

Waterloo

Building Height Study, 2018



1. Introduction

1.1 This study has been undertaken to inform Lambeth's approach to tall buildings in Waterloo as part of the Lambeth Local Plan Review, 2018.

2. Background

The Waterloo Opportunity Area

2.1 The London Plan identifies Waterloo as an Opportunity Area and the objectives are outlined in the Mayor's Waterloo Opportunity Area Planning Framework (2007) which include:

'Development potential in the area should be maximised given Waterloo's status as an opportunity Area and its location within the Central Activities Zone and to accord with the strategy of providing the highest levels of activity at locations with the greatest transport capacity'.

2.2 The OAPF identified two broad areas suitable for tall building – above and around the station and on the commercial spine behind the Riverside (Belvedere Road and Upper Ground) – based in part on the presence of tall buildings in these locations already. The associated illustrations generally show a cluster of tall buildings over Waterloo Station which would be delivered as part of a station redevelopment which would push the passenger concourse to ground level allowing the platforms to be extended.

2.3 The OAPF recognises the need for development to respond to this sensitive context:

'Additionally, development potential has to be tempered against the normal impacts of development assessed by the planning system including the impact on character areas and on local and strategic views'. (OAPF page 99).

2.4 Figure 49 identifies five areas of possible development within and around the railway station:

1. Elizabeth House and surrounds,
2. Above and within Waterloo Station,
3. York Road (Beckett House, Stangate House, Canterbury House),
4. Spur Road; and
5. North Eastern Corner.

2.5 The OAPF (page 113) advises that the tallest buildings should be placed along the northern section of areas 1 and 2. This equates with the existing Elizabeth House building and the northern perimeter of the station including where the station meets Waterloo Road *'where the scale of spaces and buildings allow and where important views are respected'* (p113).

2.6 Further specific advice is provided for each of the five areas:

1. Elizabeth House and surrounds	Where the highest buildings could be provided to accommodate uses including offices, residential and retail.
2. Above and within Waterloo Station	

3. York Road (southern areas)	Needs to respect local views of County Hall and Victoria Embankment River Prospect
4. Spur Road	New retail uses and a frontage between Lower Marsh and station
5. North Eastern Corner	An opportunity for taller building to realise a clearer relationship between the station, Lower Marsh and Waterloo Road / Lower Marsh / Baylis Road junction.

2.7 Page 114 of the OAPF states that:

'Additionally, any development would need to take into account the area's heritage assets and their settings including listed buildings and conservation areas, archaeology and historic parks and gardens. The impact on views and the Westminster World Heritage Site would also need to be taken into account. Further detailed guidance for the potential locations for tall buildings will be provided by a Waterloo Development Capacity Study'.

3. Current Considerations

3.1 The schematic nature of the SPD map reproduced in Annex 11 of the Lambeth Local Plan (2015) has been revisited to address inaccuracies. This is important because the current Annex 11 map inappropriately cuts the Waterloo Conservation Area in two – suggesting the eastern part is inappropriate for tall buildings and the western part sensitive to tall buildings. That assumption is flawed – the whole of the conservation area is not considered appropriate for tall building development. It has been omitted for that reason.

3.2 In selecting the sites a number have been discounted. For example the buildings lining the north side of Stamford Street have been omitted because tall building development here would have an unacceptable impact on the setting of the Waterloo Conservation Area and the listed buildings lining Stamford Street. The Whitehouse Apartments, Belvedere Road have been discounted because they are locally listed and deemed to make a positive contribution to the character and appearance of the Southbank Conservation Area. The former general Lying in Hospital, York Road is also discounted because it is grade II listed.

3.3 As a result of that analysis above the following Waterloo sites are considered suitable for more detailed consideration for tall building development:

Address

- Site 1 ITV, Upper Ground
- Site 2 Doon Street
- Site 3 IMAX, Waterloo Road
- Site 4 Elizabeth House, York Road
- Site 5 Waterloo Station, Waterloo Road
- Site 6 99 – 119 Waterloo Road
- Site 7 Beckett House, Lambeth Palace Road
- Site 8 Stangate House and Canterbury House, Royal Street

3.4 Since the designation of the Waterloo as an Opportunity Area there have been three UNESCO sponsored missions to the Westminster World Heritage Site (2007, 2011 and

2017). One of the key UNESCO concerns has been the impact of tall building development on the Outstanding Universal Value of the World Heritage Site.

3.5 One request from UNESCO following the 2011 Mission was that more work be undertaken to better understand the immediate and wider setting of the World Heritage Site. Lambeth began work in this area in 2016. As the work has progressed it has been shared with the WHS Steering Group and key stakeholders - Westminster City Council, Historic England, LB Southwark and LB Wandsworth have been involved in workshops and briefings. The work in progress was also shared with the 2017 ICOMOS Mission.

3.6 The first step was the defining and subsequent mapping of an 'immediate setting' to the WHS within Lambeth. The immediate setting is defined as any publically accessible place within Lambeth (including the River Thames) where the viewer can gain a visual appreciation of the WHS. A computer generated 'visibility map' prepared by Miller Hare formed the basis of the subsequent field work on the Lambeth side which resulted in the mapping of an area of Lambeth as the 'immediate setting' of the WWHS in Lambeth - essentially the space in the foreground of the WHS (between it and the viewer) forms the 'immediate setting'. The backdrop behind the World Heritage Site in these views is becomes the 'wider setting'. In Lambeth's case in views towards the WWHS the wider setting generally falls within the City of Westminster (views west from Waterloo) and Camden (views north from Vauxhall). In Westminster's case the wider setting (views east) generally falls within Lambeth and Southwark.

3.7 As a next stage, to inform building height assessment in Lambeth, consultants Miller Hare were asked to explore existing height constraints covering the wider setting of the WWHS. The work has been 3d model based and has taken the form of workshops with the Miller Hare which have involved stakeholders such as Historic England and City of Westminster. That work resulted in '**Westminster World Heritage Site Setting Study, 2018**'. The general findings were as follows:

3.8 The London View Management Framework already imposes strict building height restrictions through its 'protected silhouettes' designation for the Westminster World Heritage Site. The LVMF directs that any development exceeding these height limits should be refused. When these fixed views constraints were added to the 3D model it effectively showed that whilst the areas impacted by the protected silhouettes were significant (especially over the City of Westminster and Camden), no protected silhouettes constrain building heights in the heart of Waterloo where a cluster of tall buildings already exists and where more buildings are anticipated.

3.9 As a starting point to identify appropriate general building heights for Waterloo a series of reasonable additional planning constraints placed into the 3D model. These were based on LVMF guidance where relevant for other protected views and on a starting point that the settings of high status heritage assets (World Heritage Site / Palace of Westminster, The County Hall, The Foreign Office and Somerset House) should be respected. These considerations were then modelled in 3D by Miller Hare. The result is a series of maximum heights up to which technically, no harm should result to the setting of the Westminster World Heritage Site, Strategic views and the settings of important heritage assets (Somerset House, Royal Festival Hall, County Hall etc.). This has allowed the identification of a maximum building height for each site. See Map 1 in Appendix 1. It should be noted though that these are not exact but fall within a series of 10m increments. For example a maximum height of 101m would fall within the range 100-110m. Thus the height ranges identified by Miller Hare were used as the starting point for more detailed site-specific impact assessment for each of the eight sites in order to refine the heights to address more localised considerations.

4. Assessment Methodology

4.1 A series of viewpoints were identified from which the impacts of the maximum heights could be assessed. The viewpoints have been selected to be either heritage sensitive locations or locations within the local townscape where the viewer would get a good appreciation of the proposal. The twenty four selected view locations are:

View	Reason
LVMF View 18B1	A key LVMF view towards Southbank from Westminster Bridge
LVMF View 19A.1	A key LVMF view towards from Lambeth Bridge
LVMF View 20B.1	A key LVMF view towards Southbank from Victoria Embankment.
LVMF View 27A.1	A key LVMF view towards Elizabeth Tower from Parliament Square
LVMF View 27B.1	A key LVMF view towards Elizabeth Tower from Parliament Square
Archbishops Park (S end)	A popular location looking north towards a number of subject sites.
Archbishops Park (N end)	A popular location looking north towards a number of subject sites.
Baylis Road at junction with Lower Marsh	A good location looking on a main route northwards towards two subject sites on a prominent junction.
Lower Marsh at Baylis Road	A heritage sensitive street looking south towards a number of subject sites.
Lower marsh at Frazier Street	A heritage sensitive street looking south towards a number of subject sites.
Queens Walk looking towards Upper Ground	A prominent location looking southwards towards one subject site.
Stamford Street at Broadwall	A good location on a main approach route where the view south west aligns towards a number of subject sites.
Surrey Street	A good location looking southwards towards one subject site.
Theed Street	A heritage sensitive street in which views west terminate on a number of subject sites.
Victoria Embankment near Temple Station	A good location on Victoria Embankment where the view south captures a number of subject sites and the wider South Bank.
Victoria Tower Gardens	A riverside garden looking towards a number of subject sites.
Waterloo Bridge on the borough boundary	A good location on a main approach route into Waterloo from City of Westminster. This view south faces towards a number of subject sites.
Waterloo Bridge at Somerset House	Similar to the other Waterloo Bridge view but at a location where the public enter and exit from Somerset House.
Waterloo Road at Morley Street	A good location on a main approach route where the view north aligns towards a number

	of subject sites. This location is also the borough boundary with Southwark.
Waterloo Road at Old Vic	A good location on a main approach route where the view north west aligns towards a number of subject sites.
Waterloo Road at Stamford Street	A good location to view Waterloo Station.
5 Whitcote Street	A busy location looking northwards towards a number of subject sites.
Whittlesey Street	A heritage sensitive street in which views west terminate on a number of subject sites.
York Road at County Hall N Block	A good location on a main route where the view north east aligns towards a number of subject sites.

4.2 It should be noted that only view locations relevant to a particular subject site have been modelled for that site.

5. Visual Impact Assessment

5.1 The landscape Institute's *Guidance on Landscape and Visual Impact Assessment* provides advice on good practice and is applicable to all forms of landscape, including urban townscape. Its methodology is not prescriptive in that it does not provide a detailed universal methodology that can be followed in every situation (Ref 1-1, para 1.20); the assessment should be tailored to the particular circumstances in each case with an approach that is in proportion to the project scale. The guidance recognises that much of the assessment must rely on professional judgement.

5.2 The views were photographed taken in August / September 2018 when trees are in full leaf. In winter leaf cover is reduced and thus visibility can be increased. It is worth also noting the limitations of the VU City model with regard to trees; as a general point the trees in the model are less substantial than in reality. When considering trees it is better therefore to rely on the photographs and not on the model.

5.3 Views are often experienced kinetically and this aspect of the viewing experience is also considered. Some views may collectively represent a sequential experience.

5.4 The baseline characteristics of each view and the contributions of townscape character and heritage assets to the view were considered when views were being identified. View locations have been identified to optimise visibility for assessment purposes. The models assessed in VUCity were built in-house in accordance with VU City requirements.

5.5 *The LVMF SPG* identifies and sets out policy to protect London's strategic views and provides guidance assessment of the designated views. *Seeing the History in the View* provides a methodology for identifying heritage significance within views and assessing how development may affect heritage significance in views.

5.6 HE Guidance *The Setting of Heritage Assets* advises on change management affecting heritage assets. It sets out a number of steps to be followed when assessing potential effects on the significance of heritage assets through changes to their setting. *Tall Buildings: Historic England Advice Note 4* is relevant to tall building development proposals in particular and provides criteria by which to consider whether a tall building is well-sited and well-designed, particularly in relation to townscape and heritage impacts and effects. It states that:

“In the right place well-designed tall buildings can make a positive contribution to urban life” [...] and that “if the building is not in the right place and well designed a tall building, by virtue of its size and widespread visibility, can also seriously harm the qualities that people value about a place [...]” (p.2).

5.7 ICOMOS *Guidance on Heritage Impacts Assessments* sets out an approach to consideration of potential effects on the OUV of a WHS which can be employed universally and which can also be applied to the assessment of effects on the significance of other heritage assets. It sets out terms and criteria for assessment, employing word scales for considering the value of the asset, the scale of impacts and the significance of the effect and advice on the mitigation of effects.

5.8 The following format has been applied to each view:

- A. **Existing** – the view as it exists currently. This ‘receptor sensitivity’ is given a value;
- B. **Proposed** – with the proposed development inserted. The ‘magnitude of change’ is given a value; and
- C. **Cumulative** – with the proposed development together with other similar proposed or significant consented schemes. Here too the cumulative ‘magnitude of change’ is given a value.

5.9 Consideration of the ‘sensitivity of the view’ and the ‘magnitude of impact’ results in a conclusion on the likely ‘significance of effects’.

Receptor Sensitivity

5.10 The categories and criteria are set out below:

- A. **Very high** Strong townscape structure or view composition with distinctive features and buildings worthy of conservation, exhibiting unity, richness and harmony, no detracting features, and a strong sense of place. Likely to be internationally or nationally recognised, e.g. a WHS, a group of Grade I or II* Listed Buildings or a Grade I or II* registered historic park or garden. A Grade I or II* Listed Building which has a generally complimentary, high quality and/or low scale setting.
- B. **High** Strong townscape structure or view composition with distinctive features and buildings worthy of conservation, strong sense of place, only occasional detracting features. The townscape or view is likely to be of importance at the county, borough or regional level and contain features of national importance, e.g. a Grade II* or Grade II Registered historic park or garden, a conservation area townscape of quality and/or a high proportion of Listed Buildings. A Grade I or II* listed building with a mixed quality and/or large scale character setting. A Grade II Listed Building or a conservation area and which has a generally complimentary, high quality and/or low scale setting.
- C. **Moderate** Recognisable townscape structure or view composition, some features and buildings worthy of conservation, some detracting features, recognisable sense of place. May include a assets on the local heritage list, conservation area or groups of Grade II listed. An undesignated heritage asset which may be Locally Listed or a positive contributor within a Conservation Area. A Grade II listed building or a

conservation area which has a mixed character or quality setting and/or tall buildings and modern development visible within its setting.

- D. Low** Distinguishable townscape structure, ordinary townscape conservation, prominent detracting features. Built form or landscape with no heritage value. A designated or undesignated heritage asset which has a low quality and/or highly urban setting in which tall or large scale development predominates.
- E. Negligible Weak** or disjointed townscape structure or view, with frequent discordant and detracting features. Built form or landscape with no heritage value and which detracts from the townscape, landscape or views.

Magnitude of Impact

5.11 The criteria for determining the magnitude of impact is set out below:

Magnitude Criteria

Large	When the degree of change is highly visible and substantially alters part of a TCA, heritage asset or setting or view.
Medium	When the degree of change is clearly visible and moderately alters part of a TCA, heritage asset or setting or view.
Small	When the degree of change is slightly visible and results in a minor change to part of a TCA, heritage asset or setting or view.
Negligible	When the degree of change is very minor and the TCA, heritage asset or setting or view overall appears to be unaffected.

Significance of Effect

5.12 The 'receptor sensitivity' of each view is considered in conjunction with the 'magnitude of the impact' in order to determine the 'significance of the effect' using the table below:

Receptor Sensitivity	Magnitude of change / impact			
	Large	Medium	Small	Negligible
Very High	Major	Major	Major / moderate	Minor / negligible
High	Major	Major / moderate	Moderate / minor	
Moderate	Major	moderate	Minor	negligible
Low	Moderate / minor	minor	minor	negligible
Negligible	negligible	negligible	negligible	negligible

CONCLUSIONS

The detailed analysis for each site is set out in Appendix 2. The objective has been to identify general heights which are achievable without resultant harm to views or the settings of heritage assets. In the absence of detailed proposals the modelling has not been rudimentary and assessment not as exhaustive as it would be for real proposals. Therefore it must be accepted that developers coming forward with real schemes will still be required to submit their own comprehensive impacts modelling to support their applications.

The conclusions of the Appendix 2 analysis are set out below. These results are also mapped in Appendix 3.

Site 1 – ITV, Upper Ground

This existing tall building site sits separate from the established cluster of tall buildings at York Road / Waterloo Road. It is prominently located on the river frontage near the Blackfriars Road cluster.

The Miller Hare modelling identified a maximum height somewhere within the range of 100-110m AOD. This was generated by the height constraint generated by keeping development out of the view from the courtyard of Somerset House. Extensive testing for a tall building was undertaken for the recent approval and that resulted in a replacement tower at 108m AOD which had very slight visibility from within the courtyard of Somerset House. Given the amount of modelling already undertaken and the approved height aligning with the height identified by Miller Hare no further modelling has been undertaken. To avoid visibility from Somerset House the height has been capped at the lower end of the Miller Hare height range.

Recommended general height: 100 - 105m AOD max.

Site 2 – Doon Street, Upper Ground

This site sits a little separate from the established cluster of tall buildings at York Road / Waterloo Road. Presently undeveloped, it is set back behind river frontage at the rear of the National Theatre and is visible in river views. A 2005 approval (05/03498/FUL) had a tower 144m AOD.

The Miller Hare modelling identified a maximum height range of somewhere between 110m and 120m AOD (stepped up at south). This was generated by the height constraint generated by keeping development out of the view from the courtyard of Somerset House. A stepped model of 110m and 120 AOD was tested in nine locations. The proposal is considered to sit comfortably in the views assessed – appearing as part of the anticipated cluster.

Recommended general height: 110m AOD max.

Site 3 – IMAX, Waterloo Road

This site is only currently accessible via pedestrian under crofts. However, proposals to better connect this site to Waterloo are well advanced and will bring with it opportunity to optimise its development opportunity.

The site benefits from being screened by Southbank Place / Shell Centre in views from the Westminster World Heritage Site. As a result the Miller Hare modelling identified a maximum height range of somewhere between 120m and 130m AOD. For modelling purposes the drum of the existing IMAX building has been extruded (as the presumed maximum building envelope) to a height of 130m AOD. Ten viewpoints have been assessed. The proposal is considered to sit comfortably in the views assessed – appearing as the centre of the anticipated cluster and announcing the cluster on the approach south into Waterloo across Waterloo Bridge.

Recommended general height: 110m AOD max.

Site 4 - Elizabeth House, York Road

This existing tall building site sits at the heart of the established cluster of tall buildings at York Road and immediately adjoins Southbank Place. The current approved scheme reaches a height 123m AOD (northern end)) and 53m AOD (southern block). Miller Hare has included the approved scheme in its modelling in views from the Westminster World Heritage Site.

Given the amount of detailed modelling undertaken already for the approved scheme no further modelling has been undertaken.

Recommended general height: 125m AOD (north) - 55m AOD (south).

Site 5 – Waterloo Station

The station platforms cover a large area in the centre of Waterloo with the station buildings lining the northern end of the site. The Miller Hare modelling presumption against development here appearing in views from the Westminster World Heritage Site or rising up in the backdrop of County Hall in views from Victoria Embankment has limited the opportunity for height to the northern end of the site. A max height range here somewhere between 80-90m AOD has been identified by Miller Hare.

The Victory Arch, being grade II listed, has been discounted as a development opportunity within the station and out of respect for its setting the footprint of the subject model extrusion for the site has been pulled away from it. These considerations have resulted in a model being prepared which aligns with Waterloo Road and Mephram Street frontages.

Initial modelling at 90m indicated visibility from Parliament Square which was not considered acceptable in terms of the setting of the Westminster World Heritage Site. Therefore the model was amended to 70m AOD to remove all visibility in these views.

Whilst the height itself is considered comfortable in the modelled views, the full extrusion of the site at 70m AOD is problematic in terms of its bulk in a number of the assessed views. It is therefore essential that any tall building development coming forward is broken down into individual elements with the tall buildings well-spaced in order to avoid an overbearing mass or excessive sense of enclosure to Waterloo Road.

Recommended general height: 70m AOD (max) well-spaced for good townscape.

Site 6 – 99 – 119 Waterloo Road

Two existing tall buildings stand immediately north of this site on the east side of Waterloo Road. For the purpose of this study these are known as the Union Jack Club Towers. The northern one is 82m AOD and the southern one is 74mAOD. The roof top of the former can be glimpsed in some views from the West side of Parliament Square. The site comprises low rise development lining the east side of Waterloo Road immediately north of Emma Conns Gardens. The Old Vic Theatre overlooks to the South.

The Miller Hare study identified maximum height range of somewhere between 80m AOD and 90m AOD. Five view locations were assessed. Initial modelling at 90m indicated visibility from Parliament Square which was not considered acceptable in terms of the setting of the Westminster World Heritage Site. Therefore the model was amended to 70m AOD to remove all visibility in these views.

Development at this height has a low impact in wider views of the emerging cluster. Modelling has indicated that it is the local impacts which require careful consideration. Whilst the height itself is considered comfortable in the modelled views, the full extrusion of the site at 70m AOD is problematic in terms of its bulk in a number of the immediate views. Given the sensitivity of Emma Conns Gardens, the requirement to protect the setting of the Lower Marsh Conservation Area and a desire to avoid canyon like development along Waterloo Road it is essential that any tall building development coming forward is broken down into individual elements with the tall buildings well-spaced. Greatest height at the south stepping down in height to the south would help blend the tall buildings better into their context.

Recommended General Height: 70m AOD max. Well-spaced for townscape.

Site 7 – Beckett House, Lambeth Palace Road

The existing Beckett House is 53m AOD. The primary sensitivity of this site in relates to LVMF 27B.1 and 2 (Parliament Square to WWHS) where the existing building visually attaches to the Elizabeth Tower. It is essential that any development coming forward does not distract from the appreciation of the Elizabeth Tower and is not so large as to compete with it in terms of visual attachment. For that reason the height of adjoining Urban Nest scheme (also visible in the view) was considered the acceptable maximum - 66m AOD. The Miller Hare modelling thus identified a height range of 60- 70m AOD max.

Initial modelling of views from Lower Marsh has identified 70m as potentially over bearing on the setting of that conservation area. For that reason 60m has been modelled.

Recommended General Height: 60m AOD max.

Site 8 – Royal Street

This site comprises two existing buildings - Stangate House 47mAOD; and Canterbury House 36mAOD. The Miller Hare modelling suggested 70m rising to 90m AOD at SE corner as appropriate in terms of the setting of the World Heritage Site. However, in initial modelling considerations in relation to impacts Lower Marsh, Archbishops Park and St Thomas' Hospital's listed buildings has resulted in a model of 50m AOD being considered.

Recommended General Height: 50m AOD max.

[illegible]

APPENDIX 2 Views Analysis

Site 1 - ITV, Upper Ground

This site sits separate from the established cluster of tall buildings at York Road / Waterloo Road. It is prominently located on the river frontage near the Blackfriars Road cluster.

There is an existing post-war tall building on this site. Approved height of a replacement tower is 108m AOD. Given the amount of modelling undertaken for the recent approval and given the approved heights align with the 100- 110m AOD height identified by Miller Hare no further modelling has been undertaken. One of the key considerations in the Miller Hare modelling was to ensure no visibility from the within courtyard of Somerset House.

The approved scheme has been included in modelling to aid assessment of its effect on cumulative impacts.

Site 2 – Doon Street

Site 2- View 1 Waterloo Bridge – on the borough boundary



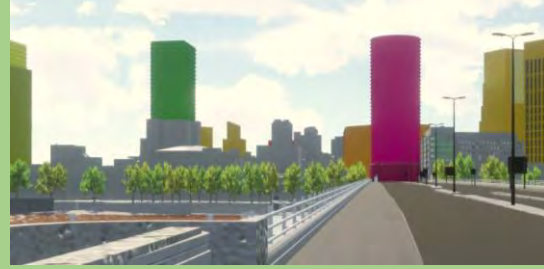
Waterloo bridge provides a vantage point from which to appreciate the South Bank. The sharp bend in the River Thames can be appreciated here too. The view is dominated by the townscape of post-war and recent large tall building development both near and distant. Some of the buildings such as National Theatre, Royal Festival Hall and Shell Centre are of special interest but the prevailing character is varied. The IMAX site terminates the axial view along Waterloo Bridge. Receptor sensitivity: Moderate.

Subject model (dark green) rises behind the fly tower of the NT but this impact no greater than the approved scheme which is actually taller. Height looks comfortable with Southbank Place scheme which is nearing completion – being a comparable height they would frame Waterloo Bridge in this View.

Cumulative – Subject model (green) sits comfortably in terms of height with the modelled IMAX and approved Elizabeth House schemes. Waterloo station modelled scheme sits comfortably in background. Magnitude of Impact – Medium.

Significance of effect – Moderate.

Site 2- View 2 Waterloo Bridge – N landing by Somerset House

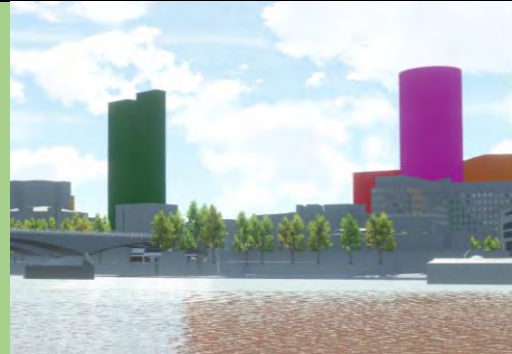


Waterloo Bridge provides a vantage point from which to appreciate the South Bank. The bridge is framed by trees on either side of it along Victoria Embankment. The Southbank is distant with the bridge occupying the middle ground. Low rise buildings such as National Theatre, Royal Festival Hall play a secondary role. Tall buildings – ITV (glimpsed extreme left) and Southbank Place building 4B (glimpsed extreme right) are noticeable features on the skyline. Doon Street site sits directly behind the National Theatre Fly tower in this view. Receptor sensitivity: Moderate.

Cumulative - Subject model (green) sits comfortably between the existing ITV tower (just glimpsed to left) and Southbank Place (glimpsed to right). Subject model (green) sits comfortably in terms of height with the modelled IMAX and approved Elizabeth House schemes. Waterloo station modelled scheme sits comfortably in background. Magnitude of Impact – Medium.

Significance of effect – Moderate.

Site 2 – View 3 LVMF20B.1 (on N side of river opposite RFH)



The view is a series of post-war object buildings, mostly with a strong horizontal massing in contrast with the Shell Tower (and Southbank Place). The principal elements are the Royal Festival Hall (just to right of view), surrounded by Whitehouse Apartments (former Shell Downstream) and South bank Place. Waterloo bridge and the National Theatre fly towers are to the left of the view. Receptor Sensitivity: High

Subject model (green) rise to the left of the view behind the National Theatre. Out of sight to the left is the ITV tower. Out of sight to the right is the Southbank Place scheme (on site).

Cumulative: ITV tower (yellow) is out of sight to left, with IMAX (pink) when considered with Elizabeth House approved (out of sight to right) make a comfortable loose group of comparable heights. Magnitude of Impact: Medium.

The impacts accord with the guidance set out in paras 351 and 352 of LVMF.

Significance of effect: Moderate.

Site 2 – View 4 - Queens Walk looking south between IBM / National Theatre



The viewer has their back to the River Thames and is looking SE towards Upper Ground. The axis is framed by the grade II* National Theatre on the right and the locally listed IBM HQ; both designed by Denys Lasdun and exhibiting striking linear forms. Receptor Sensitivity: High.

Subject model (green) provides a dramatic termination down the street. Cumulative: Upper part of the model for 99-119 Waterloo Road (red) can just be glimpsed. Magnitude of impact: Large.

Significance of Effect: Major.

Site 2- View 5 - 5 Whitcote Street / Tennison Way junction

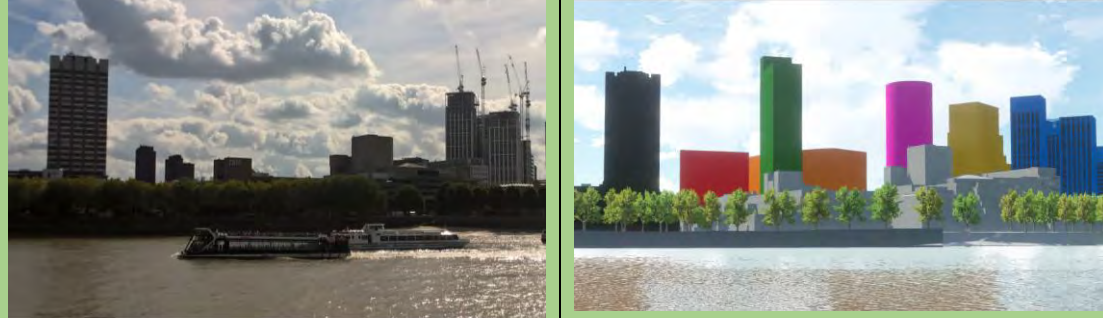


The foreground of this view is roadway. IMAX and James Clerk Maxwell Building frame a middle ground gap. Occupying the gap in the background is the grade II listed 51 Waterloo Road which is in red brick and features a corner turret. Receptor sensitivity: Moderate.

Rises in backdrop of No 51 Waterloo Road and Waterloo Bridge House which are both in the Waterloo CA. . This impact is not ideal. However, it is a kinetic experience – as the view moves south the proposal will be screened by that foreground development. As the viewer moves North the modelled IMAX development provides screening. Cumulative – IMAX model (pink) visible foreground left. Magnitude of impact: Medium.

Significance of effect: Moderate.

Site 2- View 6 - Victoria Embankment at Temple Tube Station



The river Thames forms the foreground and middle ground in this view. A broad expanse of the South Bank and Westminster can be appreciated in the background with Blackfriars Road towers on the left panning through to the Elizabeth Tower on the right. National Theatre sits in centre. The varied cityscape of tall buildings can be appreciated – ITV tower, Southbank Place, London Eye etc. Receptor sensitivity: High.

Subject model (green) rises behind locally listed IBM HQ with existing ITV tower (black) to left and Southbank Place (blue) to right. In this view 110m OAD it looks comfortable. Cumulative: the Elizabeth House approval (yellow) and IMAX model (pink) add further to the character of the informal cluster. Magnitude of impact: Medium.

Please note – a modelling error with 99 – 119 Waterloo Road (red) makes it more dominant than it would in reality. This is because the existing tall buildings at Union Jack Club (seen in photograph but which have not come out in this model) would actually provide foreground screening to the red coloured block.

Significance of effect: Moderate.

Site 2 – View 7 - Upper Ground at corner of Barge House Street



This view position looks SW along Upper Ground. Bernie Spain Gardens occupies the foreground on either side of the road. ITV tower is visible ahead right. Its approved replacement is in the same location but slightly taller. Distant street trees screen low rise modern housing on the left. Receptor sensitivity: Low.

Subject model (green) would be further away than ITV tower but still a significant presence. No cumulative impacts in this view. Magnitude of Impact: Large.

Significance of Effect: Minor.

Site 2 – View 8- View 8 Surrey Street, The Strand

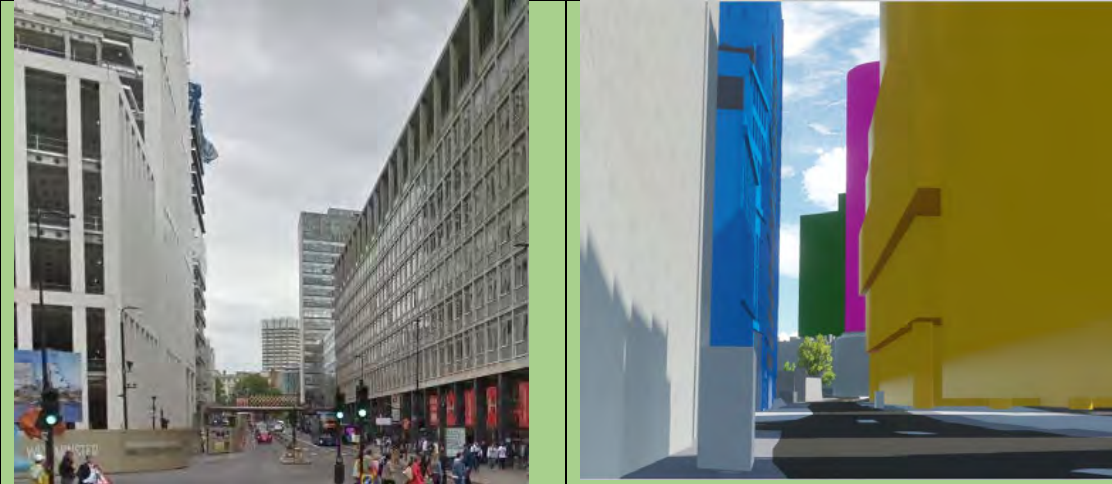


Surrey Street is a narrow route on the north bank of the Thames. It has been selected because it aligns with the Doon Street site. The narrow sense of enclosure in the foreground draws the eye to the end of the street. In middle ground is a screen of trees on the Victoria Embankment. In the distance the Union Jack Club towers are visible with further more distant towers beyond. Receptor sensitivity: Moderate.

Terminates the axial vista as a striking slender form. Cumulative impacts: The model for 99- 119 Waterloo Road (red) and Waterloo Station (orange) show as background forms. Please note – a modelling error with 99 – 119 Waterloo Road (red) makes in more dominant that it would in reality. This is because the existing tall buildings at Union Jack Club (seen in photograph but which have not come out in this model) would actually provide foreground screening to the red coloured block. Magnitude of impact: Medium.

Significance of Effect: Moderate.

Site 2 – View 9 - York Road from County Hall N Side



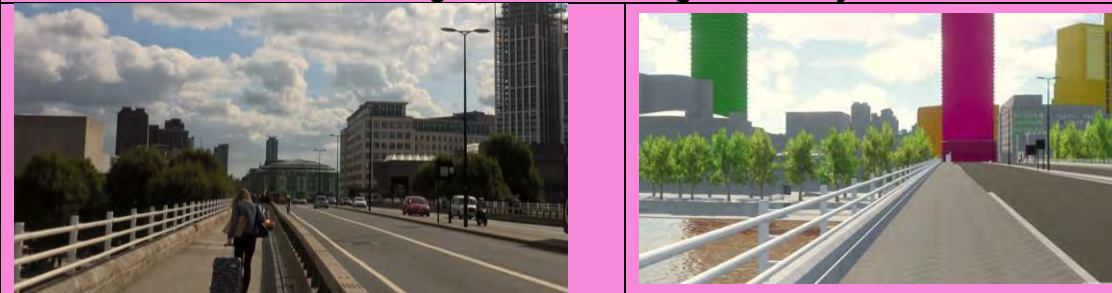
York Road is aligned NE and has an urban character with buildings in Portland stone and pale concrete. It is busy, urban and enclosed. The ITV tower and Elizabeth House tower can be glimpsed at the end of the road. Receptor Sensitivity: Low.

Subject model (green) will terminate vista and block the ITV tower from view. Cumulative impact: Elizabeth House proposal (yellow) appears in foreground. IMAX model (pink) appears between it and subject model. Magnitude of Impact: Small.

Significance of Effect: Negligible.

Site 3 - IMAX, Waterloo Road

Site 3 - View 1 - Waterloo Bridge – on the borough boundary



Waterloo Bridge is a busy traffic thoroughfare. Its pavements provide an elevated vantage point from which to appreciate the South Bank which lies on either side. The sharp bend in the River Thames can be appreciated here too by looking up and down stream. The view ahead when coming across the borough boundary from the north (City of Westminster) is dominated by the townscape of post-war and recent large tall building development both near and distant. Important buildings such as National Theatre, QEH / Hayward, Royal Festival Hall are situated at low level and take a secondary role to the larger taller buildings ahead. The prevailing character is varied and largely post-war. The low drum of the IMAX building terminates the axial view along Waterloo Bridge. Receptor sensitivity: Moderate.

Subject model (pink) has an axial alignment with the bridge and terminates the view. The proportion of the model in terms of its height to its width is acceptable. Indeed any reduction in height here could result in a stumpy appearance. The height at

130mAOD is comparable with The Southbank Place scheme (on site in photograph and blue in model).

Cumulative – The subject model (pink) is of comparable in height to Southbank Place (blue) and the Elizabeth House approval (yellow). Just out of sight to the left is the Doon Street tower. The cumulative effect is of these tall buildings is harmonious. Backdrop models – Site 6 (91 – 119 Waterloo Road in red) and Waterloo Station (Site 5 in orange) are not problematic in this view. Magnitude of Impact – Medium.

Significance of the effect: Moderate.

Site 3- View 2 - Waterloo bridge at Somerset House entrance



Waterloo Bridge provides a vantage point from which to appreciate the South Bank. The bridge is framed by trees on either side of it along Victoria Embankment. The Southbank is distant with the bridge occupying the middle ground. Low rise buildings such as National Theatre, Royal Festival Hall play a secondary role. Tall buildings – ITV (out of sight extreme left) and Southbank Place buildings 4A and 4B (extreme right) are noticeable features on the skyline. Receptor sensitivity: Moderate.

Subject model (model) has an axial alignment with the bridge and terminates the view. The proportion of the model in terms of its height to its width is acceptable. Indeed any reduction in height here could result in a stumpy appearance. The height at 130mAOD is comparable with The Southbank Place scheme (on site in photograph). Cumulative – The subject model (pink) is of comparable in height to Southbank Place (blue) and the Elizabeth House approval (yellow). Just to the left is the Doon Street tower (dark green). The cumulative effect is of these tall buildings is harmonious. Magnitude of Impact – Medium.

Significance of the effect: Moderate.

Site 3- View 3 - LVMF20B.1 (on N side of river opposite RFH)



The view is a series of post-war object buildings, mostly with a strong horizontal massing in contrast with the Shell Tower (and Southbank Place). The principal elements are the Royal Festival Hall (RFH) surrounded by Whitehouse Apartments (former Shell Downstream) and South bank Place. Receptor Sensitivity: High

Subject model (pink) rises to behind the Whitehouse Apartments to the left (east) of RFH. The Southbank Place development rises behind the RFH. Cumulative – The

subject model (pink) is of comparable in height to Southbank Place scheme (yellow). Just glimpsed to the left is the Doon Street model (green) and out of sight to the right London Eye. The cumulative effect is of these tall buildings is acceptable because of their comparable heights and the spaces between them. Models for 91 – 119 Waterloo Road (red) and Waterloo Station (orange) are not visible in this view. Magnitude of Impact – Medium.

The impacts accord with the guidance set out in paras 351 and 352 of LVMF.

Significance of the effect: Moderate.

Site 3 – View 4 - Stamford Street – junction with Broadwall



Stamford Street is straight and the viewer faces SE. The left side of the street is lined with Grade II listed buildings. The right hand of the street (screened by trees) is lined with modern, low-rise housing. Building 4A of the Southbank Place scheme terminates to view - orthogonally aligned on axis. It is flanked by buildings 2 and 4B. Sensitivity receptor: Moderate.

Subject model (pink) is similar height to the Southbank Place scheme (blue) which it shields from view. The subject model terminates the axial view down the road. Cumulative – the Elizabeth House approval (yellow) appears as a lower, secondary form to the left. Magnitude of Impact – Medium.

Significance of the effect: Moderate.

Site 3- View 5 - Theed Street – E end



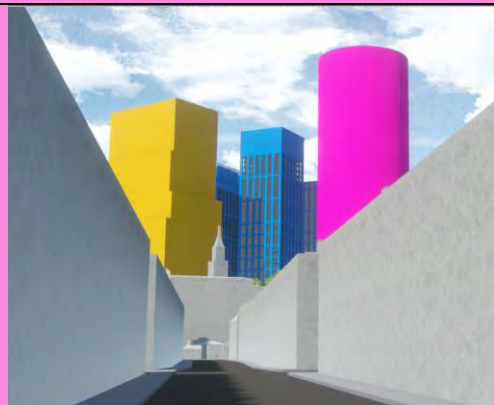
Theed Street is 19th Century in character with low rise stock brick buildings on the right side and the rear gardens walls of Whittlesey Street properties on the left. The townscape terminating the view at the end of the street is layered. Tree tops,

Elizabeth House and buildings 2, 4A and 4B at Southbank Place. Sensitivity receptor: High.

Subject model (pink) would appear as a noticeably larger form to the right of the Southbank Place building 4A (on site in the photograph, blue in the model) and screening building 4B. There would be a stepping effect from left to right from existing Elizabeth House. The height variation helps differentiate the blocks. Cumulative: The approved Elizabeth House scheme (yellow) creates a more balanced composition with Southbank Place (blue) and subject model (pink). There is sufficient height variation to differentiate the blocks. This is assisted by silhouette / perspective. Magnitude of Impact – Large.

Significance of the effect: Major.

Site 3- View 6 -- Whittlesey Street – E end



Whittlesey Street is straight and lined with grade II listed Georgian houses of uniform character. A layering of buildings terminate terminating the view down the street. Elizabeth House, Southbank Place – building 3 (on site immediately behind the church tower) and buildings 4A and 4B (to right). Receptor Sensitivity: High.

Subject model (pink) would appear as a noticeably larger form to the right of the Southbank Place scheme (on site in the photograph, blue in the model). There would be a stepping effect from left to right from existing Elizabeth House (left of church tower). The height variation helps differentiate the blocks. Being closer to the other buildings make it more prominent. Cumulative: The approved Elizabeth House scheme (yellow) creates a more balanced composition with Southbank Place (blue) and subject model (pink). There is sufficient height variation to differentiate the blocks. This is assisted by silhouette / perspective. Magnitude of Impact – Large.

Significance of the effect: Major.

Site 3 – View 7 - Waterloo Road – at Morley Street

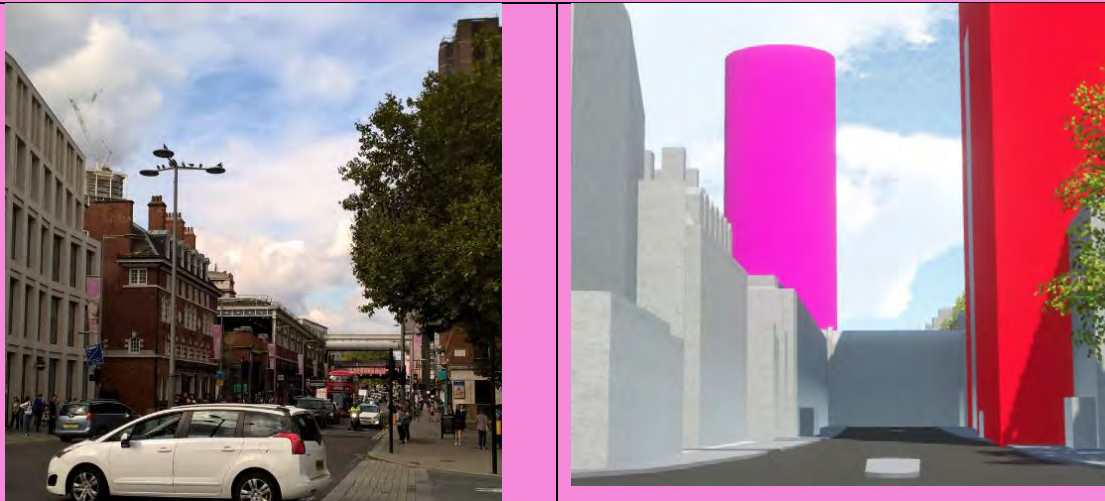


Waterloo Road here is straight and the view is looking NW towards Waterloo Bridge. The foreground character is modern and varied. Middle ground left the trees on Millennium Green screen Waterloo Station. Middle ground right are the Union Jack Club towers. Imax terminates the vista but is screened by the railway bridges spanning Waterloo Road. Receptor sensitivity: Low.

Subject model (pink) will appear ahead left terminating the vista north. The existing Union Jack Club towers will remain visible to the right. Cumulative. The subject model (pink) is largely screened by the Waterloo Station model (yellow). Nos. 99 – 119 Waterloo Road (red) screens the existing Union Jack Club towers. Magnitude of Impact – Small.

Significance of the effect: Negligible.

Site 3 – View 8 - Waterloo Road – Outside Old Vic Theatre



Outside Old Vic looking NW up Waterloo Road the grade II listed former Fire Station and the low wise frontage of Waterloo Station occupy the middle ground. In the foreground are the trees of Emma Conns Gardens and a recent development. In the background Southbank Place Buildings 4B is visible under construction above the fire station's foreground chimney. Receptor Sensitivity: Moderate.

Subject model (pink) is distant, aligned to the left of the road. Sky views separate it from Union Jack Club towers which would still be visible on the right. Cumulative impact. Modelled buildings at 99- 119 Waterloo Road (red) appear in the foreground of the existing Union Jack towers. Please note that the model for redevelopment

over Waterloo Station (orange) has been omitted as otherwise it could completely obscure the subject model (pink) in this view. For that view see Site 5 View 1. Magnitude of Impact: Medium.

Significance of the effect: Moderate.

Site 3 View 9 - York Road N side at County Hall N block

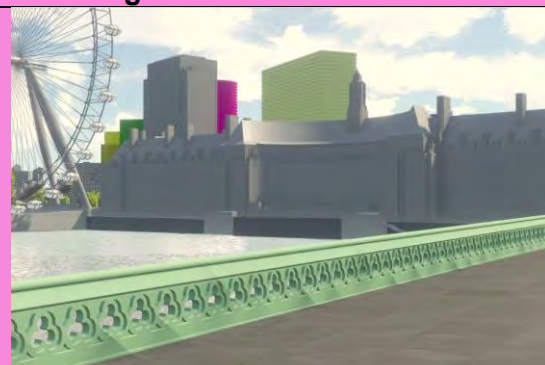


York Road is aligned NE and has an urban character with the Southbank Place buildings in Portland stone and pale concrete. It is busy, urban and enclosed. The ITV tower and Elizabeth House can be glimpsed at the end of the road. Receptor Sensitivity: Low.

Subject model (pink) will be glimpsed rising beyond existing Elizabeth House tower and rising above it. Cumulative includes Doon Street (dark green) in distance obscures ITV tower and the Elizabeth House proposal (yellow) on the right screens subject model. Magnitude of Impact: Small.

Significance of the effect: Negligible.

Site 3 View 10 - LVMF 18.B1 – Westminster Bridge: downstream



This view extends across the north pavement of the bridge. In 18B.1 views to Lambeth London Eye, County Hall and Shell Centre / Southbank Place and prominent. In 18B.2 there are views towards Westminster and the City. Southbank Place scheme is under construction in the photograph – rising to immediate right of Shell Tower. Construction has advanced since the photograph was taken. Receptor Sensitivity: High.

Elizabeth House approval (cream) is seen rising behind County Hall. Subject model (pink) can only be glimpsed in the model because the Southbank Place scheme has been omitted from the model for illustration purposes. Magnitude of Impact – Small.

Cumulative impact – not visible. Magnitude of Impact – Small.

Significance of the effect: Negligible.

Site 4 Elizabeth House

There is an existing post-war tall building on this site. The current approved scheme reaches a height 123m AOD (northern end)) and 53m AOD (southern block). Miller Hare has included the approved scheme in its modelling.

Given the extensive modelling undertaken for the approved further modelling has not been undertaken. The approved scheme has been included in modelling to aid assessment of its effect on cumulative impacts.

Site 5 - Waterloo Station

Site 5 View 1 - The Cut outside Old Vic



Outside Old Vic looking NW up Waterloo Road the grade II listed former Fire Station and the low wise frontage of Waterloo Station occupy the middle ground. In the foreground are the trees of Emma Conns Gardens and a recent development. In the background Southbank Place Buildings 4A and 4B are seen. Receptor Sensitivity: Moderate.

Subject model (orange) in its full extruded form is very dominant in the background of the grade II listed former fire station and overbearing on the street scene. Cumulative – the IMAX proposal (pink) can be glimpsed in the distance. The model for 99- 119 Waterloo Road (red) can be glimpsed in the foreground. This model screens the existing tall buildings of the Union Jack club. Magnitude of Impact – Large.

Significance of the effect: Major.

The impact of a full extrusion of this site as a tall building is not acceptable. However, a scheme of varied heights from which height is extruded – as seen opposite at the Union Jack club could be acceptable.

Site 5 View 2 - Waterloo Road– at Morley Street



Waterloo Road here is straight and the view is looking NW towards Waterloo Bridge. The foreground character is modern and varied. Middle ground left the trees on Millennium Green screen Waterloo Station. Middle ground right are the Union Jack Club towers. Imax terminates the vista but is screened by the railway bridges spanning Waterloo Road. Receptor sensitivity: Low.

Subject model (orange) in its full extruded form is very dominant in the view and overbearing on the street scene. However, the height itself is not problematic in this view.

Cumulative –The model for 99- 119 Waterloo Road (red) can be glimpsed in the right. That model screens the existing tall buildings of the Union Jack club.

Cumulative impact concerns about adverse sense of enclosure and canyon-like effect on that section of Waterloo Road. Magnitude of Impact – Large.

Significance of the effect: Moderate.

The impact of a full extrusion of this site as a tall building is not acceptable. However, a scheme of varied lower heights from which individual tall elements are extruded – as seen opposite at the Union Jack club - could be acceptable if a canyon effect is avoided. It should be noted that a reduction in the mass of the subject model (orange) will further reveal the IMAX proposal (pink) and the Elizabeth House and Southbank Place schemes which are currently screened.

Site 5 - View 3 Waterloo Road at junction with Stamford Street



This view position looks south towards Waterloo station. The area is unusually spacious for Waterloo – a combination of the Waterloo roundabout roadway and a broad pedestrian area offers great potential for enhanced public realm. Large mature trees in the pedestrian area dominate the middle ground with St John's Church to the left. The Victory Arch (grade II) and Elizabeth House are out of sight to the right. In the middle ground sits the elevated mass of Waterloo station's main building. On the left side the Union Jack Club towers are visible. Receptor Sensitivity: High (spatial quality).

Subject model (orange) – its fully extruded mass has a dominant presence here due to the openness of this part of Waterloo Road. The presence of Union Jack Club towers raises implications about canyon-like development on either side of Waterloo Road. Cumulative – The 99 – 119 Waterloo Road model (red) can be glimpsed in the distance. Magnitude of impact: Large.

Significance of the effect: Major.

The impact of a full extrusion of this site as a tall building is not acceptable. However, a scheme of varied lower heights from which individual tall elements are extruded could be acceptable if a canyon effect is avoided.

Site 5 – View 4 - Waterloo bridge – on the borough boundary



Waterloo bridge provides a vantage point from which to appreciate the South Bank. The sharp bend in the River Thames can be appreciated here too. The view is dominated by the townscape of post-war and recent large tall building development both near and distant. Some of the buildings such as National Theatre, Royal Festival Hall and Shell Centre are of special interest but the prevailing character is varied. The IMAX site terminates the axial view along Waterloo bridge. Receptor sensitivity: moderate.

Subject model (orange) will appear amongst the low rise foreground buildings such as Whitehouse Apartments. Cumulative: the IMAX model (pink) will effectively screen much of the subject model. Magnitude of Impact – Small.

Cumulative The Elizabeth House approval (yellow) and completed Southbank Place (blue) alter the scale of the locality and the subject (orange) sits comfortably. The introduction of IMAX (pink) has a screening effect. Magnitude of Impact – Small.

Significance of the effect: Minor.

Site 5 - View 5 - LVMF20B.1 (on N side of river opposite RFH)

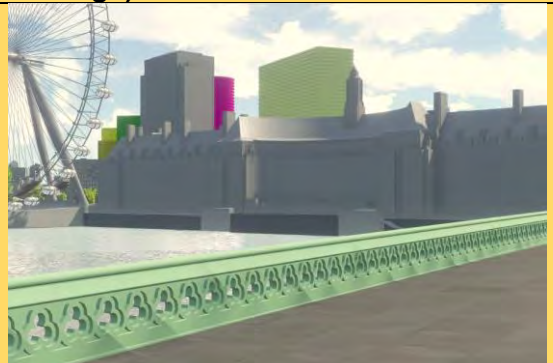


The view is a series of post-war object buildings, mostly with a strong horizontal massing in contrast with the Shell Tower (and Southbank Place). The principal elements are the Royal Festival Hall (RFH), surrounded by Whitehouse Apartments (former Shell Downstream) and South bank Place. Receptor Sensitivity: High.

Subject model (orange) is just visible rising behind the Whitehouse Apartments. It reads as a low, subordinate form in comparison to the Southbank Place scheme (on site and blue in the model). Cumulative: The presence of the IMAX proposal (pink) and the Elizabeth House approval (yellow) do not change the effect. Magnitude of Impact – Small.

Significance of the effect: Moderate.

Site 5 - View 6 - LVMF18B1 (Westminster Bridge)



This view extends across the north pavement of the bridge. In 18B.1 views to Lambeth London Eye, County Hall and Shell Centre / Southbank Place and prominent. In 18B.2 there are views towards Westminster and the City. Receptor Sensitivity: High.

Subject model (orange) is not visible. Magnitude of Impact – n/a.

Significance of the effect: n/a

Site 5 - View 7 – LVMF27A.1



This viewing location is in the SW corner of Parliament Square looking NE. Foreground is a busy road. Parliament Square occupies the middle ground. The central focus of the view is the Elizabeth Tower. This is a key component of the Westminster World Heritage Site (WWHS). To its left, a townscape gap allows views across the River Thames to County Hall and beyond. Receptor Sensitivity – Very High.

Subject model (orange) is not visible. Magnitude of Impact – n/a.

Significance of the effect: n/a

Site 6 - 99 – 119 Waterloo Rd

Site 6 - View 1 - Waterloo Road from Morley Street junction.



Waterloo Road here is straight and the view is looking NW towards Waterloo Bridge. The foreground character is modern and varied. Middle ground left the trees on Millennium Green screen Waterloo Station. Middle ground right are the Union Jack Club towers. Imax terminates the vista but is screened by the railway bridges spanning Waterloo Road. Receptor sensitivity: Low.

Subject model (red). Whilst it is of lower height than the Union Jack Club towers its closer proximity to the view makes it slightly more dominant. Cumulative: When considered with the fully extruded Waterloo station site (orange) the two elements appear overly dominant, creating an unwelcome canyon effect to Waterloo Road. Magnitude of change: Large.

Significance of Effect: Moderate.

The subject model (red) full footprint extruded to its full height is unacceptable. Reduction in height and greater variety in site massing required.

Site 6 - View 2 Waterloo Bridge – on the borough boundary



Waterloo bridge provides a vantage point from which to appreciate the South Bank. The sharp bend in the River Thames can be appreciated here too. The view is dominated by the townscape of post-war and recent large tall building development both near and distant. Some of the buildings such as National Theatre, Royal Festival Hall and Shell Centre are of special interest but the prevailing character is varied. The IMAX site terminates the axial view along Waterloo bridge. Receptor sensitivity: Moderate.

Being lower than the Union Jack Towers the proposal is almost completely screened by them. Magnitude of Impact – negligible.

Significance of the effect: negligible.

Site 6 - View 3 - Waterloo Bridge – N landing by Somerset House

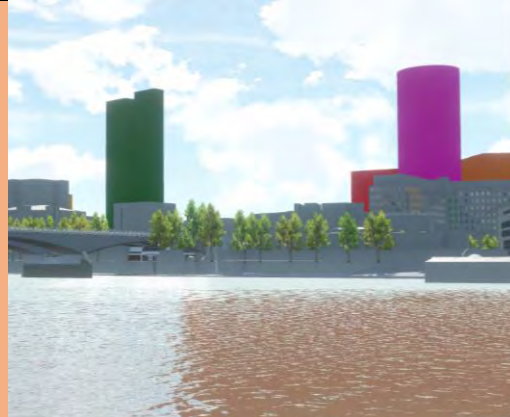


Waterloo Bridge provides a vantage point from which to appreciate the South Bank. The bridge is framed by trees on either side of it along Victoria Embankment. The Southbank is distant with the bridge occupying the middle ground. Low rise buildings such as National Theatre, Royal Festival Hall play a secondary role. Tall buildings – Blackfriars, ITV and Shell are noticeable features on the skyline. The IMAX site terminates the axial view along Waterloo Bridge. Receptor sensitivity: Moderate.

Being lower than the Union Jack Towers the proposal is almost completely screened by them. Magnitude of Impact: Negligible.

Significance of the effect: Negligible.

Site 6 – View 4 -LVMF20B.1 (on N side of river opposite RFH)

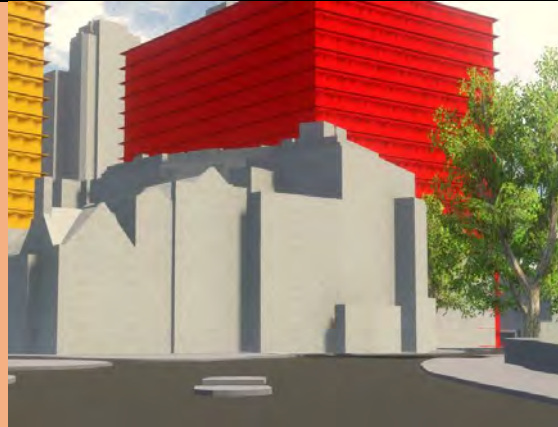


The view is a series of post-war object buildings, mostly with a strong horizontal massing in contrast with the Shell Tower (and Southbank Place). The principal elements are the Royal Festival Hall, surrounded by Whitehouse Apartments (former Shell Downstream) and South bank Place. Receptor Sensitivity: High.

Subject model (red) can be glimpsed as a low form behind the White House Apartments. Cumulative: the IMAX model (pink) provides some additional screening. Magnitude of Impact: Negligible.

Significance of Effect: Minor.

Site 6 – View 5 - Baylis Road looking north



This view position is the pedestrian at the junction with Lower Marsh. The view is northward. Roadway occupies the foreground. The locally listed former library, a Victorian office and sympathetic modern buildings occupy the middle ground. In the background the towers of the Union Jack Club can be seen as slender, individual forms (left one is 82m AOD and right one is 74mAOD. The Old Vic Theatre is out of sight on the right. Receptor sensitivity: Moderate.

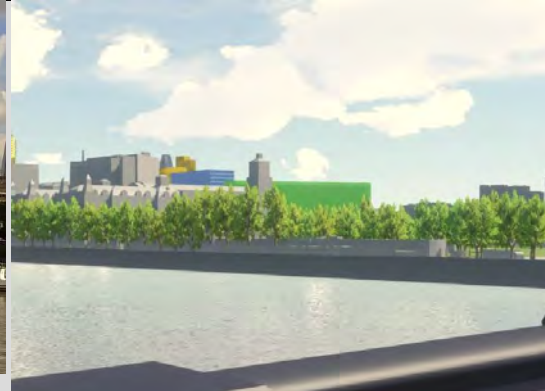
Subject model (red) is a full extrusion of the site. Cumulative: Waterloo Station model (yellow) can be glimpsed to the left. Magnitude of Impact: Large.

Significance of Effect: Major.

The subject model (red) full footprint extruded to its full height is unacceptable. Reduction in height and greater variety in site massing required.

Site 7 - Beckett House

Site 7 – View 1 - LVMF19A.1 – Lambeth Bridge



The River Thames forms the foreground. In the middle ground the tree lined Albert Embankment and grade II listed St Thomas' Hospital complex with its campanile tower. Out of sight to the right is Lambeth palace (grade I). Out of sight to the left is Westminster Bridge. Receptor sensitivity: High.

Subject model (blue) sits to the left of the campanile as a compact, unobtrusive form. Cumulative: the distant yellow forms are approvals on Blackfriars Road (Southwark). The green mass is the Royal Street model. Magnitude of Impact: Small.

Significance of Effect: Minor.

Site 7-View 2 - LVMF 27B.1 and .2 - N side Parliament Square



This viewing location is in the north pavement of Parliament Square looking SE. Foreground is a busy road. Parliament Square occupies the middle ground right. The central focus of the view is the palace of Westminster with Westminster Abbey to its right. This is a key component of the Westminster World Heritage Site. To its left side the view is the Elizabeth Tower - a dominant feature. A townscape gap to its immediate left allows views across the River Thames towards St Thomas's Hospital and beyond. The Urban Nest scheme can be seen as a distant white form. The existing Beckett House is the dark building in the middle of the view. Receptor Sensitivity: Very High.

The yellow building to the left is Urban Nest building (66m AOD). The proposed additional height of the subject model is light blue with the existing mass of Beckett House shown as the grey form beneath it. The proposal visually attaches to the Elizabeth Tower at a subordinate scale similar to Urban Nest building. Magnitude of Impact: Small.

Significance of Effect: Moderate.

Site 7 – View 3 - Westminster Bridge



Whilst Westminster Bridge is a view location for LVMF view 18B.1 views and 18B.2 in this instance the view is looking not up and down the river but from Westminster into Lambeth. The County Hall is out of sight to the left. Ahead is the Urban Nest building and Beckett House is the dark form ahead right. St Thomas' Hospital's modern campus sits to the right. Receptor Sensitivity: Moderate.

The yellow building to the left is Urban Nest building (66m AOD). The proposed additional height of the subject model is light blue with the existing mass of Beckett House shown as the grey form beneath it. The proposal sits comfortably within the established townscape. Magnitude of Impact: Small.

Significance of Effect: Minor.

Site 7 - View 4 - Victoria Tower Gardens (S end)



This is Lambeth local view – 'View east from Victoria Tower Gardens and SE from member's terrace of Houses of Parliament to the Lambeth palace complex (including St Mary's Church tower). When the viewer pans left the St Thomas's campus is visible – a group of historic buildings with a campanile tower in the middle ground with larger, modern buildings beyond. Receptor Sensitivity: High.

Here the river is foreground and the grade II St Thomas's Hospital campus including listed building are middle ground. The subject model (blue) is a low form rising behind the Grade II listed hospital. Cumulative: The low mass of Royal Street model (green) is just visible to the right. Magnitude of Impact: Small.

Significance of Impact: Minor.

Site 7 - View 5 - Archbishop's Park near Lambeth Road entrance



Archbishops Park is a historic, locally designed public park adjoining Lambeth Palace. The park is rectangular in plan has an N – S alignment. On approach from the passage off Lambeth Road the viewer arrives into the park facing north. Foreground lawn, middle ground sports pitches and background a screen of large, mature trees. The rooftop of the current Beckett House can just be glimpsed as a brown box above the tree tops. The Urban Nest scheme sits behind. Receptor sensitivity: High (landscape).

The subject model (blue) will be glimpsed through the trees as a distant roof top form which will screen Urban Nest building from view. Cumulative: the Royal Street model (green) adds a noticeable presence over the tree tops. Magnitude of Impact: Small.

Significance of effect: Moderate.

Site 7 – View 6 - Lower Marsh at junction with Frazier Street



This is a view south down the main part of the Lower Marsh Conservation Area. The intimate, historic townscape has a very strong sense of enclosure. The existing Beckett House can just be glimpsed as a dark, distant form. Receptor Sensitivity: High.

The subject model (blue) is partially screened by the Camel and Artichoke PH. Cumulative: Royal Street model (green) is a tall, distant mass. Magnitude of Change: Small.

Significance of Effect: Moderate.

Site 7 – View 7 - Lower Marsh at junction with Baylis Road



This is a view south down the main part of the Lower Marsh Conservation Area. The intimate, historic townscape has a very strong sense of enclosure. The existing Beckett House can just be glimpsed as a broad, dark, distant form. Receptor Sensitivity: High.

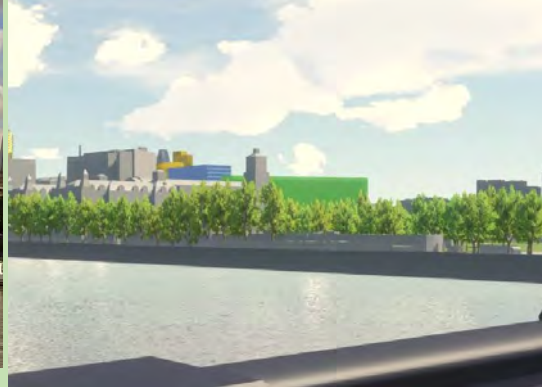
The subject model (blue) increases the sense of enclosure at the end of Lower Marsh. Cumulative: Royal Street model (green) has a similar enclosing effect. Magnitude of Change: Small.

Significance of Effect: Moderate.

Cont.

Site 8 - Royal Street

Site 8 – View 1 - LVMF19A.1 – Lambeth bridge (downstream)



The River Thames forms the foreground. In the middle ground the tree lined Albert Embankment and grade II listed St Thomas' Hospital complex with its campanile tower. Modern hospital blocks rise up behind. Out of sight to the right is Lambeth Palace (grade I). Out of sight to the left is Westminster Bridge. Receptor sensitivity: High.

Subject model (green) sits to the right of the campanile as a low, slab. Cumulative: The blue form is the Beckett Street model, the distant yellow forms are approvals on Blackfriars Road (Southwark). Magnitude of Impact: Medium.

Significance of Effect: Moderate.

Site 8 – View 2 - Westminster Bridge

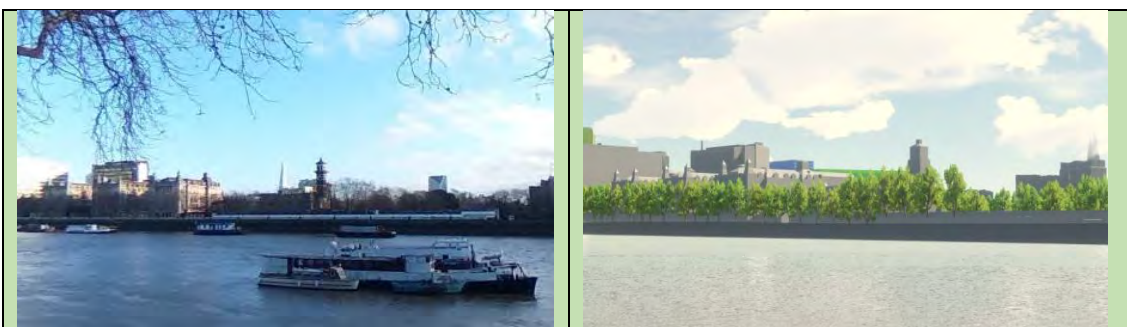


Whilst Westminster Bridge is a view location for LVMF view 18B.1 views and 18B.2 in this instance the view is looking not up and down the river but from Westminster into Lambeth. The County Hall is out of sight to the left. Ahead is the Urban Nest building and Beckett House is the dark form ahead right. St Thomas' Hospital's modern campus sits to the right. Receptor Sensitivity: Moderate.

The yellow building to the left is Urban Nest building (66m AOD). The subject model (green) is glimpsed end on. The light blue model indicates the additional height of the Beckett House. The proposal sits comfortably within the established townscape. Magnitude of Impact: Small.

Significance of Effect: Minor.

Site 8 – View 3 - Victoria Tower Gardens (middle by river wall)



This is Lambeth local view – ‘View east from Victoria Tower Gardens and SE from member’s terrace of Houses of Parliament to the Lambeth palace complex (including St Mary’s Church tower). When the viewer pans left the St Thomas’s campus is visible – a group of historic buildings with a campanile tower in the middle ground with larger, modern buildings beyond. Receptor Sensitivity: High.

Here the river is foreground and the grade II Thomas’s Hospital campus including listed building are middle ground. The subject model (green) is a low form rising behind the Grade II listed hospital. Cumulative: The low mass of Beckett House model (blue) is just visible to the right. Magnitude of Impact: Small.

Significance of Effect: Minor.

Site 8 – View 4 - Archbishop’s Park near Lambeth Road entrance



Archbishops Park is a historic, locally designed public park adjoining Lambeth Palace. The park is rectangular in plan has an N – S alignment. On approach from the passage off Lambeth Road the viewer arrives into the park facing north. Foreground lawn, middle ground sports pitches and background a screen of large, mature trees. The rooftop of the current Beckett House can just be glimpsed as a brown box above the tree tops. The two existing buildings (Stangate House and Canterbury House) are screened by the mature trees. Receptor sensitivity: High (landscape).

The subject model (green) adds a noticeable horizontal presence rising just clear of the tree tops along the north side of the park. Cumulative: The Beckett House model (blue) is glimpsed over the rooftop. Magnitude of Impact: Medium.

Significance of effect: Moderate.

Whilst the height may be acceptable the slab effect of the subject model is not.

Site 8 - View 5 - Archbishop's Park north of the MUGA by table tennis tables



Archbishops Park is a historic, locally designed public park adjoining Lambeth Palace. The park is rectangular in plan has an N – S alignment. A large row of mature trees encloses the northern side of Archbishop's Park. When the trees are in leaf the canopy is dense and provides significant screening. In winter however, the screening is minimal. This end of the park has much play equipment. Stangate House, Beckett House and Canterbury House are clearly visible through the bare winter canopy but hardly visible at all in summer. Receptor sensitivity: High (landscape).

The subject model (green) as a noticeable horizontal presence. Cumulative: the Beckett House model (blue) is largely screened. Magnitude of Impact: Medium.

Significance of effect: Moderate.

Whilst the height may be acceptable the slab effect of the subject model is not.

Site 8 – View 6 - Lower Marsh at junction with Frazier Street



This is a view south down the main part of the Lower Marsh Conservation Area. The intimate, historic townscape has a very strong sense of enclosure. The existing Canterbury House can be glimpsed as a low, horizontal form at the very end of the street. Receptor Sensitivity: High.

The subject model (green) is a tall slab across the end of the vista. Cumulative: Beckett House model (blue) is glimpsed but partially screened by the Camel and Artichoke PH. Magnitude of Change: Medium.

Significance of Effect: Moderate.

Whilst the height may be acceptable the slab effect of the subject model is not.

Site 8 – View 7 - Lower Marsh at junction with Baylis Road



The intimate, historic townscape has a very strong sense of enclosure. The existing Stangate House can be glimpsed against the sky at end of the street. The existing Beckett House to its right is seen as a brown slab. Receptor Sensitivity: High.

The subject model (green) is a slab across the end of the vista aligning with the parapet height of the existing Beckett House. Cumulative: Beckett House model (blue) is a more prominent mass. Magnitude of Change: Medium.

Significance of Effect: Moderate.

Whilst the height may be acceptable the slab effect of the subject model is not.

APPENDIX 3 MAP 2 – Conclusions Map



Site 1 ITV	Point block 100 - 105m AOD max.
Site 2 Doon Street	Point block 110m AOD max.
Site 3 IMAX	Point block 130m AOD max.
Site 4 Elizabeth House	North block 125m AOD. South block 55m AOD max.
Site 5 Waterloo Station	Point blocks 70m AOD max. Well spaced for good townscape.
Site 6 99 - 119 Waterloo Rd	Point blocks 60m AOD max. Stepping down towards Emma Corrs Gardens
Site 7 Beckett House	60m AOD max.
Site 8 Royal Street	Point blocks 50m AOD max. Well spaced for good townscape.