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

1 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.

2 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”.
3 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.

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

**Site description**

5 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.

6 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

7 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

8 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

9 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

10 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).

11 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

12 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.”

13 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.

14 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.

15 The proposed land use complies with the London Plan.

**Urban design**

16 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 polices 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.

17 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.

![Listed building on the right, former nurses’ accommodation on the left, and the existing Park Plaza hotel in the background.](image)

18 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.

19 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.

20 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.
21 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.

22 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

23 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.

24 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**

25 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.

26 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.

27 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.

28 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.

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

**Climate change mitigation and adaptation**

30 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**

31 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 kWe 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**

39 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.

40 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**

41 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.

42 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.

43 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.

44 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**

45 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**

46 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**

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

**Taxis**

48 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**

49 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.

50 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**

51 This site is located at a key point on the TLRN 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 TLRN 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.

52 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

53 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 though the Section 106 agreement.

Trip generation and highway issues

54 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

55 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%.

56 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.

57 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.

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

London Development Agency

59 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.

60 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.
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**

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**

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**

There are no financial considerations at this stage.

**Conclusion**

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.

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

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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