Strategic planning application stage 1 referral


The proposal

Erection of a part four, part five and part nine-storey library and archive, including a public entrance on Lambeth Palace Road, together with landscaping and other associated works (including highway works and works to Grade II Listed wall along Lambeth Palace Road).

The applicant

The applicant is The Church Commissioners for England, and the architect is Wright and Wright Architects.

Strategic issues summary

Principle of development: The provision of a purpose-built publicly accessible library and archive to house an internationally important collection of literature at a site of major historic significance within the CAZ is strongly supported in strategic planning terms (paragraphs 16 to 18).

Historic environment: The harm to heritage (necessary to facilitate this scheme) would be outweighed by significant public benefits, and the development would positively contribute towards the historic significance of Grade I Listed Lambeth Palace (paragraphs 19 to 31).

Design: The proposed four, five and nine-storey building is of high architectural quality in terms of both form and function (paragraphs 32 to 37).

Inclusive access: The design approach to access and inclusion is supported, however, the applicant is strongly encouraged to extend the existing period of free public access to the Lambeth Palace Library Collection (paragraphs 38 to 40).

Sustainable development: The proposed energy, climate change adaptation and biodiversity measures are broadly supported, however, the applicant is strongly encouraged to explore options to incorporate green/brown roof provision (paragraphs 41 to 43).

Transport: Revised servicing and access arrangements are sought in order to minimise impacts on the Transport for London Road Network (paragraphs 44 to 48).

Recommendation

That Lambeth Council be advised that whilst the scheme is strongly supported in strategic planning terms, it does not yet fully comply with the London Plan for the reasons set out in paragraph 52 of this report. The resolution of these matters could, nevertheless, lead to the application becoming compliant with the London Plan.
Context

1 On 17 January 2017 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 a statutory six week period 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. Nevertheless, in this case it has been agreed with Lambeth Council that the Mayor will provide this statement on 14 March 2017. 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 1.(c) of the Schedule to the Order 2008: “Development which comprises or includes the erection of a building… more than 30 metres high and is 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, unless otherwise directed.

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 Lambeth Palace and Gardens is located close to Albert Embankment, south of Westminster Bridge and St. Thomas’ Hospital. Located on Lambeth Palace Road, the Palace grounds fall within the Central Activities Zone (CAZ) as identified by the London Plan. The application site itself comprises a 3,000 sq.m. plot of land at the north west corner of Lambeth Palace Gardens, fronting Lambeth Palace Road. The site consists of open garden land (including trees and a pond), enclosed by a 2.5 metre high garden wall.

6 Lambeth Palace is the official London residence of the Archbishop of Canterbury, and also hosts research facilities and storage space for a significant number of books, texts and manuscripts. This literature forms part of a wider Lambeth Palace Library collection of some 230,000 pieces. Whilst a proportion of this collection is stored off site, the remainder is housed at Lambeth Palace, and is open to the public on a free of charge basis three days a week.

7 Lambeth Palace is a Grade I Listed Building with surviving elements from the 15th century. The great hall is known to date from 1663, whilst the main Palace residence was built during the first half of the 19th century. Lambeth Palace Gardens was restored during the 1960s and, whilst not publically assessable, is a Registered Park and Garden of Special Historic Interest Listed Grade II (the garden wall is also Grade II Listed). In addition, the Lambeth Local Plan identifies the palace gardens as a borough Site of Importance for Nature Conservation (SINC), and both the Palace and Gardens collectively form part of the wider Lambeth Place Conservation Area.

8 There are numerous other heritage assets in the wider area including the Albert Embankment Conservation Area and various Grade II Listed Buildings at St. Thomas’ Hospital to the north and west; and, Grade II* Church of St. Mary to the south. To the east of the site is Archbishop’s Park. Once part of Lambeth Palace Gardens, this land was gifted as a public park at the turn of the 20th century. Archbishop’s Park is accessed from Lambeth Palace Road, and this land is included within the Lambeth Place Conservation Area.
Lambeth Palace Road (A3036) forms part of the Transport for London Road Network and is served by three bus routes that pass the site. The nearest station, Vauxhall, is one kilometre away. Overall the site registers a public transport accessibility level of six (on a scale of zero to six(b) - where six(b) denotes the most accessible locations in the capital).

Details of the proposal

It is proposed to erect a publicly accessible library and archive to house the Archbishop of Canterbury’s historic collection of over 120,000 books, manuscripts and ecclesiastical archives. The proposed building would be part four, part five and part nine-storeys, with a public library entrance created on Lambeth Place Road. As part of the library facilities, the proposal would include a reading room; exhibition space; conservation rooms; a publicly accessible tower room (for events and cityscape views); and, associated staff and servicing areas.

The proposal includes works to a modern section of the Grade II Listed Garden Wall to provide access to Lambeth Palace Road, as well as various remedial landscaping works for Lambeth Palace Gardens including the formation of a new pond and additional tree planting.

Case history

In October 2016 a pre-application meeting was held at City Hall to discuss this proposal. In summary, the responses issued by GLA officers advised that the principle of providing a publicly accessible library and archive to house an internationally important collection at this site is strongly supported in strategic planning terms. It was acknowledged that the proposal would result in some harm to heritage assets, however, officers are of this view that it could be possible to outweigh this harm, subject to the demonstration of appropriate public benefits. In particular, the applicant was advised to seek to enhance free or charge public access to the library, and to develop the architectural approach to ensure that the building would be as engaging as possible with the public realm. Various other detailed issues to address were identified with respect to sustainable development and transport matters.

Strategic planning issues and relevant policies and guidance

The relevant issues and corresponding policies are as follows:

- Central Activities Zone: London Plan; Central Activities Zone SPG;
- Historic environment: London Plan;
- Urban design: London Plan; Shaping Neighbourhoods: Character and Context, SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG;
- Inclusive access: London Plan; Shaping Neighbourhoods: Accessible London: Achieving an Inclusive Environment SPG;
- Sustainable development: London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy;
- Transport: London Plan; the Mayor’s Transport Strategy;
- Crossrail: London Plan; Mayoral Community Infrastructure Levy; and, Crossrail SPG.
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 since 2011).

The following are also relevant material considerations: National Planning Policy Framework; and, National Planning Policy Guidance.

**Principle of development**

16 London Plan Policy 2.10 seeks to enhance the unique international role of the Central Activities Zone (CAZ), and to sustain and enhance the zone’s distinctive environment and heritage through high quality design and urban management. The CAZ SPG provides further guidance on the implementation of this policy and, in particular, recognises the contribution that the rich historic fabric of the CAZ makes towards London’s unique cultural offer and role as a World City.

17 The principle of providing a purpose-built publicly accessible library and archive facility to house and conserve an internationally important collection of historic literature at Lambeth Palace is strongly supported in strategic planning terms. The proposal would support the historic significance of Lambeth Palace; and, create a new resource for research and learning, positively contributing to the existing chain of educational and cultural venues along this section of the Thames in line with London Plan policies 2.10, 4.6 and 7.9, and the CAZ SPG.

18 Notwithstanding this, the sensitivities of this historic setting (including the proposal to construct the library building within a Registered Park and Garden of Special Historic Interest) raises a number of heritage issues. These are considered within the historic environment section below.

**Historic environment**

19 The library at Lambeth Palace was founded by Archbishop Richard Bancroft in 1610. The Archbishop stipulated that the extensive collection of literature (comprising some 230,000 pieces, including over 120,000 books as well as the archives of the Archbishops of Canterbury and other church bodies) must stay at Lambeth Palace. Amongst this irreplaceable collection is a set of original manuscripts dating from the 9th century onwards, as well as various important writings relating to English social, political, economic and ecclesiastical history. Together, these documents form a collection of international importance.

20 Due to its size and fragility, only part of the collection is currently housed at Lambeth Palace (in the Great Hall and within Morton’s Tower), whilst the remainder is in storage at a facility in Bermondsey (to which there is no public access). The collection at Lambeth Palace is accessible to the public (free of charge) three days a week. However, the historic Palace buildings cannot provide an optimum storage environment for historic documents, and as a consequence the collection has been increasingly affected by damp and air pollution. Therefore, the preservation of the collection in appropriate storage conditions has become an urgent priority.

21 Accordingly, the proposed development seeks to provide a purpose built archive facility that would:

- reunite the internationally important Lambeth Palace Library collection as a single assemblage;
- provide environmental conditions to support improved document conservation;
• enable improved public access to the collection (including inclusive access for wheelchair users);
• positively contribute towards the historic significance of Lambeth Palace (Grade I) by reuniting the Lambeth Palace Library collection and accommodating this at the Palace site; and,
• support the integral relationship of the collection with Parliament and the Church of England, in keeping with the founder’s decree that the collection should remain at Lambeth Palace.

22 GLA officers are of the view that the points above collectively constitute significant public benefits in line with London Plan policies 2.10, 7.8 and 7.9. However, noting the sensitivity of the context, and, in particular, the fact that the proposal includes partial development of Lambeth Palace Gardens, these benefits must be carefully weighed against any associated harm caused to heritage assets.

Impact on heritage assets

23 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 makes clear that special regard must be had to the desirability of preserving Listed Buildings, their settings, or any features of special architectural or historic interest that they may possess. Paragraph 132 of the NPPF states that “substantial harm to or loss of a Grade II Listed Building, Park or Garden should be exceptional.” In line with the NPPF, London Plan Policy 7.8 states that “where a development proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal.”

24 Whilst not publically accessible, Lambeth Palace Gardens is a Registered Park and Garden of Special Historic Interest (Grade II), and a borough Site of Importance for Nature Conservation (SINC). The Gardens also form a fundamental part of the setting to Lambeth Palace (Grade I). Noting these various sensitivities, GLA officers sought to verify at pre-application stage that this is the most appropriate location for the archive. Following a review of alternative options, and having fully considered the historic value and significance of housing the full Lambeth Palace Library collection at Lambeth Palace (refer to paragraph 21), GLA officers strongly support the proposal to deliver the archive on-site within the Palace Gardens.

25 The proposed location for the archive is an area of land at the northern end of the Palace gardens, approximately 200 metres from the Palace. This area has been identified as most favourable for a number of reasons – including the fact that it has been assessed as one of the least historically important parts of the garden; and, that (whilst still technically included within the Grade II Listing) the section of wall bounding this particular part of the garden was constructed during the early 1960s. The location of the library and archive here would allow for associated public access to be introduced through this modern section of wall; in an area of relatively low impact; and, at the part of the site with highest public transport accessibility. The arrangement would also buffer the garden from the large-scale Evelina building of the St. Thomas’s hospital complex and ensure that the Palace would continue to benefit from a coherent garden space, with its most historic features preserved in situ.

26 The built footprint of the proposal would, nevertheless, result in a loss of approximately 3% of the Grade II Listed Garden of Special Historic Interest, as well as the loss of a (modern) section of Grade II Listed garden wall along with various trees within the Listed Garden and Lambeth Place Conservation Area. In addition, the proposed four to nine-storey building would affect the character/setting of various heritage assets, including the Listed Garden and Lambeth Place Conservation Area, as well as the setting of Lambeth Palace (Grade I) itself. The proposed
development would also affect the only part of the Place Garden SINC which includes pond habitat.

27 It is noted that the proposed development includes various measures to mitigate the impacts identified above, including: extensive re-landscaping of land around the proposed building to enhance the appearance of this part of the Garden and to enrich biodiversity (refer to paragraph 42); a well-considered approach of retaining high quality mature trees wherever possible and providing an overall uplift in trees through replacement planting (refer to paragraph 43); and, high quality architectural response to surrounding heritage assets (refer to paragraphs 32 to 37).

28 Having regard to the above (and the associated consideration elsewhere in this report), GLA officers are of the view that the proposed development would result in: less than substantial harm to Lambeth Palace Gardens (Registered Park and Garden of Special Historic Interest, Grade II); no harm to historic Garden Wall (Grade II); no harm to the character of the Lambeth Place Conservation Area; and, no harm to the setting of Lambeth Palace (Grade I).

29 More generally, having regard to the verifiable visualisations within the submitted Townscape, Visual Impact and Heritage Assessment, and pursuant to the associated assessment within the urban design section below, GLA officers are of the view that the proposal would not cause harm to the numerous other heritage assets within the vicinity of the site.

30 Accordingly, in line with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, GLA officers are of the view that the less than substantial harm to heritage proposed as part of this development would be outweighed by the significant public benefits set out in paragraph 21 above. Accordingly, the proposed development would help to unite, house and preserve an internationally important collection of literature for public access - positively contributing towards the historic significance of Lambeth Palace (Grade I) in line with London Plan policies 2.10, 7.8 and 7.9.

31 It is noted that, in its statutory response of 10 February 2017, Historic England comes to a broadly similar conclusion, stating: “the proposals will result in a range of impacts to the historic environment. Whilst some of the impacts of the development will be harmful, it is also felt there would be clear benefits, including direct heritage benefits, realised by the proposals and, on balance, the scheme is supported.”

Urban design

32 The proposed library building is laid out as a linear block which runs along the northern boundary of the garden. The library fronts Lambeth Palace Road, and would provide a generously proportioned double height entrance hall area which has been designed to include public exhibition space. The building comprises a nine-storey tower with four and five-storey wings. A public viewing gallery is proposed at the top of the tower element. This elevated space is intended to support events, as well as community outreach programmes, and would provide a new publically accessible viewpoint towards Lambeth Palace and the Palace of Westminster.

33 The critical archive function of the building necessarily constrains fenestration (due to the need to manage the impact of light damage to documents). However, in less sensitive areas, and at the key public-facing parts of the building, generous glazing is proposed to provide natural daylighting to internal spaces and active frontage onto Lambeth Palace Road and the Palace Gardens. This, in conjunction with a detailed and high quality brick treatment for elevations (including rustication and the inclusion of decorative courses), ensures an overall architectural appearance of very high quality.
Whilst the site is not oversailed by any protected viewing corridors, the scale of the proposed development means that it could have an impact on London View Management Framework (LVMF) river prospects; local views; and, the character/setting of neighbouring heritage assets (including: Albert Embankment Conservation Area, Lambeth Place Conservation Area, Grade I Lambeth Palace, Grade II* Church of St. Mary, Grade II St. Thomas’ Hospital complex and the Grade I Palace of Westminster World Heritage Site).

In response to this the applicant has submitted a Townscape, Visual Impact and Heritage Assessment which includes verifiable views to establish impact on the townscape and heritage assets. Having regard to this it is noted that in longer views and river prospects (including views to and from the Palace of Westminster) only the top of the proposed library tower would be visible. This would be viewed in the context of the general townscape (including taller buildings within the St. Thomas’s Hospital complex) and would not adversely impact on the setting of the World Heritage Site (WHS). Within the more immediate context of the site, the curvature of Lambeth Palace Road generally limits long range views of the proposal. It is further noted that the shoulder height of the building is set below the height of the trees surrounding the site – meaning that, in many instances, only the tower element would be visible. When in leaf, trees would also screen the majority of the proposal in views from the rear terrace of Lambeth Palace. However, whilst the tower element would remain visible from this position, it would be seen in the context of the existing large-scale Evelina building at the St. Thomas’s hospital complex.

Further to the above, and related consideration in the historic environment section of this report, and having had special regard to the desirability of preserving Listed Buildings, their settings and any features of special architectural or historic interest which they possess, GLA officers are of the view that the proposal would provide an appropriate response to context and would not harm the character or setting of the conservation areas or listed buildings identified within the applicant’s Townscape, Visual Impact and Heritage Assessment. Moreover, the proposal would not harm the Outstanding Universal Value of the Palace of Westminster World Heritage Site. Accordingly GLA officers are of the view that the application accords with London Plan policies 7.8 and 7.10.

Overall, the proposed design is a well-considered, imaginative response to a challenging brief at a heavily constrained site. The architect and applicant are commended for the quality of the scheme that they are bringing forward.

**Inclusive access**

The applicant has set out its response to access and inclusion within the Design and Access Statement. This scheme represents an important opportunity to provide an inclusive environment to study and enjoy this library of historic literature, and GLA officers particularly support the proposed outreach strategy - which is likely to raise the profile of this collection in order to ensure its benefit to the wider community may be more fully realised.

Based on the submitted plans it is evident that the principles of access and inclusion have been generally very well considered. Accessible routes are provided throughout the building and the entrance area is legible and inclusive. Floorplate layouts are efficient whilst providing suitably generous circulation space; and, lifts and disabled WCs are conveniently located. The applicant should, nevertheless, pay careful attention to the treatment of the service yard entrance area on Lambeth Palace Road – ensuring that this would be clearly demarcated by tactile landscaping treatments.
Further to the above, and in line with the intention to make Lambeth Palace Library as accessible and inclusive as possible, the applicant is strongly encouraged to commit to extending the period of free public access to the collection from three days (as is the current situation) to six.

**Sustainable development**

**Energy strategy**

In accordance with the principles of London Plan Policy 5.2 the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions. In summary the proposed strategy comprises: energy efficiency measures (including a range of passive design features and demand reduction measures); a futureproofed energy centre for the building; and, renewable technologies (including photovoltaic panels and air source heat pumps). The applicant has calculated that the approach proposed would achieve a 35% reduction in carbon dioxide. The strategy is broadly supported in line with the London Plan energy hierarchy, however, GLA officers are currently in discussions with the applicant and Council in order to obtain various detailed clarifications and assurances. Once agreed, the proposed energy strategy (and associated carbon dioxide savings) will be secured by way of planning condition/obligation as appropriate.

**Climate change adaptation, biodiversity and trees**

The scheme includes various planting and landscaping improvements to this part of the Palace Gardens (SINC), including: enhancement and enlargement of the existing garden pond to provide more biodiverse wetland habitat (as part of a sustainable drainage strategy); an increased area of biodiverse herbaceous and shrub planting; a new wildflower meadow; an enhanced mix of native trees; and, a refuge strategy for target faunal species. This is strongly supported in line with London Plan policies 5.10, 5.13 and 7.19. The applicant is, nevertheless, strongly encouraged to explore opportunities for green/brown roof area (in addition to the photovoltaic array) in line with London Plan Policy 5.11.

It would be necessary to fell 23 Conservation Area trees (including two street trees on Lambeth Palace Road) in order to facilitate the development. However, the proposal has been designed to allow for the retention of high quality trees wherever possible, and only four of the trees identified for removal are assessed to be of moderate quality (the remainder are all low quality). To mitigate the loss of existing trees the applicant proposes a comprehensive replanting strategy which, overall, would deliver a significant uplift in trees at the site (and on-street) in line with London Plan Policy 7.21.

**Transport**

**Site access**

Principal site access is proposed via Lambeth Palace Road, which forms part of the Transport for London Road Network (TLRN). Whilst an on-site servicing yard would be provided as part of the development (with the majority of servicing to be accommodated on-site), a loading bay is also proposed on the highway. It is understood that the loading bay would primarily be used for refuse collections.

In order to accommodate the proposed loading bay and associated on-street servicing access, a reduction in footway width is proposed (along with the removal of two street trees – refer to paragraph 43 above). TfL has raised concerns with the arrangement as currently
proposed – particularly due to the impact on footway. Accordingly, TfL is engaged in discussions with the applicant and the Council to secure a revised arrangement (supported by an updated safety audit). The proposals will also need to provide for level and safe access for pedestrians across Lambeth Palace Road (via dropped kerbs).

46 To this end the applicant has been advised to prepare an updated scope of highway works for consideration prior to determination; with a detailed strategy to be secured by condition; and the works themselves secured via Section 106 and Section 278 agreements as necessary. Moreover, given the location of the site on TLRN (and the nature of the proposed servicing arrangements), a construction management plan and delivery and servicing plan should also be secured by condition.

Parking

47 The applicant proposes a single on-site Blue Badge parking space (with an electric charging point) for staff use, with all other Blue Badge parking to be located at the main entrance to Lambeth Palace. This is an acceptable arrangement, but should be clearly articulated as part of the visitor information strategy for the Palace and library.

48 TfL strongly supports the proposed provision of 26 cycle parking spaces, which is in line with London Plan standards. Nevertheless, pursuant to paragraphs 45 and 46 above, TfL seeks to ensure that these spaces a provided off the highway.

Local planning authority’s position

49 The local planning authority is still assessing the scheme, however, Lambeth Council is expected to formally consider the application at a planning committee meeting in April 2017.

Legal considerations

50 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. 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

51 There are no financial considerations at this stage.

Conclusion

52 London Plan policies on Central Activities Zone, historic environment, urban design, inclusive access, sustainable development and transport are relevant to this application. The scheme is strongly supported in strategic planning terms, but does not yet fully comply with the London Plan as set out below:
Principle of development: The provision of a purpose-built publicly accessible library and archive to house an internationally important collection of literature at a site of major historic significance within the CAZ is strongly supported in line with London Plan policies 2.10, 4.6 and 7.9, and the CAZ SPG.

Historic environment: The associated less than substantial harm to heritage (necessary to facilitate this scheme) would be outweighed by significant public benefits, and the development would positively contribute towards the historic significance of Lambeth Palace (Grade I). The application complies with London Plan policies 2.10, 7.8, 7.9 and 7.10.

Urban design: The proposed four, five and nine-storey building responds well to the sensitivities of this the site and context, and is of high architectural quality in terms of both form and function. The application complies with London Plan Policy 7.1 and the architect and applicant are commended for the quality of the scheme that they are bringing forward.

Inclusive access: The design approach to access and inclusion is supported in line with London Plan Policy 7.2. The applicant is, nevertheless, strongly encouraged to extend the existing period of free public access to the Lambeth Palace Library Collection.

Sustainable development: Following clarifications on the energy strategy the Council will secure the relevant energy, climate change adaptation and biodiversity measures by way of planning condition in accordance with London Plan policies 5.2, 5.10, 5.13, 7.19 and 7.21. In addition, the applicant is strongly encouraged to explore opportunities for the inclusion of green/brown area in line with London Plan Policy 5.11.

Transport: Revised servicing and access arrangements are sought in order to minimise impacts on the Transport for London Road Network. Construction and servicing plans also need to be secured by way of planning condition to ensure accordance with London Plan policies 6.10, 6.13 and 6.14.