

PLANNING APPLICATIONS COMMITTEE 14 DECEMBER 2021
SECOND ADDENDUM: AMENDMENTS AND ADDITIONAL INFORMATION ON AGENDA ITEMS

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<u>ITEM 3</u>		
Erection of a nine storey building comprising a commercial unit (Class E) at ground floor and basement level and 9 no. self-contained residential flats (Class C3) on the upper levels. 21/01864/FUL		
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19	<p>Add the following to the end of Paragraph 6.3.5:</p> <p>A further representation from the Waterloo Community Development Group was received, objecting to the proposal. The newly raised planning considerations are summarised below:</p> <ul style="list-style-type: none"> The £60,000 contribution towards the redevelopment of Emma Cons Gardens will have little impact in relation to the estimated £1m costing of the works, including around £60,000 annually for upkeep. <i>Officers' Comments: The contribution is considered to be of an acceptable scale to the proposed development.</i> The daylight and sunlight considerations have misunderstood the scale of the housing proposal on the adjoining car park site. <i>Officers' Comments: As mentioned within this report, there is no live application or pre-application on the adjoining car park site. Despite this, mitigation measures have been imposed on the current proposal in order to avoid prejudicing potential development on the adjoining site (see Paragraph 8.6.7.1).</i> The sustainability of the building is given as a public benefit, but this does not take into account the high embodied carbon in the concrete and metal construction. 	No

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	<p><i><u>Officers' Comments:</u> The proposal is not a GLA referable scheme and therefore does not trigger the whole life carbon cycle requirements of London Plan Policy SI 7.</i></p> <ul style="list-style-type: none"> The only biodiversity benefits are an unmaintainable green wall and an inexplicable dovecote and arrangements for feral pigeons. <p><i><u>Officers' Comments:</u> The Applicant has provided details regarding green wall access (including the use of abseiling) and officers are satisfied that it can be adequately maintained. Green walls have been supported in previous permissions on the Site; however, the current proposal improves the viability of the green wall through improved access to sunlight. Details of the dovecote are to be secured under Condition 19, which will prevent any inappropriate use.</i></p> <ul style="list-style-type: none"> Officers have incorrectly assessed the changes in commercial floorspace – the proposal would provide 87sqm of commercial floorspace, which is less than the 152sqm in the 2019 approval under ref 19/03654/VOC. <p><i><u>Officers' Comments:</u> The proposal would provide c. 117sqm of commercial floorspace. As discussed in this report, there would be an increase over the pre-existing retail unit. A reduction is proposed in comparison to the commercial unit in the 2019 approval; however, this commercial unit has not been built out so there would not be a loss of floorspace. In addition, there would be a minimal change in relation to active shop floorspace.</i></p> <ul style="list-style-type: none"> The view in Figure 8 is not appropriately documented as a verified view and there is no evidence provided in the application that it follows the methodology set out in the guidance Landscape Institute: Technical Guidance Note 6/19 Visual Representation of Development Proposals, as required if this were an EIA. Figure 8 is quite clearly a wide angle greater than it is possible to see without moving the eyeballs or head, and clearly distorts such as to maximize the edges (the Old Vic) and minimize the central object (the proposed development). 	
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	<p><i><u>Officers' Comments:</u> The image is considered to show an accurate depiction of the proposal and the surrounding context of the Site.</i></p> <ul style="list-style-type: none"> The heritage assessment takes an incorrect approach which excludes all of the space around the heritage asset and does not include kinetic views. The proposal is situated within the setting of the Old Vic and would result in heritage harm to the asset. <p><i><u>Officers' Comments:</u> As explained in this report, a detailed assessment has been undertaken by the council's specialist heritage officers, based largely on views which have been identified by the Old Vic in previous applications. Officers have therefore concluded that there would be no heritage harm. The proposal was also referred to Historic England, who have chosen not to comment on the proposal.</i></p>	
23	<p>6.3.11 <u>Lambeth Estate's Resident Association (LERA)</u></p> <p>A representation from LERA was received on 10/12/2021, raising the following objections to the scheme:</p> <ul style="list-style-type: none"> The proposal would overlook the carpark to the rear of the site and would be built up to the boundary. We have plans to develop the carpark for 10 units of social housing. The proposal would therefore stymie development on the adjoining site. The carpark development site would provide more additional homes than the application and would also provide social housing. <p><i><u>Officers' Comments:</u> As mentioned within the report, there is no live application or pre-application on the adjoining car park site. Despite this, mitigation measures have been imposed on the current proposal in order to avoid prejudicing potential development on</i></p>	No

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	<p><i>the adjoining site (see Paragraph 8.6.7.1 of the PAC report).</i></p> <ul style="list-style-type: none"> The height of the proposed building is completely at odds with everything else surrounding Emma Cons Gardens and with previous planning applications. <u>Officers' Comments:</u> <i>These comments are assessed within the 'Design' and 'Impact on Heritage Assets' Sections of this report.</i> While the Waterloo Estate building will be huge by comparison, it is set back from Emma Cons and retains the existing Mercury House, facing the gardens as a podium that conforms to the height of all other buildings around them. <u>Officers' Comments:</u> <i>Noted.</i> It will inevitably set a precedent for any building alongside and in due course for the bus station site. <u>Officers' Comments:</u> <i>The proposal has been assessed on its own merits and site constraints, and is considered acceptable on the Site. Any nearby future development sites must be assessed on their own merits upon submission. The proposal is considered to be an appropriate response to the Site, as detailed within this report, which would not set any negative precedents for the surrounding area.</i> 	
44	<p><u>Economic</u></p> <ul style="list-style-type: none"> Increased commercial unit floorspace at ground floor and basement when compared with the extant permission. pre-existing retail unit. 	No
<p><u>ITEM 4</u> 20/04194/EIAFUL Lambeth Hospital</p>		

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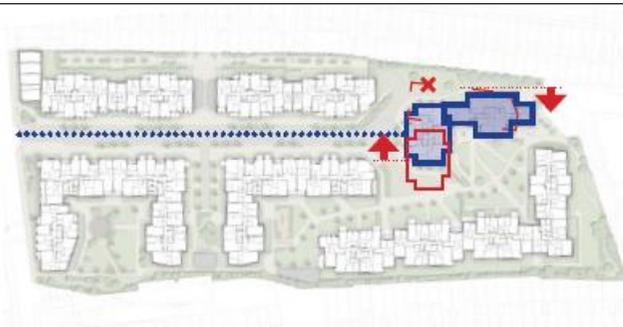
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132	<p>Summary of objections table – last row Letter of Support received by WSP on behalf of Guy’s and St Thomas’ NHS Foundation Trust updated to refer to further comments received as follows:</p> <p>The Informative referencing engagement with the Trust is weak in relation to our representations made in October 2021.</p> <p>Our representations on the application highlighted several areas in which the Trust seek to be engaged with by South London and Maudsley NHS Foundation Trust, including: the design of the pedestrian/cycle route through to Pulcross Road, and the preparation of the Waste and Servicing Management Plan and the Construction Management Plan to ensure that there are no negative impacts or conflicts with the operations of the Pulross Centre (neighbouring the development, operated by the Trust).</p> <p>The informative currently drafted does not require communication with the Trust with flexible wording such as ‘where possible’ undermining the importance of the consultation. In our role supporting the Trust, on other permissions we have had condition wording and Section 106 obligations cover similar topic material on other permissions in Lambeth, such as Elizabeth House and the development to the rear of Clapham Common South Side Tesco’s.</p> <p>We therefore request an amendment to the list of conditions and committee report to ensure that the Applicant engages with the Trust on the matters listed above. For the wording of each condition, we have referenced above, we request that a requirement is included for evidence of engagement to be part of the submitted documents, to ensure that engagement with the Trust has taken place.</p> <p>Officer comment: As noted in the officer comment at the last row of the table. It would not be appropriate to consult a third party neighbour as part of condition in this instance, but the applicant would be encouraged to discuss these matters</p>	Yes

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TOWER ALIGNED TO AVENUE

Center of Tower aligned to the centerline of the main avenue servicing the site. Block to South East of taller building redesigned to improve potential route to Pulross Centre and better define courtyard.

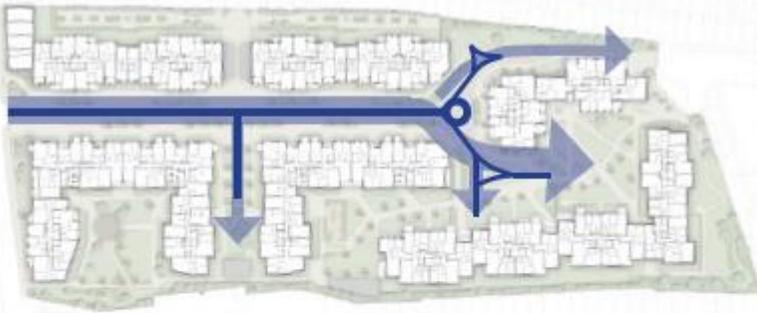
The Tower was considered to be a key element within the masterplan form and as such it was felt that in its proposed asymmetric position in relation to the street it was somewhat apologetic. It was agreed that the tower should be moved on axis to the main street as an appropriate terminus to this route. As a consequence, the strong symmetry of the tower is replicated in this location within the masterplan.

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IMPROVED ACCESS

Moving the tower improves movement to and from the South West Corner of the site.

Access to the furthest reaches of the masterplan in the south west corner was felt to be restricted by the position of the tower and adjacent residential blocks. The underpass to the east of the tower was considered not to be as generous in scale as a gateway to the area beyond its threshold. The relocation of the Tower also facilitated a natural flow around it for both pedestrians and service vehicles.

This was further enhanced by chamfering the corners of the two adjacent residential blocks. This reduction in mass created both better sightlines and a more natural flow to pedestrian movement to the south west corner of the site and a similar flow to the south east corner for a potential future link through the Pulross Centre.

- Courtyards should be clearly defined as private realm for residential use only.

ESA Architecture Response: The courtyards are clearly defined as private realm for the resident by being primarily enclosed by the block arrangements. Access to the courtyards is either through the buildings or through gates with controlled access.

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	<ul style="list-style-type: none"> The impact of Block 7 will need to be thoroughly tested. A wind study should be used to inform the design and layout of blocks and landscaping. <p><u>ESA Architecture Response:</u> Wind study undertaken by windtech tested the impact of the proposed forms on the movement of wind across the site. This highlighted some areas around the lower part of block 7 where higher and more dense balustrades as well as specifically located trees would be required to mitigate wind movement and achieve acceptable levels of comfort.</p> <ul style="list-style-type: none"> Recommends that external cycle stores are located internally and not externally. <p><u>ESA Architecture Response:</u> There is a generous provision of cycle storage across the scheme. The vast majority of cycle storage is provided within the main building forms. Each building primary cycle storage needs are located close to access points. A relatively small number of ‘overspill’ cycle stores are located in the Greenway or residential courtyards. The ‘overspill’ cycle stores are purpose built, weathertight, brick buildings which resemble the materials and build quality of the residential blocks.</p> <ul style="list-style-type: none"> Suggest replacing external cycle stores with terraced housing to create strong terminations to vistas within the scheme. <p><u>ESA Architecture Response:</u> We explored the possibility of having townhouses in the locations suggested, but it was not possible due to window offsets and the close proximity to the site boundary.</p> <p>To put townhouses in this location would compromise the efficient arrangement of blocks 5 and 6 as the window to window distances would not meet the requirements to provide privacy and prevent overlooking within the scheme.</p> <p>The Townhouses would also have a primary aspect directly facing existing neighbouring buildings on Hubert Grove. Given the close proximity to the site boundary we felt this was unacceptable.</p> <ul style="list-style-type: none"> The proportion of landscaping to the built environment and whether the scale of development can be accommodated. 	
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ESA Architecture Response: The area of Landscape amenity proposed is in excess of the Policy requirements for the number of residential units. Lambeth's policy requires circa 2000m² of communal amenity. Our Proposal provides over 5000m² of communal amenity.
The London Plan recommends a target Urban Green Factor (UGF) score of 0.4 for residential developments, and a target score of 0.3 for commercial developments. The proposal exceeds this requirement with a UGF score of 0.47.

- Recommends a cohesive SUDS strategy for the site.

ESA Architecture Response: Cohesive SUDS strategy has been incorporated into the Landscape design.

- Acknowledged the improvements to some courtyard areas. Raised concerns about the unstructured and unsuccessful arrangement of Blocks 3, 4 and 7 and the quality of the courtyard.

ESA Architecture Response: In response to the Second DRP and further PPA, Rev F of the masterplan design was amended to include the following:



REVISION D MASTERPLAN

Block 4 massing on the Western site boundary was reduced by creating a break in the built form.

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Block 4 massing on the Western site boundary was reduced by creating a break in the built form.



TOWER ANNEX REDESIGN

Block to south east of taller building redesigned to improve potential route to Pulross Centre and better define courtyard.

Block 3 massing was brought further West to improve the futureproof pedestrian link through the Pulross centre and better define courtyard.

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SPATIALLY DEFINED COURTYARDS

south west open space revised into courtyards with boundaries defined by the architecture.

Blocks 4 and 6 rearranged to create clearly defined courtyards rather than one linear urban park.

- Encouraged windows to corridors to provide natural light.

ESA Architecture Response: An exercise was undertaken to explore this option. Whilst this would create a more pleasant corridor spaces, the negatives impacts were seen to outweigh the positives.

Implementing this would have affected the scheme negatively by reducing opportunities to provide 'through aspect' units and compromising the quality of unit layouts or increasing building footprints.

- Encouraged windows to corridors to provide natural light.

ESA Architecture Response: An exercise was undertaken to explore this option. Whilst this would create a more pleasant corridor spaces, the negatives impacts were seen to outweigh the positives.

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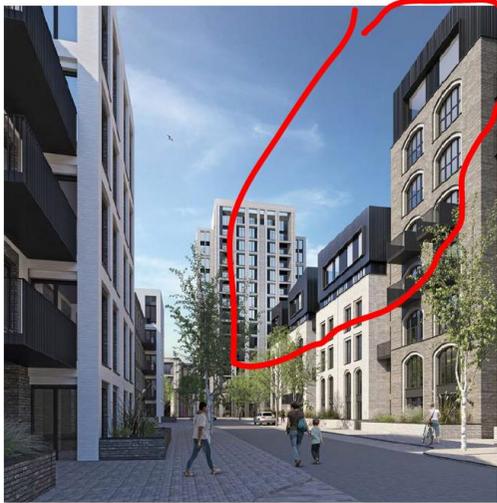
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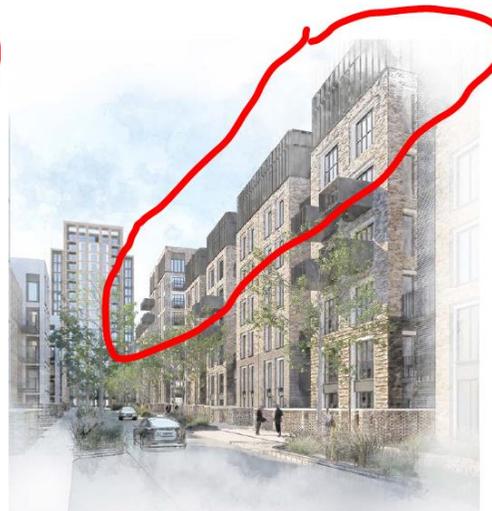
Implementing this would have affected the scheme negatively by reducing opportunities to provide ‘through aspect’ units and compromising the quality of unit layouts or increasing building footprints.

- In terms of detailed design, suggested simplifying the design in particular the roof form and that careful considered should be afforded to balcony type/character.

ESA Architecture Response: The roof form in question was simplified to reduce variation in angle / pitch.



VIEW B - HIGH-RISE TOWER



VIEW B - TOWER AND MAIN BOULEVARD

With regards to the balconies. The proposal provides private amenity to every unit. We were careful to not cover the buildings in bolt-on balconies. The balconies are designed in a variety of forms including – In-board, terraces and bolt-on.

In-board balconies are recessed within the buildings primary form and provide a more sheltered amenity with less exposure to the elements and a greater sense of privacy.

Terraces are only deliverable in certain areas where the building plan reduces and provides a platform above built form from the level below. Generally this occurs towards the top of each building. Naturally, terraces afford better views and more privacy as there is less overlooking towards the top of each building.

Bolt-on balconies provide a more exposed amenity with better natural light. Bolt on balconies are integrated into the overall building design through materiality and by creating opportunities to provide variation in form.

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	<p>The plans and elevations show the use of each of these types of balconies across the scheme.</p> <ul style="list-style-type: none"> Acknowledged the constraints involved in the scheme attaining Passivhaus standard. However, considering the scheme is required to provide 50% affordable housing on site provides the incentive to achieve Passivhaus. <p><u>ESA Architecture Response:</u> The design has taken into account available commercial and economical opportunities and has identified the following areas which are compliant with the Passivhaus standard and will look at the outstanding items during design development to see where any improvement maybe made. With regards to the Passivhaus fabric standards ($U < 0.15w/m2.k$) for all thermal transmittance of walls, floors and roofs, the Lambeth Development is exceeding the Passivhaus standard for floors and roofs with a value of $0.11w/m2.k$ and with the walls being slightly over with a value of $U = 0.16w/m2.k$. For the glazing, the development exceeds Passivhaus G' value requirement ($G' < 0.5$) with a G' value of 0.36.</p> <p>There is no cooling within the development, so it complies with the Passivhaus targets for Space Cooling demand and Specific Cooling load. In terms of the Primary Energy Demand the development is below the 120kWh/m2.yr target. The development also complies with Space Heating Demand, with all units achieving a value under 15 kWh/m2.yr. In addition, the Lambeth development also meets the Passivhaus requirement for high efficiency appliances and lighting. Further context as to how the scheme compares to Passivhaus standards are set out in the table below</p>	
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<i>Design Component</i>	<i>Passivhaus Limiting Design value</i>	<i>Current Lambeth Design value</i>
Walls (U-values)*	≤0.15 (W/m ² K)	0.16 (W/m ² K)
Roof	≤0.15 (W/m ² K)	0.11 (W/m ² K)
Floor	≤0.15 (W/m ² K)	0.11 (W/m ² K)
Glazing unit	≤0.8 (W/m ² K)	1.2 (W/m ² K)
Installed glazing	≤0.85 (W/m ² K)	1.2 (W/m ² K)
Doors	≤0.8 (W/m ² K)	1.5 (W/m ² K)
Infiltration (ach ⁻¹)	≤0.6 @ n ₅₀	3 @ n ₅₀
Thermal bridging (linear ψ value)	≤0.01 (W/mK)	0.05-0.5 (W/mK)
MVHR coefficient (η _{HR})	≥0.75	0.782
Ventilation electric limit	0.45 Wh/m ³	Calculation required
Appliances	High efficiency recommended	High efficiency
Lighting	High efficiency recommended	High efficiency
On site renewables	No requirement but SHW typical	ASHP and PV