

Lambeth LDF Core Strategy Topic Paper 3: Tall Buildings

March 2010

1. Introduction

- 1.1 Lambeth's approach to tall buildings is set out in Core Strategy Policy S9(d) - Quality of the Built Environment.
- 1.2 This topic paper seeks to draw together the information which has influenced the approach to be taken to tall buildings in the Lambeth Core Strategy.

2. Core Strategy approach to tall buildings in Lambeth

National, regional and local policy context

- 2.1 The development of the Core Strategy policy approach to the location and development of tall buildings is founded in the context of the following documents:
 - the London Plan (2008):- Policy 4B.9: Tall Buildings location, Policy 4B.10: Large-scale buildings – design and impact; and Policy 5E.2: Opportunity Areas.
 - the London View Management Framework (LVMF) Supplementary Planning Guidance 2007 and revised LVMF consultation draft 2009;
 - Waterloo Opportunity Area Planning Framework, published by the Greater London Authority in 2007.
 - Draft Vauxhall Nine Elms Battersea Opportunity Area Planning Framework, published by the Greater London Authority in October 2009;
 - the Lambeth Unitary Development Plan (UDP) adopted 2007:- policy 40 Tall Buildings – sets out criteria for the assessment of planning applications for tall buildings;
 - English Heritage and CABE Guidance on Tall Buildings, published in July 2007.

Tall buildings in Lambeth

- 2.2 Para 4.46 of the Lambeth Core Strategy sets out the following definition of tall buildings:

“Tall buildings are defined as over 25 metres adjacent to the River Thames and over 30 metres elsewhere in 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 refusal.”

- 2.3 Policy S9(d) of the Core Strategy identifies the following locations as appropriate for tall buildings:
- Waterloo
 - Vauxhall
 - Brixton
- 2.4 Each of these three locations are key regeneration opportunities but with very different characteristics. Lambeth promotes these locations for high density development because:
- They are town centre locations, consistent with national planning guidance
 - They have very good public transport access
 - They already have a dense pattern of development with taller buildings than other parts of the borough.

Local area studies

- 2.5 The Council commissioned the following pieces of work to provide a more detailed framework for the above three key regeneration areas:

Area	Area Plan	Date of adoption/approval	Consultancy commissioned
Waterloo	Waterloo Supplementary Planning Document	8 June 2009	(Draft SPD by Urban Initiatives)
Vauxhall	Vauxhall Draft Supplementary Planning Document	28 July 2008	BDP
Brixton	Future Brixton Masterplan	27 July 2009	Stock Woolstencroft

- 2.6 Masterplans were also commissioned and prepared for the Streatham and Norwood areas in the south of Lambeth. Within the two town centres there will be opportunities to raise the density of development, but any such proposal will be required to take account of the existing context. The Lambeth Core Strategy (policy S9(d)) does not seek to promote tall building development in these areas.
- 2.7 The preparation of area guidance in Waterloo and Vauxhall has particularly been affected by recent decisions by the Secretary of State on tall building proposals in Lambeth and elsewhere in London. These cases have been the subject of intense scrutiny and are referred to below in the relevant area sections.
- 2.8 All the Lambeth area plans have been the subject of extensive public consultation. The Council's approach to tall buildings in the core strategy has also been the subject of public consultation at the issues and options and draft core strategy stages.
- 2.9 The approach to tall building development in Waterloo, Vauxhall and Brixton is dealt with in more detail in sections 3-5 of this paper. Opportunities for higher density development, in Norwood and Streatham are also promoted to support regeneration of the town centres and this is dealt with in section 6.

- 2.10 Elsewhere in the borough, policy S9 promotes development appropriate to the scale of the surrounding townscape and this will normally preclude tall buildings. In most parts of the borough, the townscape is made up of low rise residential development. There are some areas in Lambeth with residential tower blocks which to some extent will set the context for development, but generally this is not a form of development that the Council is actively seeking to promote.

3. Waterloo

- 3.1 Waterloo is located within central London and includes Waterloo Station, the South Bank arts complex and Lower Marsh district centre. Improvements to transport links, pedestrian routes and facilities on the South Bank have helped establish the area more firmly as a central London location and has spurred significant development interest in recent years. Lambeth Council has sought to further improve the area's public realm and transport, and set out a framework for development in the Waterloo Area SPD (2009) and this SPD has informed Core Strategy Policy PN1 – Waterloo. Policy PN1c restates the potential for a loose cluster of tall buildings at Waterloo station and the immediately adjoining area.

Regional policy

- 3.2 Waterloo is identified in the London Plan as an Opportunity Area (Policy 5E.2) and paragraph 5.140 of the London Plan promotes a cluster of tall buildings on and around the station. The London Plan promotes high density development close to major public transport interchanges and supports growth in the central London economy. Waterloo has exceptional public transport accessibility, and has many redevelopment opportunities that could make more efficient use of land in central London. The potential of the area for tall buildings was set out further in the Mayor of London's Waterloo Opportunity Area Planning Framework (OAPF) (2007).
- *Background documents – London Plan (2008) and Waterloo Opportunity Area Planning Framework (2007).*
- 3.3 The Framework identifies that new development should be principally in the area around and above the Station and along the commercial spine behind the Riverside buildings, consolidating the existing distribution of tall buildings in this area. The Framework identifies that tall buildings in these locations would benefit from Waterloo's excellent high public transport accessibility and promote regeneration. A cluster of tall buildings on and around the station would give greater clarity to its location while the station area is located outside any conservation area and protected vistas of the London View Management Framework.
- 3.4 The Lambeth Unitary Development Plan was adopted in August 2007. It includes criteria based policies on design (policy 33) and tall buildings (policy 40), as well as a series of Waterloo-specific policies (policies 79 to 83) and guidance for sites defined as Major Development Opportunities. Policy 79 of the UDP defined the Waterloo Development Framework Area – consistent with the Opportunity Area designation in the London Plan – where the Council promotes comprehensive regeneration.
- 3.5 Lambeth adopted the Waterloo Area Supplementary Planning Document (SPD) in July 2009, following consultation earlier in 2008. The SPD provides more detailed guidance for the regeneration of the Waterloo area, carrying forward the strategy set out in the OAPF. The SPD sets out the planning constraints in Waterloo and refines the area suitable for tall buildings – namely a loose cluster around Waterloo Station, outside the strategic views safeguarded in the Mayor's London View Management Framework. The adjacent London Borough of Southwark were involved in early stages of the Waterloo Area SPD, and Lambeth officers have been consulted on emerging work on tall buildings in Southwark on Bankside.

- *Background documents – London View Management Framework (2007) and Waterloo Area Supplementary Planning Document (2009).*

3.6 The SPD sets out an urban design framework for Waterloo providing general development and public realm guidance. The SPD identifies areas which are appropriate, sensitive or inappropriate for tall buildings taking account of Waterloo's existing character, its heritage and important views that cross the area. It considers the heritage and character assets of Waterloo and provides guidance as to where protection of those assets creates the greatest constraints for building tall. The final version of the SPD was restructured to more closely follow the English Heritage and CABI Tall Buildings Guidance (2007) and set out more clearly how constraints and protection of heritage assets lead to the identification of areas appropriate, sensitive or inappropriate for tall building development.

Evidence base

3.7 The consultancy Urban Initiatives carried out a development capacity study of Waterloo as the basis for the Waterloo Area SPD. This work modelled options for achieving the development estimates for the Waterloo Opportunity Area set out in the London Plan. The modelling considered what scale of development would be needed, what form this might take and how this would fit with the various designations in the area. The London Plan envisages significant new development at Waterloo, and Urban Initiatives' work found that this could be achieved with a cluster of tall buildings around the station.

- *Background document – Urban Initiatives Waterloo Area Development Capacity Study, 2007.*

3.8 The development capacity work established the scale of development that could be accommodated in a cluster around Waterloo within the context of existing designations ie outside protected LVMF views and conservation areas. This approach was taken forward in the consultation draft version of the Waterloo Area SPD. The adopted version of the SPD set out Lambeth's support for tall buildings around the station, but set out more clearly the various overlapping designations in Waterloo in line with English Heritage and CABI guidance. In this way, the SPD makes clear those parts of Waterloo that are sensitive to tall building development based on various constraints such as strategic views and conservation areas. The SPD also indicates areas that are outside of these constraints where tall building development could be an appropriate design response.

3.9 An alternative option of achieving the same level of development with lower rise buildings was considered but did not deliver the same quantity of development, particularly in terms of employment floorspace. Consultation on the draft SPD showed some local concern that higher density development in Waterloo should not create lower rise bulky buildings, and that tall buildings could have greater potential to create space at street level – both to provide more space for pedestrian circulation and to provide open amenity space.

- *Background document – Waterloo Area SPD Consultation Report, Lambeth Council, July 2009.*

3.10 Preparation of the SPD took into account decisions on two major developments in Waterloo:

- Doon St – a mixed use leisure, community and residential development proposal including a 143metre, 43 storey residential tower. The planning application was approved by Lambeth Council in 2007 but the application was called in by the Secretary of State. Key considerations were the impact on the setting of the Grade I listed Somerset House and views from St.James' Park, both on the north bank of the River Thames. The Secretary of State approved the scheme in 2008. (The decision has been challenged in the High Court but has thus far been upheld).
- Elizabeth House – redevelopment of office buildings adjacent to the station to provide three separate towers of 22, 28 and 33 storeys. Although approved by Lambeth in 2008, the scheme was called in and rejected by the Secretary of State in 2009 (after adoption of the SPD) on design grounds and impact on the setting of the Westminster World Heritage Site. The principle of a cluster of tall buildings around Waterloo Station was however endorsed in the Secretary of State's decision letter.

3.11 In preparing the draft version of the SPD, the consultants and Lambeth met with the major landowners in Waterloo to discuss their development aspirations. The SPD process has been an opportunity to draw these proposals together as part of an area plan and to consult with community groups and residents. Extensive involvement in the consultation process means that there is now for the first time general agreement on the area's priorities and how the various developments and projects should fit together.

- *Background document – Waterloo Area SPD Consultation Report, Lambeth Council, July 2009.*

3.12 The SPD gives an indication of where tall buildings are appropriate, but does not set specific sites or heights, allowing flexibility for developers to provide the appropriate design response. There are a number of emerging tall building proposals that fit within this planning framework, and although timing of construction will be affected by market conditions, the proposals are realistic in reflecting local development interest. The development estimates of the London Plan have been carried through to the Core Strategy and progress will be measured by the number of new homes and the amount of new employment floorspace.

4. Vauxhall

- 4.1 Vauxhall is on the southern edge of Central London, with excellent public transport connections to the rest of London. There are already some tall buildings in the area of between 15 and 20 storeys such as Market Towers, Keybridge House and St. George Wharf. However, Vauxhall tends to be considered on the margins of the central London property market leading to piecemeal development and in turn a poor quality, disconnected physical environment lacking a clear sense of place. The area is bisected by a railway viaduct, and this disconnection is compounded by a major gyratory road system.
- 4.2 The area, together with the rest of the Vauxhall Nine Elms Battersea (VNEB) Opportunity Area in Wandsworth, represents a major regeneration opportunity for London, given its position by the Thames and on the edge of central London. There are many underused sites which would benefit from development and Vauxhall has excellent public transport accessibility. Lambeth has set out a framework for development in the draft Vauxhall SPD (2008) and this SPD has informed Core Strategy Policy PN2 – Vauxhall. Part of Policy PN2 states the Council's support for
- “opportunities for the development of a cluster of high quality taller buildings for a mix of uses including residential, retail, business and other commercial and community uses at Vauxhall Heart which could extend into Wandsworth, focused on the transport interchange at Vauxhall Cross with connections to the Nine Elms area and residential hinterland and new pedestrian linkages through the railway viaduct.”*

Regional policy

- 4.3 Vauxhall is identified in the London Plan as part of the Vauxhall/Nine Elms/Battersea Opportunity Area (policy 5E.2). Vauxhall is in Lambeth but the majority of the Opportunity Area, Nine Elms and Battersea including the Power Station, is to the west in the London Borough of Wandsworth.
- *Background document – London Plan (2008)*
- 4.4 Paragraph 5.141 of the London Plan promotes tall buildings on appropriate parts of the Opportunity Area. The London Plan in identifying Vauxhall, Nine Elms and Battersea as an area of intensification notes “good quality tall buildings in appropriate parts of the area will reduce its perceived isolation, clearly signposting its transformation as an Opportunity Area”.

Vauxhall/Nine Elms/Battersea Opportunity Area Planning Framework (VNEB OAPF)

- 4.5 The GLA has been collaborating with the London Borough of Wandsworth, Lambeth and Transport for London in preparing guidance for the whole Opportunity Area, as well as with landowners and key stakeholders. This incorporates work and the principles from Lambeth's Vauxhall Area Supplementary Planning Document, in particular in promoting Vauxhall as the location for a cluster of tall buildings. The draft VNEB OAPF was published for consultation in November 2009 with the consultation period lasting until March 2010.
- *Background document - Draft Vauxhall Nine Elms Battersea Opportunity Area Planning Framework (VNEB OAPF) 2009.*

- 4.6 Preparation of the OAPF involved extensive modelling of the scope for tall buildings in the Opportunity Area as a whole within the context of the draft revised LVMF. In order to keep within LVMF constraints, the OAPF promotes only low to medium rise development in Nine Elms to protect the backdrop of views of the Palace of Westminster, while promoting a cluster of tall buildings in Vauxhall, away from LVMF viewing corridors.
- 4.7 Most of the Opportunity Area is poorly served by public transport and although the OAPF promotes new public transport provision, including a new Underground line, the area currently relies on Vauxhall station for interchange with mainline rail and Underground services. With excellent public transport accessibility, Vauxhall has the necessary public transport infrastructure to serve a cluster of tall buildings.

Vauxhall Area Supplementary Planning Document (SPD)

- 4.8 Lambeth developed its approach to tall buildings at Vauxhall through an urban design study carried out by consultants BDP. This study was taken forward in the preparation of the draft Vauxhall Area SPD which was the subject of public consultation in November/December 2008.
- *Background document – Draft Vauxhall Area Supplementary Planning Document (2008).*
- 4.9 The BDP study modelled options for achieving the development estimates for the Opportunity Area set out in the London Plan. The modelling considered what scale of development would be needed, what form this might take and how this would fit with the various designations in the area, including views in the London View Management Framework.
- 4.10 From this work, the draft SPD set out three development options for Vauxhall and these have been refined as part of work on the OAPF during 2009 which has provided more up to date information on infrastructure provision.
- 4.11 The published draft Vauxhall Area SPD breaks Vauxhall down into four quarters or character areas and applies a hierarchy for the location of tall buildings. At the Vauxhall Heart, around the existing Vauxhall interchange, intensification will be supported with a cluster of tall buildings which will benefit the greatest from transport accessibility. New buildings in the Albert Embankment and Riverside area would create variation in the roofline with minor undulations while ensuring development does not significantly exceed the height of existing buildings. Therefore there would be a stepping down of heights from Vauxhall Heart to areas including Albert Embankment in accordance with the LVMF.
- 4.12 Both the Vauxhall SPD and the OAPF have taken into account recent planning applications and decisions by the Secretary of State. Key schemes that have affected the strategic approach are:
- Vauxhall Tower – 181m residential tower, the last phase of St. George Wharf. Planning permission was refused by Lambeth Council in 2002 but on appeal the scheme was approved by the Secretary of State in 2005. Concerns included the impact on the setting of the Westminster World Heritage Site, impact on the setting of conservation areas and insufficient affordable housing.

- Sky Gardens, 143-161 Wandsworth Road - 130m mixed use tower granted planning permission by Lambeth in 2008.
- Hampton House, 20 Albert Embankment – mixed use scheme of 3 towers, the tallest being 85 metres, approved by Lambeth Council in 2008
- 81, Black Prince Road – a mixed use tower of 24 storeys, planning permission was refused by Lambeth Council in February 2009 due to concerns about potential harm to the setting of the Westminster World Heritage Site, but the scheme was allowed by the Planning Inspectorate on appeal in 2009.

5. Brixton

- 5.1 Brixton is located at the heart of Lambeth, and being at the end of the Victoria line, is an important interchange between the Underground network and bus routes that serve the south of the borough. Most of the town centre is included in the Brixton Conservation Area.
- 5.2 The Council aims to regenerate the town centre by promoting opportunities for mixed use development to create new retail and employment floorspace as part of residential schemes. There is a need for further investment in improving the overground station and improving pedestrian links and spaces. Brixton also has an important cultural role and the Council is keen to reinforce this role by supporting new sports and cultural facilities. These aspirations are set out in the Future Brixton Master Plan 2009 and the master plan has formed part of the evidence base in the preparation of Core Strategy Policy PN3 - Brixton.

Regional policy

- 5.3 Brixton is identified in the London Plan (Annex 1) and the Lambeth Core Strategy as a Major Town Centre. Brixton is on the Victoria Line, has an overground station and is a hub for many bus services. As a result it is very well served by public transport. The London Plan promotes high density development close to public transport interchanges and Brixton is promoted in the London Plan as part of an area for regeneration where the Mayor will prioritise action and investment for renewal (policy 2A.7). Lambeth Council is also keen to promote regeneration of the town centre through development of the various development sites and improvements to pedestrian routes.
- *Background document – London Plan (2008).*

Brixton Master Plan

- 5.4 In order to set out a more detailed and coherent strategy for the regeneration of Brixton, the Council commissioned the consultants Stock Woolstencroft to prepare a master plan for the town centre. There was extensive public consultation to discuss the general approach and detailed site proposals. The consultation included various community groups in Brixton and owners and prospective developers of key sites. Work began on the masterplan in 2007 and it was approved by Lambeth Cabinet in July 2009.
- *Background document – Future Brixton Master Plan (2009).*
- 5.5 The master plan identifies land at the core of the town centre as being appropriate for intensification with the potential for higher density development of more than 10 floors. This land is identified as Brixton Central East in the Brixton Master Plan, focused on the overground station and including land between Brixton Station Road, Popes Road, Electric Lane north and Coldharbour Lane. Higher density development here has the potential to enable improvements to the station interchange and the creation of new routes and spaces. The northern part of this land already includes a 12 storey building (International House, Popes Road) and other large scale post war buildings such as the Brixton Rec and the Popes Road Car Park. Development of the southern part of the land will need to have regard to the setting of the Brixton Conservation Area, but will be screened to an extent by a high level railway viaduct.

- 5.6 The master plan identifies a second part of Brixton as being appropriate for higher density development of more than 10 floors – land between Brixton Hill and Acre Lane, behind the Town Hall. However, in practice this is a challenging location for tall buildings as it is constrained by the setting of listed buildings, in particular the listed Town Hall, the setting of conservation areas and existing low rise housing within and around the land.

Evidence base

- 5.7 The master plan is based on an urban design study by Stock Woolstencroft who were commissioned by Lambeth in 2006. Stock Woolstencroft and the Council undertook consultation with landowners and stakeholders over a two year period as part of preparing the master plan. Stock Woolstencroft also appraised the viability of site specific proposals within the master plan.
- 5.8 The Council consulted on various iterations of the master plan which set out options for development including higher densities of development and more extensive redevelopment of sites within the conservation areas, in particular parts of the market. In response to community concerns, the final version of the master plan identified the proposed two key parts of the town centre for high density development, with other parts of the town centre being developed more incrementally and in keeping with the existing context. There is general support for this conservation-led approach which focuses regeneration and investment on outdated buildings that harm the appearance of Brixton.
- 5.9 In the case of the Brixton Central East area, around the overground station and Popes Road, there is a need to improve safety, reconnect routes and generally improve public realm for the benefit of the whole town centre. Both this site and the Town Hall area offer significant regeneration opportunities with the potential to bring a concentration of new investment and facilities for Brixton. Tall building development would bring more activity to the town centre and by, raising density on parts of the Brixton Central East area, enable lower density and new public areas to be created on other parts, such as between the viaducts. Supplementary Planning Documents will be prepared in 2010/11 to consider in more detail the appropriate scale and form of development for each of these areas.
- 5.10 Preparation of the master plan involved many discussions with landowners and prospective developers. Although the development market is not as strong in Brixton as it is in north Lambeth, the master plan is stimulating interest in investment from the London Development Agency, the Heritage Lottery Fund and local landowners. The master plan includes various smaller scale projects that can be implemented over time and add to the improvements recently carried out to Brixton Road and the Central Square.

6. Streatham and West Norwood

- 6.1 The Core Strategy promotes “taller” buildings in West Norwood and Streatham – the two main town centres for the south of the borough. Lambeth commissioned EDAW to prepare masterplans for each of the town centres in order to consider and identify opportunities to regenerate the town centres:
- West Norwood Masterplan 2009
 - Streatham Masterplan 2009
- 6.2 The masterplans included detailed appraisal of opportunities for development in the town centres, urban design analysis and viability assessment, and involved extensive public consultation.
- 6.3 The masterplans are part of the core strategy evidence base and the proposals have been carried forward into the Core Strategy policies PN4 Streatham and PN8 West Norwood and included in the planning consultation on the core strategy.
- 6.4 All development proposals for taller buildings in these areas would be subject to the policy guidance in Policy S9 (d) which states that tall buildings will be supported where they are an appropriate development form for the area, particularly where this contributes to area regeneration and local distinctiveness, makes the most effective use of land and is consistent with national and London Plan policies and guidance.
- 6.5 Lambeth intends to promote opportunities for higher density development to support regeneration in Norwood and Streatham, but within the existing built context. The Council is not seeking to promote the large scale developments and tall buildings envisaged for Waterloo, Vauxhall and Brixton.

Streatham

- 6.6 Streatham is a major town centre and Policy PN4 of the Core Strategy states the Council’s support for Streatham’s regeneration as a retail destination. The approach to development is put in the context of its status as a conservation area. Also Streatham town centre is extremely lengthy and there is strong benefit in defining and breaking down its character in a specific way in particular by seeking the opportunities provided at its northern and southernmost ends through gateway developments at Streatham Hill and Streatham Hub respectively. Character areas have therefore been defined through the masterplan work to enhance the distinctiveness of the different parts and roles of the centre.
- 6.7 The policy states that regeneration and development should be sensitive to the centre’s conservation area status and heritage assets but, from work on the Streatham Masterplan, the Council considers that there are opportunities for higher density development and some taller buildings:
- PN4 (a) Streatham Hill – this part of Streatham has larger scale buildings than the rest of the centre, generally of two to five storeys. The Core Strategy seeks to promote taller landmark buildings of four storeys or more where the scale and form are appropriate to the location to create a focus of activity at this end of the centre.

- PN4 (b) Streatham Central – this part of Streatham High Road is entirely within the Streatham Conservation Area, with most buildings being of three to four storeys. There is some post-war development of up to 6 storeys which may at some point be suitable for redevelopment at a similar scale.
- PN4 (c) Streatham Village – the Core Strategy promotes a landmark destination use, such as retail and community use. This part of Streatham is within the Streatham Conservation Area and any proposals for development would need to comply with Policy S9 (b) on conservation.
- PN4 (d) Streatham Hub – land south of Streatham Station, currently in low density development of one to four storeys in a mix of uses. There is an approved scheme for higher density development up to four storeys, to provide a superstore, a leisure centre and housing.

West Norwood

6.8 In West Norwood, policy PN8 promotes taller buildings of high quality to act as focal points or destinations at certain locations within the centre. West Norwood is a District Centre with some existing 4 storey development along Norwood Road, and in this context “taller” development is defined in policy PN8 as 4 – 6 storeys. Three particular opportunities for taller buildings are set out in policy PN8:

- PN8 (a) West Norwood Town Centre Opportunity Site – an opportunity for development of between four and six storeys. The Council has carried out a detailed assessment of the potential of the site, including urban design analysis by consultants DTZ. This work is included in the West Norwood MDO38 Development Brief, adopted by the Council in 2007, and carried forward in the Council’s West Norwood Masterplan 2009.
- PN8 (b) West Norwood Commercial Area – opportunities on key gateway sites for development of 4-6 storeys. The area is one of Lambeth’s main employment and industrial areas, with existing development generally of two to three storeys, and it suffers from poor environmental and townscape quality without much quality in the urban fabric. Redevelopment to higher densities is seen as a way to boost investment in the area and raise environmental quality.
- PN8 (c) Library and Norwood Hall – scope for a landmark building to accommodate a new or refurbished theatre and library, but scale would need to be similar to existing in order to protect the setting of the listed cemetery and its many listed buildings.
- PN8 (d) Tulse Hill – opportunities for taller landmark buildings of between four and six storeys around the station, to mark the start of the town centre, but these should respect the heritage of the town centre in scale and design. Existing development in this part of the town centre is generally of 3 storeys.