planning report PDU/2246/02

4 November 2008

Former General Lying-in Hospital
in the London Borough of Lambeth
planning application no. 09/02752/FUL

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<th>Strategic planning application stage II referral (new powers)</th>
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<th>Strategic issues</th>
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<td>Lambeth Council has resolved to refuse permission for this application. The Mayor must consider whether the application warrants a direction to take over determination of the application under Article 7 of the Mayor of London Order 2008. Having regard to the Council’s draft decision notice there are no sound planning reasons for the Mayor to intervene in this particular case and therefore no basis to issue a direction under Article 7 of the Order 2008.</td>
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<th>Recommendation</th>
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<td>That Lambeth Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct that he is to be the local planning authority.</td>
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<th>Context</th>
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| On 19 August 2008 the Mayor of London received documents from Lambeth Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under Category 1C of the Schedule of the Order 2008, “Development which comprises or includes the erection of a building more than 30 metres high and outside the City of London”.

On 23 September the Mayor considered planning report PDU/2246/01, and subsequently advised Lambeth Council that the application did not comply with the London Plan, for the reasons set out in paragraph 65 of the above-mentioned report, but that the possible remedies set out in paragraph 67 of that report could address these deficiencies. In addition, the Mayor did not agree with that section of the report relating to urban design as set out in paragraphs 16 |
to 22 of the report. The Mayor raised concerns about the relationship between the proposed towers and the adjacent listed building. In particular he considered that the height, bulk, massing and choice of materials would harm the setting of the listed building. In that respect the proposal did not comply with policies 4B.10 and 4B.11 of the London Plan, but that a reconsideration of the choice of materials and a reduction in the height, mass and bulk of the building could remedy the deficiencies.

2 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. On 27 October 2008 Lambeth Council decided that it was minded to refuse planning permission for the revised application, and on 28 October 2008 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor has until 10 November 2008 to notify the Council of his decision and to issue any direction.

3 The decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk.

4 The Council’s draft decision notice includes the following seven reasons for refusal:

I. The proposed development, by virtue of its height, bulk, scale and massing, would appear over dominant and overbearing from the 11th floor residential property to the north on York Road, which would result in an un-neighbourly and unacceptable sense of enclosure to the detriment of the residential amenities of these occupiers. As such the proposal is contrary to Policy 33 of the Unitary Development Plan (2007).

II. Insufficient information has been submitted to enable the Local Planning Authority to be satisfied that the scheme would not cause any unacceptable loss of sunlight and daylight to the surrounding residential properties. As such the proposal is contrary to the provisions of Policies 33 and 40 of the Unitary Development Plan (2007).

III. Inadequate information submitted to enable the Local Planning Authority to be satisfied that the scheme would not impact upon designated views. As such the proposal is contrary to the provisions of UDP Policies 40 and 41 of the Unitary Development Plan (2007).

IV. Based upon the documentation submitted with the application, the Local Planning Authority is unable to satisfactorily determine whether the proposed development would be able to offset at least 10% predicted CO² emissions through the use of on site renewable energy generation. As such the application is contrary to the provisions of UDP Policy 34 (2007).

V. Inadequate information was submitted regarding transport issues (including servicing strategies, and on site disabled parking) to allow the Local Planning Authority to assess whether the application site would be, or could be rendered, suitable for the use proposed without detrimental impact to highway and pedestrian safety, on street parking stress or to the servicing demands of the adjacent site. As such, the proposal is contrary to Policies 9 and 14 of the Unitary Development Plan (2007).

VI. The proposed replacement structure, by means of its height, bulk and scale and design, would harm the setting and special character of the adjacent Grade II Listed General Lying-In Hospital. As such the proposal is contrary to the provisions of Policies 33, 40 and 46 of the Unitary Development Plan (2007).

VII. The proposed internal works to the General Lying-In Hospital, involving the loss of the staircases, the demolition of walls and the sub-division of spaces within the listed building
would harm the special interest and character of the Listed Building. As such, the proposal is contrary to the provisions of Policy 46 of the Unitary Development Plan (2007).

**Article 7: Direction that the Mayor is to be the local planning authority**

**Policy test guidance GOL Circular 1/2008**

5 The initial policy test regarding the Mayor’s power to take over and determine applications referred under parts 1 and 2 of the schedule to the Order is a decision about who should have jurisdiction over the application rather than whether planning permission should ultimately be granted or refused.

6 The policy test consists of the following three parts, all of which must be met in order for the Mayor to take over the application:

   a) significant impact on the implementation of the London Plan;
   
   b) significant effects on one or more borough; and
   
   c) sound planning reasons for his intervention.

7 Parts (a) and (b) of the test identify the impact an application would have on the Mayor’s policies and the geographical extent of the impact, whilst part (c) deals with the reasons for the Mayor’s intervention, having regard to the Council’s draft decision on the application. These tests are intended to ensure that the Mayor can only intervene in the most important cases.

8 This report considers the extent to which the policy tests under Article 7(1) apply in this case and whether, therefore, the Mayor should direct that he is to be the local planning authority and apply the tests set out under Article 7(3) of the Order 2008.

**Policy test 7(1)(c): Sound planning reasons for intervening**

9 Notwithstanding parts a) and b), part (c) of the policy test is whether the Mayor considers there to be sound planning reasons to intervene. Having regard to the details of the proposal and the Council’s draft reasons for refusal, together with the outstanding issues from stage one described in paragraphs twelve to nineteen below, there are no sound planning reasons to intervene in this case.

10 In order for the Mayor to issue a direction that he is to be the local planning authority, all relevant policy tests must be met. Given policy test (c) has not been met, there is no basis to issue a direction under Article 7.

11 Notwithstanding the above, should the scheme be considered at appeal or a revised application submitted the applicant should have regard to the following matters considered below.

**Urban design**

12 The Mayor has expressed concerns about the relationship between the proposed towers and the adjacent listed building. In particular he considers that the height, bulk, massing and choice of materials harm the setting of the listed building. In that respect the proposal does not comply with policies 4B.10 and 4B.11. These deficiencies could be remedied by a reconsideration of the choice of materials and a reduction in the height, mass and bulk of the building. This issue remains outstanding.

**Designated views**
No information had been provided to allow officers to evaluate potential impacts on designated views, such as those along the Thames or local views from the Palace of Westminster World Heritage Site. As such it was not possible to assess whether the scheme complies with London Plan policies 4B.16-18. An assessment of these views would be required to assess potential impacts. This issue remains outstanding.

**Inclusive design and access**

Given the shortage of wheelchair accessible hotel bedrooms in London, more than 5% of all guest rooms should be fully wheelchair accessible or easily adaptable if required. The provision of wheelchair accessible rooms would be expected to be secured by condition.

It remains unclear where taxi pickup/drop-off for the development would be accommodated as York Road is a very busy thoroughfare. If it is intended to be at the rear servicing entrance, the applicant should demonstrate how disabled guests could access the reception area after being dropped off at the hotel. This issue remains outstanding.

**Sustainable design and construction**

The applicant did not adequately demonstrate compliance with the essential standards within the London Plan Sustainable Design and Construction SPG, and relevant London Plan Policies, particularly 4A.3, 4A.11, 4A.14 and 4A.16. This issue remains outstanding.

**Energy**

The applicant incorrectly modelled the predicted carbon dioxide emissions for the development, and the information submitted on energy efficiency measures, the approach to heating and cooling, potential for connection to energy networks, and the proposed renewable energy strategy is incorrect or insufficient. This information has not been provided by the applicant and therefore this issue remains outstanding.

**Transport for London**

When the application was considered previously, the arrangements proposed for taxi and coach pickup and drop-off were considered unsatisfactory, and the scheme did not provide any blue badge parking. No additional information has been received. As such the proposal remains contrary to London Plan policies 3C.4, 3C.20 and 3C.23. Further information was also required in relation to the servicing strategy in order to comply with London Plan policy 3C.25. No additional information has been received. This issue therefore also remains outstanding.

**London Development Agency**

The LDA continues to support this application in that it seeks to contribute to the regeneration of this part of the Central Activities Zone as well as contributing to the target of 40,000 net additional hotel bedrooms by 2026 in suitable locations in London and more specifically in the CAZ as outlined in policy 3D.7 of the London Plan. This application seeks to meet the objectives of London’s Economic Development Strategy in supporting the delivery of the London Plan, to promote sustainable growth and economic development.

The LDA recommended that the Council ensured that local residents benefited from jobs created by this proposal, in particular those related to the hospitality industry, which for many is a gateway into employment. The need to secure initiatives to create training and employment opportunities for local people and addressing other barriers to employment was also raised. Had the Council resolved to approve the application, this would have been expected to be secured as part of a legal agreement. This should have also included local opportunities for local residents and
businesses during construction, as well as, with in the completed development, including in the supply of goods and services and sub-contracting opportunities.

**Response to consultation**

21 The Council consulted various statutory and non-statutory organisations as well as the 1,856 residents of neighbouring properties. Sixteen letter and email responses were received from neighbouring properties, comprising twelve objections, three observations and one email of support. The objections are summarised below:

- Loss of sunlight, daylight and privacy and lighting from the hotel affecting residential amenity.
- Increase in noise and traffic.
- Servicing of the site would conflict with the servicing needs of the Addington Street site.
- Development is in conflict with the adjacent listed building.
- Replacement building too high and bulky.
- Existing high provision of hotels in the area and therefore another one is not needed.
- Loss of nurses accommodation.

22 The three letters of observation raised the following points:

- Calcification sought regarding impact of the proposal on sight lines from St Paul’s Cathedral.
- The Listed Building should be adequately protected during neighbouring demolition to prevent damage.
- Clarification sought that the frontispiece of the hospital will be kept intact.

23 The one letter of support stated that the “demolition of the former nurses home and redevelopment of the entire site will improve the area and that part of York Road substantially”.

24 English Heritage raised serious objection to the scheme and urged Lambeth Council to refuse the application for the following reasons: “the proposed development involves the unjustified demolition of a curtilage Listed Building, and the proposed replacement structure detracts from the setting of the Grade II Listed former Lying-in Hospital. We also consider some of the proposed internal alterations to the Listed Building to be unsympathetic”. The City of Westminster considered it premature for planning permission to be granted in the absence of independently verified images which demonstrate the impact on views within the City of Westminster, namely those in and around the Palace of Westminster World Heritage Site. The Waterloo Community Development Group lodged an objection to the proposal on the grounds of design, scale, and impact on the Listed Building. In addition, English Heritage (Archaeology) and Thames Water requested a series of conditions.

**Legal considerations**

25 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected
application. The Mayor may also leave the decision to the local authority. If the Mayor decides to
direct that he is to be the local planning authority, he must have regard to the matters set out in
Article 7(3) and set out his reasons in the direction. The Mayor must have regard to the guidance
set out in the GOL circular 1/2008 when deciding whether or not to issue a direction under Article
7.

**Financial considerations**

26 Should the Mayor take over the application he would be responsible for holding a
representation hearing and negotiating any planning obligation. He would also be responsible for
determining any reserved matters applications (unless he directs the council to do so) and
determining any approval of details (unless the council agrees to do so).

**Conclusion**

27 Having regard to the Council’s draft decision notice there are no sound planning reasons
for the Mayor to intervene in this particular case and therefore no basis to issue a direction under
Article 7 of the Order 2008.
former General Lying-In Hospital
in the London Borough of Lambeth
planning application no. 09/02752/FUL

Strategic planning application stage 1 referral (new powers)

The proposal
Change of use and works to the existing General Lying-In Hospital building and construction of a part-five, part-thirteen, part-sixteen storey building on the adjacent site to provide a 246-bedroom hotel with accompanying restaurant and cafe.

The applicant
The applicant is General Lying In (York Road) Ltd, and the architect is Hamiltons.

Strategic issues
The principle of the redevelopment of this site for hotel use is in the interest of good strategic planning in London. However, in broad terms the application does not comply with London Plan policy. Further information relating to designated views, impact on the World Heritage Site, access and inclusive design, sustainable development, energy efficiency and transportation is required to ensure compliance with the London Plan.

Recommendation
That Lambeth Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 65 of this report; but that the possible remedies set out in paragraph 67 of this report could address these deficiencies.

Context
28 On 19 August 2008 the Mayor of London received documents from Lambeth Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 29 September to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

29 The application is referable under Category 1C of the Schedule of the Order 2008, “Development which comprises or includes the erection of a building more than 30 metres high and outside the City of London”.

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Once Lambeth Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

The 0.15 hectare site is located within the Waterloo Opportunity Area and is near Waterloo Station and County Hall. The site is bounded to the west by York Road, to the south by Addington Road, to the north by an 11-storey office building and to the east by the 15-storey Park Plaza hotel. The site currently contains two buildings, one of which is the Grade II listed former General Lying In Hospital building which was historically a maternity hospital before being used for office and training purposes by Guys and St Thomas’s Hospital Trust from 1976. The other building, which is not listed, was used for nurses’ accommodation until 1976. Both buildings are currently vacant.

The site as existing.

The site is between the southern end of Waterloo Station and the A3200 York Road which is part of the Transport for London Road Network (TLRN). The site has a public transport accessibility level of 6b which is the highest classification achievable. Given the proximity to Waterloo Station a wide range of public transport services are within easy reach. These include London Underground services including the Bakerloo, Northern, Waterloo & City and Jubilee Lines, fourteen standard bus routes, four ‘24-hour’ services and a number of night buses. National Rail services from Waterloo Station provide overland connections to south London and beyond.
Details of the proposal

34 General Lying In Ltd is seeking full planning permission for the redevelopment of the site and change of use and internal works to the General Lying In Hospital building to provide a 246-bedroom hotel with accompanying restaurant, cafe, servicing facilities and plant accommodation. The existing structure and fabric of the listed building is retained where possible. The proposal includes the construction of a part-five, part-thirteen and part-sixteen storey building, which sits adjacent to the retained building.

Case history

35 There is no relevant case history for this site. A number of adjoining sites have been the subject of recent planning permissions for hotel uses, including the Westminster Bridge island site to the south (PDU ref 0145h), and the site to the rear of the General Lying in Hospital building (PDU ref 0145d), both of which are fifteen storeys.

Strategic planning issues and relevant policies and guidance

36 The relevant issues and corresponding policies are as follows:

- World city role: London Plan
- Tourism/leisure: London Plan; Good Practice Guide on Planning for Tourism (DCLG)
- Urban design: London Plan; PPS1
- Tall buildings/views: London Plan; View Management Framework SPG
- Access: London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)
- Sustainable development: London Plan; Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor’s Energy Strategy; Sustainable Design and Construction SPG
- Transport: London Plan; the Mayor’s Transport Strategy; PPG13

37 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2007 Lambeth Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004).

38 The following are also relevant material considerations:

- The Lambeth Core Strategy Issues and Options.
- The Waterloo Opportunity Area Planning Framework.

World city role and tourism

39 The site in the Central Activities Zone (CAZ). London Plan policy 5G.2 establishes the strategic priorities for the zone, which include the need to “enhance and manage the role of CAZ as the country’s premier visitor destination” and to “identify and bring forward capacity through redevelopment within appropriate quarters of the CAZ, through development and redevelopment in Opportunity and Intensification Areas.”

40 The Waterloo OAPF states that given the importance of the area as a transport hub and Strategic Cultural Area, and that the development potential of the area should be maximised. The
redevelopment of this site located in the CAZ and within the Waterloo Opportunity Areas for visitor accommodation is therefore in accordance with strategic policy.

41 The applicant is encouraged to provide staff accommodation as part of the hotel development, in view of the labour market constraints facing the hotel industry and the wider need for affordable housing in London as set out in paragraph 3.294 of the London Plan.

42 The proposed land use complies with the London Plan.

Urban design

43 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London, and policy 4B.2 seeks to promote world-class high quality design and design-led change in key locations. In addition to Chapter 4B, London Plan policies relating to density (3A.3) and sustainable design and construction (4A.3) are also relevant. Design policies in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the Blue Ribbon Network.

44 The site is located one block east of County Hall and to the north of a busy roundabout that leads to Westminster Bridge Road. The general quality of architecture in the surrounding area is mixed, with several fine buildings from the first half of the 20th century to the west of the site and behind County Hall, late 20th century office buildings and contemporary developments including an eleven-storey office block to the north, the fifteen-storey Park Plaza hotel directly to the east of the site and a new fifteen-storey hotel in the middle of the roundabout. The site is just outside the boundaries of the South Bank Conservation Area, and the grade II listed building on the southern end of the site faces directly onto a square in the conservation area on the opposite side of York Road which connects to the rear of County Hall.

45 There are currently two buildings on the application site: the former General Lying-in Hospital, Grade II listed, refurbished and brought off of the listed buildings at risk register in 2003, and a former nurses’ accommodation on the northern half of the site, which is not listed. The proposal seeks to establish a hotel on the entire site, achieved by converting the listed building into hotel
accommodation and connecting it to a new structure on the site of the former nurses’ accommodation. The existing buildings are four, five and six storeys tall.

46 The applicant has submitted a design and access statement that outlines the evolution of the scheme and the extensive consultation with the Council, English Heritage, and other statutory consultees. The scale and disposition of mass on the site is appropriate to the context of the opportunity area whilst respecting the heritage assets within and around the site. The new building to the north of the listed building is split into four volumes which layer on one another from York Road towards the east, building in scale from four storeys along York Road up to sixteen storeys at the rear. By breaking down the scale in this manner, the design allows for the introduction of a series of elegant and slender volumes that contrast with some of the more slab-like tall structures in the surrounding area. The taller elements have been carefully sited on the north of the site to ensure they do not appear over the top of the listed building, and there is also a subtle gap between the new building along York Road and the listed building to improve the setting of that structure. The restrained scale along York Road corresponds to the scale of the listed building, whilst the elements towards the rear of the site rise to meet the scale established by the Park Plaza hotel behind.

View north along York Road of the proposal with the listed building in front (red brick and white) detailing and the proposed new addition including the 16 storey element to the rear.

47 The architecture and detailing is of high quality and will complement the decoration of the listed building by introducing a contemporary palette of decoration and layering of detail. Each of the taller contemporary volumes is clad in a different material, alternating from light to dark and primarily reflective. This variation serves to break down the mass of the building even further, by enhancing the perception of a cluster of slender volumes. The materials proposed are robust, with a selection of ceramic and aluminium cladding panels with vertical aluminium louvres for solar shading on a concrete frame.
Views of the proposal looking east from the back of County Hall. The proposal includes the 4 taller structures to the left of the listed building. The tall building in the background on the right is the existing Park Plaza hotel.

48 The Waterloo Opportunity Area Planning Framework sets out that developments along York Road should provide active frontages at ground level to enhance the quality of the pedestrian experience on the north-south route to Waterloo. This proposal incorporates a public cafe at ground level which contributes to the improvement of this important north-south route.

49 Overall, the proposal represents a high quality development that includes the reuse of a listed building and a sympathetic addition appropriate to the context of Waterloo station and opportunity area. The scheme is therefore compliant with London Plan policies 4B.1 ‘Design principles for a compact city,’ 4B.2 ‘Promoting world-class architecture and design,’ policies 4B.10 ‘Large-scale buildings – design and impact’ and policies 4B.11-13 relating to heritage conservation.

**Tall buildings and views**

50 Within the Waterloo Opportunity Area Planning Framework the site is within an area appropriate for tall buildings, but that building heights on this site should not be as high as those farther north along York Road (such as on the site of Elizabeth House). The framework also establishes that development on this site needs to respect local views of County Hall and the designated view from Victoria Embankment and consider the impact on the Palace of Westminster World Heritage Site.

51 The proposal is at its highest 16 storeys tall, in comparison to the most recent proposals for Elizabeth House which ranged from 20 to 33 storeys tall. The applicant has sought to ensure that the proposal does not appear in the designated view of County Hall from Victoria Embankment, and has provided an accurate visual representation to demonstrate this. No information has been provided to allow officers to evaluate potential impacts on other designated views, such as those along the Thames or local views from the Palace of Westminster World Heritage Site. As such it is impossible to assess whether the scheme complies with London Plan policies 4B.16-18.
**Inclusive design**

52 London Plan policy 3D.7 seeks to increase the quality and quantity of fully wheelchair accessible accommodation in London. The GLA’s hotel demand study assessed the supply of wheelchair accessible hotel accommodation in London and identified a shortfall of suitable accommodation. The Hotel Demand Study showed that very few hotels were using these standards to assess accessibility, and that few provided information to disabled people on how accessible their hotel is. As part of the London Development Agency’s Economic Development Strategy the Tourism Action Plan 2006–2009 endorses a vision for a London that is more accessible for everyone. The LDA is currently developing a project to promote compliance with National Accessible Standards for Hotels.

53 There is a minimum requirement under the Building Act 2000 that 5% of the bedrooms in the hotel will need to be designed for people with disabilities. The design and access statement demonstrates on plan that twelve rooms will be wheelchair accessible, equating to 5% of overall provision. London Plan policy 4B.5 requires all development to meet the highest standards of accessibility and inclusion; meeting the minimum standards required by Building Regulations does not suggest that the highest standard has been achieved. Given the shortage of wheelchair accessible hotel bedrooms in London, more than 5% of all guest rooms should be fully wheelchair accessible or easily adaptable if required. The Council should secure this provision by condition.

54 The applicant has demonstrated how the hotel will be accessed and traversed by all. Due to the need to retain the existing listed building, the development does not provide a level access entrance. The applicant has therefore included a ramp to provide for wheelchair access. This is a disappointing entrance treatment, although acceptable given the constraints of the listed building.

55 It is unclear where taxi pickup/drop-off will be accommodated as York Road is a very busy thoroughfare; if it is intended to be at the rear servicing entrance, the applicant should demonstrate how disabled guests can access the reception area after being dropped off at the hotel.

56 The application currently does not comply with London Plan policies relating to access and inclusive design.

**Climate change mitigation and adaptation**

57 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies with a target of 20% carbon reductions from on-site renewable energy. The policies set out ways in which developers must address mitigation of, and adaptation to, the effects of climate change. Policies 4A.2 to 4A.8 of the London Plan focus on how to mitigate climate change, and the carbon dioxide emissions reduction targets that are necessary across London to achieve this.

**Sustainable design and construction**

58 Policy 4A.3 of the London Plan requires all development proposals to include a sustainability statement. Further guidance on this policy is given in the Mayor’s SPG Sustainable Design and Construction. The applicant has produced an energy and sustainability strategy. This strategy demonstrates the measures proposed assessed against the Code for Sustainable homes criteria, but does not assess the proposal against the Mayor’s essential and preferred standards within the SPG.
The information submitted does demonstrate that a number of measures have been incorporated within the development, including green and brown roofs, plus the use of a green wall, and surface water drainage systems. The applicant has also indicated that water efficiency measures will be incorporated into the affordable units. However, the measures proposed do not adequately respond to London Plan sustainability policies or the Mayor’s SPG. The applicant should therefore submit a detailed sustainability assessment demonstrating compliance with all the Mayor’s essential standards and the relevant London Plan Policies, particularly 4A.3, 4A.11, 4A.14 and 4A.16.

Energy

Policies 4A.4-11 of the London Plan require a reduction in a development’s carbon dioxide emissions through the use of passive design, energy efficiency and renewable energy measures. The London Plan requires developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures and prioritising decentralised energy, including renewables.

Baseline carbon dioxide emissions

The applicant has provided calculations, using appropriate software, for the baseline carbon emissions. These demonstrate that the development complies with current building regulations. However, in establishing the carbon dioxide emissions for the development, the applicant has not considered unregulated energy uses, for example equipment/appliances. Therefore, the applicant needs to recalculate the baseline carbon dioxide emissions, and the emissions savings related to energy efficient design measures, combined heat and power, and renewable technologies, taking into account all unregulated energy usages.

Energy efficient design

The applicant has proposed a series of energy efficient design measures, which have been estimated to reduce carbon dioxide emissions by 12% beyond current building regulations. However, the applicant has not provided sufficient information regarding which energy efficient measures will be used to deliver this saving. Further information is therefore required regarding the types of measures proposed and their estimated carbon dioxide emissions savings.

Heating and cooling

The applicant has proposed to install a 33 kW combined heat and power unit to supply a proportion of the domestic hot water demand. The combined heat and power unit has been estimated to reduce carbon dioxide emissions by a further 25%. Whilst the principle of installing a combined heat and power plant is welcomed, the applicant has not related the proposed size of the unit to the domestic hot water profiles of the hotel. It is therefore not possible to determine whether the combined heat and power unit size has been maximised. Further information is therefore required to address this concern.

It is not clear whether the applicant is proposing to install all heat generating equipment in a single energy centre delivering heat to both the existing and new elements of the development via a single heat network. This is essential in determining the acceptability of the proposed strategy.

In addition, the applicant has not adequately demonstrated how the cooling requirements of the hotel will be met, although it is assumed that the proposed ground source heat pumps will
be used to provide an element of cooling. The applicant therefore needs to specify whether the ground source heat pumps will be able to meet all of the cooling requirements of the development, taking into account the type of system proposed (open or closed loop), and the required footprint to achieve this.

**Connection to existing or proposed energy networks**

66 The applicant needs to demonstrate that the proposed energy strategy allows for flexibility for future connection to any potential external site wide district-heating network.

67 The South Bank Employers’ Group has undertaken a feasibility study, carried out by London South Bank University, with support from the London Development Agency’s Decentralised Energy Delivery team, into the potential of an area wide district heating scheme in the South Bank, an area stretching from St Thomas’ Hospital to Blackfriars Bridge. This area represents an excellent opportunity for the development of an urban district heating and low carbon energy scheme, as it has the potential to deliver substantial carbon savings. The area has a number of existing large energy users with diverse demand profiles (St Thomas’ Hospital, Kings College, ITV, National Theatre, Shell, South Bank Centre etc) and is to be substantially regenerated over the next five to ten years, as a Mayoral Opportunity Area. The applicant is therefore advised to contact the LDA’s Decentralised Energy Delivery team for further details of the feasibility study and explore opportunities for linking into such a network at a future date.

**Renewable energy**

68 The applicant has proposed a combination of ground source heat pumps and photovoltaics in order to achieve a 20% reduction in carbon dioxide emissions in accordance with London Plan policy. However, a number of fundamental concerns are raised with regard to the renewable energy strategy which need to be addressed.

69 The applicant has given little consideration to the technical viability of using ground source heat pumps and therefore further information is required in order to demonstrate their suitability, and therefore acceptability, within the development. The applicant should submit the following information:

- The type of ground source heat pump proposed (close or open loop).
- Preliminary studies of the ground conditions of the proposed development.
- A demonstration that the proposed system is capable of providing 100% of the space heating requirements as claimed, paying particular attention to whether the building footprint would allow for this scale of system (either closed or open looped).
- Information regarding the proposed internal heating and cooling distribution systems of the hotel, considering the heat pumps will be providing hot and cold water at lower and higher temperatures than conventional systems.

70 Concerns are also raised with regard to the photovoltaics proposed. The applicant has estimated that 100 m2 of photovoltaics panels are feasible, and that this would displace 4.6% carbon dioxide emissions. However, concerns are raised regarding the validity of the values used in the submitted calculations. The calculations assume that approximately 800 kWh per m2 of photovoltaic panel would be produced. The values used in this calculation overestimate the energy yield that can be produced by photovoltaics by ten fold. The applicant should therefore recalculate
the carbon dioxide emissions savings offered by photovoltaics and assume a more realistic energy yield.

71 Therefore, the energy strategy raises a number of strategic concerns and does not accord with the sustainable design and construction or energy policies within the London Plan.

**Transport for London**

**Car parking**

72 The development is proposed to be ‘car-free’. TfL welcomes this restrained approach to car parking as it is in line with London Plan policy 3C.23, however in order to accord fully with this policy TfL expects a minimum of 1 blue badge parking space to be provided, and further details relating to blue badge parking arrangements are required. TfL expects all occupiers of the development to be excluded from eligibility for on street parking permits.

**Cycle parking**

73 A total of 6 secure cycle parking spaces are proposed. This is in accordance with TfL’s Cycle Parking Standards. The provision of showering and changing facilities is encouraged as is the provision of and number of at grade cycle parking spaces for use by short stay visitors/couriers. This will help meet the requirements of London Plan Policy 3C.22.

**Buses and bus priority**

74 TfL is satisfied that the existing bus network will be able to cope with the increase in passenger numbers created by this development.

**Taxis**

75 The taxi drop-off and pick-up arrangement must be reviewed following the revised highway arrangement resulting from the development at 1 Westminster Bridge Road which is currently being implemented. This zone will be the new location for the 341 and 381 bus stands and will be in use as early as March 2009. TfL wishes to discuss the relocation/removal of the taxi pick-up/drop-off facility with the applicant at the nearest possible opportunity.

**Coaches**

76 The transport assessment states that there will be minimal coach activity generated as a result of this development. TfL disagrees with this statement, as any hotel located in central London is generally known to attract large organised groups which often arrive and depart by coach. The developer must therefore provide a coach pick up/drop off facility in order to serve this hotel.

77 The applicant should investigate the incorporation of an informal coach drop off area located on Addington Street to accommodate one coach of 15 metres. If this location is not available, an alternative location within close proximity to the hotel would be welcomed by TfL. This issue must be resolved in order to meet the requirements of London Plan policy 3C.4.

**Servicing management**

78 This site is located at a key point on the TL RN therefore servicing activities need to be adequately provided for within the boundary of the site and in such a manner that the safety or movement of traffic on the TL RN will not be compromised. A Delivery and Servicing Plan (DSP)
consistent with the London Freight Plan (2008) should be provided and secured as part of the section 106 agreement.

79 Plans and servicing information for the Addington Street Hotel should be submitted and should include swept path diagrams and servicing trip generation to ensure there is no adverse cumulative impact as a result of the two developments. Visibility splays for service vehicles accessing and egressing from York Road should be provided to ensure compliance with London Plan policy 3C.25 ‘Freight Strategy.’

**Construction management**

80 A Constructions Logistics Plan (CLP) should be produced, and should include the cumulative impacts of construction traffic, likely construction trips generated, and mitigation proposed. Details should include site access arrangements, booking systems, construction phasing, vehicular routes and scope for load consolidation or modal shift in order to reduce the number of road trips generated. TfL expects both the DSP and CLP to be secured through the Section 106 agreement.

**Trip generation and highway issues**

81 TfL is satisfied with the trip generation assessment submitted. However, as noted above further details concerning servicing trips to the site must be provided.

**Travel plan**

82 TfL is satisfied that the objectives set out in the draft travel plan are appropriate for this development. However, would recommend that the objectives are more site specific, not only to the land use of the development, but to fit in with the local environment. TfL suggests that the targets for walking, cycling and public transport are increased by at least 5%.

83 The appointment of a Travel Plan Co-ordinator to ensure the implementation of the Travel Plan from construction to occupation is strongly supported by TfL. Baseline travel surveys followed by year one, three and five monitoring are in line with the TfL’s ‘Guidance for workplace travel planning for development.’ The use of iTrace is welcomed to assist the monitoring process. These proposed measures/changes will ensure compliance with London Plan Policy 3C.2.

84 Should this application be granted planning permission, the developer and their representatives are reminded that this does not discharge the requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.

85 Subject to the above issues being resolved, TfL generally supports this application.

**London Development Agency**

86 The proposal seeks to bring back into use a derelict site located in the Waterloo Opportunity Area and the Central Activities Zone, and as such is supported in principle by the LDA. The development will contribute to meeting the target of 40,000 net additional hotel bedrooms by 2026, and is therefore supported by London Plan Policy 3D.7.

87 This part of the CAZ is becoming an increasingly important hotel accommodation cluster, and as there are few 3 to 4 star hotel’s in this vicinity, the proposal will add to the breath of accommodation offer in this part of London.
88 In accordance with Policy 3B.11 of the London Plan, the Council should seek to ensure that local residents benefit from jobs created by this proposal, in particular those related to the hospitality industry. Initiatives to create training and employment opportunities for local people and to address other barriers to employment should be formalised through the legal agreement. This should also include local opportunities for residents and businesses during construction as well as within the completed development, including the supply of goods and services and sub-contracting opportunities.

**Local planning authority’s position**

89 The local planning authority is considering the proposal but has not yet set the date at which the application will be considered at planning committee.

**Legal considerations**

90 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

**Financial considerations**

91 There are no financial considerations at this stage.

**Conclusion**

92 London Plan policies on world city role and tourism, urban design, tall buildings and views, inclusive design, access, sustainable development, transport and parking are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- Tall buildings and views: It is unclear whether the proposal would appear in designated views along the Thames, or in views from the World Heritage Site. As such it is impossible to assess whether the scheme complies with London Plan policies 4B.16-18.

- Access and inclusive design: The proposal includes the minimum amount of wheelchair accommodation required and does not appear to provide pickup or dropoff locations for disabled guests and visitors, and therefore does not comply with London Plan policies 4B.5 and 3D.7.

- Sustainable development: The measures proposed do not adequately respond to London Plan sustainability policies or the Mayor’s SPG on sustainable design and construction. The applicant has incorrectly modelled the predicted CO2 emissions for the development, and the information submitted on energy efficiency measures, the approach to heating and cooling, potential for connection to energy networks, and the proposed renewable energy strategy is incorrect or insufficient.
• Transport: The arrangements proposed for taxi and coach pickup and drop-off are unsatisfactory, and the scheme does not provide any blue badge parking and as such is not compliant with London Plan policies 3C.4, 3C.20 and 3C.23. Further information is required in relation to the servicing strategy in order to comply with London Plan policy 3C.25.

93 On balance, the application does not comply with the London Plan.

94 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

• Tall buildings and views: submission of information to ensure the proposal complies with London Plan policies 4B.16-18, the London View Management Framework, and to demonstrate that it does not adversely impact the World Heritage Site.

• Access and inclusive design: increase in provision of accommodation for wheelchair users, improve pickup and dropoff arrangements, and provide a full assessment against the National Accessible Scheme from Visit Britain.

• Sustainable development: submission of a detailed sustainability assessment demonstrating compliance with all the Mayor’s essential standards and the relevant London Plan policies. Submission of accurate and detailed information elaborating on the energy efficiency measures proposed, the baseline carbon dioxide emissions, proposed emissions savings, approach to heating and cooling, potential for connection to energy networks, and the proposed renewable energy strategy.

• Transport: submission of changes to address deficiencies in taxi and coach pickup and drop-off arrangements, lack of blue badge parking, and information in relation to the proposed servicing strategy.

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