

# Lambeth Site Allocations DPD – Proposed Submission Version

## Design Evidence

### SA2 - St Thomas' Hospital SE1



September 2023

## Contents

Part	Content	Page
<b>1.0</b>	<b>Introduction</b>	2
<b>2.0</b>	<b>Site Appraisal / Analysis</b>	4
2.1	Site Overview	4
2.2	Site and Context Photographs	5
2.3	Site Character and Brief History	7
2.9	Historical Map	14
2.10	Site Context	14
2.15	Heritage Assets	15
2.32	Designated Views	18
2.52	Routes, Access, Servicing and Public Realm	24
2.56	Green Infrastructure	24
2.60	Planning and Emerging Context	25
2.66	Site Constraints and Opportunities	26
<b>3.0</b>	<b>Design Approach</b>	
3.1	Key Principles	28
<b>4.0</b>	<b>Indicative Approach</b>	
4.1	Indicative Approach – Overview	29
4.2	Indicative Approach – Layout and Access	29
4.4	Indicative Approach – Massing and General Height	30
4.9	Indicative Approach – Daylight and Sunlight	32
<b>5.0</b>	<b>Appraisal of Indicative Approach</b>	
5.1	Effect on Views	33
5.7	Effect on Townscape	37
5.8	Effect on Heritage Assets	37
<b>6.0</b>	<b>Conclusion</b>	46
<b>Appendix 1</b>	<b>Townscape and Visual Impact Assessment</b>	48

## **1. Introduction**

### SADPD Objectives

- 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 to be developed which is set out in Part 4. The indicative approach has been tested to ensure it meets the key design principles and this testing is explained in Part 5. Part 6 concludes the evidence with the identification of key design considerations to be included within the SADPD Policy itself.
- 1.3 The indicative approach included in this evidence is one way to achieve design-led optimisation of the site, assuming it is comprehensively redeveloped. The indicative approach is for testing purposes only and does not have the status of planning policy or guidance. It is not intended to be prescriptive. Applicants and their architects are expected to develop their own approaches to optimisation of capacity within the context of the parameters, constraints and opportunities set out in the site allocation policy.
- 1.4 The indicative approach massing, in combination with land use analysis, has informed the approximate land use quantum included within the draft site allocation policy. As the indicative approach does not include detailed floor plan designs, a number of standard assumptions have been used to approximate the potential number of residential units, including London Plan space internal standards, London Plan and Local Plan external amenity space standards, Local Plan requirements for dual aspect residential units, Local Plan policy for dwelling size mix, and best practice separation distances for that context. For this reason, the indicative quantum included in the draft allocation are approximate and should not be read as absolute minima or maxima. Applicants and their architects may be able to demonstrate a different figure based on alternative design solutions to the site. Detailed planning assessment of design proposals at pre-application and planning application stage may also result in a variation on the indicative figures included in the draft site allocation policy.
- 1.5 Building height definitions can be found in Local Plan Policy Q26. As storey heights vary according to the building use, they are not an accurate means to gauge height. For that reason, building heights are expressed in metres rather than storeys. Generally relative building height is used within the document. Above Ordinance Datum (AOD) height is used to aid understanding of site and context and is generally presented along with the relative building height.

### Changes Since Regulation 18 Consultation

- 1.6 The following changes have been made following the Regulation 18 Consultation:
  - Site boundary extended west to better facilitate development within the hospital estate.
  - Building heights and massings amended to address impact on World Heritage Site.

- Policy wording updated to require development to be set back from the roadside to address stakeholders concerns re cumulative impact of development.
- 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 / Analysis

### Site Overview

2.1 Details of the site are outlined below:

#### Site Address

St Thomas' Hospital, Westminster Bridge Road, SE1



Figure 1 – Site Allocation boundary

## **Site and Context Photographs**

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



Figure 2 - Gassiot House fronting Westminster Bridge Road



Figure 3 – Gassiot House in relation to the approaches and immediate setting of the Westminster World Heritage Site. The viewer is within the Albert Embankment Conservation Area. County Hall (right) is within the Southbank Conservation Area.



Figure 4 - A&E building and Lambeth Wing as viewed from Lambeth Palace Road. The viewer is within the Lambeth Palace Conservation Area.



Figure 5 - A&E building viewed in context with East Wing (to rear) and Evelina Hospital (to left). The viewer is within the Lambeth Palace Conservation Area.

### **Site Character and Brief History**

- 2.3 St Thomas's Hospital has occupied this site since the 1870s when the river frontage was transformed by the creation of the Albert Embankment. The Hospital campus occupies most of the river frontage of Albert Embankment between Westminster Bridge (north of the campus) and Lambeth Bridge (south of the campus). It is enclosed by Westminster Bridge Road to the north and by Lambeth Palace Road to the east. To the south of the campus are buildings occupied by King's College – Prideaux Building (currently being redeveloped) and Block 9). The entire hospital campus sits within the Albert Embankment Conservation Area.
- 2.4 The principal architectural frontage of the Hospital campus is that presented to the River Thames. It is immediately opposite and occupying a similarly sized frontage is the Palace of Westminster (see later). The 19<sup>th</sup> Century Hospital buildings, where they survive, are in red brick and Portland stone and comprise a main North-South building with ward wings projecting westwards towards the River Thames. The buildings are typically four storeys with mansard accommodation and feature turrets.



Figure 6 - Historic View of St Thomas's Hospital showing its original form with Westminster Bridge in the foreground. The left block of the Hospital fronts Westminster Bridge Road.

- 2.5 Lambeth Palace Road was laid out at the same time the Hospital was erected and originally ran parallel to the River Thames. In the 1960s Lambeth Palace Road was realigned to the east in order to allow the Hospital campus to expand eastwards. The Hospital's northern section had been damaged by enemy action during the Second World War and in the post-war decades that end of the campus was redeveloped and expanded eastwards to meet the new alignment of Lambeth Palace Road. Most of that work was undertaken in the 1970s by Yorke Rosenberg Mardall (YRM) architects and comprises well-detailed blocks clad in a pale tile which mimics the appearance of Portland stone with contrasting brown metal windows; the effect is successful and provides the northern half of the campus with a strong, cohesive character but one which is architecturally subdued. The individual buildings within the campus are outlined below:

South Wing and Block 9, The surviving parts of the original 1870s building fronting the River Thames. In places degraded by subsequent unsympathetic alteration (prior to listing). Grade II listed buildings and positive contributors to the conservation area. The list description states that these buildings contribute to the setting of the Westminster World Heritage Site. See below.



Figure 7 South Wing as viewed from the West

St Thomas' House

Inter-war brick building at south end of campus adjoining Lambeth Palace Road. In red brick with artificial stone trim A positive contributor to the conservation area This building is to be replaced by the approved Evelina Children's Hospital extension.

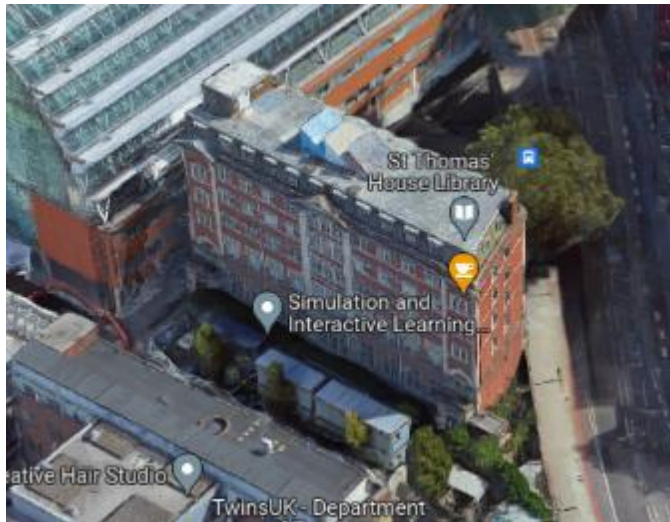


Figure 8 St Thomas' House from Southwest

#### Dunhill Fitness Centre

Two storey, prefabricated post-war building to east of St Thomas' House. Does not make a positive contribution to the conservation area. Not considered to be a non-designated heritage asset. This building is to be replaced by the approved Evelina Children's Hospital extension.



Figure 9 Dunhill Fitness Centre from East

#### North Wing

YRM designed 1970s building. Lower ground plus eight storeys in the YRM signature style / palette. The largest and most prominent of the buildings on the site, its rooftop is cluttered with masts and plant to ill effect. Height - 57m AOD. A neutral contributor to the conservation area due to its calm form and materials. Not considered to be a non-designated heritage asset. See below



Figure 10 North Wing from the Northwest

#### Gassiot House

YRM designed building. Lower ground plus eight storeys in the YRM signature palette. This is the northmost building in the campus and adjoins the northern boundary of the Albert Embankment Conservation Area. Not considered to be a non-designated heritage asset. This building comprises west and east blocks of a height of 32m AOD at right angles to Westminster Bridge Road and facing one another across a courtyard and single storey links. A neutral contributor to the conservation area due to its calm form and materials. It has an inefficient arrangement which does not optimise site potential. See below.

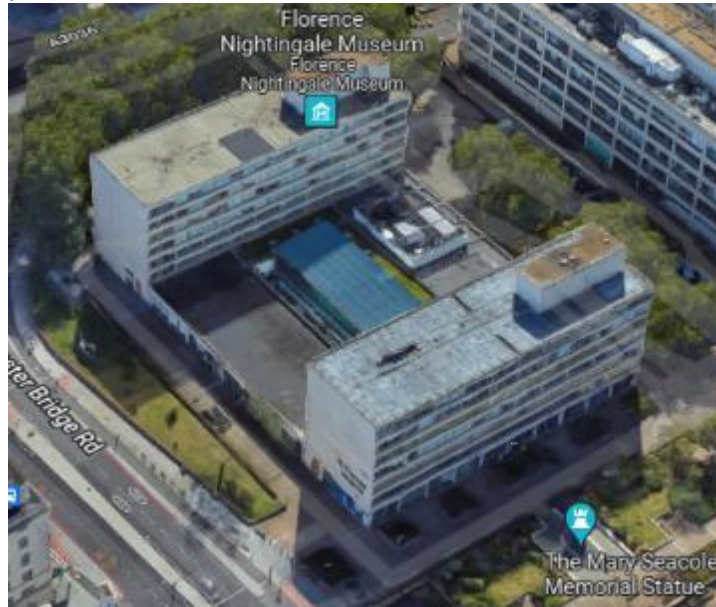


Figure 11 Gassiot House from Northwest

#### Lambeth Wing

YRM designed building. Lower ground plus 6 storeys in the YRM signature style / palette. Height - 31m AOD. Not considered to be a non-designated heritage asset. A basic neutral contributor to the conservation area due to its calm form and materials. See below.



Figure 12 Lambeth Wing from Northeast

## East Wing

T-planned post-war tower that has been over-clad and extended to the sides in the last decade. Height – 57m OAD. Its materials and detailing do not respond to the local distinctiveness of the area. Not considered to be a non-designated heritage asset. See below.



Figure 13 East Wing from Northeast

## A&E

Low-rise YRM designed building fronting Lambeth Palace Road – the least coherent of the YRM buildings on the campus. It does not exhibit the positive characteristics of the wider YRM campus. Not considered to be a non-designated heritage asset. It is not considered to make a positive contribution to the conservation area. See below.

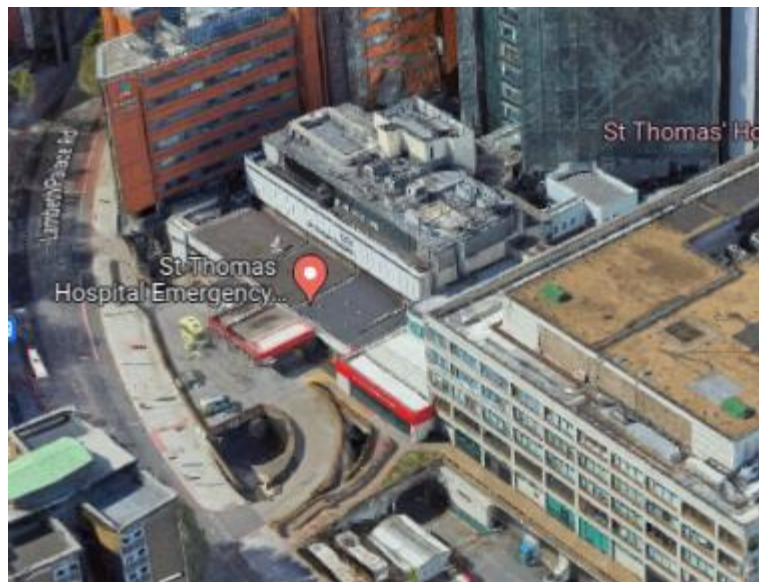


Figure 14 A&E department from the Northeast

Evelina Children's  
Hospital

Seven to eight storey building in terracotta cladding with a large, curved glass roof. Designed by Michael Hopkins & Partners, the building was completed in 2005. It is a high-quality building but is deemed to have a harmful effect on the setting of Lambeth Palace's garden (see later). Height – 39m AOD. Although a quality building by a noteworthy architect, it is not considered to be a non-designated heritage asset. See below.



Figure 15 Evelina Children's Hospital from Southwest

- 2.6 The surviving buildings of the 19<sup>th</sup> Century hospital (South Wing and Block 9) are grade II listed along with the boundary wall to the River Thames and a number of historic sculptures (see later). The hospital is also enriched with numerous public art works including a recent memorial to Mary Secole and a grade II listed fountain.
- 2.7 The YRM designed redevelopment in the 1970s created a new garden in the NW corner of the campus (adjoining Westminster Bridge), a soft landscaped area along the northern edge of the campus (to Westminster Bridge Road) and two soft landscaped spaces to Lambeth Palace Road. The latter spaces contain a number of mature trees. The campus expansion necessitated the loss of an open space named the Stangate Triangle which benefited from protection under the London Square's Preservation Act. It is believed, but unconfirmed, that some of these open spaces on the campus were re-provided in compensation for the loss of the Stangate Triangle.



Figure 16 Mature trees and landscaped spaces are an important amenity at the northern end of the Hospital campus.



Figure 17 - The landscaped area along the northern edge of the campus provides an attractive immediate setting for views into the WWHS in approaches from the east. The Elizabeth Tower terminates the view.

- 2.8 Much of the campus parking is at lower ground level below the garden and segregated from pedestrian activity which is primarily on a pedestrian deck at raised ground level. Accident & Emergency has separate ramped access for ambulance drop off. The principal level pedestrian access into the campus is from Westminster Bridge Road and the main entrance into the Hospital is at the northern end of the complex fronting onto the principal garden space. Vehicular access is off Lambeth Palace Road where parking / servicing areas and ramps have a negative effect on the visual amenity of Lambeth Palace Road.

## Historical Map

2.9 The map below shows the original development of the hospital campus.

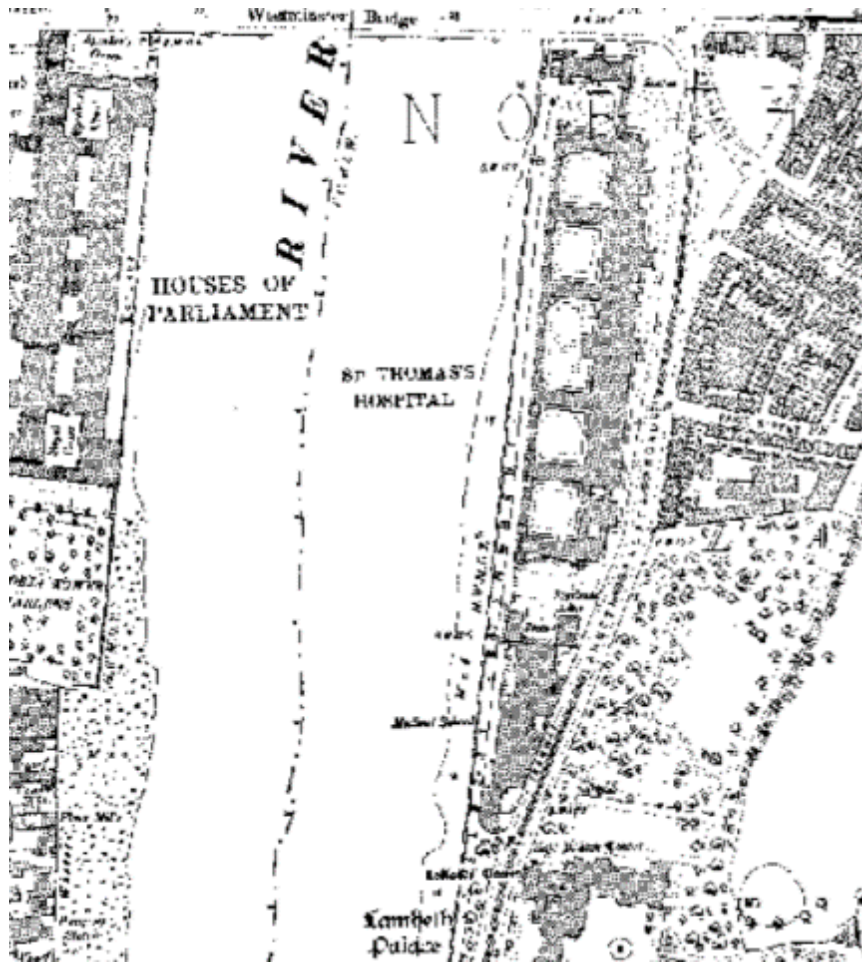


Figure 18 - 1890s OS map – shows the original formal arrangement of hospital wards, the original north south alignment of Lambeth Palace Road, and the Stangate Triangle to the East of the original campus.

## Site Context

### Local Character

- 2.10 Waterloo is a key component of central London and part of the central Activity Zone (CAZ). It is characterised by urban building types largely dating from the 19<sup>th</sup> and 20<sup>th</sup> Century and includes a high concentration of heritage assets. Portland stone is a key building material and pale concrete and tile have been used in the locality to mimic its appearance.
- 2.11 The River Thames is a major landmark within the city allowing extensive views of the Hospital campus from North, West and South. Along with the River Thames, the open landscape character of Lambeth Palace's gardens and Archbishop's Park are a key component of the area's local distinctiveness.
- 2.12 Lambeth Palace Road's northern end is wide and leafy and characterised almost completely by large buildings dating from the second half of the Twentieth Century. However, the Hospital buildings, being set back behind sunken parking / service areas, offer little animation of active frontage here and the pedestrian experience, especially in winter, is

bleak and exposed in spite of a generous public realm. On Westminster Bridge Road Gassiot House presents bland and nondescript elevations to the street – a poor response when compared to the landmark County Hall buildings it faces. The townscape enclosure and character are imbalanced as a result.

### Building Heights

- 2.13 Building heights vary greatly within the locality. The heights within the Lambeth Palace Conservation Area are generally low – 6m (two storeys) to 12m (four storeys) although the new Lambeth Palace Library is a notable exception. Within the St Thomas's Hospital campus, the heights vary greatly too; with the surviving Victorian wings generally being 5 generous storeys. The tallest blocks are The North Wing and East Wing which stand at c55m AOD. At the northern end of the Hospital campus Gassiot House's twin blocks are 32m AOD at their highest points. Opposite, within the Southbank Conservation Area County Hall stands at 43m AOD and County Hall South Block at 36m AOD.

### Building Uses

- 2.14 Healthcare and health education buildings occupy the whole Hospital campus.

### Heritage Assets

- 2.15 There are several designated heritage assets within the campus, the following are particularly near the site allocation and this particularly worthy of consideration –

- Hospital's Victorian buildings (South Wing)– Grade II
- Statue of Edward VII (external) – Grade I listed
- Statue of Edward VII (internal) – Grade I listed
- Torsion Fountain – Grade II listed
- Boundary wall to River Thames – Grade II listed

- 2.16 The list description for the South Wing states:

*“Notwithstanding its reduced state, the South Wing of St Thomas' Hospital is one of London's most prominent and distinguished riverside buildings, and has outstanding group value with Westminster Palace, a World Heritage Site. “*

- 2.17 The whole campus also sits within the Albert Embankment Conservation Area (AECA) which extends southward from Westminster Bridge to Vauxhall taking in the whole River Thames frontage. Detailed analysis can be found in the Albert Embankment Conservation Area Character Appraisal, 2017. The Appraisal document identifies the Hospital campus as a character area in its own right.

- 2.18 Adjoining the site are the following designated heritage assets:

- 2.19 The Palace of Westminster, a key component of the 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.

2.20 The UNESCO Website identify 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.

- 2.21 St Thomas' Hospital campus sits within the wider urban context of the WWHS in views from the Westminster side of the River and from the River Thames Bridges. The most impressive views of the World Heritage Site are designated as Strategic Views in the London Plan. Protected silhouette designations within some of these London Plan Strategic Views place a strict height constraint on the St Thomas' Hospital campus when viewed from Parliament Square (see later). The effect of development on the setting of this internationally recognised designated heritage asset is a key consideration. Especially in views from the area encompassing Great George Street / Parliament Street / the northern side of Parliament Square.
- 2.22 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.
- 2.23 The Southbank Conservation Area (SBCA) adjoins the Hospital campus to the north. Detailed analysis can be found in the Southbank Conservation Area Statement, 2007. The nearest buildings are the Grade II\* listed County Hall and the locally listed County Hall South block which stand on the either side of Westminster Bridge Road. These buildings are in Portland stone, date from the first half of 20<sup>th</sup> Century and share common characteristics in relation to architectural style, materials, and parapet line. They present formal, high-quality elevations to Westminster Bridge Road. By contrast, Gassiot House opposite provides an inadequate counterpart in townscape terms being lower and presenting blank flanks to Westminster Bridge Road. Redevelopment of the Hospital campus here presents an opportunity to enhance the setting of the Southbank Conservation Area and these designated and non-designated heritage assets within it.

- 2.24 The County Hall, Westminster Bridge Road, is a grade II\* listed building with a grand, formal elevation to the River Thames. Its river-facing elevation is the subject of a Strategic View (see later).
- 2.25 The Lambeth Palace Conservation Area (LPCA) adjoins to the SE of the campus includes Archbishop's Park and Lambeth Palace's private gardens / complex including the new Lambeth Palace Library. Detailed analysis can be found in the Lambeth Palace Conservation Area Character Appraisal, 2017. The northern periphery of the Lambeth Palace Conservation Area, the part nearest the St Thomas' campus, partially lies within Site Allocation no. 01 'Royal Street'. The two conservation areas abut along a short section of Lambeth Palace Road.
- 2.26 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. Tree planting along much of the perimeter, and high boundaries limit public views in. Within the landscape numerous adjoining properties are visible - especially Evelina Children's Hospital – although this is partially screened by the recently completed Lambeth Palace Library and will be further screened by the approved Evelina Hospital extension.



Figure 19 – View from Lambeth Palace garden looking north. The Lambeth Palace Library occupies the foreground. The glazed roof behind it is the Evelina Children's Hospital and the post-war tower beyond is the St Thomas' East Wing

- 2.27 Lambeth Palace is a grade I listed complex of historic buildings located to the southeast of the Hospital Campus. 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 a number of 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 sensitive to change within the site allocation site.

- 2.28 Westminster Bridge is a grade II\* listed building linking Lambeth to Westminster across the River Thames. It falls within both boroughs. It is not within the Westminster World Heritage site. Its setting is not considered vulnerable to change that might occur within the site allocation site.
- 2.29 The following Non-Designated Heritage Assets are relevant:
- 2.30 The campus sits within the North Lambeth Archaeological Priority Area which is non-designated asset (archaeological) recognised through Policy Q23 (local heritage list) of the Revised Lambeth Local Plan (2021).
- 2.31 Two nearby assets are on the Council's Local heritage List:
- County Hall South Block, York Road / Westminster Bridge Rd (structure) adjoins to the north (see earlier)
  - Archbishop's Park is local heritage list landscape. Largely rectangular and aligned North-east to South-west the park adjoins the East boundary of Lambeth Palace's private garden. It is laid out with a perimeter walk. The Southern part of the park is largely open and retains its restful early 20th century character of lawns, mature trees and perimeter planting to the boundaries. Some attractive early 20th Century timber shelters also survive. The South and East sides are bounded by trees through which are glimpsed the unobtrusive rear boundaries of adjoining properties. To the North of the park, there are entrances onto Lambeth Palace Road and one on Carlisle Lane. The Northern part of the park retains its original structure but now includes enclosures, play equipment, sports areas and the modern installations which tend to give a cluttered appearance. However, in its widest sense the spacious and leafy character of the park, its mature trees and attractive planting, combined with glimpse views out are all important positive elements in the conservation area.

## **Designated Views**

### **Strategic Views**

- 2.32 The following London Plan views are relevant to this site:

#### **Strategic View 17A.2**

- 2.33 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 20 extract from LVMF showing view from Assessment Point 17A.2

#### Strategic View 18A.3 Westminster Bridge: Upstream

2.34 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.'*

- 2.35 At Assessment Point 18A.1 the viewer is in Lambeth looking towards Westminster. The St Thomas's Hospital campus is off camera to the left. For that reason, this view has been discounted from assessment. 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 to the left. This view has been discounted from assessment.
- 2.36 From Assessment Point 18A.3 the view looks across the River Thames and the whole of the St Thomas' campus's river frontage is visible in the view. The buildings which occupy the site allocation locations play a minimal role in the view composition. Gassiot House is visible to the left of the view. A&E and the Lambeth Wing are largely screened by the North Wing but the latter peeks out to its left but is largely screened by middle ground trees. See extract view from LVMF below.



Figure 21 extract from LVMF showing view from Assessment Point 18A.3

#### Strategic View 19A Lambeth Bridge: Downstream

- 2.37 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 19A.2 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.’

- 2.38 In View 19A.1 The St Thomas’ Hospital campus occupies the right side of the view. Neither of the Indicative approach sites or current buildings are visible as they are screened by other buildings on the Hospital campus.



Figure 22 Extract from LVMF showing View from Assessment Point 19A.1

- 2.39 In view 19A.2 the hospital campus is on the extreme right with only the North Wing visible.



Figure 23 Extract from LVMF showing View from Assessment Point 19A.2

#### Strategic View 20A.1 Victoria Embankment between Waterloo and Westminster Bridges

- 2.40 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).’

- 2.41 County Hall occupies the centre with the Shell Centre/ Southbank Place and London Eye to its left and the St Thomas Campus to its right. Whilst the North Wing is the most noticeable element of the campus in the view, both Gassiot House and part of the Lambeth Wing visible



Figure 24 Extract from LVMF showing View from Assessment Point 20A.1

#### View 27B Parliament Square: North Pavement

- 2.42 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.'*

- 2.43 From Assessment Point 27B.1 the Hospital campus is largely screened by the Palace of Westminster. However, Gassiot House is glimpsed to the left of the Elizabeth Tower in its backdrop.



Figure 25 Extract from LVMF showing View from Assessment Point 27B.1

- 2.44 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 26 Extract from LVMF showing View from Assessment Point 27B.2

### Local Views

- 2.45 The following views are designated within Draft Revised Lambeth Local Plan Policy Q25 (c):

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

- 2.46 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.’*

- 2.47 Only the top storeys of the largest of the buildings within the St Thomas’s Hospital campus are visible in this view. The indicative approach heights would not register in the view because of foreground development. This view has been discounted from assessment.

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

- 2.48 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...’*

- 2.49 Only the top storeys of the largest of the buildings within the St Thomas’s Hospital campus are visible in this view. The indicative approach heights would not register in the view because of foreground development. This view has been discounted from assessment.

#### Routes, Access, Servicing and Public Realm

- 2.50 The principal pedestrian entrance from Westminster Bridge Road has generous public realm, the entrance area is attractive and the main entrance legible.
- 2.51 All vehicular servicing is from Westminster Bridge Road.
- 2.52 The entire hospital campus sits within Lambeth’s approaches to the Westminster World Heritage Site – the public realm experienced by those approaching the World heritage Site from Waterloo. These approaches were mapped and defined by Lambeth as evidence for the Lambeth Local Plan, 2021. Local Plan Policy Q19 seeks to ensure that the public realm in the approaches is of high quality.
- 2.53 The River Thames, Albert Embankment Walk, the land on the western side of the Hospital campus, the Hospital Garden and land to the north and south of Gassiot House, as well as much of Westminster Bridge Road and Westminster Bridge are also within the immediate setting of the Westminster World Heritage Site. This was defined as part of the evidence to the Lambeth Local Plan, 2020. The immediate setting is the foreground area in Lambeth of the World Heritage Site where its Outstanding Universal Value (OUV) can be appreciated. The objective of designation is to ensure better management of that place and ensure that no development harms an appreciation of OUV.

#### Green Infrastructure

- 2.54 The river frontage of the Hospital campus is lined with mature London Plane trees which are of very high amenity value. Similarly, there is an attractive group of mature planes on the frontage of Lambeth Palace Road at Block 9 and the Prideaux Building.
- 2.55 Mature trees to the southern and eastern side of Gassiot House have a high amenity value along with those adjoining Westminster Bridge on Westminster Bridge Road.

- 2.56 The principal Hospital Garden is raised on a deck over lower ground floor parking and as a result its soft landscaping is generally limited to shrubs and small trees in purpose-built planters. The space still has high amenity value.
- 2.57 The soft landscaped strip to the north of Gassiot House contains some trees and shrubs and has amenity value. The contribution it makes to the openness of Westminster Bridge Road is of value as it allows the Elizabeth Tower (a key component of the Westminster World Heritage Site) to be appreciated by pedestrians on the approach from the east.

### **Planning and Emerging Context**

- 2.58 Planning permission has been implemented for the redevelopment of the Prideaux Building and the extension and refurbishment of Block 9 which are both occupied by King's College London and sit immediately south of the St Thomas's Hospital campus. Case ref. 16/02387/FUL. The extension to the Evelina Hospital, which would replace St Thomas' House and Dunhill Fitness Centre (see Figure 29) has grant permission. Case ref. 21/01869/FUL.
- 2.59 Policy PN1 'Waterloo and South Bank' of the Lambeth Local Plan sets out the policies for the neighbourhood. Annex 10 of the Lambeth Local Plan identifies locations deemed suitable for tall building development. It includes land to the immediate east of the Hospital Campus - Location 7 (Beckett House)– Lambeth Palace Road / Upper Marsh – 60m AOD), and Location 8 – (Stangate House / Canterbury House) Royal Street / Upper Marsh – 50m AOD). These buildings are subject to their own draft Site Allocation Policy (SA01).
- 2.60 The Annex 10 heights are the result of an extensive body of evidence work undertaken as part of the statutory plan making process a summary of which is provided below.
- 2.61 In their Westminster World Heritage Site Setting Study, 2018, Miller Hare undertook a ground-breaking three-dimensional assessment of the extent of the protected silhouette designations within the London Plan / LVMF. These silhouettes set very precise limits on development heights across much of the wider WHS context. Additionally, further work was undertaken with representatives from key WWHS stakeholders – GLA, Historic England and Westminster City Council in order to reach conclusions on a reasonable upper development height for development in Lambeth visible from the north side of Parliament Square. For an explanation, please see the Lambeth tall Buildings Topic Paper, 2019. That work informed the massing studies within the Waterloo Building Height Study 2018 which ultimately support the general tall buildings heights set in Annex 10 of the Lambeth Local Plan.
- 2.62 The Annex 10 Location most relevant to St Thomas' Hospital is Location 7 (Beckett House, Lambeth Palace Road) which stands to the immediate east of the Hospital campus beside Lambeth Wing and Gassiot House and appears, along with the adjoining Urbanest building, in the backdrop of Gassiot House in views from the North side of Parliament Square.
- 2.63 A general height of 60m AOD was identified as appropriate for the Beckett House site. That height accords with the height of the adjoining Urbanest Building. It is important that development in front of these buildings (within the Hospital campus), when viewed from the north side of Parliament Square, appears subordinate to them.

## **Site Constraints and Opportunities**

2.64 The site constraints and opportunities are set out in the table below.

### **Constraints**

#### Trees of value

- The mature trees to the east and south of Gassiot House

#### Amenity space

- The main hospital garden in the NE corner of the campus is of high amenity value and the view location of an important locally designated view of Palace of Westminster
- The creche garden east of Gassiot House has important amenity value.
- 
- The principal garden in the NW corner of the Campus has important amenity value.

#### Westminster World Heritage Site setting

- The protected silhouette in Strategic view 27A and B limits over all height on the Campus to c70 AOD. See Westminster World Heritage Site Setting Study, 2018
- To accord with the design parameters set by the evidence to the Lambeth Local Plan, 2021, when viewed from the N side of Parliament Square development within the Hospital should be subordinate to the Urbanest Building in order to maintain an unobtrusive effect on the setting of the WWHS
- There are some places within Strategic View 27 where Gassiot House and Lambeth Wing currently attach themselves to the Elizabeth Tower

### **Opportunities**

#### Lambeth Palace Road

- Redevelopment here presents opportunities to improve the Hospital's street frontage.
- Consolidation of roof-top plant to improve appearance of the blocks.

#### Westminster Bridge Road

- Redevelopment here presents opportunities to activate the building frontage and improve the sense of enclosure of this important gateway route.

#### YRM campus style and palette

- The YRM buildings give the northern part of the campus a strong and unified identity due to their calm architecture and Portland stone-like colour. It contributes to local distinctiveness of Waterloo.

- The landscaped strip to the north of Gassiot House allows important views of Elizabeth Tower from the east.

#### Heritage assets

- The settings of numerous heritage assets must be preserved. In particular the, Palace of Westminster, Westminster Bridge, County Hall, Lambeth Palace, South Bank CA , Lambeth Palace CA.
- Albert Embankment Conservation Area's special interest must be preserved in accordance with the adopted Conservation Area Character Appraisal (2017)

#### Residential Adjacencies

- The County Hall South Block is a residential building. It stands to the north side of Westminster bridge Road immediately opposite Gassiot House. It is understood that many of the units there are single aspect.
- Stangate House stands across Lambeth Palace Road to the east of A&E

### 3. Design Approach

#### Key Principles

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

<b>A</b>	<b>Respect Heritage Assets</b>
	<p>Cause no harm to the Outstanding universal Value (including setting) of the Westminster World Heritage Site by:</p> <ul style="list-style-type: none"> <li>Ensuring building heights are sensitive in views from Westminster in particular those from Parliament Square -strategic view 27B.2 in particular</li> </ul> <p>Cause no harm to the significance of the Albert Embankment Conservation Area</p> <p>Cause no harm to the setting of designated and non-designated assets; especially County Hall and County Hall South Block</p>
<b>B</b>	<b>Retain existing open spaces and ensure adequate sunlight to them</b>
	<p>(i) The principal Hospital garden.</p> <p>(ii) The creche garden to the east of Gassiot House.</p> <p>(iii) Linear landscaping belt to north of Gassiot House.</p>
<b>C</b>	<b>Retain trees of value</b>
	<p>(i) Groups of mature trees east and south of Gassiot House</p>
<b>D</b>	<b>Townscape</b>
	<p>(i) Improve the townscape quality, building animation, and sense of enclosure to Lambeth Palace Road</p> <p>(ii) Improve the townscape quality, building animation and sense of enclosure to Westminster Bridge Road</p>
<b>F</b>	Retain heritage assets and art works on the hospital campus
<b>G</b>	Have no unacceptable effects on the amenity of residential neighbours.

## 4. Indicative Approach

### Indicative Approach - Overview

- 4.1 The Indicative Approach, due to the numerous constraints, limits change to the replacement of the existing YRM blocks to the northeastern end of the Hospital campus where it fronts Lambeth Palace Road and Westminster Bridge Road. Block A's footprint is largely unchanged from the Regulation 18 consultation but the height has been lowered to 40m AOD (maximum). Block B's footprint has been slightly enlarged where it abuts the Hospital's East Wing but its upper floors at its northern end have been cut back in response to the setting of the WWHS (see later).



Figure 27 - Indicative Approach Blocks A (green) and B (pale yellow) viewed from above. The darker yellow block at the bottom of the image is the Evelina Hospital extension approval.

### Indicative Approach - Layout and Access

- 4.2 Gassiot House is replaced by Indicative Approach Block A. Tree and open space constraints to the north, east and south of Gassiot House prevent its footprint being enlarged in those directions. However, it is considered that there is scope to advance westward by 10m with a colonnade over the main pedestrian walkway into the campus. See below.

- 4.3 The Indicative Approach Block B replaces the Lambeth Wing and A & E buildings and extends eastward to Lambeth Palace Road to include the current parking area. The building line is 10m back from the back of pavement on Lambeth Palace Road to provide a spacious public realm and this results of a façade-to-façade width across Lambeth Palace Road of around 40m. Vehicular access is maintained off Lambeth Palace Road.

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

- 4.4 Indicative Approach Block A to is 40m AOD (maximum) in height which is a modest increase on Gassiot Houses' existing 32m height and considered subordinate to the 60m general building height deemed suitable for Beckett House to its east (see Annex 10 Lambeth Local Plan). The 40m AOD is also comparable to the height of The County Hall complex opposite which is of heritage sensitivity. Ultimately any building on the Gassiot House footprint would need respond to this sensitive context in terms of massing, materials etc., perhaps even mirroring County Hall's parapet line. The rough massing illustration below indicates the general effect.



Figure 28 – Existing townscape on Westminster Bridge Road. Note that the absence of enclosure or balanced townscape.



Figure 29 – Sketch illustration (not to scale) indicative the desired massing / townscape effect of Indicative Approach Block A (Gassiot House site) at Westminster Bridge Road. A strong sense of enclosure is created which is more fitting for this city centre context.

- 4.5 The separation distance between Gassiot House and County Hall South Wing is around 45m and with the Indicative Approach Block A at a similar height, the resulting sense of enclosure from a development height of 40m accords with the guidance in the National Model Design Code (page 52) which states:

*‘Enclosure: The proportion of width to building height will change by area type. In city centres, local centres and on high streets the space will feel comfortable with building heights equal or greater than the width of the space between them....’*

- 4.6 Indicative Approach Block B has a height of 40m (44m AOD) (maximum). This block will thus be of subordinate height to the North Wing (c55m) and the East Wing (c55m) and the recently approved Evelina Hospital extension (c55m) which set a clear upper height limit for the Hospital campus. The building line of Indicative Approach Block B is brought forward closer to Lambeth Palace Road to give a more positive relationship to the street than the current post-war arrangement.
- 4.7 The proposed heights of Indicative Approach Blocks A and B are below the 45m threshold definition of a tall building in this location. Whilst they are not tall buildings, the high sensitivity of their context will call for a level of analysis and design excellence commensurate with any required for a tall building application.
- 4.8 The remaining buildings within the campus have not been included in the site allocation due to the high sensitivity of their context. For example, the tallest buildings on the campus (East Wing and North Wing) are already a substantial presence in views up and down the River Thames so their further upwards extension has not been explored. The remaining unlisted buildings on the campus are St Thomas’ House and the Dunhill Fitness Centre which are to be replaced by the approved Evelina Hospital extension. What remains - the listed buildings - do not present an opportunity for redevelopment.



Figure 30 - Indicative approach Blocks A (green) and B (pink) as viewed from SW.

#### Indicative Approach - Daylight and Sunlight

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

## 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 several 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 All the tested views are in Appendix 1. Summary findings are set out below.

### Effect on Designated Views

- 5.5 These are identified in the London Plan and guidance on each view is provided within the London View Management Framework. Summary findings, along with the relevant LVMF visual management guidance, are set out below.

View	View Name	Effect
View 1	Strategic View 17A.2 - Hungerford Bridge Upstream	<p><i>The LVMF management guidance states:</i></p> <p><i>'290 Development should contribute to the settings of spaces and buildings immediately fronting the river, including the Strategically Important Landmark of the Palace of Westminster.</i></p> <p><i>291 Development proposals likely to affect the World Heritage Site should pay regard to the guidance set out in the Westminster World Heritage Site Management Plan. It is recommended that English Heritage is consulted on all relevant proposals at an early stage.</i></p> <p><i>Foreground and Middle Ground</i></p> <p><i>292 Development should not cause adverse impact to the World Heritage Site and should not compromise a viewer's ability to appreciate its Outstanding Universal Value. Landmarks also</i></p>

*make an important contribution to the skyline and they should not be obscured by new development.'*

The Indicative approach models are screened by the roof of County Hall. There is no effect on this view.

View 2 Strategic View 18.A.3 - Westminster Bridge upstream

There are three viewing locations. 18A.1 and 18A.2 look towards the Westminster World Heritage Site. However, 18A.3 looks towards Lambeth. The LVMF visual management guidance 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 Indicative Approach models sit comfortably within the context – allowing the North Wing of the Hospital to retain its compositional primacy. The silhouette of the historic hospital buildings is unaltered. The general composition of the view is preserved. No harm.

View 3 Strategic View 19.A1 Lambeth Bridge looking downstream towards the Palace of Westminster

In terms of visual management guidance 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.'*

The Indicative approach Block A is completely screened by the the larger buildings on the Hospital campus. Indicative Approach Block B is largely screened by middle ground buildings. The effect on the campus townscape is minor, the effect on the view as a whole is negligible. The WWHS (off camera to the left) remains the dominant form in the composition. No harm.

View 4 Strategic View 20A.1 - River Prospect Victoria Embankment between

The LVMF visual management guidance states:

	Waterloo and Westminster Bridge Westminster Pier to County Hall	<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 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.'</i></p> <p>The indicative approach models are seen off the right of County Hall. They do not disrupt the silhouette of the County Hall. Their sympathetic heights and massing cause no harm to the setting of County Hall. No harm.</p>
Views 5 & 6	Strategic View 27B.1 and 27B.2 - Palace of Westminster from north side of Parliament Square	<p>The LVMF visual management guidance states:</p> <p><i>'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.</i></p> <p><i>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.'</i></p> <p>27B.1 - Only Indicative Approach Block A is visible in this view. It is lower than the existing backdrop building in the view (Urbanest) which sets the datum for development here and its</p>

effect on the townscape backdrop will be negligible. The composition of the view is maintained, the primacy of the Elizabeth Tower is respected, the setting of the Palace of Westminster is preserved; and the OUV of the WWHS is sustained. No harm

27B.2 - The Indicative approach meets the guidance in the LVMF by maintaining a full appreciation of the Elizabeth Tower's existing silhouette.

- 5.6 In relation to view 27B, Gassiot House at the NE corner of the campus is visible to the left of the Elizabeth Tower and thus sits within the wider setting of the WWHS. The effect of development on the site of the adjoining Beckett House (immediately behind Gassiot House in the view) has already been explored in detail within the tall buildings evidence for the Lambeth Local Plan, 2021. See Waterloo tall Buildings Study, 2018 and Lambeth tall Building Topic Paper, 2019. The c60m building height identified for Location 7 in the Annex 10 map within the Lambeth Local Plan reflect the findings of that analysis. Gassiot House, sitting closer to the WHS than Beckett House, is subject to the same heritage sensitivities.

#### Effect on Townscape

- 5.7 Five 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:

View	View Name	Effect
View 7	Westminster Bridge (western end near Boudica statue) looking east	Annex 10 of the Lambeth Local Plan identifies Beckett House as a location appropriate for a tall building and identifies a general height which would be comparable with the Urban Nest building to its left. Indicative Approach Block A stands in front of these buildings and appears lower. The massing of both Blocks is comfortable in this townscape context.
View 8	Westminster Bridge at Albert Embankment steps	The increase in height created by Block A creates a built form which positively presents an elevation to Westminster Bridge Road (something the current Gassiot House lacks). Assuming that the new campus buildings follow the pale palette of the existing post-war Campus buildings the general effect will be positive – bringing a uniform of height and colour to the Hospital campus frontage.
View 9	Great George St at junction with Little George Street	The Indicative approach Block A rises no higher than the Urbanest building which sets the height

		datum for background development in this view. The townscape effect is positive, the setting of Elizabeth Tower is preserved. The OUV of the WWHS is sustained. No harm.
View 10	Archbishops Park (northwestern corner)	The effect on the setting of the Lambeth Palace Conservation Area and the setting of Archbishop's Park is negligible.

### Effect on Heritage Assets

5.8 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.

5.9 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).'*

5.10 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 ‘*

5.11 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.

5.12 Objective results have been achieved by using the table below in Figure 33 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.

VALUE	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 31 – Magnitude of Impact can be assessed using the table above

5.13 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.

## Approaches to Westminster World Heritage Site (WWHS)

### Contribution made to setting

- 5.14 Whilst not technically a heritage asset their importance to the WWHS is the reason for their inclusion here. The approaches are the environment which visitors to the WWHS pass thorough on their journey to and from it. Policy Q19 seeks to ensure an uncluttered, high quality and attractive environment. The public realm approaches near this site allocation (Lambeth Palace Road, Royal Street, Carlisle Lane in particular) are poor at present and therefore detract from the visitor experience.

### Effect of Indicative Approach

- 5.15 The indicative approach does not change the public realm approaches. However, the improved architecture and more traditional enclosure of the street frontage to Westminster Bridge Road is likely to be beneficial to the approaches.

## Westminster World Heritage Site

### Contribution made by setting

- 5.16 See separate Heritage Impact Assessment (HIA).

### Effect of Indicative Approach on Significance

- 5.17 No harm results. For details see views in Appendix 1 and separate HIA.

## Albert Embankment CA

### Contribution made by setting

- 5.18 This is an extensive conservation area taking in the River Thames frontage and much development along it including the St Thomas' Hospital campus which is its largest character area. The Albert Embankment CA's river frontage (Which includes the garden at St Thomas' Hospital) provides an important vantage point from which to appreciate the WWHS. The Adopted Character Appraisal (2017) states:

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

### Effect of Indicative Approach on Significance

- 5.19 High value asset. Minor change within it. Magnitude of Impact is Moderate. Indicative Approach Block A will enhance the Albert Embankment Conservation Area by replacing

Gassiot House with a building that better addresses Westminster Bridge Road at the principal pedestrian entrance into the campus. The Indicative Approach B will enhance the Hospital frontage of Lambeth Palace Road. With high quality architecture and a palette of materials that mimics / reinforces that of the retained post-war buildings will ensure a beneficial effect on the significance of Albert Embankment Conservation Area.

### Edward VI statue

#### Contribution made by setting

- 5.20 Grade I - This statue stands outside the Hospital north wing entrance facing towards Gassiot House. It was moved to this location relatively recently. It is not reliant on this setting for its significance other than its placement within this hospital campus (historic interest).

#### Effect of Indicative Approach on Significance

- 5.21 High value asset. Negligible change to setting. Magnitude of Impact is Slight. The immediate environment of the statue will change with the increase in footprint and redevelopment of Gassiot House and the Lambeth Wing but there will be no adverse effect on setting or significance.

### The County Hall

#### Contribution made by setting

- 5.22 Grade II\* - Before Second World War destruction the 19<sup>th</sup> Century Hospital had a conventional street frontage to Westminster Bridge Road opposite County Hall. County Hall stands opposite St Thomas' garden and diagonally Gassiot House on Westminster Bridge Road.
- 5.23 The post-war redevelopment of this end of the campus has been both beneficial and neutral on the setting of County Hall. The beneficial effect comes in the form of the St Thomas' Hospital garden which provides a good vantage point from which to appreciate the architecture of the South elevation of County Hall. The neutral effect comes from Gassiot House which has insufficient townscape presence and presents two blank flanks to County Hall

#### Effect of Indicative Approach on Significance

- 5.24 High value asset. Minor change to setting. Magnitude of Impact is Slight. County Hall's relationship with St Thomas' Garden will remain unchanged so the beneficial effect remains. Indicative Approach A (the redevelopment of Gassiot House) presents the opportunity to improve the sense of enclosure along Westminster Bridge Road addressing the current imbalanced townscape and bring conventional activation to the road frontage. With high quality architecture and a palette of materials that reinforces that of the existing campus the setting of County Hall will be enhanced.

### St Thomas' Hospital Victorian Buildings

#### Contribution made by setting

- 5.25 Grade II –These are best appreciated from the West (River Thames and its embankments). The list description states that have group value with the Palace of Westminster. This is best appreciated in Strategic Views from Westminster Bridge and Lambeth Bridge and from the Palace of Westminster itself. These buildings are separated from Indicative Approach sites A and B by the significant masses of the North Wing and East Wing of the Hospital campus. East Wing, Evelina Hospital and the approved Evelina Hospital Extension sit in their backdrop when viewed from the Palace of Westminster.

#### Effect of Indicative Approach on Significance

- 5.26 High value asset. No change to setting. Magnitude of Impact is Neutral. The important river frontage of these buildings remains unaltered. So too does their backdrop of modern Hospital buildings.
- 5.27 Whilst Indicative Approach B will be visible between the North Wing and the East Wing it will be smaller than both. It is not considered that glimpse visibility here (or from Lambeth bridge) will have any effect on the significance of these buildings or diminish the group value with the Palace of Westminster.

### Torsion fountain

#### Contribution made by setting

- 5.28 Grade II\* – On Loan from Tate Gallery and standing in the principal garden of the hospital to the east of Gassiot House. The fountain relies on the public Hospital Garden for its setting. The enclosing buildings play no role in its significance.

#### Effect of Indicative Approach on Significance

- 5.29 High value asset. No change to setting. Magnitude of Impact is Neutral. Indicative Approach Site A is nearby but its redevelopment will not affect the significance of the fountain.

### Lambeth Palace Gardens

#### Contribution made by setting

- 5.30 Registered Landscape –located a little distance to the south of the A&E building with the Evelina Hospital. The Evelina Hospital approval (case ref. 21/01869/FUL) will be nearest hospital structure.



Figure 32 View from Lambeth Palace's garden showing the Lambeth Palace Library along with a CGI image of the approved Evelina Hospital extension. Figure 19 gives a comparable current view.

#### Effect of Indicative Approach on Significance

5.31 High value asset. Minor change to setting. Magnitude of Impact is Moderate. The recently completed Lambeth Palace Library and the Evelina Hospital effectively screen the Indicative Approach from views within the garden. The effect on setting will be nil.

#### Lambeth Palace

##### Contribution made by setting

5.32 Grade I listed group of historic buildings separated from the southern end of Indicative Approach B by Evelina Hospital, Lambeth Palace Library and Lambeth palace garden.

5.33 The Palace is in effect a self-contained estate. The historic buildings are focused on the southern end of the estate where Lambeth Road meets Lambeth Bridge. Lambeth Palace's significance is completely unrelated to St Thomas' Hospital which largely makes a neutral and effect on its setting. Lambeth Bridge is the best place to appreciate the Hospital's relationship with the Palace on the banks of the River Thames. Westminster Bridge offers less scope due to tree screening.

#### Effect of Indicative Approach on Significance

- 5.34 High value asset. No change to setting. Magnitude of Impact is Neutral. The recently completed Lambeth Palace Library and the Evelina Hospital effectively screen the Indicative Approach from views within the garden.
- 5.35 In views from Lambeth bridge the Indicative Approach Block A is not visible. Indicative Approach Block B is glimpsed between North Wing and East Wing but this will have no effect on the significance or setting of Lambeth Palace. No harm results.

#### Lambeth Palace Conservation Area

##### Contribution made by setting

- 5.36 At its closest to the Site Allocation this CA stands to the east southeast of the St Thomas' A&E buildings (Indicative Approach Site B) on the opposite side of Lambeth Palace Road – comprising Archbishops Park and the buildings on the south side of Royal Street. The significance of the CA is not reliant on St Thomas' Hospital.

#### Effect of Indicative Approach on Significance

- 5.37 High value asset. Minor change to setting. Magnitude of Impact is Minor. The replacement of the A&E building with high quality architecture and a palette of materials that reinforces that of the existing campus buildings will have a beneficial effect on the setting of the LPCA in views from Lambeth Palace Road.

#### South Bank Conservation Area

##### Contribution made by setting

- 5.38 The replacement of the A&E building with high quality architecture and a palette of materials that reinforces that of the existing campus buildings will have a beneficial effect on the setting of the LPCA in views from Lambeth Palace Road. This stands to the immediate north of the campus and the nearest buildings are County Hall and County Hall South Block. The Conservation Area's setting benefits from the St Thomas' Hospital Garden (allowing views of County Hall's flank) but otherwise the Hospital does not contribute to the significance of the Southbank CA. Gassiot House is considered to detract from the setting due to its relationship with The County hall (see above).

#### Effect of Indicative Approach on Significance

- 5.39 High value asset. Minor change to setting. Magnitude of Impact is Slight. With high quality architecture and a palette of materials that reinforces that of the existing campus buildings, Indicative Approach B has the potential to improve on the current relationship created by Gassiot House and enhance the setting of the Southbank CA.

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

Contribution made by setting

- 5.40 This stands to the immediate north of the campus opposite Gassiot House. The building is an inter-war office block built to provide over-spill from County Hall and is in a similar architectural style.

Effect of Indicative Approach on Significance

- 5.41 Medium value asset. Minor change to setting. Magnitude of Impact is Slight. The massing of the Indicative Approach at Gassiot House is similar to that of South Block. In townscape terms the effect will be beneficial in terms of improving the sense of townscape enclosure. With high quality architecture and a palette of materials that reinforces that of the existing campus buildings the setting of County Hall South Block will be enhanced.

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

Contribution made by setting

- 5.42 This lies to the Southeast of the A&E building across Lambeth Palace Road. Visitors existing the park at Lambeth palace Road look across to the A&E building.

Effect of Indicative Approach on Significance

- 5.43 Medium value asset. Minor change to setting. Magnitude of Impact is Slight. The replacement of the A&E building with high quality architecture and a palette of materials that reinforces that of the existing campus buildings is likely to have a beneficial effect on the setting of the park. With tree screening and separation, the effect on views from within the park is likely to be negligible.

### **Summary of Effects**

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

View	View / Asset Name	Effect
View 1	Strategic View 17A.2 - Hungerford Bridge Upstream	No effect.
View 2	Strategic View 18.A.3 - Westminster Bridge upstream	No harm to view.
View 3	Strategic View 19.A1 Lambeth Bridge looking downstream towards the Palace of Westminster	No harm to view.
View 4	Strategic View 20A.1 - River Prospect Victoria Embankment between	No harm to view.

	Waterloo and Westminster Bridge Westminster Pier to County Hall	
Views 5 & 6	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 7	Westminster Bridge (western end near Boudica statue) looking east	No harm to townscape.
View 8	Westminster Bridge at Albert Embankment steps	No harm to townscape.
View 9	Great George St at junction with Little George Street	No harm to townscape.
View 10	Archbishops Park (northwestern corner)	No harm to townscape.
	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
	Edward VI statue (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
	Torsion Fountain (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
	Southbank 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

4.45 The effects of the Indicative Approach are considered acceptable.

## 5. Conclusion

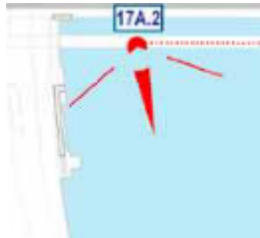
- 5.1 The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure acceptable impacts in relation to daylight and sunlight, views, townscape, and heritage. This analysis has found the approach to successfully address the 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.

Topic	Recommendation
Height	<p>The sites of Gassiot House, Lambeth Wing and A&amp;E along the eastern part of the Hospital campus are suitable for increased height:</p> <ul style="list-style-type: none"> <li>• Block A (site of Gassiot House) – 40m AOD maximum</li> <li>• Block B (site of Lambeth Wing and A&amp;E) – 44m AOD maximum</li> <li>• The site is not within a location identified as appropriate for tall buildings, defined as above 45m in this location. The heights above are dictated by sensitivity in relation to the settings of the Westminster World Heritage Site and County Hall in views from the west.</li> <li>• A 31m maximum height to the northern edge of Block B seeks to ensure that the 'sky gap' along the edge of the Elizabeth Tower is preserved in Strategic View 27B..2</li> </ul>
Building Footprint	<ul style="list-style-type: none"> <li>• The footprint of Gassiot House may be extend / cantilever an additional 10m westward so long as it maintains the principal pedestrian route into the hospital within a colonnade or cantilever of generous height.</li> <li>• The footprint of Lambeth Wing and A&amp;E may be extended forward towards Lambeth Palace Road so long as it does not come any closer than 15m to the back edge of pavement.</li> </ul>
Residential Amenity	Development should not unacceptably harm the residential amenity of neighbours at County Hall South Block or Urbanest building.
Built Character	<p>The YRM palette of external materials should be closely matched in order maintain a unified Campus character and to respond positively to the local distinctiveness of this heritage sensitive part of central London.</p> <p>The detailed massing of each block should respond positively to its contact, ensuring parapet heights, form, spaces between buildings, and appearance relate coherently to the character of Lambeth Palace Road and Westminster Bridge Road.</p> <p>All rooftop plant should be effectively screened and not exceed the height of the building envelopes where it would be visible in sensitive views from outside the Campus.</p>

Urban greening	Urban greening / enhancement of should be optimised within the Campus and along its street frontages in particular.
Open space	The amenity value of open spaces within the campus, especially in terms of sunlight, should be maintained

## **APPENDIX 1 Views Assessment**

### View 1 –Strategic View 17A.2 Hungerford Bridge Upstream



View looks down the River Thames towards the Palace of Westminster. The river has a dominant role in the view's foreground and middle ground.

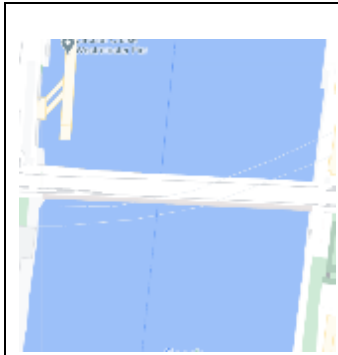
County Hall and St Thomas' Hospital to the left of the view are calm masses. The Vauxhall tall building cluster can be viewed in the distance. Westminster World Heritage Site is on extreme right side of the view.





The Indicative approach is not visible.

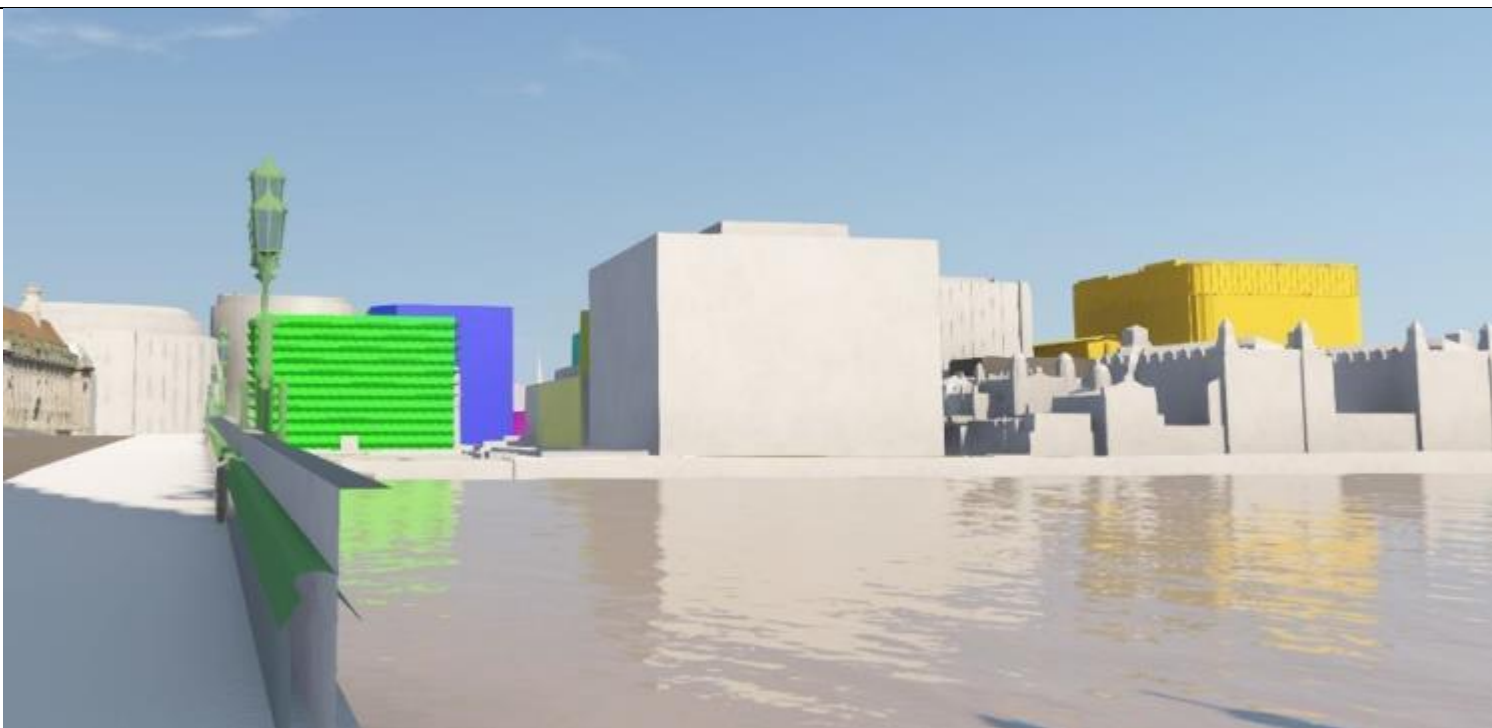
**View 2 –Strategic View 18A.3 Westminster Bridge upstream at Westminster Bank**



This view is from Westminster Bridge looking towards the St Thomas' Hospital campus 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 backdrop building.



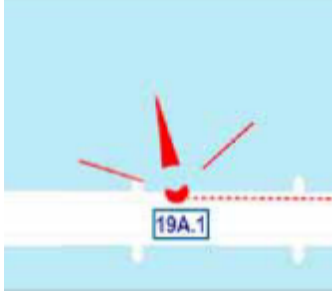



The Indicative Approach models sit comfortably within the context – allowing the North Wing of the Hospital to retain its compositional primacy. The height of Indicative Approach Block A (Gassiot House) aligns with the roofline of the Urbanest building in the backdrop. Indicative Approach Block B's upper floors are cut back so that they are largely concealed by the North Wing. The silhouette of the historic hospital buildings to the right remains unaltered.

Westminster World Heritage Site	Behind the viewer, off camera to the extreme right across the River Thames. No effect.
Lambeth Palace (grade I)	Off camera to the extreme right. No effect.
County Hall (grade II*)	Off camera to the left on the other side of Westminster Bridge Road.
Westminster Bridge (grade II)	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	Off camera to the left on the other side of Westminster Bridge. No impact.
Albert Embankment CA	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	Behind the viewer, off camera to the extreme right across the River Thames. No impact.
LVMF – This is London Plan View 18.A.3	<p>The LVMF 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 assessment above has concluded no adverse impacts on the key heritage assets. Therefore, the Indicative Approach is considered to comply with the LVMF guidance</p>

### View 3 –Strategic View 19A.1 Lambeth Bridge looking downstream



	<p>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.</p> <p>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.</p>
 <p>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.</p>	



<p>The Indicative approach Block A (Gassiot House) is completely screened by the Hospital campus. Indicative Approach Block B is largely screened by middle ground buildings but its upper floor (in yellow) can be seen peeking up between North Wing and East Wing.</p>	
Westminster World Heritage Site	<p>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.</p>
Lambeth Palace (grade I)	<p>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 virtue of their complementary character (towers and pinacles). 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>
County Hall (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>

Westminster Bridge (grade II)	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.
Victorian buildings of St Thomas' Hospital (South Wing and Block 9)	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.
Southbank Conservation Area	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 in 'Minor'. Therefore the Magnitude of Effect is 'Slight'. The setting of the Southbank CA is preserved.
Albert Embankment CA	The St Thomas' campus forms the largest character area of this CA. 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.
Westminster Abbey and Parliament Square CA	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.
LVMF – This is London Plan View 19.A	<p>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>Given the assessment conclusions above it is considered that the Indicative Approach meets the requirements of the LVMF.</p>

#### View 4 – Strategic View 20A.1 Victoria Embankment between Waterloo and Westminster Bridge Westminster Pier to County Hall

	<p>View is on Axis with the symmetrical façade of the landmark County Hall.</p> <p>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.</p>
 <p>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.</p>	



The indicative approach models are seen off the right of County Hall but does not exceed its roof ridge height due to perspective. The Elizabeth House approval is shown in yellow on the left side. It should be noted that Beckett House is identified as a location suitable for tall building development in Annex 10 of the Lambeth Local Plan (2021); and is the dark blue mass glimpsed beyond Indicative Approach Block A.



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’. 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.

Westminster Bridge (grade II)	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	<p>The LVMF 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 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.'</i></p> <p>Given the findings above it is considered that the Indicative Approach complies with the LVMF guidance.</p>

**View 5 – Strategic View 27B.1 - Palace of Westminster from north side of Parliament Sq.**

	<p>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.</p> <p>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.</p>
	
<p>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.</p>	



Only Indicative Approach Block A (green) is visible in this view. Block B is not visible. The Blue massing is Beckett House replacement on the Royal Street allocation. Block A (green) is lower than the existing backdrop building in the view (Urbanest) which sets the datum for development here. and its effect on the townscape backdrop will be negligible. The composition of the view is maintained, the primacy of the Elizabeth Tower and the full silhouette of the Palace of Westminster is respected.


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

	<p>development is not unduly dominant nor distracting and in that regard its overall contribution to setting is neutral.</p> <p>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.</p>
Palace of Westminster and Parliament Square Conservation Area	<p>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.</p> <p>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.</p>
Whitehall Conservation Area	<p>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.</p> <p>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.</p>
Strategic View - View 27B.1	<p>LVMF States:</p> <p><i>'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</i></p>

	<p><i>extremities of the Palace of Westminster nor detract from the appreciation of Westminster Abbey and St Margaret's Church.</i></p> <p><i>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.'</i></p> <p>The Indicative approach meets the guidance in the LVMF by allowing a full appreciation of the Elizabeth Tower.</p>
--	--

**View 6 - Strategic View 27B.2 – Parliament Square North Pavement looking east**

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

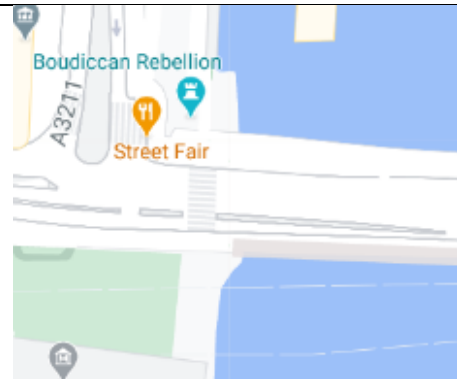


Only Indicative Approach Block A is visible in this view. Indicative approach B has been cut back from its Regulation 18 massing to no longer be visible in this view. The cutting back of this massing retains the vertical sky gap down the edge of the Elizabeth Tower. The Blue massing is Beckett House replacement on the Royal Street allocation.

Westminster World Heritage Site	<p>The retention of the sky gap means that the silhouette of the Elizabeth Tower remains unaltered.</p> <p>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.</p>
Palace of Westminster and Parliament Square Conservation Area	<p>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.</p> <p>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.</p>
Whitehall Conservation Area	<p>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.</p> <p>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.</p>
Strategic View - View 27B.2	<p>LVMF Guidance States:</p> <p><i>'Background</i>  <i>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</i></p>

	<p><i>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.</i></p> <p><i>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.'</i></p> <p>The Indicative approach meets the guidance in the LVMF by allowing a full appreciation of the Elizabeth Tower.</p>
--	--

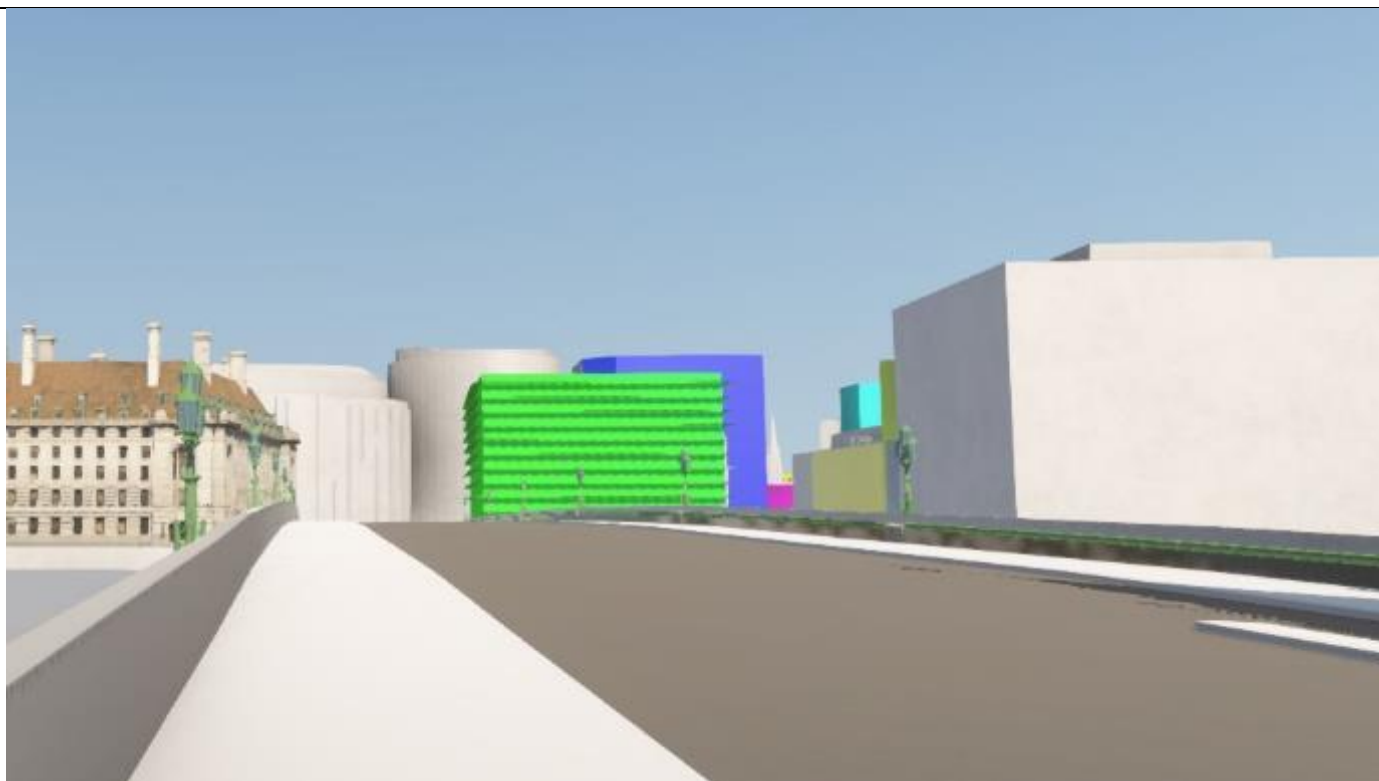
**View 7 Westminster Bridge (western end near Boudica statue) looking east**



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.



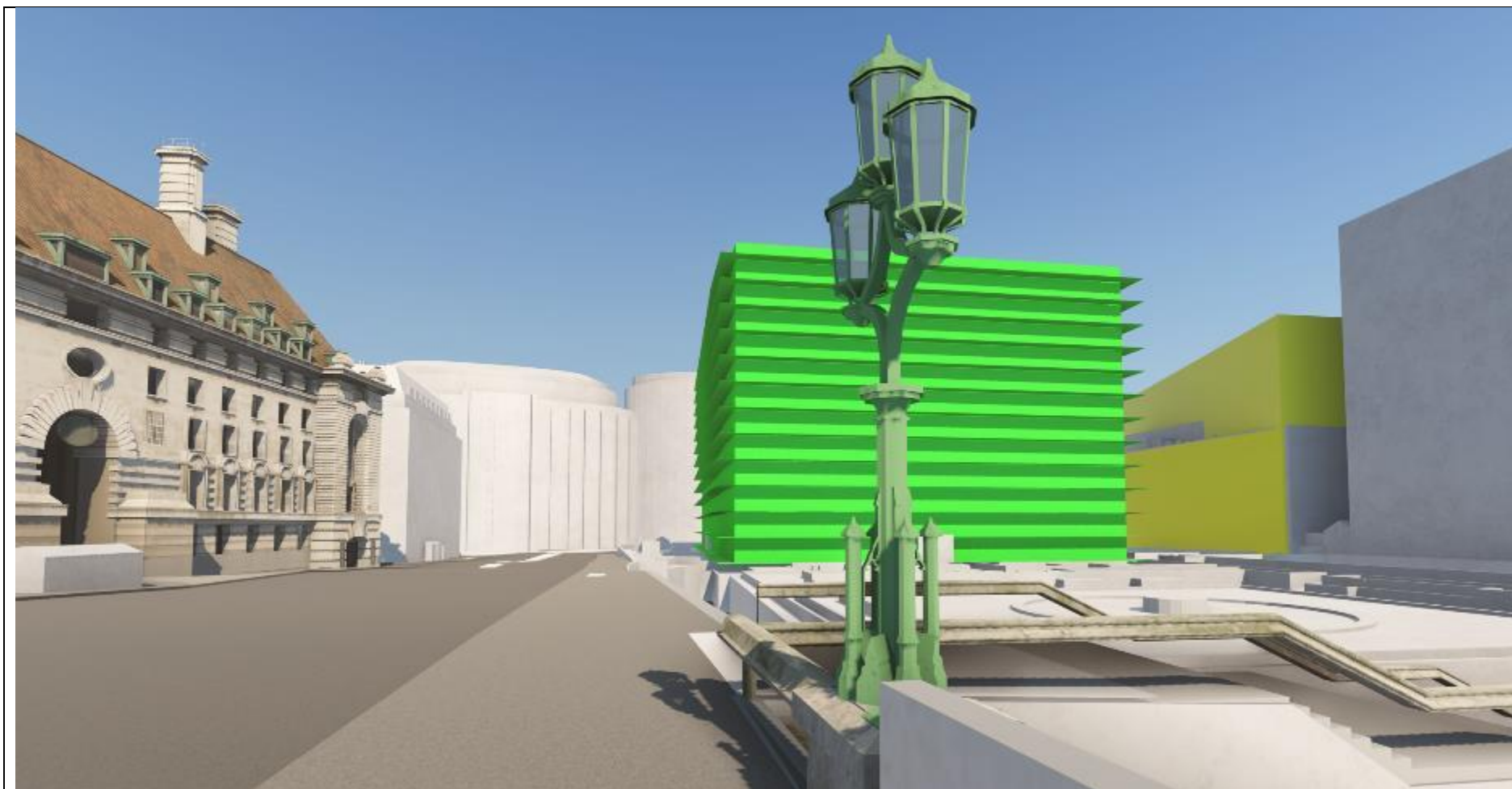


Annex 10 of the Lambeth Local Plan identifies Beckett House (dark blue) as a location appropriate for a tall building and identifies a general height which would be comparable with the Urbanest building to its left. Indicative Approach Block A stands in front of these buildings and appears lower. Indicative 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 it significance is 'minor' in this view. The magnitude of Impact is 'Slight'. The significance of the CA is preserved.

### View 8 - Westminster Bridge at Albert Embankment steps

	<p>This view location is within the South Bank Conservation Area opposite the Grade II * listed County Hall. County Hall North Wing can be seen beyond County Hall on the left.</p> <p>County Hall on left. Beyond is the locally listed County Hall South Wing. These and Park Plaza Hotel (dark glass) are within Southbank CA. Everything to right is Albert Embankment CA with the exception of the Urbanest building (black and white bands) which is not in a CA.</p>
	



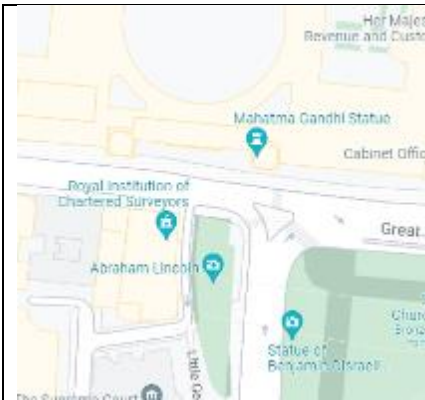
The increase in height created by Indicative Approach Block A creates a built form which improves the sense of enclosure to St Thomas' garden (something the current Gassiot House lacks) and a stronger sense of enclosure to Westminster Bridge Road

County Hall (grade II\*)

County Hall looks across Westminster Bridge Road to the large garden of St Thomas' Hospital. The Indicative Approach A is located diagonally opposite County Hall beyond the garden. County Hall 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.
Southbank CA	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 has a weak massing when compared County Hall South Block 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 not harmful change. No harm to the setting. Indeed, it could reasonably be argued that an increased mass on the site of Gassiot House would be beneficial in townscape terms and thus offer an enhancement to the setting of the CA.
County Hall South Block (NDHA)	This building's setting derives limited benefit from the St Thomas' Hospital beyond the pale and recessive character of the YRM buildings palette. The asset has medium value as a NDHA. Scale of change is 'Moderate'. The Magnitude of Effect is 'Medium'. There is change to the setting but not harmful change. No harm to the setting.

### View 9 - Great George St at junction with Little George Street



The view location is in Westminster. The viewer is looking towards Elizabeth Tower which can be appreciated clearly; it is a landmark. The Whitehall Conservation Area is on the left and the Palace of Westminster and Parliament Square Conservation Area is on the right. The Elizabeth tower is the dominant feature in this view and off camera to the right is the spacious greenery of Parliament Square and Westminster Abbey.

The Elizabeth Tower is a striking landmark. Visible development in the Lambeth backdrop is a modern. Urbanest is the tallest of the visible buildings and has a banded treatment which emphasises its width. To the rear left, the dark form is Park Plaza Hotel.





The Indicative Approach A sits well below the shoulder of Urbanest and will obscure a large part of the Urbanest building. The roof line of Approach A aligns with the shoulder height of the adjoining Park Plaza Hotel.

Westminster World Heritage Site	<p>Given the prominence and dominance of the Elizabeth Tower the visible Lambeth development is not unduly dominant nor distracting and in that regard its overall contribution to setting is neutral.</p> <p>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 will have a neutral effect on the setting of the WWHS.</p>
Palace of Westminster and Parliament Square Conservation Area	<p>Given the prominence and dominance of the Elizabeth Tower the visible Lambeth development is not unduly dominant nor distracting and in that regard its overall contribution to setting is neutral.</p> <p>The significance of the CA is 'high', the scale of change is 'minor' making the magnitude of effect 'Small' The Indicative approach layers the Lambeth townscape and will have a neutral effect on the setting of the setting.</p>
Whitehall Conservation Area	<p>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.</p> <p>The significance of the CA is 'high', the scale of change is 'minor' making the magnitude of effect 'Small'. The Indicative approach layers the Lambeth townscape and will have a neutral effect on the setting of the CA.</p>

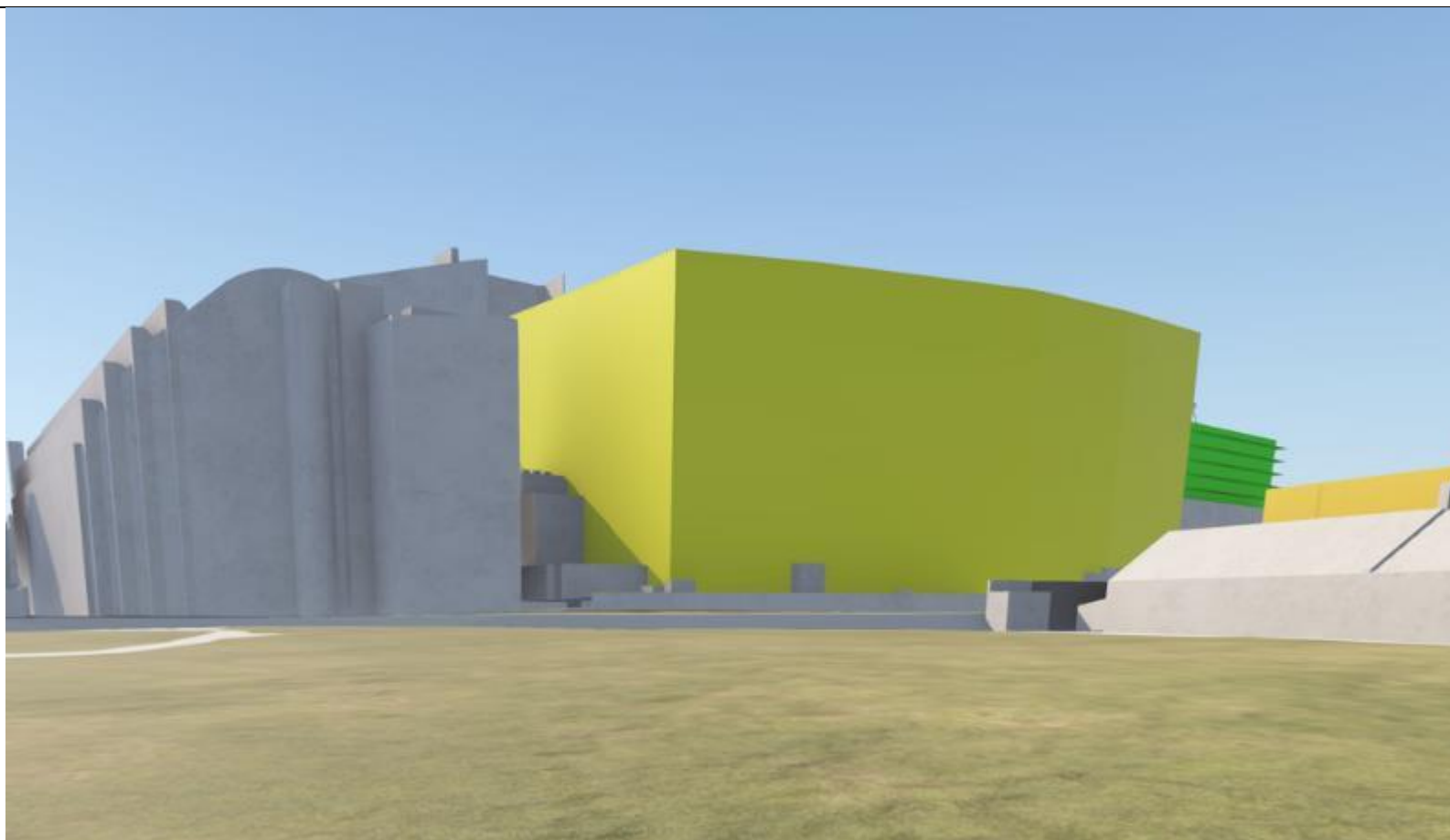
**View 10 – Archbishops Park (northwestern corner)**



This view location is within the Lambeth Palace Conservation Area. The viewer is looking towards the Albert Embankment Conservation Area. This winter view has bare trees which allows the viewer to see the Hospital campus buildings at their most visible.

Evelina Children's Hospital is centre left. East Wing is the dark mass at the right shoulder of the Evelina Hospital with the North Wing to its right. A&E and Lambeth Wing visible through the trees centre right. The former school building's roof can be glimpsed in the middle ground right.





The trees have been removed in the model for clarity. The Indicative approach Block B is visible to the right of the Evelina Hospital and is of comparable height to it. The Indicative Approach B brings a greater sense of enclosure to Lambeth Palace Road. Indicative Approach A can be glimpsed.

It should be remembered that the model mass is only indicative for testing purposes and does not represent a building; in this regard the perceived long façade should be ignored as such an effect can be addressed through design mitigation.

Albert Embankment CA

The adopted character appraisal does not identify views from Archbishop's Park into the Hospital campus as important. This is the least attractive side of the campus (the A&E building in particular).

	<p>The significance of the asset is high. The effect of change here to its 'Negligible'. The Magnitude of Impact is 'slight'. The screening from view of the dark mass of the East Wing and the replacement of A&amp;E block are beneficial to the character and appearance of the CA.</p>
Lambeth Palace Conservation Area	<p>The adopted character appraisal does not identify views from Archbishop's Park of Lambeth Palace Road into the YRM Hospital campus as important to the setting of this conservation area. Ordinarily the dense tree screening means that the visual relationship between the two is very limited.</p> <p>The significance of the asset is high. The effect of change on the setting is 'Negligible'. The Magnitude of Impact is 'slight'. The setting is reserved.</p>
Archbishop's Park (NDHA)	<p>Archbishop's Park has a positive relationship with Lambeth Palace garden to its west and with the historic properties on its southern and eastern perimeters. However, its setting benefits little from the context to the north and north-west as this is post-war development with no particular relationship with the historic landscape and there is significant tree screening.</p> <p>The significance of the asset is 'medium', the scale of change is 'minor' so the Magnitude of Impact is 'slight'. The setting of Archbishop's Park is preserved.</p>

## **Sources**

Albert Embankment Conservation Area Character Appraisal, 2017

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

Lambeth Local Plan, 2021

Lambeth Palace Conservation Area Character Appraisal, 2017

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

Southbank Conservation Area Conservation Area Statement, 2007

Waterloo Building Height Study, 2018

Westminster World Heritage Site Setting Study, 2018

Westminster Abbey and Parliament Square Conservation Area Audit, 2008

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

END OF DOCUMENT