

# **Matter 4: Tall Buildings**

## **Merton Local Plan Examination: Stage 2 Hearings**

### **Participant Statement on behalf of Clarion Housing Group**

September 2022

## Matter 4: Tall Buildings

Issue (i): Is the Plan's approach to tall buildings grounded in an understanding and evaluation of each area's defining characteristics, in general conformity with the London Plan, and are the Plan's policies relating to tall buildings effective?

- 1.1 During the Stage 1 hearing for Matter 13 (Tall buildings), we commented on both the Brent and Lambeth Local Plans. These were adopted after the current London Plan (LP) was adopted, and were found to be in conformity with it. The wording of the tall buildings policies included within these local plans have flexibility embedded within them.
- 1.2 We note that the Lambeth Local Plan was stated as being not relevant during the Stage 1 hearing session. This is not correct as the Lambeth Local Plan does identify locations appropriate for tall buildings within an Annex to the Local Plan. It also includes site allocations. Whilst further site allocation policies are to be developed within a subsequent Development Plan Document (DPD), part of the tall buildings policy relates to tall buildings outside the locations identified in Annex 10 or as identified as site locations i.e. on windfall sites. Its circumstances are therefore relevant to the discussion on this matter.

### Questions:

4. Policy BD2 of the Brent Local Plan has been referred to in statements and earlier hearing sessions –

a) Have the Council given any further consideration to the approach taken in that Plan?

- 1.3 This is for the Council to answer. We will comment further once the Councils Hearing Statement has been published.

b) Are the circumstances and context comparable?

- 1.4 Yes, for the reasons explained below.
- 1.5 Having regard to the Councils proposed definition of tall buildings, the nature of the evidence base prepared by London Borough of Merton (LBM) is high level and not as detailed as expected by the LP. As such we consider the policy wording should incorporate flexibility so as to not constrain development optimisation where justified via a design-led approach. In this regard, the current tall buildings policy approach is

not sufficiently justified in terms of consideration of optimising sites outside tall building clusters across the borough.

- 1.6 Tall buildings in LBM are proposed to be defined as a minimum of 21m from the ground level to the top of the uppermost storey. The Mayors draft Characterisation and Growth Strategy (CGS) London Plan guidance explains that *“for boroughs that apply a lower tall building definition than 30m in height, there are likely to be many more locations where tall buildings may be an appropriate form of development”*. The guidance explains that in such instances, the level of evidence required to scope out suitability for tall buildings would be more extensive. This would apply to LBM where the proposed tall buildings definition will be at the minimum level allowed by the London Plan (LP), and will be well below 30m.
- 1.7 LP Paragraph 3.9.2 explains that boroughs should determine and identify locations where tall buildings may be an appropriate form of development based on the areas identified for growth (following the steps identified in LP Policy D1 for identifying suitable locations for growth, and the scale of that growth). A sieving exercise is required which assesses potential visual and cumulative impacts. It is noted that the Councils evidence base, including the sieving and suitability scoping exercise is high level and has not involved 3D modelling, or townscape and visual impact analysis for areas outside tall building clusters identified.
- 1.8 It is recognised that the plan-making process presents challenges with resourcing and carrying out more detailed evidence base work. This was discussed during both the Brent and Lambeth Local Plan examinations:
- In Brent, during the examination the Council acknowledged that their evidence base was not as comprehensive as expected by the LP<sup>1</sup>. This is also acknowledged in the supporting text to the tall building policy<sup>2</sup>. The Inspectors Report<sup>3</sup> also recognised the shortcomings of the evidence base, noting that the level of sieve analysis was not as detailed as envisaged by the LP. In this regard it is noted that the tall building policy wording evolved over course of the examination to become less prescriptive and more flexible:

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<sup>1</sup> Response of Council to Matter 7 – Design, Heritage and Culture (page 3) - [https://legacy.brent.gov.uk/media/16416743/brent-lp-miq7-lb-brent-response-aug20\\_final.pdf](https://legacy.brent.gov.uk/media/16416743/brent-lp-miq7-lb-brent-response-aug20_final.pdf)

<sup>2</sup> Evidence base document reference: OTH01, Paragraph 6.1.15 - <https://www.merton.gov.uk/system/files/OTH01%20-%20Appendix%20to%20Hearing%20Statement%20from%20Quod%20on%20behalf%20of%20Criterion%20Capital%20on%20Matter%2013.pdf>

<sup>3</sup> Inspectors Report on the Examination of the Brent Local Plan (January 2022) - [https://legacy.brent.gov.uk/media/16419965/1\\_brent-lp-inspectors-report-final.pdf](https://legacy.brent.gov.uk/media/16419965/1_brent-lp-inspectors-report-final.pdf)

- 1) The definition of a tall building was ‘loosened’ to provide greater flexibility. It evolved as follows:

*“A tall building is one that is more than 6 metres above the general prevailing heights of the surrounding area or more than 30 metres in height” (as Submitted)*

*“A tall building is one that is more than 18 metres measured from ground to the floor level of the uppermost storey” (Feb 2021)*

*“A tall building is one that is more than 30 metres in height above ground level” (adopted Feb 2022).*

- 2) Supporting text<sup>2</sup> acknowledged the high level nature of the evidence and the fact that the heights specified were indicative and subject to refinement, thus allowing for a design-led approach at application stage to determine the appropriate height for development. The final wording is copied below:

*“6.1.15.... The heights identified for the Tall Buildings Zones, town centres and site allocations are based on a high level of analysis, rather than in many cases considering a detailed building design. They indicate the heights likely to be generally acceptable to the council. This does not mean that all buildings up to these heights are automatically acceptable. Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location. There might however also be circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable.”*

- 3) The policies map was modified to delete reference to ‘core’, ‘pinnacle’ and ‘edge zones’ within the Tall Building Zones, thus providing flexibility to allow for a design-led approach at application stage to determine appropriate heights. This additional categorisation on the Policies Map was found to be neither justified by the evidence base, reflective of the policy approach set out at Policy BD2 or supported by the LP.
- In Lambeth, the Council acknowledged in their evidence<sup>4</sup> that limited resources did not allow for an exhaustive borough-wide survey to identify and test every potential location; and that past experience has shown that acceptable tall building schemes do occasionally come forward on windfall sites outside of locations identified

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<sup>4</sup> Topic Paper November 2019 - [https://beta.lambeth.gov.uk/sites/default/files/2021-06/pl\\_Topic\\_Paper\\_8\\_Tall\\_Buildings\\_2019-accessible.pdf](https://beta.lambeth.gov.uk/sites/default/files/2021-06/pl_Topic_Paper_8_Tall_Buildings_2019-accessible.pdf)

through the plan-led process. The high level nature of their analysis is also discussed in the supporting text to the tall building policy. Inclusive of the reference to tall buildings outside of identified locations within the policy (Policy Q26 Part B<sup>5</sup>), and acknowledgement within the supporting text that the heights stated are indicative (paragraph 10.129), the Inspectors found the policy wording to be positive prepared and robust, and that it struck a sustainable balance.

- 1.9 The NPPF explains (paragraph 31) that policies should be underpinned by relevant and up-to-date evidence that should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. Acknowledging it would not be possible to carry out detailed site-specific analysis for every location across the borough LBM's evidence base is considered to be generally proportionate for the plan-making process (as was also the case in Brent and Lambeth); however, it does not contain sufficient detail to justify the proposed drafting of the tall buildings policy in the context of the low height definition proposed. Modifications are therefore considered necessary to make the policy less prescriptive and more flexible in a similar way to that which has been accepted elsewhere.
- 1.10 LBM draft Policy D12.6 states that tall buildings will only be acceptable in specified locations, thus implying that they would not be acceptable in other locations. This prescriptive approach is not sustainable as it would constrain buildings over 6 storeys from being considered in other parts of the borough, where justified via a design-led approach to optimisation of land. This risks constraining development potential such that it would not make effective use of land, thus conflicting with the requirements of the NPPF and LP. The LP recognises that that all parts of London will need to embrace and manage change. In outer London, the suburban pattern of development is noted as having significant potential for intensification (LP Paragraph 2.0.3); therefore, the new Local Plan should embrace change and should ensure that it does not constrain sites from being appropriately intensified. The currently drafted policy is overly restrictive.
- 1.11 The current approach is not considered to be sufficiently justified because:
- The LBM evidence base is high level having regard to the proposed height definition, and therefore in respect of areas outside of tall building locations it is not as detailed as expected in the LP and supporting guidance. The sieving and scoping for suitability exercise carried out is high level and has not involved 3D modelling, or townscape and visual impact analysis for site locations outside designated tall building locations. By setting a the lowest height threshold for tall

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<sup>5</sup> A copy of Policy Q26, its supporting text and Annex is included at **Appendix 1**.

buildings, a more detailed evidence base is required as there may be “many more locations” that could be suited to buildings above 6 storeys.

- The draft CGS guidance confirms that area assessment carried out in line with LP Policy D1 form a key part of the evidence base for local plans. The Merton Character Study<sup>6</sup> (MCS) is therefore a key evidence base document. The LBM Hearing Statement for Stage 1 Matter 13 confirms that the MCS illustrates a consistent average height across all wards of 2.1 - 2.7 storeys. This has been used to justify the definition of tall buildings. However, this high-level approach does not acknowledge that there are taller buildings (existing and proposed over 6 storeys) in Merton and there is a need to consider growth and intensification when optimising the potential of sites. As per the LP, LBM will need to embrace change in order to accommodate the growth required (as is also evident from the significantly increased housing targets that Merton is required to meet as a minimum).
- It is noted that the MCS also identifies other typologies in the borough (not just 2-3 storey houses). These are spread across the borough. The study demonstrates:
  - A mix of typologies across the borough (refer to page 28-35 of MCS), including:
    - Non residential led typologies Linear Corridors. These are noted as having a typical storey height of 2-6 storeys (page 30)
    - Residential led typologies – perimeter blocks, including Modern Urban. These are noted as having a typical storey height of 4-6 storeys (page 32)
    - Residential led typologies – non-perimeter blocks, including Mansion Blocks. These are noted as having a typical storey height of 3-5 storey. Also Linear Blocks which are noted as having a typical storey height of 3-8 storeys

Noting the above, there may be opportunities to optimise these sites or those within the vicinity and this could involve design testing to include tall buildings (i.e. buildings over 6 storeys).

  - Opportunities for context-led growth, including potential for high density taller buildings, including in:
    - Town centres (refer to page 120-123 of MCS)
    - Linear – Corridors & Parades, Non-residential Linear typologies which are sustainable locations for growth and suitable for high

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<sup>6</sup> Evidence base document reference: 12D1 - [https://www.merton.gov.uk/system/files?file=20037\\_final20merton20character20study\\_high20res\\_210728.pdf](https://www.merton.gov.uk/system/files?file=20037_final20merton20character20study_high20res_210728.pdf)

density development, which can also contribute to re-imagining (refer to page 124-126 of MCS)

- Campus, Non-residential campus where the scale of buildings might step up where appropriate (refer to page 129-131 of MCS)

Noting the above, the MCS identifies opportunities for growth in other locations which could include design testing to include tall buildings (i.e. buildings over 6 storeys).

- The maps, diagrams and precedent images included in the MCS analysis demonstrates existing buildings and potential typologies which could mean that there may be potential for tall buildings to be considered as part of design-led optimisation.
- Furthermore, when considering the suitability of the borough for tall buildings, the heat map at page 139 demonstrates that there are many locations which are potentially suitable for tall building development, with the areas that are potentially sensitive to tall building development being more limited. The level of sieve analysis undertaken is high level and there is no assessment of harm or no granular analysis of specific areas or sites outside tall building locations, in particular.
- The MCS also identifies opportunities for intensification along minor and major corridors which traverse the borough. The corridors provide opportunities to rethink and improve the environments along the key routes through development that sensitively increases the scale, alongside public realm enhancement (page 42). These areas could therefore also present opportunities for optimisation which may include tall buildings.
- The Merton Tall Buildings Presentation to the GLA<sup>7</sup> also acknowledges that “*on larger sites, a masterplanned approach may be suitable and will be appraised case by case*”.

- 1.12 Taken together, the evidence base whilst generally proportionate for plan-making, does not sufficiently justify a prescriptive policy approach that tightly defines tall buildings locations in the context of the lower tall building definition. Flexibility should be embedded within the policy to allow for the consideration of tall buildings on sites outside of those listed in the policy, where there is robust design-led justification. This approach was found to accord with national and LP policies on tall buildings whilst striking a sustainable balance in relation to the Lambeth Local Plan (see Appendix 1) which was adopted in September 2021; further details of which are provided below.

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<sup>7</sup> Evidence base document reference 12D15 -

<https://www.merton.gov.uk/system/files/12D15%20Merton%27s%20Tall%20Buildings%20presentation%20to%20GLA%202021.pdf>



- Lambeth Plan Policy Q26 outlines in Part A the locations identified as appropriate for tall buildings with reference to Annex A.

- Part B goes onto state:

*“Outside the locations identified in Annex 10 or as identified in site allocations, there is no presumption in favour of tall building development. Should tall buildings be proposed outside the locations identified in Annex 10 or as identified in site allocations, the applicant will be required to provide a clear and convincing justification and demonstrate the appropriateness of the site for a tall building having regard to the impact on heritage assets, the form, proportion, composition, scale and character of the immediate buildings and the character of the local area (including urban grain and public realm/landscape features) and ensure points (a) (i) - (vi) are met. In addition:*

- proposals for tall buildings will only be considered acceptable in established low rise residential neighbourhoods where they are part of a comprehensive scheme which integrates well with the locality.”

- Part A (i)-(vi) (referenced in part B) requires such proposals to not adversely impact on strategic or local views; achieve design excellence (form, proportion, silhouette, detailing and materials etc.); make a positive contribution to public realm and townscape including at street level, whether individually or as part of a group; where proposed near existing tall building groups, to follow the established principles of group composition such as noticeable stepping down in height around cluster edges; adequately address the criteria in LP Policy D9C in terms of acceptable visual, environmental and functional impacts; and demonstrate that the site can accommodate the uses and quantum of development proposed in terms of meeting acceptable standards of amenity, access, transport accessibility and servicing.
- Supporting text states (paragraph 10.130): *“From time to time windfall sites may provide the opportunity for tall building development in locations that have not been anticipated through the planned process. Part (b) of this policy is intended to deal with these situations. It should be recognised that outside the Annex 10 locations there is not a presumption in support of tall development and therefore, in these instances, the onus will be upon the applicant to fully meet all of the policy tests. Where it is proposed to bring forward proposals under part (b) the verified technical evidence supporting that approach and the proposal should be independently reviewed by the DRP at master-planning stage and again at detailed design stage during the pre-application process...”*



c) Would a similar approach in the Merton Local Plan be justified by the evidence base and would it achieve general conformity with the London Plan?

1.13 A less prescriptive approach to the policy wording, with embedded flexibility, would conform with the LP as confirmed during the local plan examinations discussed above. It would ensure that the policy approach is justified, noting the draft wording is not currently sufficiently justified in terms of optimisation of sites outside tall building locations; and importantly it would strike a sustainable balance in ensuring that opportunities to optimise site potential can be appropriately taken.

1.14 In relation to the specific issues raised within our Statement, the following modifications are strongly recommended to ensure soundness:

Amend part 1. Tall buildings ~~are only acceptable in~~ will be directed to the following locations:

Add part 4. Outside the locations identified part 1 of this policy, there is no presumption in favour of tall building development. Should tall buildings be proposed outside the locations identified in part 1, the applicant will be required to provide a clear and convincing justification and demonstrate the appropriateness of the site for a tall building having regard to the form, proportion, composition, scale and character of the immediate buildings and the character of the local area (including urban grain and public realm/landscape features), the impact on heritage assets, and ensure parts 2 and 3 of the policy are considered.

Add supporting text From time to time windfall sites may provide the opportunity for tall building development in locations that have not been anticipated through the planned process. Part (b) of this policy is intended to deal with these situations. It should be recognised that outside the identified locations there is not a presumption in support of tall development and therefore, in these instances, the onus will be upon the applicant to fully meet all of the policy tests.

d) If taken forward in this Plan would a similar approach assist in the objective of ensuring that the Plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, in a way that makes as much use as possible of previously- developed or 'brownfield' land (per paragraph 119 of the Framework)?

- 1.15 Embedding flexibility in the tall building policy approach would ensure that the tall buildings policy does not constrain previously developed or brownfield sites from being optimised, in accordance with the LP and NPPF. This is essential noting the limited land availability and the significant need for more housing acknowledged in the draft Local Plan.

## Appendix 1 – Extracts from Lambeth Local Plan

### Lambeth Local Plan 2020–2035

Adopted September 2021



  
Lambeth

  
savills

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## Section 11: **Places and Neighbourhoods** **228**

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**Policy Q26 Tall buildings**

The following definitions of building heights are defined for Lambeth:

	Low rise	Mid rise	Tall (this policy applies to these buildings)
South Lambeth (south of the South Circular Road)	Up to 9m	Between 9m and 25m	Above 25m
Middle and north Lambeth (north of the South Circular Road)	Up to 15m	Between 15m and 45m	Above 45m

- A. Having particular regard to the international obligation to preserve the OUV of the Westminster World Heritage Site and taking into account the desirability of preserving the settings of heritage assets, proposals for tall buildings will be supported where they are in locations identified as appropriate for tall buildings in Annex 10 and where:
- will not adversely impact on strategic or local views;
  - design excellence is achieved (form, proportion, silhouette, detailing and materials etc.);
  - the proposal makes a positive contribution to public realm and townscape including at street level, whether individually or as part of a group;
  - where proposed near existing tall building groups, proposals should follow the established principles of group composition such as noticeable stepping down in height around cluster edges;
  - the proposal adequately addresses the criteria in London Plan policy D9C in terms of acceptable visual, environmental and functional impacts including microclimate, wind turbulence, noise, daylight and sunlight, reflective glare, aviation (including the safeguarded zones around Heathrow Airport, London City Airport, Battersea Heliport and the helipad at Kings' College Hospital), navigation and electronic communication or broadcast interference; and
  - it can be shown that the site can accommodate the uses and quantum of development proposed in terms of meeting acceptable standards of amenity, access, transport accessibility and servicing.
- B. Outside the locations identified in Annex 10 or as identified in site allocations, there is no presumption in favour of tall building development. Should tall buildings be proposed outside the locations identified in Annex 10 or as identified in site allocations, the applicant will be required



to provide a clear and convincing justification and demonstrate the appropriateness of the site for a tall building having regard to the impact on heritage assets, the form, proportion, composition, scale and character of the immediate buildings and the character of the local area (including urban grain and public realm/landscape features) and ensure points (a) (i) - (vi) are met. In addition:

- i. proposals for tall buildings will only be considered acceptable in established low rise residential neighbourhoods where they are part of a comprehensive scheme which integrates well with the locality.
- C. Where existing tall buildings are identified (through CA appraisals, characterisations and other similar studies) as negative elements in strategic or local views, heritage setting or townscape terms etc., the council will encourage and support proposals which lessen the adverse impact through redevelopment, height reduction or re-cladding.

### Supporting text

10.128 In the right locations tall buildings can make important contributions towards delivering new homes, economic growth and regeneration. The locations identified as appropriate for tall buildings in Annex 10 are situated in those parts of Vauxhall and Waterloo that are Opportunity Areas and in Brixton town centre. Place specific policies for these locations are provided in Section 11: Places and Neighbourhoods, along with a small number of retained policies. The council is also preparing a Site Allocations DPD which may identify sites suitable for tall building development.

10.129 High level visual impact analysis, taking into account heritage asset settings, views and, where relevant, existing guidance on cluster formation and rudimentary 3D modelling, has been used to identify the general heights shown on the Annex 10 maps. See Topic Paper 8 Tall Buildings and the supporting evidence base documents listed in Annex 1. Applicants should use this information to inform their proposals. Given the high level nature of the analysis that informed them, these heights should be considered indicative as careful siting and massing informed by detailed site specific analysis may show greater heights can be achieved without harm. Where it is proposed to exceed the Annex 10 heights the council will expect the verified technical evidence supporting that approach and the proposed massing to be subject to review from Lambeth's independent Design Review Panel (DRP) at master-planning stage and again when a detailed proposal has been developed. Applicants should also seek pre-application advice from Historic England.

10.130 From time to time windfall sites may provide the opportunity for tall building development in locations that have not been anticipated through the planned process. Part (b) of this policy is intended to deal with these situations. It should be recognised that outside the Annex 10 locations there is not a presumption in support of tall development and therefore, in these instances, the onus will be upon the applicant to fully meet all of the policy tests. Where

it is proposed to bring forward proposals under part (b) the verified technical evidence supporting that approach and the proposal should be independently reviewed by the DRP at master-planning stage and again at detailed design stage during the pre-application process. The Design Code SPD provides further guidance on heritage impact assessments. Applicants will also be required to seek Historic England's pre-application advice.

- 10.131 All proposals for tall buildings should be accompanied by a detailed urban design assessment including accurate information on the townscape impact assessment. This should include a map showing the Zone of Theoretical Visibility (ZTV) of the proposal, verified digital modelling showing the impact on its immediate locality, on local and strategic views; and on any affected heritage asset settings. Any digital models submitted for assessment should be in a VUCity compatible format. Important views from within adjoining boroughs should also be included in any assessment. Historic England Advice Note 4 - Tall Buildings (2015) should also be used to inform the development and assessment of tall building proposals.
- 10.132 The safeguarded area around the Battersea Heliport is in place to ensure its operation is not inhibited by development. The safeguarded area is marked on the Local Plan policies map. In accordance with ODPM Circular 01/2003 (as updated), certain applications within that area will be subject to consultation with the Civil Aviation Authority and the Heliport operator. Restrictions may affect building height and design, or for development that might create a bird hazard (impacting on helicopter safety).
- 10.133 Development which results in canyon-like environments due to tall buildings being in uncomfortably close proximity, will not be permitted on design and amenity grounds. Given the hilly character of some parts of South Lambeth the influence of the topography on the visual and environmental impact of the proposal will be a consideration in assessing schemes.
- 10.134 Low rise and mid rise proposals will be assessed against Local Plan policies Q6 and Q7. See also Local Plan policies Q19 and Q25 in relation to the Westminster World Heritage Site and views.

#### Policy Q27 Basement development

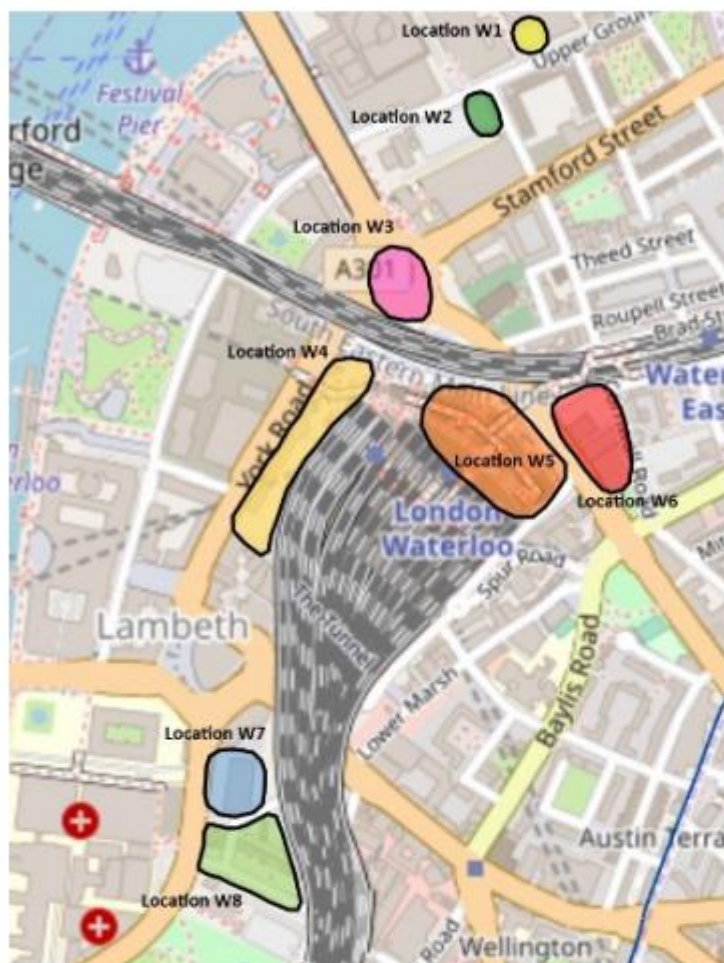
- D. The council will support basement and associated development (light wells, basement area excavation, access ramps etc.) where applicants can demonstrate that no unacceptable impacts will result to:
- i. subterranean ground water flow (ground water);
  - ii. slope stability (land stability);
  - iii. surface flow and flooding (see also Local Plan policy EN5 and Annex 4);
  - iv. the ability of trees and soft landscaping (existing and proposed) to thrive without irrigation;



## Annex 10: **Maps showing locations appropriate for tall buildings – Waterloo, Vauxhall and Brixton**

These maps relate to Local Plan policy Q26: Tall buildings. See Topic Paper 8 for an explanation of the methodology used to identify these locations.

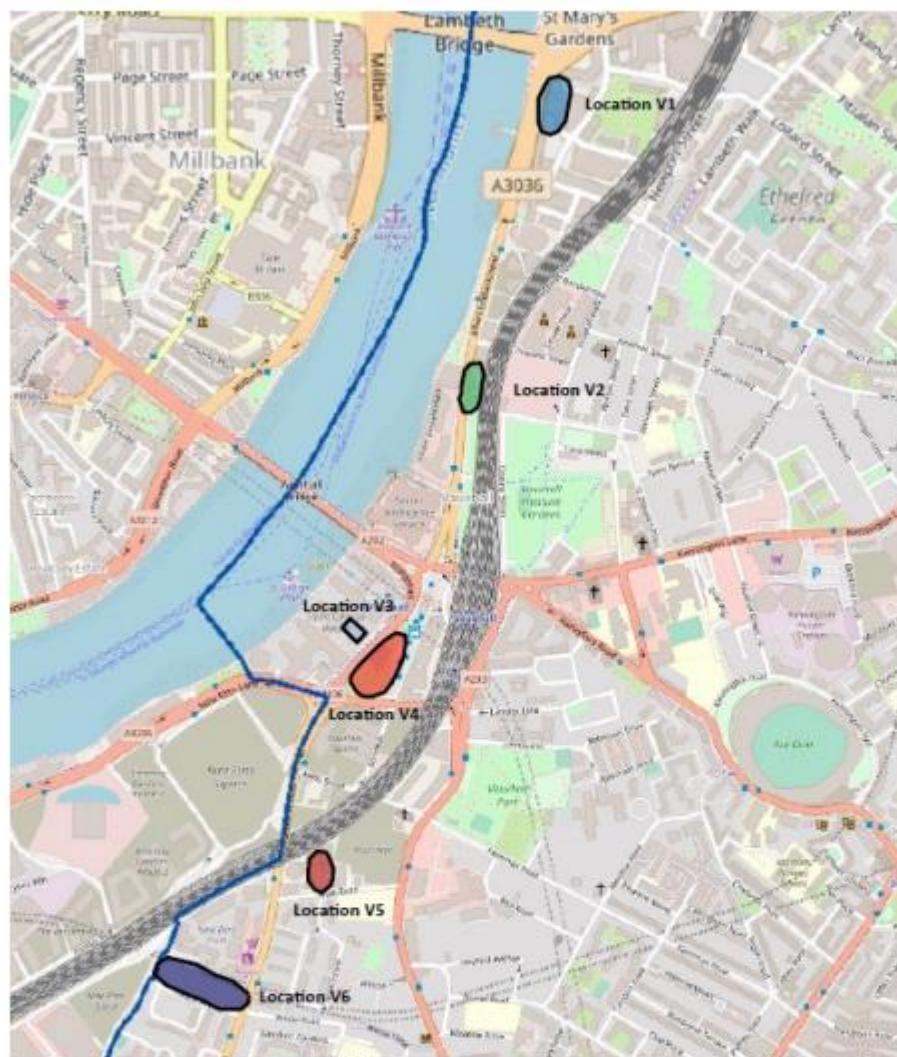
### Waterloo locations appropriate for tall buildings



#### General building heights

Location W1	Former ITV tower	100m AOD point block
Location W2	Doon St / Upper Ground	110m AOD point block
Location W3	Waterloo Roundabout	130m AOD point block
Location W4	York Road / Leake St	125m AOD (N) Up to 55m AOD (S)
Location W5	Waterloo Station	70m AOD well spaced for good townscape
Location W6	Waterloo Road / Cornwall Road	70m AOD stepping down to S
Location W7	Lambeth Palace Rd / Upper Marsh	60m AOD
Location W8	Royal St / Upper Marsh	50m AOD well spaced for good townscape

### Vauxhall locations appropriate for tall buildings



#### General building heights

Location V1	4 - 6 Albert Embankment	90m AOD
Location V2	36 – 46 Albert Embankment	90m AOD
Location V3	10 Wandsworth Road	150m AOD
Location V4	Wandsworth Road / Parry St / Bondway	150m AOD
Location V5	12 – 20 Wyvil Road	130m AOD
Location V6	Pascal Street	100m AOD



**Brixton locations appropriate for tall buildings**



General building heights		
Location B1	International House	65m AOD point block
Location B2	Former Canterbury Arms / Pop Brixton	90m AOD

A development of varied building heights ranging from 15m AOD to 30m AOD to 65m AOD ensuring that the tall elements are arranged to optimise daylight and sunlight, ensure no over-bearing impacts and be sympathetic to the scale and form of surrounding buildings especially in relation to the character and appearance (inc, setting) of the Brixton Conservation Area.