildings which complement County Hall. However, Gassiot House currently has a weak massing when compared County Hall and there is an imbalance in the townscape as a result. Significance of the asset is 'high'. Scale of change is 'moderate'. Magnitude of effect is 'Medium'. There is change to the setting but it could reasonably be argued that an increased mass on the site of Gassiot House would be beneficial in townscape enclosure terms and thus offer an enhancement to the setting of the CA.

Albert Embankment CA

The St Thomas' Campus is a key component of the CA. The value of the asset is 'High' the change to its significance is 'minor' in this view. The magnitude of Impact is 'Slight'. The significance of the CA is preserved.

## View 11 – Lambeth Palace Terrace looking north across Lambeth Palace Garden



The garden of Lambeth Palace is a Registered Landscape and a key contributory space within the Lambeth Palace Conservation Area. The view location is on the terrace that runs parallel to the Palace on its north side.



In the centre of this view is the Lambeth Palace Library. Just visible to its left is the existing Evelina Hospital's existing dark glass roof. The top floors of Urbanest building are to the immediate right of the Library tower. This view from the lawn just to the south of the main garden terrace walk. The viewer has their back to the Palace's main Blore Building. The Lambeth Palace CA Character Appraisal identifies the large glass roof of the Evelina Hospital has having a negative effect on the setting of the garden. That adverse effect has been largely addressed by the erection of the Lambeth Palace Library which now plays an important screening role.



For the purpose of clarity all of the trees have been removed from the model. The large building on the left is the approved extension for the Evelina Hospital. The dark grey building is Lambeth Palace Library and the yellow building behind on its left the existing Evelina Hospital. The small white drum is a folly within the garden.

In this view the Lambeth Palace Library largely blocks the Beckett House and Stangate House replacements from view, but their edge can be glimpsed and should the viewer move, they will appear to the right of the Library. As intended the stepping up of the Indicative Approach massing from south to north is appreciable here. The reality of the tree screening means that only the upper most parts of the buildings will be glimpsed. As the viewer proceeds north the tree screening will increase. No adverse effect.



**View 12 – Archbishop’s Park (south side)**

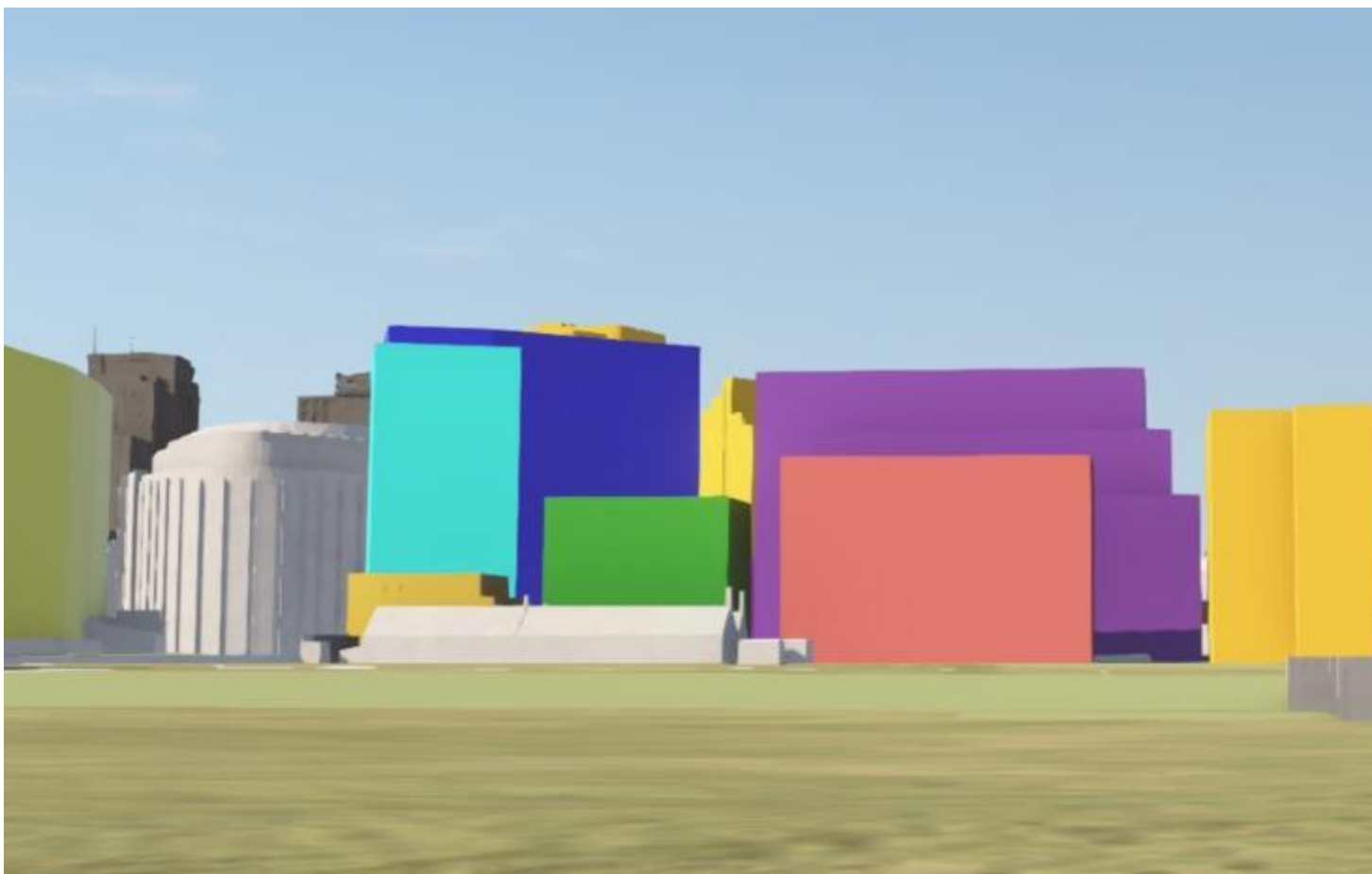


The viewer is at the southern end of Archbishop’s Park, having entered from Lambeth Road, and is looking northwards.



Archbishops Park is an important local open space, designated on the Council’s Local List and a key contributory space to the Lambeth Palace Conservation Area. The two visible structures in the view are the Urbanest building (white stripes) and the uppermost part of the current Beckett House (brown).





For the purposes of assessment, the trees have been switched off in the Vu-City model. In this instance it gives an artificial impression of the effect of the foreground landscape. The dense planting within the Park will provide significant screening when trees are in leaf. The c60m height of the dark blue model (site of Beckett House) is of comparable to the Urbanest building which can be glimpsed in the photograph. This gives some indication of the effect of tree screening. In reality, only the upper most parts of the Indicative Approach will be glimpsed above the treetops when the trees are in leaf. The variety of heights of the Indicative Approach and the retained buildings, avoids an oppressive effect. No harm.

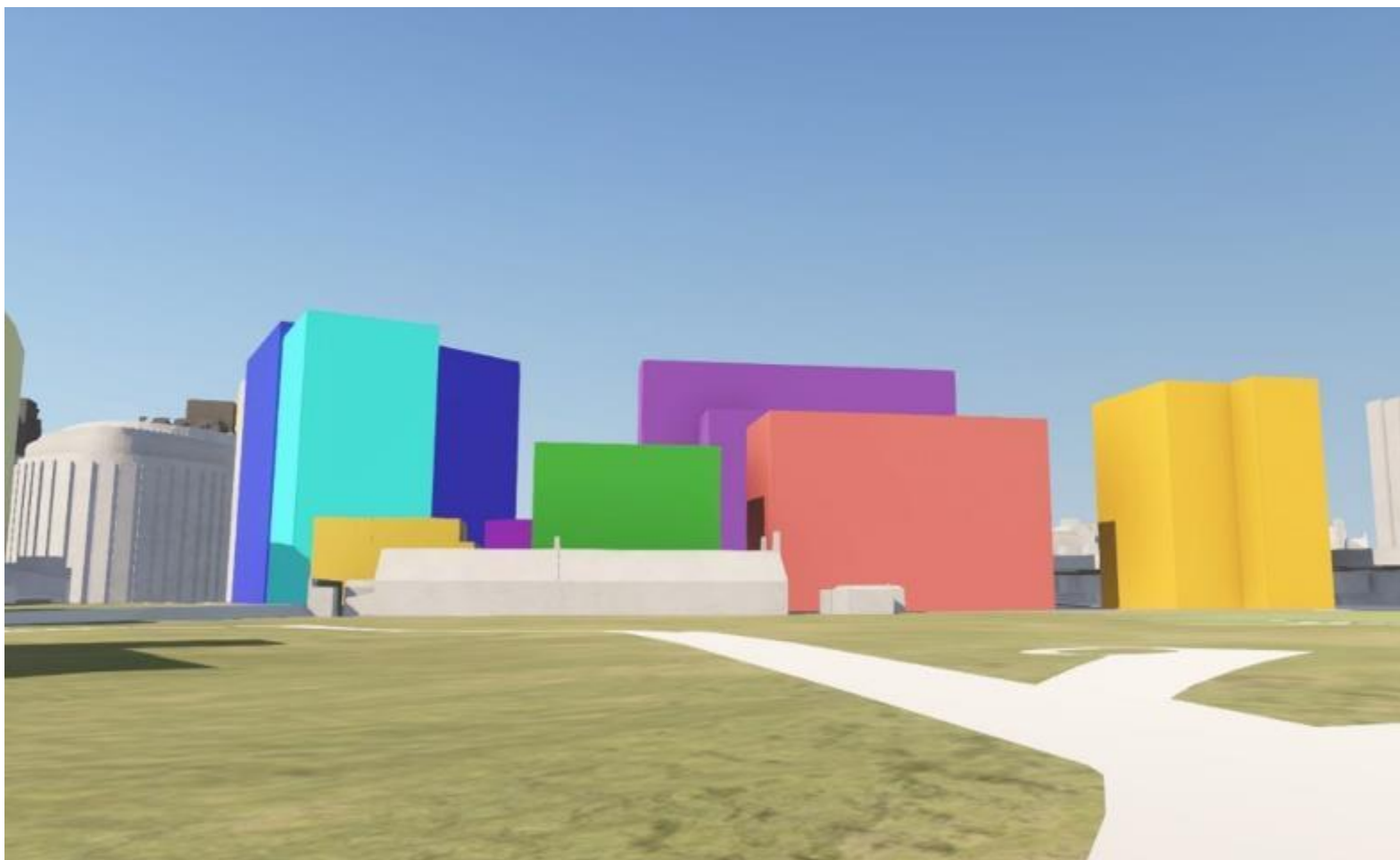
**View 13 – Archbishop’s Park Centre (centre, western side path)**



The viewer is on the western side of Archbishop’s Park looking north looking northwards.



Archbishops Park is an important local open space, designated on the Council’s Local List and a key contributory space to the Lambeth Palace Conservation Area. This location is where the oval path forks off left towards Lambeth Palace Road. Centre of the image, through the trees, the roof of the former Christ Church School can be glimpsed.



For the purposes of assessment, the trees have been switched off in the Vu-City model. Additionally, the high fence that encloses Lambeth Palace's Garden is not within the VU City model. Its presence on the left of the path restricts much of the view on the left. In the foreground the retained former school is the linear, pale grey block. Behind it, in yellow, is the retained 10 Royal Street with an additional storey. Stepping from its left are mid-rise blocks on the south side of Royal Street. Beyond these, on the other side of Royal Street are the largest blocks in the allocation. Thus, the buildings step upwards away from the Park. In reality, only the upper most parts of the Indicative Approach will be glimpsed above the treetops when the trees are in leaf. The variety of heights of the Indicative Approach and the retained buildings, avoids an oppressive effect. No harm.



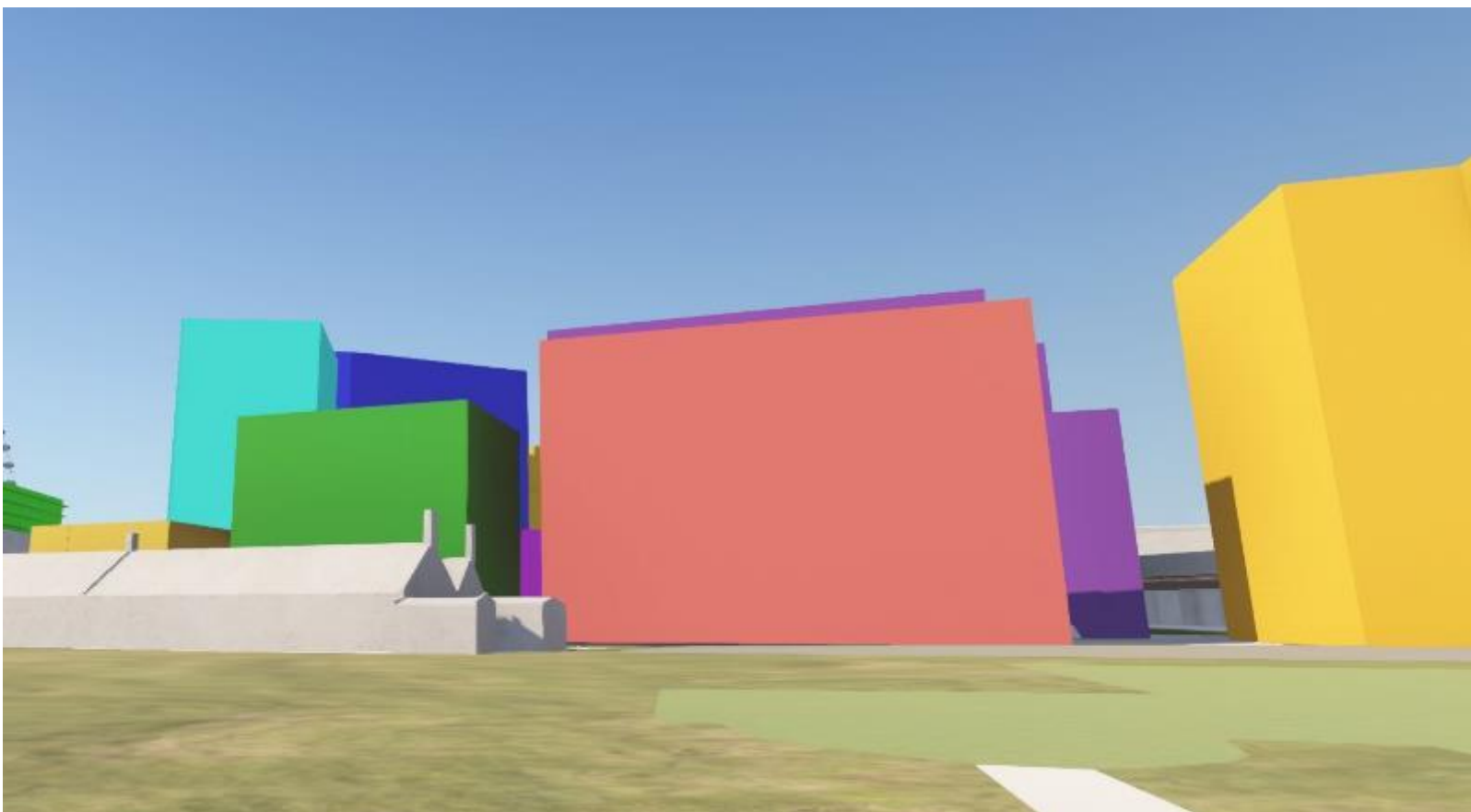
**View 14 – Archbishop’s Park (northern end)**



The viewer is at the northern end of the Park at the table tennis tables looking north



This is a winter view shot showing bare trees. Through the trees the low, slate roof of the former Christ Church School can be glimpsed on the left. Behind are Stangate House, Beckett House and Canterbury House. It should be remembered that, when the trees are in leaf, they provide a substantial screen.



The roof of the former school is the grey foreground model on the left. The purple block, on the north side of Royal Street, is on the site of Canterbury House. The yellow block to the left is no. 10 Royal Street which has been extended upwards. Gaps between the buildings create distant glimpses. Behind the heights step away to the highest building. Similarly, the height differences between the block allow an appreciation of the heights stepping away towards the north.

In reality, only the upper most parts of the Indicative Approach will be glimpsed above the treetops when the trees are in leaf. The variety of heights of the Indicative Approach and the retained buildings, avoids an oppressive effect. No harm.



**View 15 – Royal Street / Carlisle Lane junction**



This view location is on the northern boundary of the Lambeth Palace Conservation Area looking West.



The existing townscape quality is poor. The absence of enclosure and activation on the south (left) side of Royal Street and the poor-quality boundary treatments generally adds to the sense that this a dead back street.



The Indicative approach brings the building line on the northern (right) side closer to the street and new buildings lining the south (left) side of the street. This improves the sense of enclosure and will significantly help with animation and natural surveillance. In the middle ground an open space is created. This is where the mature tree is retained and the 'South of the River' sculpture could be erected here. The townscape effects are beneficial. The St Thomas's Hospital Site allocation Block B (Lambeth Wing) is shown in the distance for cumulative effect. On the left visible buildings of the Indicative Approach which stand within the conservation area, using a brick palette and sympathetic architecture drawn from the conservation area's character will be an enhancement on the existing here.

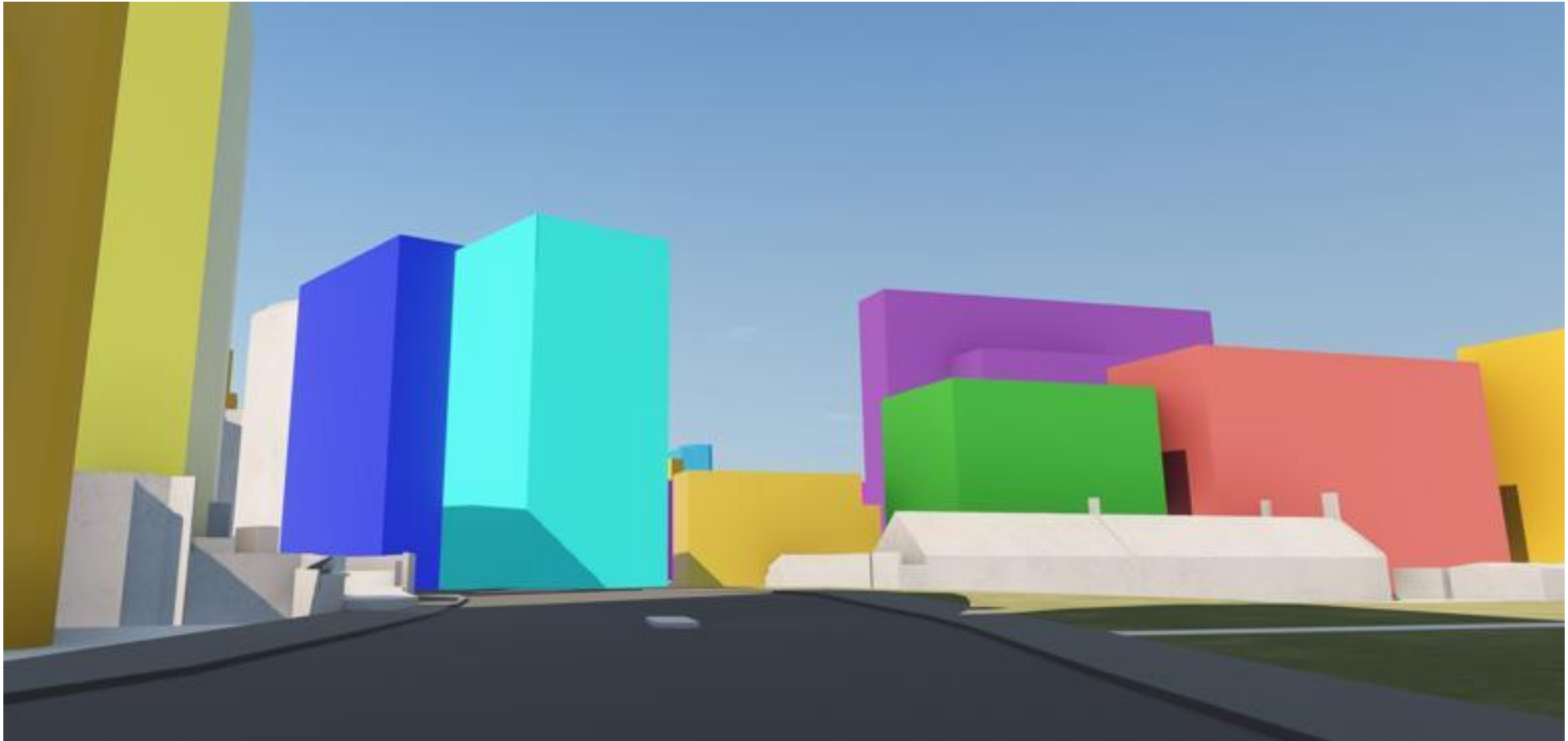
### View 16 – Lambeth Palace Road at Lambeth Palace Library



The view location is within the Lambeth Palace Conservation Area on its boundary with the Albert Embankment Conservation Area (on left). The viewer is looking north.



The viewer is looking north beyond the conservation area which is characterised by the post-war buildings on the site and its modern neighbours. The Park Plaza Hotel and Urbanest buildings can be seen on the left of the view and the former Christ Church School is largely screened from view with foreground fencing and trees. The current townscape setting of the conservation area contributes nothing to its significance.



The tiering of heights up away from the conservation area is clearly appreciable here. The three models immediately behind the former Christ Church School do not unduly dominate it and their stepping from west to east helps integrate the retained no. 10 Royal Street (gold model) which has been extended by one storey.

With pale, recessive architecture for the larger of the buildings the effect on the landscape and setting of the locally designated landscape and the setting of conservation area will be positive. The three visible buildings of the Indicative Approach which stand within the conservation area, using a brick palette drawn from the conservation area character of the conservation area will enhance its character and appearance.



**View 17 - Lower Marsh at junction with Frazier Street**



Within the Lower Marsh Conservation Area



This is a view south down the main part of the Lower Marsh Conservation Area. The intimate, historic townscape has a very strong sense of enclosure. The existing Canterbury House can be glimpsed as a low, horizontal form at the very end of the street. The corner of the existing Beckett House is visible to right of centre.





The yellow building in the foreground is the approved scheme for the Lower Marsh Library site. The Indicative Approach model for Beckett House (dark blue) reinforces the sense of enclosure to right side of Lower Marsh and the yellow model on the site on Canterbury House frames to the left side. The gap between these buildings and the view through avoids a slab-like effect. The overall townscape effect is neutral.

**View 18 - Lower Marsh at junction with Baylis Road**



Within the Lower Marsh Conservation Area



The intimate, historic townscape has a very strong sense of enclosure. The existing Stangate House can be glimpsed against the sky at end of the street. The existing Beckett House to its right.



The height of the Beckett House replacement accords with the heights identified in Annex 10 of the Local Plan. The three Indicative approach models visible are clearly discernible as individual, distant buildings which step away into the distance. The effect on the townscape is neutral.

### View 19 – Local Plan Panorama View Brockwell Park to the City



The draft Lambeth Local Views SPD (2021) states: *The character of the view is that of a varied roofscape providing glimpses of recognisable city landmarks in the distance foreground is the landscape of Brockwell Park and the low-rise housing immediately to its north and north east. The two tall buildings (Herne Hill House and Park View House) restrict the view and as a result frame its eastward extent. These are negative elements within the view along with the adjoining Meath House slab block. The landmarks of note include – the Vauxhall tall buildings cluster, Victoria Tower, London Eye, Shell Centre, St Paul’s Cathedral, and The Shard.*



In this view the Shell Tower is centre right and the London Eye is centre left. It is here that the site allocation approach is located.



The rooftops of the indicative approach are just glimpsed in this view. The indicative approach does not harm the view composition or significance.



## 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

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

END OF DOCUMENT