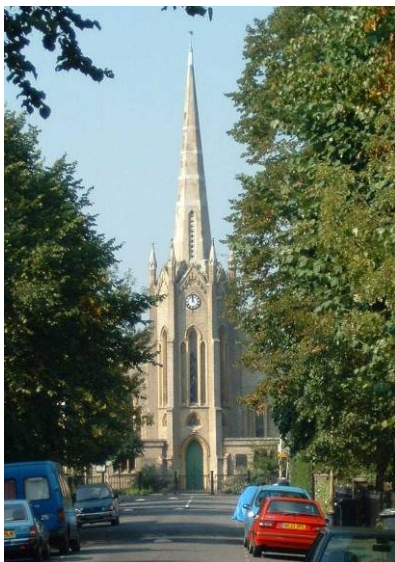


Lambeth Tall Building Study



**FINAL VERSION
AS AMENDED
SEPTEMBER 2014**

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This final version refines and develops the content of the 2012 Lambeth Tall Buildings Study as a result of representations made in relation to the to the draft Lambeth Local Plan (2013). In response to those submissions meetings were held with representatives from English Heritage in June and July 2014 and their further input / advice was provided during the examination in public period.

It was agreed that the Council would consider all the advice offered and make amendments / additions accordingly including re-visiting terminology, content, assessment and conclusions taking greater account of the advice set out in the document 'Guidance on Tall Buildings by CABI / EH, 2007' especially in relation to the terms 'appropriate for', 'sensitive to' and 'inappropriate for' tall building and include all strategic views.

August, 2014

1. Introduction

1.1 The Lambeth Tall Buildings Study (2012) was written to provide an evidence base in support of the Design Policy outlined within the emerging draft Local Plan. It should be noted that a detailed Brixton Tall Building Study (2012) has also been prepared for the same purpose and to inform the content of the draft Brixton Supplementary Planning Document (SPD).

1.2 This revised / amended version of the 2012 study examines the policy background applicable to tall buildings and contains an assessment of the borough in relation to tall buildings in order to test previous assumptions in order to inform emerging policy. The object is to identify areas within the borough that are 'appropriate', 'sensitive' or 'inappropriate' for tall development based on best-practice guidance from English Heritage / CABE. Given the borough-wide nature of the study exact locations for new large or tall buildings can not be identified. However, it is hoped that this document will be a useful general tool for anyone taking such proposals forward in future.

Study Area

1.3 The London Borough of Lambeth is one of 14 boroughs which make up Inner London. It measures seven miles north to south, and about two and a half miles east to west. It is one of the most densely populated inner London boroughs. Lambeth's population is forecast to grow by 12.9% in the next twenty years to 2028 (GLA 2007 Round population projections). To accommodate this growth residential densities will have to increase.

Study Methodology

1.4 The methodology adopted for this tall buildings study is consistent with the approach suggested by the EH/CABE Guidance on Tall Buildings (July 2007) in supporting a plan-led approach to the identification of areas that are 'appropriate for', 'sensitive to' and 'inappropriate for' tall or large buildings. Whilst that guidance might suggest that a map-based form is used, it has been decided, following survey, that the limitations of mapping would not make it an effective tool in this instance:

1.5 Firstly, the London Plan definition of a large or tall building is dependent on the context of the proposal—a six storey building may not be considered large in some locations but may be in others.

1.6 Secondly, it is not possible to define on a map the settings of open spaces or heritage assets—the assessment of whether a large or tall buildings has a impact on the setting of a heritage asset will be dependent on the siting and height of a specific proposal.

1.7 That said, map-based output has been provided by buildings upon detailed analysis set out in the Waterloo and Vauxhall SPD documents. This study builds on that analysis. This is particularly relevant for the Vauxhall area; see page 28.

1.8 As an alternative to mapping the conclusions of this study have been presented in tabular form on page 50 and which will be produced as an annex within the Lambeth Local Plan.

2. Policy Background

National Planning Policy Framework (2012)

2.1 The National Planning Policy Framework (NPPF) establishes that that local plans should set out opportunities for development and clear policies on what will, or will not, be permitted and where (paragraph 154). Furthermore, it states that Local Planning Authorities should set out their strategic priorities for the area, which should also include policies to deliver conservation and enhancement of the natural and historic environment, including landscaping (paragraph 156) and identify land where development would be inappropriate due to environmental or historical significance.

The London Plan (2011)

2.2 In accordance with the London Plan, Policy 7.7a, tall and large buildings should be part of a strategic approach to changing or developing an area, and should not have an unacceptably harmful impact on their surroundings. As tall buildings may be visible across local and wider views of London forming part of the skyline, it is essential that good design and sustainability be a key factor. They should be generally limited to Central Activity Zones, Opportunity areas, Areas of intensification and town centres that have good access to public transport. Design considerations include context, with an emphasis on siting tall buildings at points of significance within the city.

Lambeth Core Strategy (2010)

2.3 The areas of Waterloo, Vauxhall are identified as Opportunity Areas (see map on following page). The evidence to justify the location of tall buildings in these areas was summarised in Topic Paper 3 (Core Strategy Policy S9, page 57). Brixton is identified as a town centre where tall building development is considered appropriate.

Lambeth Unitary Development Plan, 2007 (Saved Policies 2010)

2.4 The Council identifies tall buildings as those over 25 metres adjacent to the River Thames and over 30 metres elsewhere within the borough. This is the threshold over which planning applications will be referred to the Mayor for his views and over which he has a power of direction of approval or refusal.

2.5 Policy 40 sets out visual design criteria and urban design criteria for tall building development where siting meets the siting criteria identified. See excerpt on following page.

Discussion

2.6 The Council, in the Core Strategy, has identified tall buildings as part of as those over 25m adjacent to the River Thames and over 30m elsewhere within the borough which is the threshold set for referrals to the Mayor in the London Plan. However, the London Plan also defines a tall, and large, buildings as those that are:

‘substantially taller than their surroundings, cause a significant change in the skyline or are larger than the threshold set for the referral of planning applications to the Mayor’.

2.7 This impact-led definition offers the best way of taking a borough-wide assessment forward and requires an understanding of the local context as a starting point.

Extract from Policy 40 of the Lambeth UDP

Visual Design Criteria:

If the locational criteria are met, then the tall building will need to meet the following visual design criteria:

In view of the inevitable prominence of a tall building it should be of the highest architectural and

It should enhance the skyline through profile and use of materials.

Bulky, solid structures or buildings with unsightly roof plant will not be permitted.

Be constructed to the standard of quality, design, and vision of the original architect.

Urban Design:

Tall buildings should create pedestrian friendly spaces, a suitable high quality public realm, improving the sense of place and identity, and address streets (and potentially the river) with active ground floor uses. The Council will also have regard to the following

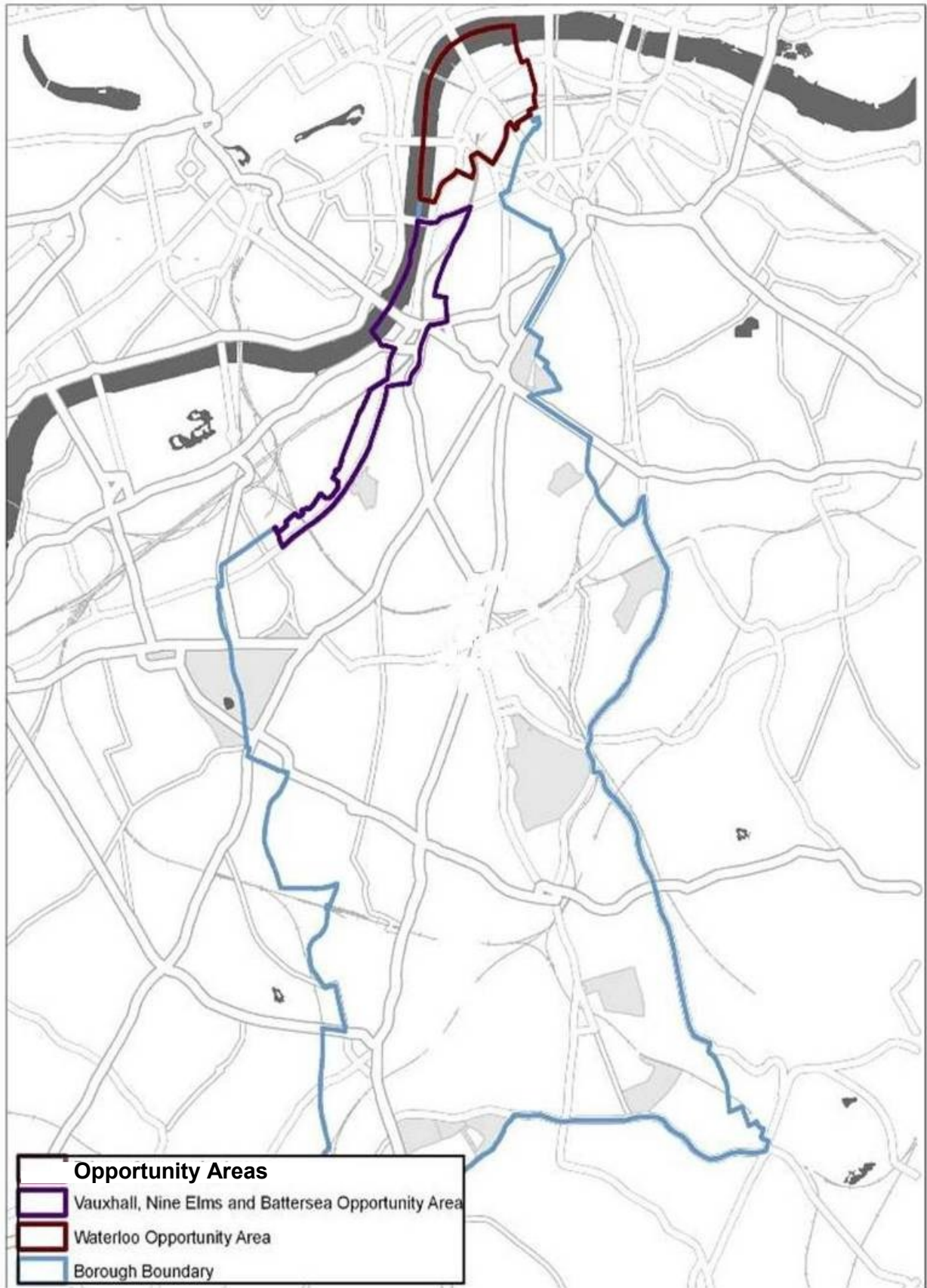
The development should interact with, and contribute to its surroundings at street level.

Development should provide a proper setting and treatment, including the provision of mixed uses, active frontage uses where appropriate, considerable improvements to the public realm, and landscaped open space,

The building should achieve a harmonious relationship when viewed in context with surrounding buildings at street level and as part of the public realm.

The development should have access, servicing, and entrances that do not detract from their surroundings;

The amenities and development possibilities of surrounding sites and buildings should not be impaired. Where this cannot be demonstrated, the proposal should be part of, or accompanied by, a wider masterplan or development framework.



3. Existing Large and Tall Buildings in Lambeth

3.1 Up until the 1950s Lambeth had a relatively low skyline punctuated by chimney stacks, church towers and the occasional dome or turret. Within Lambeth generally the average building height is still low—around 10m (4 storeys). However, it should be noted that this is an average—whilst many properties are 2 storeys it is not uncommon for residential apartment blocks etc. to be in the region of 6 storeys. There are numerous tall buildings dotted around Lambeth (largely to the north of the South Circular road) and largely dating from the 1950s—1960s. In recent years tall building has begun again in London.

3.2 Using the Lambeth UDP policy threshold of 25m building height as a definition of a tall building the map opposite shows buildings at or above that height in dark purple. It shows a peppering of tall buildings across the north of the borough generally lessening in number as you proceed south as well as:

- A A concentration of 25m + buildings along the River Thames at Vauxhall, Albert Embankment and South bank / Waterloo.
- B A notable cluster of 25m + buildings at King's College Hospital, Denmark Hill.
- C A cluster of 25m + buildings at Brixton town centre.
- D Large buildings dotted along Streatham High Road (mostly inter-war apartment blocks).

The buildings that fall into the large and tall category can be grouped by type:

Point Blocks

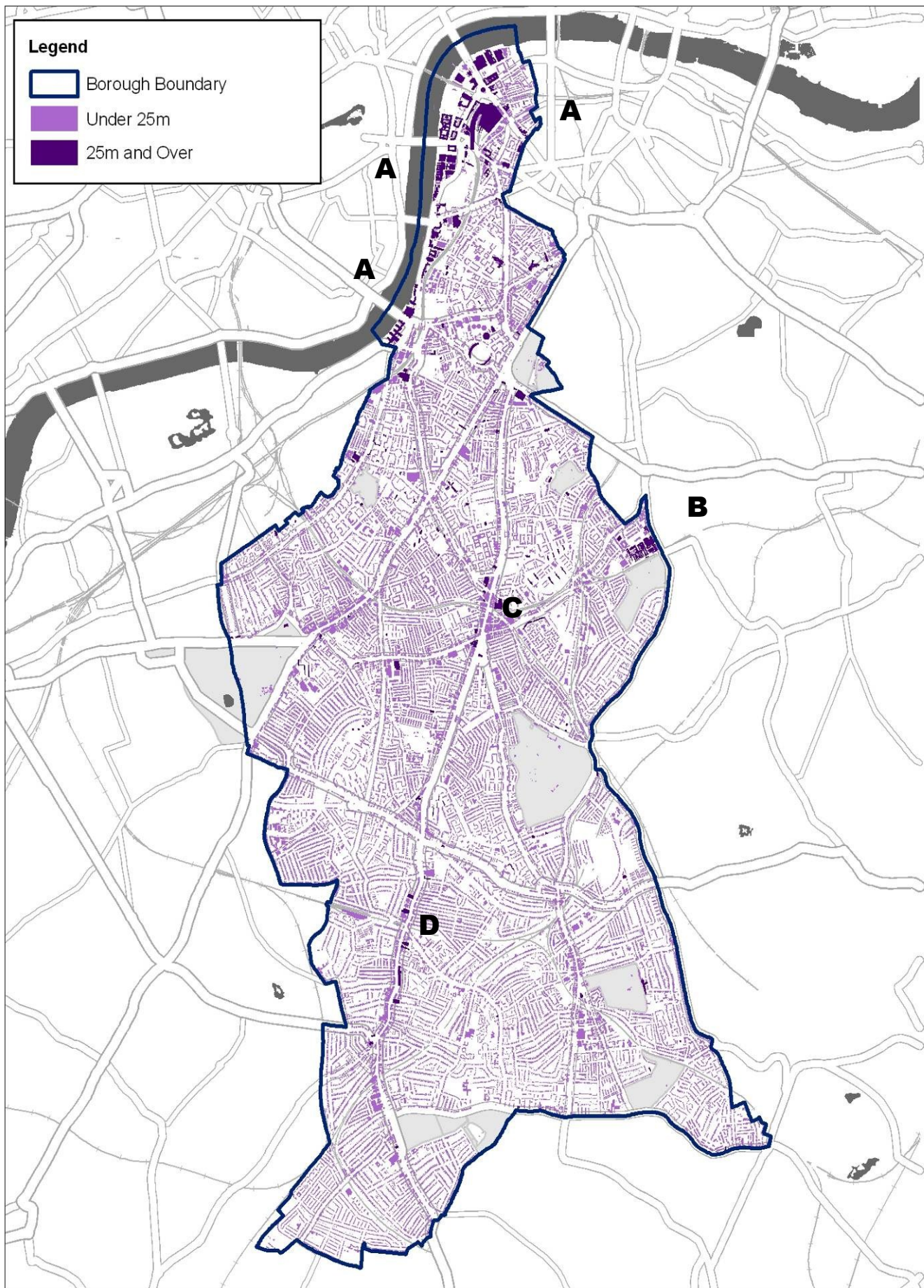
3.3 These are perhaps the most common form of tall building in Lambeth— fitting the classic tall building stereotype. They generally have a small foot-print and are thus vertical in form. The footprint size, height and treatment are determinants on their visual effect. Gracefulness is normally a combination foot-print and height. There are numerous examples of these in Lambeth; the majority being residential blocks erected as public housing in the 1960s and 1970s. Normally part of a comprehensive re-development they are often part of a designed estate which includes landscaping and amenity space.

3.4 The Shell Centre Tower, Belvedere Road is a successful example at Waterloo. Its monumental form and Portland Stone cladding allows the building to fit in well with the established landmark buildings in its River Thames context (on both sides of the river. Its siting on the edge of Jubilee Gardens gives it a very public presence.

3.5 Stangate House, Lambeth Palace Rd and the two towers on the Ashmole Estate (Bannerman House and Sirinham House), Vauxhall are very well designed examples of early post-war period. Both use locally distinctive materials and high quality detailing. White concrete (resembling Portland Stone) is used as a framing device and stock brick used as cladding material.

3.6 The tower blocks erected by Lambeth Council in the mid-late 1960s are an interesting and highly unique group of tall buildings that warrant greater understanding. Lambeth Towers, Kennington Road / Lambeth Road (George Finch, 1964-5) is a block of interlocking dwellings rising 11 storeys; it contained a doctors surgery, old peoples housing, shops and post office when it first opened. It's a striking composition in a conspicuous location and it still divides opinion today.

3.7 Lambeth's borough architects developed a towers design using a large panel system. Edrich House, Holland Rise House, South Island Place, Ebenezer House, Fairford House and Hurley House on Cotton Gardens Estate are all this type. The type is rectilinear in plan, in exposed aggregate concrete— boldly articulated with a strong silhouette.



3.8 A pentagon plan tower was also developed—again with a concrete finish, picturesque rooflines and strongly articulated elevations, it has landscape of concrete, granite setts and soft landscaping which is particularly high quality. Examples were built across the borough—Northwood House, Hamilton Rd, Bedford House, Solon New Rd, Bloomsbury House, Belgravia House and Barnsbury House, Clarence Avenue, Herne Hill House and Park View House, Dulwich Rd. The 1960s Dulwich Estate towers at Farquhar Rd, Upper Norwood (just outside the borough boundary) show that high density can be accommodated comfortably in suburban locations with spacious, quality soft landscaping.

3.9 It is worth noting that the Council built post-war towers tend not to be located in town centres of busy urban areas. The approach appears to have been one of dispersal around the borough in ones, twos and threes. Most are on modestly sized urban sites—often in quiet, low density residential areas rather than on main roads or within busy town centres.

3.10 There have, in recent years, been a number of tall buildings approved in Lambeth. In line with current thinking from the Mayor of London these have tended to be in city centre locations within the Waterloo and Vauxhall Opportunity Areas. The approach here is of clusters within fairly tightly drawn areas. This is in marked contrast to the post-war dispersal approach. This topic area might benefit from a more detailed understanding of the pros and cons of both approaches based on Lambeth case studies. This is not yet possible as only The Tower, St George Wharf has been completed. However, new towers in Southwark and the City of London are also visible from Lambeth, adding to the already rich and varied skyline. Tall buildings are thus, certainly at the north, a common feature.

Slab Blocks

3.11 These are perhaps best described as ‘ground scrapers’. The footprint tends to be large and the massing horizontal rather than vertical. The most noteworthy example is the Loughbrough Estate—the large white slab blocks stand regimented in a generous landscaped setting. Their massing and detailing is particularly successful. Again, their success is reliant on generous open space provision and mature planting. Southwyck House (AKA Brixton Barrier Block) is another well-known example—it was built to screen the low-rise Moorlands Estate from an urban motorway that was not subsequently built. Camelford House and Tintagel House, Albert Embankment are impressive post-war office slab blocks—well massed and carefully detailed in brick and stone.

Other Built forms

3.12 These are scattered across the borough. In places the skyline is punctuated by church towers, water towers and 19th Century commercial premises with domes or turrets. Large buildings include County Hall, Royal Festival Hall, National Theatre, The Oval Cricket Ground, Kennington Gasholders, Waterloo Station. St Thomas’ and King’s College Hospitals and some of the larger inter-war apartment blocks on Streatham High Road also fall into this category. In recent years the largest structure of interest is the London Eye which has established itself as something of an iconic city landmark.

The existing stock of Tall and Large Buildings

3.13 The refurbishment and over-cladding of existing large and tall buildings is something that we have seen in recent years and that is likely to continue. This is often necessitated by changes of use of use or the desire to improve thermal performance; or both. Success has been mixed. Some refurbished towers appear particularly poor—Birrell House, Stockwell. On the other extreme, perspective House, Westminster Bridge Road (an over-clad of a 1960s block) has resulted in a bulky and overly dominant rooftop form which adds little to the roofscape of the city and competes with the historic dome of the Imperial War Museum.

3.14 On the Ethelred Estate a brilliant white finish and purple highlighting has perhaps drawn too much attention to what had been previously understated grey blocks (Ward Point and Brittany Point, Lollard Street). On the Ashmole Estate Sirinham House has been



Shell Tower



Stangate House



Ashmole Estate



Binfield Road



Fenwick Estate



Cotton Gardens Estate



Solon New Rd



Clarence Avenue



Dulwich Road



Lambeth Tower



Birrell House



Rundell Tower



Southwyck House, Brixton



Loughborough Estate



Camelford House and Tintagel House,
Albert Embankment

over-clad in a manner that faithfully mimics the original design intent—to very good effect. All over-cladding should be informed by with an appreciation of the merits of the existing building and its impact on the wider context. Positive outcomes should be sought.

3.15 Redevelopment opportunities for sites with tall buildings should examine carefully the positive and negative attributes of the existing buildings. The opportunity should be taken to not repeat past mistakes—some tall and large buildings do not sit well in their contexts.

3.16 An example of problematic buildings can be seen at Herne Hill where the Lambeth Local Views Study, 2012 identified the close proximity of slab blocks and point blocks as problematic because they restrict views out towards the city from Brockwell Park (an open space, designated landscape and conservation area) and harm its open setting. Northwood House, Hamilton Road has a similar impact on the panoramic view from Norwood Park.



Meath House (slab block) and Park View House and Herne Hill House (point blocks) from Brockwell Park

3.17 Right is an example of the setting of a heritage asset harmed by the close proximity of a tall / large development can be found at Wandsworth Road, Vauxhall.

Here the close proximity and overly dominant form and scale of the St George Wharf development overwhelms the modest Grade II* listed Brunswick House; substantially harming its setting.



Conclusion

3.18 Existing large and tall building development is relatively common in Lambeth but generally clustered in the north of the borough (north of the South Circular road). There is a combination of stand-alone blocks and clusters. Architectural quality varies. Over-cladding and refurbishment require careful consideration to ensure ongoing good quality outcomes. Lambeth's 1960s siting approaches for residential towers (dispersal in residential areas) does not align with current town centre clustering models.

3.19 Whilst clustering of new towers with existing towers may be an option in some places the presence of development 25m+ can not in itself be used solely to justify new tall development—the appropriateness, or otherwise of the existing large tall building should be the starting point.



The Tower, Vauxhall
from St Mark's CA



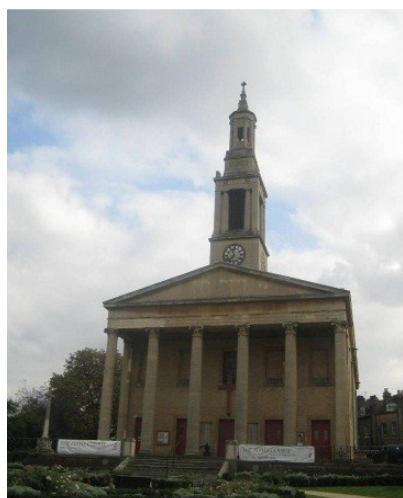
Eileen Tower and Strata (Southwark) from Renfrew Rd CA



The Shard and Strata
from St Mark's CA



Holland Rise House from Stockwell Park CA



St Luke, Norwood



Toplin House, Ferndale Rd



Perspective building
and Imperial War Museum

Design Considerations for Large and Tall Buildings

3.20 There has been much debate in 2014 about tall buildings across the city and their impact on its appearance and how we live. Experience gained from assessing the existing stock of tall buildings, previous applications and approved schemes has assisted in the identification of these key considerations below:

Building Form

3.21 Given the greater visibility of tall building development in relation to other low-rise forms the proportions of the building requires careful consideration. Too slender and the composition can look weak. Too broad and the slab-like character can appear overly dominant. Too short and the building can look unacceptably squat; International House, Brixton (see page 30) falls into this category. Many historical examples and some of the most noteworthy modern tall buildings in the city benefit from good silhouettes (such as The Gherkin, The Shard and Strata); this is worth considering in future proposals. Tapering or diminishing roof forms are generally more interesting than flat tops.

Appearance

3.22 Architectural treatment can help emphasis or play down both breadth and verticality. The choice of materials can do much to relate the building to its city-wide or local context. On Albert Embankment the tall buildings currently being implemented (Corniche tower and Merrano tower) share similar forms a pale Portland stone palette to give them group unity and respond well to this part of the city. A similar approach has been taken at Waterloo with the Shell Centre redevelopment whilst at Vauxhall the lower buildings approved on the periphery of the cluster along South Lambeth Road exhibit a brick and terracotta palette to respond to their sensitive conservation area contexts. The approved Vauxhall Square Scheme and recently approved Bondway Tower, Vauxhall use different materials on separate elements / buildings to respond to different contexts—brick at low level reinforces Vauxhall's character along the railway viaducts whilst stone and glass at high level is a response to the wider city beyond.

Clusters or Solo Towers?

3.23 There are merits to both approaches although the former is considered most appropriate in Vauxhall and Waterloo. Clustering requires great thought on the form and nature of the cluster itself. It also requires careful consideration to matters of proximity, orientation and outlook to avoid harm. With a cluster consideration needs to be given to the appearance of the architectural treatment of the buildings when considered as a group in close and distant views.

Quality of Life Issues

3.24 Whilst much recent public debate around tall buildings in the city has been about their visual impact the quality of life or their occupants and neighbours is a very important consideration. Daylight, outlook / orientation, air quality, noise, micro climate and other similar issues need careful consideration. The presence of very busy roads and railway viaducts in Lambeth is an important matter when considering the uses in lower floors of new development; residential accommodation, especially single-aspect flats, may not be acceptable.

Amenity Space

3.25 The most successful of Lambeth's 1960s residential towers are those that benefit from generous communal landscaped grounds. For example at Clarence Avenue on the Cotton Gardens Estate and Fenwick Estate spacious lawns and mature trees provide pleasant amenity space for residents. In dense urban locations such a response is not possible. Here roof-top gardens, private winter gardens, communal winter gardens and community leisure / games rooms provide beneficial accommodation for residents.



Keybridge House approval



Vauxhall Square approval.



Shell Centre approval



14 Soft landscaped grounds—Clarence Avenue, Cotton Gardens Estate and Fenwick Estate

4. Analysis

Introduction

A topic based analysis of the borough's characteristics has been undertaken to inform this study. This has necessitated the identification of relevant information layers which would inform a reasoned approach to tall buildings. These layers are identified as areas of either 'opportunity' layers or 'constraint' layers in order to ensure a balanced and rounded approach to the topic. The 'layers' or typologies which were identified to inform the analysis are:

- Topography
- Open Space
- Local character
- Strategic Views
- Local Views
- Transport Infrastructure (National Rail and London Underground)
- Major Town Centres
- Opportunity Areas
- Heritage Assets
- Westminster World Heritage Site
- Listed Buildings (and Local Listed Buildings)
- Conservation Areas
- Historic Landscapes

This section looks at each of these topic layers individually, identifying the issues and offering conclusions in relation to large and tall building development.

Topography

4.1 The general topography of the borough- see map opposite - can be characterised as land rising from low levels adjacent to the river in the north of the borough (A) reaching high points to the east at Herne Hill /Denmark Hill (B) and to the south east at Central Hill, Gipsy Hill, Streatham Common and West Norwood (C). The ground rises more gradually in the western side of the borough (D).

4.2 Topography can be both a constraint and an opportunity when considering the potential location for tall or large development. The only existing grouping of large buildings in an elevated position is King's College Hospital, Denmark Hill (red dot) and these have very limited wider impact, even on the adjoining London Borough of Southwark because of the nature of the adjoining streets and built forms. The positioning of tall buildings on high ground has the potential to increase their visibility across greater distances. Positioning tall buildings on elevated locations can also increase the potential for cross boundary impacts with Borough of Southwark to the east and Croydon to the south.

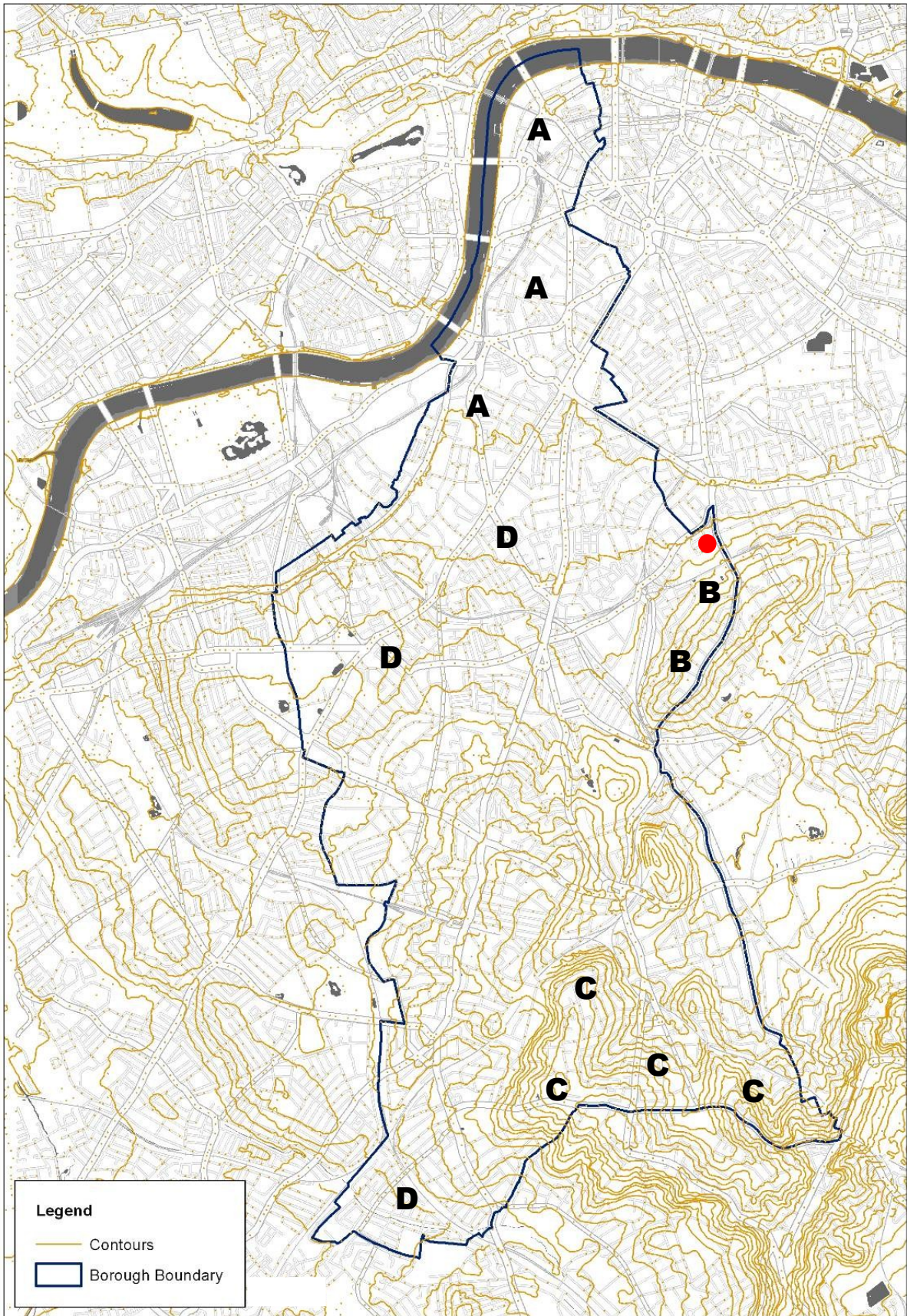
4.3 The generally flat topography and open character of the river corridor in the north of the borough also increases the potential visual impact of tall or large development. In combination with the greater concentration of designated heritage assets in the north of the borough and across the river in the adjacent local authority of the City of Westminster this area can be characterised as sensitive to tall buildings.

4.4 For those areas indicated as sensitive, further detailed urban design analysis will be required in advance of applications for tall buildings to establish whether they are appropriate in principle.

Conclusion

4.5 The flat area to the north of the borough (A), especially along the River Thames is generally considered sensitive to tall building development. The undistinguished topography to the west of the borough (D) is considered sensitive to tall building development.

4.6 The elevated locations (B and C) should be considered, in very general terms to be inappropriate for tall building development because of the potential high visibility due to the elevated topography.



Open Space

4.7 The map opposite identifies Lambeth's open spaces. These are exceptionally valuable as amenity spaces for residents and as ecological habitats. It should be noted that parts of the borough has an open space deficiency—placing great pressure on existing spaces and making them particularly vulnerable to further pressure from intensification.

4.8 Open spaces vary greatly in character and size. They range from gap sites and pocket parks through to churchyards and Georgian Squares, public parks, playing fields, and expanses of common land. Some are formal, others informal, some wild and others manicured. Their character and value is often more than their shape and content but is strongly influenced by the character of development around them.

4.9 Some of Lambeth's open spaces are contributory places within conservation areas. These include Clapham Common, Jubilee Gardens, Rush Common, Streatham Common and Vauxhall Park. The preservation or enhancement of their character and appearance is therefore a material planning consideration.

4.10 A number of Lambeth's open spaces are on the national Register of Historic Parks and Gardens (see later). The emerging local plan also identifies some spaces of purely local interest.

4.11 In some places tall buildings are present within the setting of these spaces. Existing examples identify the pros and cons of tall building development in such locations. One of the amenity values of these spaces is their openness and the opportunity for residents to enjoy space, sunshine and fresh air away from the distractions of urban life. Large and tall development around the perimeter of open spaces can be visually obtrusive, cause overshadowing and limit outlook. The greater the number of tall buildings / the greater the density of development the worse the impact.

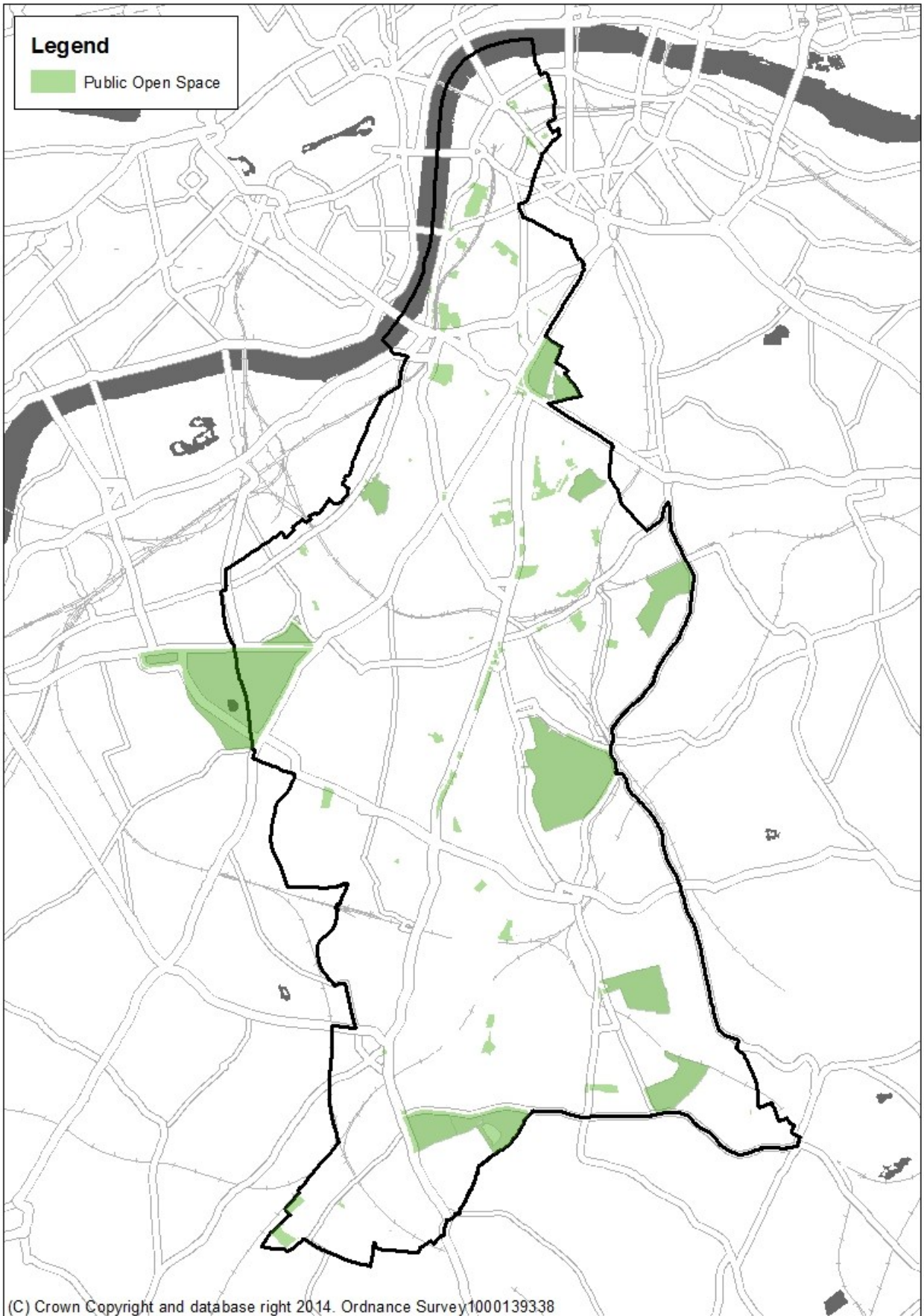
4.12 Right is an example of a tall building having an adverse impact on an open space is the Euro Tower's impact on Larkhall Park. The development around the perimeter of the park is generally low-rise. A combination of the general low-rise character, the sheer expanse of Larkhall Park, the form and siting of the Euro Tower by the edge of the park makes the building look particularly alien and monolithic.



Conclusion

4.13 Tall buildings are not characteristic of Lambeth's open spaces and large or tall development within open spaces is considered inappropriate.

4.14 The settings of open spaces are considered to be 'sensitive' to large or tall building development. It is difficult to elaborate further due to the varying character and contexts of the individual landscapes. However, it is likely that development in the immediate setting that is visually obtrusive, causes significant overshadowing or unacceptably restricts the outlook from open space will generally be considered inappropriate.



Local Character

4.15 Lambeth's built environment is largely a product of a century of growth from the early 19th century onwards. The northern part of the borough, being closest to central London, tends to be the oldest and the latest phases of development tend to lie in the south. However, subsequent redevelopment in the post-war decades has changed this to a certain degree.

4.16 Conservation areas cover about 1/3 of the borough. The Council has character appraisals for about 20 of these (See Appendix 4) and a full photographic record of each of them. This has informed the Council's understanding of this topic along with the Lambeth Local Distinctiveness Study, 2012. It identifies three basic character types for Lambeth:

A. City Centre

4.17 The South Bank, Waterloo, Albert Embankment and Vauxhall riverside areas very much exhibit central London characteristics in terms of building densities, building forms and general character. Much of this dates from the 20th Century and includes various large and tall buildings. Sites are normally constrained and large and tall buildings (normally commercial) typically rise out of the conventional street scene with out piazzas or public spaces. This often means that they have little impact in their immediate urban context—the greatest impact being in distant views. Examples include The Union Jack Club, Waterloo Road and Elizabeth House, York Road.

B. Urban

4.18 The northern half of the borough (north of Brixton) is generally characterised by the first phase of 19th century development (1800—1850). The character is generally that of urban streets and squares of terraced and other tightly packed development often only with small gardens. Building heights for these properties tend to be in the region of three and four storeys. Most large or tall buildings in this part of the borough are post-war residential blocks built as part of comprehensively designed housing estates where mixtures of house types, community facilities and open spaces were provided as a planned development.

C. Suburban

4.19 The Southern half of the borough (south of Brixton) is generally characterised by development from the latter part of the 19th Century and into the early 20th Century. Residential in character the properties tend to have more generous gardens than the northern part of the borough, buildings heights are general two to three storeys. The character is leafy and much quieter than the other character areas. There is a greater sense of openness. There are generally very few tall buildings in suburban areas. Where large buildings existing in suburban areas they tend to be post-war housing blocks in open landscaped settings (such as Barnsbury House, Belgravia House and Bloomsbury House, Clarence Avenue) or inter-war apartment blocks such as those lining Streatham High Road.

Conclusion

4.20 It is highly unlikely that future comprehensive schemes for redeveloping existing urban and suburban areas will come forward. Ad-hoc development on wind-fall sites is the most likely way development sites will come forward. The suburban areas to the south of the Borough (south of Brixton), being lower density, furthest from central London and quieter are considered inappropriate for new tall building development. Whilst the urban and city centre areas are of mixed character (often with existing large and tall buildings) they have the greatest concentrations of heritage assets / views, and other constraints which make them generally sensitive to tall building development (see later).



City Centre



Urban



Suburban

Strategic Views

4.21 The Mayor of London's Strategic Views are embedded in the London Plan and set out in detail in the London View Management Framework. Five of the Mayor's 'Protected Vista' strategic views affect Lambeth. These views are geometrically defined and include a height threshold which restricts development. They are:

- A. View 9A.1 King Henry's VIII's Mound to St Paul's Cathedral
- B. View 2A.2 Parliament Hill summit to Palace of Westminster
- C. View 2B.1 Parliament Hill E of Summit to Palace of Westminster
- D. View 4.2 Primrose Hill to Palace of Westminster
- E. View 8A.1 Westminster Pier to St Paul's Cathedral.

The map opposite shows the extent of their view corridors.

4.22 Views A and E—the view cones are narrow and just clip the north-most part of the borough. The nature of these views means that no tall building development will be possible within the view corridors without harming the view of St Paul's Cathedral.

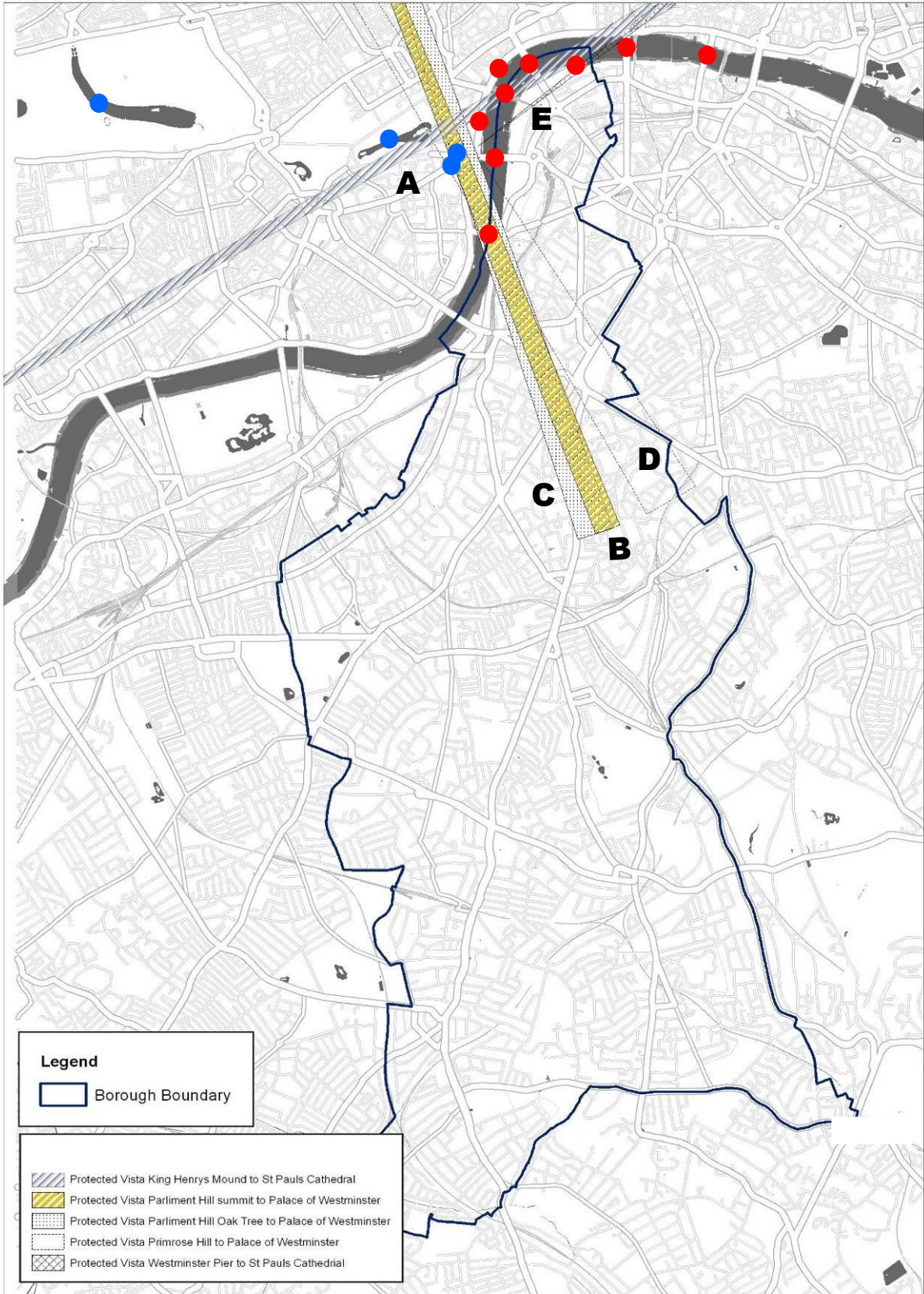
4.23 In views C, B and D the issues for Lambeth relate to the appearance of development in the backdrop of the views. Here, where silhouette and clear sky are considered important, places a constraint on building heights. As it can be seen from the map these view corridors extend some distance into Lambeth and have implications for tall building development on Albert Embankment. This matter is addressed in the Vauxhall OAPF and the Vauxhall SPD.

4.24 A range of River Prospect Views also affect Lambeth—12 (Southwark Bridge), 14 (Blackfriars Bridge), 15 (Waterloo Bridge), 16B (Gabriel's Wharf), 17 (Golden Jubilee Footbridges), 18 (Westminster Bridge), 19 (Lambeth Bridge); and 20 (Victoria Embankment). These are marked by red dots on the map opposite. A number of townscape views also affect Lambeth—23 (Bridge over Serpentine), 26A (St James's Park Bridge), 27A (Parliament Square SW), 27B (Parliament Square N —includes a protected silhouette). These are marked by blue dots on the map.

4.25 In the majority of the river prospect and townscape views the Mayor supports new development subject to guidance in LVMF; there is no 'in principle' objection to tall buildings appearing in these views although the high concentration of heritage assets in this area presents great sensitivities. The only exception are 27A and 27B where the protected silhouette places a height restriction on back-drop development behind the Palace of Westminster. It should be noted that there is directive advice within the LVMF on how to consider development in each of the designated views discussed above.

Conclusion

4.26 Strategic 'protected vista' view cones (A, B, C D & E) affecting Lambeth are considered 'inappropriate' locations for tall buildings. The other strategic views, containing as they do numerous heritage assets, are 'sensitive to' tall building development with the exception of the backdrop of the Palace of Westminster in View 27 (A&B) which is considered inappropriate for tall building development.



Local Views

4.27 Policy 41 of the Lambeth Unitary Development Plan (Saved Policies 2010) identifies a number of views of local significance. Further evidence-base work on locally significant views has produced additional views of importance for the draft Local Plan (see Lambeth Local Views Study, 2012). Their view cones shown on the map.

4.28 There are two types of local views—Panoramas and Landmark Silhouettes:

A Panoramas

4.29 The objective of these views is to ensure that no foreground or mid-ground development harms an appreciation of the panoramic nature of the view and landmark buildings within it. Ten Landmark Silhouette views are proposed in the draft local plan.

4.30 Two aspects are worth considering with regard local views and tall buildings. Firstly, the nature of the view and the features within it. Secondly, the presence of existing tall buildings in the view and whether their contribution is positive, negative or neutral.

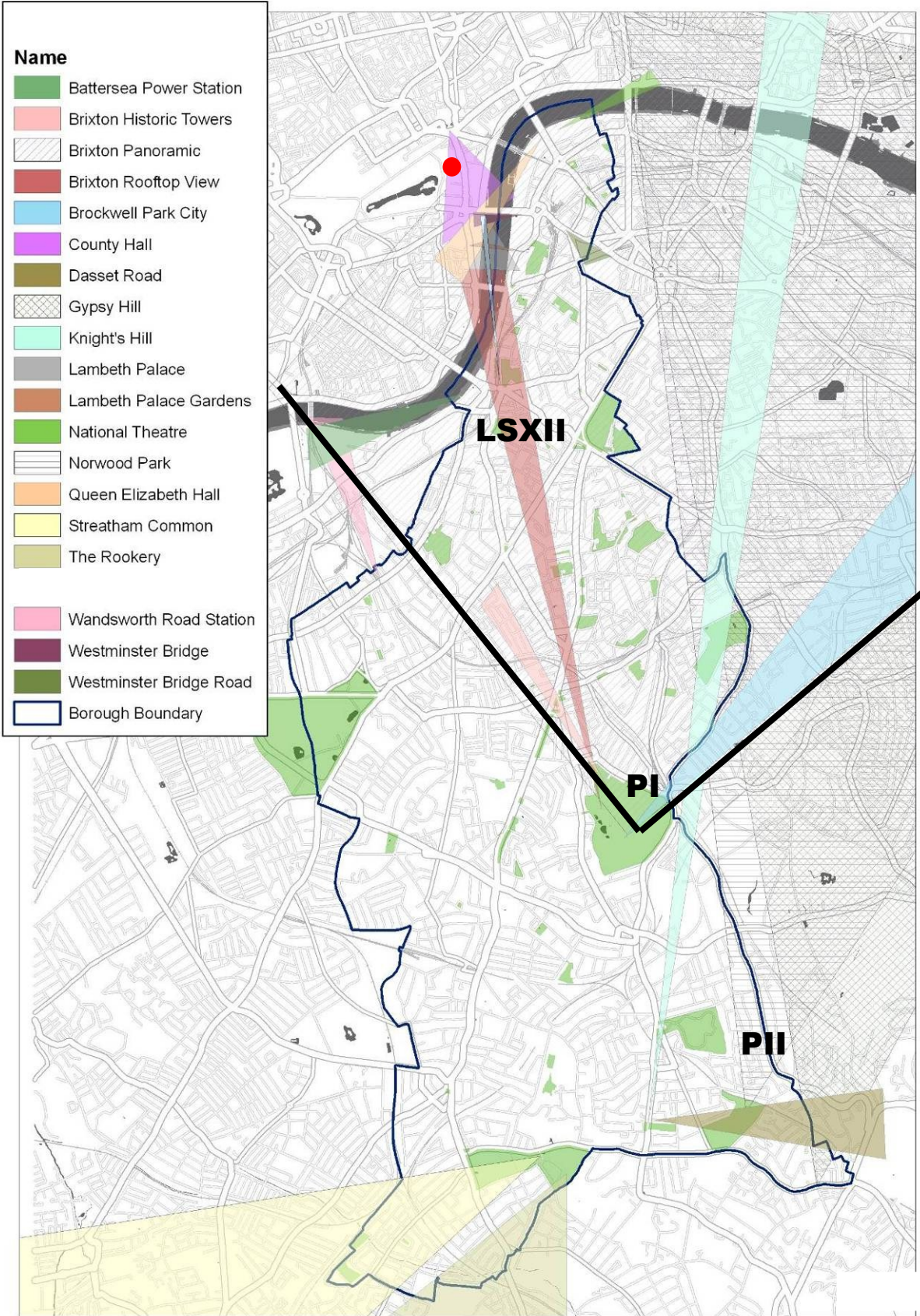
4.31 Some of these views have particular implications when it comes to tall building development. These tend to be the longer distance views where distant features are of particular interest. They are:

PI From Brockwell Park

4.31 This is a particularly wide view corridor which is cast over a large part of the north of the borough. The presence of tall and or bulky buildings close to Brockwell Park (Park View House, Herne Hill House and Meath House) and to a lesser extent the bulky buildings in the mid view (Southwyck House, Loughborough Estate) has an adverse impact on the quality of this view. Additional tall buildings development in proximity to the view point is likely to be considered inappropriate. See image on page 11. An image of an unimpeded part of the view is below.



4.32 Another aspect of this view is to the west side of the view cone. Here the Town Hall and St Matthew's Church towers in Brixton (pale pink view cone) can be seen rising above the rooftops. Whilst the backdrop silhouettes of these designated heritage assets are already disrupted by tall buildings in the back-drop— Pinter House, Arden House, Beckett House, Stockwell, the nature of this view means that tall building development in their foreground is considered inappropriate. See images on page 26 and the Brixton Tall Building Study, 2012.





Lambeth Town Hall



St Matthew's Church

PII Norwood Park to city

4.33 Like a number of locally significant distant views most of this view corridor cuts across the neighbouring boroughs (their tall buildings policies therefore have significant implications for view management in this respect). In this case one existing tall building within Lambeth — Northwood House — due to its proximity has an adverse impact on the view. See below.



B Landmark Silhouettes

4.34 This is the other type of view within the draft Local Plan. These are views focused on a particular building or asset. The objective in identifying these views is to ensure that no foreground development obscures an appreciation of, and no background development harms the silhouette of the asset in the views. Many of the assets in these views are statutory listed buildings with formal compositions the appreciation of which are enhanced by uninhibited clear-sky silhouettes. See paragraph 4.65. One landmark silhouette is particularly sensitive to tall building development because of the sheer length of the view cone:

LSXII Brockwell Park to the Palace of Westminster

4.35 The view corridor is very narrow and cuts through the centre of the Brixton Opportunity Area. The nature of the view precludes tall building development along the length of the view cone. An existing tall building (Wimborne House, Clapham Road) has a negative impact on the view. See below.



4.36 The relevant local views identified by the City of Westminster in its draft Metropolitan Views Study (2007) largely correspond with views protected by the LVMF and have been omitted for that reason. However, the red dot shows Westminster's View 35—Horse Guards Road to Horse Guards which looks to the north east. The City of London's St Paul's Heights Views Policy view positions (Waterloo Bridge and Queen's Walk to its east) have not been shown for reasons of clarity. Lambeth will continue to work in partnership with adjoining boroughs on local views and their cross-boundary impacts.

Conclusion

4.37 The Lambeth Local Views Study, 2012 will be developed into a guidance document upon the adoption of the draft Local Plan. Panorama views are generally sensitive to tall building development. Landmark Silhouettes are generally considered inappropriate for tall building development.

Transportation Accessibility

4.38 Accessibility to good transport links is imperative when considering high density new development such as tall buildings. For this reason, when developing a constraint for transportation, a decision was taken to limit the surrounding area to 800m, which is approximately 10 minutes walk. This was taken as an acceptable walk for a commuter.

4.39 The map on the facing page shows the borough's railway stations and London Underground stations. The grey areas show an 800m radius from each station. When considering transport links along it is considered that denser development is potentially possible in these accessible grey shaded areas.

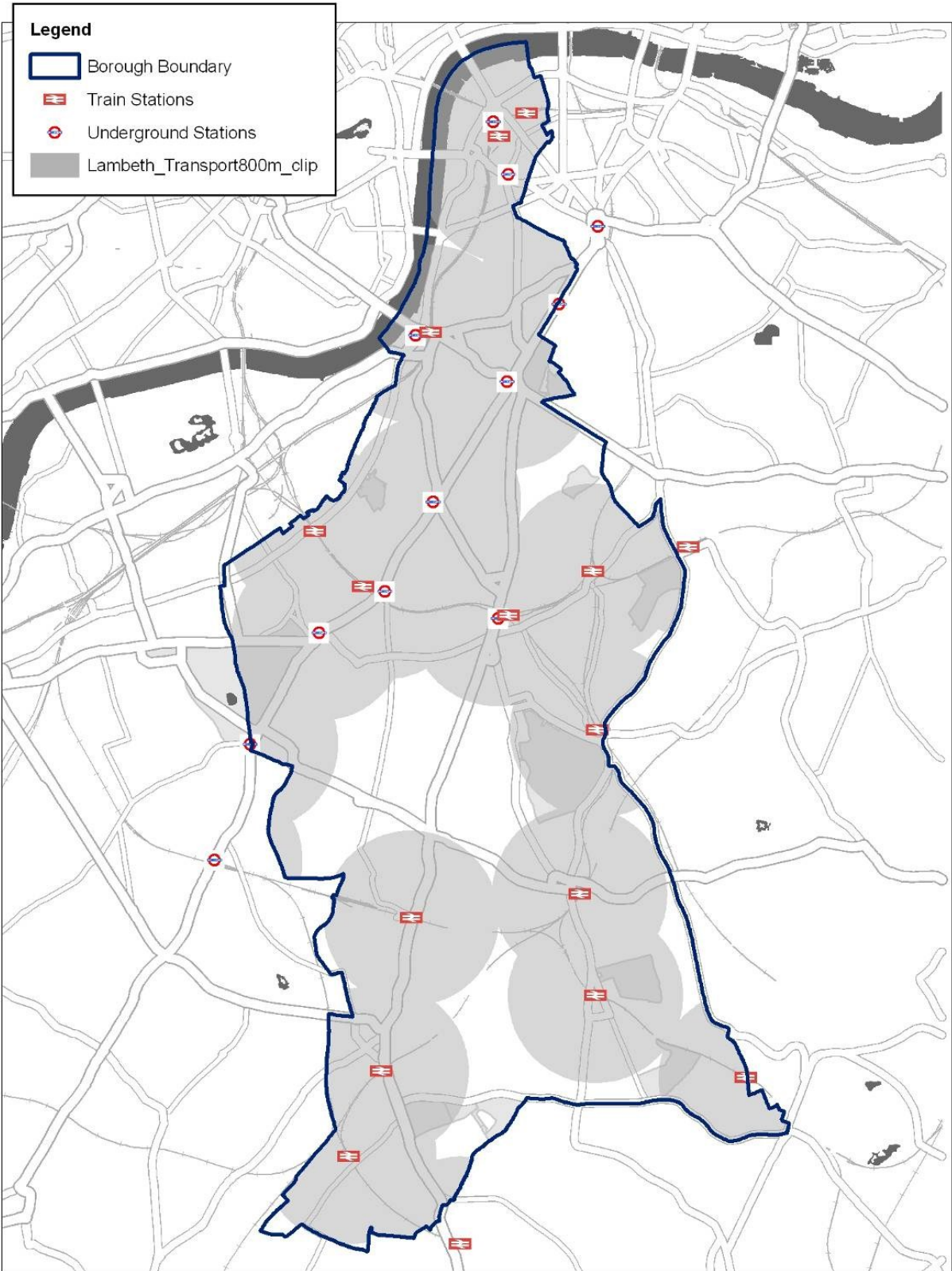
4.40 There are two noteworthy gaps in coverage. The first, to the centre of the borough, is Clapham Park / Kings Avenue. The second is to the south of the borough around Leigham Court Road / Crown Dale. Both are suburban residential areas which lie to the south of Brixton. See 4.17.

4.41 It should be noted that all stations outside Lambeth are not shown; in this instance the absence of this information is not considered to have affected the conclusions made given the good accessibility (grey areas) generally around the borough boundary.

4.42 The carrying capacity of some underground and railway stations is a consideration for future development. Vauxhall London Underground station is nearing the limit of its carrying capacity and is expected to exceed that by 2014. Similarly it is understood that Waterloo Railway Station is currently functioning at capacity.

Conclusion

4.43 The map on the facing page shows that accessibility is generally good with exceptions at Brixton Hill and Streatham Common North. Tall buildings are considered 'inappropriate' in less accessible areas. Their appropriateness elsewhere will be dependent on the specific accessibility aspects of each site as well as the other, wider planning considerations.



Major Town Centres

4.44 The Lambeth Core Strategy identifies Brixton and Streatham as Major Town Centres.

4.45 Brixton is located in a dense urban context in the centre of the borough and has a generally compact urban grain within the town centre. Brixton is also on the London Underground network, a railway station and has existing large and tall buildings. There are numerous heritage designations (including conservation areas) and local views constraints. Some existing tall buildings (International House and Chartham House) are shown below. For detailed assessment see the Brixton Tall Buildings Study, 2012 (revised 2014).



International House



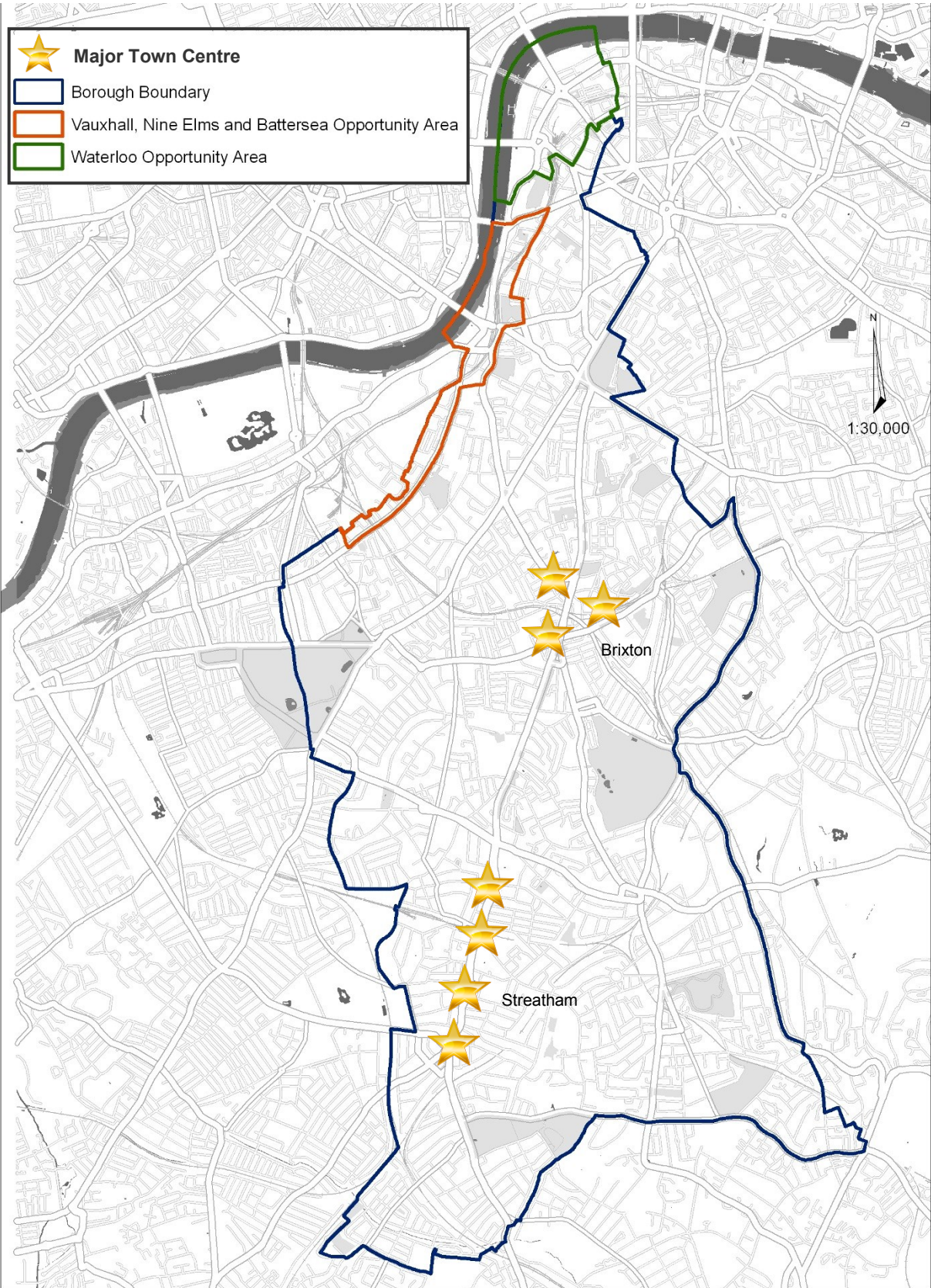
Chartham House

4.46 Streatham has a linear town centre which stretches along the length of Streatham High Road. It has large buildings fronting the High Road but is essentially a town centre thoroughfare flanked by suburban residential development. This means that only a short distance from Streatham High Road the character changes quickly to that of suburbia. Much of the town centre is a conservation area.

Conclusion

4.47 Brixton is generally considered sensitive to tall building development. See Brixton Tall Building Study, 2012 (as amended 2014) and map in Appendix 1.

4.48 Streatham, given its southern situation and its linear form in a suburban context is considered inappropriate for tall buildings.



Opportunity Areas

4.49 Waterloo and Vauxhall areas are identified as Opportunity Areas in the London Plan. The London Plan also identifies such areas as being suitable for intensification and high density development. This does not necessarily mean tall buildings in the form of point blocks. However, land ownership patterns (many small sites in separate ownership) and property values, as well as the existence of large and tall buildings in these areas already, have made them, in the Council's opinion, suitable for tall buildings.

4.50 These have already been subject to detailed analysis and assessment in relation to tall buildings in their respective OAPFs and SPD documents have been prepared for both areas.

Waterloo Opportunity Area

4.51 The map on the facing page shows the area covered by the Waterloo Opportunity Boundary and the impact of the various urban analysis layers within this boundary. Building heights are visible in their present format as are the conservation areas, local views; and relevant (Lambeth facing) LVMF views. NB views out from the WWHS are dealt with in the WWHS section. The Waterloo Opportunity Area includes the South Bank, Roupell Street, Lower Marsh and Waterloo conservation areas.

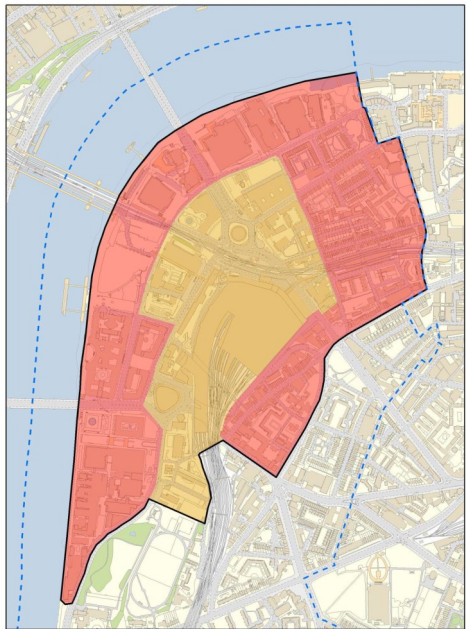
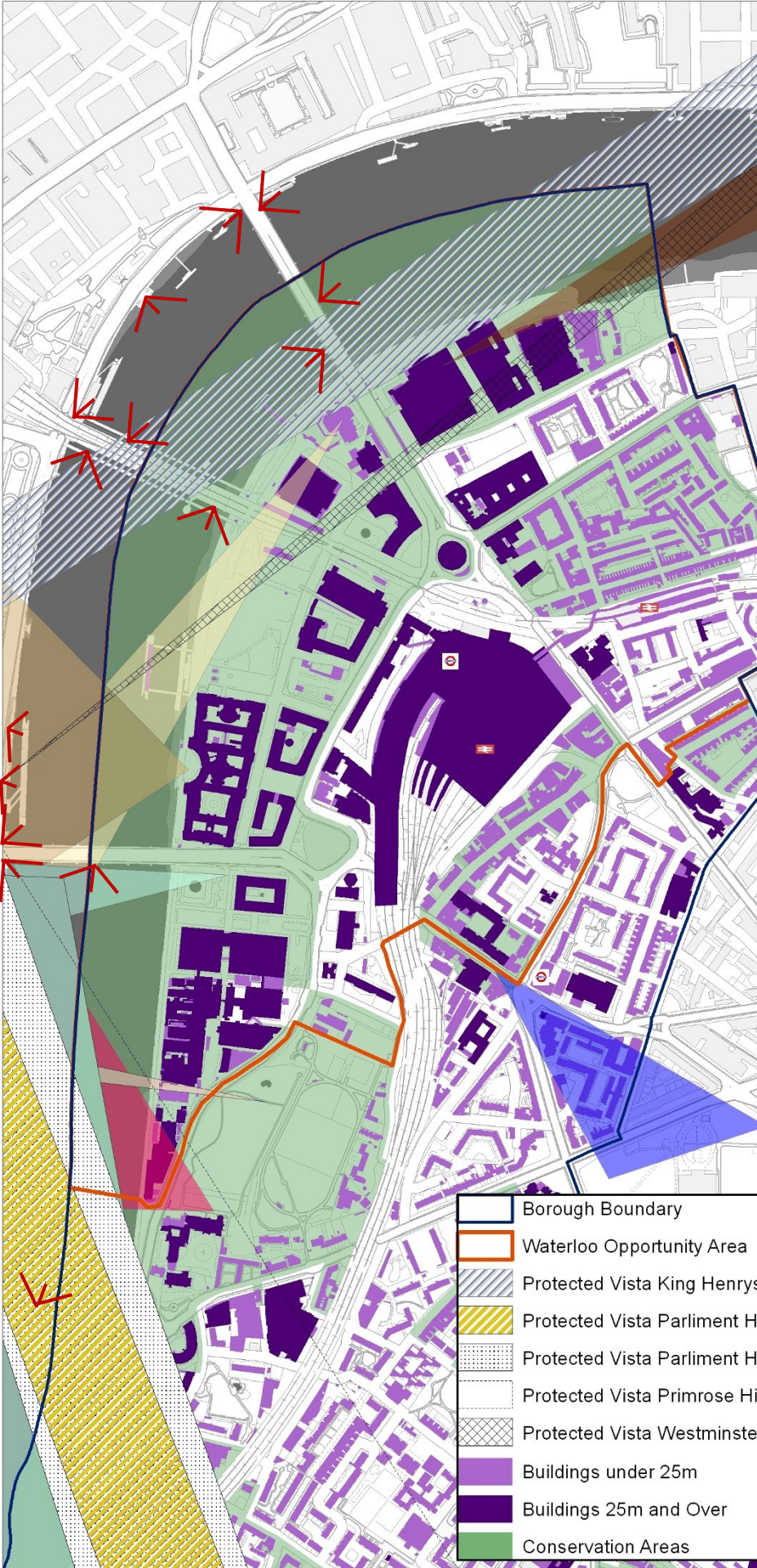
4.52 For clarity statutory listed and locally listed buildings are not shown.











4.53 The Waterloo SPD (2013) looked at the area in detail including the appropriateness of the SPD area for tall and large building development. No parts are identified as appropriate for tall building development. The inset map opposite shows Figure 11 from the adopted SPD. Waterloo Station and immediate context are considered sensitive to tall building development (coloured orange) and the remaining SPD area has been identified as inappropriate for tall building development (red); these assessments are due to significant heritage asset constraints (listed buildings and conservation areas both in Lambeth and elsewhere) including the proximity of the Westminster World Heritage Site. Please see the SPD document for further detail.

4.54 This approach was discussed at length at the Shell Centre Public Inquiry (Nov. 2013) where the Council decision to support tall buildings clustered closely around the existing Shell Centre Tower (in the area considered sensitive to tall building) was supported by both the Planning Inspectorate and the Secretary of State.

Conclusion

4.55 Given the density of the constraints within the Waterloo Opportunity area, this area should be considered part sensitive to and part inappropriate for tall building development. See map in Appendix 2.



-  Borough Boundary
-  Waterloo Opportunity Area
-  Protected Vista King Henrys Mound to St Pauls Cathedral
-  Protected Vista Parliment Hill summit to Palace of Westminster
-  Protected Vista Parliment Hill Oak Tree to Palace of Westminster
-  Protected Vista Primrose Hill to Palace of Westminster
-  Protected Vista Westminster Pier to St Pauls Cathedral
-  Buildings under 25m
-  Buildings 25m and Over
-  Conservation Areas



Vauxhall / Nine Elms Opportunity Area

4.56 The map on the facing page shows the area covered by the Vauxhall Opportunity Boundary and the impact of the various urban analysis constraints within this boundary. Building heights are visible in their present format as are the conservation areas, and protected strategic vistas. The Vauxhall Opportunity Area is most notably impacted by the adjoining Albert Embankment Conservation area which lies to the immediate north and the Vauxhall and St Mark's Conservation Areas to the east. Across the river are Westminster's Millbank, Pimlico and Dolphin Square conservation areas.

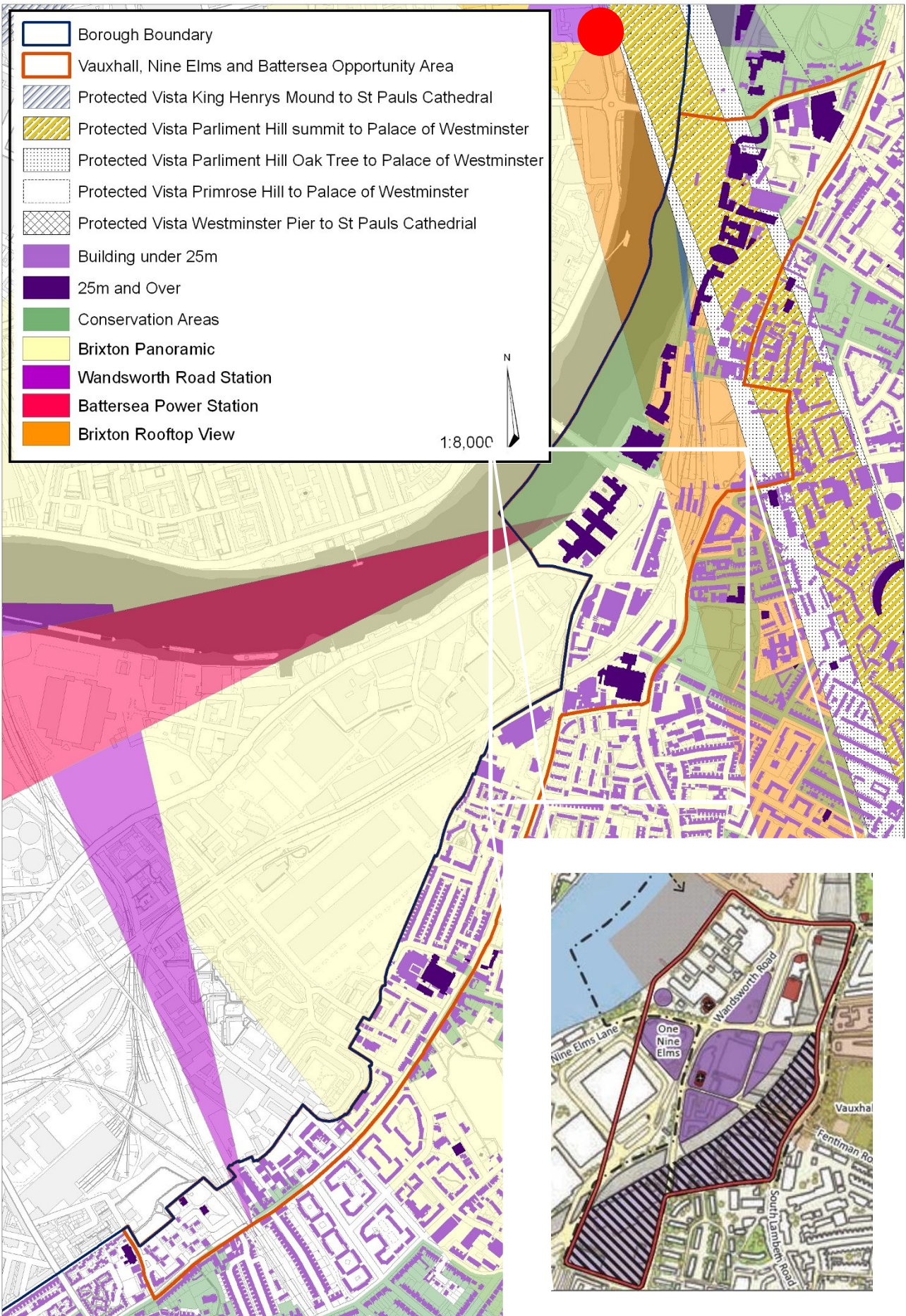
4.57 Strategic views affecting the area are—2A—Parliament Hill, 2B—Parliament Hill East, 4—Primrose Hill and 18A—Westminster Bridge. These largely cut across Albert Embankment and Vauxhall Station and are shown on the large map opposite. Local views of importance following a similar line or look out of the area. As a result there are no views constraints in the central Vauxhall area which is identified in the OAPF and Vauxhall SPD as suitable for development in the region of 150m.

4.58 The Vauxhall SPD (see inset map opposite) identifies the area south of the railway viaduct (hatched in purple) as sensitive to tall building development given the relationship with the adjoining low-rise residential hinterland to the south and east. However, the Westminster World Heritage Site lies to the north (red dot on map). Tall building development (St George Tower) is visible in the backdrop of views of the WHS from the north (Whitehall and Parliament Street). This visibility makes central Vauxhall sensitive to tall building development in heritage terms. As a result of this assessment it is now considered that the whole of Vauxhall OAPF area within Lambeth is sensitive to tall building development.

4.59 Albert Embankment lies to the south east of the WHS. Its greater proximity to the WHS, Lambeth Palace and a number of strategic views also makes it sensitive to tall building development. The OAPF and Vauxhall SPD guide buildings heights to around 90m in this location. A reduction in height is sought at the northern end where the sensitivity is deemed greater.

Conclusion

4.60 Given the proximity of this Opportunity Area to the River Thames, the settings of heritage assets (including the Westminster WHS), and the presence of the number of Strategic and Local views, the Lambeth part of the Opportunity Area is considered broadly sensitive to tall building development. See map in Appendix 3.



Heritage Assets

4.61 Heritage Asset is defined by the National Planning Practice Framework (NPPF) as: ‘

A building, monument, site, space, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).’

Designated Heritage Assets

4.62 Designated Heritage Assets are defined by the NPPF as a World Heritage Site, Scheduled Monument, Listed building, Protected Wreck, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation. Paragraph 132 of the NPPF states:

‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.’ As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.’

4.63 Designated Heritage Assets in Lambeth are as follows:

World Heritage Sites	Westminster WHS adjoins borough boundary
Scheduled Monuments	None
Listed Buildings	2,217 buildings (as opposed to list entries)
Protected Wrecks	None
Registered Park and Gardens	8
Registered Battlefields	None
Conservation Areas	62

Undesignated Heritage Assets

4.64 These are identified by the local planning authority (Lambeth Council) and are considered of local or greater importance. Lambeth’s Archaeological Priority Areas were identified some time ago in cooperation with English Heritage and have had policy basis for many years. The Lambeth local list was established in 2010 and is a work in progress. The designation of locally important spaces and landscapes is proposed within the draft Local Plan:

Archaeological Priority Areas	17
Locally Listed Buildings	380
Designed Spaces and Landscapes	22 (as proposed in draft Local Plan)

Implications of Tall Building for Heritage Assets

4.65 The impact of tall buildings on the setting of heritage assets is a very important consideration. The NPPF defines the setting of a heritage asset to be: ‘

The surroundings in which a heritage asset is experience. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of 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.’

4.66 English Heritage’s ‘The Setting of Heritage Assets’ provides detailed guidance on this matter. It explains that settings vary greatly and can include landscape and townscape. They can be designed / formal or natural and informal. It can also include views of, across and out of the asset. The relationship between the asset in the view and the viewing place may have a significance beyond just an appreciation of the aesthetic value. Examples of heritage settings in Lambeth could include:

Landscape Settings

4.67 These are relatively rare in the borough. However, Brockwell Hall (Grade II*) has a landscape setting within Brockwell Park (Grade II). Clapham Common provides a landscape setting for the Grade II listed bandstand and the monuments within West Norwood Cemetery rely greatly on the designed landscape setting of the cemetery itself (Grade II*).

Townscape Settings

4.68 This type of setting is very common given Lambeth’s built-up character. The majority of heritage assets are integral parts of established urban contexts; a great many designated and undesignated heritage assets in the borough are properties built in the 19th Century. In many places these properties sit within an urban grain of similar buildings (group value)—sharing types, built forms and materials which can often extend beyond designation itself. In such cases townscape setting is thus often complementary to the setting of the assets. However, townscape settings can also be varied—containing modern developments of varying scale and character. See Lambeth Local Distinctiveness Study (2012).

Designed / Formal Settings

4.69 The significance of heritage assets (statutory and local list) around urban squares such as Albert Square, Cleaver Square, Grafton Square and Lansdowne Gardens is enhanced by the formality of these spaces. Whilst very different in design terms the intimate domestic character of the central garden of the Thrale Almshouses, Streatham (local list) is very important to its significance.

4.70 There are a number of heritage assets across the borough that have a composition which is a direct response to a formal setting (and enhances it as a response) or which, by its architectural composition, location and silhouette has created its own formal setting of value. Thus part of their significance is reliant on an unbroken silhouette against clear sky. The best examples of these buildings have been identified in the Lambeth Local Views Study (2012) for recognition through the views policy of the draft Local Plan. These are: St Luke’s Church, West Norwood, Christ Church, Streatham, St Michael’s Church, Stockwell and Former Fire Brigade QH, 8 Albert Embankment.

Informal Settings

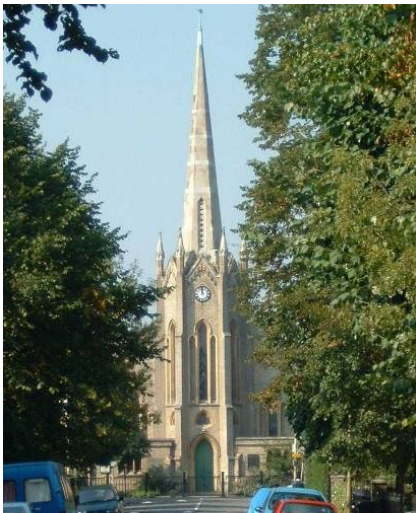
4.71 These are essentially unplanned but beneficial to the setting of the asset. With some assets the survival of a picturesque or unspoilt backdrop or foreground in an otherwise much evolved environment may be of interest. Many of Lambeth’s heritage assets benefit from unaltered backdrops. A particularly noteworthy example is Lambeth Palace—when viewed from Victoria Tower Gardens its Medieval towers and historic roofline can still be appreciated in silhouette against a clear sky—little changed in over 400 years. See Lambeth Local Views Study. See examples on following page.



Landscape Settings—Henry Tate Mews, Streatham and Brockwell Hall, Brockwell Park



Townscape Settings—Lower Marsh -looking south and looking north



Formal Settings—St Michael's Church, Stockwell and 8 Albert Embankment



Informal Settings—the silhouette of Lambeth Palace from Victoria Tower Gardens.

Describing Setting of Heritage Assets

4.72 UNESCO has raised concern about the potential impact of development on the setting of the Westminster World Heritage Site and this has resulted in two Reactive Monitoring Missions to London by ICOMOS. ICOMOS defines setting as: *‘The setting of a heritage structure, site or area is defined as the immediate and extended environment that is part of, or contributes to, its significance and distinctive character’.*

4.73 Following their last Mission in 2011 ICOMOS recommended the preparation of a setting study which would seek to define the wider and immediate setting of the Westminster WHS. This has been interpreted by some as a mapping exercise where the setting could be definitively outlined.

4.74 However, Paragraph 2.2 of the EH guidance on setting explains the difficulty of mapping settings and the fluidity of our understanding of them over time: ‘

...Setting does not have a fixed boundary and cannot be definitively and permanently described as a spatially bounded area or as lying within a set distance of a heritage asset.’ Views on what comprises a heritage asset’s setting may change as the asset and its surroundings evolve, or as the asset becomes better understood. Construction of a distant but high building; development generating noise, odour, vibration, dust over a wide area; or new understanding of the relationship between neighbouring heritage assets may all extend what might have been understood to comprise setting.’

4.75 Whilst the difficulties outlined above are accepted in terms of mapping settings the concept of the setting of a heritage asset comprising ‘immediate’ and ‘wider’ parts (as proposed by ICOMOS) is considered valid even if it can’t be mapped. In this respect the council offers the following potential definitions for Lambeth as such an approach will assist with the description of impact of development on setting:

Immediate Setting

4.76 Generally the places around the asset at ground level where the heritage asset can be viewed and appreciated along with the buildings and spaces in its locality. For built heritage new large or tall development in the immediate setting (foreground, background and adjoining) would generally be inappropriate as it is likely to dominate the asset or obscure it (or important views from it) in a harmful way. The photograph accompanying para 3.10 illustrates such an impact on Grade II* listed Brunswick House.

4.77 For landscapes immediate setting would comprise the places that immediately adjoin the landscape and or define its edges. Tall or large building development in these immediate settings would be inappropriate if it were to enclose, overshadow or restrict views from the landscape that benefits from the openness of a low-rise outlook / setting. The image accompanying para 3.09 illustrates such an impact on Grade II Brockwell Park caused by large (Meath House) and tall (Park View House) buildings in its immediate setting.

Wider Setting

4.78 For Lambeth this would be a further, wider area around the asset where development might appear in conjunction with the asset — in foreground (here it might also obscure the asset from view) or its backdrop or, largely in the case of landscapes, where development would appear in views from the asset. Tall or large building development would be inappropriate in these instances if it was to obscure or encroach upon the asset from noteworthy or important viewpoints.

Westminster World Heritage Site (WWHS)

4.79 The significance of the WWHS properties is outlined in the statement of Outstanding Universal Value (OUV) - see Appendix 5. It has global significance and is a major tourist destination drawing hundreds of thousands of visitors every year. The Elizabeth Tower is generally accepted as the landmark of the WHS and as such it is photographed and appreciated by the vast majority of visitors to Parliament Square, Westminster Bridge and the South Bank.

4.80 The focus of attention in recent years has been is the visibility of tall building proposals in the setting of the WWHS—especially those in the gap between Big Ben and Portcullis House. At present for much of that view through this gap the only building that is visible is County Hall – its low form silhouette presented against a clear sky. This gap is important as a visual space which allows Big Ben to appear as the key architectural component silhouetted against a clear sky. The presence in the gap of County Hall adds historic significance as it was the home of regional government in London. The clear sky gives these elements a defined silhouette.

4.80 The adopted WWHS Management Plan (May 2007) states:

'Para. 1.6.4.2... Other important views beyond the World Heritage Site are also numerous. Particularly famous views of features include:...

... Big Ben from all angles and in particular for Parliament Square, Westminster Bridge and Albert Embankment, and from Trafalgar Square and when travelling south down to Whitehall.

Para. 3.1.3.2 There is currently no buffer zone, as defined in the operational guidelines, which would help to sustain the special qualities of the setting of the WHS. Without appropriate consideration of the sensitivities of the WHS and its setting, development beyond the WHS boundary of a large scale may pose risks to this key element of Outstanding Universal Value. Any changes to the style or backdrop of the WHS from many angles, must be carefully balanced against the need to preserve the iconic value of the site.

4.82 World Heritage Sites are designated by UNESCO with technical support from ICOMOS. In recent years UNESCO has been concerned about the potential harmful impact on new development on the setting of the Westminster World Heritage Site. The chronology is set out below:

4.83 In 2006 ICOMOS / UNESCO undertook a monitoring mission to London to consider the threats to the World Heritage Site. In 2006 UNESCO recommended were:

*"5. Notes with concern that the State Party acknowledges that major developments currently being considered could have a potential impact on the property;
6. Requests the State Party to evaluate the impact of proposed changes to the visual setting of the property on its Outstanding Universal Value, and to develop and apply effective mechanisms for the protection of the setting as a matter of urgency;
7. Also requests the State Party to refrain from approving any new development project until an adequate protection of the setting of the property is in place."*

4.84 In response to the concerns raised in 2006 The Mayor of London introduced additional LVMF views within Parliament Square and other work was done to strengthen planning policy and guidance around World Heritage Site designations. In December 2011 a Reactive Monitoring Mission was undertaken to Westminster by ICOMOS for UNESCO. It considered then that the most pressing threat to the OUV of this World Heritage Site was

development within the setting of the World Heritage Site on the Lambeth side of the River Thames. Lambeth's proximity to the World Heritage Site makes development at Waterloo and Vauxhall particularly sensitive in this respect. At the time of the Mission the Elizabeth House scheme was already in development and at pre-application stage. Mindful of the controversy surrounding the first Elizabeth House scheme (refused following call-in by the Secretary of State) the ICOMOS assessors stated:

“The redevelopment project of Elizabeth House will be a litmus test as regards the robustness of the national planning system vis-à-vis the protection and conservation of London’s World Heritage sites.”

“...., the redevelopment of Elizabeth House, adjacent to Waterloo Station, will be a litmus test for the sitting Mayor and his administration to demonstrate the robustness of the planning system and their sensitivity towards protecting London’s prime heritage assets. If a planning proposal for a tall building is put forward that threatens to destroy the visual integrity of the World Heritage Site of Westminster, which will be given planning consent and a permit in spite of the negative impact, the inevitable conclusions will have to be drawn concerning the effectiveness of the management system put in place.”

4.85 Following Judicial Review in relation to the decision of the Secretary of State not to call the most recent Elizabeth House case in for his consideration. The application is currently being considered on its planning merits by Lambeth Council . UNESCO is considering placing the WHS on its ‘endangered list’.

4.86 The degree of harm caused by the Elizabeth House proposal in views from the WWHS is the crux of this issue. Some parties consider any loss of the sky gap between Big Ben and Portcullis House to be harmful, for others the extent of harm is a matter of judgement based on the amount of encroachment into the gap, the appearance of the proposal and whether or not it attaches itself to the Elizabeth Tower. The Mayor’s LVMF does not cover all viewpoints. It should be noted too that the para. 133 of NPPF allows for harm to heritage assets (including their setting) to be offset by the substantial public benefits of a proposal.

4.87 The preparation of a setting study, as recommended by ICOMOS, is being considered by the stakeholders of the WWHS Steering Group of which Lambeth is a member. NB The Mayor of London’s World Heritage Site SPD provides detailed guidance in relation to development in the setting of the World Heritage Site, so too does the LVMF.

Conclusion

4.88 The proximity of Waterloo and Vauxhall to the WWHS and their designation as Opportunity Areas may appear in some respects to be contradictory. However, the Mayor of London has identified these parts of Lambeth as suitable for tall building development through their respective Opportunity Area Planning Frameworks and this is supported in planning guidance for these areas. Whilst views from the World Heritage Site towards Lambeth are limited the wider setting of the WWHS is considered particularly sensitive to tall building development . See Opportunity Areas section—page 28. Lambeth is committed to working in partnership with the WWHS steering group on the preparation of a setting study as requested by ICOMOS / UNESCO (see para. 4.72).

Listed Buildings

Statutory List

4.89 The Planning (Listed Buildings and Conservation Areas) Act, 1990 (as amended) places a statutory obligation on the council to pay special regard to the desirability of preserving the special interest of listed buildings. This includes the protection of their setting.

4.90 There are 2,317 statutory listed buildings in Lambeth—buildings of national importance:

Grade I	7
Grade II*	88
Grade II	2,222

4.91 As outlined in the Lambeth Local Distinctiveness Study 2012 the majority of Lambeth's statutory listed buildings represent the best examples of 'every day' buildings and areas. Houses, public houses, places of worship, commercial buildings, boundary enclosures, water troughs and even milestones. They typically date from between 1800 and 1840 and have been listed largely for their intactness or rarity. Of the stock 88% are in conservation areas and 75% are terraced, semi-detached or detached residential properties:



Locally Listed Buildings

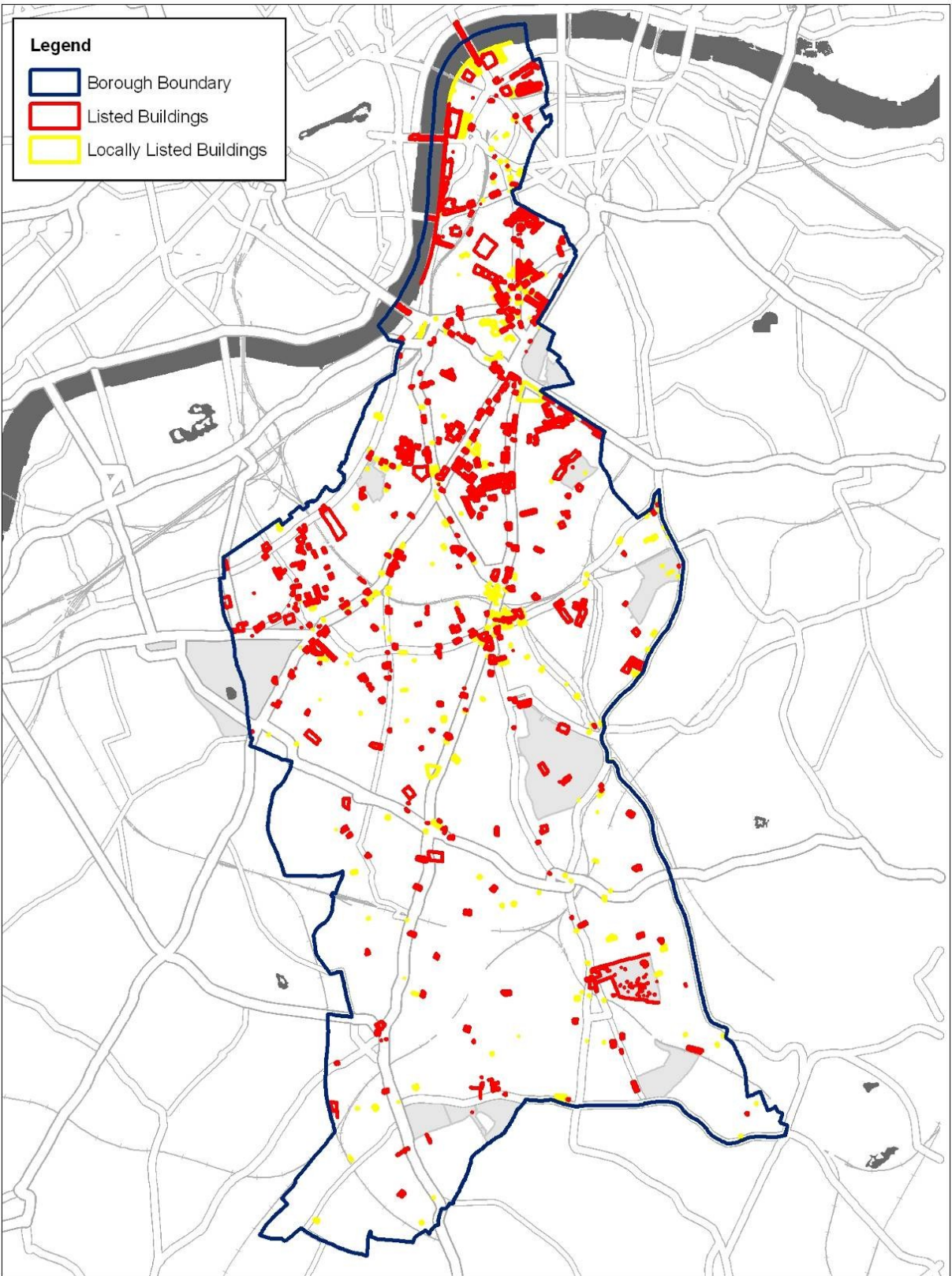
4.92 Furthermore, around 380 buildings are currently on Lambeth's local list (this number is likely to increase as survey continues). Buildings on both lists share similar characteristics. The priority of early local listing designations (since 2010) has been in places outside conservation areas. At present 34% of locally listed buildings are terraced, detached or semi-detached houses and 64% are in conservation areas.

4.93 The map on the facing page shows the disposition of listed buildings within Lambeth. Both types of building are found across the borough although there are greater concentrations in the northern half. This reflects the historic development of Lambeth which generally started from the north and crept southwards as London grew during the 19th Century.

Conclusion

4.94 Tall and large building development within the curtilage or immediate setting of listed buildings is generally considered 'inappropriate' because the modest scale of the vast majority of listed buildings makes them highly vulnerable.

4.95 The wider setting of each listed building is different and it can be difficult to make general assumptions given the complex character of Lambeth's urban and city character areas. As a result the wider settings of listed buildings are generally considered sensitive to large or tall building development.



Conservation Areas

4.96 The Council has a statutory duty to pay special regard to the desirability of preserving or enhancing the character or appearance of conservation areas (including their settings) when making planning decisions. This includes conservation areas outside the borough where development within Lambeth might have an impact on setting (which includes views in and out).

4.97 The map shows Lambeth's 62 conservation areas as well as those in the adjoining boroughs of Croydon, Southwark and Wandsworth. Conservation areas cover about 1/3 of Lambeth and are a key aspect of its local distinctiveness. See local character section.

4.98 The distribution of conservation areas is relatively even across the borough. There are more, but smaller conservation areas to the north and fewer but larger conservation areas to the South. Lambeth has a full photograph record of all conservation areas and up-to-date appraisal documents for 1/3 of its conservation areas (for a list of these see Appendix 2, page 50). Most conservation areas in Lambeth (and indeed in the adjoining boroughs) comprise development predominantly from the 19th Century which is largely characterised by buildings between 2 and 5 storeys. They fall into three main character types:

Town Centre	11	(example—Clapham High Street)
Residential	47	(example—Sunnyhill Road)
Landscapes	04	(example—West Norwood Cemetery)

4.99 The South Bank Conservation Area is Lambeth's most note-worthy exception; having the Shell Centre tower at its heart as well as other tall and large 20th Century buildings. Most of Lambeth's existing tall buildings (tower blocks and slab blocks) are outside conservation areas; although buildings with tall features such as church towers are often within conservation areas.

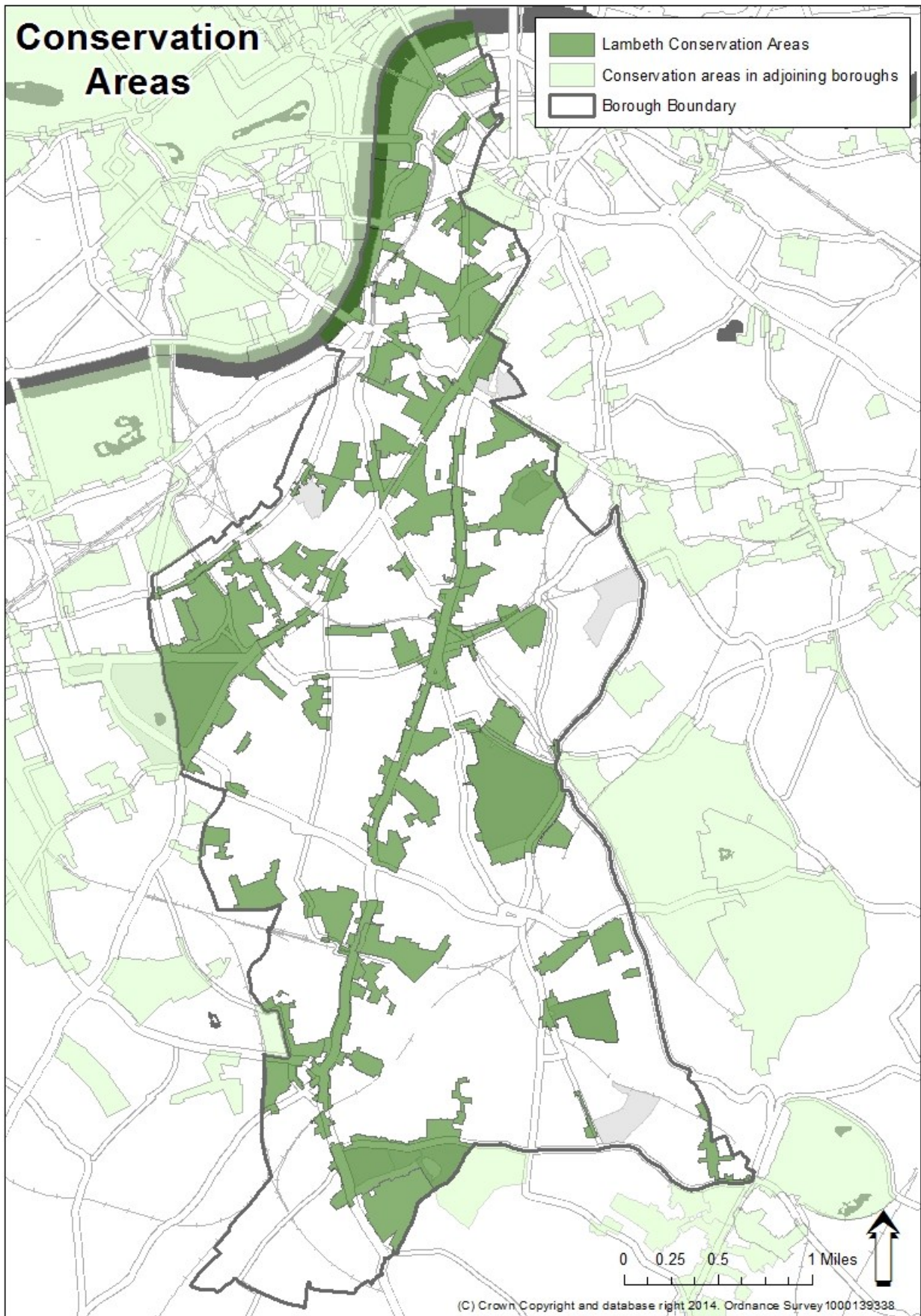
4.100 Given the dense urban nature of the northern part of borough it is not unusual for existing tall building development to be visible from within conservation areas there. Some conservation area statements, such as those for Roupell Street (2007) and Kennington (2009) identify tall building development in the setting of the area to be harmful; others do not. This area may require further work in order to ensure a consistent approach for future assessment. Visibility itself should not, in most cases, denote harm; form, materials, scale, etc. all need to be considerations.

4.101 Some people consider that tall buildings illustrate the evolution of the wider city beyond; others consider their visibility from conservation areas to be unacceptable in principle. A balanced approach is required—the impact of existing or proposed tall development on the setting of the conservation is very much dependent on the quality of the tall building, its orientation and materials as well as the character of the conservation area.

4.102 The settings of City of Westminster's Pimlico, Millbank, Smith Square, Westminster Abbey and Parliament Square, Whitehall, Savoy, Strand and Royal Parks conservation areas are sensitive to tall building development in north Lambeth.

Conclusion

4.103 In most instances tall building development will be inappropriate within conservation areas. The settings of conservation areas are considered 'sensitive to' tall building development.



Historic Landscapes

4.104 Eight of Lambeth's open spaces are on the national Register of Historic Parks and Gardens. The preservation of their special interest is a statutory obligation. These designated landscapes are:

- Brockwell Park—the open parkland to a mansion. Here buildings are considered to harm the open setting of this designated landscapes (see para. 3.9). Whilst views of church spires and other historic towers are considered of merit to it (top left).
- Kennington Park—former common laid as a public park
- Lambeth Palace—private gardens of Archbishop of Canterbury. Here the large modern building of the adjoining Evelina Hospital and other hospital blocks have an overbearing impact on the setting of the landscape yet in other views out the experience is almost as if the city does not exist beyond the garden walls. See draft Lambeth Palace Conservation Area Statement (2013).
- Myatts Fields—a Victorian public park.
- Park Hall (Henry Tate Mews) - the gardens to a mansion.
- Ruskin Park—A Victorian public park. The large buildings of Kings College Hospital provide a visually untidy setting to Ruskin Park. However, the tower of William Booth College in Southwark is something of a landmark feature.
- The Rookery—former gardens to a demolished mansion,
- West Norwood Cemetery—19th Century Cemetery (bottom right)

4.105 Tall buildings are generally not features in the settings of Kennington Park, Myatts Fields, The Rookery or West Norwood Cemetery.

Local Designed Spaces and Landscapes

4.106 The draft Local Plan proposes the inclusion of landscapes within the already established Local List. These were identified through survey using Marjorie Draper's 'Lambeth's Open Spaces—an historical account', (1979). Twenty two spaces are proposed for inclusion; these are largely formal urban squares and historic churchyards / burial grounds.

4.107 Much of the value of historic landscapes is their mature, established character. The majority are open, spacious and surrounded by urban development but in the larger landscapes this is often not apparent once the user is within the landscapes as mature trees and other planting provide effective screening. However, even mature tree screening is only effective to about 4 storeys—any development above that height is normally visible.

Conclusion

4.108 Whilst the appropriateness of large and tall building development will be dependant on the proximity and form of development it is considered that historic landscapes and their immediate settings are generally inappropriate for tall building development and their wider settings are generally sensitive to tall building development.

Historic Parks and Gardens





Evelina Hospital from Lambeth Palace garden



Henry Tate Mews, Streatham



Brockwell Park



Ruskin Park



Kennington Park



The Rookery



Myatts Fields



West Norwood Cemetery

Analysis Conclusions—Table Summary

4.109 The table below and opposite is provided to give a summary of the conclusions of each topic.

4.110 Careful consideration has been given to trying to map these findings into 'appropriate for', 'sensitive to' and 'inappropriate for' zones. However, it is impossible to map definitive immediate and wider settings for heritage assets. For this reason a tabular conclusion is preferred.

	Appropriate	Sensitive to	In appropriate
Topography			
Flat topography (N of borough)		Orange	
Undistinguished topography (mid, W and SW of borough)		Orange	
Herne Hill / Denmark Hill (elevated ground to E of borough)			Red
West Norwood / Upper Norwood (elevated ground to SE of borough)			Red
Open Space			
On open spaces			Red
Immediate settings of open spaces			Red
Wider settings of open spaces		Orange	
Local Character			
City Centre Areas (N of borough)		Orange	
Urban Areas (mid borough)		Orange	
Suburban Areas (S of South Circular road)			Red
Views—Strategic			
geometrically defined protected vistas (9A.1, 2A.2 2B.1 4.2 and 8.1A) and Parliament back-drop of view 27 (A&B)			Red
All other strategic views affecting Lambeth		Orange	

4.111 The vast majority of the borough is sensitive to tall building development. The sensitivities will vary greatly. Within this area of sensitivity there will be places where the erection of a tall or large buildings will have no adverse impact. However, there are likely to be other locations where the impacts are so adverse that tall or large buildings will be considered inappropriate. These matters need to be considered on a case by case basis using the relevant planning policy framework.

	Appropriate	Sensitive to	In appropriate
Local views			
Landmark Silhouettes			■
Panorama views		■	
Transport Accessibility			
Less accessible locations (ten minutes or more from a station)			■
Accessible locations		■	
Major Town Centres			
Streatham			■
Brixton		■	■
Opportunity Areas			
Waterloo Opportunity Area		■	■
Vauxhall Opportunity Area		■	
Westminster World Heritage Site			
Setting		■	
Listed Buildings			
listed buildings— Curtilage / immediate setting			■
listed buildings— wider setting		■	
Conservation Areas			
Within conservation areas			■
Setting of conservation areas		■	
Historic Landscapes			
Within historic landscapes Immediate setting			■
Wider Setting		■	

5. Conclusion / Recommendations

Existing Large and Tall Buildings

5.1 Existing tall building development is generally found in the north half of the borough (North of Brixton). However, 1960s council towers are more dispersed. Not all existing buildings are considered appropriate in their contexts. Opportunities for improvement / removal of the less successful examples should be considered.

Topography

5.2 The flat land to the north of the borough, especially around the River Thames, is considered sensitive to tall building development. The elevated topography to the east and south east of the borough is generally considered inappropriate for tall building development.

Open Space

5.3 Open spaces are inappropriate locations for new tall and large buildings. The settings of open spaces are considered to be sensitive.

Local Character

5.4 The suburban areas to the south of the Borough, being lower density, furthest from central London and quieter are considered inappropriate for tall building development. Appropriateness elsewhere for tall buildings is dependant on other constraints.

Strategic Views

5.5 Strategic 'protected vista' views affecting Lambeth are considered 'inappropriate' locations for tall buildings where they are geometrically defined or seek to protect a silhouette. The other strategic views are sensitive to tall building development with the exception of View 27A & B where the backdrop of the Palace of Westminster is inappropriate for tall building development.

Local Views

5.6 Most local Panorama Views (especially Panorama i and Panorama ii) are considered sensitive to tall building development. Landmark Silhouette views are generally considered inappropriate for tall building development.

Transport Accessibility

5.7 Areas more than ten minutes walk from railway and underground stations are considered inappropriate for tall building development.

Major Town Centres

5.8 Streatham, is considered inappropriate for tall buildings. The Brixton Tall Buildings Study (2012, revisited 2014) has concluded that Brixton is part sensitive and part inappropriate to tall building development.

Waterloo Opportunity Area

5.9 This area is considered part inappropriate and part sensitive to tall building development.

Vauxhall Opportunity Area

5.10 This area is considered sensitive to tall building development.

Heritage Assets

5.11 The terms 'immediate setting' and 'wider setting' may help with the assessment and description of settings.

Westminster World Heritage Site

5.12 The wider setting of the WWHS is particularly sensitive to tall building development.

Listed Buildings

5.13 The curtilages and immediate settings of listed buildings are considered inappropriate for tall building development. The wider settings are sensitive.

Conservation Areas

5.14 Conservation areas are generally considered inappropriate for tall building development. The settings of conservation areas are considered sensitive.

Historic Landscapes

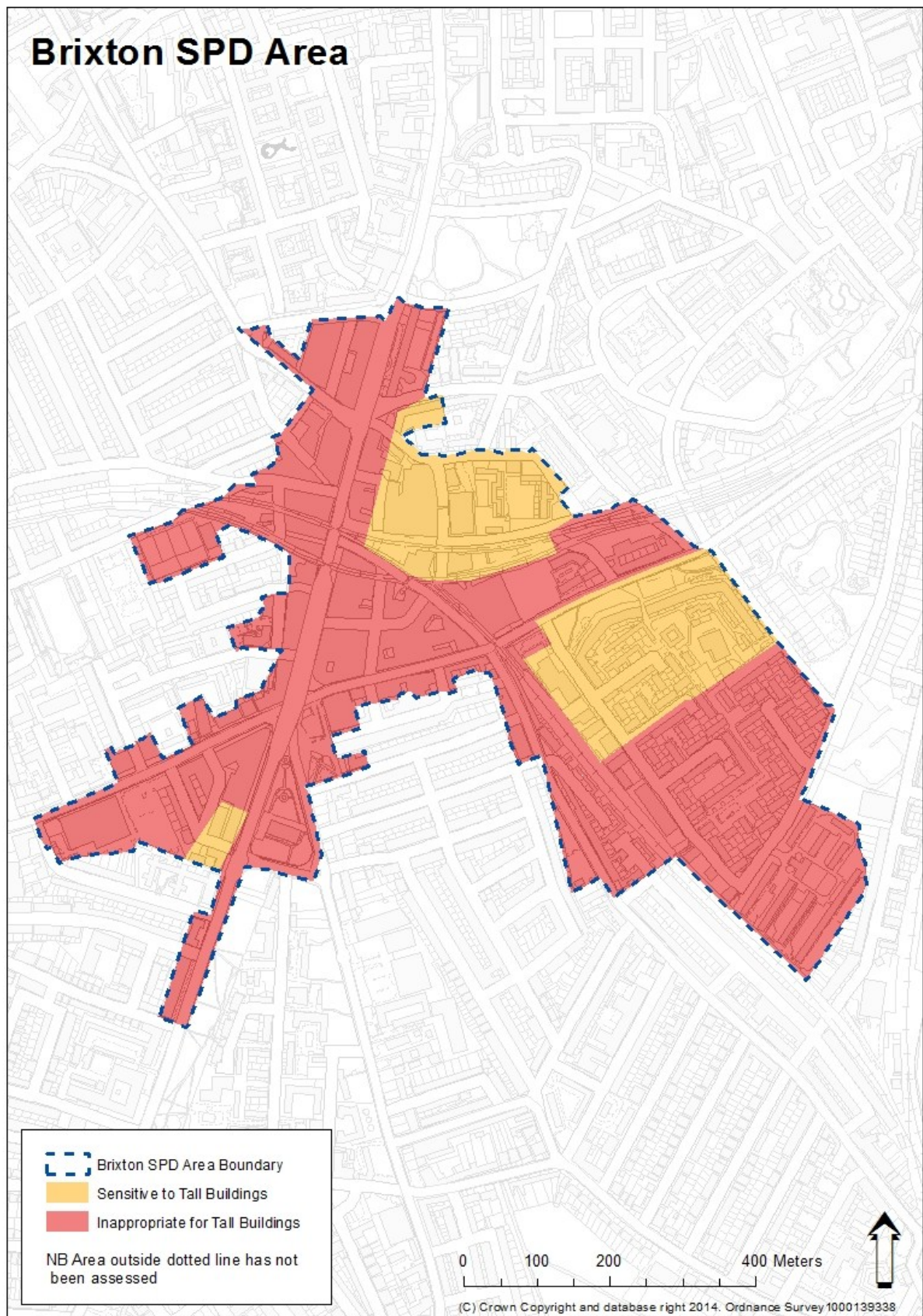
5.15 Historic landscapes and their immediate settings are inappropriate for tall building development. Wider settings are considered sensitive.

Recommendations

5.16 The following recommendations are made:

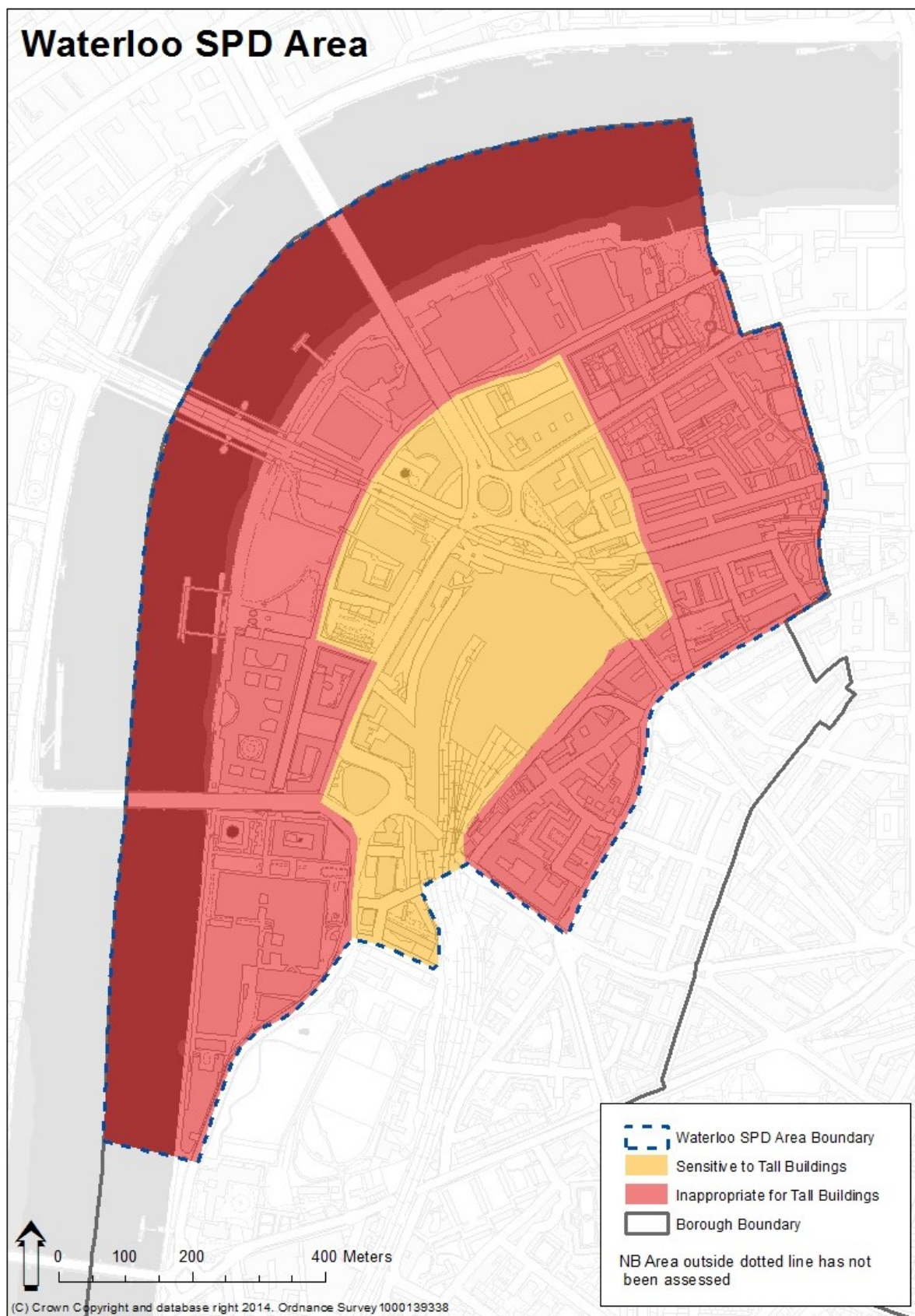
- 1) No parts of Lambeth have been identified as appropriate for tall building.
- 2) The existing Vauxhall and Waterloo Opportunity Areas and Brixton Town centre are best placed to accommodate intensification.
- 3) The setting of Westminster World Heritage Site is a critical sensitivity for both Opportunity Areas. UNESCO has requested that a study that defines the immediate and wider setting of the WWHS be prepared and this is being considered by stakeholders.
- 4) Suburban character, distance from the centre of London, open spaces and the historic environment generally render large parts of the borough inappropriate for tall building development.
- 5) Local experience suggests that point blocks tend to be much more successful in townscape and local views terms than slab blocks. See Lambeth Views Study, 2012 and Lambeth Local Distinctiveness Study (2012). Consideration should be given to encouraging the former and discouraging the latter through policy.
- 6) Opportunities should be taken in policy to encourage the removal / enhancement of large or tall buildings that impact adversely on local and strategic views. The Lambeth Views Study, 2012 identifies examples.

APPENDIX 1 Map of Brixton showing tall building sensitivities



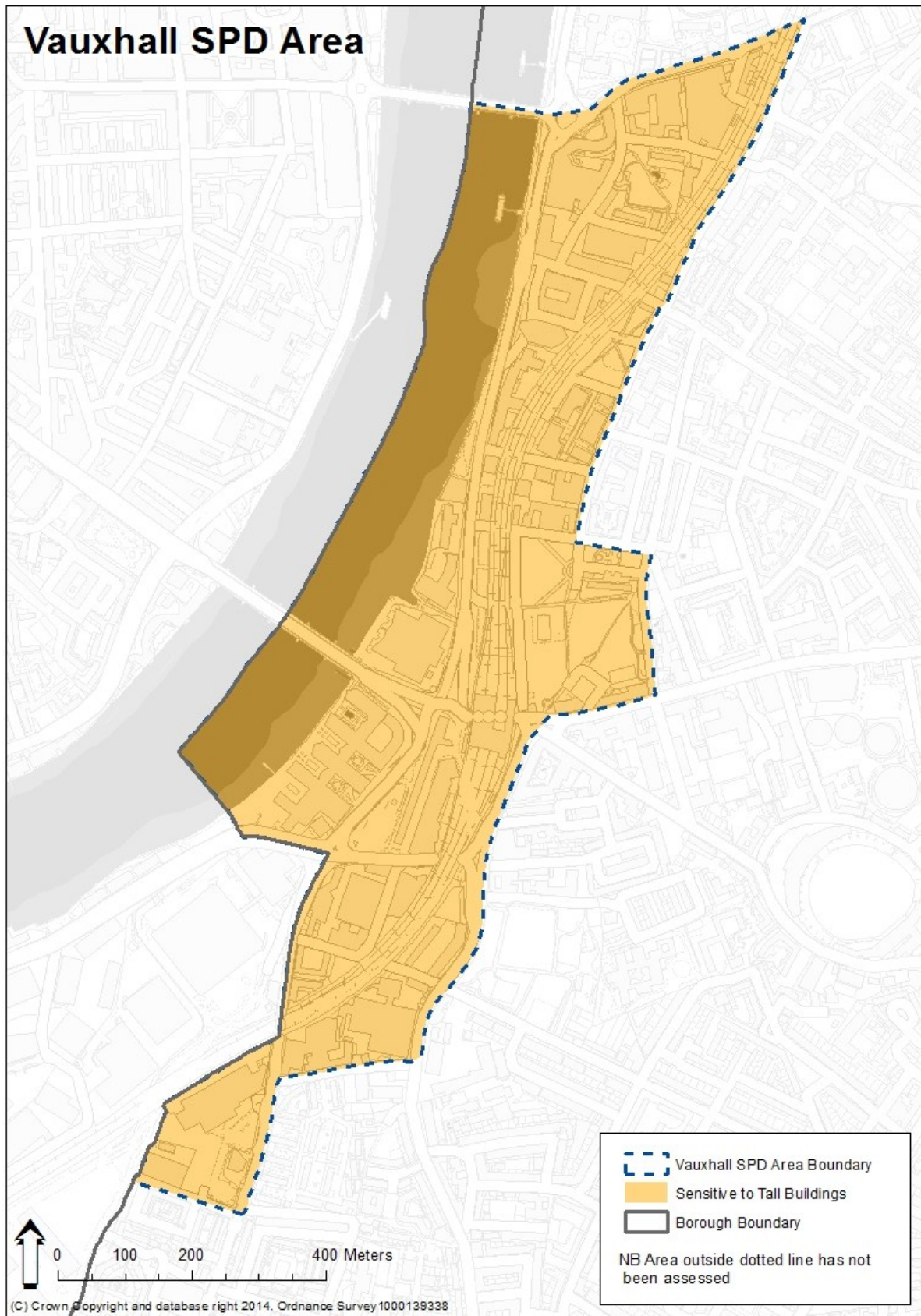
Within an area of sensitivity there will be places where the erection of a tall or large buildings will have no adverse impact. However, there are likely to be other locations where the impacts are so adverse that tall or large buildings will be considered inappropriate. These matters need to be considered on a case by case basis using the relevant planning policy framework.

APPENDIX 2 Map of Waterloo showing tall building sensitivities



Within an area of sensitivity there will be places where the erection of a tall or large buildings will have no adverse impact. However, there are likely to be other locations where the impacts are so adverse that tall or large buildings will be considered inappropriate. These matters need to be considered on a case by case basis using the relevant planning policy framework.

APPENDIX 3 Map of Vauxhall showing tall building sensitivities



Within an area of sensitivity there will be places where the erection of a tall or large buildings will have no adverse impact. However, there are likely to be other locations where the impacts are so adverse that tall or large buildings will be considered inappropriate. These matters need to be considered on a case by case basis using the relevant planning policy framework.

APPENDIX 4—Conservation Areas with character appraisals

Conservation Areas with new-format (post 2007) character appraisals:

Albert Square (2009)

Mid 19th Century housing focused around a formal space.

Brixton (2012)

19th Century town centre.

Clapham High Street (2009)

19th Century high street.

Clapham Road (2012)

Early 19th Century and late 19th Century housing

Hackford Road (2009)

Early 19th Century housing.

Herne Hill (2012)

Early 20th Century commercial premises.

Hyde Farm (draft, 2014)

Early 20th Century housing.

Kennington (2012)

19th and early 20th Century housing.

Lambeth Palace (draft, 2013)

Palace complex with designed landscaped.

Lansdowne Gardens (2009)

Mid 19th Century housing focused around a formal space.

Larkhall (2012)

Mid 19th Century housing.

Lower Marsh (2007)

19th Century town centre.

Mitre Road and Ufford Street (2007)

Late 19th C housing.

Rectory Grove (2009)

Mid 19th Century housing.

Renfrew Road (2007)

Mid 19th Century civic buildings.

Roupell Street (2007)

Mid 19th Century housing.

South Bank (2007)

20th Century Civic and Arts area.

South Lambeth Road (2012)

19th Century housing.

Stockwell Park (2009)

Early and mid 19th Century housing.

Waterloo (2007)

Early 19th and early 20th Century urban area.

Appendix 5 - WWHS Statement of Outstanding Universal Value

Property Westminster Palace, Westminster Abbey and Saint Margaret's Church

Date of inscription 1987 - 2008

Brief synthesis

The Palace of Westminster, Westminster Abbey and St Margaret's Church lie next to the River Thames in the heart of London. With their intricate silhouettes, they have symbolised monarchy, religion and power since Edward the Confessor built his palace and church on Thorney Island in the 11th century AD. Changing through the centuries together, they represent the journey from a feudal society to a modern democracy and show the intertwined history of church, monarchy and state.

The Palace of Westminster, Westminster Abbey and St Margaret's Church continue in their original functions and play a pivotal role in society and government, with the Abbey being the place where monarchs are crowned, married and buried. It is also a focus for national memorials of those who have served their country, whether prominent individuals or representatives, such as the tomb of the Unknown Warrior. The Abbey, a place of worship for over 1000 years, maintains the daily cycle of worship as well as being the church where major national celebrations and cultural events are held. The Palace of Westminster continues to be the seat of Parliament.

Westminster School can trace its origins back to 1178 and was re-founded by Queen Elizabeth I in 1560. It is located around Little Dean's Yard.

The iconic silhouette of the ensemble is an intrinsic part of its identity, which is recognised internationally with the sound of "Big Ben" being broadcast regularly around the world.

The Palace of Westminster, Westminster Abbey, and St Margaret's Church together encapsulate the history of one of the most ancient parliamentary monarchies of present times and the growth of parliamentary and constitutional institutions.

In tangible form, Westminster Abbey is a striking example of the successive phases of English Gothic art and architecture and the inspiration for the work of Charles Barry and Augustus Welby Pugin on the Palace of Westminster.

The Palace of Westminster illustrates in colossal form the grandeur of constitutional monarchy and the principle of the bicameral parliamentary system, as envisaged in the 19th century, constructed through English architectural references to show the national character.

The Palace is one of the most significant monuments of neo-Gothic architecture, as an outstanding, coherent and complete example of neo-Gothic style. Westminster Hall is a key monument of the Perpendicular style and its admirable oak roof is one of the greatest achievements of medieval construction in wood. Westminster is a place in which great historical events have taken place that shaped the English and British nations.

The church of St Margaret, a charming perpendicular style construction, continues to be the parish church of the Palace of Westminster and has been the place of worship of the Speaker and the House of Commons since 1614 and is an integral part of the complex.

Criterion (i): Westminster Abbey is a unique artistic construction representing a striking se-

quence of the successive phases of English Gothic art.

Criterion (ii): Other than its influence on English architecture during the Middle Ages, the Abbey has played another leading role by influencing the work of Charles Barry and Augustus Welby Pugin in Westminster Palace, in the "Gothic Revival" of the 19th century.

Criterion (iv): The Abbey, the Palace, and St Margaret's illustrate in a concrete way the specificities of parliamentary monarchy over a period of time as long as nine centuries. Whether one looks at the royal tombs, the Chapter House, the remarkable vastness of Westminster Hall, of the House of Lords, or of the House of Commons, art is everywhere present and harmonious, making a veritable museum of the history of the United Kingdom.

Integrity

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

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

The distinctive skyline is still prominent and recognisable despite the presence of a few tall buildings as part of the property. The most prominent of these, Milbank Tower and to some extent Centre Point - now protected in their own right - were both extant at the time of inscription. However important views of the property are vulnerable to development projects for tall buildings. Discussions have begun and are ongoing on how to ensure that the skyline of the property and its overall prominence is sustained, and key views into, within and out of the property are conserved. The main challenge is agreeing on a mechanism to define and give protection to its wider setting. Until agreement can be reached on this, the integrity of the site is under threat.

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

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

Authenticity

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

well as in their form and design.

The property maintains its principal historic uses and functions effectively. The Gothic Westminster Abbey, a working church, continues to be used as a place of daily worship. It remains the Coronation church of the nation and there are frequent services to mark significant national events as well as royal weddings and funerals and for great national services. Many great British writers, artists, politicians and scientists are buried or memorialised here. The Palace of Westminster continues to be used as the seat of the United Kingdom's two-chamber system of democracy. St Margaret's Church, now part of Westminster Abbey, remains at heart a medieval parish church, ministering to Members of both Houses of Parliament.

Protection and management requirements

The UK Government protects World Heritage properties in England in two ways. Firstly individual buildings, monuments and landscapes are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990, and the 1979 Ancient Monuments and Archaeological Areas Act and secondly through the UK Spatial Planning system under the provisions of the Town and Country Planning Acts. The individual sites within the property are protected as Listed Buildings and Scheduled Ancient Monuments.

Government guidance on protecting the Historic Environment and World Heritage is set out in the National Planning Policy Framework and Circular 07/09. Policies to protect, promote, conserve and enhance World Heritage properties, their settings and buffer zones are also found in statutory planning documents. Policies to ensure this can be found in statutory planning documents, which are reviewed and publicly consulted upon on a regular cycle.

The Mayor's London Plan provides a strategic social, economic, transport and environmental framework for London and its future development over the next 20-25 years and is reviewed regularly. It contains policies to protect and enhance the historic environment, including World Heritage properties. Further guidance is set out in London's World Heritage Sites – Guidance on Setting, and The London View Management Framework Supplementary Planning Guidance provides guidance on the protection of important designated views. It includes 10 views of the Westminster World Heritage property including a view looking from Parliament Square towards the Palace of Westminster.

The City of Westminster also has policies in its Core Strategy to protect the historic environment generally and the property specifically. Its cross cutting policies provide for management of the historic environment and protection of important views, buildings and spaces with particular reference to the Westminster World Heritage property. Although the property is located within the City of Westminster, much of its setting covers adjoining boroughs. The neighbouring Boroughs of Lambeth and Wandsworth also include policies in their Local Plans for the protection of the setting of the Westminster World Heritage property.

Both Westminster Abbey and the Palace of Westminster have Conservation Plans that put in place a comprehensive conservation maintenance regime based on regular inspection programmes. The Westminster World Heritage Site Management Plan was published by the property's Steering Group in 2007. There is no coordinator, and implementation of key objectives is undertaken by the key stakeholders – the Palace of Westminster, Westminster Abbey and Westminster City Council - working within the Steering Group framework.

There are continuing pressures for development and regeneration in the area around the property and permission has been given for tall buildings which could adversely impact on its important views. The guidance set out in the Mayor's Supplementary Planning Guidance

on London's World Heritage Sites – Guidance on Setting, together with the London View Management Framework, English Heritage's Conservation Principles and Seeing the History in the View identify methodologies to which could be used to assess impacts on views and on the setting of the World Heritage property and its Outstanding Universal Value. However, there is no single, specific mechanism in place to protect the setting of the property.

As one of the most famous sites in London and a key tourist attraction, the property receives high numbers of visitors who require proactive management to minimise congestion and careful visitor management to protect the fabric and setting of the property. The protection and enhancement of the public realm and better traffic management, particularly in the quiet spaces adjacent to the property, are also important in protecting its setting.

To address these issues, an overall visitor management strategy and a traffic management strategy are needed to complement the visitor management strategies of the individual stakeholders, together with greater protection of the setting of the property and its key views. Ways in which this can be achieved will be examined in the Management Plan reviews.

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**This document was prepared by Lambeth Council's
Conservation & Urban Design team
August 2014**