

8 Albert Embankment, Vauxhall

in the London Borough of Lambeth

planning application no. 19/01304/FUL

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing buildings, other than retention and conversion of Grade II listed former London Fire Brigade Headquarters building and Drill Tower, and phased mixed-use development in buildings of up to 26 storeys, including 417 residential units, a new fire station, a new London Fire Brigade museum, a hotel of up to 200 rooms, 10,809 sq.m. of business floorspace, retail space, with associated public realm.

The applicant

The applicants are **U+I** and the **London Fire Commissioner**, and the architect is **Pilbrow & Partners**.

Strategic issues summary

Principle of development: The redevelopment of this long vacant/under-used site in an Opportunity Area and the Central Activities Zone will contribute significantly to Council and GLA's aspirations for the site, particularly residential uses, significant employment space (including affordable), and emergency facilities. The principle of the uses proposed is supported in line with the London Plan, draft London Plan, and VNEB OAPF.

Affordable housing: 34% affordable housing, made up of 71% affordable/social rent, and 29% shared ownership. Although the proposals are subject to abnormal costs, including the provision of Lambeth Fire Station, the Fire Brigade Museum, and the conversion and restoration of listed buildings; as the threshold for publicly owned sites is 50%, the offer does not meet the requirements for the fast-track route and a financial viability assessment has been provided, which is undergoing assessment by the Council's advisers and GLA officers. Affordability thresholds and early/late stage viability reviews must be secured.

Urban design: The proposals are of a high design quality, and subject to further information and amendments to improve residential quality, are supported.

Historic environment: The proposals will cause 'less than substantial' harm to the listed buildings on the site and the Albert Embankment Conservation Area; however, this is outweighed by the considerable public benefits arising from the proposals. No harm will be caused to the Westminster World Heritage Site or strategic views.

Transport: The amount of car parking should be reduced, and the vehicle access arrangements revised in agreement with TfL. Financial contributions towards pedestrian and cyclist enhancements should be secured, and a review of the trip generation is requested to confirm public transport impacts.

Climate change: Further information has been requested on the energy strategy, Flood Risk Assessment, sustainable drainage, and urban greening.

Recommendation

That Lambeth Council be advised that the application does not yet comply with the London Plan and the draft London Plan, for the reasons set out in paragraph 103 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 9 May 2019, 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 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 Categories 1A, 1B(c), 1C(a), 1C(c), and 3E of the Schedule to the Order 2008:

- 1A *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”*
- 1B(c) *“Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings (c) outside Central London and with a total floorspace of more than 15,000 square metres.”*
- 1C(a) *“Development which comprises or includes the erection of a building of more than 25 metres high and is adjacent to the River Thames.”*
- 1C(c) *“Development which comprises or includes the erection of a building of more than 30 metres high and is outside the City of London.”*
- 3E *“Development (a) which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and (b) comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within any of the following classes in the Use Classes Order (i) class A1 (retail); (ii) class A2 (financial and professional); (iii) class A3 (food and drink); (iv) class A4 (drinking establishments); (v) class A5 (hot food takeaways); (vi) class B1 (business); (vii) class B2 (general industrial); (viii) class B8 (storage and distribution); (ix) class C1 (hotels); (x) class C2 (residential institutions); (xi) class D1 (non-residential institutions); (xii) class D2 (assembly and leisure).”*

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 environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended, has been taken into account in the consideration of this case.

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

Site description

6 The 1.06 hectare site is made up of three parcels, containing 17,714 sq.m. of floorspace:

- The west parcel (0.41 hectares) is bounded by Albert Embankment to the west, with the River Thames beyond; Black Prince Road to the south, beyond which are residential buildings of up to 13 storeys, and White Hart Dock dock; the International Maritime Organisation Headquarters to the north, of up to ten storeys, and the Windmill public house; and Lambeth High Street to the east, beyond which is the central parcel of the

application site. The parcel includes a Grade II listed building constructed in 1937 as the headquarters of London Fire Brigade, of up to ten storeys, and in 'Sui Generis' use as Lambeth Fire Station, with offices and sleeping accommodation above, although upper floors are largely vacant (floorspace 8,650 sq.m.). To the rear, in the south-west corner of the parcel, is a vacant three storey 1980s extension, known as the Communications Mobilising Centre (CMC) Building (1,763 sq.m.). The extension forms part of the listed building, although the listing description identifies it as not of special interest. The remainder of the site is made up of a hard-surfaced drill yard, used by the fire brigade for parking, training and fire related operations. The yard contains a stone Obelisk, built in 1940 as a ventilation shaft for a war-time underground bunker but never used for that purpose. On the east side of the yard is the Grade II listed 10 storey Drill Tower (135 sq.m.), also constructed in 1937, still in use for training purposes by the fire brigade.

- The central parcel (0.61 hectares) is bounded by Lambeth High Street to the west, with the west parcel beyond; Whitgift Street to the north, beyond which are residential buildings of up to 6 storeys and Old Paradise Gardens park; the railway viaduct between Waterloo and Vauxhall Stations to the east, with car-related and small-scale logistics uses in the arches beneath; and the Grade II listed Southbank House to the south, of up to six storeys, formerly part of the Royal Doulton Factory, now in use as office space, with the 23 storey 81 Black Prince Road residential block beyond. The parcel comprises an area of car parking that fronts onto Lambeth High Street; behind which is a two to four storey building (The Workshop, 6,980 sq.m.), partly in meanwhile use (to December 2019) as a temporary London Fire Brigade Museum, event space, and space for charities, social enterprises, and artists (Use Class D1), including the Migration Museum and Institute of Imagination. The use of the building will revert back to Sui Generis on expiration of the temporary use.
- The east parcel (0.03 hectares) lies on the other side of the railway viaduct. The north and west boundaries are formed by a car park associated with the former 'Ragged School' at 22 Newport Street, which lies to the north, currently used as the Beaconsfield Art Gallery; with Newport Street to the east and Black Prince Road to the south. The parcel previously provided surface level car parking associated with the fire station, but is currently leased and in use as a plant nursery.

7 All three parcels are located within the Albert Embankment Conservation Area. The West and Central parcels are within the Thames Policy Area and the Central Activities Zone (CAZ). The whole site falls within the background of a number of strategic views from Primrose Hill and Parliament Hill to the Palace of Westminster. The whole site also falls within the Vauxhall, Nine Elms, Battersea (VNEB) Opportunity Area.

8 The wider area between Albert Embankment and the railway viaduct is made up of large-scale buildings, with recently completed, under-construction and consented schemes (primarily residential) to the south of up to 30 storeys; and buildings to the north of up to 14 storeys. To the east of the railway viaduct, the context is primarily low-rise residential up to four storeys, including some retail as part of Black Prince Road local centre. Damien Hirst's Newport Street Gallery lies approximately 150 metres to the north of the east parcel.

9 The whole site is allocated for mixed-use development, including residential and employment uses, under Lambeth's Local Plan and Draft Revised Local Plan, with the central and east parcels within a Key Industrial and Business Area (KIBA).

10 The site is bounded by the A3036 Albert Embankment to the west, which forms part of the Transport for London Road Network (TLRN). The Vauxhall transport interchange is within 900 metres of the site, providing access to National Rail, Victoria line London Underground, and a number of bus services. In addition, bus stops are located within 100 metres of the site on

Albert Embankment. As such, the site is afforded a public transport access level (PTAL) of 6a, on a scale of 0 to 6b, where 6b represents the greatest level of access to public transport. There are currently no designated cycle routes on the A3036 in the location of the site, and a Cycle Hire docking station in close proximity to the site at Fire Brigade Pier.

Details of the proposal

11 The proposal includes 417 residential units, and over 24,000 sq.m. of non-residential floorspace within buildings of up to 26 storeys. This includes a 2,203 sq.m. fire station (Sui Generis); 1,434 sq.m. London Fire Brigade Museum (Use Class D1); 6,270 sq.m. hotel of up to 200 bedrooms (Use Class C1); 10,809 sq.m. of business floorspace (Use Classes B1(a)/B1(b)/B1(c)); 455 sq.m. of flexible retail floorspace (Use Classes A1/A2/A3/A4); a 173 sq.m. flexible commercial unit (Use Classes A1/A2/A3/A4/B1(a)/B1(b)/B1(c)/D1/D2); a gym of up to 2,053 sq.m. (Use Class D2); and a 865 sq.m. restaurant (Use Class A3); together with 1,900 sq.m. of new public realm (20% of the site), basement and surface parking, servicing and access.

12 On the west parcel, the CMC Building is proposed to be demolished, to be replaced by a ten storey L-shaped hotel. The submitted drawings identify 143 bedrooms for the hotel; however, it has been configured to allow flexibility for up to 200 bedrooms. The Grade II listed Fire Station Building will have partial demolitions at the rear and roof level, construction of a double-height glazed rooftop restaurant linked to the hotel via a tenth floor footbridge, with flexible ground floor space for retail or hotel use, and internal alterations and extension to facilitate the fire station, museum, and 95 residential units. The Obelisk will be relocated (or rebuilt if its physical condition does not allow relocation) to the central parcel and the Grade II listed Drill Tower refurbished to enable its continued use. A public space (South Square) is proposed at the corner of Lambeth High Street and Black Prince Road.

13 On the central parcel, The Workshop building is proposed to be demolished, and four buildings constructed of five, nine, 24 and 26 storeys, comprising a range of office and workspace units, a gym, flexible retail units, and 292 residential units. New public space includes 'Central Square', fronting on to Lambeth High Street; linking to 'Central Garden', including the Obelisk, connecting to the north to Whitgift Street and Old Paradise Gardens, and to the south to the 'Eastern Garden' and 'Eastern Link', which fronts onto Black Prince Road.

14 On the east parcel, an eleven storey building is proposed, providing a flexible retail/commercial unit at ground floor level, and 30 residential units above.

15 The planning application is accompanied by a Listed Building Consent application for works to 8 Albert Embankment, including the demolition of the CMC Building and Obelisk, and part redevelopment, restoration, conversion and extension.

Case history

16 An application was submitted by Native Land in January 2010 for "*refurbishment and extension of the Grade II listed fire station and the construction of seven new buildings ranging in height from 5 to 16-storeys, to contain 360 residential units and 7,214 sq.m. of commercial floorspace*" (GLA Ref: PDU/1414a/02; LPA Ref: 10/00318/FUL), with associated listed building and conservation area consent applications. Lambeth Council resolved to refuse the application on grounds of inappropriate development within the Key Industrial and Business Area (KIBA); failure to provide an appropriate mix of uses or a significant element of employment generating floorspace; unacceptable harm to the Grade II Listed 8 Albert Embankment, the Grade II Listed Drill Tower, the existing townscape, the Thames Policy Area and the Albert Embankment Conservation Area; overly dominant and incongruous additions to

the street scene; insufficient daylight, sunlight, overshadowing, light pollution and solar glare assessment; failure to demonstrate effectively how surface water will be managed; excessive car parking; insufficient information on the likely impact on traffic and highway safety; failure to demonstrate that the scheme would not be viable with a higher level of affordable housing (10%); and failure to include any designated child play space for children under 5. The draft decision was referred to the Mayor of London and Lambeth Council was advised that the Deputy Mayor (acting under delegated authority) was content for the Council to determine the case itself; however, the application was withdrawn before the decision was issued.

17 A revised application (the 'Appeal' scheme) was submitted by Native Land in December 2010 for "*refurbishment, alterations and extensions to the Grade II listed fire station, together with construction of seven new buildings to rear, ranging in height from 5 to 15-storeys, to contain a mixed-use development including a new fire station, 265 residential units, 8,554 sq.m. of commercial floor space, shops and retail uses, with associated parking, public realm and landscaping works*", (GLA Ref: PDU/1414b/02; LPA Ref: 10/04473/FUL), with associated listed building and conservation area consent applications. Lambeth Council resolved to refuse the application (against officer recommendation) on grounds of unacceptable harm to the Grade II Listed 8 Albert Embankment, the existing townscape, the Thames Policy Area, and the Albert Embankment Conservation Area; unacceptable harm to levels of daylight and sunlight to neighbouring residential properties; an unacceptably low level of affordable housing (7%); and failure to relate satisfactorily to the adjacent townscape in terms of height, massing and scale. The draft decision was referred to the Mayor of London and Lambeth Council was advised that the Deputy Mayor (acting under delegated authority) was content for the Council to determine the case itself and the decision was issued.

18 The applicant subsequently appealed against the refusal and a Public Inquiry was held in 2013. The Inspector identified the four main issues as; whether the scheme paid adequate regard to local employment and economic objectives; whether the proposed affordable housing was acceptable; the effect on the character, special interest and settings of listed buildings, the character and appearance of the Albert Embankment and Vauxhall Gardens Conservations Areas, and the surrounding locality; and the impact on the living conditions of nearby residential occupiers by reason of loss of daylight and sunlight. The Inspector concluded that the proposals were acceptable on three of the four main issues; however, the loss of daylight and sunlight to Whitgift House and 2 Whitgift Street represented a shortcoming in achieving a fully sustainable development, outweighing the benefits of the scheme and warranted dismissal of the appeal.

19 Following the dismissal of the Appeal scheme, the London Fire Commissioner held a competitive tender process, and selected U+I as its development partner in April 2016. A number of pre-planning application meetings for the current proposal have taken place with GLA officers since October 2016. Officers have been supportive of the principle of a residential-led mixed use development; with issues relating to employment space; housing; affordable housing; urban design; inclusive design; transport; and climate change to be addressed prior to the submission of any planning application.

Strategic planning issues and relevant policies and guidance

20 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 Lambeth Local Plan (2015) and the 2016 London Plan (Consolidated with Alterations).

21 The following are also relevant material considerations:

- The National Planning Policy Framework 2019 and National Planning Practice Guidance.

- The draft London Plan 2017 and the Mayor’s Minor Suggested Changes, which should be taken into account on the basis explained in the NPPF.
- In August 2017, the Mayor published his Affordable Housing and Viability Supplementary Planning Guidance. This must now be read subject to the decision in R(McCarthy & Stone) v. Mayor of London.
- Draft Revised Lambeth Local Plan (2018).
- The Kennington, Oval and Vauxhall (KOV) Neighbourhood Plan (2018 pre-submission).

22 The relevant issues, corresponding policies, and guidance, are as follows:

- Opportunity Areas *London Plan; draft London Plan*
- Industrial/employment *London Plan; draft London Plan*
- Central Activities Zone *London Plan; draft London Plan; Central Activities Zone SPG*
- Visitor infrastructure *London Plan; draft London Plan*
- Culture *London Plan; draft London Plan; Culture SPG*
- Social infrastructure *London Plan; draft London Plan; Social Infrastructure SPG*
- Housing *London Plan; draft London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; draft London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG*
- Urban design *London Plan; draft London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Accessible London: achieving an inclusive environment SPG*
- Historic environment *London Plan; draft London Plan; World Heritage Sites SPG; London View Management Framework SPG*
- Transport *London Plan; draft London Plan; Transport Strategy*
- Climate change *London Plan; draft London Plan; Sustainable Design and Construction SPG; Environment Strategy*

Principle of development

Opportunity Area

23 The site is located in the Vauxhall Nine Elms Battersea (VNEB) Opportunity Area (OA), as identified in the London Plan and the draft London Plan, which identifies the OA as having capacity for 18,500 new homes and 18,500 jobs. The VNEB Opportunity Area Planning Framework (OAPF) land use strategy identifies the area in which the site is located as being suitable for high-density mixed-use housing led intensification, with a mix of commercial and community uses, noting that Lambeth’s employment retention policies will continue to apply at Albert Embankment. The proposals are supported in line with VNEB OAPF policies.

Industrial and employment space

24 The site currently forms part of a wider Key Industrial Business Area (KIBA), identified in Lambeth’s Local Plan (2015) and draft Local Plan as Southbank House and Newport Street. For the purposes of the London Plan and draft London Plan Policy E4, the KIBA is defined as a Locally Significant Industrial Site (LSIS), which are locations that have particular local importance for industrial and related functions; however, it is noted that the Local Plan and the draft Local Plan define appropriate uses more widely than the draft London Plan, and “include all uses in the B use class (B1, B2 and B8)”. In commenting on Lambeth’s draft Local Plan, GLA officers

have asked the Council to set out a clearer approach to protecting industrial capacity by clearly setting out KIBA sites that are industrial, which should be protected for industrial use only (GLA Ref: LDD22/LDD16/HA01); and have recognised that it is unlikely this site would be suitable to re-provide industrial capacity.

25 The 2.36 hectare KIBA includes eight parcels of land, two of which comprise the central and the East parcels as part of the application site. As set out above, the central parcel has historically been in Sui Generis use as the fire station, and now includes temporary Class D1 uses, while the East parcel has been in use as a car park for the fire station, currently in temporary use as a plant nursery. Other than the application site, the KIBA contains office space, light industrial units, car-related and small-scale logistics uses in the railway arches, and two art galleries. The Council published a review of its KIBAs in October 2018 as part of its evidence gathering for its new Local Plan. This recommended that the Southbank House and Newport Street KIBA be retained in its current form, although it recognised that discussions concerning the application site would impact the potential for employment uses.

26 The site allocation within Lambeth's Local Plan (reflected in the draft Local Plan) identifies the preferred uses as retention of the fire station and a mix of uses, including residential and employment, with the amount of replacement employment being maximised, including space for small and medium enterprises. Although the Local Plan states that development in KIBAs will be permitted only for business, industrial, storage and waste management uses, and it prohibits residential uses; the site allocation confirms that, exceptionally, configuration of the site to include residential within the KIBA boundary may be considered if it can be demonstrated that this is necessary to achieve an acceptable scheme.

27 London Plan Policy 4.4 'Managing Industrial Land and Premises' provides a strategic aim for boroughs to adopt a rigorous approach to industrial land management, but recognises that managed release may be required to provide other uses in appropriate locations. Policy E4 'Land for industry, logistics and services to support London's economic function' of the draft London Plan identifies that sufficient land and premises need to be retained for industrial and related functions, and Table 6.2 identifies that Lambeth needs to retain capacity. Policy E7 goes on to state that development plans, frameworks and masterplanning proposals should be proactive and consider whether certain industrial and related functions in parts of LSIS could be intensified and/or co-located with residential and other uses. This approach should only be considered as part of a plan-led process of LSIS intensification and consolidation or as part of a co-ordinated masterplanning process in collaboration with the GLA.

28 The site is located within the Central Activities Zone (CAZ). London Plan Policy 2.10, draft London Plan Policy SD4, and the CAZ SPG set out strategic priorities for the CAZ, which include supporting the distinct offer of the CAZ based on a rich mix of local as well as strategic uses. The CAZ SPG and draft London Plan Policy SD5 states that offices and other CAZ functions should be given equal weight relative to new residential use in the VNEB OA.

29 London Plan Policy 4.2 'Offices', and draft London Plan Policy E1 support increases in the stock of offices of different sizes where there is evidence of demand, particularly in the CAZ, and Table 6.1 identifies a projected employment growth of 59% in the CAZ and Northern Isle of Dogs, equating to an additional 3.5 million sq.m. of office space between 2016 and 2041. Policy E2 'Low-cost business space' of the draft London Plan supports the provision of low-cost B1 business space to meet the needs of micro, small and medium-sized enterprises, particularly where proposals include new B1 business space greater than 2,500 sq.m., as proposed here. Policy E3 'Affordable workspace' of the draft London Plan identifies that in certain circumstances, consideration should be given to secure affordable workspace at rents below the

market rate. Lambeth's draft Local Plan requires 10% of the Use Class B1 floorspace to be made available at 50% of market rents for a period of 15 years in Waterloo and Vauxhall.

30 The non-residential space includes a 2,203 sq.m. new fire station (Sui Generis); 1,434 sq.m. London Fire Brigade Museum (Use Class D1); 6,270 sq.m. hotel (Use Class C1); 10,809 sq.m. of office floorspace (Use Classes B1(a)/B1(b)/B1(c)); 455 sq.m. of flexible retail floorspace (Use Classes A1/A2/A3/A4); a 173 sq.m. flexible commercial unit (Use Classes A1/A2/A3/A4/B1(a)/B1(b)/B1(c)/D1/D2); a gym of up to 2,053 sq.m. (Use Class D2); and a 865 sq.m. restaurant (Use Class A3). The mixed-use nature of the proposed scheme has been subject to extensive pre-application discussions over two years. The application materials assess a range of alternatives for employment-only uses within the KIBA part of the site in response to the site allocation requirement to maximise employment space. Some of these would result in greater employment floorspace/jobs; however, the constrained site would result in a significantly compromised design outcome, which would be likely to be undeliverable in viability terms, would result in far fewer homes and affordable homes, and negatively impact neighbouring residential amenity. Furthermore, the site contains no existing industrial use and has been in Sui Generis use for many years, and the proximity of existing housing, and the heritage context of the site, limit options for industrial use. It is also noted that the Inspector for the Appeal scheme (with less employment space) considered that the introduction of residential uses in the KIBA were justified, taking account of the amount of employment floorspace; the employment and wider economic benefits of the proposal; and the contribution of the proposals to regeneration and vitality in the local area.

31 The existing KIBA part of the site contains 6,980 sq.m. of floorspace within the Workshop Building on the Central parcel, which will be replaced by a significantly greater amount of employment space in the form of 10,809 sq.m. of Use Class B1(a)/B1(b)/B1(c) floorspace. It is recognised that large amounts of office space have been lost in the area in recent years as a result of other development proposals. Of the space proposed, 1,636 sq.m. is for micro, small and medium sized enterprises, the detailed design specification of which has been developed in consultation with the Council, and the applicant proposes that the design criteria for these units are secured by section 106 agreement, which is welcomed. Furthermore, 20% of the Use Class B1 floorspace is proposed to be delivered at an initial discounted rent of £15/sq.ft., with annual indexation for the first 15 years, and two medium workspaces at no more than 50% of the rent of the corporate office space for the first 15 years, which is welcomed, and should be appropriately secured.

32 GLA officers agree that the mixed-use approach blending residential and employment uses across the three parcels delivers greater planning benefits, including a wider range of jobs, more housing and affordable housing, an enhanced public realm, and additional heritage benefits. The proposals are supported in line with London Plan and draft London Plan policies on industrial space, the CAZ, and office space, including low cost and affordable space.

Residential

33 Policy H1 'Increasing Housing Supply' and Table 4.1 of the draft London Plan sets Lambeth an annualised average housing completion target of 1,589 units (increased from 1,559 in the current London Plan) per year between 2019/20 and 2028/29. The redevelopment of the site with residential uses as part of a mixed-use development, would contribute to London Plan and draft London Plan housing targets and is supported.

Visitor infrastructure and culture

34 Policy 4.5 of the London Plan identifies the need for 40,000 net additional hotel rooms by 2036, while draft London Plan Policy E10 supports strategically important accommodation in Opportunity Areas and the CAZ, and estimates that an additional 58,000 bedrooms are required by 2041. London Plan Policy 4.6 'Arts, Culture, Sports and Entertainment' supports developments that address deficiencies in cultural facilities in areas with good public transport, which is reflected in draft London Plan Policy HC5. The Mayor's 'Culture and the Night Time Economy' SPG provides further support to cultural venues.

35 Historically, the application site included London Fire Brigade Museum, which was demolished to make way for the construction of the CMC Building. The Museum then operated from Winchester House in Southwark until September 2015, when it closed in preparation for its intended move back to the application site; however, this did not take place due to the failure of the Appeal scheme. Since November 2016, The Workshop Building within the site has been the Museum's temporary home. The proposals will create a permanent home for the Museum, relocating it to its original location within the Former Headquarters Building. The layout of the museum has been flexibly designed to allow a range of exhibition space configurations and includes facilities for school groups. The Museum will support local education, as well as reinforcing the South Bank cultural offer.

36 The proposed hotel of up to 200 bedrooms, restaurant and London Fire Brigade Museum will promote tourism and provide visitor facilities. The hotel will also complement the proposed employment floorspace by providing visitor accommodation suitable for both business and leisure visitors. The principle of hotel, restaurant and museum uses is therefore supported in accordance with London Plan and draft London Plan policies.

Social infrastructure

37 Policy 3.16 of the London Plan and Policy S1 of the draft London Plan resist any loss of social infrastructure, including emergency facilities such as fire stations, and support new high-quality social infrastructure in areas of need.

38 Lambeth Fire Station is located within the Former Headquarters Building and has two fire engines, serving Lambeth and across the river to Whitehall and Victoria, including the Government Security Zone. The facility requires significant modernisation and accommodation for new and larger specialist vehicles. The new station will include space for four fire engines, with additional vehicles in the drill yard; staff accommodation; community engagement facilities; gym; and refurbishment of the drill tower for training purposes. Arrangements have been made for alternative service coverage when the station will be closed during construction (approximately 18 months). The principle of the re-provision of an up-to-date fire station is supported in accordance with London Plan and draft London Plan policies.

Principle of development - conclusion

39 The redevelopment of this long vacant/under-used site in an Opportunity Area and the Central Activities Zone will contribute significantly to Council and GLA's aspirations for the site, particularly residential uses, significant employment space, and emergency facilities. The principle of the proposed uses responds positively to London Plan, draft London Plan, and VNEB OAPF policies, and is supported.

Housing

Affordable housing

40 London Plan Policy 3.12 ‘Negotiating Affordable Housing’ seeks to secure the maximum reasonable amount of affordable housing. Policy H5 ‘Delivering affordable housing’ of the draft London Plan and the Mayor’s Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Policy H6 ‘Threshold approach to applications’ identifies a minimum threshold of 35% (by habitable room) affordable housing without public subsidy; or 50% on former industrial sites deemed appropriate to release for other uses, and 50% on land in public ownership. Applications providing that level of affordable housing, with an appropriate tenure split, meeting other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor, as well as investigating grant funding, can follow the ‘fast track route’ set out in the SPG. This means that they are not required to submit a viability assessment or be subject to a late stage viability review. Policy H7 of the draft London Plan and the Mayor’s Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined in partnership with the local planning authority and the GLA.

41 Lambeth’s Local Plan has a target of 50% affordable housing where public subsidy is available, with a 70:30 split between social/affordable rent and intermediate tenure.

42 The application proposes 34% affordable housing by habitable room (35% by unit), made up of 71% affordable/social rent, and 29% shared ownership, as set out below. It is noted that the proposals are subject to abnormal costs, including the provision of Lambeth Fire Station, the Museum, and the conversion and restoration of the site’s heritage assets, which impact the level of affordable housing. This offer includes Marginal Viability Funding through the Government’s Housing Infrastructure Fund (HIF). Considering that the site is in public ownership, it is subject to the 50% threshold (without grant) and the offer does not therefore meet the requirements for the fast-track route and a financial viability assessment has been provided, which is undergoing assessment by the Council’s advisers and GLA officers.

	Affordable/social Rent	Shared ownership	Market	Total
Studio	0	21	26	47
1 bed	30	26	117	173
2 bed	52	9	81	142
3 bed	8	0	47	55
Total	90	56	271	417
34% (hab rm) (71:29 split)				

43 As stated in the Mayor’s Affordable Housing and Viability SPG, the ‘existing use value plus’ (EUV+) approach to determining the benchmark land value is usually the most appropriate for planning purposes; however, an alternative approach may be considered in exceptional circumstances, where robustly justified. Through pre-application discussions with GLA and Council officers, the principle of an ‘alternative use value’ (AUV) approach has been agreed, since the use as a fire station means that there is not a quantifiable market for the site.

44 Should the application receive planning permission, the requirement for an early stage viability review will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted, as set out in the Mayor's Affordable Housing and Viability SPG; as well as a late stage viability review when 75% of the homes are sold/occupied. Further reviews may be necessary subject to phasing, and early delivery of affordable housing in relation to market units should be secured.

45 The affordable housing provision has been developed in discussion with Notting Hill Genesis, which has provided a supporting statement confirming that the social/affordable rent units would be delivered in line with Lambeth's Tenancy Strategy. This means that one/two bedroom units would have rents capped at Local Housing Allowance, whilst three bedroom units would be offered at Target Rent levels, to be secured in any section 106 agreement.

46 The affordability of intermediate shared ownership units must be in accordance with the Mayor's qualifying income levels, as set out in the Affordable Housing and Viability SPG and the London Plan Annual Monitoring Report, including a range of income thresholds. Following dialogue with the Council, it is proposed that ten homes will be affordable to household incomes of £60,000, with tiered affordability levels on the remaining homes. Affordability thresholds must be secured in the section 106 agreement attached to any permission. Should the Council be minded to grant permission, a draft section 106 agreement must be provided to GLA officers for comment/agreement, prior to any referral to the Mayor at 'Stage Two'.

Housing choice

47 London Plan Policy 3.8 'Housing Choice' encourages a choice of housing based on local needs, while affordable family housing is stated as a strategic priority. Policy H12 'Housing size mix' of the draft London Plan states that boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes; and for low cost rent, boroughs should provide guidance on the size of units required to ensure housing meets identified needs.

48 Only eight of the affordable/social rented units are family-sized; however, the affordable housing mix has been developed in collaboration with Notting Hill Genesis, which has specifically highlighted the demand for one and two-bedroom units in Lambeth. The market and shared ownership units provide mainly one and two bed units, which is supported in this central location, and allows greater affordability. The proposed mix of units is supported.

Children's play space

49 London Plan Policy 3.6 and Policy S4 of the draft London Plan seek to ensure that development proposals include good-quality, accessible play provision for all ages, of at least 10 square metres per child, with further detail provided in the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG.

50 The GLA child yield calculator provides an estimate of 100 children (59 under-fives), requiring 1,000 sq.m, of play space. The proposal includes 571 sq.m. of formal play space for under-fives within public and residential amenity areas in close proximity to both the market and affordable units; with additional areas providing opportunities for informal play for older children. Open and play spaces exist within the surrounding area, including a play area within the adjacent Old Paradise Gardens (100 metres); playgrounds within Pedlars Acre Gardens (100 metres) and Lambeth Walk Open Space (400 metres); outdoor sports within Vauxhall Pleasure Gardens (500 metres); and a play area and outdoor sports within Archbishop's Park (500 metres). The applicant has proposed a financial contribution through the section 106

agreement for enhancements to nearby facilities, which is welcomed. The application documents provide indicative designs and facilities. The play space proposals are supported.

Urban design

51 The applicant has responded positively to design matters raised over two years of pre-application meetings. GLA officers consider that the design of the proposals are of a high quality and are a significant improvement on the Appeal scheme.

Site layout

52 This physically constrained site in an area of high-density development raises significant challenges. The majority of the west parcel is occupied by listed buildings, with existing residential amenity considerations to the south; the central site is bounded by a railway viaduct to the east, and with existing residential amenity considerations to the north (of which daylight/sunlight impacts were given as the reason the Inspector dismissed the Appeal scheme); and the east parcel is bounded on the north and west sides by vehicular access to commercial uses in the railway viaduct arches.

53 Other than the listed Former Headquarters Building, the existing site presents a negative aspect to its surroundings, with extensive blank frontages and under-used/vacant buildings, and very limited permeability/public access. The proposals introduce a sequence of linked public spaces through the site, from South Square, to Central Square, to the Central Garden, and to the Eastern Garden and Eastern Link, connecting to Old Paradise Gardens. The proposed public realm represents 20% of the site, three times the amount of public space in the Appeal scheme. The 'Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution' chapter of the applicant's Environmental Statement demonstrates that the two main public open spaces (South Square and Central Square) will receive very good levels of sunlight. The public realm is lined by a range of active uses, with minimal blank frontages. The Eastern Garden fronts onto Southbank Buildings recently completed restaurant space, and includes a lightwell to small office spaces below, wrapped by a spiral cycle ramp, which will require careful detailing. Servicing of the central parcel is adjacent to the railway viaduct, accessed in between the proposed office building and the commercial uses in Southbank Buildings, which allows Central Square and Central Garden to be exclusively pedestrian.

Residential quality

54 London Plan Policy 3.5, and Policy D4 of the draft London Plan set out housing quality, space, and amenity standards, with further detail provided in the Mayor's Housing SPG.

55 The constrained site and the density of development proposed raises some challenges in terms of residential quality, particularly at lower levels on the central parcel. Separation distances between the Whitgift Street residential building and the Eastern Garden residential building are as little as eight metres; however, the use of cut-backs, angled views, and layouts of main living spaces means that an acceptable level of privacy will be achieved. The lower floors of the Eastern Garden building will also be affected by the environmental impacts from the railway viaduct. The applicants' noise and vibration assessment finds that a robust glass specification, would provide acceptable residential conditions, which should be appropriately secured. The applicant should consider whether winter gardens or additional internal floorspace would be a better alternative to balconies in this location.

56 The Whitgift Street residential building includes a small number of north-facing single aspect units, which the Mayor's Housing SPG states should normally be avoided. These units

achieve a good separation distance of approximately 20 metres to Whitgift House opposite and perform fairly well in terms of daylight levels; however, their quality could be improved by amending the double bay window arrangement to a single bay to help maximise daylight penetration. The same amendment would benefit single aspect units on the southern elevation of this building, which although south-facing, are impacted by the reduced separation distance to the proposed office building, which is also of greater height. The building also has units at the eastern end with convoluted entrances via long corridors, which should be reconfigured. A ground floor wheelchair unit should also be reconfigured to avoid a dark kitchen hidden behind a storage area.

57 Access cores are well distributed across the site, providing legible entrances and generally up to eight units per core on each floor. There are some instances of more than eight units per core on the lower floors of the listed Former Headquarters Building; however, it is recognised that this arises from the heritage restrictions of the listed building. Considering the site restrictions, the level of dual aspect units is acceptable. The applicant is requested to provide further analysis of the units that do not have private external amenity space, noting that the Housing SPG states that this may be acceptable due to site constraints where units are provided with additional internal living space.

58 The affordable block on the eastern parcel performs very well against residential quality standards, all units being dual aspect, generously sized, with three units per core on each floor.

Daylight, sunlight, and overshadowing

59 London Plan Policies 7.6 'Architecture' and 7.7 'Tall buildings' state that new development should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate, which is reflected in draft London Plan Policies D4 'Housing quality and standards' and D8 'Tall buildings'. The Mayor's Housing SPG provides further guidance and notes that an appropriate degree of flexibility needs to be applied when using BRE Guidelines to assess the daylight and sunlight impacts of new development. It states that BRE Guidelines "*should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets*", which should take account of "*local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time*". It also states that "*decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm*".

60 As discussed under 'case history' above, the Inspector for the 2010 Appeal scheme concluded that the loss of daylight and sunlight to Whitgift House and 2 Whitgift Street represented a shortcoming in achieving a fully sustainable development, which outweighed the benefits of the scheme and warranted dismissal of the appeal. Daylight and sunlight impacts are therefore an important material consideration.

61 The 'Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution' chapter of the applicant's Environmental Statement includes an assessment of the likely effects on daylight and sunlight amenity to surrounding residential properties; overshadowing to gardens, amenity areas and open space around and within the site; and daylight amenity within the residential elements of the proposals. Overall, the assessment concludes that the proposed development is likely to have minor to moderate negative residual effects on daylight, sunlight, and overshadowing. Daylight amenity to neighbouring residential units is assessed as being commensurate with a

dense urban location and is not considered to have an unacceptable impact on the amenity of surrounding land uses.

62 A Daylight and Sunlight Overview Report has also been produced to consider and compare the daylight/sunlight impacts of the proposal to the Appeal scheme. This shows significant improvements to key windows and rooms surrounding the development site, with the most noticeable improvements at Whitgift House and 2 Whitgift Street. Although the proposed 26 and 24 storey buildings are taller than the 15 and 13 storey buildings proposed as part of the Appeal scheme; they are of a slender diamond-plan, which allows greater sunlight and daylight penetration to the existing residential buildings on Whitgift Street, compared to the 'slab' blocks of the Appeal scheme. The top two storeys of the proposed five storey residential terrace are also set-back along the length of Whitgift Street, which allows greater daylight/sunlight penetration to neighbouring residential properties.

63 The very limited daylight and sunlight losses to adjoining properties is acknowledged; however, GLA officers consider that these impacts will not cause unacceptable harm to amenity or result in unacceptable living conditions, in accordance with London Plan and draft London Plan policies. Notwithstanding this, given the context and highly accessible location within central London, an appropriate balance needs to be struck with the benefits provided, as acknowledged in the Housing SPG and BRE guidance. As summarised under 'Historic environment, World Heritage Site and strategic views' below, these benefits are significant and are considered to outweigh this issue.

Density

64 London Plan Policy 3.4 and draft London Plan Policy D6 'Optimising housing density' seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the design, as described in draft London Plan Policies D4 'Housing quality and standards' and D2 'Delivering good design'.

65 The proposal would have a density of 1,662 habitable rooms, or 666 units, per hectare, which takes account of the non-residential uses proposed on the site as per the Mayor's Housing SPG. This is above the guidance ranges in Table 3.2 of the London Plan (based on a PTAL of 6 in a 'central' setting) and above the thresholds set out within Policy D6 of the draft London Plan, and therefore requires a greater level of design scrutiny. The proposals have been subject to four reviews by Lambeth's Strategic Panel during pre-application development, as well as benefiting from Council and GLA urban design expertise, and the applicant has responded positively to comments. It is also noted that the location within the Central Activities Zone, and an Opportunity Area with excellent public transport connections, in a context of existing and consented tall buildings, supports higher densities. As discussed in this report, the proposals are considered to be of a high design quality, and subject to further information demonstrating residential quality, the proposed density is supported.

Height, massing, and appearance

66 The architectural approach for the hotel extension, Whitgift Street terrace, Office Building, and the Newport Street Building is based on a brick grid composition with large recessed openings, and bays and set-backs to reduce the mass of the buildings. Tones of brick reflect the surrounding context, either matching the listed former Headquarters Building or the listed Southbank Building. The curved elevation to the Newport Street Building responds

positively to the corner with Black Prince Road, creating a generous footway and softening the impact of the massing.

67 The elevations of the two tall buildings on the central parcel are formed of glazing and muted grey infill panels, which respond to LVMF view requirements (as discussed below). The plan of the buildings creates very slender massing in some views, with expanding massing as views are rotated; however, the greater massing in some views is mitigated to a certain degree by the lightness of the cladding materials.

68 The character of the area is evolving and now includes a number of tall buildings of similar height to those proposed. Furthermore, the tall slender massing is partly a response to local daylight/sunlight amenity concerns and both tall buildings are below the maximum height of 90 metres identified in the VNEB OAPF. As discussed further below, the height and massing is supported in relation to heritage assets and LVMF views, and the architecture is considered to be of a high quality. In line with draft London Plan Policy D2, the Council should consider conditioning the ongoing involvement of the applicant's design team to ensure design quality.

Inclusive design

69 London Plan Policy 7.2 and Policy D3 of the draft London Plan seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum). Policy 3.8 of the London Plan and Policy D5 of the draft London Plan require that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings'; and all others must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. London Plan Policy 4.5 'Visitor infrastructure' requires that 10% of hotel rooms are wheelchair accessible. The supporting text to draft London Plan Policy E1, requires 10% of hotel bedrooms as wheelchair-accessible in accordance with British Standard BS8300 or 15% of as accessible rooms in accordance with BS8300.

70 The application materials demonstrate that the proposals will meet these requirements. Plans of the residential units are provided, which are spread across the buildings and all tenures. The Council should secure these requirements by condition as part of any permission.

Historic environment, World Heritage Site, and strategic views

71 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*", and in relation to conservation areas, special attention must be paid to "*the desirability of preserving or enhancing the character or appearance of that area*". The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation; and significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. London Plan Policy 7.8 and Policy HC1 'Heritage conservation and growth' of the draft London Plan state that development should conserve heritage assets and avoid harm. London Plan Policy 7.7, and draft London Plan D8 'Tall buildings' set out the Mayor's requirements for tall buildings.

72 London Plan Policy 7.10 'World Heritage Sites' and draft London Plan Policy HC2 state that development should conserve, promote and enhance their Outstanding Universal Value. Further guidance is provided in the Mayor's supplementary planning guidance 'London World

Heritage Sites - Guidance on Settings', and the Palace of Westminster World Heritage Site Management Plan.

73 London Plan Policy 7.12 and Policy HC4 'London View Management Framework' of the draft London Plan state that development should not harm strategic views, with further detail provided in the Mayor's supplementary planning guidance 'London View Management Framework' (LVMF SPG).

74 A large number of designated heritage assets are in the vicinity, as set out in detail in the applicants' Heritage, Townscape and Visual Impact Assessment (HTVIA). These include the Grade II listed Former Headquarters Building and the Drill Tower, within the site; the Albert Embankment Conservation Area, within which the site sits; a number of Grade I and II* buildings associated with Lambeth Palace (within Lambeth Palace Conservation Area), approximately 250 metres to the north; the adjacent Grade II listed Southbank House (former Royal Doulton Pottery); and the Westminster World Heritage Site (WHS), approximately 750 metres to the north-west of the site. As a place of Outstanding Universal Value, the WHS is a designation of the highest order, and as such it is an important planning consideration. The WHS also contains a number of statutory designations, which afford protection individually and collectively including the Palace and Abbey buildings include Grade I, Grade II*, and Grade II Listed Buildings; the Chapter House, Pyx Chamber and Jewel Tower are Scheduled Ancient Monuments; the whole of the WHS falls within the Westminster Abbey and Parliament Square Conservation Area; and the London Plan and the draft London Plan protect strategic views of the WHS.

75 The applicants' HTVIA and Heritage Renewal and Restoration Strategy (HRRS) provide a detailed analysis of the significance of the listed buildings within the site, which primarily derives from the main riverside elevation and some of the interiors of the Former Headquarters Building, with lesser significance from the rear elevation; and the Drill Tower. The HRRS details the current condition of the listed buildings within the site, finding windows, roofs, parapets and balustrades all past their service life.

76 The proposed works to the Former Headquarters Building would restore the main riverside elevation, restore the notable interiors, bring the building back into viable use (and partially its historic use), and demolish the 1980s CMC Building (identified in the listing description as not of special interest). This demolition would be beneficial to the setting of the listed buildings within the site, as well as the adjacent listed Southbank House. However, some harm will be caused by alterations to the rear elevation of the Former Headquarters Building, the hotel extension to the rear, and the addition of a double-height glazed extension (retaining the central watchtower). The interfaces between existing and new elements are generally handled sensitively; however, the applicant should provide further justification for the need for the rooftop extension to be double-height, since only a small amount of floorspace is included in the mezzanine level. Notwithstanding this, if carefully designed, the extension could be a high quality contemporary element, and any harm would be less than substantial.

77 The Drill Tower will be restored; however, some harm will be caused by the insertion of new window openings. The proposed buildings to the rear of the site will impact on the setting of the listed buildings, chiefly through the tall buildings. Although it is acknowledged that the proposed tall buildings are of high quality, they will appear above the listed buildings when viewed from the north, west, and south, causing some harm. However, the improvements to the public realm will be beneficial to the setting of the listed buildings.

78 Planning Practice Guidance identifies that a heritage benefit could be securing the optimum viable use of the heritage asset in support of its long-term conservation. The proposed

development would restore the listed building with sensitive interventions, retaining the original use to provide a modern fire station, and residential use is well-suited to the building, since the upper floors were also built as firefighter residential quarters. The residential values that can be achieved within the building are also important to the viability of the project. Subject to the outcome of viability considerations, GLA officers consider that the proposals would provide heritage benefits as the optimum viable use of the listed building.

79 The HTVIA also contains an analysis of the proposals from 34 verified viewpoints (including some of these at night and in different seasons), including 4 LVMF Assessment Points. All of the affected LVMF views analysed relate to the WHS, although other heritage assets are seen within the views. The site is within the Background Assessment Areas and Protected Vistas Extensions of 'London Panorama: Parliament Hill' from Assessment Point 2A.2, 'London Panorama: Parliament Hill' from Assessment Point 2B.1, and 'London Panorama: Primrose Hill' from Assessment Point 4A.2.

80 For 'London Panorama: Parliament Hill' from Assessment Point 2B.1, the LVMF states that *"small scale incremental change in the background of the three towers of the Palace of Westminster might be appropriate if it does not dominate the individual towers or diminish the spatial relationship between them"*. The proposed 26 storey building would exceed the Protected Vistas Extension threshold height and would appear in the background to the left of the Elizabeth Tower of the Palace of Westminster, although it is noted that it would largely be screened by a prominent tree on Parliament Hill, even when not in leaf. The building would appear as a recessive background element, below the treeline of distant hills and below the top of the spire of the Elizabeth Tower. During pre-application discussions, the applicant investigated various material colours and muted tones have been selected, which match the background trees/hills, in contrast with the stone of the Palace of Westminster. The proposed buildings would be consistent in scale with the wider skyline and would not dominate the Elizabeth Tower. The proposals would not be visible in the background of 'London Panorama: Parliament Hill' from Assessment Point 2A.2.

81 For 'London Panorama: Primrose Hill' from Assessment Point 4A.2, the LVMF states that *"development in the background of the Palace of Westminster should preserve or enhance the viewer's ability to recognise and appreciate the Strategically Important Landmark"* and *"the form and materials of new development should help improve the clarity with which the silhouette of the towers of the Palace of Westminster can be distinguished from their surroundings"*. The proposed 26 and 24 storey buildings would exceed the Protected Vistas Extension threshold height and would appear in the background to the left of the Victoria Tower of the Palace of Westminster. However, the proposed buildings would appear as a recessive element in the background, below the treeline of distant hills and below the turrets and finials of the Victoria Tower. The proposed buildings would be consistent in scale with the wider skyline and the silhouette of the Victoria Tower would be retained.

82 No concerns are raised about the impact of the proposals on 'River Prospect: Golden Jubilee/Hungerford Footbridges' from Assessment Point 17A.2 or the 'River Prospect: Westminster Bridge from Assessment Point 18A.2.

Conclusion - historic environment, World Heritage Site, and strategic views

83 The proposed additions, changes, and demolitions within the site are considered to be sensitive; however, some harm would be caused to designated heritage assets. GLA officers consider that any harm is 'less than substantial' and outweighed by the considerable public benefits arising from the proposals. These include heritage benefits as set out above; the creation of an up-to-date firefighting and emergency services base; the creation of a permanent

home for the London Fire Brigade museum, with associated educational, cultural, and tourism benefits; new homes, including affordable housing; the creation of a range of employment spaces, potentially including 1,250 jobs, plus additional business rates; economic benefits during construction and operation; improvements to the public realm; the creation of hotel space, including tourism benefits; and financial contributions towards the delivery of infrastructure.

84 GLA officers consider that the proposed buildings would cause no harm to the significance of the WHS or LVMF views. The proposals would conserve the Outstanding Universal Value of the WHS.

85 As the site is within the Albert Embankment Conservation Area, similar benefits and harm to the listed buildings within the site will impact the conservation area. The HTVIA concludes that the impact on other heritage assets in the vicinity (Conservation Areas, listed buildings, and locally listed buildings) is negligible (with some minor beneficial impacts), including heritage assets associated with Lambeth Palace. Taking account of the existing and emerging context of tall and large-scale buildings; GLA officers consider that the proposed buildings would cause no harm to the significance of these heritage assets.

86 In coming to this conclusion, GLA officers have had special regard to the desirability of preserving the setting of listed buildings, the desirability of preserving the character or appearance of Conservation Areas, and the relevant national and local policies identified above.

Transport

87 The applicant should consider Healthy Streets indicators to inform the design of the public realm and demonstrate that the proposals are compliant with draft London Plan Policy T2. An aspiration to provide enhancements to Albert Embankment for pedestrians and cyclists is included in the VNEB OAPF and a financial contribution towards these improvements should be secured as part of any planning permission, to be agreed with TfL. TfL has also consulted on a scheme at Lambeth Bridge South, which will improve safety and amenity for pedestrians and cyclists. It is expected that a large proportion of trips from the site will route via this junction, benefitting from the proposed improvements, and as such, a financial contribution towards the delivery of this scheme is also requested.

88 A total of 875 long stay cycle parking spaces and 152 short stay cycle parking spaces are proposed, which is compliant with the London Plan and draft London Plan Policy T5. The nearest Cycle Hire docking station located at Fire Brigade Pier ranks as one of the busiest of all docking stations that are operated by TfL. It is anticipated that the demand for Cycle Hire in this location will increase by at least 25% as a result of the proposal, which will require additional docking facilities to be provided. A contribution of £222,000 should be secured to deliver a new docking station, and a possible location within the public realm should be explored with TfL.

89 The central site would be provided with 78 residential car parking spaces. This includes 42 Blue Badge parking spaces, which equates to 10% of the total number of units proposed, in line with the London Plan and the draft London Plan. The additional 36 standard car parking spaces should be removed in order to comply with draft London Plan Policy T6, which requires residential development in areas of high PTAL (5-6) or within Inner London Opportunity Areas to be car-free. A total of 10 car parking spaces are proposed to serve the Fire Station, including one Blue Badge space, which is acceptable. The other non-residential uses should be provided with at least one on/off-street Blue Badge space, designed to allow flexibility between uses. The provision of charging facilities for electric vehicles should also be secured in line with the draft London Plan.

90 It is proposed that fire vehicles will exit onto Albert Embankment and enter via Lambeth High Street; however, the Lambeth Bridge South scheme proposes to restrict some vehicle turning movements, and an alternative routing strategy for vehicles must be discussed with TfL.

91 A drop-off bay is proposed on Albert Embankment to serve the Fire Station. This would considerably reduce the width of the footway within the highway boundary and impact the operation and safety of the TLRN. As such it is requested that this is removed from the proposals, subject to further discussion with TfL.

92 Further review of the trip generation and mode split is required to confirm the impacts on London Underground services. Confirmation of the data used to inform the trip generation and mode split for some proposed non-residential uses is also requested, to allow TfL to understand the full impacts of the proposal on the transport network, in accordance with draft London Plan Policy T4.

93 A two-space taxi rank is proposed on Lambeth High Street. Draft London Plan Policy T6 requires the provision of a rapid electric vehicle charging point for all taxi spaces, which should be secured in addition to the taxi rank, with the location to be agreed with TfL.

Climate change

94 The applicant's energy strategy follows the London Plan energy hierarchy, and is generally supported; however, the applicant should submit additional information on carbon emissions for the new-build and refurbished elements; building fabric energy efficiency; cooling and overheating; district heating; photovoltaics; and heat pumps.

95 The approach to flood risk management for the proposed development partly complies with London Plan Policy 5.12 and draft London Plan Policy SI.12. The Flood Risk Assessment should be amended to consider flood resilient construction for parts of the proposed buildings at residual risk of flooding from a tidal defence breach.

96 The surface water drainage strategies do not yet comply with London Plan Policy 5.13 and draft London Plan Policy SI.13. Further details should be provided on how sustainable drainage (SuDS) measures at the top of the drainage hierarchy will be included, and how greenfield runoff rate will be achieved.

97 The proposal generally meets the requirements of London Plan Policy 5.15 and draft London Plan Policy SI.5; however, the applicants should also consider water harvesting and re-use in order to reduce consumption of wholesome water across the entire site. This can be integrated with the surface water drainage system to provide a dual benefit.

98 The application should embed urban greening as a fundamental element of the proposals, in line with London Plan Policy 5.10 and draft London Plan Policies G1 and G5. The applicant should calculate the proposals' Urban Greening Factor, as set out in Policy G5 of the draft London Plan, and aim to achieve the specified target.

99 Full details on these requirements have been provided to the applicant and the Council.

Local planning authority's position

100 Lambeth Council officers have engaged in pre-application discussions for approximately two years. A Committee date has not yet been set.

Legal considerations

101 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. 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

102 There are no financial considerations at this stage.

Conclusion

103 London Plan and draft London Plan policies on Opportunity Areas, industrial/employment space; Central Activities Zone; visitor infrastructure; culture; social infrastructure; housing; affordable housing; urban design; historic environment; World Heritage Sites; strategic views; transport; and climate change, are relevant to this application. The application does not yet comply with the London Plan, for the reasons set out below; however, the possible remedies stated could address these deficiencies:

- **Principle of development:** The redevelopment of this long vacant/under-used site in an Opportunity Area and the Central Activities Zone will contribute significantly to Council and GLA's aspirations for the site, particularly residential uses, significant employment space (including affordable), and emergency facilities. The principle of the uses proposed is supported in line with the London Plan, draft London Plan, and VNEB OAPF.
- **Affordable housing:** 34% (hab room) affordable housing, made up of 71% affordable/social rent, and 29% shared ownership. Although the proposals are subject to abnormal costs, including the provision of Lambeth Fire Station, the Fire Brigade Museum, and the conversion and restoration of listed buildings; as the threshold for publicly owned sites is 50%, the offer does not meet the requirements for the fast-track route and a financial viability assessment has been provided, which is undergoing assessment by the Council's advisers and GLA officers. Affordability thresholds and early/late stage viability reviews must be secured.
- **Urban design:** The proposals are of a high design quality, and subject to further information and amendments to improve residential quality, are supported.
- **Historic environment:** The proposals will cause 'less than substantial' harm to the listed buildings on the site and the Albert Embankment Conservation Area; however, this is outweighed by the considerable public benefits arising from the proposals. No harm will be caused to the Westminster World Heritage Site or strategic views.
- **Transport:** The amount of car parking should be reduced, and the vehicle access arrangements revised in agreement with TfL. Financial contributions towards pedestrian and cyclist enhancements should be secured, and a review of the trip generation is requested to confirm public transport impacts.

- **Climate change:** Further information has been requested on the energy strategy, Flood Risk Assessment, sustainable drainage, and urban greening.

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