

Cabinet: 28 January 2014
Blackfriars Road Supplementary Planning Document

No.	Title	Held at
Appendix A	Blackfriars Road supplementary planning document, 2014	Hard copy provided with the report
Appendix B	Representations received and the officer comments (Appendix J of the consultation report)	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4
Appendix C	Tracked changed version of the Blackfriars Road supplementary planning document, 2014	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4
Appendix D	Consultation report including a separate document containing appendices A-I Two separate documents	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4
Appendix E	Equalities analysis	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4
Appendix F	Sustainability appraisal	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4
Appendix G	Sustainability statement	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4
Appendix H	Appropriate assessment	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4
Appendix I	Urban design study	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4
Appendix J	Business and employment background paper	Available on the web at: http://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=4554&Ver=4



London Borough of Southwark

Blackfriars Road Supplementary Planning Document

Urban Design Study

January 2014

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Section 1: Introduction

1.1 What does this document do

1.1.1 This document sets out our analysis to inform our approach to urban design and building heights for the Blackfriars Road SPD area.

1.1.2 The purpose of the document is to set out:

- Our approach to preparing an urban design study.
- Our understanding of the character of Blackfriars Road and its surrounding area.
- Our approach to preparing guidance for building heights and tall buildings.

1.1.3 The findings of this document informs the urban design guidance in the Blackfriars Road Supplementary Planning Document (SPD), specifically guidance:

SPD 3 Public realm and open space

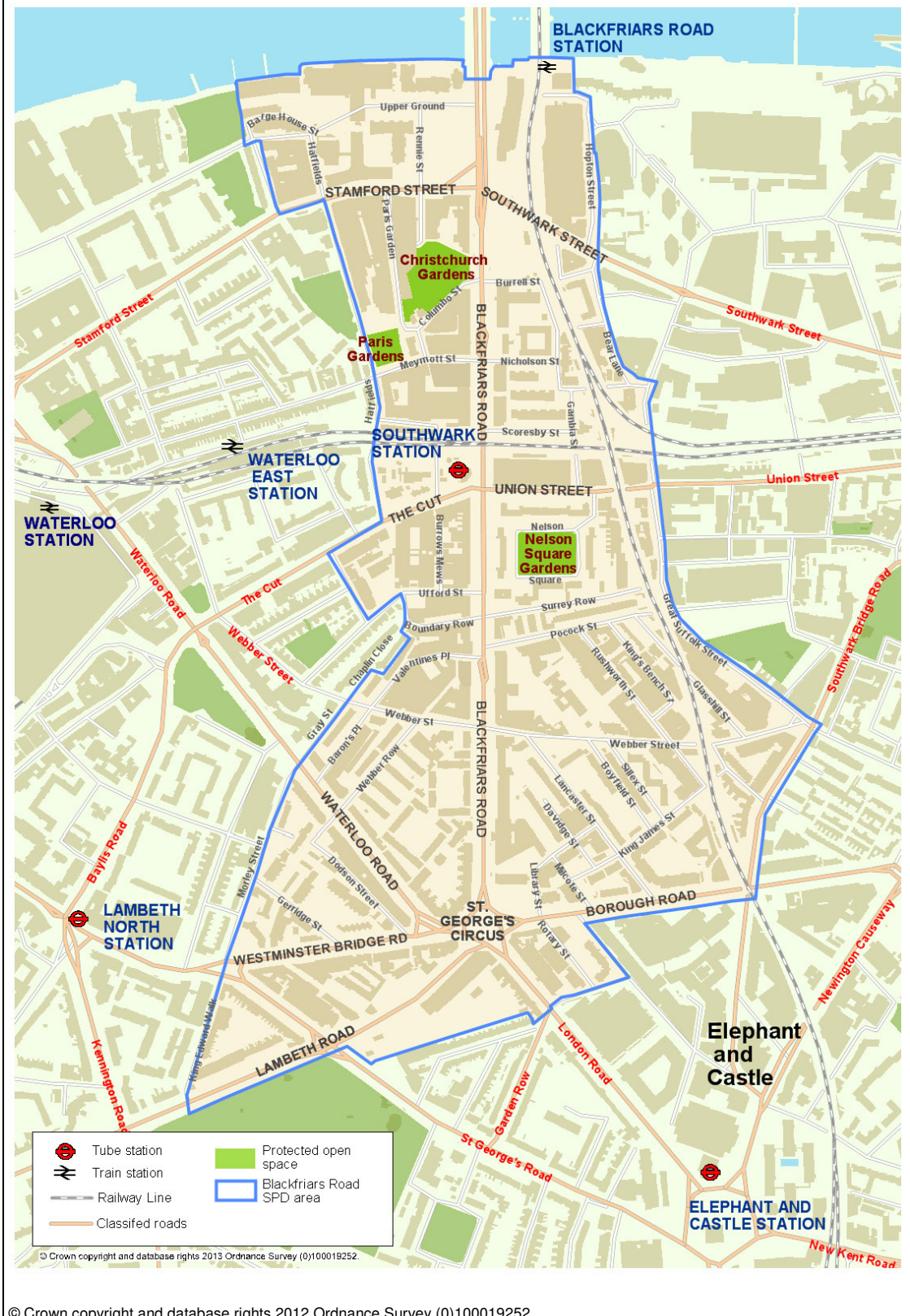
SPD 4 Built form and heritage

SPD 5 Building heights

1.2 Area covered

1.2.1 This document covers the Blackfriars Road SPD area as shown in Figure 1.

Figure 1. Blackfriars Road SPD area



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1.3 How to find your way around this document

Section	Content
Section 1: Introduction	This section sets out the role and purpose of the study.
Section 2: Policy background and evidence base	Sets out other documents and evidence base studies which have informed the preparation of this study.
Section 3: Approach to preparing urban design study	This section sets out the approach we have followed to prepare the urban design study.
Section 4: Blackfriars Road SPD area: character and context	This sets out a summary of the context and character of the SPD area.
Section 5: Urban design in the Blackfriars Road SPD area	This sets out the approach to the urban design framework, strategies and guidance
Section 6: Building height and tall buildings in the Blackfriars Road SPD area	This is the main section of the study. It provides a detailed analysis to identify the approach to building height and tall buildings.
Appendices	Background evidence which has informed this study including: <ul style="list-style-type: none"> • Study of contextual building heights in the Blackfriars Road SPD area • Views assessment • Tall building testing options

Section 2: Policy background and evidence base

2.1 Policy background

- 2.1.1 This section sets out the key national, regional and local policy and other guidance which has informed our approach to urban design and tall buildings in the Blackfriars Road SPD area.

NATIONAL POLICY

National Planning Policy Framework (2012) (NPPF)

- 2.1.2 The NPPF consolidates the draft of guidance that was previously in a range of Planning Policy Statements (PPS) and Planning Policy Guidance (PPG) into a single document. It sets out the Government's priorities for the planning system in England.
- 2.1.3 In terms of urban design, the NPPF aims to replace poor design with better design and improving the conditions in which people live, work, travel and take leisure by introducing the presumption in favour of sustainable development (para 9).
- 2.1.4 A number of core planning principles that underpin both plan-making and decision-taking state that planning should always seek to secure high quality design, take into account the different roles and character of different areas and conserve heritage assets in a manner appropriate to their significance (para 7 – bullet points 4, 5 and 10).
- 2.1.5 Section 7 of the NPPF deals specifically with how good design should be achieved. LPAs should prepare planning policies that contribute to the protection and positive enhancement of our natural, built and historic environment through better design (paras 9, 56), and that plans should establish a strong sense of place, optimise the potential of sites, respond to local character and history, and ensure that places are safe, inclusive and visually attractive. (para 58)
- 2.1.6 To achieve this, design policies should be based on the strategic and stated objectives for the future of an area, alongside a positive strategy for the conservation and enjoyment of our historic environments. (paras 126, 129, 132 and 137). A proportionate and up-to-date evidence base of an area's economic, social, environmental and historic characteristics is required to underpin design and heritage policies, assess the significance of heritage assets and assist the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future. (paras 158 and 169).
- 2.1.7 The NPPF, specifically section 12, has superseded PPS 5: 'Planning for the historic environment' which defined those parts of the historic environment that have significance because of their historic, archaeological, architectural or artistic interest as heritage assets. PPS5 covered heritage assets that were both designated (particular procedures apply to decisions that involve them)

and those which are not designated but which are of heritage interest nonetheless. The PPS 5 Practice Guide remains a valid and Government endorsed document pending the results of a review of guidance supporting national planning policy. It remains almost entirely relevant and useful in the application of the NPPF.

REGIONAL POLICY

The London Plan July 2011 consolidated with Revised Early Minor Alterations October 2013

- 2.1.8 The London Plan (2011) establishes the planning framework for the whole of London. Updates were made to the London Plan through the 'Revised Early Minor Alterations' (2013). These updates do not significantly affect the policy framework for urban design and the relevant part of the Revised Early Minor Alteration is summarised below.
- 2.1.9 Policy 2.13 Opportunity Areas and Intensification Areas designate London Bridge and Bankside as an opportunity area where significant change will take place.
- 2.1.10 Section 7 of the London Plan covers policies and guidance that relate to urban design and tall buildings, and makes reference to limiting the location of such buildings to opportunity areas.
- 2.1.11 London Plan policy 7.1 'Building London's neighbourhoods and communities' states that people should have neighbourhoods with a good quality environment in an active and supportive local community with the best possible access to services, infrastructure and public transport to wider London. Their neighbourhoods should also provide a character that is easy to understand and relate to.
- 2.1.12 Policy 7.2 'An inclusive environment' states that all new development must achieve the highest standards of accessible and inclusive design.
- 2.1.13 Policy 7.3 'Designing out crime' states that boroughs should seek to create safe, secure and appropriately accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or community cohesion.
- 2.1.14 Policy 7.4 'Local character' outlines the contextual factors that development proposals should have regard to when coming forward. This includes the existing form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings.
- 2.1.15 Policy 7.5 'Public realm' states that public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.
- 2.1.16 Policy 7.6 'Architecture' states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape, and should be of high quality, consider local character and heritage, potential impacts and optimise the potential of development sites.

- 2.1.17 Policy 7.7 'Location and design of tall and large buildings' says that tall and large buildings should meet a series of design criteria to ensure that they make positive and successful contributions, relate well to the local character and context and not impact negatively on strategic views or their surroundings. The policy recognises that tall and large buildings are likely to be sensitive in certain areas, especially in their proximity to heritage assets and their settings or other areas identified by local boroughs.
- 2.1.18 The policy states that tall buildings should generally be limited to the Central Activity Zone, Opportunity Areas and Areas for intensification. London Bridge and Bankside is identified as an opportunity area in Chapter 2 of the Plan. The policy also states that boroughs should work with the Mayor to identify appropriate, inappropriate and sensitive locations for tall buildings.
- 2.1.19 Policy 7.8 'Heritage assets and archaeology' recognises the importance of sustaining, protecting or enhancing the historic context and local character of an area through managed change. It states that undertaking a characterisation study of an area can assist in understanding its character. A characterisation study has been carried out for Bankside Borough and London Bridge. This document includes detailed analysis that helps us to understand the local context and historic character of Blackfriars Road.
- 2.1.20 A revised Early Minor Alteration to this policy adds that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 2.1.21 Policy 7.9 'Heritage-led regeneration' states that regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration.

LOCAL POLICY

- 2.1.22 Core Strategy Strategic Policy 12 'Design and conservation' is the adopted borough wide strategic urban design policy for Southwark. The detailed context that underpins this policy is set out in the Core Strategy tall building background paper (2010) and the Core Strategy urban design and conservation background paper (2010). The saved Southwark Plan sets out more detailed borough wide policies for urban design and building heights.
- 2.1.23 The SPD provides additional guidance on how the London Plan, Core Strategy and saved Southwark Plan policies should be implemented in the Blackfriars Road SPD area.
- 2.1.24 This relationship with the Core Strategy and saved Southwark Plan will change in the future as we update and replace our policies. Our timetable for preparing and updating our policies is set out in our Local development Scheme (LDS). The current LDS sets out that we will prepare a new Local Plan, called the New Southwark Plan, in accordance with the NPPF, which will set out the future strategy for development in Southwark with policies, master-plans, maps and site allocations. This will eventually replace the Core Strategy and saved Southwark Plan policies.

2.1.25 The SPD has been prepared so that it is consistent with the policies set out in our adopted Core Strategy and saved Southwark Plan policies. We have assessed the consistency of the Core Strategy and saved Southwark Plan policies against the National Planning Policy Framework (2012) (NPPF) , and have concluded that the policies within the two documents broadly conform with the NPPF. The core documents summarising this are:

- Review of the Core Strategy, Saved Southwark Plan and Area Action Plans to test for compliance with NPPF and conformity with the London Plan.
- Review of the Core Strategy 2011 to test compliance with the NPPF
- Review of the Saved Southwark Plan 2010 policies to test compliance with the NPPF.

Core Strategy (2011)

2.1.26 Our adopted Core Strategy sets out our overall strategy for design and conservation within the borough. Strategic Policy 12 sets out borough wide design and conservation policies that require development to be of the highest possible standards of design, give consideration to the conservation or enhancement of the historic environment, height and design of tall buildings and potential impact on the historic environment and within important local views.

2.1.27 The vision for the Bankside, Borough and London Bridge opportunity area outlined in the Core Strategy (paragraphs 4.07 - 4.19) promotes new development throughout the area, the largest being around Blackfriars Road and Bankside, with a cluster of tall buildings around the northern end of Blackfriars Road providing high quality offices, housing, hotels and shops and retail opportunities. Whilst we cannot formally adopt a vision for an area through a SPD, we will soon be preparing the New Southwark Plan. The New Southwark Plan will replace the Core Strategy and saved Southwark Plan policies, providing new policies and visions for Southwark. The Blackfriars Road SPD sets out guidance and proposals which we will look at developing further as we prepare the New Southwark Plan.

2.1.28 Within the Core Strategy, the Bankside, Borough and London Bridge vision and Strategic Policy 12, indicate that tall buildings may be appropriate around Blackfriars Road and must be of exemplary standard of design. The supporting text for policy 12 (paragraphs 5.113 - 5.115) explain that further detail on where tall buildings will be appropriate, inappropriate and sensitive will be undertaken.

2.1.29 Strategic policy 5 sets out the density ranges for new development, splitting the borough into three areas: the Central Activities Zone, the Urban Zone and the Suburban Zone. The area covered by the Blackfriars Road SPD sits within the Central Activities Zone. Policy 5 also sets out that within the opportunity area and action area cores the maximum densities may be exceeded when developments are of an exemplary standard of design.

Saved Southwark Plan (2007)

2.1.30 The Southwark Plan was adopted in 2007 and we have saved a number of the policies for continued use. The following saved polices that relate specifically to design.

- 2.1.31 Policy 3.11 'Efficient use of land' requires all developments maximise the efficient use of land, positively responding to the local context and complying with all design policies
- 2.1.32 Policy 3.12 'Quality in design' seeks to ensure that development achieves a high quality of both architectural and urban design, enhances the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit.
- 2.1.33 Policy 3.13 'Urban design' states that the principles of good urban design must be taken into account in all developments, with consideration given to the relationship between different buildings and streets, squares, parks and waterways and other spaces that make up the public domain; the nature and quality of the public domain itself; the relationship of one part of an urban area to another; and the pattern of movement and activity.
- 2.1.34 Policy 3.14 'Designing out crime' requires development in both the private and public realm, should be designed to improve community safety and crime prevention.
- 2.1.35 Policy 3.15 'Conservation of the historic environment' Development should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance.
- 2.1.36 Policy 3.16 'Conservation areas' seeks to ensure that development within conservation areas preserves or enhances the character or appearance of the area.
- 2.1.37 Policy 3.17 'Listed buildings' states that development proposals involving a listed building should preserve the building and its features of special architectural or historic interest.
- 2.1.38 Policy 3.18 'Setting of listed buildings, conservation areas and world heritage sites' seeks to ensure that the setting of heritage assets is preserved or enhanced.
- 2.1.39 Policy 3.19 'Archaeology' recognises the requirement to assess and evaluate development sites within Archaeological Priority Zones (APZs) for archaeological remains, such as the Borough, Bermondsey and Rivers APZ within the SPD area.
- 2.1.40 Policy 3.20 'Tall buildings' sets out the criteria that is required for tall buildings, such as sites with excellent accessibility to transport facilities. A tall building should also
- make a positive contribution to the landscape;
 - be located at a point of landmark significance;
 - be of the highest architectural standard;
 - Relate well to its surroundings, particularly at street level;
 - Contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

- 2.1.41 This policy also states that tall buildings should be located within the Central Activities Zone (particularly in opportunity areas) outside landmark viewing corridors. The Core Strategy is used in addition to this policy and identifies further areas within the borough that may be suitable for tall buildings, including Blackfriars Road.
- 2.1.42 Policy 3.22 'Important local views' states that identified views, panoramas, prospects and their settings that contribute to the image and built environment of the borough and wider London will be protected and enhanced.

Residential design standards supplementary planning document (2011)

- 2.1.43 The purpose of this supplementary planning document SPD is to set out the standard of design expected from residential development in Southwark. This will ensure all residential developments including new dwellings, extensions, alterations and conversions are sustainable and of a high standard of design. The SPD also aims to provide a clear set of standards to guide the design of residential development and to provide design guidelines for a wide range of dwelling types required to meet housing need.

2.2 Guidance Background

Heritage in local plans - how to create a sound plan under the NPPF, English Heritage (2012)

- 2.2.1 This section sets out the full list of relevant national, regional, local policy and other guidance which has informed our approach to urban design and tall buildings in Blackfriars Road. It only covers the documents which have been published or adopted since the Core Strategy was adopted and the Core Strategy urban design background papers were prepared.
- 2.2.2 This guidance states that Local Planning Authorities (LPAs) have to achieve the historic environment objectives of the NPPF to ensure that their local plan is sound. Requirements include an up-to-date evidence base that may be used to assess the significance of heritage assets and their settings within the local plan area, and for identification of new sites of archaeological or historic interest
- 2.2.3 A positive strategy for the conservation, enhancement and enjoyment of the historic environment and policies that are clearly identified as strategic are also required.

Guidance on tall buildings, CABE and English Heritage (2007)

- 2.2.4 When preparing an evidence base, LPAs should identify appropriate, inappropriate and sensitive locations for tall buildings as part of a detailed urban design study of the plan area. This should include analysis of the historic context, local character, and the identification of past mistakes and new opportunities.

2.2.5 It is recommended that LPAs use the guidance to inform policy making. The government has endorsed the guidance which is capable of being a material consideration in the determination of planning applications. There are a series of criteria for evaluating tall building proposals including:

- Relationship to context
- Effect on the historic context
- Effect on World Heritage Sites
- Relationship to transport infrastructure
- Contribution to public space and facilities
- Effect on the local environment
- Contribution to permeability

English Heritage: Seeing History in the View - The Setting of Heritage Assets, English Heritage (2011)

2.2.6 This document outlines a best practice methodology for understanding and assessing heritage significance within views.

2.3 Research and Evidence

2.3.1 This section refers to the key pieces of research and evidence that have been prepared to inform the preparation of the design guidance within the SPD. Most of the key evidence documents were prepared to inform the strategic design policies in the Core Strategy. As such, there is a more detailed description in the Core Strategy tall building paper and study.

Core Strategy: Borough-wide Strategic Tall Building Study (2010)

2.3.2 This Southwark-wide study was carried out as part of the preparation of the Core Strategy. It sets out the approach and analysis to establish where tall buildings could be accommodated, where they should not be located, and where they could be sensitive, and the potential urban design constraints for the location and design of new tall buildings in these locations.

2.3.3 Based on the analysis, the study sets out a number of locations where tall buildings may be suitable, which includes Blackfriars Road. The study sets out why these locations are suitable for tall buildings, which includes:

- Where we expect higher density development.
- Proximity to major transport hubs, including locations where major infrastructure improvements would improve existing capacity.
- Emphasising a point of civic or visual significance.
- Opportunities for tall buildings to enhance the public realm or improve permeability
- Focus for regeneration and activity
- Appropriate scale and character to the surrounds.

2.3.4 The paper identifies locations where tall buildings would not be appropriate to include: outside action area cores, conservation areas and areas of predominantly low height development.

2.3.5 It also identifies sensitivities where tall buildings are proposed to include: topography, archaeological priority zones, conservation areas and their

settings, listed buildings and their settings, local character, scale and height, and important local views

Core Strategy: Strategic Policy 12 Design and conservation background paper (2010)

- 2.3.6 This paper covers the background and research that has informed the suitable locations for tall buildings as established in Strategic Policy 12 and supporting text contained within our core strategy. It summarises our evidence base, describes our strategy and our reasons for selecting the approach we have taken.

Bankside, Borough and London Bridge Characterisation Study (URS, July 2013)

- 2.3.7 The characterisation study provides detailed analysis of the character of the area including Blackfriars Road and considers future management guidelines. More information about the character of Blackfriars Road is set out in Section 4 and 5 of this study.

Conservation areas

- 2.3.8 Five conservation areas lie either fully or partly within the Blackfriars Road SPD boundary:

- Old Barge House Street (part of).
- Valentine Place (all of).
- King's Bench (all of).
- St George's Circus (part of)
- West Square (part of).

- 2.3.9 Conservation area appraisals set out a detailed analysis of the area, explain why it is considered to be of special architectural or historic interest, and give principles for managing change by setting out a clear intention of the council's approach to its preservation and enhancement. Conservation area appraisals have been adopted for the following two areas:

- *Old Barge House Street*

- 2.3.10 Located at the north-west corner of the borough, the Old Barge House Street conservation area was originally designated on 21/02/83. An extension to the area was designated on 04/08/88. The conservation area continues on from the South Bank conservation area, designated by the London Borough of Lambeth.

- *St. George's Circus*

- 2.3.11 St. George's Circus is located in the north west of the borough at the southern end of Blackfriars Road. The conservation area was designated on 23

October 2000 and includes the Circus, the western end of Borough Road and the northern end of London Road. On its south western side it adjoins the West Square conservation area, which was designated in 1971. The remainder of the conservation area is covered by the adopted Elephant & Castle SPD/OAPF area (2012)

2.3.12 In addition, the following conservation areas lie adjacent to the SPD boundary across the borough border in Lambeth:

- *South Bank*

2.3.13 A nationally important collection of 20th Century buildings fronting the South bank of the Thames. The earliest significant building is County Hall, dating from the 1920s. The majority of buildings date from the post-war reconstruction. The Royal Festival Hall (Grade I), the centrepiece of the Festival of Britain site, acted as a catalyst for the development of the whole area.

- *Waterloo*

2.3.14 Waterloo Conservation Area represents more than a century of development located close to the south bank of the Thames. It reflects the changing fortunes of the area through the late 18th, 19th and early 20th centuries. The Conservation Area includes parts of Cornwall Road, Stamford Street and Waterloo Road. The mix of building types and uses ranges from former terraces to large commercial buildings.

- *Roupell Street*

2.3.15 John Palmer Roupell developed the Lambeth Estate from the 1820s to 1840s. The development has uniform terraced houses incorporating corner shops and a public house. The streets, Theed St, Roupell St and Whittlesey St, represent an impressive and little altered example of their type.

- *Mitre Road & Ufford Street*

2.3.16 A small but pleasing development of flats and terraced houses erected by the Church Commissioners in the 1900s. Both Mitre Road and Ufford Street benefit from unified architectural treatments: repetitive building types and common materials provide a strong character. A small recreation ground and mission hall on the corner of Ufford Street and Webber Street is also included in this Conservation Area.

Elephant and Castle Supplementary Planning Document (2012)

2.3.17 St. George's Circus marks the southern gateway of the Blackfriars Road SPD area. This important and historic node and junction also lies within the Elephant and Castle Opportunity/SPD area.

2.3.18 The Elephant and Castle Supplementary Planning Document (SPD) sets out our vision for the Elephant and Castle opportunity area. It provides a framework which will guide development over the next 15 years, ensuring that regeneration is coordinated and sustainable.

2.3.19 The SPD provides guidance on:

- The mix of shops and other activities which will be provided
- The amount of new homes that may be built and their location
- The size and design of new buildings
- Public realm improvements
- The infrastructure needed to ensure that growth in the area can be accommodated sustainably, including improvements to public transport, open spaces, health facilities and schools.

2.3.20 The SPD was adopted by Cabinet on 20 March 2012, and is also an opportunity area planning framework (OAPF) that will be used by the Mayor of London to guide his decisions on planning matters in the area. The SPD replaced the Elephant and Castle Enterprise Quarter SPD (2008) and the Walworth Road SPD (2008).

Elephant and Castle Urban Design background paper (2012)

2.3.21 This document sets out the approach and analysis to establish the urban design and building height strategy in the Elephant and Castle Opportunity Area. The purpose of the document is to set out the findings of this document have informed the guidance set out in the Elephant and Castle SPD/OAPF. The document should be read alongside the Elephant and Castle Opportunity Area Characterisation Study, November 2011, as well as relevant conservation area appraisals.

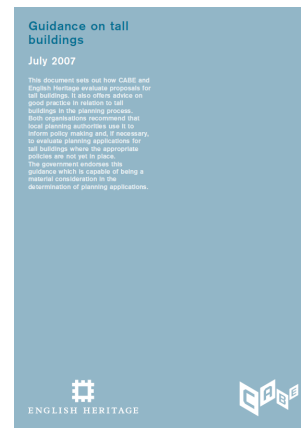
Section 3: Approach to preparing an urban design study

3.1 Our approach

- 3.1.1 This section summarises the approach we have followed to prepare this study.
- 3.1.2 We have looked at the following analysis:
 - Understanding of the local character and historic context through a detailed characterisation study.
 - Identifying areas with the capacity to accommodate substantial change and the sensitivities for new development in these locations.
 - Assessing the potential impact of new buildings including tall buildings.
 - Producing design, conservation and building height guidance in order to manage change.

Methodology for an urban design study

- 3.1.3 CABE and English Heritage Guidance on tall buildings suggests that local authorities conduct a detailed urban design study in order to identify locations where tall buildings are “appropriate, inappropriate and sensitive”.
- 3.1.4 In accordance with CABE and English Heritage guidance and NPPF framework for conservation of the historic environment, we have prepared this detailed urban design and tall building study. Our approach is also informed by other relevant English Heritage best practice guidance on local plan preparation in accordance with NPPF, settings, views, heritage conservation and understanding place.



- 3.1.5 This urban design study consists of two main parts:
 - Character appraisal and evaluation of the analysis to inform our approach and guidance in the SPD. This analysis is set out in Section 4 and 5 of this study. It is important to understand the character of an area when preparing urban design and building heights guidance. The Bankside Borough and London Bridge Characterisation Study (July 2013) includes detailed analysis that helps us to understand the local context and historic character of Blackfriars Road and its surrounding area.
 - Assessment of options for building heights and tall building to inform our approach to building height and tall building guidance in the SPD. This analysis is set out in Section 6 of this study.

Section 4: Blackfriars Road SPD area context and character

4.1 Understanding the character of Blackfriars Road SPD area

4.1.1 Much work has been carried out already to ensure a full understanding of the character of Blackfriars Road and the surrounding area which has informed the preparation of this study. This includes:

- Bankside, Borough and London Bridge characterisation study (2013)
- Conservation area appraisals
- Core Strategy: Borough-wide strategic tall buildings study

4.1.2 The following section draws out key information from the studies to summarise the character of the Blackfriars Road SPD area to help provide a framework for our approach to urban design and building heights. It should be read alongside the relevant sections of the SPD and the detail in the studies.

4.2 Blackfriars Road - context and character

4.2.1 The Blackfriars Road SPD area is sited at the north western edge of Southwark, bordering Lambeth to the west, and City of London and the River Thames to the north. The boundary sits within the Bankside Borough and London Bridge (BBLB) Opportunity Area. The southern edge of the SPD area, around St. George's circus overlaps with the Elephant and Castle Opportunity Area.

4.2.2 The River Thames which lies at the northern edge of the SPD boundary has its own special context with consistent building heights, frontage, views, vistas and landmarks contributing to the distinct riverside setting. Development within the Thames Policy Area is expected to be designed carefully continue to protect and enhance the river environment and the contribution it makes both locally and to London as a whole.

4.2.3 The area covered by the Blackfriars Road SPD is made up of a two character areas (as set out within the characterisation study) – Blackfriars Road North and Blackfriars Road South. The SPD contains guidance for built form (SPD 4) and heritage and building heights (SPD 5). SPD 3 (Public realm and open space) sets general principles for the whole area. St. Georges' Circus is a conservation area and its historic value must be considered as part of any development. The Thames Path comes under the Thames Policy Area and requires special consideration to ensure that development in this area is carefully designed to protect the riverfront. SPD 3 provides additional principles for both the Thames Path and St. Georges Circus. Core Strategy Strategic Policy 12 – Design and conservation has further detail on heritage assets and the Thames Policy area.

The wider context

4.2.4 The SPD area is located within the Central Activities Zone, which generally implies that development is suitable for higher levels of development. London

Plan Policy 2.13 (Opportunity Areas and Intensification Areas) designates London Bridge and Bankside as an opportunity area. London Plan policy 2.13 'Opportunity Areas and Intensification Areas' designates London Bridge and Bankside and Elephant and Castle as Opportunity Areas. These are identified (see Map 2.4 of the London Plan) as the cities' major locations with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility. Typically they can accommodate at least 5,000 jobs or 2,500 new homes or a combination of the two, along with other supporting facilities and infrastructure. Section 7 of the London Plan covers policies and guidance that relate to urban design and tall buildings. Policy 7.7 and advises that the location of tall buildings should generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport.

- 4.2.5 Furthermore, as set out in the Core Strategy Policy 5, the SPD area is located within the opportunity areas of Borough, Bankside and London Bridge and Elephant and Castle, densities may exceed the maximum densities for the Central Activities Zone designation (650 – 1100 hr/ha) provided that developments are of an exemplary standard of design.
- 4.2.6 The Core Strategy (2011) also identifies both opportunity areas as growth areas, which can accommodate significant change. In particular Core Strategy policy 12 requires that the height and design of development conserves and enhances strategic views and is appropriate to its context, the historic environment and important local views. It also requires tall buildings to have an exemplary standard of design and make a positive contribution to regenerating areas and creating unique places. The policy identifies locations where tall buildings could go to include the northern end of Blackfriars Road and Elephant and Castle. The supporting text to the policy provides further information including cross referring to London Plan policy 7.7 and that locations for tall buildings need very good access to public transport.
- 4.2.7 The supporting text to policy 12 also sets out that the council will work with the GLA, English Heritage and CABE to prepare detailed guidance for appropriate tall building locations, heights and design in planning documents. Similarly the Core Strategy vision for Bankside and Borough sets out that we will set out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document/opportunity area framework.
- 4.2.8 The Core Strategy borough-wide strategic tall buildings study (2010) sets out evidence on the general character of the borough and highlights the areas where tall buildings could be located, which are generally in areas with the following character:
- Potential for high density development,
 - Proximity to major transport hubs which could cater for potential increase on demand,
 - Emphasise a point of civic or visual significance,
 - Enhance public realm and improve permeability,
 - Focus for regeneration and activity,
 - Relate to existing scale and character.

The SPD area

- 4.2.9 The SPD area has a well defined set of characteristics, making it an ideal environment to create a prominent road of mixed activity, lively and permeable pedestrian streetscape of varying scales, as well as landmarks marking the route between Elephant and Castle, Waterloo and the river and to the City.
- 4.2.10 Blackfriars Road is a historic north south boulevard. The civic character of area is reinforced by the large scale, massing and heights of buildings on Blackfriars Road and the Thames riverfront to the north. The main east west routes come off the main spine at the Stamford/Southwark Street, The Cut/Union Street and St. Georges Circus junctions. The large footprints and wide setbacks along Blackfriars Road reinforce the boulevard character of the street and contrast with the smaller grain and lower height buildings on the quieter side streets. The area can be broadly analysed as 3 sections – Blackfriars North, Blackfriars Road South and St. Georges Circus (also within the Elephant and Castle Opportunity Area). Sequences of historic railway arches and viaducts create a distinctive urban environment within the area and lie across its centre and close to its eastern boundary
- 4.2.11 Land use in the area is mixed with areas of residential and commercial use alongside other uses, including industrial, retail and hotel uses. The majority of the area off Blackfriars Road comprises building heights ranging from 2-8 storeys. There are a number of tall buildings dotted along the axis of Blackfriars Road, ranging from 8-16 storeys, with a cluster of tall buildings to the north of Blackfriars Road, both existing and consented. These range from 16-50+ storeys.
- 4.2.12 Presently, the Blackfriars Road area consists of a hierarchy of streets and spaces that have a range of functions. A significant proportion of the existing public realm in the area is of low quality. Some streets and spaces suffer from neglect and are under-used, while others bear heavy traffic and footfall during peak times. A large part of Blackfriars Road and the surrounding streets and spaces have dead frontages which create poor quality environments that people do not engage with. Improvements to the public realm will make streets and spaces more enjoyable, legible and vibrant.

Open spaces

- 4.2.13 The quality of many open spaces is generally quite high, although there is still some scope for improvement. The Southwark Open Space Strategy has identified that the north of Blackfriars Road is deficient in access to all park types. Around 2% of the SPD area is protected open space. The three protected open spaces in within the SPD boundary are: Christchurch Gardens, Paris Gardens and Nelson Square Gardens.

Views

- 4.2.14 The Tower of London and Houses of Parliament World Heritage Sites are situated within the wider context of the SPD area as well as a number of strategically important landmarks and views. There is rich sense of history here, with an abundance of heritage assets including five conservation areas, the Borough Bermondsey and Rivers Archaeological Priority Zone and several heritage buildings.

4.2.15 Some of the views identified include:

- St. Paul's Cathedral
- Protected vistas
 - LVMF 1A.2 -Alexandra Palace to Central London
 - LVMF 8A.1 -Westminster Pier to St Pauls
 - LVMF 9A.1 - King Henry VIII - Richmond to St Pauls
 - LVMF 23A.1 - Bridge over Serpentine to Westminster
- Townscape Views
 - LVMF 26A.1 - St James' Park to Horse Guards Road
 - LVMF 27A 1&2 - Parliament Square to Palace of Westminster
 - LVMF 27B.1 - Parliament Square: North Pavement

4.2.16 Views are important for understanding the character of an area. These views may relate to particular routes or views established through history. They may also be views of a specific focal point, such as a landmark or a space, or may be a wider ranging view from a high point in the area. In Blackfriars Road a number of views have been identified through site visits, the work on the characterisation study and other area based studies.

4.2.17 There are also a number of other views in the area which enable us to understanding the local character, and can aid orientation and way finding. These views can be from inside the opportunity area or from the wider area.

4.2.18 These include:

- Historic views which are axial or focused views to particular heritage assets or landmarks
- Views along main axis or key approaches into the opportunity area
- Views of or from within the setting heritage assets
- Views of or from within open or public spaces
- Views of buildings of local importance

4.2.19 The identification of views has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

4.3 Borough, Bankside and London Bridge Characterisation Study (2013)

4.3.1 The Borough, Bankside and London Bridge Characterisation Study (2013) provides detailed analysis of the character of the area including Blackfriars Road and considers future management guidelines.

4.3.2 The characterisation study identified nine character areas including Blackfriars Road North and Blackfriars Road South.

- Blackfriars Road North
- Blackfriars Road South
- Bankside Cultural
- Bankside Commerce and Industry
- Borough Market

- The Borough
- Borough High Street
- London Bridge
- Bermondsey

4.3.3 These areas are identified and informed by the following characteristics:

- Historical development - including street pattern, land use, conservation areas and heritage assets;
- Movement - including physical boundaries such as railway viaducts, roads and the River Thames and gateways, nodes and linkages;
- Urban structure and built development - including density and building height, enclosure, architectural style and detailing;
- Land use and levels of activity;
- Public realm and open space - including those with planning policy and statutory protection, and how this relates to buildings and spaces; and
- Views and their contribution to an understanding of character, including the identification of landmarks.

4.3.4 The next section in the study, 'Understanding quality, issues and sensitivity' looks at those elements of character which are particularly valued, changing or sensitive. A set of guiding character management principles for the area is then determined. For each character area, the key characteristics are set out and include:

- Qualities of the character area which should be sustained, reinforced or enhanced through managed change;
- Issues to be addressed;
- Elements of character which are particularly sensitive to change

4.4 The character areas

4.4.1 The following section sets out a summary of the two character areas identified which are relevant to the SPD: Blackfriars Road North and Blackfriars Road South. These summaries should be read alongside the detail as set out in the characterisation study, appropriate conservation area appraisals and the SPD itself.

Location and Summary

4.4.2 The Blackfriars North character area extends from the Thames riverfront and South Bank southwards to the railway viaducts, just below Scoresby Street. Blackfriars Bridge is located at the northernmost point of land in the BBLB Opportunity Area and marks the location of an historic gateway into the City of London to the north. Blackfriars Road, a broad north/south Georgian boulevard forms the primary route through this character area. The area is defined by the River Thames to the north and railway viaducts to the south and east; Lambeth lies to the west.

4.5 Blackfriars Road North

Historical Development

- 4.5.1 Settlement in Blackfriars North developed in medieval times, with housing following the line of the river along Upper Ground. In Tudor times the area became known as a place of entertainment, notably the Swan Theatre. By the mid-late 17th century building moved southwards and Christ Church was consecrated to serve the growing population. In 1769 Blackfriars Bridge was opened and permission granted for a new road to run directly south from Blackfriars Bridge St. George's Circus. This was a catalyst for further development to the south, east and west.
- 4.5.2 By 1834 the entire area had been developed with continuous frontage to the primary routes. Terraced housing was located in the smaller streets to the east, and factories and warehouses to the north and west. The River Thames, still a major trade route, was served by wharves which filled the embankment. By 1862, railway lines extending south from the City defined the southern and eastern edges to the whole SPD area, breaking up the cityscape into a smaller grain.
- 4.5.3 Heavy bombing in WWII and the decline in river trade led to substantial redevelopment. Large-scale clearance and re-use of warehouses in the 70s and 80s led to larger commercial, mixed use developments such as the OXO Tower. Post-war development saw the introduction of a number of tall buildings, which feature strongly in local views and from the north bank of the Thames such as the Sea Containers House.

Movement

- 4.5.4 Blackfriars Road is a strategic road, forming part of the Transport for London Road Network (TLRN) managed by TfL. It is a major arterial route into central London, accommodating bus and cycle lanes and generous pavements, widening-out further as it approaches Blackfriars Bridge. The bridge forms an important gateway into Southwark where it meets the River Thames. There are significant linkages running from east to west through the SPD area, which facilitate movement between key transport interchanges at Waterloo, Blackfriars and London Bridge.
- 4.5.5 The whole of the SPD area has excellent public transport accessibility (PTAL) of 6a or 6b, the highest possible rating. The area is sandwiched between Waterloo and London Bridge, two of London's busiest interchanges. The Blackfriars North character area benefits from the newly rebuilt Blackfriars Station, and along with Blackfriars Pier, this has led to a steady increase in passenger numbers. The corridor is also served by a number of buses, which provide easy, affordable access to a variety of across London. There are a high number of off-street cycle parking spaces.
- 4.5.6 In contrast to the high levels of activity along the primary routes, the more intricate local streets to the east and west of Blackfriars Road are quieter and narrower. The traditional street pattern allows a high level of pedestrian permeability across the area and beyond. The embankment of the River Thames is free from traffic and allows almost continuous pedestrian access, with steps down to the foreshore in places. The open expanse of the river contrasts with the enclosed streets and courtyards to its south.

Urban Structure and Built Form

- 4.5.7 The size and arrangement of blocks generally adheres to the historic street pattern particularly to the west of Blackfriars Road. However, in places the finer grain of the past has given way to taller buildings occupying larger footprints.
- 4.5.8 The civic scale and character of Blackfriars Road and prominence of the riverfront location is reinforced by the scale, massing and height of buildings fronting Blackfriars Road, Stamford Street and Southwark Street, and along the riverfront. Buildings with active frontages are limited but include the recently completed Ibis Hotel. Heights range from taller height towards the riverfront and north end of Blackfriars Road to a lower stepping down along Blackfriars Road from the height of 240 Blackfriars Road (89m) to lower heights towards the viaduct at the centre of Blackfriars Road (typically around 30m).
- 4.5.9 Taller building heights at the riverfront include Sea Containers House, Rennie Court, Sampson and Ludgate House, providing a generally consistent height (around 40m to 50m). Taller heights are set back from the riverfront with South Bank Tower (109m) and Oxo Tower (67m) establishing an existing context for significantly taller buildings with a number of consented proposals for buildings of similar height or taller, emerging as a cluster. The consented tall buildings will reinforce the area as an important location with 1 Blackfriars (165m), 20 Blackfriars (148m and 105m) and additional floors to South Bank Tower (132m).
- 4.5.10 In the west, blocks are arranged in a loose grid pattern with a mixture of large former industrial perimeter blocks at Hatfields and Paris Garden and more open, set back arrangements such as at King's Reach Tower, Rennie House and Sea Containers House. There is little ground floor activation as much of the development is constructed on podiums. In the north-west, the architecture and open spaces are finer, expressing a strong historical connection, for example the Oxo Tower Wharf mixed-use development, which contains public courtyards and covered galleries.
- 4.5.11 To the east of Blackfriars Road and south of Burrell Street, much of the blocks were merged in the post-war period, creating a coarser layout. Some earlier Victorian have survived on Chancel Street and along parts of the eastern and southern boundaries, the railway arches house a variety of uses.

Land Use

- 4.5.12 Commercial land uses are prevalent along Blackfriars Road with areas of residential development to the south-east and west and mixed-use development in the north and west, fronting the river. Buildings are interspersed with pockets of open space, the largest being Christ Church Garden. The character of this area continues to evolve through the on-going redevelopment of several sites, particularly adjacent to Blackfriars Road, including the construction of further tall buildings.

Heritage Assets

- 4.5.13 There are many historic buildings and features, including important reminders of the area's industrial heritage and riverfront industries. Within the whole SPD boundary, there are 34 Grade II listed buildings and features. There are also many buildings of townscape or historic merit, including Oxo Tower Wharf.
- 4.5.14 Much of the area's character and heritage remains protected by virtue of five adopted conservation areas which cover approximately 14% of the whole SPD area. Barge House Alley and King's Bench Conservation Areas are situated in Blackfriars North. Part of the area is also covered by the Borough, Bermondsey and Rivers Archaeological Priority Zone. The listed Chancel Street terraces in this character area remain intact after the war.
- 4.5.15 The historical open and green spaces also contribute to character of Blackfriars Road. For example, Christ Church gardens, Nelson Square (protected under the London Squares Preservation Act, 1931). There are also some important historic protected trees, including trees in Christ Church gardens and a number of plane trees located adjacent to Blackfriars Bridge.

Public Realm and Open Space

- 4.5.16 The area has limited open space provision and consists primarily of small squares and churchyards typical of a dense urban environment in central London. The spaces protected as Borough Open Land are Nelson Square, Christchurch Gardens and Paris Gardens.
- 4.5.17 Public realm provision is limited within the area, with varying qualities of space, materials and landscaping. Intermittent mature trees along Blackfriars Road reinforce its wide and linear boulevard character. Some streets and spaces offer a high quality public realm, with planting and seating that is well used, for example, a pedestrianised section of Gambia Street, along The Cut and the Oxo Tower development along the riverside.
- 4.5.18 There are a number of roads and spaces that suffer from inactive frontages. Recently, a series of completed and on-going projects has been implemented that improve the pedestrian and public realm experience at key junctions on Blackfriars Road, at the northern end and at the Cut. They seek to improve links throughout the area and encourage increased pedestrian activity.

Views

- 4.5.19 The straight alignment of Blackfriars Road provides dynamic views for people moving along it, with a strong linear focus. From the southern boundary of the character area, views extend north beyond Blackfriars Bridge to Unilever House in the City of London. Views south from Blackfriars Bridge along Blackfriars Road are limited by the railway viaduct on the southern boundary. Street trees and taller buildings are visible beyond, including Palestra. There are occasional views of distant landmarks such as The Shard to the east, for example along Scoresby Street.
- 4.5.20 The tightly contained development of Paris Garden, Hatfields and Upper Ground in the west creates a series of shorter views, contributing to a strong

sense of place. In the east, the railway viaducts prevent views into neighbouring areas at ground level although taller buildings are visible above.

- 4.5.21 The openness of the riverside between Oxo Tower Wharf and Blackfriars Bridge allows a series of panoramic views to the north of the Victoria Embankment with the City of London beyond. St. Paul's Cathedral is visible to the north-east, becoming gradually more screened towards the east by Blackfriars Bridge and Station. From the Victoria Embankment and Blackfriars Bridge, the view composed of Rennie House, Sea Containers House and Oxo Tower Wharf defines the river's edge. The landmark King's Reach Tower and Oxo Tower appear behind and above those buildings, which in combination contribute strongly to the wider view of the South Bank. Wider views from Blackfriars Bridge are discussed in the LVMF River Prospect 14 (GLA, 2012b).

Blackfriars Road South

Location and Summary

- 4.5.22 This character area is broadly defined by brick railway viaducts to the north and east, with Lambeth to the west and the Elephant and Castle opportunity area to the south. Blackfriars Road runs through the centre from the conservation area of St. George's Circus in the south to the railway viaduct. In contrast to the main artery, there are quieter side streets, containing residential, commercial and light-industrial areas to the east and west. The area to either side of Blackfriars Road is characterised by smaller plots.

Historical Development

- 4.5.23 As detailed above, Blackfriars Bridge was opened in 1769 following an Act of Parliament in 1768 granting permission for a new road to run directly south from Blackfriars Bridge through St. George's Fields, which was largely agricultural land. St. George's Circus. This was a catalyst for further development to the south, east and west.
- 4.5.24 St. George's Circus was established as the origin of Blackfriars Road and an important junction with Borough Road, Westminster Bridge Road and London Road. A stone obelisk was placed at the centre of the Circus, as an early means of wayfinding in 1771. It was removed in the early 20th century but replaced again in the 1990's and is Grade II* listed.
- 4.5.25 The 18th century street pattern to the east of Blackfriars Road remains largely intact. However, none of the original buildings in the King's Bench Conservation Area still exist. Much of the early buildings in these areas were dense slums.
- 4.5.26 By 1834 the area was largely developed, with large buildings flanking Blackfriars Road and smaller terraces in the side streets. The 1860s saw the significant arrival of the railways, the arched viaduct still a strong presence today as a northern and eastern boundary. The Magdalene Hospital and Peabody Estate established a precedent for larger developments followed by mainly residential and some industrial development within the areas now covered by the Valentine Place and King's Bench Conservation Areas.

Movement

- 4.5.27 As in the north, the distinctive historic street pattern remains largely intact with Blackfriars Road retaining its broad proportions. The junction at St. Georges Circus remains a key gateway to the area. Southwark Underground Station is a key transport node and reinforces the role of the junction which is used heavily particularly during peak times. Several streets form part of the London Cycle Network including Cycle Superhighway 7 at the south eastern edge of the SPD area.
- 4.5.28 In the residential estates found in the south, there are numerous pedestrian thoroughfares and private areas. The raised railway lines, at the northern and eastern boundaries of the area house the archways, which create street level permeability.

Urban Structure and Built Form

- 4.5.29 The loose grid structure remains as a remnant of the earlier field pattern and this generally dictates the size and arrangement of blocks with varying density. Extensive post-war redevelopment has resulted in a varied and often contrasting mixture of built form and style. The majority of the existing buildings date from the late 19th and early 20th centuries, mainly comprising terraces of small houses. Along Blackfriars Road, redevelopment has maintained Georgian building proportions. Exceptions include Hill House, Vaughn House and Erlang House where building plots have been consolidated, creating large buildings with setbacks and no active frontages. At the southern end of Blackfriars Road, buildings are generally arranged to front St. Georges Circus with concave fronts which follow the line of the circus.
- 4.5.30 Building heights are between 5m and 36m, lower than in the neighbouring Blackfriars Road North character area. Active frontages along Blackfriars Road are limited to bars, restaurants and shops, such as those between Webber Street and Valentine Place, The Cut and Union Street. Southwark tube station, the node at where these roads meet is emphasised by the modern and prominent Palestra building which is taller than those it surrounds, standing at 56m. Heights heading south towards St George's Circus are generally consistent (typically 20 to 30m), though the scale of heights varies between the east and west side.
- 4.5.31 To the east and west of Blackfriars Road, blocks range in size and shape. Long, narrow blocks have been retained, particularly where older workshop and warehouse buildings front directly onto the street, creating distinct edges. This more tightly contained development occasionally features taller buildings such as at Boundary Row. Housing blocks tend to be large and open, with buildings generally between 11m and 20m in height.

Land Use

- 4.5.32 Blackfriars South is predominantly residential land with pockets of other uses including offices, light-industry and education. Creative industries are a feature, particularly around Boundary Row, Surrey Row and Webber Street. Mixed-use development is limited to offices and dwellings above shops, bars and restaurants.

Heritage Assets

- 4.5.33 The character area contains parts of four conservation areas; King's Bench, Valentine Place, St. George's Circus and a small part of West Square. The King's Bench Conservation Area is characterised by a cohesive townscape comprising of residential, religious and industrial buildings of mostly below 10m in height. The Valentine Place Conservation Area has a considerable collection of industrial and warehouse developments from the late 19th and early 20th centuries on the west of Blackfriars Road. St. George's Circus is an example of Georgian town planning on a grand scale and contains a number of notable buildings of that period. An example of high quality late Georgian and mid-19th century townscape is provided by the portion of West Square Conservation Area, located to the north of Westminster Bridge Road. All Conservation Areas contain listed buildings or buildings of local interest.
- 4.5.34 The Grade II* listed obelisk which formed the original termination to Blackfriars Road was replaced in 1998, having been moved to a nearby park in 1897. Its setting is now provided by the Circus, which is a busy roundabout linking several major roads and buildings of various architectural styles, mostly dating from the 20th century.
- 4.5.35 Some notable buildings in the area include the Cathedral of St. George by Pugin, rebuilt after WWII, and one former convent and chapel in Rushworth Street. A few houses on Nelson Square provide the sole remains of one of the few Georgian Squares in south London. The terraced housing on King Edward Walk and the later Draper's Almshouses reflect the smaller grained townscape of the early 19th century. The Peabody Estate of is an early example of philanthropic housing rising to 7-10 storeys and contributes to the character of the southern end of Blackfriars Road. Some early London County Council blocks lie to the eastern side of Blackfriars Road.

Public Realm and Open Space

- 4.5.36 St. George's Circus at the southern end of Blackfriars Road suffers from a poor quality public realm, and there is strong potential for public realm improvements to enhance its environment as an important gateway to Blackfriars Road and Elephant and Castle. The wide pavements of Blackfriars Road are lined by mature street trees which reinforce its linear boulevard character. Along The Cut, public seating has been created by using some of the paving space and contemporary lighting schemes have been installed beneath some key railway arches in the area.
- 4.5.37 Nelson Square is the largest and only open space in the character area. It is protected under the London Squares Preservation Act 1931 and is Borough Open Land. It originally connected directly to Blackfriars Road, before being remodelled after the war. Formal open space elsewhere is limited within the residential estates in the south, pockets of shared open space and some mature trees surround larger buildings and edge blocks.
- 4.5.38 The conservation area contains a number of mature London Plane trees in Borough Road, London Road and around the Circus. These are a major characteristic of the conservation area and should be retained. Conservation Area status helps to protect the trees, as permission is required for their removal.

Views

- 4.5.39 The straight alignment and continuity along Blackfriars Road create long, linear views as they do in the northern character area. Similarly the railway lines which enclose the north and east obstruct views. Views to the south are focused towards St. Georges Circus obelisk and views to the north are partially screened by the railway viaduct and the Palestra building which forms a landmark. The London Eye to the west is visible along Ufford Street and the Shard is visible to the east along Pocock Street and Union Street.
- 4.5.40 The variety in the street pattern, building heights and form presents a range of mostly short or medium distance views to the east and west of Blackfriars Road.
- 4.5.41 The protected vista LVMF 27A.2 from Parliament Square to the Palace of Westminster – a World Heritage Site - intersects the area above St George's Circus at the southern end of Blackfriars. This designation should be considered in relation to potential building heights at this junction. Further protected vista and river prospects that impact the SPD area should also be considered.

Section 5: Urban design in Blackfriars Road

5.1 Urban design framework

5.1.1 The purpose of this section is to outline an urban design framework and objectives for the area that address the urban design issues and opportunities that have been identified through the preparation of the SPD. These are issues that we need to address to help us establish the emerging vision for the SPD area. They include the protection of positive aspects of existing character, addressing negative factors and identifying opportunities for development.

5.1.2 The characterisation study has provided a basis for understanding some of the issues and opportunities for change in the built environment. The study identifies nine different character areas, including Blackfriars Road North and Blackfriars Road South. These areas are identified, informed by the following characteristics:

- Historical development - including street pattern, land use, conservation areas and heritage assets;
- Movement - including physical boundaries such as railway viaducts, roads and the River Thames and gateways, nodes and linkages;
- Urban structure and built development - including density and building height, enclosure, architectural style and detailing;
- Land use and levels of activity;
- Public realm and open space - including those with planning policy and statutory protection, and how this relates to buildings and spaces; and
- Views and their contribution to an understanding of character, including the identification of landmarks.

5.1.3 The next section in the study, 'Understanding quality, issues and sensitivity' looks at those elements of character which are particularly valued, changing or sensitive. A set of guiding character management principles for the area is then determined. For each character area, the key characteristics are set out and include:

- Qualities of the character area which should be sustained, reinforced or enhanced through managed change;
- Issues to be addressed;
- Elements of character which are particularly sensitive to change

5.2 Approach to area wide and character area specific urban design guidance

5.2.1 The urban design framework seeks to ensure good quality design and heritage protection to achieve the vision for the SPD area. The design and heritage objectives address some of the key urban design issues, constraints and opportunities that have been identified across the SPD area, and underpin the area-wide built environment guidance including the local character and historic environment, public realm and open space, built form and building heights. The principles, additional principles and guidance in the SPD which has been informed by the approach are:

- SPD 3 Public realm and open space
- SPD 4 Built form and heritage
- SPD 5 Building heights

5.2.2 Our approach to built environment guidance includes the following:

Public realm and open space

5.2.3 Improving the quality and cohesiveness of the public realm and open spaces by enhancing the area's identity, character and attractiveness with landscaping and lighting to create new, inclusive public spaces with better legibility and increased activity. The creation of new public spaces can also enhance the public realm, particularly as there is a need for more formal open space in the area and because much of the public realm is of a mixed quality.

5.2.4 Good examples of public realm exist along the wide riverfront public realm integrating with the buildings facing onto it. The courtyards of the Oxo Tower Wharf and the embankment are examples of where high quality materials have been consistently and coherently applied. The public realm and planting scheme along the pedestrianised section of Gambia Street and the improved streetscape and contemporary lighting schemes installed beneath key railway arches are example of what we intend to achieve.

5.2.5 This approach has informed SPD 3 Public realm and open space

Heritage

5.2.6 Preserving and enhancing the significance of the area's heritage assets and their settings. Our guidance will need to ensure new development and tall building heights preserves and enhances the significance of heritage assets, especially with consideration of locations within or around the setting of conservations areas, listed buildings and protected squares, as well as strategic views.

5.2.7 This approach has informed SPD 4 Built form and heritage

Built form

5.2.8 Ensuring that new buildings and blocks enhance the character of the area, with appropriate grain and scale. Improving permeability where possible and create active frontages at ground level to encourage better integration with the public realm in areas such as along Blackfriars Road and around St. George's Circus.

5.2.9 This approach has informed SPD 4 Built form and heritage

Building heights

5.2.10 Ensuring building heights are appropriate to their context, while optimising the area's development potential and creating a new, legible destination within central London is the focus of this guidance. It is recognised that the area has significant development pressure due to its central London location.

Exemplary standards of design are required, as well as links to new public spaces, and the careful consideration of cumulative relationships and the impact on amenity and heritage assets and views.

5.2.11 Although the emerging cluster at the northern section of Blackfriars Road is established, the two nodes at Southwark tube station and towards St. George's Circus, and the southern section of Blackfriars Road required further work to understand the development potential and context. This is set out in section 6 of this study.

5.2.12 This approach has informed SPD 5 Building heights

5.3 Capacity for change

5.3.1 Through the exploration of the character of the Blackfriars Road area and following the emergence of the consented tall building cluster at the northern end of Blackfriars Road, it becomes apparent that there is significant opportunity for change along the length of Blackfriars Road, which would optimise its potential as a new destination and avoid piecemeal development.

5.3.2 The Blackfriars Road SPD area is located in the Central Activities Zone (London Plan Policy 2.10) and the London Bridge, Borough & Bankside Opportunity Area (London Policy 2.13) and will see significant change. London Plan policy 7.7 and Core Strategy strategic policy 12, identify that the area may accommodate tall buildings. In light of this and following the adoption of the Elephant and Castle SPD/OAPF which outlines new significant town centre development at the Elephant and Castle, a detailed assessment is now required for the length of Blackfriars Road and the wider SPD area which links these two growth areas. The assessment determines the locations where tall buildings could be suitable, the potential heights of these buildings and the potential impact of proposals at those heights, particularly in sensitive locations, such as the setting or view of a heritage asset.

5.3.3 At present we can see that the SPD area has a mixed quality of public realm and new development provides many opportunities to improve the amount and quality of the public realm and east/west links.

5.3.4 Section 6 sets out a detailed assessment which explores the urban design issues, opportunities and constraints to inform the analysis of building heights and tall buildings Blackfriars Road SPD area and the sensitivities the surrounds.

Section 6: Building heights and tall buildings in the Blackfriars Road SPD area

6.1 Preparing building height and tall building policy and guidance

6.1.1 During the preparation of the SPD, the SPD area has been analysed and four main areas/locations have been identified as having potential for tall buildings:

- the northern section of Blackfriars Road as adopted by the Core Strategy
- the node at the junction of Blackfriars Road, The Cut and Union Street, and Southwark tube junction
- the southern section of Blackfriars Road area between Southwark tube junction and St. George's Circus nodes
- St. George's Circus.

6.1.2 In section 5 of this paper we have set out that more detailed analysis to understand where tall buildings could be located in the SPD area and understand the impacts on sensitivities for tall building development in these locations.

6.1.3 This section of the document sets out the further urban design analysis that informs our approach to building heights and potential locations for tall buildings which will inform the guidance in the SPD. A number of criteria will inform this assessment, including relationships to potential opportunities, relationships to transport hubs and potential impact in the wider area. Saved Southwark Plan Policy 3.20 sets out criteria regarding the specific requirements for tall buildings. These include that tall buildings should

- Have links to public transport
- Provide a positive contribution to landscape
- Be located at point of landmark significance
- Be of the highest architectural quality
- Relate well to its surroundings, particularly at street level
- Contribute positively to the skyline as a cluster or key focus within views

6.1.4 This section sets out the following analysis for the SPD area to inform the approach to building heights:

- Understanding the strategic vision and urban design strategy for the Blackfriars Road SPD area.
- Summary of the building height and tall building opportunities and constraints.
- Identifying where we would test tall building options, where we would not test and the sensitivities to be assessed through testing.
- Identifying, testing and assessing strategic building height options.
- Developing building height policy and guidance.

6.2 Strategic Vision and Urban Design Strategy

Strategic Vision

- 6.2.1 London Plan Policy 2.13 Opportunity Areas and Intensification Areas designate London Bridge and Bankside as an opportunity area. Section 7 covers policies and guidance that relate to urban design and tall buildings, and makes reference to limiting the location of such buildings to opportunity areas.
- 6.2.2 Within the Core Strategy, the Bankside, Borough and London Bridge vision and Strategic Policy 12, indicate that tall buildings may be appropriate around Blackfriars Road and must be of exemplary standard of design. The supporting text for policy 12 (paragraphs 5.113 - 5.115) explain that further detail on where tall buildings will be appropriate, inappropriate and sensitive will be undertaken.
- 6.2.3 Through the development of the SPD, we have set out an emerging vision for the Blackfriars Road area and included more detail for the SPD area. The approach to our urban design study has been informed by the opportunities highlighted in the vision. In turn the outcomes of the characterisation study and this urban design and tall building study will also refine the guidance set out for Blackfriars Road which we will look at developing further as we prepare the New Southwark Plan.
- 6.2.4 The emerging vision describes an area with its own distinct identity, one that is lively and vibrant, becoming an exciting place where people want to work, live and visit. The road and its surroundings will have its own identifiable character, providing a range of different activities opening up onto Blackfriars Road. A cluster of tall buildings around the northern end of Blackfriars Road is intended to provide high quality offices, housing, hotels and shops. These buildings will be of exceptional design and will enhance the look of the area and provide new public spaces.
- 6.2.5 New development will recognise and enhance the different character and roles of places across London Bridge, Bankside and Borough Opportunity Area. These are focused around several key areas including Blackfriars Road and the riverfront. Managing change in this area should focus on sustaining or enhancing historic features whilst encouraging development which reinforces its position as a gateway to the City of London, to the wider Bankside, Borough and London Bridge area from the south and also Elephant and Castle. Improvements to the movement network and public realm and as part of development proposals will also help to achieve this. Key principles for change should address connectivity across Blackfriars Road, the need for a balance of mixed-use developments and open space should be addressed as well as the need to ensure that buildings create active frontages to the street.
- 6.2.6 There have been many changes over recent years, including the refurbishment of Blackfriars Station with a new entrance on the south side of the river, four new hotels and over 300 new homes. More change is planned, with much development already under construction. Development has included new commercial, retail, and residential buildings and associated streetscape improvements. Figure 6 in the SPD highlights the number and

size of the many potential development sites that could see different types of development from public realm, refurbishment or new buildings.

Urban Design Strategy

6.2.7 The urban design strategy for the Blackfriars Road SPD has been informed by the management principles set out in the characterisation study as well as the strategic visions and overarching policy in the documents outlined above.

- The newly refurbished Blackfriars Road station with its new southern entrance is a major recent development which has made riverside attractions as the Globe Theatre and the Tate Modern gallery more accessible. The refurbishment adds to the passenger capacity of the network and will support further development in the area. The status of the gateway at Blackfriars Bridge should be further enhanced through improvements to the public realm particularly signposting towards the river.
- The status of Blackfriars Road as a primary route and its distinctive boulevard character should be reinforced. Existing and new pedestrian and vehicular movement is an opportunity to create lively, viable mixed-use and can be enhanced through improvements to public realm and active frontages along and around Blackfriars Road, Stamford Street and Southwark tube station. Active frontages should foster interaction with the wide pavements, in particular at the node of The Cut/Union street. Buildings which front the primary routes should be of an exceptional architectural standard and respond to the building line and context.
- New development should reinforce the pattern, enclosure and alignment of historic streets and blocks where possible and should enhance and reflect the individual characters of the local conservation areas, for example Barge House Street, Valentine Place and King's Bench for their industrial and warehouse architecture; St. George's Circus as a key node at the origin of Blackfriars Road; and West Square for its Georgian and mid-19th century townscape. . New development should also enhance the openness of the River Thames embankment, including views of the City of London skyline and in particular, the dome of St. Paul's Cathedral.
- Development on large sites should create the opportunity for additional permeability thus creating new public space within the larger opportunity sites adjacent to Blackfriars Road. This would greatly enhance the public realm in the neighbourhood. Breaking up large facades along this main axis whilst encouraging a diversity of uses and tenures will allow a rich variety of buildings to emerge.
- Taller buildings may be appropriate to enhance the status of the northern riverside gateway, the nodal junction at The Cut and Union Street and the main junction of St. Georges Circus in the south. The scale and height of development should step down along Blackfriars Road and into the areas to the east and west of Blackfriars Road to reinforce the existing qualities in these areas.
- The development of railway arches which form the southern and eastern edges of the area should be promoted to encourage a broader range of

uses and activity in the surrounding streets. This may include the introduction of commercial or cultural and creative uses, such as galleries, workshops innovative lighting and public art schemes.

- There should be a focus on enhancing the quality and legibility of the public realm of the primary routes, particularly along Blackfriars Road, St George's Circus, Stamford Street, Southwark Street, along the Thames Path the junction around The Cut/Union Street/Southwark Underground Station and space adjacent to viaducts. Public realm proposals should have a focus on providing an integrated network of open spaces – which is currently strongly lacking. There is potential to improve landscaping and facilities at Christ Church Gardens to address a deficiency in park provision in the Bankside area High quality public realm schemes, tree planting, street furniture and signage could all provide a much needed upgrade to the area. The removal of street clutter and improving the legibility of the side streets should also be considered to reinforce connections with the wider area to the east and west.

6.2.8 Our urban design analysis has highlighted some strategic opportunities and constraints to be considered. These inform where tall buildings may be more suitable and other areas where tall buildings are likely to be sensitive. The analysis of constraints and opportunities has considered the following:

- Public Transport Accessibility Levels (PTAL) and public transport network
- Locations with the capacity to support intense development
- Opportunity for new links and public realm
- Contextual building heights
- Conservation areas and their settings
- Listed buildings and structures and their settings
- Buildings and structures identified on the local list
- Archaeology and Archaeological Priority Zones
- Open spaces
- Views

6.3 Summary of building height and tall building opportunities and constraints

- 6.3.1 The vision for the Bankside, Borough and London Bridge Opportunity Area outlined in the Core Strategy (paras 4.07 - 4.19) promotes new development throughout the area, the largest being around Blackfriars Road and Bankside, with a cluster of tall buildings around the northern end of Blackfriars Road providing high quality offices, housing, hotels and shops and retail opportunities.
- 6.3.2 We have an emerging vision for the Blackfriars Road area (para 2.2.3) in the SPD which sets out some ideas which we will look at developing further as we prepare the New Southwark Plan. The New Southwark Plan will replace the Core Strategy and saved Southwark Plan policies, providing new policies and visions for Southwark.
- 6.3.3 As set out in section 5 of this study, the Bankside, Borough and London Bridge characterisation study has established that there is potential for further tall buildings within the emerging cluster at the northern end of Blackfriars Road, to reinforce this gateway location.
- 6.3.4 It is now also recognised that due to the scale of existing and potential growth proposed along the remainder of Blackfriars Road, that there is a need to ensure development takes place in a coordinated way and avoids piecemeal development. Tall buildings are an opportunity to maximise the potential of some of the development sites along the road, provided that they are appropriate for their context.
- 6.3.5 The management principles set out in the characterisation study and our urban design analysis has highlighted some strategic opportunities and constraints to be considered. These inform where tall buildings may be more suitable. There are also policy constraints and other areas where tall buildings are likely to be sensitive. This study has informed the analysis to prepare strategic building height options. The analysis of constraints and opportunities has considered the following:
- Public Transport Accessibility Levels (PTAL) and public transport network
 - Locations with the capacity to support intense development
 - Opportunity for new links and public realm
 - Contextual building heights
 - Conservation areas and their settings
 - Listed buildings and structures and their settings
 - Buildings and structures identified on the local list
 - Archaeology and Archaeological Priority Zones
 - Public realm and open spaces
 - Strategic and local views
- 6.3.6 The following sections set out a summary of the findings of our analysis which has informed the locations where we would test strategic options for building heights and tall buildings:

Public Transport Accessibility Levels and public transport network

- 6.3.7 The majority of the Blackfriars Road area has a high Public Transport Accessibility Level (PTAL). The main focus for transport is around new Blackfriars station at the northern end of Blackfriars Road and Southwark tube station at the junction of The Cut and Union Street. Numerous buses routes are located on the main routes through the area.
- 6.3.8 It would generally be more appropriate to locate tall buildings in a location of high PTAL and close to a main public transport hub.

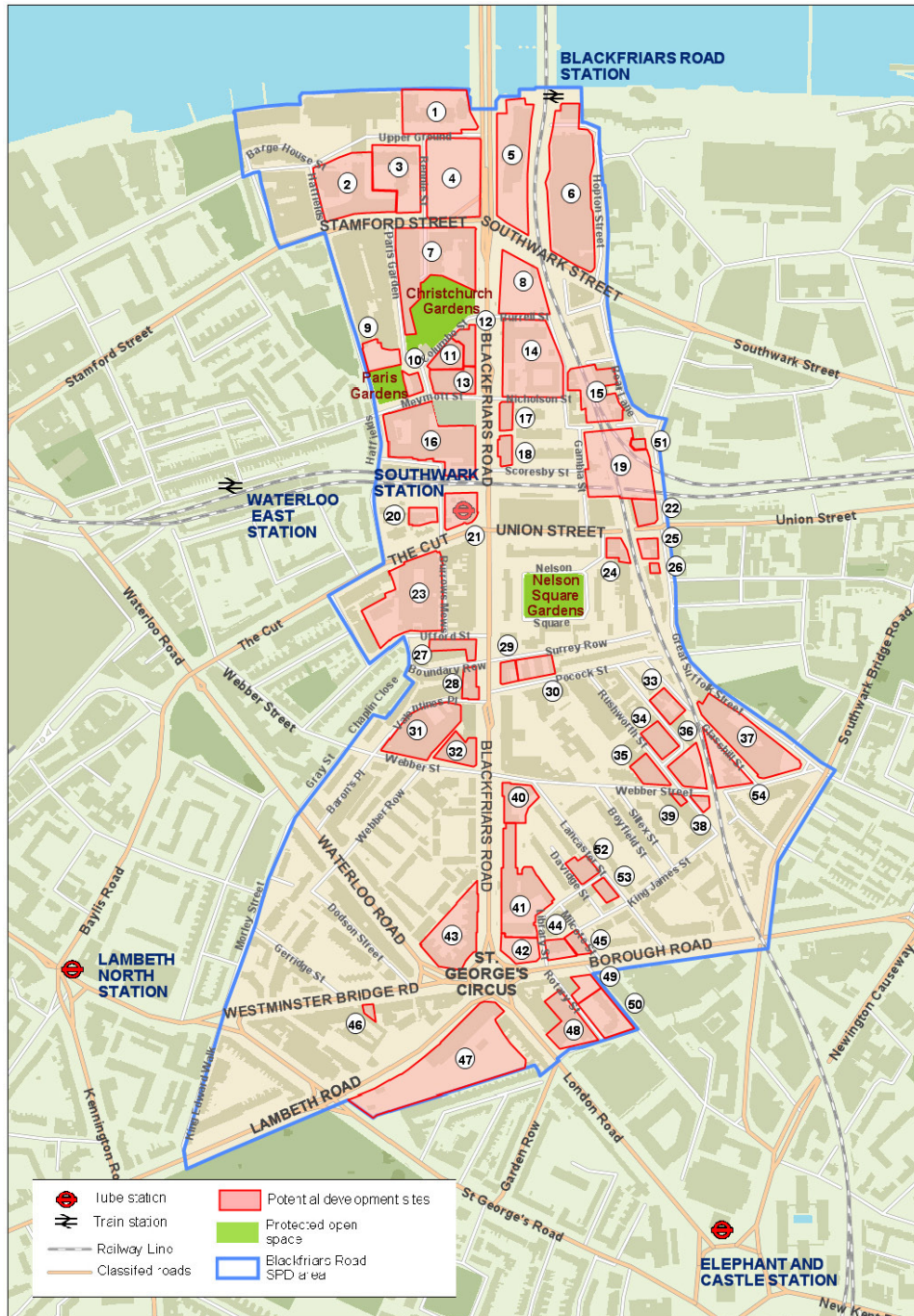
Locations with capacity to support tall buildings

- 6.3.9 We have identified four indicative locations where intense development in the form of taller buildings may be suitable within the Blackfriars Road area.
- 6.3.10 Firstly, the northern section of Blackfriars Road has a larger grain character, and acts as a gateway to the riverfront and City of London beyond. Its location and improved transport links including the increased capacity at Blackfriars Road station offers huge opportunities for development and further definition to the emerging tall building cluster that includes a number of tall buildings that already have consent.
- 6.3.11 Secondly, the central section of Blackfriars Road is currently marked by the Palestra building at the junction/node of Blackfriars Road, The Cut and Union Street. There is an opportunity for a tall building above the Southwark tube station to add townscape definition as a landmark. We would not expect any further tall elements to be proposed at this location
- 5.3.5 Thirdly, the southern stretch of Blackfriars Road between the Southwark tube station and St George's Circus also has the opportunity for taller buildings that are of an appropriate scale, and not out of context with its boulevard character and position within the townscape.
- 5.3.6 Lastly, the southern end of Blackfriars Road close to or on St George's Circus also has the potential for a taller element that acts as a landmark and focal point for the junction, but one which should be set back from the perimeter of the Circus. Any taller element should not compete in height with the emerging gateway cluster at the northern end of Blackfriars Road and at the town centre cluster at Elephant and Castle, as this location is not of similar importance to these locations.
- 6.3.12 We have also identified a number of potential development sites as part of this process that illustrate the potential for change within the area. The majority are located on or around Blackfriars Road, while some are located within the east of the SPD area.
- 6.3.13 A number of these sites offer the potential for more intense development due to the size of the site, its location within the area, or that it is currently not being efficiently used. These larger sites also offer potential for public realm improvements including the creation of new links to enhance permeability and the creation of new public space.

6.3.14 In locations which are located away from Blackfriars Road or other main routes in a context which is more suited to less intense development, a tall building may not be appropriate. These include the development sites located to the east of the SPD area around Great Suffolk Street and Webber Street.

6.3.15 Figure 6 and Table 1 in the SPD illustrate the locations of potential development sites in the Blackfriars Road area.

SPD Figure 6. Potential development sites



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Table 1: Potential development sites

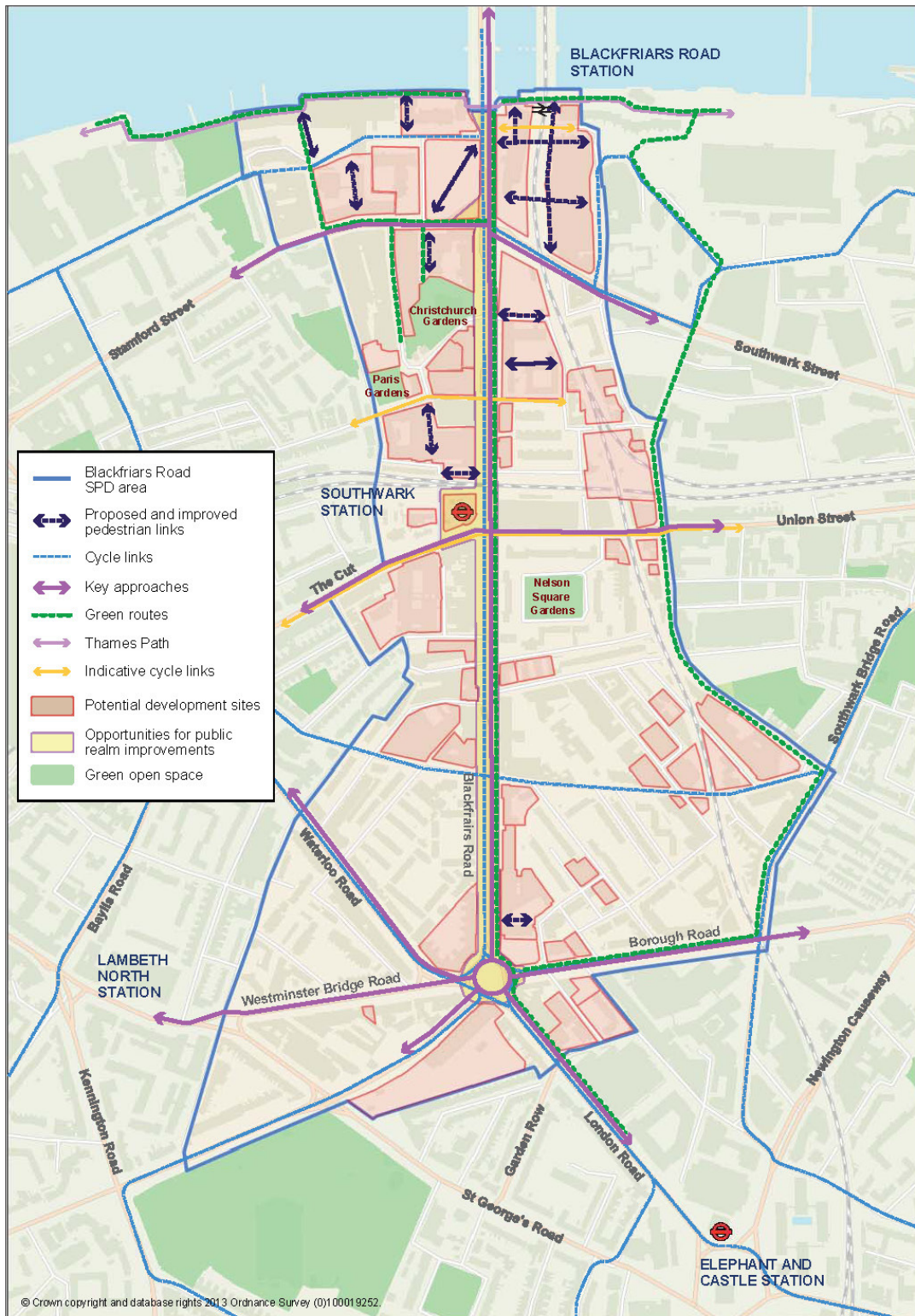
ID	Name
1	River Court and Doggetts Coat and Badge Public House
2	South Bank Tower
3	Rennie Court
4	1 Blackfriars Road
5	Ludgate House
6	Sampson House, 64 Hopton Street
7	20 Blackfriars Road, Stamford Street, Paris Gardens
8	231-241 Blackfriars Road
9	6 Paris Gardens / 21-22 Hatfields
10	45 Colombo Street
11	34 - 68 Colombo Street
12	Wedge House, 32-40 Blackfriars Road
13	Friars Bridge Court, 41-45 Blackfriars Road
14	Conoco House, Quadrant House, Edward Edward's House and Suthring House
15	Site bounded by Bear Lane, Dolben Street, Chancel Street and Treveris Street
16	Telephone exchange and 50-60 Blackfriars Road
17	209-215 Blackfriars Road
18	202-208 Blackfriars Road
19	Site bounded by Gambia Street, Dolben Street and Great Suffolk Street
20	1 Joan Street
21	Southwark Tube Station, 68-71 Blackfriars Road
22	200 Union Street
23	Southwark College, The Cut
24	235-241 Union Street
25	225 Union Street
26	54-58 Great Suffolk Street
27	90-92 Blackfriars Road
28	Friden House, 96-101 Blackfriars Road
29	St Georges Mansions Blackfriars Road
30	UDP Site 8P, Manna Ash House, Pocock Street Garages
31	21-31 Webber Street and 3-7 & 19-21 Valentines Place
32	109-115 Blackfriars Road
33	38-40 Glasshill Street
34	33-38 Rushworth Street
35	61 Webber Street
36	63 Webber Street
37	108 to 114 Great Suffolk Street
38	96 Webber Street
39	94 Webber Street
40	Tadworth House and Georges health centre, 151-153 Blackfriars Road
41	Erlang and Hill House
42	Erlang House car park
43	McLaren House, 1 St. Georges Circus
44	Passmore Edwards Library, 112 Borough Road
45	Caxton House
46	35 Westminster Bridge Road
47	TfL Bakerloo Sidings and 7 St George's Circus
48	Site bounded by Rotary Street. Thomas Doyle Street and London Road
49	109 - 112 Chapel Road

50	Hugh Astor Court, Thomas Doyle Street
51	28-30 Great Suffolk Street
52	44-50 Lancaster Street
53	52-56 Lancaster Street
54	65 Glasshill Street

Opportunity for new links and public realm

- 6.3.16 Presently, the quality of the public realm in the Blackfriars Road area varies. Some streets and spaces suffer from neglect and are under-used, while others carry significant numbers of pedestrians and cyclists during rush hour periods, especially on pedestrian commuter routes such as Blackfriars Road and Union Street. Sections of Blackfriars Road and the surrounding roads and spaces have inactive ground-floor frontages that result in environments that people do not engage with.
- 6.3.17 There are opportunities to improve the quality and provision of public realm will make streets and spaces more enjoyable and better used. Examples of where this has already been achieved are streetscape improvements in Gambia Street and The Cut. The Characterisation Study identifies that there are a number of areas that have the potential for improvements and creation of new links and public spaces. The Study also proposes a set of management principles for the public realm.
- 6.3.18 The large potential development sites along Blackfriars Road, especially on the northern section, provide poor frontages to the street due to existing buildings being large impermeable blocks. Development of these sites offers the potential to create new links to enhance permeability through the area for pedestrians and cyclists as well as provide more opportunities to improve the existing public realm and encourage activity in these new spaces. Sites which offer the opportunity to create new meaningful public space provide additional potential as locations suitable for a tall building. The creation of a new public space can provide a sufficiently sized space which can ensure that a proposal for a tall building can develop a considered relationship with any adjoining existing or proposed development as well as providing space at ground level to ensure that entrance and access are well considered. The amount of new public space created on a site can also be maximised by a more efficient use of land, and tall element may offer the opportunity for a larger public space where a lower height building may take up more space on the site.
- 6.3.19 There are also opportunities for new and enhanced north/south links and spaces that encourage movement to and from the Thames Path into the Blackfriars Road area.
- 6.3.20 Public realm improvements and development surrounding St George's Circus have the opportunity to enhance its historic setting and reinforce its geometry through new activity and landscaping.

SPD Figure 4. Opportunity for new links and public realm



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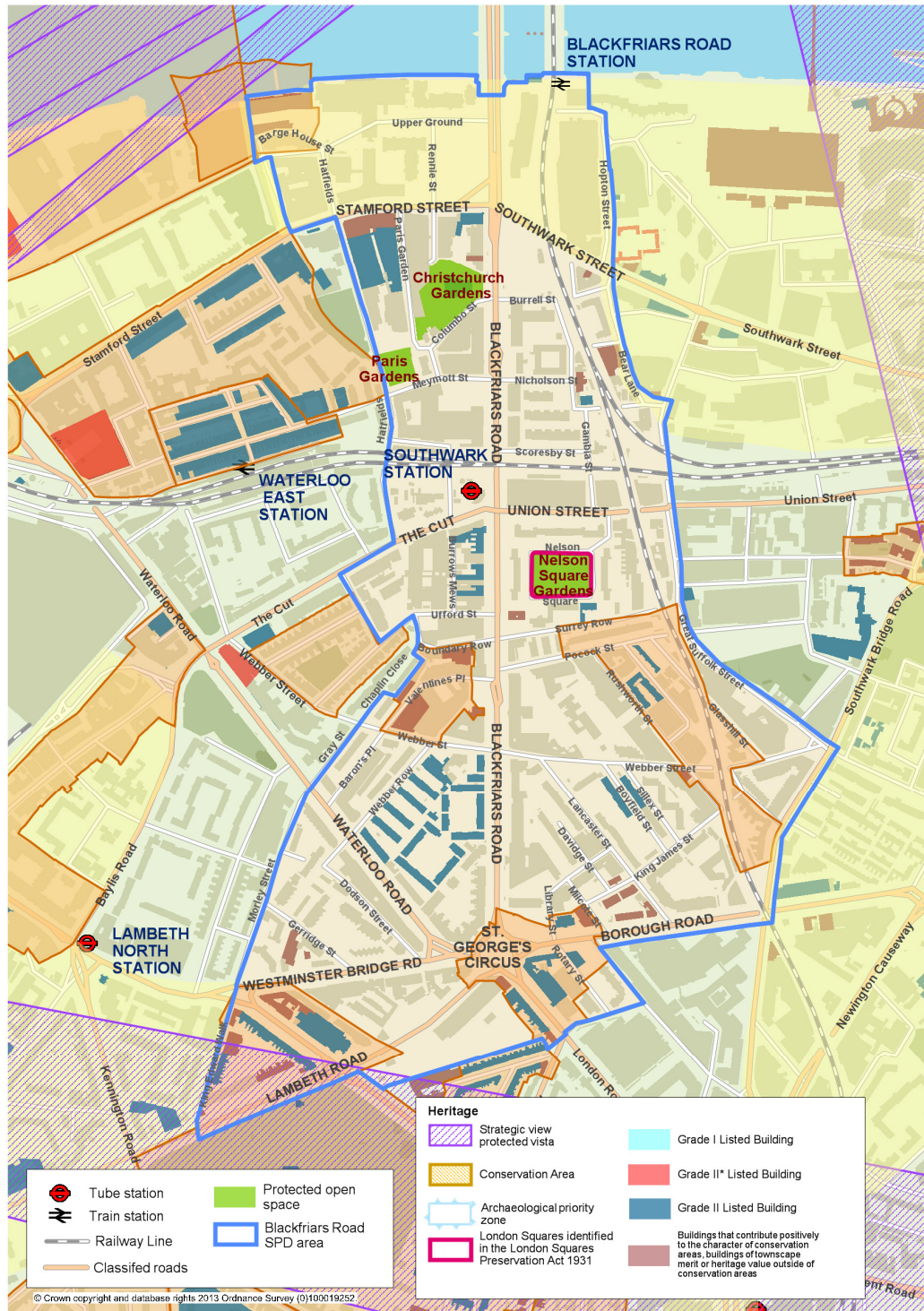
Contextual building heights

- 6.3.21 The building heights in the majority of the Blackfriars Road area are generally up to 25m in height. Building heights increase along Blackfriars Road and main routes within the area such as Union Street and Southwark Street. The northern section on and around Blackfriars Road and Bankside currently have the tallest existing and consented buildings. Appendix 1 sets out more information on the building height context.
- 6.3.22 A number of potential development sites have existing buildings which are tall in scale but which do not currently contribute positively to the local character of the area, due to the scale, massing and design of the building as well as lack of usable public realm or poor relationship to the street at ground level. These examples include the Erlang House and Colombo House on Blackfriars Road, and Sampson and Ludgate House, which vary in height from 30 to 50m.
- 6.3.23 This analysis of the existing and consented context of heights establishes a range of heights which exist in and around the area and informs the identification of the strategic building height options.

Conservation areas and their settings

- 6.3.24 There are five conservation areas located within the SPD area. Blackfriars Road North takes in part of the Old Barge House Street conservation area. Blackfriars Road South encompasses the entire Valentine Place and King's Bench conservation areas and parts of the St George's Circus and West Square conservation areas. Three conservation areas abut the western boundary of the SPD area in Lambeth: South Bank, Waterloo and Roupell Street conservation areas.
- 6.3.25 Appraisals or draft appraisals have been prepared for these conservation areas which provide more detail on the setting and significance of the asset, highlighting the historic stages of commercial and retail growth, and sets out how change in the conservation areas and their settings can be managed.
- 6.3.26 There are also a number of tall buildings and features located within the conservation areas or their setting, where the character and design of some of these buildings may not be positively contribute to the character of the conservation areas. The potential for any new tall buildings would have to be balanced with any potential impacts on the appreciation of the significance of the conservation area and its setting.
- 6.3.27 Our understanding of the character and significance of the conservation areas has been used to inform the further stages of the building height and tall building analysis.
- 6.3.28 Figure 5 identifies heritage assets within the area including conservation areas.

SPD Figure 5. Heritage



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Listed buildings and structures and their settings

6.3.29 There are a number of prominent listed buildings located within the SPD area. The majority are grade II listed, while the grade II* listed Obelisk within the centre of St. George's Circus is a landmark heritage feature for the area. The grade II* Hoptons almshouses on Hopton Street are located on the boundary of the SPD area. Landmark grade II listed buildings which have helped define the character of the area include:

- 1 – 3 Paris Gardens
- 15 – 17 Paris Gardens
- 1 – 2 Stamford Street
- Christ Church
- 74-78 and 81-83 Blackfriars Road
- The Blackfriars Settlement
- The Drapers Almshouses, Glasshill Street
- Merrow House and Rushworth Street estate
- Peabody Estate, Blackfriars Road
- St George the Martyr Library
- St George Roman catholic church
- Sons of Temperance building

A full schedule is set out in the Bankside, Borough and London Bridge and Elephant and Castle Characterisation Studies, and greater detail is detailed in relevant conservation areas appraisals and the respective statutory listings for the buildings and structures.

6.3.30 Due to the history of development in the SPD area, the setting of many of these listed buildings has already been affected by adjoining development or the current use of the site or building which may vary from its original function.

6.3.31 A tall building would be sensitive when located in views from the setting of a listed building. Our understanding of the setting of listed buildings has been used to inform the further stages of the building height and tall building analysis.

6.3.32 Figure 5 shows the listed buildings and structures.

Buildings and structures that contribute positively to the character of conservation areas, or townscape merit or heritage value outside conservation areas.

6.3.33 Buildings and structures that contribute positively to the character of conservation areas, or townscape merit or heritage value outside conservation areas, have been identified as part of the characterisation study with a full list of these building set out within the study. The council are currently preparing a borough wide schedule and will be consulting on this in 2014. Following consultation the schedule will be adopted and set out the definitive schedule of buildings in the borough. The schedule will update any which are identified in the Borough, Bankside, and London Bridge and Elephant and Castle characterisation studies.

6.3.34 In accordance with paragraph 169 of the NPPF, which encourages local authorities to identify buildings with local value, and criteria set out in English

Heritage best practice guidance, we have identified buildings which make a positive contribution to the character or appearance of the area due to their architectural or historic interest, or because they form part of an interesting group.

6.3.35 The broad criteria for inclusion are as follows:

- Age and Rarity
- Aesthetic Value and Landmark Status
- Group Value
- Historic, evidential, communal and social value
- Archaeological interest
- Associations with designed landscapes.

6.3.36 Due to the history of development in the core area, the setting of many of the buildings and structures identified have been affected by adjoining development or the current use of the site or building which may vary from its original function.

6.3.37 A tall building would be sensitive when located in views from the setting of a building or structure identified. Our understanding of the setting of these buildings identified and structures identified has been used to inform the further stages of the building height and tall building analysis.

6.3.38 Figure 5 shows the buildings and structures identified.

Archaeology and Archaeological Priority Zones

6.3.39 The Borough, Bermondsey and Rivers Archeological Priority Zone covers an area in the north of the SPD area, between the River Thames, Stamford Street, Southwark Street and Bear Lane.

6.3.40 There are no scheduled monuments within the core area.

6.3.41 Any future development proposal, particularly those for a tall building, will need to consider further investigation when any application comes forward.

6.3.42 Figure54 shows the extent of the APZ in the SPD area.

Open spaces

6.3.43 There is a limited provision of open space within the SPD area, with only three protected open spaces located on or close to Blackfriars Road. These are:

- Christ Church Gardens
- Paris Gardens
- Nelson Square Gardens

6.3.44 There no registered parks or gardens within the SPD area, although Nelson Square Gardens is identified in the London Squares Preservation Act 1931.

6.3.45 These open spaces would be sensitive to tall building development, particularly when tall buildings are located adjacent to the open space. Tall buildings may be seen over the roofline of buildings fronting an open space, but the potential impact on the setting of the space would need to be assessed.

6.4 Identifying locations where we would test strategic tall building height options

6.4.1 The adopted and emerging vision, urban design strategy, opportunities and constraints have informed the identification of locations which we would identify as potential locations to test options of tall buildings. This analysis has also set out where we would not test options of tall buildings and also highlighted the main sensitivities in the area:

6.4.2 **We would not test tall buildings** in locations or on sites which have limited capacity for intense development, do not create a focal point at the junction of main routes, a gateway opportunity or marking a main destination into the Blackfriars Road, are in areas with limited access to public transport, with limited or no opportunity for public realm improvements or the creation of new meaningful public space and locations where the character and context would not support the potential for tall development.

6.4.3 This includes the smaller potential development sites which are located on the away from Blackfriars Road, within an area of a predominantly lower scale, especially sites to the east of SPD area.

6.4.4 **We would test for tall buildings** in locations or on sites which have sufficient capacity for intense development, create focal points at the junctions of main routes, have gateway opportunities or mark main destination into or on Blackfriars Road, are in areas in close proximity to a main transport hub or with high PTAL ratings, with opportunity for public realm improvements or the creation of new meaningful public space.

6.4.5 We have identified the following potential development sites within four indicative areas on Blackfriars Road for testing:

- **Blackfriars Road northern section**, on sites Sampson and Ludgate House, Colombo House, 202 – 208 Blackfriars Road and 209 – 215 Blackfriars Road.
- **Blackfriars Road central node**, above Southwark Tube Station.
- **Blackfriars Road southern section**, St. George's Mansions, 90-92 Blackfriars Road, 96-101 Blackfriars Road, Friars House, 109-115 Blackfriars Road, 151-153 Blackfriars Road, Hill House
- **St George's Circus / Southern end of Blackfriars Road**, sites on or adjacent to the Circus: Erlang House and car park, and McLaren House.

6.4.6 There are also likely to be sensitivities which will impact on the potential location and design of tall buildings at these sites. These sensitivities include the scale of the development surrounding the site, nearby heritage assets and important views to or across the site.

- 6.4.7 **Tall buildings would be sensitive** in locations where they would impact on the amenity of existing development, open and public spaces, in the setting of heritage assets or when viewed from the setting of a heritage asset.
- 6.4.8 Tall buildings would be sensitive when located in the following areas:
- Adjacent to lower height development.
 - Within the setting and views of Old Barge House Street, Valentine Place and King's Bench, St George's Circus and West Square conservation areas within Southwark and the three adjoining conservation areas in Lambeth: South Bank, Waterloo and Roupell Street conservation areas.
 - Setting and views of heritage assets such including listed buildings and structures
 - Setting and views from open spaces.
 - Setting and views of buildings of buildings and structures that contribute positively to the character of conservation areas, or townscape merit or heritage value outside conservation areas.
 - Setting and views of spaces of local importance.
 - Close to the River Thames
- 6.4.9 This analysis has informed the approach to identifying strategic building height options and how will we test these options and assess the potential impacts of new development. In preparing planning applications, developers will also need to undertake further detailed testing.

6.5 Identifying strategic building height options

- 6.5.1 We have identified a number of strategic options for building heights in the opportunity area, including tall buildings. These testing options have been identified through our evaluation of:
- Context for tall building heights
 - Relationship to low scale surrounds and sensitivities of heritage assets and their settings.
 - Gateway opportunities into the Blackfriars Road area
 - Proximity to transport hubs / PTAL ratings
 - Urban design framework for the Blackfriars Road SPD area
 - Opportunity sites which have the capacity to support intense development, as well as new public space
 - Locations which we have identified and can test the potential for tall buildings as established in policies and guidance, particularly saved Southwark Plan Policy 3.20.

Context for building heights

- 6.5.2 The Core Strategy defines a tall building as being over 30m or of a height that would be tall than the surrounds. In the Blackfriars Road area the contextual heights vary with some taller buildings primarily focused on the main routes and nodes within the area.
- 6.5.3 In the Blackfriars Road area we can identify a range of heights that would establish the tall building context for our analysis.
- 6.5.4 The context for tall buildings is set out in appendix 1 of this study, and establishes the following range of building heights in the area:

Height (in storeys)	Context
Up to 25m AOD	<ul style="list-style-type: none"> • General height of development • Areas predominantly residential generally are of heights of 2 to 5 storeys
25 to 50m AOD	<ul style="list-style-type: none"> • Mid to tall development height • Buildings such as Erlang House, Friars House, Colombo House, Quadrant House
50m to 70m AOD	<ul style="list-style-type: none"> • Tall buildings which are visible from the local and wider area • Buildings such as Palestra, Sampson House, Sea containers House
70m to 100m AOD	<ul style="list-style-type: none"> • Taller Buildings such as 240 Blackfriars Road
100m+ AOD	<ul style="list-style-type: none"> • The tallest buildings in the SPD area such as Kings Reach/South Bank tower and schemes that are consented including 1 Blackfriars Road, 20 Blackfriars Road and South Bank Tower extension and Sampson and Ludgate.

Testing for tall buildings

- 6.5.5 Our adopted Core Strategy vision and the emerging vision for Blackfriars Road has identified the potential that new landmark buildings of exceptionally high design quality can contribute positively to the streetscape and highlight importance of Blackfriars Road as a location for change.
- 6.5.6 Therefore in our analysis of identifying strategic building options we have identified testing heights that range from heights that reference existing or consented building heights, to heights that are taller than the existing context in order to understand how taller buildings could contribute to achieving the objectives of our vision. We will also test tall heights to understand the potential impact of these heights on the local context and historic environment.

Identifying heights for testing

- 6.5.7 We have identified the following four options which take account of the context for building heights, the adopted and emerging vision for the Blackfriars Road area, the policy context and the potential for heights we have identified for a range of height options for testing.
- 6.5.8 A number of sites have existing buildings on the sites which establish a base height context for testing such as the Palestra at 56m, and also consented schemes such as 1 Blackfriars Road at 165m and 20 Blackfriars Road (148m and 105m)
- 6.5.9 There are also a number of surrounding tall buildings and features which have informed the identification of height for testing. A study of the existing context of heights in the SPD area is set out in appendix 1.
- 6.5.10 The testing options are set out in the table below and are indicatively illustrated in the testing options figure below and also appendix 3

Existing height context	Baseline for testing <ul style="list-style-type: none"> The existing context of existing building heights Heights of consented schemes, such as 1 Blackfriars Road at 165m and 20 Blackfriars Road (148m and 105m)
Testing height option 1	<ul style="list-style-type: none"> The existing context of existing building heights Heights of consented schemes, such as 1 Blackfriars Road at 165m and 20 Blackfriars Road (148m and 105m) PLUS <ul style="list-style-type: none"> 35m around central node above Southwark tube station and 202 – 215 Blackfriars Road.
Testing height option 2	<ul style="list-style-type: none"> The existing context of existing building heights Heights of consented schemes, such as 1 Blackfriars Road at 165m and 20 Blackfriars Road (148m and 105m) PLUS <ul style="list-style-type: none"> Up to 85m at Sampson and Ludgate in the northern section of Blackfriars Road 56m around central node above Southwark tube station and 45m at 202 – 215 Blackfriars Road 30m along the southern section of Blackfriars Road (Same height as Palestra shoulder) 56m at Erlang House 20m at Erlang House car park and McLaren House fronting St George’s Circus
Testing height option 3	<ul style="list-style-type: none"> The existing context of existing building heights Heights of consented schemes, such as 1 Blackfriars Road at 165m and 20 Blackfriars Road (148m and 105m) PLUS <ul style="list-style-type: none"> Up to 100m at Sampson and Ludgate in the northern section of Blackfriars Road 70m around central node above Southwark tube station and 45m at 202 – 215 Blackfriars Road

	<ul style="list-style-type: none"> • 30m along the southern section of Blackfriars Road (Same height as Palestra shoulder) • 70m at Erlang House • 20m at Erlang House car park and McLaren House fronting St George's Circus
Testing height option 4	<ul style="list-style-type: none"> • The existing context of existing building heights • Heights of consented schemes, such as 1 Blackfriars Road at 165m and 20 Blackfriars Road (148m and 105m) <p>PLUS</p> <ul style="list-style-type: none"> • Up to 100m at Sampson and Ludgate in the northern section of Blackfriars Road • 70m around central node above Southwark tube station and 45m at 202 – 215 Blackfriars Road • 56m along the southern section of Blackfriars Road (Same height as Palestra) • 100m at Erlang House • 20m at Erlang House car park and McLaren House fronting St George's Circus



6.6 Testing and evaluating strategic building height options

6.6.1 Having identified the locations where we would test options for tall heights and with consideration of the testing height options we have identified a range of options for each of the areas identified for testing.

6.6.2 The urban design analysis has also identified that there is a different context and character within the Blackfriars Road area, especially between the northern and southern ends of Blackfriars Road, as well as the different type of opportunities which tall buildings can bring. Site analysis and urban design considerations are applied to understand how the massing of buildings and height on the identified areas will be considered.

6.6.3 The following heights and urban design consideration have informed the options for testing on each site:

Opportunity Site	Height options	Urban design considerations
Blackfriars Road northern section	Testing height of a tall element up to 100m Consented heights	<ul style="list-style-type: none"> • Relationship to consented schemes, emerging cluster and surrounding context • Relationship to the riverfront • Strategic and local views • Contribution as a focal point/gateway location • Potential new town centre uses with active frontages • Potential for new links and public space • Improved public realm opportunities and landscaping • Impact on significance of heritage assets, including the setting and views of listed buildings, conservation areas and positive contributors. • Impact on open spaces • Height/Width ration between building heights and the width of Blackfriars Road. • Enhance boulevard character and building lines • Loss of amenity and environmental impacts such as overshadowing
Blackfriars Road central node at junction of Blackfriars Road, The Cut and Union Street	Testing height of a tall element up to 70m	<ul style="list-style-type: none"> • Relationship to surrounding context including Palestra and nearby low-rise residential areas. • Contribution as a focal point/landmark for the node • Potential new town centre uses with active frontages • Potential for new links and public space • Improved public realm opportunities and landscaping

Opportunity Site	Height options	Urban design considerations
		<ul style="list-style-type: none"> • Impact on significance of heritage assets including the setting and views of listed buildings, conservation areas and positive contributors. • Enhance boulevard character and building lines • Loss of amenity and environmental impacts such as overshadowing
Blackfriars Road southern section	Testing height of a tall element up to 56m	<ul style="list-style-type: none"> • Relationship to surrounding context including nearby low-rise areas. • Potential new town centre uses along Blackfriars Road with active frontages • Height/Width ration between building heights and the width of Blackfriars Road. • Potential for new links and public space • Improved public realm opportunities and landscaping • Impact on significance of heritage assets, including the setting and views of listed buildings, conservation areas and positive contributors. • Loss of amenity and environmental impacts such as overshadowing
St George's Circus / Southern end of Blackfriars Road	Testing height of a tall element up to 100m	<ul style="list-style-type: none"> • Relationship to surrounding context including nearby low-rise areas. • Contribution as a focal point/landmark for the node • Potential new town centre uses with active frontages • Potential for new links and public space • Improved public realm opportunities and landscaping on the Circus • Height/Width ration between building heights and the width of Blackfriars Road. • Impact on significance of heritage assets, including the setting and views of listed buildings, conservation areas and positive contributors. • Geometry of the Circus • Loss of amenity and environmental impacts such as overshadowing

6.6.4 There are a number of ways in which we can test and evaluate the options.

These include:

- Testing massing and capacity of different options
- Evaluating the impact of options in testing views

Testing massing and capacity of different options

- 6.6.5 From our urban design analysis and identification of testing heights as well as the urban design considerations and sensitivities set out in the table above we have tested massing and capacity on each of the identified areas. The testing of massing has taken the strategic options and looked at how these can be applied on each area.
- 6.6.6 In setting out massing options for testing, when testing heights up to 100m on larger sites we have applied a range of heights across a site as informed by the urban design considerations identified. We carried this out on Sampson and Ludgate site and Erlang House site. We have applied this methodology to these sites, as the vision and urban design strategy has identified that these sites have the potential for new links to break up the large site and the opportunity to create new public space. Therefore a taller element can contribute by providing a new landmark at focal points and ensure that the development optimises the potential area available for public space as well as ensure sufficient distance between a tall element and the surrounding lower height development on a site.
- 6.6.7 Where we are testing tall heights on a node at Southwark Tube station or at smaller sites along Blackfriars Road, we have tested only a single tall element on the site rather than a number of tall elements.

Identifying testing views

- 6.6.8 We have identified a number of views of the local and wider area which will allow us to understand the potential impact of tall building development on local character and historic context. These included protected views that form part of the London View Management Framework such as the views of the Palace of Westminster, from St James Park and river prospect views from up and downstream of Blackfriars Bridge.
- 6.6.9 We are not looking to protect the identified local views through the work of this study. We have used these views to understand the local character and historic context of the area and to assess the impacts on areas that are sensitive to new tall building development.
- 6.6.10 We have identified views that are commonly experienced by residents and users in the local area, such as main routes into the area and also areas which are sensitive to new development such as the setting of heritage assets including the World Heritage Sites, conservation areas, listed buildings and also historic and protected open spaces.
- 6.6.11 The types of views identified include:
- Historic axial views in the area
 - Views along main axis or key approaches into the opportunity area
 - Views of or from conservation areas or their settings
 - Views of or from the setting of a listed building
 - Views of buildings of local importance
 - Views of or from public or open spaces
 - Other key views from the wider area where we can test tall building development when seen from a wider context

6.6.12 A list of views tested is set out in appendix 2

Views assessment and testing

Assessing views

6.6.13 We have produced an assessment of each of the testing views. This assessment has been informed by English Heritage guidance *Seeing The History In The View*. We are not seeking to use the identification of views or this assessment to identify important local views for protection. We will use this assessment to understand the potential impact of development when seen in these views in order to inform the production of our building height policy and guidance.

6.6.14 We have assessed each of the testing views to understand:

- What is important in the view or why is the view of importance.
- What type of view is it and what is visible in the view.
- How have consented schemes changed or likely to change the view.
- What is the potential impact of new development in the view

6.6.15 Appendix 3 sets out an assessment of the testing views. This assessment has provided detailed analysis for a number of the main views in the area which provide a better understanding of the potential impact for development. Others views which were considered as part of this study are listed for information.

Evaluating impact

6.6.16 Having identified our strategic building height options and prepared massing studies for each site we then are able to test each of these options in the testing views.

6.6.17 Informed by the view assessment which has allowed us to understand what is important in a view, we can assess the potential impact of the building heights in each of the testing options when they appear in a view.

6.6.18 Our assessment of the potential impact of these options has been informed by guidance such as *Seeing The History In The View* and *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*, which set out an approach to determine the significance of heritage assets as well as assessing the magnitude of potential impact.

6.6.19 We have also considered the potential impacts set out in the *Environmental Impact Assessment Regulations 2011* though any detailed EIA screening and assessment would be carried as required during a planning application process for development on a particular site.

6.6.20 As the testing views include both general views of the local area, as well as views of a range of heritage assets, our assessment therefore takes into account the differing levels of significance of the important aspects of the view when considering potential impact, whether it be to character and context of an area, the setting of a heritage asset or setting of an open space.

6.6.21 For each of the testing views we tested each of the strategic options to understand the potential impact, whether adverse or beneficial:

- **Individual and cumulative impact** - The impact of the massing of the option as individual elements as well as the cumulative impact of the massing when seen as a group. This impact also needs to be considered in the context of existing massing and tall buildings and consented tall buildings.
- **Negligible or no impact** - Where building heights or tall buildings in the testing option will have no impact or negligible impact when seen in the view, eg: the mass of the development is not visible in the view or a slight change is visible but is hardly affected by development.
- **Minor impact** - Where building heights or tall buildings in the testing option are visible in the view and may noticeably change the context or setting of assets in the view.
- **Moderate impact** - Where building heights or tall buildings in the testing option are visible in the view and may significantly change the context or setting of assets in the view.
- **Major impact** - Where building heights or tall buildings in the testing option are visible in the view and may significantly change the appreciation of the Outstanding Universal Value of a World Heritage Site.

6.6.22 In considering whether the heights tested have either beneficial or adverse impacts when seen in the views we have made the following judgements:

- **Beneficial impact** – The massing tested in the option contributes to the strategic vision for the area and enhances or reinforces existing streetscape and townscape qualities.
- **Adverse impacts**- The massing tested in the option detracts or erodes the existing streetscape and townscape qualities, particularly the setting of heritage assets or open spaces

6.6.23 More detail on the assessment of the potential impact of these options is set out in appendix 2.

6.7 Evaluation of strategic building height options

6.7.1 Our analysis of the testing has produced the following guidance for the Blackfriars Road SPD area:

General Principles

6.7.2 Generally development should be of an appropriate scale of height that contributes positively to create a distinctive identity for Blackfriars Road by encouraging tall buildings at the key gateways and nodes. Development should reinforce the civic character of Blackfriars Road, Stamford Street, Southwark Street and the riverfront. Generally the heights will be taller along the main routes, with appropriate heights of up to 30 metres, depending on the local context. Heights off of the main routes will generally be lower.

6.7.3 Tall buildings (above 30 metres in height or 25 metres in Thames Policy area) will be encouraged in important locations, where they reinforce the character and function of this main route into central London. These landmarks will highlight the importance of Blackfriars Road as a gateway to Southwark and

create new focal points at main transport nodes and the junction between Blackfriars Road and Elephant and Castle. This principle underpins the building heights guidance in SPD 5.

- 6.7.4 Where larger sites offer the potential for new development through the demolition of existing buildings, or empty sites with the potential for new development along street frontages or potentially large blocks, new development of continuous height and appearance will have an adverse impact. The design of long or large blocks of buildings will need to consider humanising the scale of development by breaking up long facades or continuous height of roofline through shifts in the design of blocks including considering the height of the roofline, break in façade, use of materials and setbacks.

Northern section of Blackfriars Road

- 6.7.5 The junction of Blackfriars Road, Stamford Street and Southwark Street should be the focus of the tallest heights at the northern end of Blackfriars Road, where there are consented schemes up to 165m. With this in mind, new tall buildings should consider the cumulative impact and relationship as well as the relationship with Blackfriars Road. Building heights should be lower towards and be set back from the river front. Building heights should step down from the cluster to adjoining lower areas to the east, west and south, and be designed so that the rear of taller buildings considers this context. New additions to the emerging cluster could reaffirm the location as a gateway and destination of activity, while allowing an efficient use of land which can enhance the potential for the creation of new public space.
- 6.7.6 Tall buildings in this location could also potentially have a minor to moderate adverse impact in views and new development on the site will need to consider:
- The potential impact on the significance of heritage assets and their settings within the local context including the Old Barge House Street, Waterloo, and Roupell Street conservation areas. Proposals should aim to better reveal the significance or enhance the setting of heritage assets.
 - Consider the London View Management Framework and the potential impact on any strategic and also local views.
 - Demonstrate an exemplary standard of design.
 - Potential provision of new routes and creation of new public spaces to break up larger sites.
 - The design of massing along main street frontages and along any new routes proposed on the site.
 - The design of any tall building, in particular the upper floors where these appear above the roofline of existing buildings in local, wider and strategic views.
 - Loss of amenity and environmental impacts such as overshadowing
- 6.7.7 As the height of the building increased the potential impact is also increased, with a tall building likely to be seen from a wider area. Therefore a tall building while also having beneficial impacts will have moderate adverse impacts on the setting of nearby conservation areas and can appear out of scale with the surrounding heights and prominent on the skyline in local and wider views.

Central node at the junction of Blackfriars Road, The Cut and Union Street.

- 6.7.8 There is an opportunity for a single tall building up to 70m above Southwark Tube station that could act as a focal point for this important node/junction. A tall building would have a minor beneficial impact on immediate views of the site, particularly from the Cut and Union Street. A tall building of this height could also provide beneficial impacts by allowing an efficient use of land which can enhance the potential for the creation of new public space and improved public realm.
- 6.7.9 A tall element up to 70m storeys high could also have an adverse impact and new development on the site will need to consider:
- The potential impact on the significance of heritage assets and their settings within the local context particularly on Blackfriars Road and nearby conservation areas such as Valentine Place and Kings Bench conservation areas.
 - Potential impact on amenity of lower scale adjacent residential development to the west of the site.
 - Setback of buildings along street frontages, particularly to The Cut and Blackfriars Road frontages.
 - Potential provision of new routes and creation of new public spaces to break up the site.
 - The design and scale of massing along main street frontages and along any new routes proposed on the site.
 - The design of a tall element up to 70m, in particular the upper floors where these appear above the roofline of existing buildings in local and wider views.
 - Loss of amenity and environmental impacts such as overshadowing
- 6.7.10 As the height of the building increased the potential impact is also increased, with a tall height building likely to be seen from a wider area. Therefore a tall building over 30m while also having beneficial impacts will have moderate adverse impacts and can appear prominent over the lower scale of development and prominent on the skyline in local and wider views.
- 6.7.11 It is considered that heights above 70m could be overbearing within the local context. Excessive height at this location could have an adverse impact on overall strategy for building heights within the north of the borough, as it is evident that this location is not of the order of the emerging gateway cluster at the north of Blackfriars Road or the town centre at Elephant and Castle, where the tallest buildings are appropriate. A 70m threshold is considered appropriate for this midpoint between the two.

Southern section of Blackfriars Road between the junction of Blackfriars Road, The Cut and Union Street, and St George's Circus

- 6.7.12 There are opportunities for tall buildings along both sides of the southern section of Blackfriars Road up to 30m. Tall buildings of this height would have a minor impact on immediate views along and to Blackfriars Road, as there is an existing context for this height threshold. Tall buildings at this height could provide beneficial impacts by maintaining and enhancing the boulevard character of the road, and allowing an efficient use of land which could enhance the potential for the creation of new public space and improved public realm

- 6.7.13 Tall buildings along Blackfriars Road up to 30m storeys high could also have an adverse impact and new development on the site will need to consider:
- The potential impact on the significance of heritage assets and their settings within the local context, particularly on Blackfriars Road and nearby conservation areas such as Valentine Place, Kings Bench and St George's Circus conservation areas.
 - Potential impact on amenity of lower scale development to the east and west of the road.
 - Boulevard character, building lines and activate street frontages
 - Potential provision of new routes and creation of new public spaces to break up the larger sites.
 - The design of massing along main street frontages and along any new routes proposed on the site.
 - The design of a tall element up to 30m, in particular the upper floors where these appear above the roofline of existing buildings in local and wider views.
 - Loss of amenity and environmental impacts such as overshadowing
- 6.7.14 As the height of the testing increased the potential impact also increased, with a taller height building likely to be seen from a wider area. A series of tall buildings over 30m along Blackfriars Road – for example at a height of 56m which is the height of the Palestra - could adversely impact residential and public realm amenity along and parallel to the road, as the ratio of building height and the width of the street could result in adverse environmental impacts such as overshadowing.

St George's Circus / Southern end of Blackfriars Road

- 6.7.15 There is an opportunity for a tall building at the southern end of Blackfriars Road that would act as a focal point for this historic node and junction. A tall building of up to 70m would have a minor beneficial impact on immediate views of the Circus and local context, particularly from London Road, Borough Road, Lambeth Road, Waterloo Road. A taller building should be set back from the immediate edge of the Circus, but close enough to mark the circus, where a lower, more contextual height should front the circus, taking into account adjoining building heights on the circus, the significance of the listed obelisk in the centre of the circus, the listed buildings on its southern side and the St George's Circus conservation area.
- 6.7.16 A tall element of a height up to 70m storeys could provide beneficial impacts by:
- Allowing an efficient use of land which can enhance the potential for the creation of new public space, east/west links and improved public realm
- 6.7.17 A tall element up to 70m storeys high could also have an adverse impact and new development at the node will need to consider:
- The potential minor impact on the significance of the protected vista LVMF 27A.2 from Parliament Square to Palace of Westminster, as the uppermost floors of a 70m tall building would be visible in the background of this view.
 - The potential impact on the significance of heritage assets and their settings within the local context, particularly on adjacent and nearby listed

buildings and conservation areas such as the listed Obelisk, St George's Circus and West Square conservation areas.

- Potential impact on the amenity of lower scale adjacent residential development to the east and west of Blackfriars Road, especially the Peabody Estate.
- Setback of buildings along street frontages, particularly to Blackfriars Road, Borough Road, Waterloo Road and Library Street and Blackfriars Road frontages.
- Potential provision of new routes and creation of new public spaces to break up the site.
- The design of massing along main street frontages and along any new routes proposed on the site.
- The design of a tall element up to 70m, in particular the upper floors where these appear above the roofline of existing buildings in local and wider views.
- The geometry of the Circus.

6.7.18 As the height of the testing increased the potential impact also increased, with a taller building likely to be seen from a wider area. Therefore a tall building over 30m while also having beneficial impacts could have moderate adverse impacts and can appear prominent over the lower scale of development and prominent on the skyline in local and wider views.

6.7.19 Heights above 70m could have a moderate adverse impact and be overly dominant and overbearing on the local townscape, nearby listed buildings, and of views within and across the St George's Circus conservation area, particularly in local views from London Road, where an excessive proportion of a 70m+ tall building would be visible above the London Road roof line.

6.7.20 The upper floors of a 70m+ and especially a 100m tall building could have a moderate adverse impact on the significance of the protected vista LVMF 27A.2 from Parliament Square to the Palace of Westminster, which is defined by the space between Big Ben and Portcullis House. Although only the upper floors would be visible within the background of the view, the adverse impact could be considered moderate due to the significance of the World Heritage Site and its Outstanding Universal Value. It is recognised that development in Lambeth could obscure greater heights at this location.

6.7.21 Excessive height at this location could also have an adverse impact on overall strategy for building heights within the north of the borough, as it is evident that although this location is historic, it is not of the order of the emerging gateway cluster at the north of Blackfriars Road or the town centre at Elephant and Castle, where the tallest buildings are appropriate. A 70m threshold is considered appropriate for this midpoint between the two.

6.8 Equalities analysis and sustainability appraisal

6.8.1 When preparing our analysis to inform the guidance in the SPD, the findings of the Equalities analysis (EA) and Sustainability appraisal (SA) were considered.

Equalities analysis

6.8.2 The Equalities analysis looked at the impacts associated with the implementation of the SPD. As we have been preparing the SPD guidance,

we have considered the following issues to ensure we minimise the impact on groups with protected characteristics:

- The aim of the public realm and open space, built form and heritage and building heights guidance is to create a high quality design of public squares, streets and spaces, ensuring development makes a positive contribution to the local character and distinctiveness and ensuring appropriate building heights. It seeks to improve linkages between existing and new open spaces and squares, creating an identity for Blackfriars Road. This will ensure that residents, workers and visitors alike enjoy the Blackfriars Road area and choose to spend time here.
- There are many development sites along and around the Blackfriars Road which provide the opportunity for a lot of change. The SPD seeks to ensure that we maximise these opportunities by ensuring improvements to public realm and requiring high quality architecture and buildings so that development is appropriate to the area. Overall this is likely to have positive impacts on all members of the community.
- However, there could be some more uncertain impacts on some groups. For example, the SPD supports proposals for taller buildings across parts of the SPD area. There could potentially be an uncertain/negative impact on families, particularly those with young children as it can be more difficult to provide adequate private amenity space in taller buildings. We are proposing to mitigate this by continuing to apply our Core Strategy family mix of housing policies, which require a range of different housing types, as well as through the SPD which only allows taller buildings in parts of the SPD area. We will also seek to mitigate this impact by encouraging developers to look at innovative ways to provide suitable amenity space in taller buildings such as through roof gardens and terraces.
- The SPD also requires buildings of 70 metres or taller to include a publically accessible area on upper floors where feasible, to help to mitigate the potentially uncertain/negative impact on some groups by opening part of the building up to the public.

Sustainability appraisal

- 6.8.3 The Sustainability appraisal tests how well the planning document considers social, economic and environmental issues in order to achieve sustainable development. At this stage of the document the guidance have been refined so that the appraisal found that the majority of the guidance in the SPD will have a positive impact. In some cases the guidance will have an uncertain impact. The findings of the appraisal were:

Significant positive impacts

- There is a significant amount of new development planned for Blackfriars Road which may offer a considerable opportunity for improvement to the public realm. The additional guidance relating to the protection and improvement of public realm and open space scored highly against the Sustainability Objectives; particularly those relating to the natural environment (SDO11 and SDO13), and promoting sustainable transport and reducing the need to travel by car (SDO 16).

Significant negative impacts

- The additional guidance on built form and heritage was identified as potentially having minor negative impact on SDO 6, to reduce contributions to climate change. Additional guidance on business space, mixed town centre use and built form and heritage were identified as potentially having minor negative impact on SDO 6, to reduce contributions to climate change. The reason for the negative impacts is that the quantum of new development is likely to have negative impacts upon climate change and air quality. However, it is felt that the negative impacts can be resolved through appropriate mitigation measures, in particular the application of Core Strategy policies 1, 13 and 14. The Sustainable Design and Construction SPD and Sustainability Assessment SPDs provide further details to applicants on the type of measures that should be introduced in order to mitigate the environmental impacts of development.

Uncertain Impacts

- Increasing the number of tall buildings may have an uncertain impact of vulnerability to flooding in the area. Allowing more tall buildings to locate along Blackfriars Road will mean that there are more people living, working or visiting a flood risk area. However, if no residential development is provided at ground floor level, mitigation measures can be incorporated into the new development to overcome the flood risk to residents.

6.8.4 The appraisal concluded that development would need to ensure design measures were implemented to ensure any impacts were mitigated accordingly. Where impacts are uncertain further assessment would need to be undertaken at the design stages of any new scheme.

6.9 Approach to building height and tall building guidance for the Blackfriars Road SPD area

6.9.1 Our testing and evaluation of the strategic building height options as well as review of equalities assessment and sustainability appraisal has concluded that we should consider guidance for the SPD area that addresses the following matters. The urban design background paper sets out more information about the development and justification of the building heights guidance including consideration of the EA and SA, which have informed the approach set out here.

Grain of development

6.9.2 Where development is proposed on Blackfriars Road or other main routes within the area, proposals should reinforce the existing character and ensure that the layout and appearance have a 'civic grain' with a larger scale, massing and building height, while enhancing permeability by introducing new links through larger sites, and active, but finer grain frontages

6.9.3 Proposals for sites off these main routes should be of 'finer grain' by incorporating principles such as a variety in height, massing, building setbacks and shift in architectural design to reduce the potential for massing to appear as a wall of development, particularly when viewed from street level.

New/improved links and public realm

- 6.9.4 The larger sites on Blackfriars Road offer the potential for new links and creation of significant amounts of meaningful public space. Tall buildings on these sites can enhance the potential to maximise the area available for provision of new public realm. This would also allow a tall building to be located within sufficient space around the building to ensure a considered relationship with any adjoining existing or proposed development. Smaller sites also offer potential for new links and provision or enhancement of existing public realm.

Potential for tall buildings / Building heights

- 6.9.5 The testing has identified that there are potential opportunities for tall buildings of landmark significance to assist in creating focal points at key locations along Blackfriars Road, as well as the continuation of the emerging cluster at its northern end. As a tall building can become a focal point in the local area and on the skyline their design and quality of building must be well considered and be of the highest quality.
- 6.9.6 There would be different benefits and impacts on each of the four locations tested and therefore the potential height of tall buildings should create a building height strategy for the Blackfriars Road.
- There is potential for further gateway taller buildings at the northern end of Blackfriars Road with tallest heights around the junction of Blackfriars Road, Southwark Street and Stamford Street. Building heights should consider the cumulative impact of the cluster on the skyline, the river front, and also step down to the east, west, south and to the river from this cluster.
 - There is potential for a single landmark building up to 70m to act as a focal point at the node/junction of Blackfriars Road, The Cut and Union Street, highlighting the transport hub at Southwark tube station.
 - There is potential for series of taller buildings up to 30m along the southern section of Blackfriars Road, which take into account the existing building height context and boulevard character of the road.
 - There is potential for a single landmark building up to 70m at the southern end of Blackfriars Road that would add definition within the townscape. Any taller element should be set back from St George's Circus

Heritage assets and their settings

- 6.9.7 There are a number of heritage assets located within and surrounding the SPD area. Some of the larger sites are located adjacent to heritage assets or within or partially inside a conservation area. In some of these locations there is the potential that new buildings and particularly tall buildings may be located within the setting, the background of a view of an asset or visible when seen from the setting of these assets. Particular consideration should be given to heritage assets in the immediate context of a proposed tall building. Where assets are located in the wider area, there is still potential for tall buildings to be visible when seen from the setting or in a view of the

heritage asset, and the potential impact on the appreciation of the asset assessed. Adverse impact on protected strategic views should be avoided.

Impact on local amenity

- 6.9.8 All new development must consider its potential impact on the amenity of surrounding development, public realm and public spaces. Where tall buildings are proposed, the potential impact on amenity can be increased and extended further to the surrounding area. The design of proposals should consider the adverse impacts on the surrounding area.

Existing context and heights

- 6.9.9 Where there are opportunities for tall development, the design of tall and large buildings must consider the relationship to the surrounding context, particularly the relationship to existing heights. Proposals should ensure that there is a well considered relationship between tall buildings and lower height surrounds.

Landmark buildings

- 6.9.10 Landmark buildings which are urban features designed can improve wayfinding and legibility within the Blackfriars Road area and the Borough and Bankside area. Therefore the design of these buildings and any adjacent development will need to consider how these buildings are articulated as landmarks and focal points. In particular there needs to be consideration of the spaces between buildings and the tops of buildings visible on the skyline when seen in views from the local and wider area. As the mass and bulk of these buildings is likely to be prominent in the streetscape or on the skyline, consideration to the design of visible elements of the buildings should ensure that the design reduces the bulk in the streetscape and on the skyline. In particular where the top of a building is visible on the skyline or above the roofline of existing buildings, attention should be taken to articulate the top of the building so that it becomes a feature.

Appendix 1 Study of contextual heights

The following are the heights of existing development and consented tall building proposals in the Blackfriars Road study area.

Existing Local Heights

- The development along the riverfront the including South Bank Tower, Sea Containers House (15 storeys), Ludgate House (10 storeys) and Sampson House (8 storeys) and River Court development (12 storeys). Adjoining development on the riverfront with the OXO Tower (8 storeys with a tower of approx 11 storeys) with lower height mixed use development to the south.
- From Stamford Street / Southwark Street south to the railway viaducts there is a mix of development with some height along the Blackfriars Road frontage (predominantly 5 to 9 storeys) and lower in the areas surrounding (predominantly 4 to 7 storeys). Columbo House (13 floors) facing the railway viaducts is a tall element out of context with its surrounds.
- South of the railway viaducts Palestra (12 storeys) provides a landmark on the corner of Union Street with Southwark station (1 storey) opposite. Residential and mix use development continue to the south (predominantly 4 to 8 storeys).

	<i>Height (m AOD)</i>	<i>Storeys (above ground)</i>
Existing tall buildings		
South Bank Tower	109.60m	30 storeys
Chimney, Tate Modern	96.2m	NA
Neo Bankside Pavilion C	86.75m	24 storeys
London Television Centre, Waterloo	84.7m	27 storeys
OXO Tower	67m	11 storeys
Neo Bankside Pavilion B	68.55m	18 storeys
Blue Fin Building (Bankside 1)	58.3m	13 storeys
Palestra	56.3m	12 storeys
Ludgate House	50.49m	10 storeys
Bankside Lofts, 65 Hopton Street	47m	15 storeys
Columbo House	46.64m	13 storeys
Bankside 2 & 3	46.3m	10 storeys
Sea Containers House	45.72m	15 storeys
Student housing, Lavington Street (corner Great Suffolk Street)	44.25m	14 storeys
Neo Bankside Pavilions A & D	42.65m	12 storeys
Turbine Hall and lightbeam, Tate Modern	41.92m	7 storeys
Sampson House	41m	8 storeys
River Court (rooftop plant)	40.5m	12 storeys
Rennie Court (rooftop plant)	40.3m	12 storeys
Friars Bridge Court	37.1m	10 storeys
Bankside House, Sumner Street	36m	12 storeys
Styles House, Hatfields	36m	8 storeys

Consented applications for tall buildings under construction

	<i>Height (m AOD)</i>	<i>Storeys (above ground)</i>
No. 1 Blackfriars Road South Bank Tower -	165m	52 storeys
11 additional floors	154.8m	42 storeys
Tate Modern Extension	70.4m	11 storeys
46-49 Blackfriars Road	47.93m	14 storeys

Consented applications for tall buildings

Sampson and Ludgate: Ludgate B	169m	49 storeys
No. 20 Blackfriars Road - Residential Tower	148m	42 storeys
No. 20 Blackfriars Road - Office Tower	105m	23 storeys
Sampson and Ludgate: Sampson B	112m	31 storeys
Sampson and Ludgate: Sampson C	98m	27 storeys
231-240 Blackfriars Road	89m	20 storeys
Sampson and Ludgate: Sampson C	98m	27 storeys
6 Paris Garden & 20-21 Hatfields	41.3m	13 storeys
Wedge House	45.28m	11 storeys
Bankside House 2 additional floors	41.97m	10 storeys
Kings Reach Tower – Atrium building	39m	10 storeys
169-170 Blackfriars Road	approx 30m	Up to 10 storeys
Sea Containers House New building on site	42.9m	9 storeys

Appendix 2 : Views assessment

assessment is an objective assessment of what is actually visible in the view.

A3.1 Identification of testing views

A3.1.1 We have identified a number of views for testing and assessing the potential impact of building heights and taller buildings.

A3.1.2 These have been identified from the following sources:

- Views identified in the London Views Management Framework
- Views identified in other planning policy documents, such as other borough designated views
- Views identified in characterisation studies or conservation area appraisals
- Views identified through site analysis or from site visits
- Views identified through public consultation

A3.1.3 More information on identification of testing views is set out in sections 6.6.8 to 6.6.23 of this study.

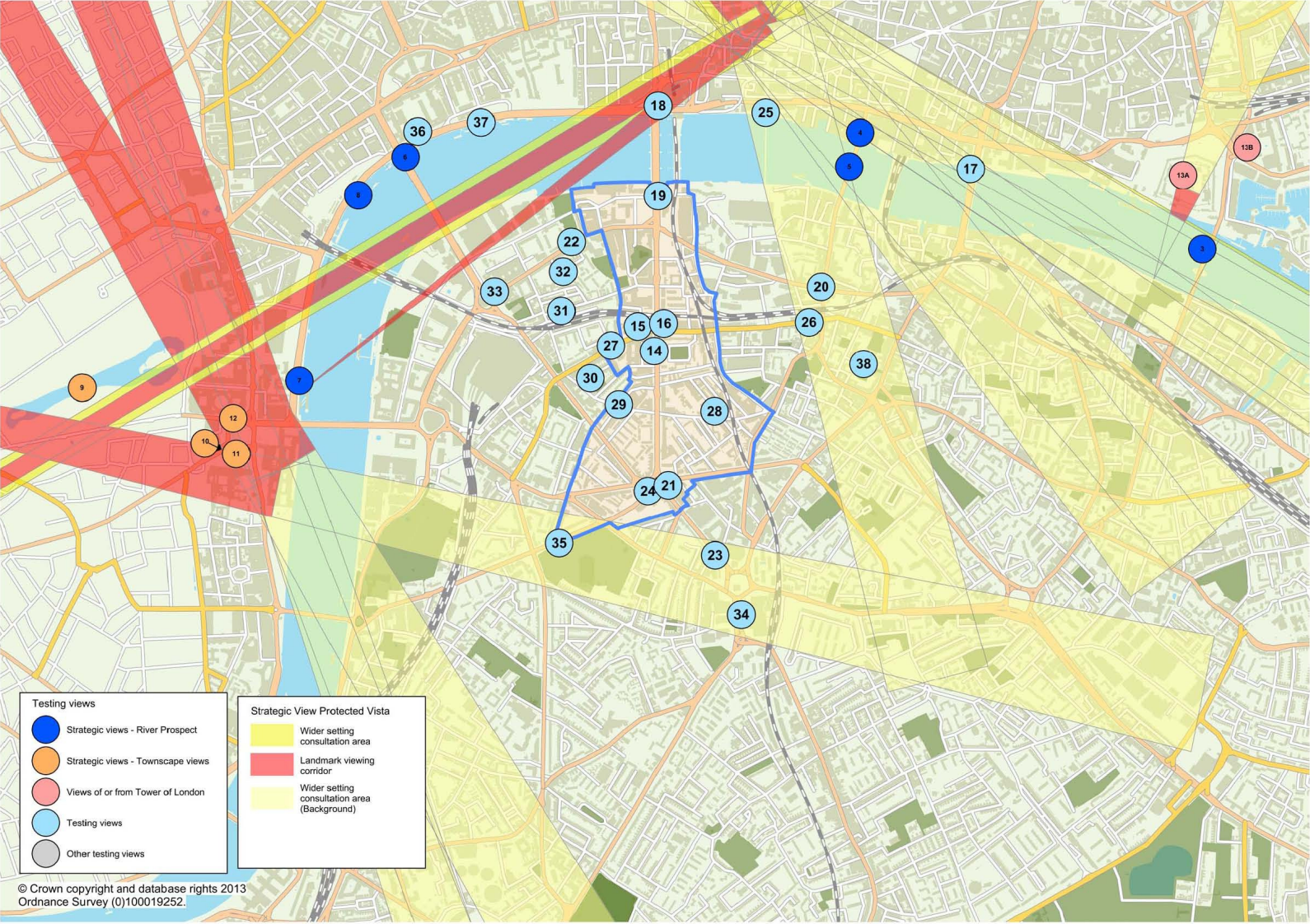
A3.1.3 Figure 5 sets out the all the views identified for testing

A3.1.4 The detailed views assessment that is presented in this appendix are highlighted in red text in Table A1. Although the detailed views assessment is not presented for the remaining views identified in this Table A1 (i.e. views in black text in the Table A1), this information has informed our study and been incorporated into the conclusions of this assessment. It is important to note that the views

Table A1 : Views identified for testing

View Number	LVMF designation	Name	Testing views		
			14		
					Blackfriars Road from the Cut looking north
			15		Blackfriars Road (corner of the Cut) east side looking so
			16		Blackfriars Road (corner of the Cut) west side looking so
LVMF : London Panorama					
1	LVMF 1A.1	Alexandra Palace	17		London Bridge looking west
2	LVMF 8A.1	Westminster Pier - close to orientation plaque	18		Blackfriars Bridge looking south
			19		Blackfriars Rd head looking south
LVMF : River prospects					
3	LVMF 10A.1	Tower Bridge - north basion - Upstream	20		Southwark Street
4	LVMF 12A.1	Southwark Bridge - The Upstream Pavement	21		St Georges Circus
5	LVMF 12A.2	Southwark Bridge - The Upstream Pavement	22		Stanford Street - north pavement
6	LVMF 15B.1	Waterloo Bridge - The Downstream Pavement	23		London Road
7	LVMF 20A.1	Victoria Embankment between Waterloo and Westminster Bridges - Opposite County Hall	24		Lambeth Road
8	LVMF 20B.1	Victoria Embankment between Waterloo and Westminster Bridges - At Cleopatras Needle	25		Millennium Bridge from north bank
			26		Union Street and Pepper Street looking west
			27		The Cut from Greet Street looking east
			28		Rushworth Street looking north Kings Bench CA
LVMF : London Panorama					
9	LVMF 26A.1	St James' Park to Horse Guards Road	29		Valentines Place looking north
10	LVMF 27A.1	Parliament Square to Palace of Westminster: south-west - the traffic island north	30		Mitre Road - Ufford Street CA
11	LVMF 27A.2	Parliament Square to Palace of Westminster: south-west - the traffic island south	31		Roupell Street
12	LVMF 27B.1	Parliament Square to Palace of Westminster: north pavement - entering from St James's Park	32		Aquinas Street
			33		Stamford Street near Waterloo Bridge
			34		Newington Butts in E&C
			35		Lambeth Road
World Heritage Site View : Tower of London					
			36		Somerset House River Terrace
13A		Tower of London - View from Inner Ward	37		Embankment near Temple
13B		Tower of London - from Mansell Street	38		Monument viewing gallery
			39		St Pauls Viewing gallery looking south west

Figure 5 : Map of views identified for testing



A3.2 Views assessment and options testing

A3.2.1 The following section set out an assessment of the testing views and identifies the following for each view:

- What is important in the view or why is the view of importance
- What type of view is it and what is visible in the view
- What is the potential impact of new development in the view

The views which are included in this section are of the following

- Views along main routes within and the SPD area.
- Views of or from the setting of heritage assets including conservation areas and listed buildings

A3.2.2 We have tested each of the strategic building height options in the views and have set out an assessment of the potential impact of testing at different heights.

- The SPD option which sets the height guidance in SPD 5 Building Heights of the draft Blackfriars Road SPD
- The taller testing height that has been discounted due to negative impact.

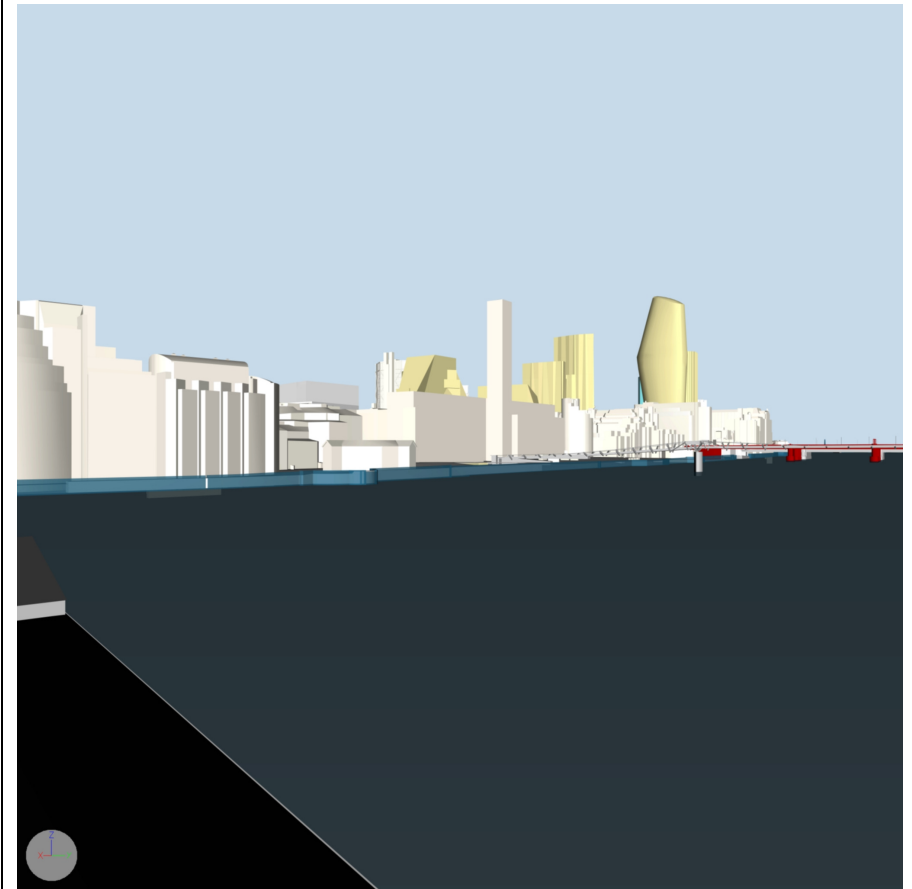
A3.2.3 This assessment has informed our approach to preparing the building height guidance in the SPS as set out in section 6 of this study.

View 5 Southwark Bridge - The Upstream Pavement

- This is a protected river prospect view LVMF 12A.2 , which is an upstream view from Southwark Bridge towards the South Bank. Predominant features in this view are the Tate Modern art gallery, Millennium and Blackfriars Road Bridges visible in the mid ground.
- All visible are the consented schemes at 1 Blackfriars Road, 20 Blackfriars Road, 240 Blackfriars Road and Tate Modern extension.
- The Westminster Palace WHS is visible in the background of the view.
- Consented schemes at the northern end of Blackfriars Road will already block the view of Westminster. Taller heights on the riverfront will need to consider the relationship between the consented buildings and the chimney of the Tate Modern.

Figure 1.

Indicative view (including consented schemes)
Please note that the tall buildings in this view that are pale cream in colour are schemes that have already received planning consent.



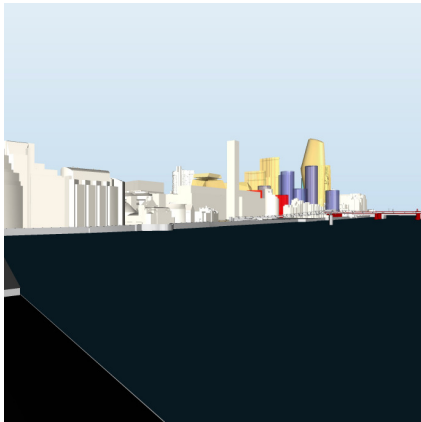
Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



The heights tested at the central node, the southern section of Blackfriars Road and St George's Circus tested will not be visible in the view.

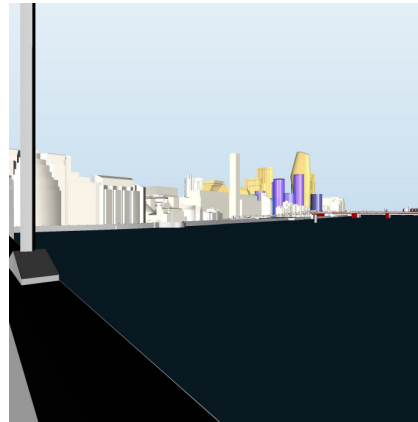
The heights tested for the northern section of the Blackfriars Road will have a moderate impact on the view, and will need to consider the relationship between the consented buildings and the chimney of the Tate Modern.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



The heights tested at the central node, the southern section of Blackfriars Road and St George's Circus tested will not be visible in the view.

The heights tested for the northern section of the Blackfriars Road will have a moderate impact on the view, and will need to consider the relationship between the consented buildings and the chimney of the Tate Modern.

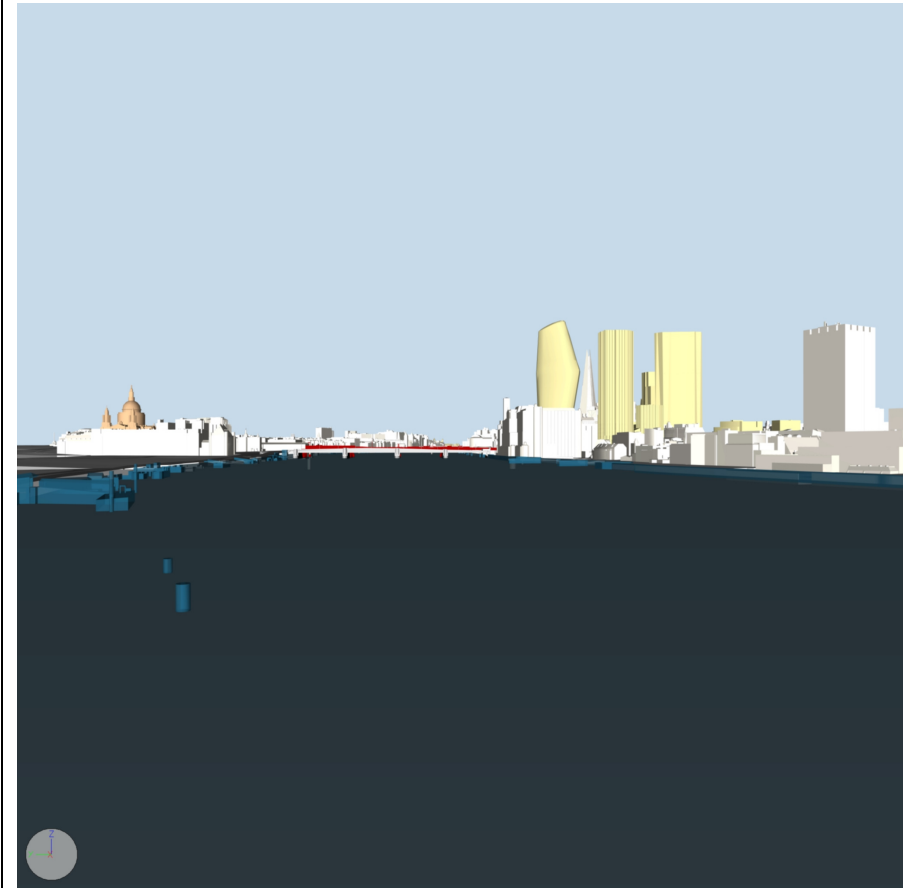
View 6 Waterloo Bridge - The Downstream Pavement

- This is a protected river prospect view LVMF 15B.1 , which is a downstream view from the northern end of Waterloo Bridge. St Paul's Cathedral is the predominant feature of this view, with Blackfriars Bridge, Oxo Tower and Sea Containers House and the Shard located to the southern side of the view.
- The Old Barge House Alley conservation area is visible in the mid-ground of the view in front of the consented cluster of tall buildings at 1 Blackfriars Road, 20 Blackfriars Road, 240 Blackfriars Road and the South Bank tower extension.
- Taller heights on the riverfront will need to consider their relationship with the consented buildings.

Figure 2.

Indicative view (including consented schemes)

Please note that the tall buildings in this view that are pale cream in colour are schemes that have already received planning consent.



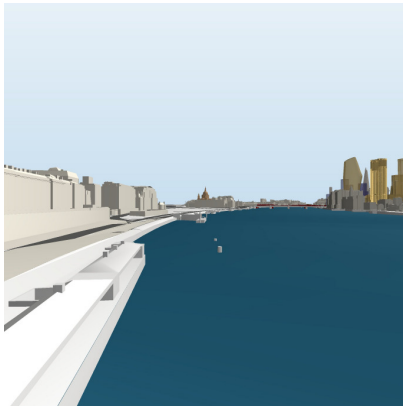
Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



The heights tested at the central node, the southern section of Blackfriars Road and St George's Circus tested will not be visible in the view.

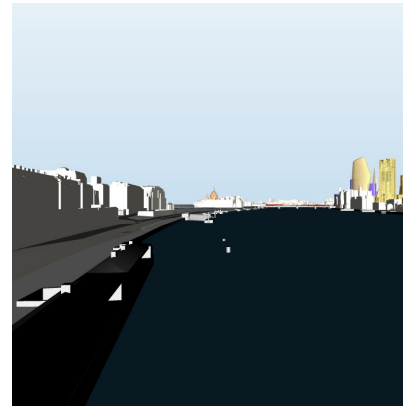
The heights tested for the northern section of the Blackfriars Road will have a minor impact on the view, and will need to consider the relationship with the consented buildings. Taller heights will not impact the view of St Pauls Cathedral.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



The heights tested at the central node, the southern section of Blackfriars Road and St George's Circus tested will not be visible in the view.

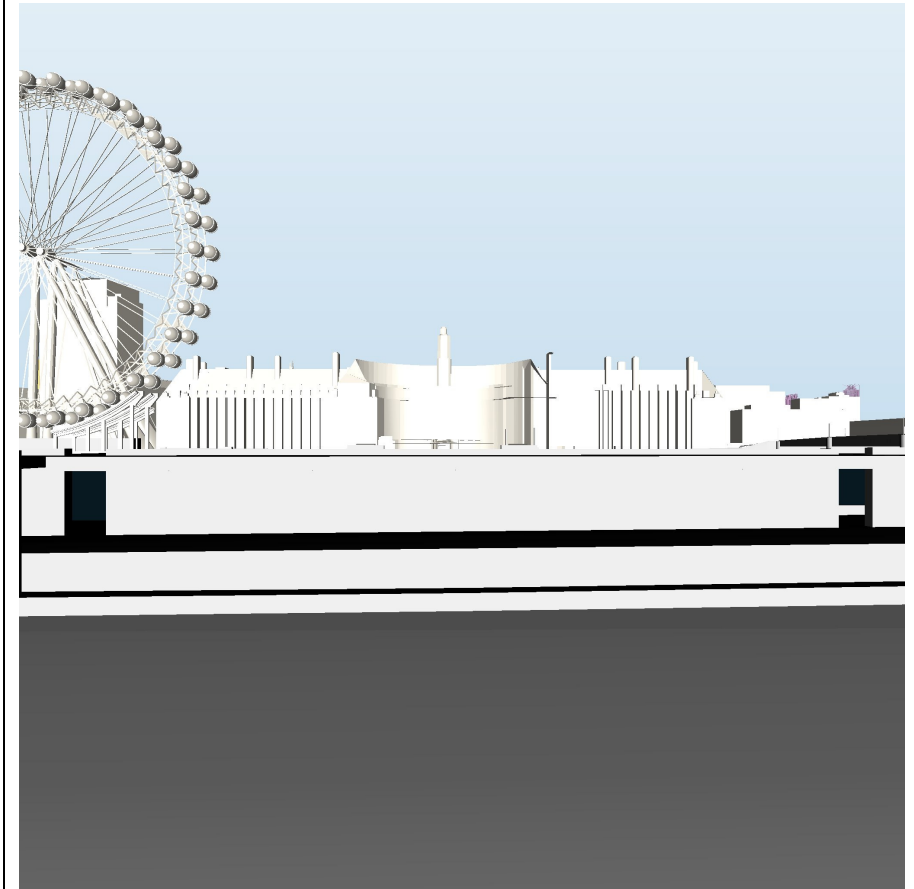
The heights tested for the northern section of the Blackfriars Road will have a minor impact on the view, and will need to consider the relationship with the consented buildings. Taller heights will not impact the view of St Pauls Cathedral.

View 7 Victoria Embankment between Waterloo and Westminster Bridges - Opposite County Hall

- This is a protected river prospect view LVMF 20A.1 , which is a Thames view primarily of County Hall, the London Eye and the Shell building from Victoria Embankment between Waterloo and Westminster Bridges.
- All visible in the background are the consented schemes at 1 Blackfriars Road, the South Bank Tower extension, Doon Street Tower and small section of the dome of St Pauls Cathedral
- Taller heights on the riverfront will need to consider the relationship between the consented buildings at the northern end of Blackfriars Road.

Figure 3.

Indicative view (including consented schemes)



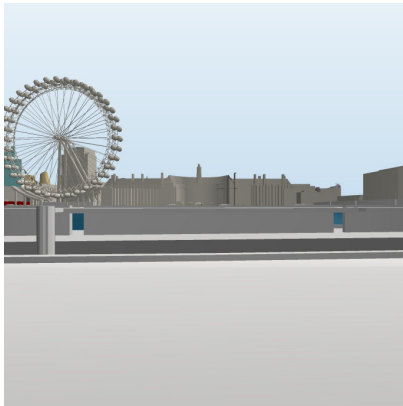
Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



The heights tested at the central node, the southern section of Blackfriars Road and St George's Circus tested will not be visible in the view.

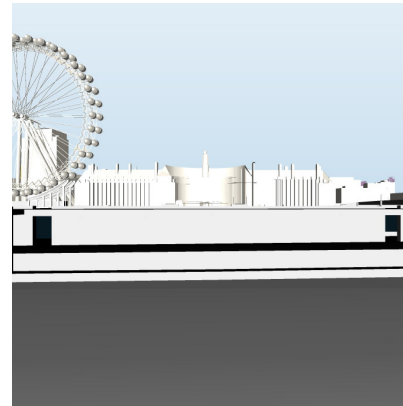
The heights tested for the northern section of the Blackfriars Road will have a negligible impact on the view, and will need to consider the relationship with the consented buildings.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



The heights tested at the central node, the southern section of Blackfriars Road and St George's Circus tested will not be visible in the view.

The heights tested for the northern section of the Blackfriars Road will have a negligible impact on the view, and will need to consider the relationship with the consented buildings.

**View 11 Parliament Square to Palace of Westminster:
south-west - the traffic island south**

- This is protected vista LVMF 27A.2 which is a view from the south-west corner of Parliament Square to the Palace of Westminster and Portcullis House. County Hall on the southern bank of the River Thames is visible in the background between Big Ben and Portcullis House.
- No consented schemes within the Blackfriars Road SPD are visible in this view.
- Any new tall building development which appears in the background of this view will need to consider the potential impact on the setting of this World Heritage Site

Figure 4.

Indicative view (including consented schemes)



Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



The heights tested at the central node, the southern section of Blackfriars Road and St George's Circus tested will not be visible in the view.

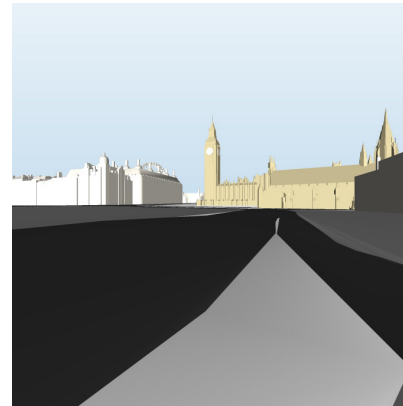
The heights tested for the northern section of the Blackfriars Road will not be visible in the view.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road

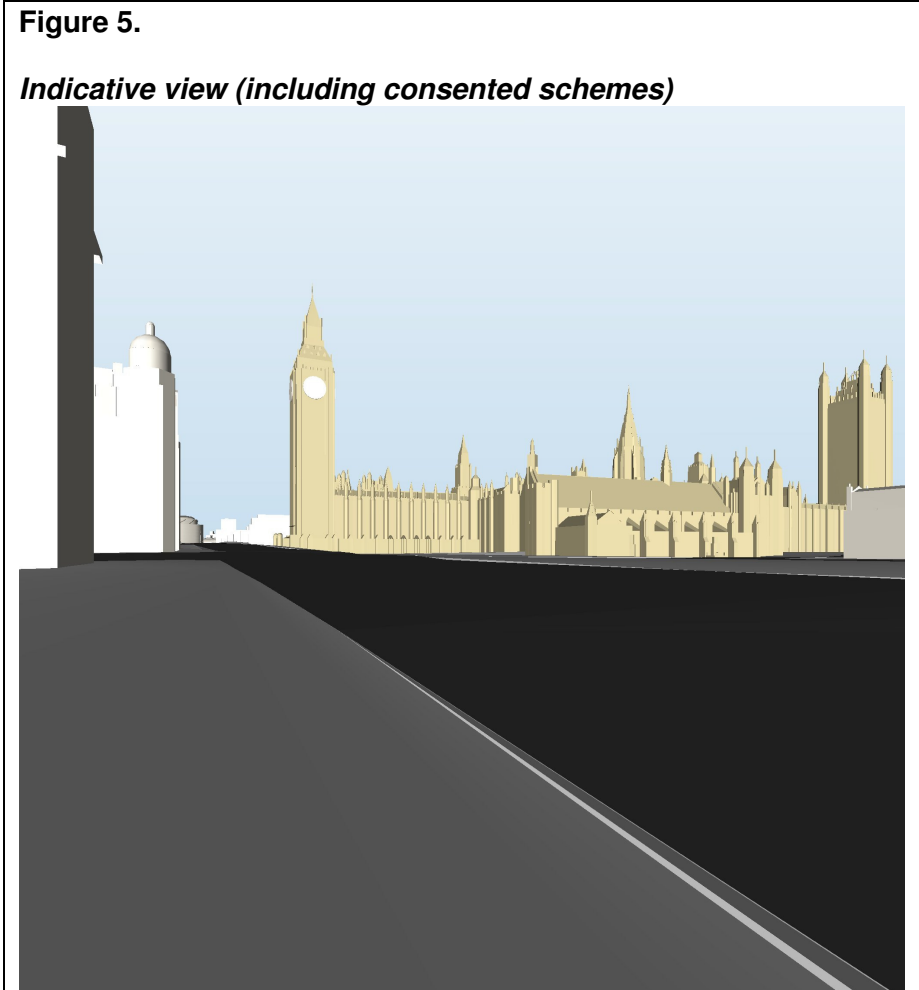


The heights tested at the central node, the southern section of Blackfriars Road and St George's Circus tested will not be visible in the view.

The heights tested for the northern section of the Blackfriars Road will not be visible in the view.

**View 12 Parliament Square to Palace of Westminster:
north pavement - entering from St James's Park**

- This is protected vista LVMF 27A.2 which is a view from the north-west corner of Parliament Square to the Palace of Westminster and Portcullis House. Westminster Bridge is visible in the background between Big Ben and Portcullis House.
- No consented schemes within the Blackfriars Road SPD are visible in this view.
- Any new tall building development which appears in the background of this view will need to consider the potential impact on the setting of this World Heritage Site, especially the gap between Big Ben and Portcullis House which is particularly sensitive.



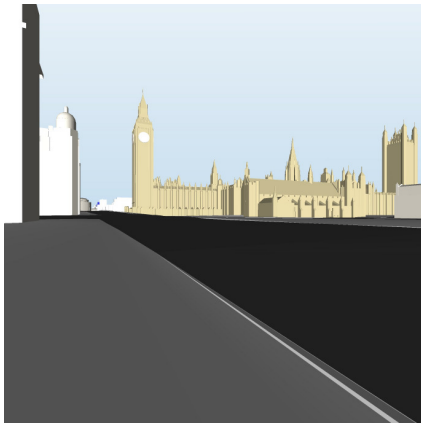
Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



The heights tested at the central node and the southern section of Blackfriars Road will not be visible in the view. The heights tested for the northern section of the Blackfriars Road will not be visible in the view.

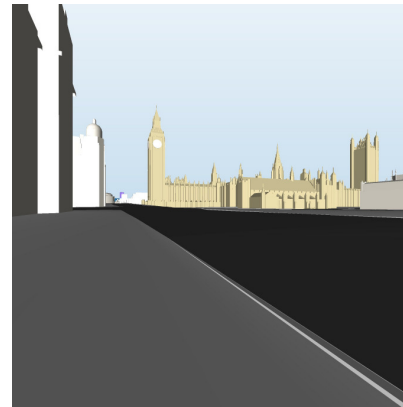
However, the height tested at St Georges Circus will be visible in background of view between Big Ben and Portcullis House and have a minor impact, due to the high significance value of the World Heritage Site, and sensitivity of development within the gap between Big Ben and Portcullis House

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



The heights tested at the central node and the southern section of Blackfriars Road will not be visible in the view. The heights tested for the northern section of the Blackfriars Road will not be visible in the view.

However, the height tested at St Georges Circus will be visible in background of view between Big Ben and Portcullis House and have a moderate impact, due to the high significance value of the World Heritage Site, and sensitivity of development within the gap between Big Ben and Portcullis House. The visible section of the taller element in the view is approximately 10 – 30 metres in height as part of the flank and top sections of the tall building are visible.

View 13A Tower of London - View from Inner Ward

- This is a view from the Inner Ward of the Tower of London, a World Heritage Site. The Queens House is visible in the foreground of the view. It is noted that this view is a dynamic view as the viewer moves through the Inner Ward across Tower Green. The Shard has a dominant position in the skyline in the background of this view
- No consented schemes within the Blackfriars Road SPD are visible in this view.

Figure 6.

Indicative view (including consented schemes)



Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



The heights tested at the northern section, central node, southern section and St George's Circus will not be visible in the view.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road. No upper limit at Northern section of Blackfriars Road



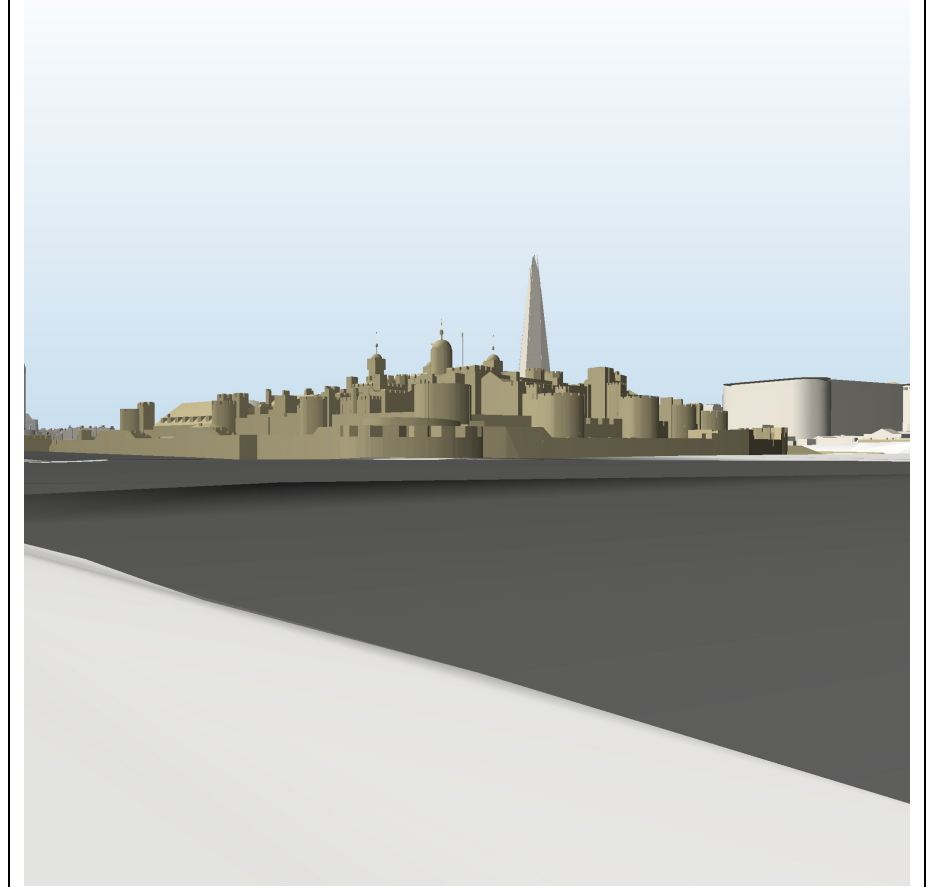
The heights tested at the northern section, central node, southern section and St George's Circus will not be visible in the view.

View 13B Tower of London, from Mansell Street

- This is a view from across the World Heritage Site of the Tower of London from Mansell Street that is located to the north east of the site. The Shard has a dominant position in the skyline in the background of this view
- No consented schemes within the Blackfriars Road SPD are visible in this view.

Figure 7.

Indicative view (including consented schemes)



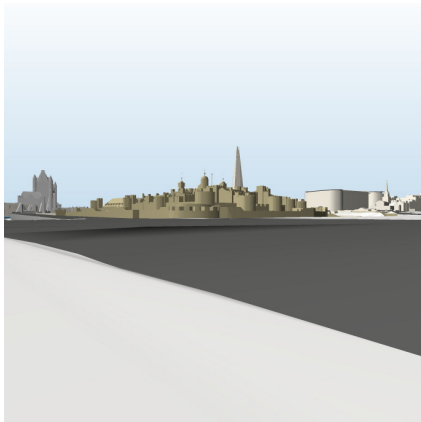
Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



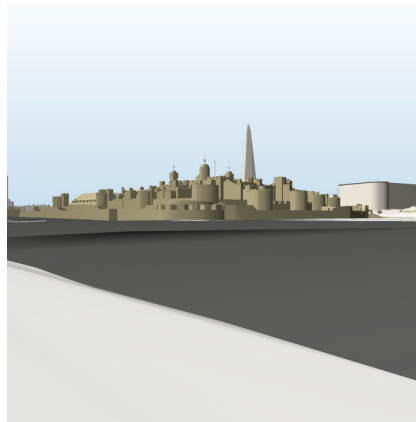
The heights tested at the northern section, central node, southern section and St George's Circus will not be visible in the view.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



The heights tested at the northern section, central node, southern section and St George's Circus will not be visible in the view.

View 14 Blackfriars Road from the Cut looking north

- This is an axial view along Blackfriars Road to the north, to the south of the junction between Blackfriars Road, The Cut and Union Street. Each side of the view is framed by building frontages on both sides of Blackfriars Road.
- The Southwark tube station, Palestra building and railway viaduct are prominent in the mid-ground of the view, while the building heights step with the consented schemes at 1 Blackfriars Road, 20 Blackfriars Road, and 240 Blackfriars Road that visible on the skyline in the background.
- Consideration must be given to the setting of the Grade II listed terrace on the western side of Blackfriars Road to the south of the junction, the relationship to the Palestra building and the taller cluster to the north, and the residential area to the west of the tube station.

Figure 8.

Indicative view (including consented schemes)

Please note that the tall buildings in this view that are pale cream in colour are schemes that have already received planning consent.



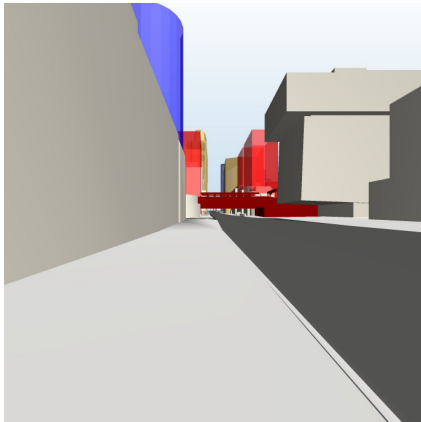
Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



A taller feature than Palestra on the Southwark tube site would define the node and transport link. Building heights should lower then step up to the northern end of Blackfriars Road and the consented cluster.

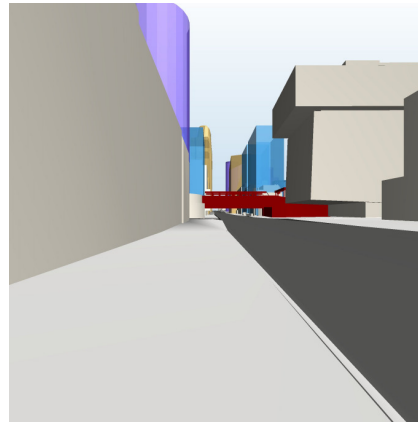
Consideration should be given to a taller element as it may be overbearing relative to surrounding heights and particularly impact on setting of listed terraces to south and residential to west

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



A taller feature than Palestra on the Southwark tube site would define the node and transport link. Building heights should lower then step up to the northern end of Blackfriars Road and the consented cluster.

Consideration should be given to a taller element as it may be overbearing relative to surrounding heights and particularly impact on setting of listed terraces to south and residential to west

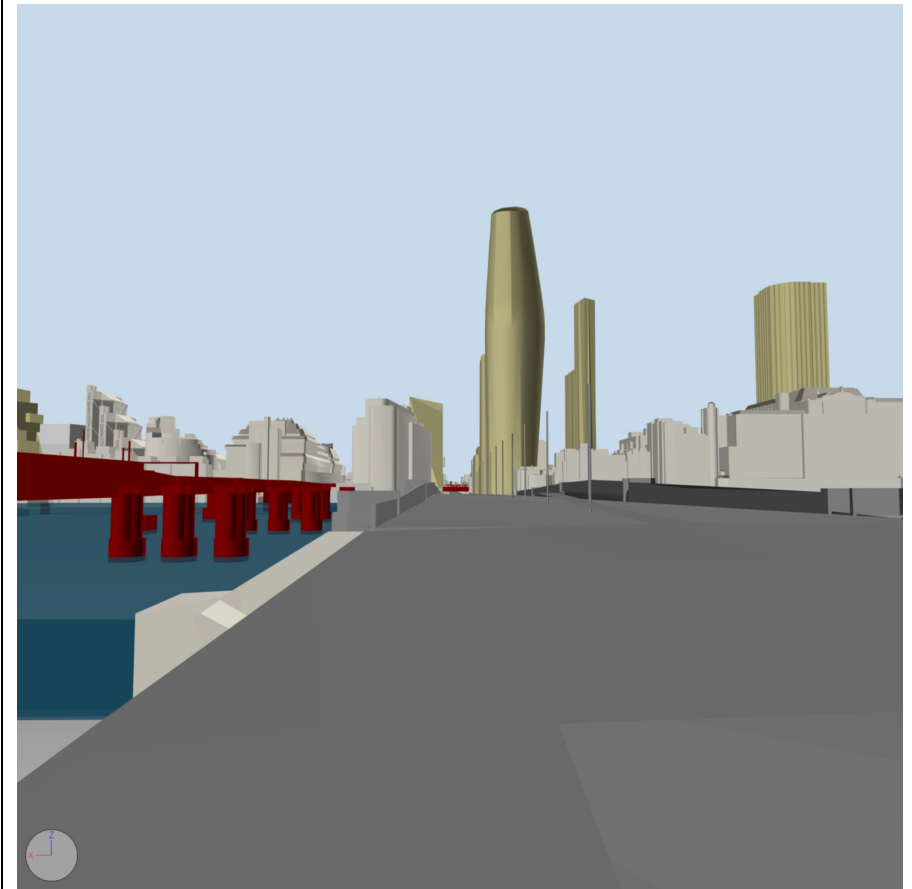
View 18 Blackfriars Bridge looking south

- This is an axial view along Blackfriars Bridge to the south, to the south of the junction between Blackfriars Road, The Cut and Union Street. Each side of the view is framed by building frontages on both sides of Blackfriars Road.
- The Samson and Ludgate buildings, Sea Containers House and the consented schemes at 1 Blackfriars Road, 20 Blackfriars Road, and 240 Blackfriars Road are visible on the skyline. The new Blackfriars station that spans the River Thames is visible in the east of the view.
- Taller heights on the riverfront will need to consider the relationship between consented buildings and lower height surrounds. Taller heights around Southwark tube, the southern section of Blackfriars Road and St George's Circus may be become visible in the view behind the northern consented cluster.

Figure 9.

Indicative view (including consented schemes)

Please note that the tall buildings in this view that are pale cream in colour are schemes that have already received planning consent.

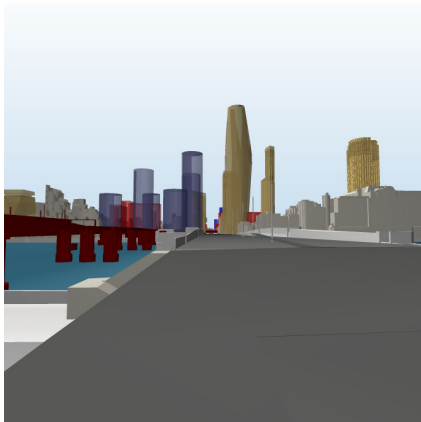


Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road. No upper limit at Northern section of Blackfriars Road



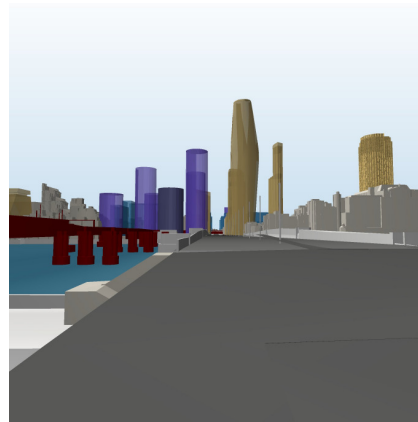
Taller heights on the riverfront will need to consider relationship between consented buildings and lower height surrounds.

Heights around Southwark tube are visible in the view behind the consented taller schemes. Heights to the south also become visible in the view.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road. No upper limit at Northern section of Blackfriars Road



Taller heights on the riverfront will need to consider relationship between consented buildings and lower height surrounds.

Heights around Southwark tube are visible in the view behind the consented taller schemes. Heights to the south also become visible in the view.

View 20 Southwark Street, looking west

- This is an axial view looking west towards the junction between Southwark Street, Blackfriars Road and Stamford Street. Each side of the view is framed by building frontages on both sides of Southwark Street.
- The consented schemes at 1 Blackfriars Road, 20 Blackfriars Road and 240 Blackfriars Road are visible in the background of the view.
- New tall building development will need to consider the relationship with the consented buildings.

Figure 10.

Indicative view (including consented schemes)

Please note that the tall buildings in this view that are pale cream in colour are schemes that have already received planning consent.



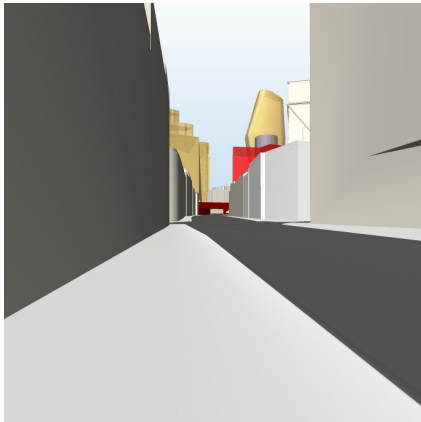
Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



Heights tested in the central and southern section of Blackfriars Road will not be visible in this view

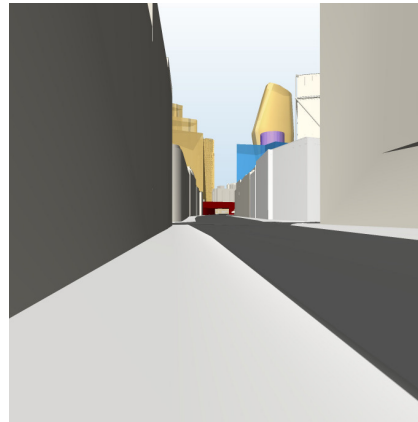
The heights tested for the northern section of the Blackfriars Road will have a negligible impact on the view, and will need to consider the relationship with the consented buildings.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



Heights tested in the central and southern section of Blackfriars Road will not be visible in this view

The heights tested for the northern section of the Blackfriars Road will have a negligible impact on the view, and will need to consider the relationship with the consented buildings.

View 23 London Road, looking north

- This is an axial view looking north towards St George's circus along London Road. Each side of the view is framed by building frontages on both sides of Southwark Street, with the height stepping up to the northern side of St George's Circus at Maclaren House. The tallest element in the view is the consented 20 Blackfriars Road that is visible on the skyline in the background.
- The view is the approach from Elephant and Castle from south towards St George's Circus Conservation Area and the Grade II* listed obelisk and Grade II listed terraces on and to the south of the circus along London Road
- New tall building development which appears in the mid and background of the view of the conservation area and the setting of listed heritage assets will need to consider the potential impact and relationship.

Figure 11.

Indicative view (including consented schemes)

Please note that the tall buildings in this view that are turquoise in colour are schemes that have already received planning consent.



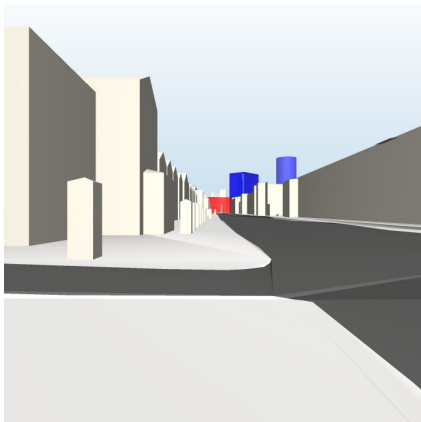
Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



The taller heights at the circus would be visible above the roofline, with both Erlang House and Maclaren House sites being approximately 1/4 visible. A taller height could provide a landmark and aid legibility at a focal point, but should be relative to the importance of the node within the wider context.

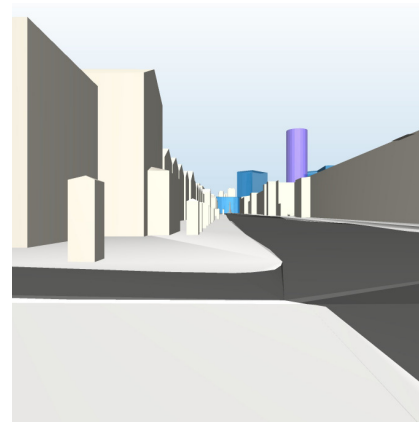
New tall building development will need to consider the potential impact and relationship with the conservation area and the setting of listed heritage assets. Consideration should be given to surrounding heights and nearby residential areas.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



The taller heights at the circus would be visible above the roofline, with both Erlang House and Maclaren House sites being approximately 1/2 visible. A taller height could provide a landmark and aid legibility at a focal point, but should be relative to the importance of the node within the wider context.

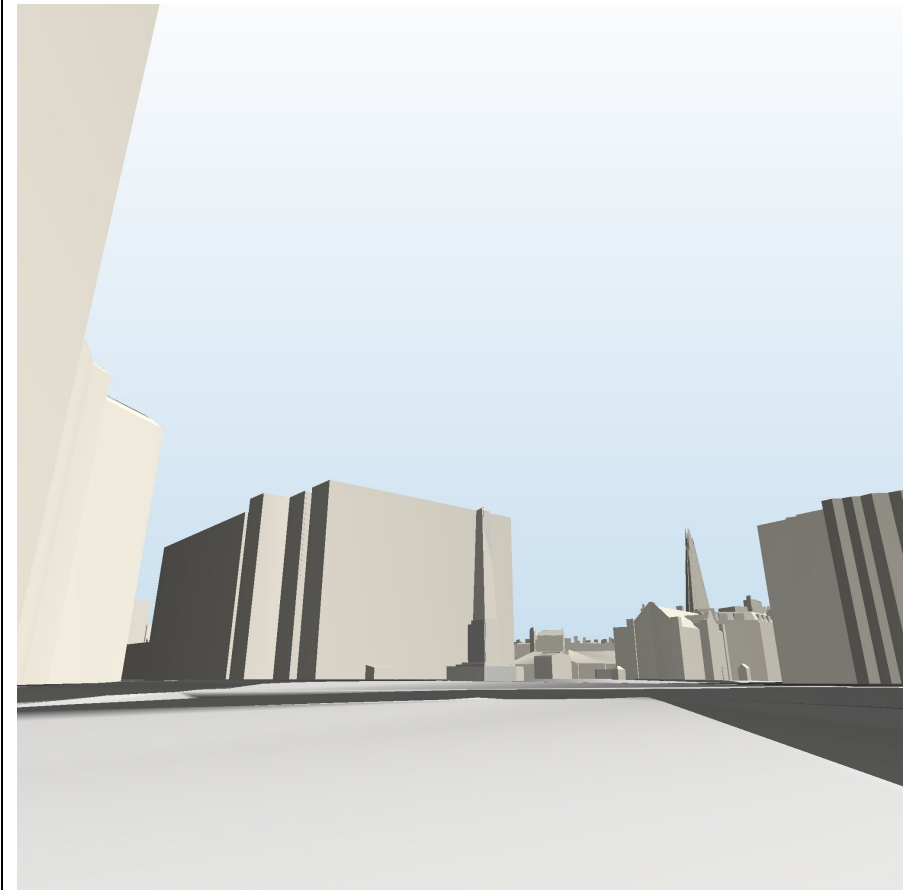
New tall building development will need to consider the potential impact and relationship with the conservation area and the setting of listed heritage assets. Consideration should be given to surrounding heights and nearby residential areas.

View 24 Lambeth Road, looking east on St George's Circus

- This is a townscape view of St George's Circus looking north east towards the Shard in the background of the view. The geometry and three sides of the Circus are clearly visible. Erlang and Maclaren Houses are prominent in the foreground with the Grade II* listed obelisk acting as a focal point.
- The view is one of the primary views of the St George's Circus Conservation Area and includes the Grade II listed terrace on the south eastern side of the Circus.
- New tall building development will need to consider the potential impact and relationship on the conservation area and the setting of listed heritage assets.

Figure 12.

Indicative view (including consented schemes)



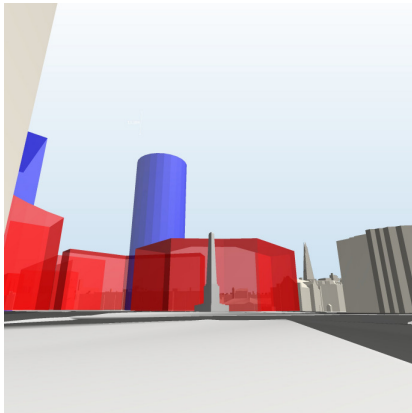
Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



The lower heights at the circus (20m) would be contextual response, while Erlang House would be approximately 1/2 visible above the St George's Circus roofline. New tall building development will need to consider the potential impact and relationship with the conservation area and the setting of listed heritage assets. Consideration should be given to surrounding heights and nearby residential areas

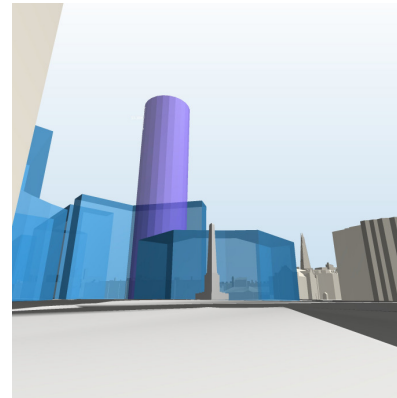
A taller height could provide a landmark and aid legibility at a focal point, but should be relative to the importance of the node within the wider context.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road

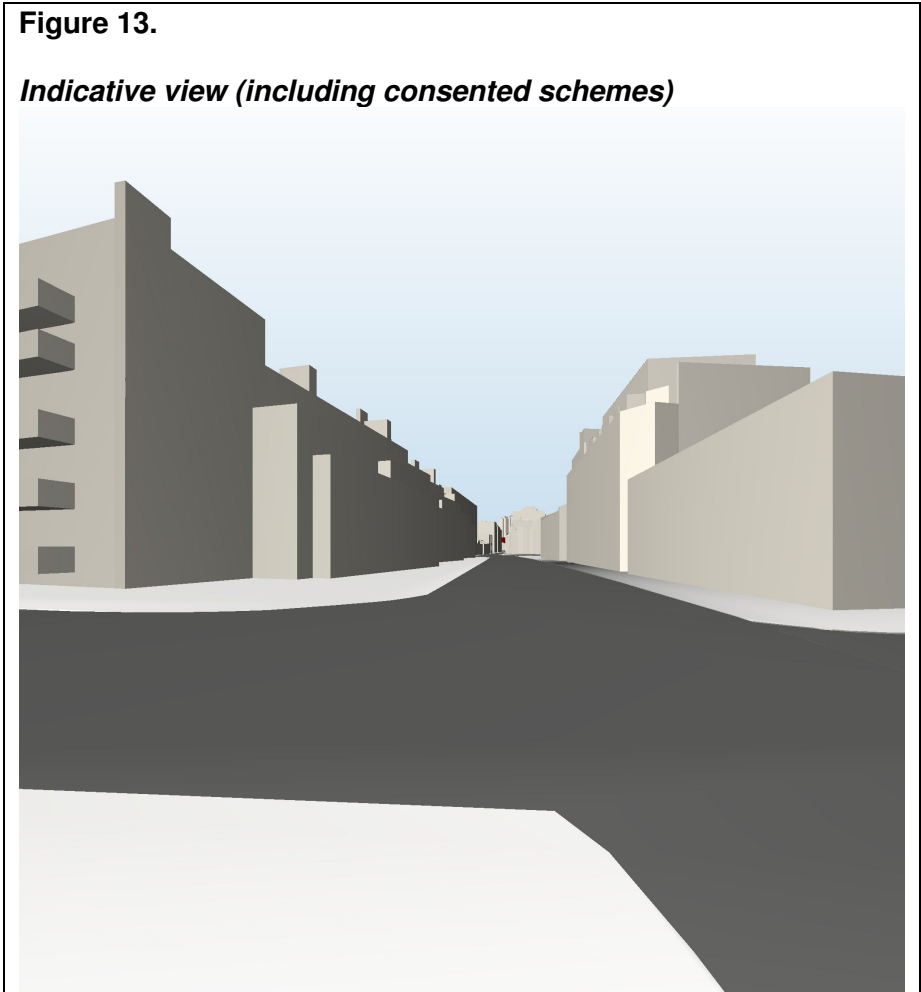


The lower heights at the circus (20m) would be a contextual response. Erlang House at approximately 2/3 visible above roofline would be overbearing and out of context with surrounds. McLaren House is also just visible.

The height on the southern section of Blackfriars Road would also be out of context due to its overbearing nature. New tall building development will need to consider the potential impact and relationship with the conservation area and the setting of listed heritage assets. Consideration should be given to surrounding heights and nearby residential areas. A taller height could provide a landmark and aid legibility at a focal point, but should be relative to the importance of the node within the wider context.

View 26 Union Street and Pepper Street looking west

- This is an axial view of Union Street looking west from the junction with Pepper Street. Each side of the view is framed by building frontages on both sides of Union Street of a consistent scale.
- New tall building development which appears in the background of the view, especially at the central node of Union Street and Blackfriars Road could improve townscape legibility.



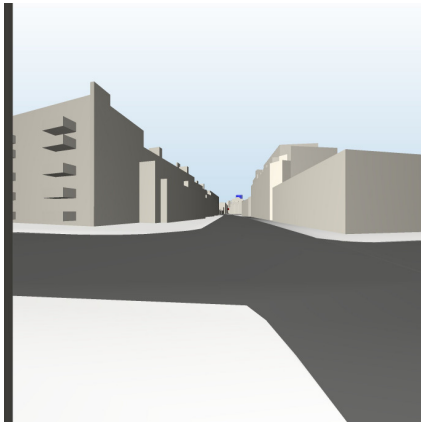
Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



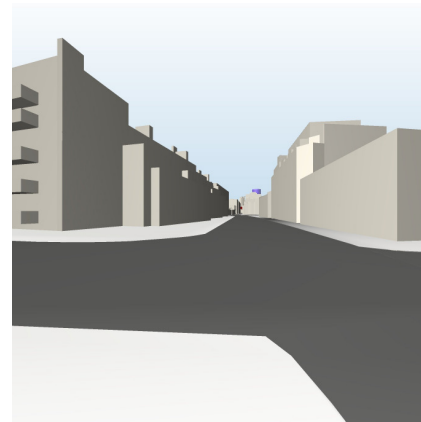
The heights tested will not be visible in the view.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



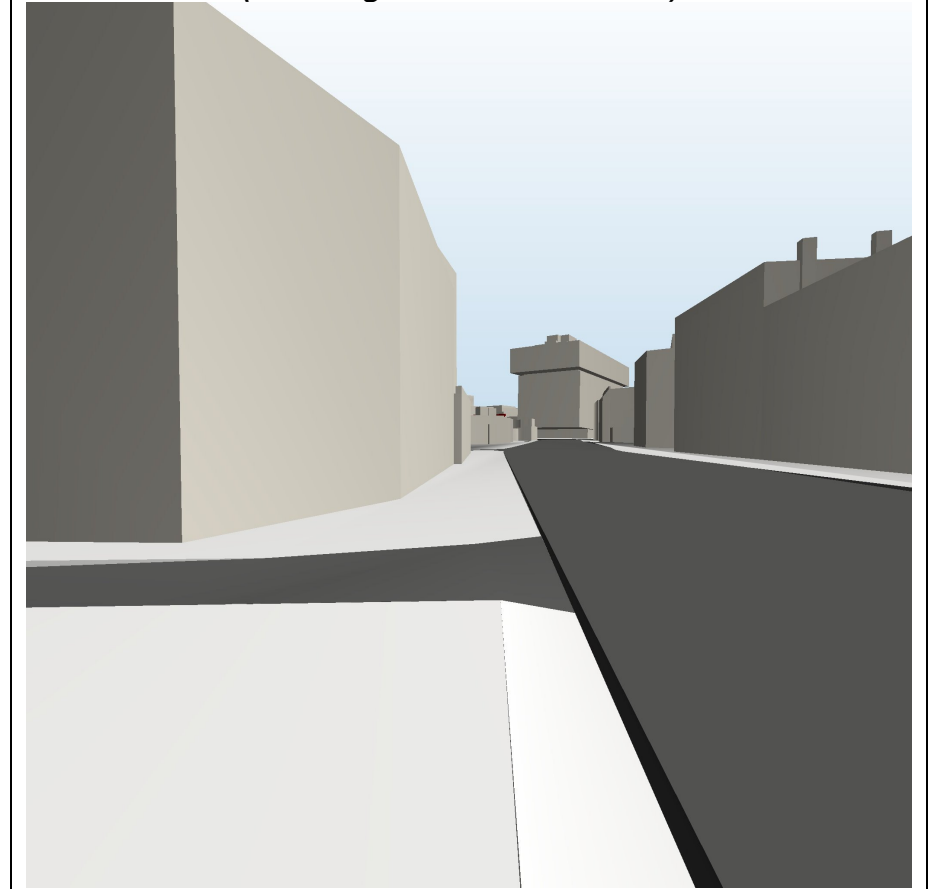
The taller height at Southwark tube would be visible 1/5 above Palestra.

View 27 The Cut from Greet Street looking east

- This is an axial view along The Cut looking west towards the junction of Blackfriars Road, The Cut and Union Street. Each side of the view is framed by building frontages, which does vary in height on the northern side of the road.
- The Southwark tube station and Palestra building are prominent in the mid-ground of the view.
- Consideration must be given to the setting of the Grade II listed buildings on the southern side of the junction, the relationship with the Palestra building, and the residential area to the west of the tube station.

Figure 14.

Indicative view (including consented schemes)



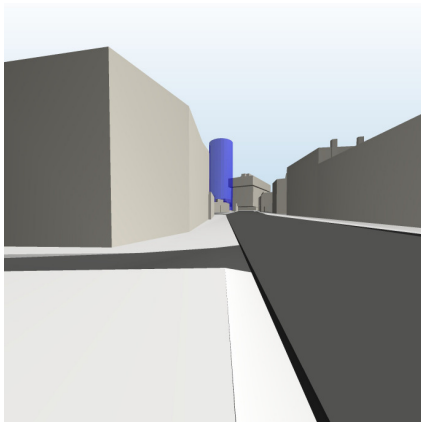
Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



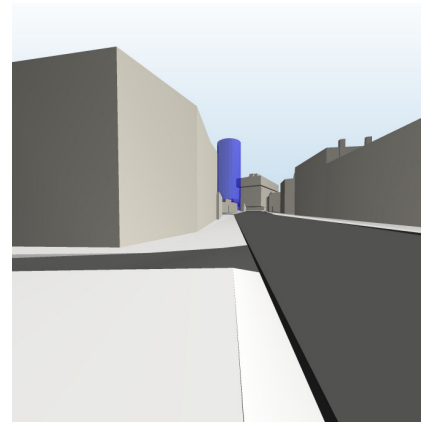
Heights tested appear taller than Palestra in this view. There is a need to consider relationship to the lower height surrounding the taller element.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road.

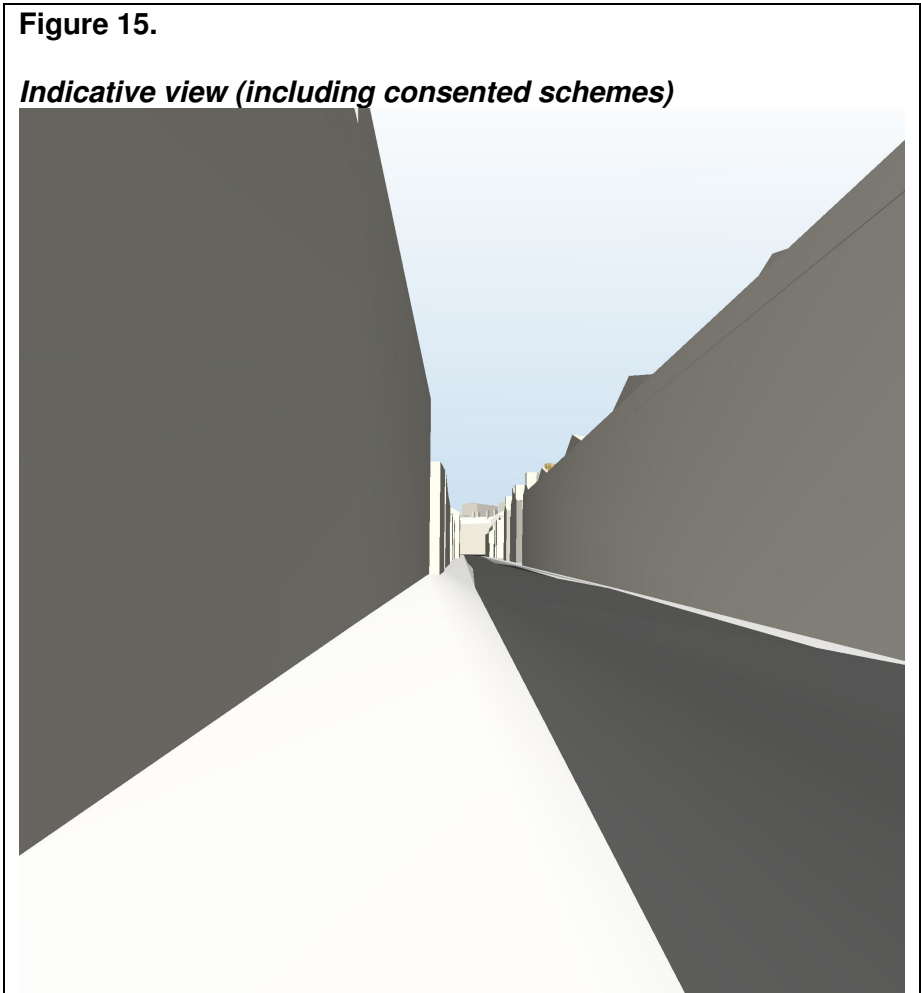
No upper limit at Northern section of Blackfriars Road



Heights tested appear taller than Palestra in this view. There is a need to consider relationship to the lower height surrounding the taller element.

View 28 Rushworth Street looking north, within the Kings Bench Conservation Area

- This is an axial view along Rushworth Street looking north within the Kings Bench Conservation Area. Each side of the view is framed by building frontages. The upper levels of the Palestra are visible above the roofline in the background of the view.
- Taller development at the Southwark tube station/Central node must consider the setting of the conservation area,



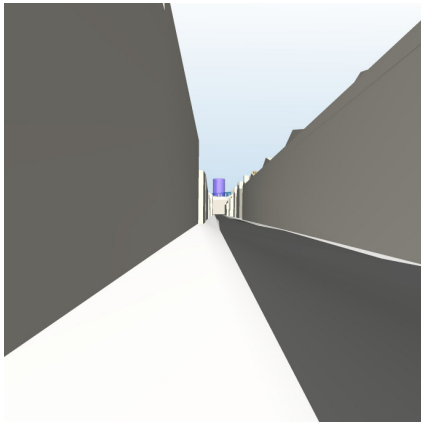
Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



Heights tested at the Southwark tube/central node appear above roofline with approx 1/3 to 1/4 of the being height visible.

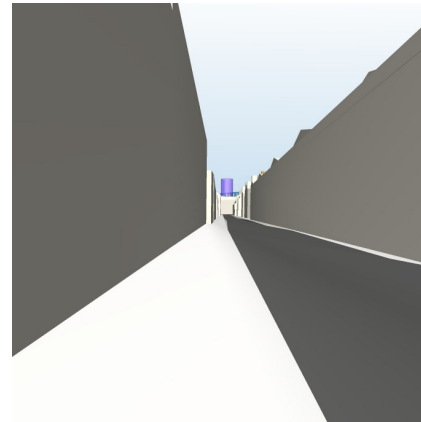
The heights tested for the northern section of the Blackfriars Road will not be visible in the view.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road

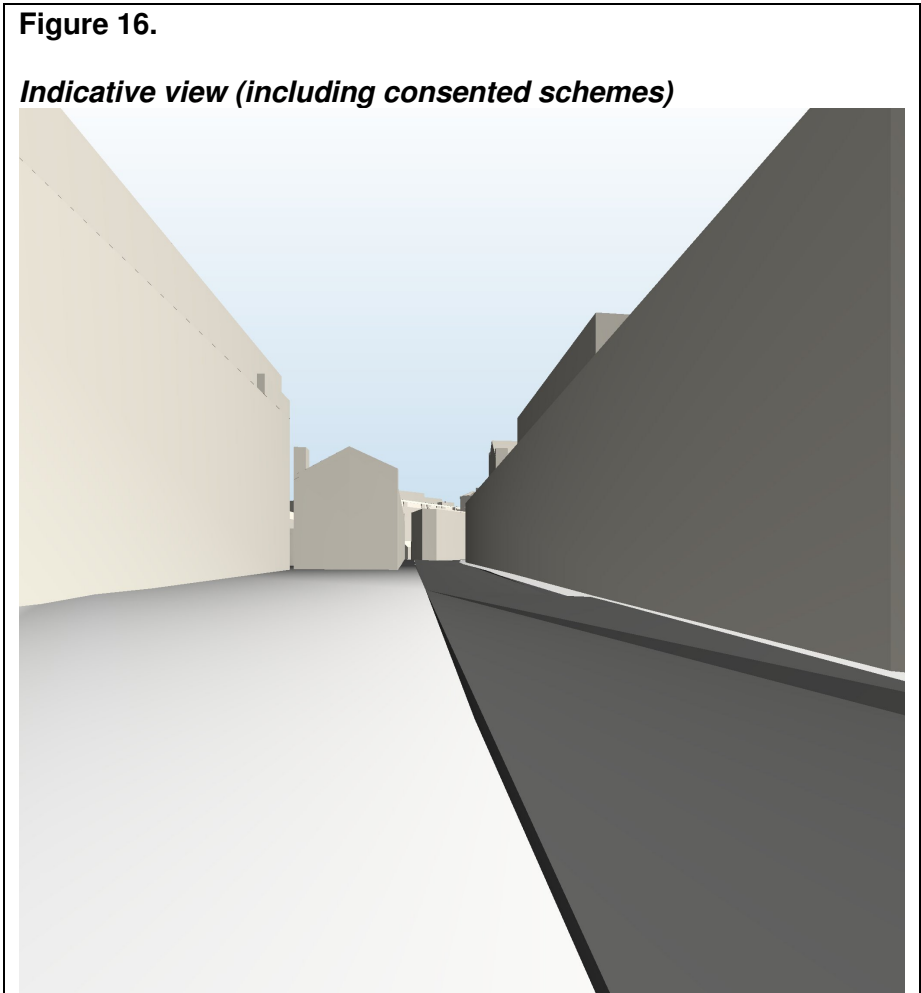


Heights tested at the Southwark tube/central node appear above roofline with approx 1/3 to 1/4 of the being height visible.

The heights tested for the northern section of the Blackfriars Road will not be visible in the view.

View 29 Valentines Place looking north

- This is an axial view along Valentine Place Street looking north within the Valentine's Place Conservation Area. Each side of the view is framed by building frontages with the eastern side of Valentines Place characterized by warehouse buildings.
- Taller development at the Southwark tube station/Central node and along the southern section of Blackfriars Road must consider the setting of the conservation area.



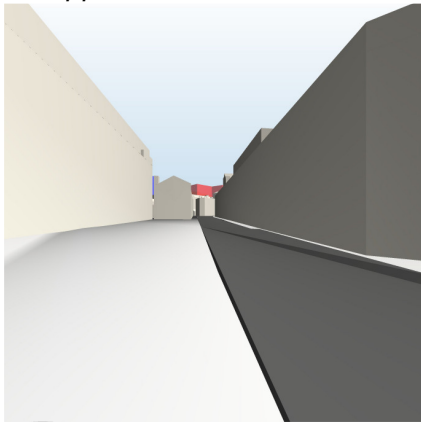
Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road

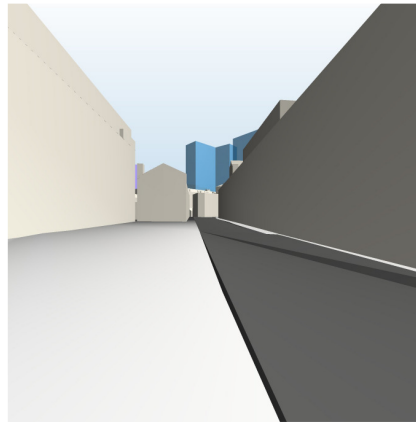


Heights on Southwark tube tested may be visible, but generally hidden behind the existing roofline. Heights tested along the southern section of Blackfriars Road will be visible above the roofline and appear broadly in context with the surrounding heights.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

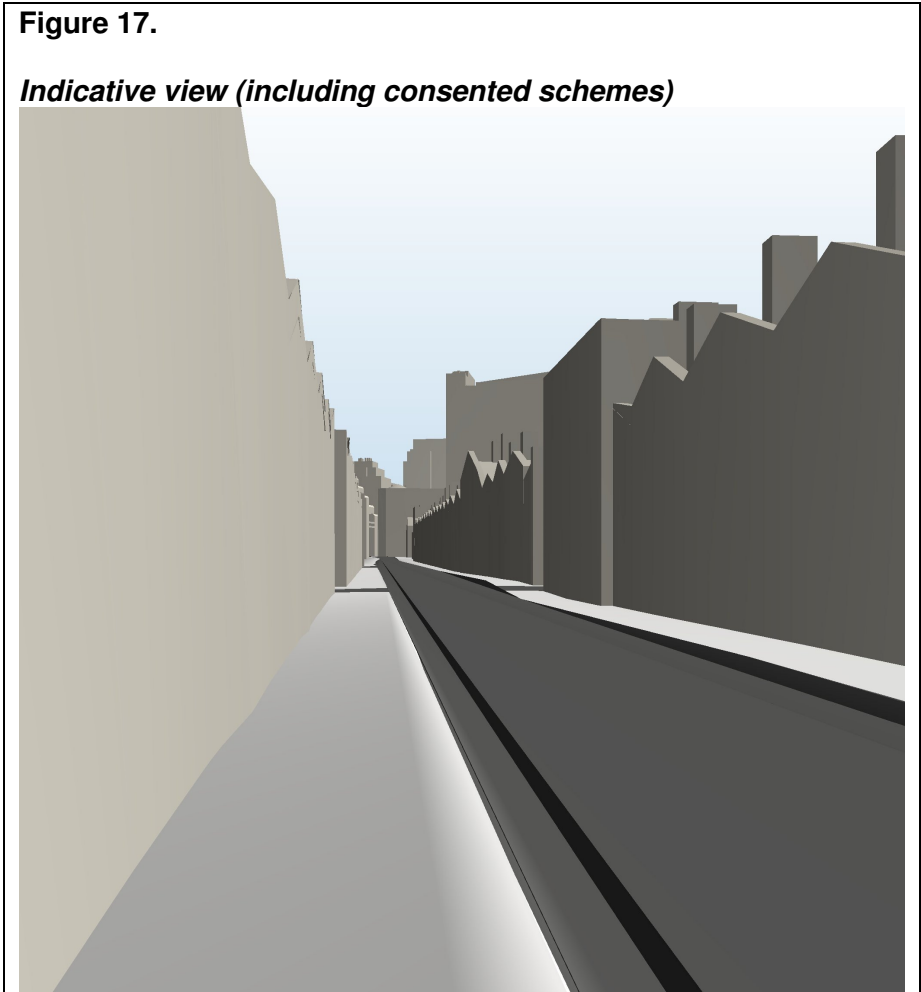
70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road. No upper limit at Northern section of Blackfriars Road



Heights on Southwark tube tested may be visible, but generally hidden behind the existing roofline. Heights tested along the southern section of Blackfriars Road will be visible above the roofline and appear out of context and overbearing with the surrounding heights.

View 31 Roupell Street, looking east

- This is an axial view along Roupell Street looking east within the Roupell Street Conservation Area. Each side of the view is framed by building frontages.
- Colombo House is visible in the background of the view above the roofline of Roupell Street.
- Taller development at the Southwark tube station/Central node and along the northern section of Blackfriars Road must consider the setting of the conservation area.



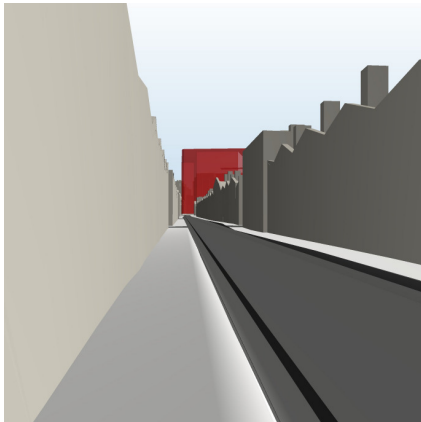
Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



The heights tested on Colombo House would be ½ visible above the roof line but are similar in impact to the existing context. However, any new proposal should consider how its flank elevations are articulated to carefully consider their relationship with the roofline and conservation area.

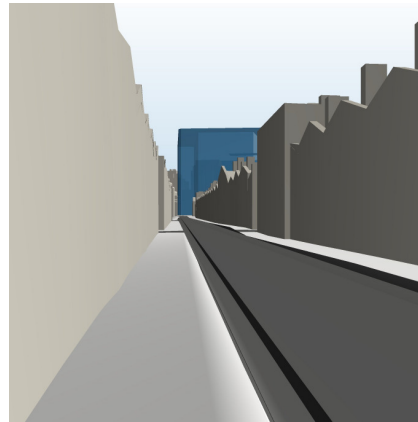
The heights tested for the northern section of the Blackfriars Road are not visible in the view.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



The heights tested on Colombo House would be ½ to 2/3 visible above the roof line but are similar in impact to the existing context. However, any new proposal should consider how its flank elevations are articulated to carefully consider their relationship with the roofline and conservation area.

The heights tested for the northern section of the Blackfriars Road are not visible in the view.

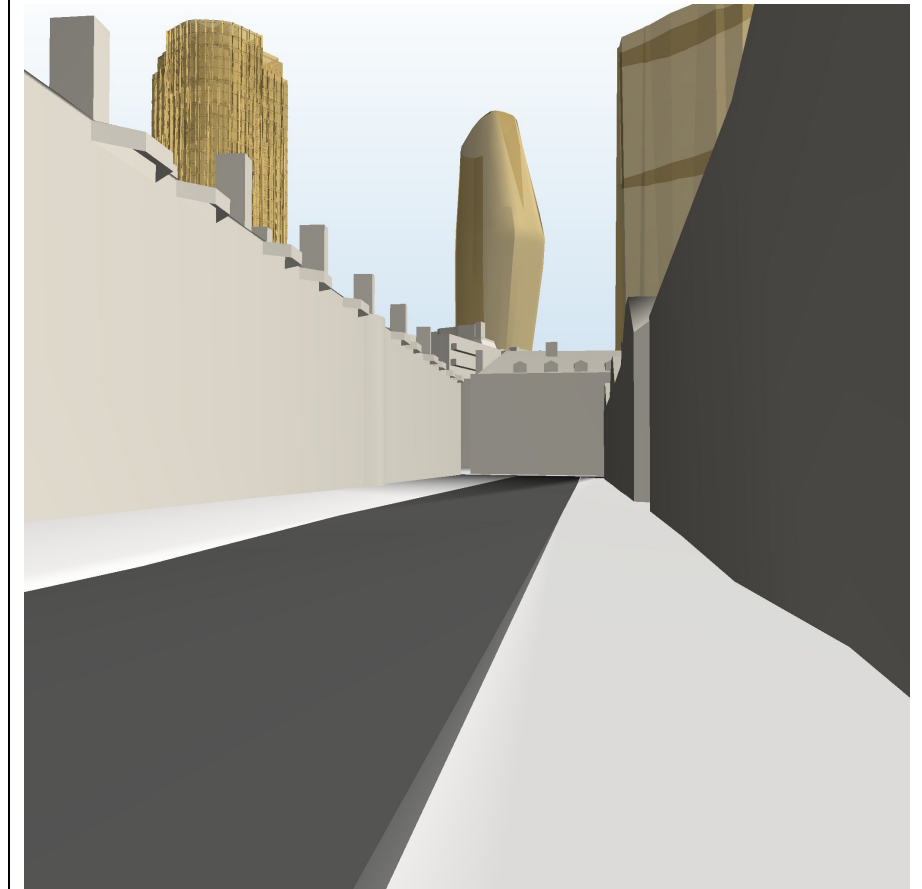
View 32 Aquinas Street, looking east

- This is an axial view along Aquinas Street looking east within the Waterloo Conservation Area. Each side of the view is framed by building frontages.
- The consented schemes at 1 Blackfriars Road, 20 Blackfriars Road, 240 Blackfriars Road and the South Bank tower extension are visible above the roofline and have a significant impact on the view.
- Taller heights at the northern section of Blackfriars Road will need to consider their relationship with the consented buildings.

Figure 18.

Indicative view (including consented schemes)

Please note that the tall buildings in this view that are pale cream in colour are schemes that have already received planning consent.

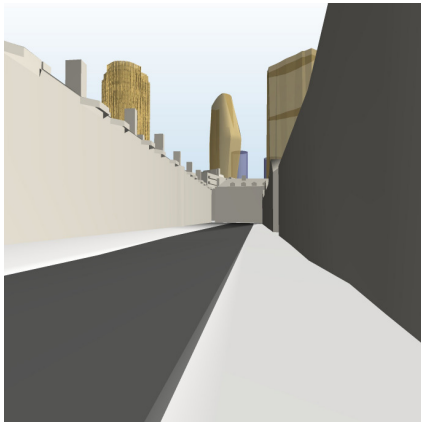


Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road. No upper limit at Northern section of Blackfriars Road



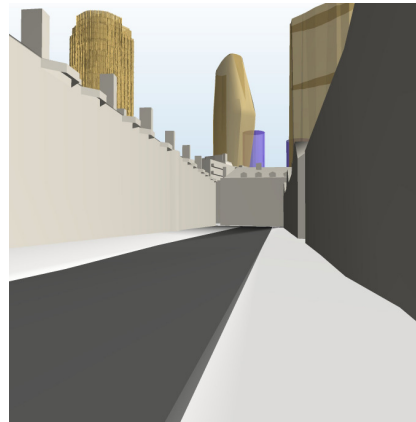
Tested heights on the Sampson and Ludgate site are approximately 1/4 visible above roofline behind existing consents.

Taller heights at the northern section of Blackfriars Road will need to consider their relationship with the consented buildings.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road. No upper limit at Northern section of Blackfriars Road



Tested heights on the Sampson and Ludgate site are approximately 1/3 visible above roofline behind existing consents.

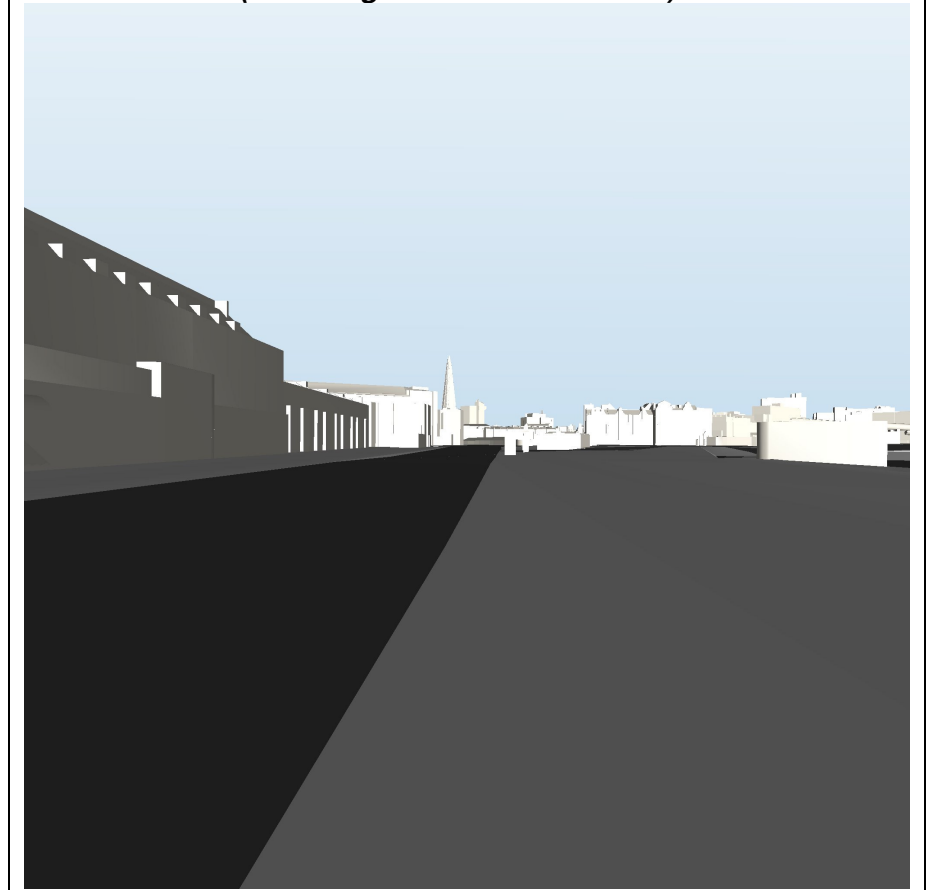
Taller heights at the northern section of Blackfriars Road will need to consider their relationship with the consented buildings.

View 35 Lambeth Road, looking east

- This is a townscape view along Lambeth Road looking east, close to the borough boundary with Lambeth. The view falls within the West Square Conservation Area with the southern side of the view opening up into the Geraldine Mary Harmsworth Park.
- St George's Circus and the Shard are visible in the background of the view.
- New tall building development which appears in the mid and background of the view of the conservation area and the setting of listed heritage assets on the northern side of Lambeth Road will need to consider the potential impact and relationship.

Figure 19.

Indicative view (including consented schemes)



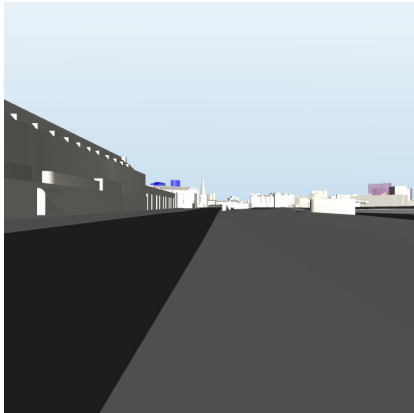
Assessment of testing options

Indicative view:

Testing option 3 / SPD Option

70m at central node, 30m along southern section of Blackfriars Road, 70m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



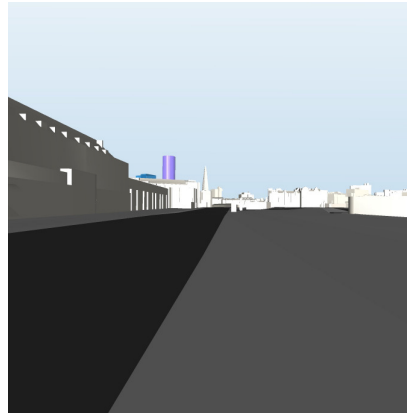
The taller element at St George's Circus would have a negligible impact on this view.

Indicative view:

Testing Option 4 / Height discounted due to negative impact

70m at central node, 56m along southern section of Blackfriars Road, 100m at St George's Circus/southern end of Blackfriars Road.

No upper limit at Northern section of Blackfriars Road



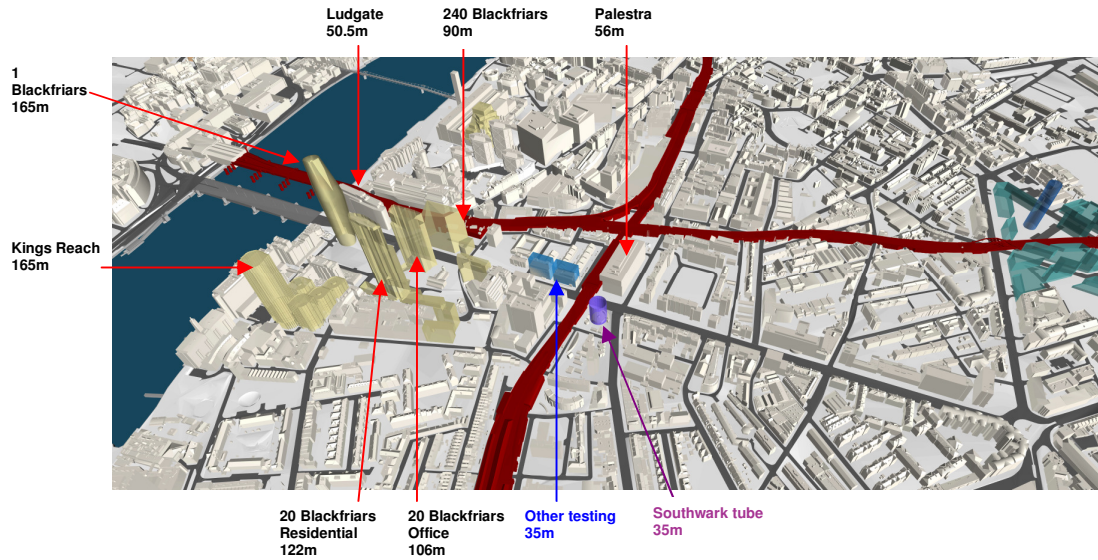
Taller heights on Erlang and McLaren House may be visible above the roofline with approx 1/2 to 1/3 of the Erlang height being visible, although mature trees may hide the building.

New tall building development will need to consider the potential impact and relationship with the conservation area and the setting of listed heritage assets. Consideration should be given to surrounding heights and nearby residential areas.

Appendix 3 : Views assessment

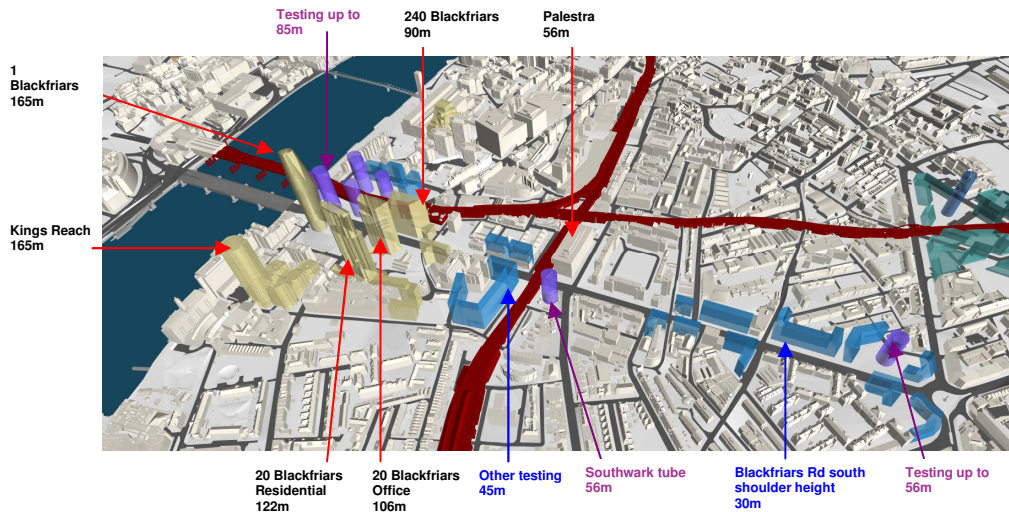
Testing option 1:

- Blackfriars Rd north - Existing and consented heights
- Blackfriars Road centre - up to 30m AOD



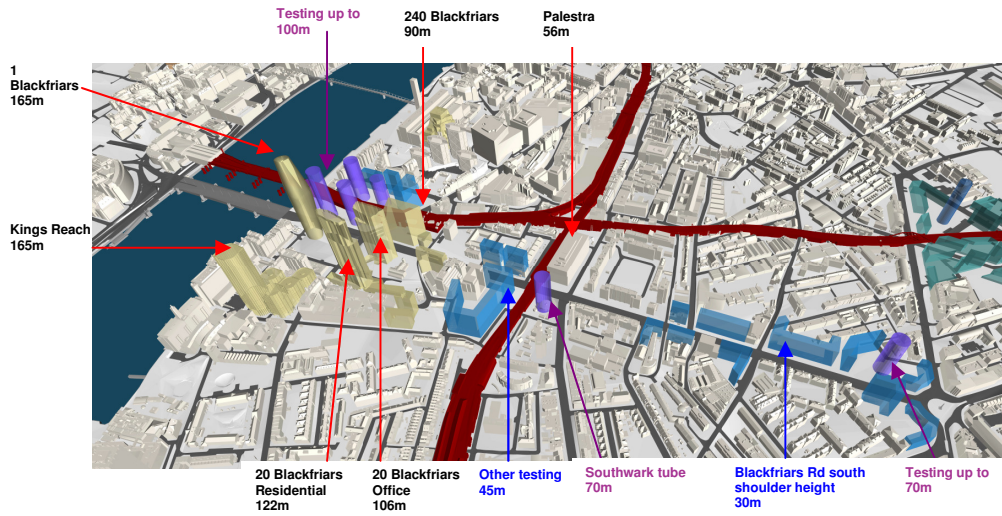
Testing option 2:

- Blackfriars Rd north - up to half height of no. 1 Blackfriars Rd (85m AOD)
- Blackfriars Rd centre & south - up to height of Palestra (56m AOD)
- Blackfriars Rd south shoulder height - up to 30m AOD



Testing option 3:

- Blackfriars Rd north - up to height of no. 20 & 240 Blackfriars Rd (100m AOD)
- Blackfriars Rd centre & south - up to height of Neo Bankside / Tate extension (70m AOD)
- Blackfriars Rd south shoulder height - up to 30m AOD



Testing option 4:

- Blackfriars Rd north and south - up to height of no. 20 & 240 Blackfriars Rd (100m AOD)
- Blackfriars Rd centre - up to height of Neo Bankside / Tate extension (70m AOD)
- Blackfriars Rd south shoulder height - up to height of Palestra 56m AOD

