Section 2 – Application Summary

Location
8 Albert Embankment And Land To Rear Bounded By Lambeth High St, Whitgift St, The Railway Viaduct, Southbank House Together With Land Corner Of Black Prince Rd And Newport St London

Ward
Prince’s

Proposal

Application Refurbishment, alteration and extension to the grade II listed fire station to provide a fire station and associated functions for the London Fire Brigade (sui generis) on part basement and ground floors, with residential (class C3) above, including demolition of the communication mobilising centre. Demolition of the brigade workshop/office buildings to the rear of the fire station. Construction of 7 new buildings ranging in height from 5 to 15 storeys for mixed use purposes, including residential dwellings (class C3); office/business space (class B1); ground floor units for shops, financial and professional services, restaurants and cafes, and/or drinking establishments (classes A1, A2, A3 and/or A4); and ancillary facilities. Refurbishment and internal alterations to the grade II listed drill tower associated with the new fire station. Construction of basements to provide servicing, parking, energy centre, plant and storage. Creation of areas of open space and alterations to the existing vehicular and pedestrian accesses and highway arrangements within and around the site.

The development would provide a total of 275 residential units, a 2,634 sqm fire station (GIA), 8,126 sqm of B1 class employment floorspace, 661 sqm of retail/A Class floorspace and 92 car parking spaces.

Applications received for planning permission (10/04473/FUL), listed building consent (10/04475/LB) and conservation area consent (10/04476/CON).

This application is a departure from the adopted Development Plan for the London Borough of Lambeth because it seeks to introduce a residential use into a designated KIBA.

This application is accompanied by an Environmental Statement (ES).

Applicant
Albert Embankment LLP _ London Fire And Emergency Planning Authority

Agent
DP9
100 Pall Mall London SW1Y 5NQ

Date valid
22 December 2010

Case Officer
Mr David Smith

Application Reference
10/04473/FUL

Recommendation(s)
Grant Planning Permission, Listed Building Consent and Conservation Area Consent for the development, subject to the
recommended conditions and to the s106 planning obligations set out within this report.

**Constraints**

Conservation Area  
Environment Agency Flood Zone  
Listed Building  
Archaeological Priority Areas  
B Cons Area - Parliament Hill to Westminster  
B Cons Area - Prim Hill to Pala of Westminster  
Central Activities Zone  
Thames Policy Area

**Advert Publication Date**  
26th August 2011

**Site Notice posted on**  
26th August 2011
Section 3 – Recommendation Report

1. Summary of Main Issues

1.1 The planning issues pertaining to this application are:

- The principle of introducing a residential led mixed use development onto the application sites, having particular regard to the development plan designations;
- The quantum and quality of the employment floorspace to be provided;
- Whether the mix, tenure split/distribution and quality of the residential accommodation to be provided would appropriately meet Lambeth’s housing needs and demands;
- The impact of the development upon heritage assets on the site and in the vicinity of the site;
- Whether the development would harm strategic views;
- Whether the development is of a sufficiently high quality of design; and
- Whether the development would impact unacceptably upon neighbouring amenity.

2. Site Description

2.1 The site comprises three separate parcels of land; hereafter referred to as the front site, the middle site and the rear site.

2.2 The ‘front site’ fronts onto Albert Embankment/the river (No. 8), at the junction with Black Prince Road and adjacent to the IMO building at 7 Albert Embankment. The site is known as the London Fire Brigade Headquarters and had, since its construction in 1937 until 2008 (when the London Fire Brigade relocated the majority of its functions from the site to modern offices in Southwark), served that purpose. The old head quarters is Grade II listed. The building is 9 storeys in height. The basement to second floors of the building are currently occupied by the Fire Brigade and utilised as an operational fire station, with the remainder of the floors that originally provided offices and purpose built accommodation for fire fighters now vacant. In the south east corner of the site is a three storey 1970s concrete building, which was a Communications Mobilising Centre. To the rear of the building is a yard and a separately listed drill tower (Grade II). The rear of the front site is bounded by Lambeth High Street.

2.3 The ‘middle site’ fronts on to Lambeth High Street to the west and is bound by Whitgift Street to the north, by South Bank House to the south and by the railway viaduct to the east (rear), within the arches of which there currently operates a commercial business. Southbank House is a Grade II listed office building. It was formerly the head office of the Lambeth Pottery works and it is an elongated building of 5 storeys, with set back attic and basement.

2.4 Beyond Southbank House is a recently constructed 17 storey tower (known as Salamanca Tower) containing commercial and live work units on lower levels and 43 flats above. On the opposite side of Salamanca Tower is the ‘Salamanca Square’ (also known as ‘Salamanca Place’) development, which comprises 14
storeys with commercial uses on the two lower levels and residential accommodation above. Block A fronts Albert Embankment, Block B towards Black Prince Road, whilst Block C lies further south on Salamanca Place. Further to the west is Wah Kwong House (10 Albert Embankment) which has planning permission for ‘demolition and rebuilding to provide for the erection of a 15 storey (including basement) apart-hotel together with restaurant and residential penthouse’ (planning application ref. 08/01136/FUL).

2.5 Planning permission was recently granted at appeal (September 2009) at 81 Black Prince Road for the redevelopment of the site involving the demolition of the existing building and the erection of a 23 storey building (including basement) to contain 1770m² (GEA) of commercial floorspace (flexible use B1 or A2) together with 101 self contained flats on the upper floors. If constructed, that building would be located between Salamanca Place and the railway viaduct.

2.6 To the north of the middle site is Whitgift House, beyond which is Lambeth High Street Recreation Ground.

2.7 The middle site currently contains a 4 storey building at the front, with 2 storey workshops behind running the length of Whitgift Street to the railway viaduct. The brigade workshop/office buildings fronting Lambeth High Street were constructed at the time of the headquarters building. The accommodation on the middle site is currently vacant having previously been occupied by the London Fire Brigade. When occupied the fire service used it for administrative functions, parking and maintenance of vehicles and storage.

2.8 The ‘rear site’ is located on the corner of Black Prince Road and Newport Street. The National Rail railway viaduct separates the middle and rear sites. The rear site currently comprises a hard standing. The rear site is bounded to the north by the former ‘Ragged School’ at 22 Newport Street – currently used as the Beaconsfield Art Gallery. To the east, beyond the rear site, is predominantly low rise residential accommodation.

2.9 The whole application site extends to a total area of approximately 1.26 hectares, with the front, middle and rear sites measuring some 0.52ha, 0.68ha and 0.06ha respectively. The site currently comprises buildings totalling approximately 21,116 sqm of floorspace.

2.10 The front and middle sites are located in the Albert Embankment Conservation Area and the rear site is located in the Vauxhall Gardens Conservation Area. On the opposite side of the River are the Grade II* listed Tate Britain and Grade II listed Millbank Tower, whilst further north, on the opposite side of the Grade II* listed Lambeth Bridge is the Palace of Westminster, a World Heritage Site. The lamp standards and public benches on the River Thames wall are grade II listed.

2.11 As identified within the development plan:
- The front and middle sites fall within the Central Activities Zone;
- The front and middle sites fall within the Thames Policy Area;
- The front, middle and rear sites fall within the Vauxhall Nine Elms Battersea Opportunity Area;
• The middle and rear sites fall within a Key Industrial and Business Area (KIBA);
• The front and middle sites are designated a Major Development Opportunity (MDO4);
• The front and middle sites fall within an Archaeological Priority Area;
• The sites fall within the ‘Background Areas’ of strategic views from Primrose Hill to the Palace of Westminster and from Parliament Hill to the Palace of Westminster;
• Albert Embankment forms part of the TfL Road Network; and
• Albert Embankment, Black Prince Road and Newport Street form part of the Lambeth Cycle Network.

2.12 The site is well served by public transport, being located in proximity to a number of bus routes and the Vauxhall Interchange. The site has a Public Transport Accessibility Level (PTAL) rating of 6.

3. Planning History

3.1 In January 2010, the council received a planning application (ref: 10/00318/FUL) and associated Listed Building Consent and Conservation Area Consent applications for:

“Refurbishment, reconstruction and extension to the grade II fire station to provide a new fire station and associated functions for the London Fire Brigade (sui generis) on part basement and ground floors, with residential (class C3) above, including demolition of the communication mobilising centre. Demolition of the brigade workshop/office buildings to the rear and construction of 7 new buildings ranging in height from 5 to 16 storeys for mixed use purposes, comprising residential (class C3); business (class B1) to include offices and studio workshops; shops, financial and professional services, restaurants and cafes, and drinking establishments (class A1, A2, A3, A4) and ancillary facilities. Refurbishment and internal alterations to the grade II listed drill tower associated with the new fire station. Construction of basements to provide servicing, parking, energy centre, plant and storage. Creation of areas of open space, and alterations to existing vehicular and pedestrian access and highway arrangements within and around the site. To provide a total of 360 residential units, 7,214sqm of commercial floorspace and 181 parking spaces including a 6 storey building on the corner of Black Prince Road and Newport Street.”

3.2 In April 2010 the council resolved to refer planning application 10/00318/FUL to the Mayor under Article 5 of the Mayor of London Order 2008 advising that the local planning authority proposed to refuse the application for the following reasons:

1. The proposed development of the middle and rear sites, by reason of the introduction of residential uses, represents inappropriate development within the Key Industrial and Business Area within which these parts of the application site are located. The development therefore would undermine the objectives of the development plan designation which explicitly safeguards land within Key Industrial and Business Areas but not within Mixed Use Employment Areas for
solely employment uses and would run contrary to Policy 22 of the London Borough of Lambeth’s Unitary Development Plan (2007).

2. Having regard to its location within the Albert Embankment, the proposed development of the front sites fails to provide an appropriate mix of uses or a significant element of employment generating floorspace, particularly at above ground floor level. The development would therefore conflict with Policy 58 of the London Borough of Lambeth’s Unitary Development Plan (2007) which seeks to retain/achieve a vital mix of uses within the Albert Embankment befitting of the area’s central location.

3. The development, by reason of the proposed alterations and extensions to 8 Albert Embankment, the introduction of building C, the height and width of building D and the scale and alignment of building B, would prove unacceptably harmful to the special architectural and historic interest and setting of the Grade II Listed 8 Albert Embankment and the Grade II Listed Drill Tower. Furthermore, given the positive contribution of those building to the existing townscape, the development would also prove harmful to the existing townscape, the special historic and architectural character of the Thames Policy Area and the character and appearance of the Albert Embankment Conservation Area. The development therefore fails against Policies 33, 36, 40, 41, 43, 45, 47 and 58 of the London Borough of Lambeth’s Unitary Development Plan (2007).

4. Building G would be noticeably higher than its immediate neighbours and as a result would be an overly dominant and incongruous addition to the street scene in this location. In particular its large bulk and mass would intrude and act as a barrier between the former Lambeth Ragged School and the rest of the Vauxhall Gardens conservation area to the detriment of the character and appearance of that conservation area. The development therefore would conflict with Policies 33 and 47 of the London Borough of Lambeth’s Unitary Development Plan (2007).

5. The submitted daylight, sunlight, overshadowing, light pollution and solar glare assessment fails to include sufficient information regarding the assumptions of room usage and size so as to assure that the development would not harm the residential amenity of neighbouring properties in Whitgift House, Black Prince Road and the upper floors of the Queens Head Public House by having an unacceptable impact upon the levels of daylighting to those properties. In the circumstances the Local Planning Authority can not be assured that the development would accord with Policy 33 of the London Borough of Lambeth’s Unitary development Plan (2007).

6. The application has failed to demonstrate effectively how surface water will be managed and does not therefore provide a suitable basis for assessment to be made of the surface water flood risks arising from the proposed development. In the absence of a detailed and satisfactory drainage strategy, the Local Planning Authority can not be assured that the development would accord with Policy 4a.14 of the London Plan and Policy 54 of the London Borough of Lambeth’s Unitary Development Plan (2007).
7. The proposed level of car parking does not accord with the Council’s policies of parking and traffic restraint, which seek to encourage lower car dependency, reduce traffic and air borne pollution and encourage a shift to sustainable modes of transport. The proposal is therefore contrary to Policy 14 of the London Borough of Lambeth’s Unitary Development Plan (2007).

8. The application contains insufficient information to allow a full assessment of the likely impact of the proposed development on the free-flow of traffic and the condition of highway safety on the surrounding highway network. In the circumstances the Local Planning Authority can not be assured that the development is compliant with Policies 9, 10 and 14 of the London Borough of Lambeth’s Unitary Development Plan (2007).

9. The application submissions have failed to include sufficient information to allow for the independent verification of the submitted affordable housing assessment. The application has therefore failed to demonstrate that the scheme would not be economically viable with a higher level of affordable housing. The provision of only 10% of affordable housing is therefore contrary to Policy 16 of the London Borough of Lambeth’s Unitary development Plan (2007).

10. In the absence of appropriate planning obligations under s106 of the Act, the application would fail to:

- Provide the maximum reasonable amount of affordable housing in perpetuity;
- Mitigate against the development’s potential impact upon local/community infrastructure;
- Include suitable transport mitigation as well as obligations towards local transport improvements in the Vauxhall/Albert Embankment Area and a payment in lieu of Cross rail for other regionally important transport infrastructure; and
- Include suitable commitment to the provision and ongoing monitoring of a travel plan.

In the circumstances the development would be contrary to policy 57 of the London Borough of Lambeth’s Unitary Development Plan (2007).

11. The development fails to include any designated child play space for children under 5. Furthermore, in the absence of a ‘Play Strategy’ of sufficient detail it is not possible to ascertain whether the proposal provides access to good quality designated play space for children of 5 years and over. As such the development fails against Policy 3D.13 of the London Plan and Policy 50 (i) of the London Borough of Lambeth’s Unitary Development Plan (2007).

3.3 In the event, the applicant withdrew application 10/00318/FUL (and the associated Listed Building Consent and Conservation area Consent applications) before the Mayor could respond/direct and thus before the council could issue a decision.

4. Scheme Details

4.1 The development proposes:
Front Site:

i. The demolition of the existing 1970s three storey rear extension to the Grade II listed frontage building (building A);

ii. A rear infill extension of building A from fourth to tenth levels between the end projecting ranges, constructed in brickwork similar to the existing brick facing, so as to increase the depth of the floor plates at these levels;

iii. The erection of a single storey glazed roof top extension, necessitating the demolition of the two side pavilion’s on the existing roof and the need to extend upward the existing secondary roof elements to each end of the façade (containing lift over-runs);

iv. A range of internal alterations of building A to facilitate the new proposed residential use;

v. The erection of a building B, extending from building A at ground floor level but set away at the upper levels, measuring 8 storeys at the corner of Black Prince Road and Lambeth High Street and stepping down to five storeys further along Lambeth High Street;

vi. The erection of building C, a single storey building linking into building A and located along the northern boundary of the site, adjacent to the IMO building but set back from Albert Embankment;

vii. The provision of a first floor podium covering part of the fire station yard/wash down area and connecting buildings A and B;

viii. The provision of a basement level across the site to provide car parking and space for plant machinery;

ix. The retention and refurbishment of the existing Grade II listed Drill Tower;

x. The retention and relocation of the obelisk within the development (exact details of such to be secured by condition);

xi. The front site would provide the fire station and ancillary facilities at the ground floor levels of buildings A, B and C, a ‘retail unit’ at ground floor within building B overlooking Lambeth High Street, and residential on the upper floors. The fire brigade would continue to have use of the drill tower for training purposes and would be provided with a wash down area and yard to meet their functional requirements;

Middle Site:

xii. The demolition of the workshop/office buildings;

xiii. The erection of a 15 storey building (building D) across the front/east of the site containing active frontage uses at ground floor and residential above;

xiv. The erection of a five storey building (building E(S)) along the southern side of the site to contain employment (Class B1) uses;

xv. The erection of a five storey building (building E(N)) along the northern arm of the site, presenting directly to Whitgift Street and containing employment uses (B1) at ground floor and residential above;

xvi. The erection of building F, a 13 storey building along the eastern side of the site adjacent to the railway viaduct and containing employment uses (B1) at ground to 7th floor levels and residential above;
xvii. The provision of a first floor podium, centrally located and enclosed by the buildings, to provide an external communal amenity space for the development and to cover the car parking activities occurring at ground floor beneath;

xviii. The provision of one level of basement accommodation to provide further car parking and space for mechanical plant;

Rear Site:

xix. The erection of a flat roofed, five storey residential block (building G);

Public Realm:

xx. The extension and improvement of the public realm between the front and middle sites through the provision of a new public ‘piazza’ at the southern end of Lambeth High Street, directly fronted by the ground floor active frontage uses (A1, A2, A3 and/or A4) of buildings D and B. It is proposed that landscaping and traffic calming measures be introduced into this area, with flush kerbs to Lambeth High Street to create a shared pedestrian and vehicular surface.

4.2 The buildings and application sites as referenced are as set out in the diagram below:

![Diagram of site layout](image)

4.3 For the avoidance of doubt, the schedule of works proposed to the existing Grade II listed fire station building, and for which listed building consent is sought, are as follows:
i. The glazed roof extension and associated alterations to the existing secondary roof elements to each end of the façade (containing lift over-runs);

ii. The rear infill extension at levels 4 to 10;

iii. The provision of the first floor podium;

iv. The linking of buildings B and C to the building;

v. 28 original window openings on the remaining part of the rear elevation would be altered / replaced to suit the new internal layouts;

vi. The southern entrance lobby (containing the memorials) is to be truncated and subdivided. The form and layout is largely as built. A glazed screen is proposed between the central and south bays, cutting through the centre of the space across the existing ceiling. A memorial is to be moved to provide a backdrop to the new reception desk. New doors are to be created in the vestibule to serve a refuse store;

vii. In the appliance bay, all 3 poles are removed and the central and end bays enclosed to form rooms;

viii. The southern appliance bay is widened south taking some of the former foyer space;

ix. It is proposed to demolish the south wall of the north foyer and enlarge it substantially - affecting the room shape, coving and cornices - and again new doors are created in the vestibule to serve a refuse store;

x. The upper floors are essentially gutted and completely remodelled.

xi. The externally articulated pole shaft is absorbed into the extension.

xii. The first floor recreation room will remain.

4.4 For note, the latest application submissions show the retention of the second floor control and command room. This room is served by three French windows with side lights. The room is rectangular in plan having two French windows onto the terrace and two normal windows. The room is formal, architecturally understated and carefully considered with full-height walnut panelling and moderne style cornice to the ceiling. Interestingly the room is heated by flush radiators which are integrated flush into the panelling and grained to match the timber – which Lambeth Officers believe to be original. Whilst shown for retention, there is at this time no information submitted as to the intended use of this room/space.

4.5 The external facades of the building would be cleaned and the stonework repaired where necessary. At ground floor level the existing memorials will remain largely in situ, although one would be relocated.

4.6 The fire station would continue to operate largely as it does currently; with vehicular ingress and egress from Lambeth High Street and Albert Embankment respectively. The development would however include the creation of ground floor pedestrian entrance for the fire station on the south flank of the building.

4.7 The design of the new buildings relate to each other in terms of architectural language, facades and materials. A limited palette of materials is proposed including brick, glass, metal and stone/masonry.
4.8 The development would provide the following levels of Gross Internal Floorspace (all measurements in sqm):

<table>
<thead>
<tr>
<th>Building</th>
<th>Fire Station</th>
<th>Residential (C3)</th>
<th>Retail / Food and Drink Uses (A1/A2/A3/A4)</th>
<th>Business (B1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>2,634</td>
<td>7,160</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>B</td>
<td>2,452</td>
<td>84</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>C</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>D</td>
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<td>10,617</td>
<td>578</td>
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</tr>
<tr>
<td>E(N)</td>
<td>0</td>
<td>1,421</td>
<td>0</td>
<td>338</td>
</tr>
<tr>
<td>E(S)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1,635</td>
</tr>
<tr>
<td>F</td>
<td>0</td>
<td>4,609</td>
<td>0</td>
<td>6,153</td>
</tr>
<tr>
<td>G</td>
<td>0</td>
<td>1,210</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total</td>
<td>2,634</td>
<td>27,469</td>
<td>661</td>
<td>8,126</td>
</tr>
</tbody>
</table>

4.9 A total of 275 residential units are proposed. The development would comprise 256 market units and 19 affordable units – of which 10 would be provided as social rent units and 9 as intermediate housing. 7% of the units therefore would be provided as affordable housing. Building G would house all of the social rent units, whilst the intermediate units would be provided at floors one and two of building E(N). The residential unit size and tenure mix is as follows:

<table>
<thead>
<tr>
<th>Building</th>
<th>Tenure</th>
<th>Studio</th>
<th>1 bed</th>
<th>2 bed</th>
<th>3 bed</th>
<th>Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Market</td>
<td>6</td>
<td>10</td>
<td>35</td>
<td>9</td>
<td>60</td>
</tr>
<tr>
<td>B</td>
<td>Market</td>
<td>18</td>
<td>10</td>
<td>1</td>
<td>29</td>
<td></td>
</tr>
<tr>
<td>D</td>
<td>Market</td>
<td>62</td>
<td>32</td>
<td>23</td>
<td>117</td>
<td></td>
</tr>
<tr>
<td>E(N)</td>
<td>Market</td>
<td>6</td>
<td>2</td>
<td>2</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>E(N)</td>
<td>Intermediate</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>9</td>
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<td>F</td>
<td>Market</td>
<td>12</td>
<td>15</td>
<td>13</td>
<td>40</td>
<td></td>
</tr>
<tr>
<td>G</td>
<td>Social Rent</td>
<td>2</td>
<td>1</td>
<td>7</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td>6</td>
<td>113</td>
<td>98</td>
<td>58</td>
<td>275</td>
</tr>
</tbody>
</table>

4.10 The front site would be provided with a basement level to provide parking and space for plant machinery. On the middle site parking and space for plant machinery would be provided centrally within the site at ground floor level below the first floor podium and at basement level. The basement levels of the front and middle sites would be accessed by car lifts from Lambeth High Street and Whitgift Street respectively. An overall provision would be made for 92 car parking spaces (comprising of 21 car parking spaces associated with the fire station, 69 for the residential units and 2 disabled spaces for the commercial uses), 61 motorcycle spaces and 379 cycle spaces.

4.11 A service route would be provided through the middle site between building E(S) and Southbank House. The service route would adopt a ‘home zone’ approach, such that the ‘street’ space is shared between pedestrians and vehicles.
Dedicated refuse storage arrangements would also be provided at ground and basement levels.

4.12 The application is a Departure to Development Plan Policy, as will be set out hereafter.

4.13 The application is also an EIA application and is accompanied by an Environmental Statement.

4.14 Listed Building Consent application 10/04475/LB and Conservation Area Consent application 10/04476/CON relate to the works sought under the planning application. Those applications are also presented here for the Committee's determination.

5. Consultation Responses

5.1 Letters were sent to 998 neighbouring property addresses in the vicinity of site.

5.2 The application was also advertised by way of site notices and a press advert.

5.3 The following local interest groups were notified:

   9 Albert Embankment Residents Association

   No response at time of writing

   Vauxhall Society

   No response at time of writing

   Kennington Association

   On balance, they think that material considerations justify a departure from the Development Plan and they invite the Planning Committee to agree the application, subject to the provision of on-site children's play space.

   Manor of Kennington Association

   No response at time of writing

   Association of Waterloo Groups

   No response at time of writing

   Waterloo Community Development Group

   Makes no comment at this time.

   Salamanca Place Residents Association
No response at time of writing

**Vision for Vauxhall**

No response at time of writing

**Kennington, Oval and Vauxhall Forum**

No response at time of writing

**Friends of Lambeth High Street Recreation Ground**

Loss of Amenities and overshadowing - The two towers are so tall they will cause considerable shadowing on the park from midday to early evening. This is particularly bad outside of the summer months. At the moment the Park is undergoing redevelopment and redesign partly to increase the amount of sunlight at ground level, through thinning and replanting of trees. The height and shadow cast from the two tall towers will completely negate any positive effect the design would achieve. It appears that no study has been carried out on the loss of amenity in the park. The park serves the surrounding council blocks effectively as a garden. It is, therefore, serious that not only will Whitgift House lose daylight into the building but the residents will also lose daylight in their park.

Looking at the developer's data analysis conclusions contained within the Environmental Statement, Non-Technical Summary, page twelve, it is clear that they are totally at odds with the Lambeth Council Assessment of Daylight and sunlight Report and must therefore be ignored. There is no mention in this report of the effect of overshadowing of the Park, only the local build. The data produced re shadowing into Whitgift house has not been obtained by visiting any of the flats to be affected.

Ecology, The "desk-based" data search has not included any effects the demolition will have on the Park.

Design & Conservation - The development on the workshop site is totally out of scale with the surrounding buildings within a conservation area. It is contrary to Lambeth's planning policy and the development would fail to preserve the special architectural and historic interest of the listed Fire Brigade headquarters and the Doulton Building.

Cumulative Impacts - Having to use electric light for much of the day within Whitgift where there are old and vulnerable people will be detrimental to their health and pocket. The number of vehicle parking spaces proposed within the development will affect air quality and is contrary to the drive to get more people out of cars. The data put forward regarding the availability of public transport in the area is suspect.

### 5.4 Neighbour Responses

<table>
<thead>
<tr>
<th>No. Letters sent</th>
<th>No. of Objections</th>
<th>No. in support</th>
<th>No. of comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>998</td>
<td>96</td>
<td>4</td>
<td>3</td>
</tr>
</tbody>
</table>
## 5.5 Assessment

<table>
<thead>
<tr>
<th>Objections/Comments</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Land Use &amp; Housing</strong></td>
<td>The development would fail against the council’s own policies for the provision of employment.</td>
</tr>
<tr>
<td>The development would fail against the council’s own policies for the provision of employment.</td>
<td>As set out at section 7.1 of this report, officers accept that the development is a departure from the KIBA policy of the development plan but are of the opinion that the proposed quantum and mix of uses across the site, including the proposed amount of employment generating floorspace, are of sufficient justification to enable the positive determination of the application other than in accordance with development plan policies.</td>
</tr>
<tr>
<td>There are already a number of empty buildings on Albert Embankment. Building another is unreasonable as it would not likely be used either and in turn will turn away potential investors in the area.</td>
<td>The applicant has sought to maximise the employment floorspace provision of the development in direct response to the local policy KIBA designation of the rear site. As advised by the council’s planning policy team, the Council’s Core Strategy evidence base (DTZ studies) and neighbouring examples (such as Southbank House which has low vacancy rates) show that there is no shortage in the demand for affordable premises for the needs of Small and Medium sized Enterprises (SMEs), both at a Borough and London wide level.</td>
</tr>
<tr>
<td>It would fail against Lambeth’s policies on social housing provision.</td>
<td>Core Strategy Policy S2 sets out that the levels of affordable housing will be subject, where relevant, to independently validated evidence of viability. On the basis of the types and quantum of uses proposed for the site, the maximum viable quantum of affordable housing is proposed. A demand for additional affordable housing would, at the present time, render the scheme unviable which would mean that in all probability it would not go ahead.</td>
</tr>
<tr>
<td>Impact upon heritage assets, including the special character and setting of the fire brigade headquarters.</td>
<td>As set out at section 7.4 of this report, officers acknowledge that the development would prove harmful to the special interest and setting of the Grade II listed 8 Albert Embankment. In addition, The roof extension would destroy the original roof-line and silhouette which are key features of the architectural character of the building.</td>
</tr>
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</table>
- The proposed fifteen storey slab-block is excessively tall and bulky. It would tower above the fire brigade headquarters, drill tower and the adjoining south bank house.
- The landmark value of the fire brigade headquarters would be seriously damaged by the extensions and new buildings to the rear, which would dominate views from across the river, from the bridges and from Albert Embankment itself.
- The rear extension would completely alter the appearance of the rear elevation, filling in the original balconies that are a distinctive feature of London fire station architecture.
- The development (building B) would block views of South Bank House from Albert Embankment.
- The development would seriously damage the character and appearance of the Conservation Areas.

### General Design Comments

- This is an excessive scale and density of development.
- The roof extension and built-up back drop would worsen the wall-like effect of the buildings along Albert Embankment.
- The site to the rear of the fire station is unsuitable for a tall building as defined by the council’s policy on tall buildings.
- This is an incongruous poor design.
- The development would intrude into river side views.
- The public space between buildings B and D will be poorly lit, unpleasant and of little public benefit.

Setting aside the heritage issues, the proposed scale and form of the development together with its detailed design and use of materials is considered to be of quality. As such, the development is considered acceptable in all other design respects – see section 7.4 of this report for further detail and assessment.

### Residential Quality

- Residential units should be located away from railway lines.

Whilst the proximity of the railway line and the levels of natural lighting to the
• The lower floors of the development would suffer from lack of daylight and sunlight.

lower residential dwellings of the front and middle sites are noted, officers are of the opinion that these matters do not weigh significantly against the development so as to warrant refusal. Moreover, a condition governing the sound insulation performance of windows is proposed. Further detail is included at section 7.3 of this report.

Neighbouring Amenity

• Loss of daylight and sunlight to neighbouring properties – particularly Whitgift House. The submitted daylight/sunlight assessment shows significant impacts to neighbouring properties.

The daylight and sunlight impacts of the development have been independently verified by GL Hearn, who express an opinion that the impact of the proposed development upon surrounding residential properties is on the whole acceptable given the urban location of the site. Officers accept GL Hearn’s advice, having regard also to the nature of development envisaged to come forward in this part of the opportunity area and to the other planning benefits that would be derived from the scheme were it implemented (see section 7.6 of this report).

• Overshadowing of Whitgift House

• The advice issued by GL Hearn [the council appointed independent verifiers of the ES daylight/sunlight report] is an expressed opinion only. Not all parts of central London are the same. This area is a low rise characterised by its heritage assets.

The proximate relationships between the proposed buildings and the neighbouring residences are reflective of the established urban grain of the vicinity and the high density occupation of this central London location. Where such proximate relationships are an accepted feature of central London locations, it is considered that the impact of the development upon the privacy and outlook of the neighbouring properties could not be substantiated as a reason for refusal. It is also the case that views from private residences across another property are not afforded any protection within the development plan policies.

• The excessive scale of development would overbear neighbours.

• Loss of privacy to neighbouring properties.

• The development would block out the current roof scape and Southbank House views from Whitgift House.

• Impact upon views of the city from 9 Albert Embankment

• Increases in noise and noise nuisance resultant from this high density development.

The introduction of restaurants and drinking establishments on the doorstep of a largely residential area will increase noise and disturbances out of hours.

The proposed active frontage uses, including potential A3/A4 proposed food and drink use, are appropriate in this location given its position within the central activities zone and the policy objectives of MDO4 to re-animate this part of Lambeth High Street. Where an end user has not been identified at this
<table>
<thead>
<tr>
<th>Impacts during construction would harm residential amenity during that period.</th>
<th>It is inevitable that there would be an element of noise, disturbance and inconvenience during the construction period. Notwithstanding, such matter would be controlled, as far as is practicable, by way of the recommended planning conditions.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Transport</strong></td>
<td>The site has a PTAL rating of 6a and as such only 92 car parking spaces are proposed, which it is considered would not prejudice the free flow of traffic in the vicinity nor harm vehicular and/or pedestrian safety. Lambeth officers conclude that subject to conditions and the package of s106 obligations, the development would suitably accord with all transport related policies of the development plan – see section 7.12 of this report.</td>
</tr>
<tr>
<td>- Increased traffic congestion</td>
<td></td>
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<tr>
<td>- Increased traffic may cause more accidents.</td>
<td></td>
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<tr>
<td>- Lambeth High Street is too narrow to facilitate this kind of development – including two way vehicular movements and potential servicing requirements.</td>
<td></td>
</tr>
<tr>
<td>- Increased on street parking in the area</td>
<td></td>
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<tr>
<td>- The small streets in the area will not cope with drivers, deliveries, drop offs, cyclists, residents, office workers and commuters.</td>
<td></td>
</tr>
<tr>
<td><strong>Other Objections</strong></td>
<td>1. The application site is located within a Major Development Opportunity within the VNEB Opportunity Area. The planning context therefore is permissive of new development which seeks to optimise residential and non-residential output and densities.</td>
</tr>
<tr>
<td>1. If the existing buildings were brought back into use, there would be less damage for the environment. More importantly, people in the area would not suffer from the noise and dust which would be brought about by the moment in time, conditions of consent could reasonably be imposed regarding hours of operation and management measures so as to minimize potential impacts.</td>
<td></td>
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</table>
2. There are existing problems with drainage in the area which will be made worse by these new developments.
3. The building works would last for years, impacting upon the quiet enjoyment of neighbouring residences.

4. The development would contravene rights to light of neighbouring properties.
5. The development would devalue the surrounding area and neighbouring properties.

6. Increase in noise pollution.
7. The large increase in residents and the scale of development would destroy what is a small, peaceful community.

2. Thames Water and the Environment Agency have assessed the application and raise no objections to the scheme with regards to its impact upon the drainage and sewerage infrastructure.
3. Whilst there would inevitably be a degree of disturbance to local residents during the construction period, the short term harm would be outweighed by the longer term planning and community benefits of the development. A construction management plan would be required by condition so as to minimise such harmful impacts as far as is practicable.
4. Rights to light are a matter dealt with under alternative legislation and are not a planning consideration.
5. The potential devaluation of individual surrounding properties is not a matter that would weigh substantially against the wider planning and community benefits of the development.
6. & 7. Whilst the development would inevitably increase the local population in the vicinity, it is the case that the application site and its surrounds have been identified at a strategic level as an opportunity area where residential and non-residential output and densities are expected to be optimised. There is no evidence to suggest that future residents and users of the development would be the source of unacceptable levels of noise. Furthermore, it is inevitably the case that the community as it currently exists will be altered by the scale and quantum of development envisaged for the VNEB OAPF area.

Support

- Welcomes all elements of the development and looks forward to its implementation.
- The development would bring extensive regeneration benefits to a desolate and deprived area.
- It will enhance the neighbourhood through shops and restaurants which this part of Lambeth lacks.

Comments are noted. The matters are largely addressed within the main body of this recommendation report. No further officer comment required here.
- The development will generate jobs, council tax and bring life to an area that is quite dead most of the time.
- There is already extensive provision for social housing locally hence the proposed level of social housing in this development is entirely appropriate.

**General Comments**

1. We trust that matters of security, site access, loss of daylight/sunlight, dust noise etc will be addressed in accordance with the relevant legislation and to maintain neighbourly relations.
2. Lambeth has a duty to protect its residents and to protect its local heritage.
3. The lowering of natural light into neighbouring properties will result in increased heating and lighting costs for those properties.
4. What is the point of listing a building if it is not then afforded the utmost protection?
5. Further information is requested with regards to the construction arrangements of the development and these should not harm local amenity.
6. Assurance is sought that the development will not adversely effect the utility supplies in this area.
7. It is hoped that some of the proceeds of the development would go towards cleaning up the streetscape, e.g. by planting trees, improving green spaces, etc.

| 5.6 | The following consultations with bodies external to the Council have been undertaken and their responses are summarised as follows: |
| 1. These matters have been fully assessed by officers – see assessment; |
| 2. Agreed. Lambeth has a duty to provide regeneration, jobs and new housing for its residents also. In this context officers consider that these benefits outweigh these particular concerns. |
| 3. Officers accept that this may potentially be the case. |
| 4. Officers consider that in this specific instance the proposed development would offer sufficient planning and community benefits and that any harm to the heritage assets identified is not of such weight as to justify refusal of the scheme – see section 7.4 of this report. |
| 5. Such information would be secured as part of the condition requiring the submission (and operation thereafter) of the construction management plan. |
| 6. There is no evidence to suggest that the development would impact unacceptably upon existing utility services. |
| 7. The development would be inclusive of a full package of s106 mitigation measures – see section 7.14 of this report. |

20
CABE

“We find much to admire in this proposal and we commend the careful treatment of the listed fire brigade building, the position and orientation of the slab blocks and the overall architectural approach. This is an interesting proposal that has the potential for reanimating Lambeth High Street. The internal organisation and the mix of accommodation could benefit from further refinement.

The proposed diagram appears sound. We welcome the layout of the buildings and the position and orientation of the slab blocks and think that they establish a clear order which works well in the local context and does not impact on the setting of the listed building.

For the success of the scheme, it will be crucial to animate the ground floor spaces and to create a welcoming and vibrant public space. We think that the proposed triangular place which opens up Lambeth High Street has the potential to achieve this, but the local authority needs to ensure themselves that thorough sun and wind studies prove the quality of these spaces and that sufficient amenity space is provided.

We welcome the fact that this fine building is to be brought back to life and we think that turning the fire brigade into residential accommodation could work successfully. While the ziggurat section and the viewing galleries make this building special, we think that, provided the original character is still legible and the rich detailing of the building is preserved, this proposal has the potential to create an exciting symbiosis of old and new elements. The glass top, for example, seems to work with the building. For this scheme in particular, intelligent detailing and carefully developed interfaces between new and existing fabric are very important.

We would like to see a higher level of subtlety and variety for the internal organisation of this project. We think that the local authority needs to ensure themselves that the long corridors of Building D and F, the dominance of small, single aspect units and the amount and quality of amenity space do not diminish the overall quality of the proposal. We question whether the width of the gap between the two slab blocks and the lower wings is sufficient in terms of views, privacy and daylight. We expect that the local authority has ensured themselves that noise from the adjacent railway line does not compromise the scheme.

The quality of the design and the landscape treatment should be protected throughout the planning and construction process and we suggest prescribing the phasing and procurement process at an early stage”.

English Heritage

“We have significant concerns with regards these proposals and their impact upon both the fabric of the Listed Building, its setting, and the surrounding conservation areas.

Rooftop extension
The river-facing elevation of 8 Albert Embankment is a series of stacked horizontal forms, with the upper storeys stepping back from the edge in a carefully-considered geometric composition. The central 5 bays of eighth storey remain flush with the building line, thus forming a centrepiece to the façade. The aesthetic significance of this central section as the tallest element of the building - will be undermined by the proposed rooftop extension, which will exceed it in height.

The central element of 8 Albert Embankment is topped with a bold cornice and sculptural relief and designed to be read as the building’s crown. However, under the proposals the central element would become subservient to extended stair towers at either end of the roof and subsumed into the linking glazed walls of the proposed rooftop extension. As existing, the uppermost elements of the two stair towers contribute to the composition of the building’s rooftop elements as subordinate flanking structures to the central section. As well as undermining the aesthetic value of the central element, the proposed increased height of the existing stair towers will also result in a disproportionately top-heavy appearance to the towers; at odds with the general aesthetic of elements receding in size at the building’s upper levels.

We consider that the proposed rooftop extension will strongly undermine the architectural form and composition of the listed building, and urge the applicant to reconsider this aspect of the proposals.

Proposed extensions to the rear of the building
At the rear of the building, a series of balconies and walkways provide access to upper level accommodation. On the lower floors these are wide structures which were also designed to function as viewing galleries towards the area below, which was once used as a parade ground. Above fourth floor level, the floorplate of the building is reduced into a ‘u-shape’ with the wide central section flanked by wings at either end which incorporate stair towers. Much of the upper levels of the building were formerly domestic quarters for live-in employees of the fire brigade.

The applicant is seeking to infill the ‘u-shape’ at upper levels by providing a large rear extension to the building, where most existing internal walls will also be removed to create a new residential floorplan. The proposed new rear elevation at these upper levels would use brickwork and fenestration to reflect the existing, with the existing external pole tower retained but becoming an internal feature within the residential accommodation. A new-build reinterpretation of the pole tower would be constructed as a design feature on the proposed rear elevation.

English Heritage regrets that we find little to commend in this element of the proposals. Although the principle internal interest in the building lies in the entrance halls and higher-status spaces of the lower floors, the former domestic quarters of the upper floors are not without significance. The narrow, stepping-in forms of the upper levels contribute to the special interest of the listed building and these would be lost under the proposals. The appearance of the building’s rear elevation will be fundamentally changed; from a carefully-considered series of stepped forms which recede in depth as they rise, to an elevation of monotonous regularity flanked by the previously-mentioned top-heavy forms of the extended stair towers.
At upper levels the proposals to remove the existing balconies and most of the internal walls verges on façade retention and will harm the special interest of the listed building.

Proposed Building fronting Lambeth High Street

It is essential that views of 8 Albert Embankment from the Victoria Embankment on the opposite side of the River Thames are considered as part of the application, as the stepped elevations and form of the building can be clearly appreciated from these wider viewpoints. It is for this reason we object to the proposed height of the buildings on the ‘middle site’ fronting Lambeth High Street. The uppermost floors of these proposed buildings rise above 8 Albert Embankment, compromising the symmetry of the building’s composition and its monumental appearance. In our view, the height of the proposed buildings on the ‘middle site’ should not rise above the roofline of 8 Albert Embankment in views from the opposite bank of the River Thames.

We are aware of the existing planning approval for a tall building at 81 Black Prince Road, adjacent to the site. If built, this building would rise above the roofline of 8 Albert Embankment in oblique views from the Victoria Embankment towards Lambeth Bridge. The proposed building at 81 Black Prince Road would not, however, affect the composition and silhouette of 8 Albert Embankment in the on-axis view from across the river in which its symmetry is best appreciated. Paragraph HE9.1 of PPS5 states that the significance of a heritage asset can be harmed or lost through development within its setting.

The buildings on the middle site offer an opportunity to re-animate the historic thoroughfare of Lambeth High Street, the significance of which was much reduced by wartime damage and post-war reconstruction. For this reason, we feel the interaction between this building and Lambeth High Street could benefit from improvement. Given the proposed height of the building, it is understandable that the applicants have chosen to set it back from the street in order to minimise its impact on the setting of the Grade II Listed former Doulton headquarters when viewed at the junction with Black Prince Road. However, this has resulted in the North-facing elevation of the building gaining prominence in views from the North when approaching the site down Lambeth High Street. The large areas of unrelieved masonry to the proposed side elevation, result in a blank appearance in views towards the site from the Lambeth Palace Conservation Area at the Northern end of Lambeth High Street. We feel further design consideration should be given to this element of the proposals, which at present fails to preserve or enhance the setting of the Lambeth Palace Conservation Area.

English Heritage therefore objects to these proposals for the following reasons:

- The proposed rooftop extensions will cause substantial harm to the special interest of the Grade II Listed Building. Any benefits brought by the proposals do not outweigh this harm.
- Harm will be caused to the special interest of the Listed Building by the proposed rear extension and removal of internal walls.
- The proposed 15-storey building fronting Lambeth High Street will cause harm the setting of the 8 Albert Embankment, compromising its symmetrical
composition and unadulterated silhouette.

8 Albert Embankment is a strongly positive contributor to the Albert Embankment Conservation Area, and the significance of the conservation area will also be harmed by the proposed 15-storey building fronting Lambeth High Street and its effect on 8 Albert Embankment.

The proposed building fronting Lambeth High Street will cause harm to the setting of Lambeth Palace Conservation Area in views South down Lambeth Palace Road.

We suggest that your council negotiates with the applicant to secure improvements to the proposed development. These improvements should include removal of the proposed rooftop extension to the Listed Building, and reconsideration of the proposed rear extension. The proposed building fronting Lambeth High Street should be reduced in height to the point it does not appear above the rooftop of 8 Albert Embankment, and further consideration should be given to how this building addresses the Lambeth Palace Conservation Area.

We acknowledge that improvements have been made to these proposals since the previous application made in 2010, and later withdrawn. In particular we are pleased to note the preserved relationship between the practice tower and 8 Albert Embankment in wider views. At present however, we are unlikely to be able to support these proposals without the substantial revisions outlined above.

[In response to the revisions] In relation to the above points, the applicant has amended the proposals to reduce the width of the proposed rooftop extension.

We do not consider the amendments address our concerns, and the points of objection raised in our letter of 8 March 2011 still stand.

Despite the reduction in width to the proposed rooftop extension, it does not sympathetically respond to the geometric composition of the listed building. While the greater degree of margin either side of the building reflects the diminishing width of the existing upper floors, the proposed rooftop extension fails to step back from the front edge of the building by the same proportion as the floors beneath. This results in a top-heavy appearance at odds with the carefully-considered composition. The lack of an appropriate set-back from the parapet also diminishes the aesthetic significance of the tallest central section, designed to be read as the crown of the building.

The reduction in width to the proposed rooftop extension also has the side effect of giving additional prominence to the proposed stair tower extensions, which were cited as a cause for concern in our previous letter. The existing height of the stair towers and their flanking of the central section is an essential element in the geometric composition of the building.

We also continue to be of the view that building D is too high, and the proposed reduction in height of 1 metre is almost inconsequential on a 15-storey building. The positioning of building D directly behind the listed fire station in views from the River Thames will detract from the fire station's distinctive silhouette.
We also consider the proposed revisions to the Lambeth High Street elevation of building D a retrograde step in design terms. The previous proposal acknowledged the scale of the adjacent (grade 2 listed) Doulton factory through a different facadial treatment below the height of the Doulton building’s eaves line. This has been removed from the amended proposal, and the potential visual relationship between building D and the former Doulton factory is diminished as a result.

We continue to object to these proposals, which we consider to cause substantial harm to the significance of 8 Albert Embankment. We also consider the proposals harm the setting of 8 Albert Embankment, the setting of the Albert Embankment Conservation Area, the setting of the former Doulton factory and the setting of Lambeth Palace Conservation Area. All of the points of objection repeated at the beginning of this letter continue to stand.

Policy HE7.4 of PPS5 notes that local authorities should take into account the desirability and enhancing the significance of heritage assets and of utilising their positive role in place-shaping. We strongly encourage you to negotiate for a solution at 8 Albert Embankment and the land associated with it for a solution that meets the requirements of policy HE7.4. This proposal does not.

Policy HE9.1 notes that the significance of a designated heritage asset can be lost through alteration and development within its setting, and that any loss should require clear and convincing justification. In accordance with policy HE9.2, when an application will head to substantial harm, local planning authorities should refuse consent unless it can be demonstrated that the substantial harm is necessary to deliver substantial public benefits that outweigh the harm. We do not consider that the benefits of the proposals outweigh the substantial harm to this unique heritage asset”.

**English Heritage (Archaeology)**

No objection, subject to imposition of certain conditions.

**Environment Agency**

No objection, subject to the imposition of conditions to protect the position with regards to flood risk and to the protection of groundwater and management of contaminated land.

**GLA**

In their Stage I response, the Deputy Mayor advised that:

The application does not comply with the London Plan but that possible remedies could address these deficiencies.

The principle of the re-provision of a state of the art fire station and residential led mixed use redevelopment within the CAZ and the VNEB OAPF is consistent with London Plan policy.
In the absence of sight of the viability assessment the Deputy Mayor was unable to verify if the maximum reasonable amount of affordable housing is being provided. In addition, the housing mix and tenure are also inconsistent with strategic planning guidance. Further information is requested in this regard and review mechanisms for securing phased viability assessments should be discussed before the application is referred back to the Mayor.

It is considered that the application fails to demonstrate an exemplar development so as to justify such a high density. The applicant should address issues raised with regard to design, residential quality and playspace in order to provide a rationale for such a high density.

The proposal, by reason of the heights of buildings D and F, is inconsistent with London Plan policy. Further reductions to the heights of buildings D and F are required to provide deference to building A. In addition, further information regarding the single aspect units is requested.

The proposal provides no on-site children’s playspace for children under 5. The development should provide at least 330sqm of such and further information should be provided in relation to the capacity of surrounding playspace for older children before the application is reported back.

Further details of how the development would comply with London Plan policies with regards to lifetime homes and wheelchair accessible units is sought.

The applicant has broadly followed the Mayor’s energy hierarchy, although further clarification is sought on the energy efficient measures and district heating.

The development is compliant with London Plan policy in terms of climate change adaption.

TfL has a number of concerns about the development in relation to car parking, servicing, pedestrian movement and facilities required the make the travel plan acceptable. Further discussions are also required with regards to mitigation measures and contributions towards local and regionally strategic transport improvements.

Transport for London

“The 158 spaces proposed to serve the 293 residential units equates to 0.54 spaces per unit. This level of residential parking is deemed as excessive particularly in relation to the high public transport accessibility level (PTAL 6a), the Central London location and levels of traffic and congestion on surrounding roads. [NB: the applicant has now reduced the residential parking down to the OAPF 0.25 maximum parking ratio].

It is essential that TfL and the council are fully consulted on the detailed design of the landscaping proposals, in particular the section fronting on to Albert Embankment.
The applicant will be required to enter into a Section 278 agreement for any proposed works on the highway for which TfL is the highway authority, including works to the footway on Albert Embankment.

In order to accord with London Plan policy and to improve way finding from the development to the surrounding area, a contribution towards improving off-site pedestrian and public realm improvements will be expected as part of the wider transport contribution.

Where possible TfL prefers all servicing activities to take place ‘off-street’. Further evidence is required to demonstrate that no other options exist but to service the front and rear sites ‘on-street’, and the middle site using the central ‘public space’ as proposed. In addition the applicant is expected to ensure that any ‘off-site’ mitigation measures are provided to enable servicing to take place in a safe and efficient manner.

A framework travel plan has been submitted and reviewed; this has passed the ATTrBuTE test which is welcomed however further work on objectives, measures and budget and funding is required before the plan can be deemed to be acceptable. A car parking management plan should also be included. The travel plan assessment, which identifies required improvements, will be forwarded to the applicant. The travel plan must be secured, enforced, monitored, reviewed and funded through the Section 106 agreement.

TfL expects a significant contribution towards strategic transport improvements. The scale of this contribution must reflect the levels set out in the draft Section 106 Chapter (Feb 2011) and supporting VNEB Development Infrastructure Funding Study (Oct 2010). Further discussions between the applicant, Council, GLA and TfL are required”.

City of Westminster

The glass extensions to the headquarters building and the height of building D and to a lesser extent building F are considered to harm the character and appearance and the setting of the listed building; harm the views of this building from Westminster; and as a consequence harm the setting of the conservation areas from where the development can be seen. Any roof top extension of the building should be resisted in principle and the heights of the buildings behind should not exceed that of the frontage building.

London Borough of Camden

No objection

The London Fire and Emergency Planning Authority

No response

Ancient Monuments Society
London and Middlesex Archaeological Society (LAMAS) - Historic Buildings & Conservation Committee

“The front site - no objections in principle although the front block should retain all its signage and detailing, including the sculptured panels. The reduction in height of the new buildings to the rear was welcomed both in terms of opening up views of the Drill Tower and reducing the impact on the main building. The addition of a glazed top floor appeared to be carefully considered and detailed, and the impact on the external appearance and setting of the two Listed structures was considered acceptable.

The middle site - It is felt that the set back of the line of the new behind the Dalton corner block was appropriate although there was some concern about the difference in scale between the two, the rear of the Dalton works was of less significance and, provided that issues of daylight and overlooking can be overcome, the Committee would raise no objections.

The rear site - The proposed 5 storey building would be out of scale and detrimental to the street-scene. The relationship with the adjoining former Ragged School would be particularly insensitive. The design needs to be revised either to reduce the actual height or to reduce the visual impact by producing a horizontal line or string course between the 2nd and 3rd floors, or by doubling up the scale above ground floor level so that the 1st and 2nd floor elements read together with the 3rd and 4th floor together above. In this way the building would relate to the 3/4 story buildings around”.

The Georgian Group

No response

The Victorian Society

No response

GoL

No response

Network Rail

No response

Society for the Protection of Ancient Buildings
No response

**Southern Gas Networks**

No response

**Thames Water**

No in principle objections to the development, subject to the undertaking of all necessary works and applicant entering into all necessary agreements to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system. In addition, the development should utilise appropriate building techniques to prevent and minimise the potential for damage to subsurface water or sewerage infrastructure.

**Twentieth Century Society**

“The Society has no objection, in principle, to the conversion of the majority of the HQ building into residential flats. However, we do not feel that the applicant has fully understood the importance of the architecture nor provided convincing justification for parts of the proposal.

The Roof Extension - English Heritage in its reasons for designation, describes the HQ building as being “of special architectural interest as a well-composed and externally unaltered 1930’s building which, while in the streamlined Moderne idiom, upholds the Arts and Crafts ideal of collaboration between architecture and sculpture.” It also states that the HQ building is “a landmark building on the south bank of the River Thames”.

Despite English Heritage’s assessment - which corresponds with the Society’s views – the applicant asserts the setback of the original roof-form is “not well handled architecturally” (ES(III) 10.2.27) and tries to downplay the significance of the roofline. Such an assertion shows a lack of understanding of the character of the building.

The setback attic storeys are a key architectural feature of the HQ building. The setback was a response to the planning law of the era, and as such it is a particular feature of the architectural language of the time. It is not – as the applicant suggests – following “other buildings ... which have since been redeveloped” (ES (III) 10.2.25).

The setback provides a sculptural roofline that is intended to be viewed across the river. Seen against the sky, the central pavilion grows from the core of the building whilst also being visually embraced by the lower floors. It is an architectural feature that is both progressive and regressive at the same time. In the Society’s view, the loss of such a feature would destroy the character and form of the building, resulting in substantial harm to the building’s significance as a whole and its landmark river front elevation in particular.

According to HE 9.2 of PPS 5 “where the application will lead to substantial harm” it must be demonstrated that the harm caused “is necessary in order to deliver
substantial public benefits that outweigh that harm or loss.” In the Society’s view, this requirement has not been fulfilled.

The Society would also like to underline that:

☐ The flagpole on the front elevation is also significant and must remain.
☐ Any new or replacement glazing must replicate exiting style and materials.
☐ Existing staircases and other original decorative features including fire station doors must remain.

Rear Elevation Infill - The applicant has again misread the intended character of the HQ building by asserting that the upper parts of the rear elevation are not “detailed in any considered way”. However, on balance the Society does not object to filling in the rear re-entrant on the plan with additional flats.

Internal Alterations - The internal alterations to the Club room and the Boardroom are acceptable to the Society in principle, subject to detail approval, recording and reuse of all exiting panelling and architectural detail.

The Obelisk - The obelisk is a highly unusual building and is noted as “interesting” in the Albert Embankment Conservation Area Designation Report, however, the proposal in no way addresses its significance, despite plans for its demolition. HE6.3 states:

Local planning authorities should not validate applications where the extent of the impact of the proposal on the significance of any heritage assets affected cannot adequately be understood from the application and supporting documents.

Guidance Note 68 expands on HE6.3 by stating that “for a substantial demolition it is reasonable to expect the applicant to provide detailed information on the asset as a whole and a thorough explanation of the impact.”

In the Society’s view, this policy has not been fulfilled and the obelisk must be retained.

Depot - The Society is reluctant to see the loss of the 1930’s depot on the Middle Site and feels that under HE 6.3 insufficient information has been provided about the history of the building. However, we concede that this building is of moderate significance.

20th Century Society Conclusion - In principle the Society has no objection to the conversion of the Fire Brigade HQ. However, we believe that the historical research conducted into the site is insufficient and that the applicant misunderstands the nature of the HQ building and the interest of the Obelisk.

The Society is strongly opposed to the glass roof extension, which will substantially harm the significance of the building. We also feel that the Obelisk must be retained.”
5.7 The following Consultees within the Council were consulted and their responses are summarised as follows:

Conservation and Design

We are obliged by the 1990 Act to pay ‘special regard’ to the desirability of preserving the special interest of listed buildings and preserving or enhancing the character or appearance of conservation areas. The internal alterations, extensions and new buildings would significantly harm the special interest of the listed building and harm the character and appearance of the Albert Embankment Conservation Area and the Vauxhall Gardens Conservation Area. The proposals would therefore be contrary to the policies in PPS5 and policies 45 and 47 of the Lambeth UDP.

Whilst I accept that there are public benefits in retaining the fire station use on site and on delivering new housing and employment; there has been no clear and convincing case why the harmful aspects of the scheme are considered essential to delivering these public benefits.

I do not think a case is made in terms of Optimum Viable Use argument put forward by the applicant. On this matter the PPS5 Practice Guide states:

‘89. …If there are a range of alternative ways in which an asset could viably be used, the optimum use is the one that causes the least harm to the significance of the asset….’

‘90. Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset., not withstanding the loss of significance caused, provided that the harm is minimised.’

The residential use brings with it the requirement to deck over the fire station yard – this in itself harms the setting of the listed building. Yet, as far as I can see, the applicant has not provided evidence that other uses (especially those which would not require such a deck) have been considered and how it has been determined that residential use is the optimum viable use.

Furthermore, even if residential use is the optimum viable use for the building the building could be converted without the need for the harmful rear alterations or the roof-top extension. The applicant has not provided clear and convincing justification to suggest that the extensions are essential to secure a viable future for the building.

It is understandable that in finely balanced cases, where there are clear public benefits, we may find it expedient to accept some limited harmful change to a heritage asset Unfortunately, this scheme offers multiple harm to the heritage assets and therefore, as it stands, is unacceptable in heritage and design terms.

[In response to the alterations]: The omission of the winter gardens on the corners of the roof addition are a very modest improvement but they do not go far
enough to address our concerns about the cumulative harm the various alterations and extensions will have on the special interest of this listed building”.

The retention of the Boardroom is however welcomed; as is the commitment to retaining the obelisk within the landscaping scheme of the development.

**Crime Prevention Design Advisor**
No in principle objections, subject to the achievement of the ‘Secured by Design’ accreditation, to conditions and to s106 mitigation.

**Lambeth Arts**
“Lambeth Arts would be happy to support this development application. We would recommend the use of public artists within the design as part of the S106 agreement and would like to be involved in the discussions around this. We would also be supportive of creative uses of retail, commercial and amenity spaces. The planned site has the potential to incorporate public art interventions as part of an integrated public realm. We would recommend that due to their reputation and standing, Beaconsfield, whose building sits adjacent to the proposed development, should also be involved in the consultation around any artist engagement that is commissioned as part of this development”.

**Environmental Projects**

No response at time of writing.

**Planning Policy**

The proposed mixed use on the front site, including residential and continued use of the fire station, is considered to be acceptable in line with current planning policy – as is the provision of active frontage uses along Lambeth High Street.

However, the application is a departure from the development plan as it proposes the introduction of residential accommodation within the Southbank House and Newport Street Key Industrial and Business Area (KIBA). In particular the development would fail against Policy S3 of the Core Strategy, which safeguards KIBAs for business, industrial, storage and waste management uses, including green industries, and other compatible uses, excluding large scale retail. KIBAs represent the boroughs strategic reservoirs of land for business use and are Lambeth’s Locally Significant Industrial Sites as defined in the London Plan. The protection of KIBAs has been strengthened in the Core Strategy through the removal of the ‘mixed use employment area’ designations that were identified in the 2007 UDP.

[In summary] The development would cause demonstrable harm to the vision and objectives of the Core Strategy with respect to the introduction of residential use within a designated Key Industrial Business Area. The applicant has failed to set out significant material considerations in their justification to allow the setting aside of the very strong policies on safeguarding KIBAs for employment uses only.
[In response to the revised submissions Policy Officers comment that:] “There is an ‘in principle’ land use objection to the scheme on the basis that a residential use is being introduced into the area which is designated as a KIBA and which would compromise the objective of maintaining selected parts of the borough for purely business, industrial and other associated uses. While the uplift in commercial floorspace from the originally submitted scheme is welcomed, the highest level of protection is provided to KIBAs and therefore the Policy Team’s fundamental objections remain”.

Transport Planning

No in principle objections; subject to the reduction of the residential car parking to a level in line with London Plan and VNEB OAPF standards and to the recommended conditions and s106 package.

Parks and Green Spaces

In February 2011 and August 2011, the council’s parks and green spaces officers set out their support for the scheme, subject to recommended conditions. They stated that in terms of biodiversity and public greenspaces, the proposals for redevelopment of the application site would appear to be an appropriate use and there are no obvious adverse impacts upon local biodiversity or existing public greenspace.

Proposals to incorporate a number of environmental features into the new development, such as areas of brown and green roof, as well as a commitment to appropriate horticultural landscaping, are welcomed and should enhance the ecological value of the site and surrounding open spaces. These features appear appropriate in terms of scale, location, specification and function, although further information and more detailed specifications, including installation and maintenance, will need to be provided through condition.

The applicant should ensure that any soft landscaping for the new development incorporates not only features that have high ecological value, but will enhance the horticultural and landscape quality of any provided public and private space, and are suitably managed and maintained over the intended lifetime of the new development.

In September 2011 however [in response to revisions], the parks and green spaces officers set out that: “the Lambeth High Street recreation ground is already heavily overshadowed and we consider that the proposed development will increase this to a degree which will have a detrimental effect on the quality of the park especially in winter months. The increased overshadowing will inhibit the development of trees and vegetation, encourage dampness and moss growth and reduce the amenity value of the park as whole”.

Environmental Health – Noise and Pollution
No in principle objections to the development, subject to the imposition of certain planning conditions to ensure the provision of appropriate sound environments for future residents.

Streetcare

No response

North Lambeth Town Centre Manager

No response

5.8 Kate Hoey MP has made the following submission:

“I am extremely worried at the effect upon LIGHT to Whitgift House. Even the analysis by GL Hearn commissioned by the Council clearly states that all but one of the windows tested will fail the BRE Report guideline values for VSC. All rooms will fail the BRE report guideline on the first floor, and 10 rooms will fail the BRE guidelines on the second floor. There are further failings on the higher floors. It further states that 28 of 63 windows would not meet the BRE guidelines on Sunlight amenity. These reductions to the daylight and sunlight amenity are very serious and as the occupants of most of the first and second floors are tenants, some elderly and long term tenants. I genuinely do not see how they are going to be able to afford the extra bills for lighting. Their quality of life will be hugely effected and I do not see why we should allow the building to be so high. Are they going to be automatically offered a flat in the new’ affordable’ housing’ which is being built?

PARKING - The site has excellent access to public transport. There are excellent bus, tube, river and bike hire services within walking distance and most of central London is walkable from the location. Therefore it should be a car free development. Only parking for the fire brigade, disabled drivers and car club spaces should be provided. The parking in the plan will significantly increase traffic in the area.

Affordable Housing - I am concerned too that the proportion of AFFORDABLE HOUSING has now been drastically reduced.

I do not think it sensible in planning or inclusion terms to accentuate the division between the river and the housing estates behind. Because building G is entirely affordable housing this is exactly what happens. There should be a greater mix of housing tenure to comply with the London Plan and aimed at creating balanced communities.

Whilst the Fire Brigade has a right to bring forward plans I would submit that this development is too high and has not been planned to fit in with the special heritage of the area including listed buildings. Most of all I feel that the lighting issue must be addressed and radical changes made.

I do hope the committee will reject the current application.
5.9 The Prince’s ward councillors object to the development on the following grounds:

Proportion of affordable housing. 7% is completely insufficient and far short of Lambeth’s 40% target. We are suspicious of the developer’s claim that any more would make the scheme unaffordable – they have radically revised their scheme on several occasions, having previously said this would be impossible.

Level of parking spaces. The site has a PTAL level of 6 with excellent access to public transport. There are excellent bus, tube and bike hire services within walking distance and most of central London is walkable from the location. Therefore it should be a car free development. Only parking for the fire brigade, disabled drivers and car club spaces should be provided. The unnecessary 69 parking spaces will significantly increase traffic in the area. Residents of the new buildings should not be entitled to on-street parking permits.

Location of affordable housing. Building G is entirely affordable housing. This accentuates the division the railway viaduct makes between a wealthy riverside strip of land and the deprived estates to the east of the viaduct. Affordable housing should be located to the west of the viaduct and Building G should contain private housing to create a better mix of housing tenures in both locations. Currently the proposal contravenes the London Plan policy to create mixed and balanced communities.

Loss of commercial space in Building G. Building G is opposite the shops and pubs of Black Prince Road, and is an obvious place for a ground floor retail/restaurant unit to contribute to the successful local cluster of businesses operating there. Lambeth’s planning policies do not allow bedrooms on the ground floor in this area because of the risk of flooding.

We believe the design of Building G is a missed opportunity to create a well-designed and well-proportioned building which will complement the similar-sized heritage buildings around it (the Ragged School, the Queen’s Head, and the Jolly Gardeners).

Light to Whitgift House. We also have serious concerns about the effect on light to Whitgift House. Analysis by GL Hearn commissioned by Lambeth Council clearly states that all but one of the windows tested will fail the BRE Report guideline values for VSC. All rooms will fail the BRE report guideline on the first floor, and 10 rooms will fail the BRE guidelines on the second floor. There are further failings on the higher floors. It further states that 28 of 63 windows would not meet the BRE guidelines on Sunlight amenity. These reductions to the daylight and sunlight amenity are considerable and will have a serious impact on the amenity of the residents of Whitgift House.

6.0 RELEVANT POLICIES
6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise.

6.2 The development plan in Lambeth is:

- The London Plan (adopted July 2011);
- Lambeth’s Local Development Framework (LDF) Core Strategy (adopted 19 January 2011); and
- The remaining saved policies in the ‘Lambeth Unitary Development Plan (UDP) 2007: Policies saved beyond 5 August 2010 and not supersede by the LDF Core Strategy January 2011’.

6.3 It should be noted that given the recent adoption of the council’s Core Strategy, the policies contained therein and those remaining in the UDP are in general conformity with the recently adopted London Plan. For the purposes of this recommendation report therefore the assessment will concentrate upon the development’s compliance, or not, with Core Strategy and UDP Policies. Reference will only be made to London Plan Policies where there is conflict or where it is necessary and/or appropriate to do so.

6.4 Material considerations include national, regional and local planning policy statements, planning policy guidance and Supplementary Planning Documents.

6.5 London Plan

6.5.1 The London Plan is the overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031. It forms part of the development plan for Greater London. London boroughs’ local plans need to be in general conformity with the London Plan, and its policies guide decisions on planning applications by councils and the Mayor.

6.5.2 From 22 July 2011 this replaced the London Plan (consolidated with alterations since 2004) which was published in February 2008. The earlier document now has no formal effect.

6.5.3 The following policies of the London Plan are relevant:

Policy 1.1 Delivering the strategic vision and objectives for London
Policy 2.9 Inner London
Policy 2.10 Central Activities Zone – strategic priorities
Policy 2.11 Central Activities Zone – strategic functions
Policy 2.12 Central Activities Zone – predominantly local activities
Policy 2.13 Opportunity areas and intensification areas
Policy 3.1 Ensuring equal life chances for all
Policy 3.2 Improving health and addressing health inequalities
Policy 3.3 Increasing housing supply
Policy 3.4 Optimising housing potential
Policy 3.5 Quality and design of housing developments
Policy 3.6 Children and young people’s play and informal recreation facilities
Policy 3.7 Large residential developments
Policy 3.8 Housing choice
Policy 3.9 Mixed and balanced communities
Policy 3.10 Definition of affordable housing
Policy 3.11 Affordable housing targets
Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
Policy 3.16 Protection and enhancement of social infrastructure
Policy 3.17 Health and social care facilities
Policy 3.18 Education facilities
Policy 3.19 Sports facilities
Policy 4.1 Developing London’s economy
Policy 4.2 Offices
Policy 4.3 Mixed use development and offices
Policy 4.5 London’s visitor infrastructure
Policy 4.6 Support for and enhancement of arts, culture, sport and entertainment provision
Policy 4.7 Retail and town centre development
Policy 4.8 Supporting a successful and diverse retail sector
Policy 4.10 New and emerging economic sectors
Policy 4.11 Encouraging a connected economy
Policy 4.12 Improving opportunities for all
Policy 5.1 Climate change mitigation
Policy 5.2 Minimising carbon dioxide emissions
Policy 5.3 Sustainable design and construction
Policy 5.5 Decentralised energy networks
Policy 5.6 Decentralised energy in development proposals
Policy 5.7 Renewable energy
Policy 5.8 Innovative energy technologies
Policy 5.9 Overheating and cooling
Policy 5.10 Urban greening
Policy 5.11 Green roofs and development site environs
Policy 5.12 Flood risk management
Policy 5.13 Sustainable drainage
Policy 5.14 Water quality and wastewater infrastructure
Policy 5.15 Water use and supplies
Policy 5.16 Waste self-sufficiency
Policy 5.21 Contaminated land
Policy 6.1 Strategic approach
Policy 6.2 Providing public transport capacity and safeguarding land for transport
Policy 6.3 Assessing effects of development on transport capacity
Policy 6.4 Enhancing London’s transport connectivity
Policy 6.5 Funding Crossrail and other strategically important transport infrastructure
Policy 6.7 Better streets and surface transport
Policy 6.9 Cycling
Policy 6.10 Walking
Policy 6.11 Smoothing traffic flow and tackling congestion
Policy 6.12 Road network capacity
Policy 6.13 Parking
Policy 7.1 Building London’s neighbourhoods and communities
Policy 7.2 An inclusive environment
Policy 7.3 Designing out crime
Policy 7.4 Local character
Policy 7.5 Public realm
Policy 7.6 Architecture
Policy 7.7 Location and design of tall and large buildings
Policy 7.8 Heritage assets and archaeology
Policy 7.10 World Heritage Sites
Policy 7.11 London View Management Framework
Policy 7.12 Implementing the London View Management Framework
Policy 7.13 Safety, security and resilience to emergency
Policy 7.14 Improving air quality
Policy 7.15 Reducing noise and enhancing soundscapes
Policy 7.18 Protecting local open space and addressing local deficiency
Policy 7.19 Biodiversity and access to nature
Policy 7.29 The River Thames
Policy 7.12 Implementing the London View Management Framework
Policy 7.13 Safety, security and resilience to emergency
Policy 7.14 Improving air quality
Policy 7.15 Reducing noise and enhancing soundscapes
Policy 7.18 Protecting local open space and addressing local deficiency
Policy 7.19 Biodiversity and access to nature
Policy 7.29 The River Thames
Policy 8.2 Planning obligations

6.5 Lameth’s Local Development Framework Core Strategy

6.5.1 The Core Strategy was adopted by the council on 19 January 2011.

6.5.2 The following Policies of the Council’s Core Strategy are relevant to the current planning application:

Policy S1 – Delivering the Vision and Objectives
Policy S2 – Housing
Policy S3 – Economic Development
Policy S4 – Transport
Policy S5 – Open Space
Policy S6 – Flood Risk
Policy S7 – Sustainable Design and Construction
Policy S9 – Quality of the Built Environment
Policy S10 – Planning Obligations
Policy PN2 – Vauxhall

6.6 UDP Policies, saved beyond 5th August 2010

6.6.1 The following policies (whole or part thereof) of the adopted Unitary Development Plan (2007), saved beyond 05 August 2010 and not superseded by the adoption of the Core Strategy, are relevant to this application:

Policy 7 Protection of Residential Amenity;
Policy 9 Transport Impact;
Policy 12 Strategic Transport Hubs and Transport Development Areas
Policy 14 Parking and Traffic Restraint;
Policy 16 Affordable Housing;
Policy 19 Active Frontage Uses;
Policy 23 Protection and Location of Other Employment Uses;
Policy 26 Community Facilities;
Policy 29 The Evening and Late Night Economy, Food and Drink and Amusement Centre Uses;
Policy 30 Arts and Culture;
Policy 31 Streets, Character and Layout;
Policy 32 Community Safety/Designing Out Crime;
Policy 33 Building Scale and Design;
Policy 35 Sustainable Design and Construction;
Policy 36 Extensions and Alterations;
Policy 37 Shopfronts and Advertisements;
Policy 38 Design in Existing Residential/Mixed Use Areas;
Policy 39 Streetscape, Landscape and Public Realm Design;
Policy 40 Tall Buildings;
Policy 41 Views;
Policy 43 The River Thames Policy Area – Urban Design;
Policy 45 Listed Buildings;
Policy 47 Conservation Areas;
Policy 50 Open Space and Sports Facilities; and
MDO 4 London Fire Brigade Headquarters, 8 Albert Embankment

6.7 National Planning Policy

6.7.1 The following Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPS) are relevant:

Planning Policy Statement 1: Delivering Sustainable Development:
Planning Policy Statement 3: Housing
Planning Policy Statement 4: Planning for Sustainable Economic Growth
Planning Policy Statement 5: Planning for the Historic Environment
Planning Policy Statement 9: Biodiversity and Geological Conservation
Planning Policy Guidance 13: Transport:
Planning Policy Guidance 24: Planning and Noise
Planning Policy Statement 25: Development and Flood Risk

6.8 Regional Guidance

6.8.1 The following regional guidance is relevant to the application proposal:

- GLA - Green Light to Clean Power – The Mayor’s Energy Strategy;
- GLA - Accessible London – Achieving an Inclusive Environment;
- GLA - Sustainable Design and Construction Supplementary Planning Guidance;
- GLA – London View Management Framework;
- GLA - Providing for children and young people’s play and informal recreation Supplementary Planning Guidance;
- GLA - Planning for a Better London;
- GLA - Draft London Housing Strategy;
• GLA – Draft Vauxhall, Nine Elms and Battersea Opportunity Area Planning Framework; and
• GLA – Draft Housing Design Guide

6.8.1 The draft Vauxhall Nine Elms Battersea Opportunity Area Planning Framework (hereafter referred to as “the OAPF”) was published in November 2009 for consultation. Whilst still in draft form, the OAPF has been produced by the GLA in collaboration with Wandsworth and Lambeth councils, landowners and other key stakeholders. It sets out a comprehensive framework for the VNEB area, including a landuse strategy, estimates of development capacity, a package of transport interventions, public realm and tall building strategies and an energy master plan.

6.9 Local Guidance

6.9.1 The council has adopted the following Supplementary Planning Documents, which are relevant:
• SPD: Safer Built Environments
• SPD: Sustainable Design and Construction
• SPD: S106 Planning Obligations
• SPD: Guidance and Standards for Housing Development and House Conversions Supplementary Planning Document

6.9.2 The Council has also published a draft Supplementary Planning Document pertaining to the Vauxhall area (June 2008). This document however has not been adopted at this stage and can be attributed limited weight.

6.9.3 The Council’s ‘Waste & Recycling Storage and Collection Requirements: Guidance for Architects and Developers’ (2006) is also relevant.

7.0 PLANNING CONSIDERATIONS

7.1 Land Use

7.1.1 In terms of Development Plan designation: the front and middle sites lie within the Central Activities Zone; the front, middle and rear sites fall within the Vauxhall Nine Elms Battersea Opportunity Area; the front and middle site are identified as a major development opportunity (MDO4); the front and middle sites fall within the Thames Policy Area; and the middle and rear sites fall within a Key Industrial and Business Area (KIBA).

7.1.2 Vauxhall, Nine Elms and Battersea are identified as an Opportunity Area by Annex 1 of the London Plan, on the basis that the area is capable of accommodating substantial new jobs and homes. Policy 2.13 sets out the expectation that developments in the opportunity area “optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses”.

7.1.3 The OAPF sets out a landuse strategy for the area and anticipates residential mixed use intensification on Albert Embankment, along the river frontage. It is
envisaged that this area will come forward as a new housing area with a mix of commercial and community uses to support emerging communities. More limited intensification is anticipated around Spring Gardens. This area is more sensitive in terms of its existing land use and proximity to existing housing. Key sites are likely to be suitable for high density development which would need to take account of sensitive adjacent land uses.

7.1.4 Policy PN2 of the Core Strategy is area specific to Vauxhall and sets out the council’s development aspirations and objectives for that area. In particular Policy PN2 identifies that the council is supportive of mixed use development at Vauxhall for employment uses, housing, retail, hotel, student accommodation, leisure, entertainment and other commercial and community uses in line with its Central Activity Zone designation and as part of the wider London Plan Vauxhall/Nine Elms/Battersea Opportunity Area. Of identified importance for Vauxhall is the need to develop a distinct heart, recognisable sense of place and definite identity with distinct quarters to achieve a sustainable and vibrant urban area and to fulfil its role as a coherent centre, as well as linking with and benefiting adjoining areas and their communities. Policy PN2 sets out council support for at least 3,500 new homes and 8,000 jobs in the Vauxhall area and for the provision of appropriate community and public transport infrastructure improvements.

7.1.5 With specific regards to the Albert Embankment and the Riverside, Policy PN2 (h) is supportive of enhancing the appearance and character of Albert Embankment, with active ground floor frontages and an expanded range of employment and residential uses with a greater footfall, ensuring that it is highly accessible and well connected to the surrounding area, maintaining and improving safe access to the River Thames with development avoiding the creation of a wall effect through ensuring variation in the roofline and sufficient gaps between buildings, safeguarding strategic and local views and historic environment.

7.1.6 For the Spring Gardens and Vauxhall Walk area, within which the rear site is located, policy PN2 (i) sets out support for lower density development than elsewhere in the Vauxhall area, developing a creative residential quarter centred on Vauxhall Walk.

7.1.7 Notwithstanding the area specific policies, the middle and rear sites are subject to a KIBA designation. In this regard policy S3 affords KIBAs the highest protection within the borough for business, industrial, storage and waste management uses, including green industries, and other compatible commercial uses, excluding large scale retail. KIBAs are Lambeth’s “Locally Significant Industrial Sites”. They are needed partly to safeguard employment, but also: to maintain a balanced distribution of land uses in the borough available to differing skill levels; to maintain a full range of unit and site sizes to aid inward investment and firm retention; to reduce commuting for the borough’s residents who can often more easily access employment in such uses (especially men); and to reduce social exclusion and the need to travel by providing/maintaining incubator units.
7.1.8 In respect to the front site, UDP Policy 23 and Core Strategy Policy S3 are relevant. UDP Policy 23 sets out the general presumption for the protection of employment land outside of KIBAs, unless certain criteria are met. Core Strategy Policy S3 sets out that the council will seek to maintain a stock of other sites and premises (not in KIBAs) in commercial use across the borough subject to the suitability of the site and location.

7.1.9 In respect to the front and middle sites, MDO4 explicitly states:

“MDO 4 - London Fire Brigade Headquarters, 8 Albert Embankment - Area: 1 Ha Site likely to become vacant. Retention of Grade II listed original frontage building and hose-drying tower in Albert Embankment Conservation Area. The brigade workshops building to the east of Lambeth High Street makes a neutral contribution to the character of the conservation area. Redevelopment of 1970s control room to rear is encouraged. Wider use of pier. Re-creation of Lambeth High Street as a street with active frontage uses."

7.1.10 The established use across the front, middle and rear sites is sui generis; having historically and lawfully provided the Fire Authority headquarters, working fire station and fire fighter accommodation (the front site), workshops and offices used by the Fire Brigade (the middle site) and ancillary parking for the front and middle sites (the rear site).

7.1.11 The net existing floor space of the front and middle sites, as listed in the application submissions, is 21,097sqm.

7.1.12 The front site contains the listed Fire Brigade Headquarters building which now contains a fire station at ground floor level. The offices on the upper floors of the building were vacated in 2008 and the control room has also been vacated. The upper floors originally provided on-site accommodation for fire fighting staff but have been vacant since the Fire Brigade’s policy to provide such accommodation was ceased. The site is considered to be in employment use as both the fire station itself and the vacant offices constitute employment floorspace. The fire service currently operates four watches in the building; generating circa 90 jobs.

7.1.13 The Sui Generis accommodation of the middle site is currently vacant (again since 2008), having been previously occupied by the London Fire Brigade. When occupied the fire service used it for administrative functions, parking of vehicles and storage. The gross internal area of the middle site is approximately 6,860sqm. The Employment Assessment submitted with the application indicates that approximately 95 jobs were associated with the operations of the middle site when functioning.

7.1.14 In terms of the proposed uses, the continued operation of the fire station would occupy 2,634sqm (GIA) on the front site and, according to the application submissions, would employ approximately 120 people. Further to this, 8,126sqm (GIA) of B1 floorspace is proposed for the middle site and 661sqm (GIA) of A class floor space is proposed between the front and middle sites. The B1 floorspace would comprise of modern adaptable units for small and medium enterprises for which there is an identified need within the borough. Having
regard to employment density figures contained within HCA guidance, it is anticipated that the quantum of development proposed would generate in the region of 832 jobs (an uplift of 742 compared to the existing situation), as follows:

<table>
<thead>
<tr>
<th>Use</th>
<th>GIA (sqm)</th>
<th>Indicative Employment Density (HCA)</th>
<th>Number of Jobs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fire Station</td>
<td>2,634</td>
<td>N/A</td>
<td>120</td>
</tr>
<tr>
<td>B1/Office</td>
<td>8,126</td>
<td>12</td>
<td>677</td>
</tr>
<tr>
<td>A1 – A4</td>
<td>661</td>
<td>19</td>
<td>35</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td><strong>832</strong></td>
</tr>
</tbody>
</table>

7.1.15 In the first instance it should be noted that the uses proposed are entirely consistent with the Central Activities Zone designation; either as activities contributing towards London's role as a world city or appropriate supporting activities. In addition, the OAPF and Core Strategy Policy PN2 are both facilitating of mixed use developments inclusive of residential uses within the Albert Embankment area and to the east of the railway embankment.

7.1.16 Saved Policy 19 of the UDP sets out that development in locations where it would promote urban vitality and/or regeneration, should have uses with active frontages open to the public. The introduction of A uses either side of Lambeth High Street as is proposed, together with the formation of the new public entrance to the community fire station in the flank of 8 Albert Embankment (building A), would provide active frontages to these areas and contribute to and promote urban vitality and/or regeneration. Whilst further active frontage uses would perhaps be beneficial in terms of their role of rejuvenating this part of the high street, the provision of such would inhibit the operations of the fire station.

7.1.17 It is also the case that the development would retain the Grade II listed original frontage building and hose-drying tower, remove the 1970s control room and contribute towards the re-creation of Lambeth High Street as a street with active frontage uses; all matters in accordance with the MDO designation of the front and middle sites.

7.1.18 Officers consider that the uses proposed on the front site are consistent with current development plan policy for such. Whilst currently considered an 'employment site', officers are mindful that only the ground to 2nd floor are currently in use and that a large part of the original building was provided specifically for fire-fighter accommodation. Under UDP Policy 23 to meet the test of being surplus there is a requirement for marketing evidence, although at times when there is significant over supply of office space evidence of similar buildings lying vacant in the area will suffice. The accompanying employment report lists a substantial supply of existing office space in the area and also advises that supply significantly exceeds demand. The evidence presented is considered sufficient justification to enable the provision of a mixed use residential lead development of the front site.

7.1.19 Notwithstanding, the middle and rear sites fall within a Key Industrial and Business Area (KIBA). The introduction of residential uses into these sites is
therefore a departure to Core strategy Policy S3, which safeguards KIBAs for B Class Uses (business, industrial, warehousing) and other uses falling outside a use class and commonly found in industrial areas (e.g. artists studios/rehearsal areas and galleries; haulage; employment training; bus garages & telecommunications). The question therefore is whether there are any other material planning considerations that exist such that would justify the determination of the application other than in accordance with the development plan.

7.1.20 First of all it is important to note that the MDO policy and Core Strategy Policy PN2 do not give the application site a specific exception to the presumptions set out with regard to KIBAs in Core Strategy policy S3; other than in regards to the provision of active frontage uses either side of Lambeth High Street.

7.1.21 Members are also advised that in advising on the retention of the Southbank House and Newport Street KIBA, the Core Strategy Inspector advised that

“This KIBA is situated in a highly accessible location and the surrounding area is characterised by residential buildings and recent mixed use developments. It is argued that confining KIBAs to employment use will mean that future development in this area cannot reflect the mixed use character of the wider locality. It will also restrict redevelopment of sites within the KIBA in conjunction with the listed Fire Station building on Albert Embankment.

Removal of the KIBA designation would clearly overcome this obstacle and allow future development to reflect that in the surrounding area. However there is no compelling evidence to demonstrate that retaining this KIBA makes the CS unsound.”

7.1.22 Notwithstanding, as part of this application the council commissioned BNP Paribas to verify whether any KIBA compliant uses can be regarded as economically viable at the KIBA designated parts of the Site; whether the use of KIBA designated areas for wholly KIBA compliant uses can be accommodated without compromising the economic viability of the proposed development; whether an increase in KIBA compliant uses within the development can be accommodated without compromising the economic viability of the development; and whether Building D can be reduced in height without compromising the economic viability of the Development [NB: this latter test relates more to the design implications of the development – see later section of this report].

7.1.23 In the first instance it should be noted that the scheme as is currently presented would secure a negative RLV, so the developer would be taking a risk on the viability of the scheme improving if they are to implement at this time. In this context BNP Paribas concluded that a warehouse or open storage scheme at the middle and rear sites, with residential uses at the front site, generates a better RLV than the proposed scheme (albeit that all options generate a negative RLV so would be regarded as unviable). What this suggests is that a KIBA compliant use could be provided at the rear and middle sites in place of the residential proposals. However, the uses set out in the application submissions would provide more jobs; the KIBA compliant options still generate a negative land value so that while
the applicant might take a view on sales values increasing they would be far less likely to take a risk on the viability of a KIBA compliant use improving, so no KIBA use would likely come forward; the appraisals have not fully accounted for the impact of KIBA uses at the middle site on sales values at the front site; and a warehouse or open storage scheme would not sit comfortably with the strategic aspirations of optimising job creation in the OAPF. BNP Paribas advise that a KIBA compliant office scheme on the middle and rear sites would generate a substantial deficit which is of much greater magnitude than that generated by the Development.

7.1.24 BNP Paribas also advise that increasing the quantum of office accommodation provided within the development would have a detrimental impact upon viability, with potential knock on effects for the level of s106 contributions or affordable housing. In addition, reducing the height of Block D and thus removing private residential accommodation would have a further detrimental impact upon viability.

7.1.25 It is also the case that the development would ensure the continued use of the frontage building as a fire station, fitted out to modern standards. This provides for the continued historic use of the building by the brigade, which is a substantial heritage benefit of the development.

7.1.26 The development would also provide a refurbished fire station (self funded through the private residential component of the development) more adept to serve the area within which the site is located (inclusive of the nationally important Westminster World Heritage Site) and the quantum of development expected to come forward through the OAPF. It should be noted that the application submissions set out the need to modernise the existing facilities of the site so as to offer its fire-fighters safer, more flexible and efficient accommodation to support the progressive improvements for their diverse fire prevention and fire and rescue service. This constitutes a local community and a national benefit of significant weight.

7.1.27 In addition, the jobs generated by the development are a material planning consideration that weigh substantially in favour of approving the scheme. The scheme would bring lasting wider social benefits, such as employment, and contribute to economic growth in this part of Lambeth. The scheme would contribute to a mix of uses and activity of benefit to the immediate locality and the wider area, whilst the proposed housing would contribute significantly towards the council’s Vauxhall and borough wide housing targets. The development would also provide regeneration benefits to the area, inclusive of the removal of the 1970s control centre and the re-animation of Lambeth High Street together with a modern development of the rear site which currently consists of a tarmac hard standing and contributes little to the vicinity.

7.1.28 Given the policy context specific to the OAPF and the strong presumption set out for mixed use development inclusive of residential uses, and having regard to the substantial community and planning benefits that the development would deliver, it is considered that sufficient justification exists to enable the positive determination of the application other than in accordance with core strategy policy S3 of the development plan. The scheme is predicated on maximizing the
employment space offer, in accordance with the KIBA designation, and housing has been introduced to improve the financial viability of the scheme and to make such a significant employment offer (8,126sqm GIA) viable and sustainable. The land uses proposed would accord with development plan policy in all other regards.

7.2 Residential Accommodation

7.2.1 London Plan Policy 3.3 seeks to increase London’s supply of housing and sets for Lambeth a minimum ten year target 11,950.

7.2.2 Policy S2 of the Core Strategy commits the council to the provision of at least 7,700 net additional dwellings across the borough between 2010/11 and 2016/17 in line with London Plan targets and a further 8,800 more homes by 2024/25, subject to London Plan targets for this period.

7.2.3 Policy PN2 of the Core Strategy sets out council support for at least 3,500 new homes in the Vauxhall area.

7.2.4 Core Strategy Policy S2 sets out that developments should provide a mix of housing sizes and types to meet the needs of different sections of the community. With a scheme of this nature, at least 50 per cent of housing should be affordable where public subsidy is available, or 40 per cent without public subsidy, subject to housing priorities and, where relevant, to independently validated evidence of viability, or where there is a clearly demonstrable benefit in a different mix in the case of housing estate regeneration. Furthermore, there is an expectation that the mix of affordable housing should be 70 per cent social rented and 30 per cent intermediate.

7.2.5 London Plan Policy 3.11 sets out that the Mayor will, and boroughs and other relevant agencies and partners should, seek to maximise affordable housing provision and ensure an average of at least 13,200 more affordable homes per year in London over the term of this Plan. In order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social rent and 40% for intermediate rent or sale. Priority should be accorded to provision of affordable family housing.

7.2.6 Policy 16 of the UDP sets out that a range of unit sizes of affordable housing should be provided, having regard to local circumstances, site characteristics and the aims of the borough’s annual housing strategy. It goes on to set out the presumption that affordable housing should be provided ‘in-situ’.

7.2.7 London Plan Policy 3.8 encourages a full range of housing choice. This is supported by the London Plan Housing Supplementary Planning Guidance, which seeks to secure family accommodation within residential schemes, particularly within the social rented sector. Recent guidance is also set out in the London Plan Interim Housing Supplementary Planning Guidance (April 2010),
whilst the London Housing Strategy sets a target for 42% of social rented homes to have three or more bedrooms.

**Housing Provision and size/tenure mix**

7.2.8 The development proposed would provide 275 new residential dwellings in a location where high density residential developments are appropriate. This constitutes a significant contribution towards the council’s borough wide and Vauxhall housing targets. This is a planning benefit that would, subject to the residential quality, weigh heavily in favour of the development.

7.2.9 The development would also provide some 19 units of affordable housing. This would contribute to the affordable housing targets set out in London Plan Policy 3.11 and constitutes a planning benefit that weighs in favour of the development.

7.2.10 The development proposes the following mix of residential units:

<table>
<thead>
<tr>
<th></th>
<th>Market</th>
<th>Social Rented</th>
<th>Intermediate</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio &amp; 1 bed units</td>
<td>114</td>
<td>2</td>
<td>3</td>
<td>119</td>
</tr>
<tr>
<td>2 bed units</td>
<td>94</td>
<td>1</td>
<td>3</td>
<td>98</td>
</tr>
<tr>
<td>3 bed units</td>
<td>48</td>
<td>7</td>
<td>3</td>
<td>58</td>
</tr>
<tr>
<td>Total</td>
<td>256</td>
<td>10</td>
<td>9</td>
<td>275</td>
</tr>
</tbody>
</table>

7.2.11 81% of the market housing would be provided as 1 and 2 bed units; reflective of the recommendations of the council’s housing needs survey 2007 which sets out that the profile of market housing provided should be skewed towards smaller (one and two bedroom) units.

7.2.12 Of the 275 units, only 19 (7%) would be affordable. Of that 7%, there is proposed an approximate 50/50 split between the social rented and the intermediate units. This would fall far short of the typically expected levels of provision and the 70/30 tenure split that would generally be expected under Core Strategy Policy S2. It also falls far short of the minimum 15% affordable housing requirement set out in the VNEB OAPF.

7.2.13 Notwithstanding, Policy S2 clearly sets out that the levels of affordable housing will be subject, where relevant, to independently validated evidence of viability. In this instance the applicant has submitted a financial viability assessment which has been referred to the council’s consultant BNP Paribas for independent verification. On the basis of the types and quantum of uses proposed for the site, BNP Paribas advise that “this scheme is not [sufficiently] economically viable, generating a deficit [against the existing use value benchmark of the site]... We therefore conclude that this scheme provides more than the maximum viable quantum of affordable housing and financial planning obligations. As such, the level of provision can be regarded as being optimal”.

7.2.14 Officers are mindful that the BNP Paribas verification was done at a time when the applicant was assuming s106 contributions of only £1.1m (£7m is now proposed) and when the level of residential parking was at a ratio of 0.5 per unit (0.25 is now proposed). The amendments to the scheme that have come about
to address officer concerns in these regards have both contrived to further reduce the overall value of the scheme so as to further convince officers that the levels the affordable housing provision is being optimised.

7.2.15 It should also be noted that the low levels of overall affordable housing provision directly result from maximisation of the overall provision of employment floorspace within the development, which itself has come about in direct response to the local KIBA policy context.

7.2.16 On first appearance the affordable units, in particular the social rented element, appears to be segregated from the rest of the development by reason of its location to the other side of the railway tracks. However, the clustering of the minimal number of units as is proposed makes practical sense in terms of future management. If the proposed quantum of social rented and intermediate housing is accepted by the Council, the distribution of such as is proposed is not considered reason to resist the development. Each of those units would meet minimum SPD standards in terms of size and the LPA could ensure the detailed design quality across the three sites by way of planning conditions.

7.2.17 The provision of 70% family-sized units in the social rented tenure well exceeds the GLA’s strategic target of 42% of social rented homes to have three or more bedrooms. This addresses a priority need within the Borough and is welcomed in conjunction with the recommendations of the council’s housing needs survey 2007; which sets out that the profile of social rented housing provided should be skewed towards larger (three and four bedroom) units.

7.2.18 The intermediate provision provides an appropriate split across the three unit sizes.

7.2.19 On balance therefore, it is considered that the dwelling mix and distribution proposed is acceptable. Given that the scheme is seeking to maximise the employment floor space in response to the local policy requirements, the planning benefits of the scheme and the need to provide affordable housing that can be practically managed, officers are accepting that the circumstances of the development are sufficient such that it need not provide a 70/30 social housing/intermediate split in this circumstance.

7.2.20 Members are advised that the applicant is not willing to entertain an overage clause in the s106 for commercial reasons.

Accessibility/Lifetime Homes

7.2.21 The applicant’s design and access statement confirms that all the residential units would meet the Lifetime Homes criteria. The application submissions also confirm that at least 10% of the residential units would be wheelchair accessible. In these respects the development would be compliant with Policies 3.8 of the London Plan and S2 of the Core Strategy. Such matters could be ensured by way of planning conditions.

7.3 Quality of Residential Accommodation
7.3.1 Policy S2 of the Core Strategy requires the provision of high standards of residential amenity, having regard to Council space standards.

7.3.2 Policy S2 of the Core Strategy is supplemented by the Council’s SPD: Guidance and Standards for Housing Development and House Conversions.

Size

7.3.3 The dwellings proposed are in general compliance with the SPD room/unit size standards. Other than 4 studio flats in building A, each of the residential units either meet or exceed the unit size standards set out in the relevant SPD. The majority of flats vastly exceed the minimum room unit sizes.

7.3.4 The studio flats in question would only have a 1sqm (in three instances) and 2sqm (in one instance) shortfalls against the 37sqm requirement of the SPD. This shortfall is not considered sufficiently serious as to justify a reason for refusal; especially when weighed against the planning benefits that the scheme offers.

7.3.5 On balance it is considered that the development is appropriately and logically arranged so as to provide livable residential accommodation in terms of size, circulation and functionality.

Outlook, Privacy and Aspect

7.3.6 The spatial arrangements of the buildings, having regard also to their relationship with their surroundings, are considered appropriate in so far as they would afford each of the new residential units an acceptable degree of both outlook and privacy. Where the constraints of the site lend themselves to this footplate of development, it would not be possible to provide each residential unit with a second aspect whilst continuing to maximize the efficient use of the site.

Daylight/sunlight

7.3.7 With respect to buildings A, B, D, E(N) and F it is acknowledged that certain elements of this building would be significantly below the BRE and BS target values of daylight and sunlight due to their proximity to the other proposed buildings. Nevertheless, the results are considered consistent with the light levels to be expected in this urban area.

7.3.8 Building G should enjoy adequate levels of light amenity and would only be limited by the balconies, where proposed.

Noise Environment

7.3.9 The application is accompanied by a noise impact assessment, which forms part of the Environmental Statement. The conclusions and recommendations of mitigation set out therein are generally accepted by officers.

7.3.10 Moreover, it is not unusual in London for planning permissions to be granted on sites which fall within Noise Emission Categories (NECs) of either C or D, although in such cases it is generally expected that the highest standards of noise insulation must be provided. It should also be noted that the application site falls within the Central Activities Zone and the Albert Embankment area of the
VNEB Opportunity Area where a mix of uses, including residential, is promoted by development plan policy.

7.3.11 It is considered that the package of conditions recommended would suitably ensure appropriate noise environments for future occupiers of the development. In this regard the development need not fail against London Plan Policy 7.15 or Policy S2 of the Core Strategy.

Vibration
7.3.12 Buildings F and G lie within close proximity to the railway viaduct and, as such, would potentially experience vibrations detrimental to the amenity of future residents of the development. The Environmental Statement recommends that, given the design issues associated with vibration isolation and the difficulty of reliably predicting the need for such mitigation prior to works commencing, a test piling exercise is undertaken. Such matters could reasonably be secured by way of condition.

Wind Environments
7.3.13 The application is accompanied by a Wind Assessment; which forms part of the Environmental Statement. That document demonstrates that the development, and the areas around and within the vicinity of the development, would not experience wind conditions inappropriate for their intended uses. The landscaping scheme for the podiums however should pay special regard to their role in mediating the potentially adverse impacts of the wind on these communal amenity areas. In the circumstances the development need not fail against UDP Policy 40 and Core strategy Policy S9.

Amenity and Play Space Provision
7.3.14 Policy S2 of the Core Strategy requires the provision of high standards of residential amenity, having regard to Council space standards and including the provision of outside space for children’s play in private and communal gardens. For a development inclusive of 275 residential units, the council’s SPD would require an amenity space provision of some 2800sqm in total – at least 50sqm of which should be communal space.

7.3.15 The development would provide internal communal space within the ‘communal clubhouse’ and retained boardroom, external communal spaces over the podiums of the front and middle sites, and private external balconies to the residential units. The amount of amenity space provision proposed would far exceed the 2,800 sqm SPD requirement as follows:

<table>
<thead>
<tr>
<th>Site</th>
<th>Private Balconies</th>
<th>Communal Roof Gardens</th>
<th>Communal Podiums</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Front Site</td>
<td>1194</td>
<td>350 (building B)</td>
<td>733</td>
<td>2601</td>
</tr>
<tr>
<td></td>
<td></td>
<td>304 (building C)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Middle Site</td>
<td>1089</td>
<td>111 (building D)</td>
<td>1628</td>
<td>2939</td>
</tr>
<tr>
<td></td>
<td></td>
<td>111 (building F)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rear Site</td>
<td>60</td>
<td>47</td>
<td></td>
<td>107</td>
</tr>
<tr>
<td>Total</td>
<td>2343</td>
<td>923</td>
<td>2361</td>
<td>5647</td>
</tr>
</tbody>
</table>

*all measurements in sqm
7.3.16 Policy 3.6 of the London Plan sets out that the Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible. Policy S2 of the Core Strategy also sets out the presumption that developments should provide outside space for children’s play in private and communal gardens.

7.3.17 Using the methodology within the Mayor’s supplementary planning guidance ‘Providing for Children and Young People’s Play and Informal Recreation’ it is anticipated that there will be approximately 65 children within the development; expected to comprise of 23 x 0-4 year olds, 24 x 5-10 year olds and 18 x 11-15 year olds. The guidance sets a benchmark of 10sqm of useable child playspace to be provided per child, with under-5 child playspace to be provided on-site. In this context the guidance would expect that the development makes provision for 650 sqm of play space; of which 230 sqm should be for 0-4 year olds provided on site. It should be noted that Lambeth’s SPD is explicit in that the delivery requirements for children’s play space provision should be considered as part and parcel of the overall amenity space provision for the site, and not over and above.

7.3.18 The applicant has agreed to the provision of 232 sqm of 0-5s play space within the communal amenity space of the middle site. In addition, a contribution of £39,833 is proposed towards the improvements and/or provision of play space in the vicinity of the development. Such a strategy to accommodate the playspace requirements generated by a development of this nature/quantum is considered acceptable in accordance with current policy and guidance.

7.4 Design

Demolition Works

7.4.1 The application proposes the demolition of the work shop and office buildings on the middle site and of the 1970s control room to the rear of the front site. Given the wording of the MDO designation, in design terms there is no in principle objection to the loss of these buildings subject to the quality of the replacement development.

Impacts upon the Special Interest and setting of the Grade II listed 8 Albert Embankment and upon the Albert Embankment Conservation Area

7.4.2 8 Albert Embankment is a very impressive building of great dignity and formality. It sits comfortably in the townscape with spaces to each side. The fine detailing, proportions and massing are all very carefully considered. The roof top is very carefully handled, with central and flanking ‘pavilion’ features. There is much good detailing on the building – grilles, doors, brickwork, carving, mouldings, fenestration etc. The flanks are treated as well as the façade and are important elements in views from Albert Embankment, the river and the other side of the river. The rear elevation is more utilitarian but has much historical interest. It is largely intact and reflects practical requirements that existed when the building
was designed. The massing, tiered balconies and solidity of the forms are of particular importance.

7.4.3 The building as it currently exists retains numerous features of interest internally. The plan form appears largely original. The memorial halls, stairwells, fixtures and fittings etc, poles, recreation rooms, conference room etc. are all of interest. However, it is accepted that much of the other internal fabric of the building has been altered or is extremely plain / utilitarian to the point of having no aesthetic interest.

7.4.4 The council’s conservation and design team, external parties (English Heritage, 20th Century Society and the GLA), local MPs, councillors and residents all express the opinion that the internal alterations, extensions and new buildings would cause harm (to a greater or lesser degree) to the special interest of the listed building and to its setting.

7.4.5 The harm to the special interest of the listed building can be summarised as follows:

Externally, the single storey roof extension would necessitate the demolition of the two side ‘pavilion’ on the existing roof and add additional bulk and mass to the building. The glazed addition would challenge the carefully considered silhouette of the original form at odds with the receding roof forms of the historic building. Further to this, the existing secondary roof elements to each end of the façade (containing lift over-runs) are extended upward and given modern metal copings; increasing their dominance in terms of the hierarch of roof forms. At the rear these extended elements are given large decorative grills at high level; the pattern of which is taken from the ornamental ironwork on the ‘headquarters’ frontage façade and which is not entirely appropriate to the functionalist character of this rear elevation.

The concrete podium deck, required to mitigate against the ‘unneighbourly’ activities undertaken in the fire station yard, would remove the opportunity to appreciate the rear elevation as a whole entity and as a recognisable fire station.

The rear infilling of the deck access parts on the upper floors and the loss of the externally expressed pole housing would also prove harmful to the heritage interest of the building, as the deck access is evidence of the original residential use for the fire personnel and the pole housing a key feature of the fire station itself.

In addition, quite a few of the remaining original window openings on the remaining part of the rear elevation are being altered/replaced to suit the new internal layouts.

In terms of the setting of the building, the substantial bulk of building D, which rises up behind the listed building, would have a detrimental impact on the setting of the listed building in views from Lambeth Bridge and on Millbank.
Internally, the works largely reorganise the plan form of the building to better suit the future operations of the fire station and the introduced residential use.

7.4.6 In light of the identified harm to the special architectural interest and setting of the fire station, it is further considered that the development would have a detrimental impact upon important medium and distant views; within which the Fire Brigade Head Quarters and the Listed Drill Tower currently contribute positively to the quality of townscape in this location. The development would therefore fail to preserve the special historic and architectural character of the Thames Policy Area and the character and appearance of the Albert Embankment Conservation Area.

7.4.7 Whilst cumulatively the works are considered harmful to the special interest of the heritage assets, officers do not consider this harm to be substantial. Notwithstanding, where the harm is acknowledged, it is the case that the development is not in accordance with the development plan; namely UDP Policies 33, 36, 40, 41, 43, 45 and 47 and Core Strategy Policies S9 and PN2. In this context Members will have to be satisfied that the planning merits of the scheme presented are sufficient to offset the harm identified. Members will need to have particular regard to Policies HE9 of PPS5 which set out that there should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Policy HE9.1 sets out specifically that substantial harm to or loss of a grade II listed buildings should be exceptional. If Members agree with officers that the harm identified is less than substantial, then Policy HE9.4 of PPS5 sets out that Members will need to (i) weigh the public benefit of the proposal (for example, that it helps to secure the optimum viable use of the heritage asset in the interests of its long-term conservation) against the harm; and (ii) recognise that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss.

7.4.8 Weighing against the harm identified to the special historic and architectural interest of the building is the retention of the fire station on the site. This building has significant historic association with the fire brigade and the continued use of the building for such is a significant and valuable asset. English Heritage’s guidance on historic fire stations explicitly sets out that “the retention of use is a priority, which may mean that certain flexibilities in accommodating change should be accepted where otherwise they would not be”.

7.4.9 The development would also remove the 1970s control centre and the restoration of the existing Grade II listed drill tower – both positive heritage aspects of the development.

7.4.10 The applicant has also made concessions from the scheme originally submitted/proposed in agreeing to chamfer off the winter gardens from the roof top glazed extension, to retain the 2nd floor control room in its current form (at the expense of a single residential unit) and to relocate the Obelisk within the site as part of a landscape/public realm strategy. It should also be noted that the development would retain the first floor recreation room and the second floor board (control and command) room. In addition the southern entrance lobby
(containing the memorials) is to be retained in form and layout largely as built, although it would be truncated and subdivided by a glazed screen and one of the memorials would be moved to provide a backdrop to the new fire station reception desk. These matters are all positive aspects of the scheme in terms of retaining heritage value.

7.4.11 In addition the scheme offers significant planning benefits to the local community as is set out in section 7.1 above.

7.4.12 The applicant has also submitted evidence to demonstrate that the residential accommodation provided within building A as part of the roof top extension, the rear infill extension and the associated alterations are necessary to cross subsidise the delivery of the fire station.

7.4.13 Officers are of the opinion that on balance the planning and public benefits of the scheme as identified would sufficiently offset the harm identified with regards to the historic and architectural interest of the listed building, to the townscape setting of the listed building and to the character and appearance of the conservation area.

**Impact Upon Vauxhall Gardens Conservation Area**

7.4.14 Building G, to the other side of the railway tracks, would be within the Vauxhall Gardens Conservation Area. This side of the tracks has a very different character to the main application site. Here the conservation area is characterised by a 19th Century development along the south side of Black Prince Road and the remaining part of the former Beaufoy School on Newport Street. The building heights here range from two storeys to 3 ½ storeys around the junction of Newport Street and Black Prince Road.

7.4.15 Proposed building G is, by contrast, 5 storeys in height. Notwithstanding that the applicant has now acceded to the removal of the 'saw tooth' roof form and roof garden (shown on the originally submitted drawings), the building would remain noticeably higher than its immediate neighbours. As a result it may appear dominant within the street scene and its large bulk and mass may be considered to intrude and act as a barrier between former Beaufoy School Ragged School (an undesignated heritage asset) and the rest of the conservation area.

7.4.16 It has been argued that the scale and massing of building G would fail to preserve the character or appearance of the Vauxhall Gardens Conservation Area which, if Members consider is excessive, would not be in accordance with the development plan; namely UDP Policies 33 and 47 and Core Strategy Policy S9.

7.4.17 Again however, officers are of the opinion that on balance the planning and public benefits of the scheme as identified would sufficiently weigh against the harm identified and allow for the grant of planning permission in departure to the current development plan policy.

**Tall Buildings in this Location, Impacts Upon LVMF Views and Other Heritage Assets**
7.4.18 The tall buildings strategy of the VNEB OAPF anticipates that tall buildings will come forward on Albert Embankment to a maximum threshold c.80m. The development falls below this threshold.

7.4.19 The development would be within the background of protected views from Parliament Hill and Primrose Hill, but would not be visible as it would be obscured in these views by existing development. As such the development would unlikely impact upon strategically important landmarks such as St Pauls or Westminster.

7.4.20 The development would be visible in the south-facing river prospect view from Westminster Bridge, but would be viewed against existing and proposed buildings of similar heights. In the circumstances it is considered that the buildings would have no negative impacts on any protected views, or the setting of the World Heritage Site at Westminster.

7.4.21 The grade-II listed Southbank House is outside of the application site but directly abuts its southern boundary. Although taller buildings would be built directly behind/adjacent to Southbank House, this building is appreciated predominantly from close, street level views. It is considered that the development would not prove unacceptably harmful to the special interest and setting of South Bank House.

7.4.22 Lambeth officers also note Westminster’s objection to the development, but do not agree that the development would unacceptably harm the character, appearance or setting of the conservation area or any listed buildings on the Westminster side of the river.

7.4.23 Having considered all representations received, officers are satisfied that the development would not harm any other heritage assets of recognised importance.

**Scale, quantum and layout of new development**

7.4.24 Setting aside the impacts of the development upon the special interest of the listed fire station and the conservation areas, it is considered that the layout of the buildings and the position and orientation of the slab blocks establish a clear order which works well with the local context.

7.4.25 The overall height of building B achieves an appropriate subordinance and visual separation to the frontage building of Albert Embankment and to the Grade II listed drill tower, whilst the separation distance to building D would provide an improvement in the public street environment between the buildings. The height and scale of building B is not thus considered objectionable.

7.4.26 In addition, the single storey nature and location building C is considered acceptable, having regard to historic building constraints of the site. The building is sufficient diminutive and set back so as to retain views of the drill tower from Albert Embankment and to retain the perceived separation of the fire station building from the IMO building.
7.4.27 Whilst the heights of buildings D and F would prove harmful to the setting of the listed building of the front site, it is considered that the perimeter approach to the redevelopment of the middle site is both logical and acceptable, having regard to the design constraints imposed and the planning benefits derived from providing the podium amenity space for the future residents of the scheme. The 5 storey scale of building E(N) responds to the scale of development within Whitgift Street to which E(N) would present; whilst building E(S) is of similar height and scale to South Bank House adjacent to which that would sit.

7.4.28 Putting aside the height concerns expressed regarding building G, this element of the scheme would nevertheless optimise the use of this part of the site without undue harm to the amenity of neighbouring residential properties. It is noted that no windows are proposed to the rear of the site, facing the Ragged School, so as to minimise potential conflict with the more commercial operations of that property.

Appearance/Architecture of buildings B to G

7.4.29 The development proposes an interesting architectural language referencing the homogenous, modular fenestration arrangement prevalent along the Embankment. The buildings would use a steel frame to extrude elements such as balconies and canopies beyond the building surface, resulting in a series of projections creating aesthetic interest and relief.

7.4.30 The material palette has some contextual elements including the red bricks that pick up on the red/orange terracotta tones of Southbank House. Blocks D, E(N), E(S) and F would be constructed in brown brick, which also relates well to the predominant material/colour in the area.

7.4.31 Whilst the extensive use of mesh and perforated metal could potentially appear quite harsh, this will be reliant upon the tone and texture of metal proposed. Moreover, the quality of the materials and the detailing can be ensured to officers’ satisfaction through the recommended planning conditions.

7.4.32 Building G would be more refrained in appearance, not utilising the extruding elements. This building would be constructed in brick work with more conventional window and balcony openings.

7.4.33 It is accepted that buildings B to G would present an acceptably high quality of architecture. The development would provide a modern development in appearance. The proposed materials are acceptable in that they would provide a high-quality finish to the development. Full details and a schedule of materials could be secured by way of planning condition to ensure the resultant quality of the development.

Landscaping

7.4.34 Although the level of direct sunlight into the internal courtyards would be limited (especially during winter months), the highly developed urban context of the
spaces is understood, and it is considered that the public realm and landscaped areas would provide welcoming and attractive spaces for future users.

7.4.35 Full details and implementation of an appropriate landscaping scheme for the whole development (including the provision of children’s play space and the treatment of the public piazza) could reasonably be secured by way of planning conditions; including provisions for its ongoing maintenance after implementation. Such a landscaping scheme could reasonably include provisions to enhance the bio-diversity value of the site and could act to provide wind shields to improve the environment in accordance with recommendations contained within the Environmental Statement.

Re-animation of Lambeth High Street

7.4.36 The provision of the public space between the front and middle sites and the active frontages that would present thereupon, would contribute significantly to the re-animation and regeneration of this part of Lambeth High Street. Such would be in compliance with objectives of current planning policy for the site; including the specific requirements of MDO4. Full details of the laying out of the public realm could be secured by way of planning condition.

7.4.37 The re-animation of this part of Lambeth High Street and the regeneration benefits that such would provide within this opportunity area are considered significant planning benefits that weigh in favour of approval.

Design Conclusions

7.4.38 Officers acknowledge that the development would prove harmful to the special interest and setting of the Grade II listed 8 Albert Embankment. In addition, the development would prove harmful to the character and appearance of the Albert Embankment Conservation Area and the Vauxhall Gardens Conservation Area. In these respects officers are mindful that the development is not in accordance with the development plan; namely UDP Policies 33, 36, 40, 41, 43, 45 and 47 and Core Strategy Policies S9 and PN2. Notwithstanding, the benefits of the scheme to the local community are on balance considered sufficiently substantial to justify the recommendation to grant planning permission.

7.4.39 In all other regards the development is considered acceptable in design terms, subject to the recommended conditions set out at the end of this report.

7.5 Sustainability

7.5.1 Policy 35 of the UDP sets out that all development proposals should show, by means of a Sustainability Assessment, how they incorporate sustainable design and construction principles.

7.5.2 Policy S7 of the Core Strategy commits the council to ensuring that future development, including construction of the public realm, highways and other physical infrastructure, achieves the highest standards of sustainable design and construction and subsequent operation. The policy states that in particular this
will be achieved by requiring all major development to achieve a reduction in carbon dioxide emissions in line with London Plan targets through energy efficient design, decentralised heat, cooling and power systems, and on-site renewable energy generation, and requiring all other developments to achieve the maximum feasible reduction in carbon dioxide emissions through these measures.

7.5.3 With specific regard to Vauxhall, Policy PN2 of the Core Strategy sets out a support for the highest standards of sustainable design and construction and the implementation of district heating networks and other effective forms of CO₂ reduction and climate change adaptation, including innovative approaches, in line with London Plan policies.

7.5.4 The climate change policies as set out in chapter 5 of the London Plan collectively require developments to make the fullest contribution to the mitigation and adaptation to climate change and to minimise carbon dioxide emissions. Policy 5.2 sets out a minimum target reduction for carbon dioxide emissions in buildings up until 2013 of 25% over the Target Emission Rates outlined in the national Building Regulations. The London Plan requires developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures and prioritising decentralised energy, including renewables. Policy 5.2 specifically sets out that developments should follow the following energy hierarchy:

1 Be lean: use less energy
2 Be clean: supply energy efficiently
3 Be green: use renewable energy

7.5.5 The London Plan is inclusive of specific policies to ensure that: the highest standards of sustainable design and construction are achieved (Policy 5.3); developments evaluate the feasibility of Combined Heat and Power systems (Policy 5.6); Major developments should incorporate renewable energy generation (Policy 5.7); developments reduce potential overheating and reliance on air conditioning systems (Policy 5.9); developments should incorporate green infrastructure and green roofs, where feasible (Policies 5.10 and 5.11); and that development should minimise flood risk and utilise sustainable drainage (Policies 5.12 and 5.13).

7.5.6 The council’s policies are supplemented by the Council’s adopted Supplementary Planning Document entitled Sustainable Design and Construction (2008).

Be Lean

7.5.7 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by Building Regulations. Other features proposed include the use of mechanical ventilation with heat recovery, energy efficient lighting and optimised controls. Submitted information suggests that the development would achieve carbon emission reductions of up to 10.44% across the development compared to minimum Part L 2010 Building Regulation
requirements.

**Be Clean**

7.5.8 The development is within the VNEB OAPF, where there are plans for a district energy network. The development has been designed to allow for future connection to an external district heating network when the opportunity arises. This is welcomed.

7.5.9 Energy centres are proposed on the front, middle and rear sites. The development will be constructed in phases. Phase 1 will involve the building and refurbishment of the front site and as part of this efficient boilers in building B will temporarily fulfil the full heating demand of buildings A (residential) and B upon completion of Phase 1. The fire station will be served by its own dedicated heating plant and a micro CHP unit. Connection will be provided from this heating system to the wider development network. Phase 2 of the Development will include the middle and rear sites. The centralised energy centre will be based in building F and will have a CHP engine which will provide heating to the middle and front sites, the existing boilers in the front site will then consequently be used to provide backup and additional peak loads. The rear site will be developed completely independently from the front and middle sites and incorporate its own heating plant due to the restrictions of the railway line. Lambeth officers are generally accepting of the strategy to provide energy centres across the development, given the site/development constraints.

7.5.10 It is anticipated that a reduction in regulated carbon dioxide emissions of 19% will be achieved through this second part of the energy hierarchy.

**Be Green**

7.5.11 The development is proposing the installation of photovoltaic (PV) panels to secure a further reduction in carbon emissions of 1% over and above those secured due to the energy efficient design and the combined heat and power supply. The potential for greater contributions from PV Panels are constrained due to the limited roof space, especially where green roofs are also proposed. Lambeth and GLA officers also accept that the potential for other renewable technologies is constrained to a large degree due to the characteristics of the site and to the extent to which they could be successfully integrated with the CHP supply.

**Climate Change Adaption**

7.5.12 The application has prepared a sustainability statement that follows the Mayor’s SPG. A series of measures are proposed, which would together assist in the development achieving Code for Sustainable Homes ‘Level 3’ for the residential element and BREEAM ‘very good’ for the non residential uses; including sustainable construction practices, the installation of energy efficient appliances, 100% water metering and low flow appliances, the implementation of a waste strategy and water conservation measures. A grey water recycling system is proposed for the fire station and it is intended that the scheme will achieve 50% attenuation of the site’s surface water run-off at peak times using sustainable urban drainage systems and green/garden roofs. These measures are strongly supported.
7.5.13 In the circumstances it is considered that the council may be satisfied that conditions and s.106 obligations could ensure that the development achieves the highest standards of sustainable design and construction and the implementation of district heating networks and other effective forms of Carbon Dioxide reduction and climate change adaption, in accordance London Plan Policy and with Core Strategy Policies S7 and PN2.

7.6 Neighbouring Amenity

7.6.1 Policy 7 of the UDP sets out that the right of people to the quiet enjoyment of their homes will be respected.

7.6.2 Policy 29 relates to potential impacts upon residential amenity from food and drink and late night uses.

7.6.3 Policy 33 of the UDP sets out that the scale and design of buildings should protect the residential amenity of existing and future residents by having an acceptable standard of privacy; having an acceptable impact on levels of, and impact on daylight and sunlight; not creating unacceptable overlooking; not creating an undue sense of enclosure; and where appropriate, having sufficient outdoor amenity space.

Daylight/Sunlight

7.6.4 The application was accompanied by a daylight, sunlight, overshadowing, light pollution and solar glare assessment. The assessment was referred to GL Hearn for independent verification of the findings.

7.6.5 GL Hearn express the opinion that the impact of the proposed development on surrounding residential properties is on the whole acceptable given the urban location of the site. It should be noted that the residents of Whitgift House would notice a significant reduction in their existing daylight levels; however, their existing daylight levels are somewhat high given the location of the property.

7.6.6 The analysis submitted by the applicant as part of the ES shows that all but one of the Whitgift House windows tested will fail the BRE Report guideline values for VSC, with the majority of the percentage reductions ranging between 40-59%, against a BRE Report guideline value of a reduction of no more than 0.8 times (a 20% reduction) of the existing values.

7.6.7 In addition, the daylight distribution assessment indicates that, at ground floor level, all rooms will fail the BRE Report guidelines with reductions ranging between 55%-61% [NB: BRE guidelines recommend no more than a 20% reduction]. At first floor level, once again, all rooms will fail the BRE Report guidelines for daylight distribution with reductions ranging between 43-51% for all but one room, which will be reduced by 27.1%. At second floor, 10 rooms will fail the BRE Report guidelines for daylight distribution, with reductions between 20-30%. At third and fourth floors, only one fails the BRE Report guidelines for daylight distribution each floor, each one recording a reduction of only 20.2%.
7.6.8 The EIA Chapter then also details results for the average daylight factor assessment which indicates that all but one room will meet the British Standard recommendations for their room types. Room R12/600, a living room, will achieve only 1.48% ADF which is only fractionally below the 1.5% target given in the BS.

7.6.9 The EIA Chapter states that room usages and sizes for this building have been determined from a plan obtained for the flats within the block. However, the ADF calculation relies upon data regarding transmittance values, internal reflectance values of the surfaces within the rooms and details of the total area of the room surfaces. If access to the flats was not gained, then assumptions would have to have been made regarding the surface coverings, ceiling heights and any maintenance correctional factors required of the windows serving the rooms.

7.6.10 The use of the ADF assessment within daylight and sunlight amenity studies is an arguable point. Whilst the BRE Report does state that the Report is intended to be used in conjunction with the recommendations in the British Standard, it is not referred to in Section 2.2 of the BRE Report as one of the methods of assessment to be used, nor is it referred to in any way in the Decision Chart at figure 10 within the report. Appendix C Interior Daylighting Recommendations of the BRE Report details the application of the average daylight factor and is focused on room and window design rather than the effect of developments on adjoining buildings.

7.6.11 More latterly, the applicant have provided a plan drawing showing the no skyline contours (daylight distribution) for Whitgift House. The drawing also gives the room types and layouts used in the ES analysis. The drawing shows there will be significant areas of loss at ground and first floor levels. GL Hearn advise that “it should be noted however that in the existing scenario these rooms are fully lit, which, given the urban location, is unusual. The proposed development, where it faces the property, is of a similar height and mass to 1-24 Whitgift House. This arrangement of similar height buildings is typical in this location but would normally limit daylight access to lower levels within properties. Therefore [GL Hearn] consider the daylight distribution values achieved with the proposed development in place are acceptable”.

7.6.12 Moving on to sunlight amenity, 28 of the 63 windows assessed at Whitgift House would not meet the BRE Report sunlight criteria. However, 25 of these windows only fail the guideline values by falling short of the 5% guideline value for winter sunlight. Experience shows that winter sunlight access is difficult to achieve in urban settings. As such, the effect on the sunlight amenity to this property is considered acceptable.

7.6.13 57-67 Newport Street would suffer VSC reductions exceeding the BRE guideline values to 14 of the 20 windows analysed; although only three of the 16 rooms assessed would fail to meet the BRE criteria for daylight distribution and only by between 1.6-5.7%. As such it is considered that the effect on this building’s daylight amenity would be acceptable.
7.6.14 At 73-79 Black Prince Road, all but one of the 16 windows assessed would fail the BRE guide for the VSC assessment and 6 of the 16 rooms assessed would not meet the daylight distribution criteria. The applicant has however provided information to show that all of the rooms analysed are bedrooms. It should be noted that the BRE Guide considers daylight distribution within bedrooms to be less significant than daylight distribution to living rooms, dining rooms and kitchens. Therefore, given the evidence supplied officers consider the daylight levels within these bedrooms to be acceptable.

7.6.15 At 8 Salamanca Place, 52 of the 104 windows assessed would fail the BRE guidelines for VSC. However, only two of the 68 rooms assessed would fail the daylight distribution guidelines. As such, it is considered that the effect on this building's daylight would be acceptable.

7.6.16 At 9 Salamanca Place, a small number of windows (15 out of 67) would fail the BRE guideline values for VSC. However, all of the rooms assessed would meet the daylight distribution guidelines. Given the overall level of compliance it is not considered that this level of reduction would be particularly noticeable to the occupants.

7.6.17 The effect on the building's sunlight is more noticeable; 10 out of 14 windows assessed would fail the BRE guide recommendations for both winter and annual sunlight targets. The information supplied would indicate that the windows analysed for sunlight access serve bedrooms. In this regard the BRE Guide considers sunlight to living rooms of greater importance than that to kitchens and bedrooms. Therefore the impact on sunlight to these windows should be considered as acceptable.

7.6.18 At 17 Lambeth High Street, there would be some isolated failing of the BRE report guidelines; however, the majority of the windows/rooms would pass at least one of the tests and, overall, it is considered that the effect on this building would be generally acceptable in terms of daylight. The effect on the buildings sunlight is more noticeable, although the actual reduction in hours is relatively modest and considered acceptable.

7.6.19 At the more recent residential development along from Whitgift House, some significant vertical sky component reductions would be recorded to the lower floors, although the daylight distribution would be met by all rooms assessed. As such, the effect on this building's daylight is considered acceptable. In addition, levels of sunlight will generally be acceptable, albeit with some isolated failures.

7.6.20 At the Queens Head Public House four of the seven windows assessed would fail the BRE criteria for the VSC assessment; two of the five rooms assessed would fail the daylight distribution assessment although quite high levels of average daylight factor would be maintained. It is considered that the daylight distribution within the analysed rooms will remain acceptable.

7.6.21 At the Windmill Public House, again there would be some reductions in excess of the BRE criteria, although all rooms would meet the daylight distribution test. It is
considered that the effect on this property’s daylight would be acceptable and that good overall levels of sunlight would also be maintained.

7.6.22 No other properties would experience loss of daylight or sunlight below recommended BRE guidelines.

7.6.23 In summary the daylight and sunlight impacts of the development have been independently verified by GL Hearn, who express the opinion that the impact of the proposed development upon surrounding residential properties is on the whole acceptable given the urban location of the site. Officers accept GL Hearn’s advice, having regard also to the nature of development envisaged to come forward in this part of the opportunity area and to the other planning benefits that would be derived from the scheme were it implemented.

Light Pollution

7.6.24 At this stage of the planning process, the internal and external lighting schemes for the proposed development have not been confirmed. However, there is no evidence to suggest that the development would prove harmful to the amenity of neighbouring properties by reason of light pollution. A lighting strategy and management plan for the development could be secured by condition to ensure that such would not prove harmful to neighbouring amenity.

Privacy/Outlook

Salamanca Place:

7.6.25 Building B of the front site is located at the corner of Black Prince Road and Lambeth High Street and would present directly to residential properties to the front of Salamanca Place to the southern side of Black Prince Road. The building in this location would reach eight storeys in height. There would be a separation distance of some 12m (the width of Black Prince Road) between these properties, which include facing windows. However, such proximate relationships would merely replicate those that already existing between the residential units towards the rear of Salamanca Place and South Bank House. The proximate relationships therefore are reflective of the established urban grain of the vicinity and the high density occupation of this central London location. Where such proximate relationships are an accepted feature of central London locations, it is considered that the impact of the development upon the privacy and outlook of the Salamanca Place properties that directly face building B could not be substantiated as a reason for refusal.

7.6.26 Buildings D and F, the 15 and 13 storey elements of the scheme, would be located some 40m from any residential properties on Black Prince Road and are in any event separated from such by South Bank House.

Whitgift Street:

7.6.27 Whitgift House is some five storeys in height and located to the north of the middle site. It would directly face Building E(N) at a distance of some 18m. Building E(N) would also be five storeys in height. The separation distance between the properties is considered sufficient to retain adequate outlook and privacy to the Whitgift House properties.
7.6.28 Further along Whitgift Street, before the railway viaduct, is a six storey residential development. At this location the separation width between the flank of building F and the six storey development would be 12m. However, given this central London location and that the development proposed is a perimeter development around an established urban block, it is considered that the proposed development would not unduly impact the residential amenity of the occupiers of those existing dwellings with regard to outlook and privacy.

Lambeth High Street:
7.6.29 There is a row of two storey terraces along Lambeth High Street directly to the other side of Whitgift Street. The northern flank of building D (15 Storeys) would present directly to the flank of the terrace. There are however no windows located in that flank of that terrace so that whilst the scale of development would be obviously different, it would not directly impinge upon the privacy and outlook current experienced at those properties.

Rear site:
7.6.30 It is considered that Building G on the rear site, by reason of the physical separation to neighbouring residential properties by Black Prince Road and Newport Street, would not unreasonably impact upon the existing levels of privacy and outlook of the neighbouring residential properties.

South Bank House:
7.6.31 Whilst it is acknowledged that Building E(S) would be located in close proximity to South Bank House, South Bank House is in employment use. The internal environments, in terms of privacy and outlook, are not afforded the same level of protection as residential properties under current development plan policy.

Proposed Uses
7.6.32 The development would not introduce any uses that need prove unacceptably harmful to the residential environment of the locality.

7.6.33 Residential uses in this locality would be consistent with other uses in the vicinity, including Whitgift House and the newer residential development on Black Prince Road.

7.6.34 The noise monitoring exercise that was undertaken as part of the ES on and in the vicinity of the site took into account existing noise that was generated by the operational Fire Station. Because the operational patterns of the Fire Station would remain unchanged, it is considered that the potential impacts of the new Fire Station on existing Noise Sensitive Receptors would be negligible.

7.6.35 Commercial B1 office floorspace is, by definition, “a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit” (Town and Country Planning (Use Classes) Order 1987). There is no reason to suggest that the proposed office uses would be of a particular nature that would prove harmful to neighbouring residential amenity.
7.6.36 In terms of the proposed active frontage uses, including potential A3/A4 proposed food and drink use, such uses are appropriate in this location given its position within the central activities zone and the policy objectives of the UDP (MDO4) to re-animate this part of Lambeth High Street. Conditions could reasonably be imposed regarding hours of operation and management measures so as to minimize potential impacts.

**Impacts During Construction**

7.6.37 It is inevitable that there would be an element of noise, disturbance and inconvenience during the construction period. However, it would not be reasonable to refuse planning permission on this basis. The Environmental Statement submitted sets out a range of measures that would minimise such impacts as far as is reasonably practicable and these matters could suitably be dealt with by way of planning conditions.

7.7 **Crime**

7.7.1 The application submissions set out that the development would be designed and constructed to meet Secure by Design standards. In addition, s106 monies are to be secured to improve the railway tunnel in Black Prince Road. Such monies could be used to improve lighting and potentially CCTV coverage. This is the main route through to the nearest play space for this development – Pedlars Park.

7.7.2 Such matters could be ensured by way of planning condition and s106. In this regard the development therefore need not fail against Policy 32 of the UDP and Policy S9 of the Core Strategy.

7.8 **Archaeology**

7.8.1 The front and middle sites fall within an archaeological priority zone as designated on the UDP proposals map. In this context English Heritage have reviewed the Archaeological Assessment which forms part of the ES. They raise no objections to the application, subject to the archaeological position being reserved by way of attaching a condition to any consent granted.

7.8.2 Officers accept English Heritage’s advice. Subject to suitable conditions, the development need not fail against the objectives of Policy S9 of the Core Strategy.

7.9 **Contaminated Land**

7.9.1 In summary, contamination within the Site is assessed as posing a low risk to identified receptors assuming that adequate remedial and/or protection measures are implemented prior to the commencement of, and where necessary during, demolition and construction works. Assuming the proposed mitigation measures set out in the ES are adopted, residual effects arising from ground conditions at the site are unlikely to be significant either during or following redevelopment. A
condition of consent could ensure that this is the case so as meet the objectives of PPS23 (Planning and Pollution Control).

7.10 Bio-diversity/Ecology

7.10.1 The results from a desk-based data search and an ecological site survey indicate that the site is currently of negligible ecological value. There is thus no current evidence to suggest that the redevelopment of the sites themselves would result in the loss of any existing flora or fauna at the site of identified importance; and in any event such, if identified during demolition, would be suitably mitigated through following standard best practice as is proposed. In addition, the extent and nature of the ecological enhancements proposed as part of the completed development would result in an overall improvement in the biodiversity value of the site. This would include the introduction of new habitats in the form of green roofs and native landscape planting, as well as enhanced bird nesting opportunities.

7.10.2 The council’s Parks and Greenspaces Department have raised concerns that Lambeth High Street recreation ground is already heavily overshadowed and that the proposed development will increase this to a degree which will have a detrimental effect on the quality of the park, especially in winter months. They further advise that the increased overshadowing will inhibit the development of trees and vegetation, encourage dampness and moss growth and reduce the amenity value of the park as whole.

7.10.3 It is acknowledged that the development would increase the levels of overshadowing to the nearby Lambeth Recreation Ground and that such would have an adverse impact in terms of inhibiting the development of trees and vegetation and in encouraging dampness and moss growth. However, given the central London location, the nature of development envisaged to be brought forward within the opportunity area, the transient nature of the overshadowing and the planning benefits that the development would otherwise present, on balance it is considered that the harm identified is insufficient to weigh against the planning merits of the scheme.

7.11 Management of Surface Water/Flood Risk

7.11.1 Policy S6 of the Core Strategy commits the council to working with the Environment Agency in order to manage and mitigate flood risk.

7.11.2 The application is accompanied by a Flood Risk Assessment which has been referred to the Environment Agency for comment. Officers accept the Environment Agency’s advice and thus conclude that subject to suitable conditions, the development need not fail against Core Strategy S6.

7.12 Transport Matters

Site, Accessibility & Traffic Impact
7.12.1 The site is located in an area with exceptional access to public transport (PTAL 6a); with the Vauxhall Transport hub located close by providing access to Underground, National Rail and numerous bus services. Waterloo Station and Lambeth North Underground Station are also located within a reasonable walking distance of the site.

7.12.2 The underground, walking, bus trips and cycling are likely to be the best used forms of transport associated with the development. Given the access to alternatives and the various measures proposed as part of the development (the cycle parking, the car club spaces, the travel plan and the removal of the resident’s eligibility to obtain parking permits for the surrounding streets), it is estimated that the use of private vehicles in association with the development would be low. Lambeth officers accept that there would only be a limited impact on any of the junctions immediately surrounding the site and that no significant impact on traffic flows or junction capacity would result.

Car Parking

7.12.3 The applicant has submitted that the London Fire Brigade require a total of 21 car parking spaces for operational purposes. Whilst a relatively high level of operational car parking, this is accepted by officers in light of the size and strategic importance of this station.

7.12.4 Aside from the operational car parking, it is proposed to provide a further 69 spaces for the residential units and 2 disabled spaces for the commercial uses. Relevant parking standards for this development are contained in both the London Plan and the draft Vauxhall Nine Elms Battersea Opportunity Area Planning Framework which both state that developments in areas of high public transport accessibility and within the Opportunity Area in particular should provide a restrained level of car parking to promote sustainable modes of travel and to limit traffic generation from the development. London Plan standards require that parking provision is significantly below 1 space per residential unit and the VNEB OAPF states that the maximum provision across the OA should be 0.25 spaces per residential.

7.12.5 The 69 spaces for the residential element of the scheme accords with the 0.25 ratio set out in the VNEB OAPF. Officers would encourage a lower level of provision and it is noted that other recent residential developments in the vicinity have proposed lower levels of car parking ranging from zero to 0.2 spaces per unit. However, the applicant is keen to provide this level of parking for “planning and commercial reasons”. It should be noted that the parking to residential unit ratio has been reduced from 0.5 (in the original and subsequent planning submissions) to the 0.25 now proposed.

7.12.6 In addition, the development is proposing 6 on-site car club spaces, would ensure that 1 in 5 spaces provide an electrical charging point to encourage the uptake of electric vehicles and would provide at least 6 disabled parking spaces for the residential units. The residents of the development would be provided with membership of the car club for a minimum of 1 year; such matters would be secured by way of the s106 agreement and would further reduce the reliance on...
private cars. Each of these facets would accord with the relevant policies and standards of the development plan.

7.12.7 The site is also contained within CPZ Kennington “K”, which operates Monday to Friday 8:30am to 6:30pm. In the circumstances the applicant has acceded to a permit free development; whereby all occupiers of the dwelling units, unless they are the holder of a disabled persons badge issued pursuant to Section 21 of the Chronically Sick and Disabled Persons Act 1970, shall be ineligible to be granted a permit to park a vehicle in a residents’ parking bay located in the vicinity of the application site. As such it is considered that the council may be satisfied that the development would not impact unacceptably upon levels of parking stress in the area.

Vehicle and Pedestrian Access
7.12.8 Given the large and spread-out nature of the site there are several vehicle accesses proposed. Two would serve the front site, from Lambeth High Street; and two would serve the middle site, with one from Whitgift Street for the access to the street level and basement car parks and a further access from Lambeth High Street. No vehicular access is proposed for the Rear site. The existing vehicle accesses on to Albert Embankment that serve the fire station are also to be retained but these are to be used solely in relation to the operational needs of London Fire Brigade.

7.12.9 The Front site has pedestrian accesses from Albert Embankment and from Lambeth High Street. There are further means of pedestrian access in to the building from the basement car park via lifts. The Middle site has numerous pedestrian accesses serving the residential and commercial uses and these are from both Lambeth High Street and Whitgift Street. Again lifts provide direct access in to the buildings of the middle site from the basement car park. The rear site has pedestrian access from Newport Street.

7.12.10 These access arrangements are considered logical and appropriate for the nature of the development proposed.

Servicing
7.12.11 Servicing arrangements would vary across the site with a combination of on-street and off-street servicing arrangements proposed. The applicant suggests that all servicing for the front site would be undertaken on-street from Lambeth High Street. Lambeth High Street is lightly trafficked and thus officers accept that the impact would not be substantial. The Middle site would provide off-street servicing provision and this would be used by all users on this part of the site. The rear site would be serviced on-street.

7.12.12 These servicing arrangements are considered acceptable in principle. The submission of a Servicing and Delivery Management Plan should be secured by condition.

Refuse Storage
7.12.13 There are several areas designated throughout the development site and in terms of the middle and rear sites there appears to be a good provision for all units. The
proposed storage area for the residential units in building A is very small and would not provide sufficient capacity for the units. Notwithstanding, the applicant is proposing that a concierge would collect refuse from these areas and move it to the larger store accessed from Lambeth High Street. This system would be acceptable but does rely on the permanent presence of a concierge for the life of the development. A Waste Management strategy would be secured by way of the recommended conditions.

**Cycle Parking**

7.12.14 Cycle parking is proposed to be provided so as to meet London Plan minimum requirements. A total of 371 cycle spaces are proposed with 334 for residents, 34 for the offices and 2 for the retail and restaurant uses.

7.12.15 The majority of the cycle parking is proposed within large communal facilities. Whilst these arrangements do not necessarily encourage a high level of use due to their relative inaccessibility and lack of security, they are technically acceptable. A condition of consent is recommended to secure the cycle parking.

**Travel Plan**

7.12.16 A draft framework Travel Plan has been submitted and this sets out broad objectives and targets, the management approach, the strategy for promoting sustainable transport modes and monitoring and review measures. This draft will need to be updated, but can be secured and further developed through the s106 agreement.

**Streetscape and Public Realm Improvements**

7.12.17 The scheme requires the reinstatement of a redundant access on Albert Embankment that currently provides access in to the drill yard of the fire station. The applicant will need to agree this work directly with TfL and enter into the necessary s278 agreement.

7.12.18 The main element of highway work proposed is on Lambeth High Street between the Front and Middle sites, where it is proposed to create a shared surface and new public space. This is considered appropriate given the scale of the proposed scheme, and could significantly improve accessibility for pedestrians, cohesion of the site and the general amenity of the area. The delivery of these works would require a S278 Agreement and full details of the highway works would need to be submitted and agreed prior to occupation. The applicant would be responsible for the full cost of these works and the recommended condition would ensure that the development (other than the Fire Station) is not occupied until the highway works are substantially complete.

**Public Transport Impact**

7.12.19 TfL sets out an expectation for a significant contribution towards strategic transport improvements. The scale of this contribution must reflect the levels set out in the draft Section 106 Chapter (Feb 2011) and supporting VNEB Development Infrastructure Funding Study (Oct 2010). The applicant has acceded to this and is proposing a contribution of £4.675m. Such would be secured via the
s106 agreement and would be used for strategic infrastructure improvements in and around Vauxhall – including to the transport interchange.

7.12.20 Whilst officers acknowledge the existing capacity issues at the transport interchange, it is considered that the contribution would be sufficient commensurate to the scale of the scheme proposed so as to appropriately mitigate against its otherwise unacceptable impacts upon the public transport infrastructure. This is particularly the case given the permissive development context set out within the OAPF.

Transport Conclusions
7.12.21 It is considered that, subject to conditions and the package of s106 obligations, the development would suitably accord with all transport related policies of the development plan.

7.13 Refuse Storage
7.13.1 There is no reason to suggest that the proposed development could not reuse, recycle or compost a significant proportion of waste generated in the proposed commercial and residential units, in line with relevant legislation, planning policy and guidance. Subject to the submission, approval and implementation thereafter of a robust waste management plan for the site, in line with the commitments set out in the submitted Waste Management Assessment, officers are of the opinion that the development need not fail against Policy S8 of the Core Strategy.

7.14 S106; Impact Upon Local Infrastructure; and Benefits for the Wider Community
7.14.1 The Community Infrastructure Levy Regulations 2010 explicitly set out that planning permission should only be granted subject to completion of a planning obligation where the obligation meets all of the following tests. A planning obligation should be: (i) necessary to make the development acceptable in planning terms; (ii) directly related to the development; and (iii) fairly and reasonably related in scale and kind to the development.

7.14.2 Policy S10 of the Core Strategy sets out the circumstances in which planning obligations will be expected from developers. In particular it sets out that planning obligations will be sought to mitigate the direct impact of development, secure its implementation, control phasing where necessary, and to secure and contribute to the delivery of infrastructure made necessary by the development - subject to the particular circumstances of the development in question and the nature and extent of impact and needs created.

7.14.3 With specific regard to Vauxhall, Policy PN2 of the Core Strategy sets out that the council will ensure that development is linked with the wider area and that it secures benefits for the wider community through contributions to necessary social and physical infrastructure needs arising from development in particular for public transport, education and other community facilities and securing employment and training opportunities to address issues of worklessness in the
borough and the setting up of a local project bank in order to mitigate the impacts of development.

7.14.4 The Council’s adopted SPD on planning obligations sets out the circumstances where monies towards community infrastructure would generally be expected and a framework for calculating amounts that would likely be sought.

7.14.5 In addition, the GLA’s recently published VNEB Development Infrastructure Funding Study (DIFS)(October 2010) investigates the infrastructure required to support the delivery of Revised Scenario 5 of the OAPF. The Infrastructure Study suggests that a development of the quantum proposed and in this location would require a tariff contribution in the region of £7m to contribute towards the strategic infrastructure required; plus other more site specific requirements. The obligations proposed commit to the tariff contribution.

7.14.6 It is advised that the applicant currently proposes and/or accepts the following package of s.106 planning obligations, which are considered to satisfy the s106 tests set out in the Community Infrastructure Levy Regulations:

- **Affordable Housing**: Securing the provision of the 19 affordable housing units shown within the application submissions – 10 social rented units and 9 intermediate.
- **Access to the communal amenity spaces of the development**: The communal amenity spaces shall be made available for use by all residents within the relevant parts of the development.
- **Health Contribution**: £302k to be applied towards primary care purposes in the northern part of the Borough of Lambeth
- **Indoor Sport and Leisure Contribution**: £221k to be applied towards the provision of new and/or the enhancement of existing indoor sports and leisure facilities in the northern part of the Borough of Lambeth serving the needs of occupiers and users of the development
- **Libraries Contribution**: £59k to be applied towards new library provision and/or improvement works to the existing public library provision in the northern part of the Borough of Lambeth to increase capacity for use; and/or the provision of new library books and IT equipment to meet new population demand in the northern part of the Borough of Lambeth
- **Local Labour in Construction Contribution**: £302k to be applied towards providing training to persons with an interest in working in the construction industry and in particular in the provision of training opportunities in the construction of the development for construction trainees resident within the Borough of Lambeth
- **Local Labour in Construction Commitments**: to work with the Council to identify and promote opportunities for the use of local sub-contractors and construction workers for the construction of the Development; to use reasonable endeavours to identify training opportunities on the Application Site for construction trainees resident within the Borough of Lambeth; and to provide the Council with regular reports detailing the percentage of local employment on the Application Site during construction of the Development
- **Parks and Open Spaces Contribution**: £425k to be applied towards the provision of new and/or the enhancement of existing parks and open space
facilities in the northern part of the Borough of Lambeth serving the needs of occupiers and users of the development

- **Play Space Contribution: £39,833** to be applied towards the provision of new and/or the enhancement of existing play spaces for children and young people in the northern part of the Borough of Lambeth serving the needs of occupiers and users of the development

- **Primary Schools Contribution: £478,537** to be applied towards the provision of primary education facilities within the northern part of the Borough of Lambeth

- **Public Art Scheme**: a scheme to be submitted to the Council for its approval giving details of the Public Art to be provided within the application site to a cost of not less than £115k

- **Revenues Contribution: £49k** to be applied to the revenue cost to maintain facilities provided by planning obligations

- **Secondary Schools Contribution: £244,845** to be applied towards the provision of secondary education facilities within the Borough of Lambeth

- **Strategic Transport Contribution: £4,675,000** to be applied towards strategic transport improvements in the Vauxhall Nine Elms Battersea Opportunity Area.

- **Travel Plan and Travel Plan Monitoring Fee of £1,000**: Plan to be submitted for the council’s approval and thereafter operated and up-dated for the duration of the development.

- **Car Club**: to provide six Car Club Parking Space within the development and to offer free membership of the Car Club on the application site for the minimum period of 1 (one) year to all residents within the development

- **PARKING PERMIT FREE PROVISIONS**: all occupiers of the dwelling units, unless they are the holder of a disabled persons badge issued pursuant to Section 21 of the Chronically Sick and Disabled Persons Act 1970, shall be ineligible to be granted a permit to park a vehicle in a residents’ parking bay located in the vicinity of the application site

- **IMPROVEMENTS TO RAILWAY ARCHES**: £50k towards improvements to the lighting and improvement of the railway arch between the middle and rear site

- **Public Realm Provisions**: the s.106 agreement would ensure the provision of the public realm landscaping works across the site by requiring the applicant/developer to: 1) devise and submit for the council’s approval a detailed scheme for the laying out of the public realm of the whole site; 2) enter into all necessary agreements and to obtain all necessary consents prior to implementation; and 3) thereafter deliver the works in accordance with a schedule that has first been agreed in writing by the local planning authority.

- **Energy and Sustainability Scheme**: the submission of such for the council’s approval

- **Mitigation Measures Relating to Television Reception**: requirements to monitor and thereafter use reasonable endeavours to reinstate satisfactory radio, satellite, terrestrial television or other telecommunications services reception to residential properties as may be affected by the development

- **Monitoring Fee: £30k** to be used only by the Council for monitoring the observance and performance of the obligations in the deed and upon the administration of the provisions of the deed
8.0 CONCLUSION:

8.1 The development is a departure from current development plan policy in that it would introduce residential uses into a Key Industrial and Business Area (the middle and rear sites) safeguarded for employment uses. However, the scheme is predicated on maximizing the employment space offer, in accordance with the KIBA designation. Housing has been introduced to improve the financial viability of the scheme and to make such a significant employment offer (8,126sqm GIA) viable and sustainable.

8.2 In addition, the development is in conflict with the development plan policy in that it would result in harm to the special interest and setting of heritage assets. The proposed alterations and extensions to 8 Albert Embankment and the introduction of building D would all contribute to a harmful impact upon the special architectural and historic interest and setting of the Grade II Listed 8 Albert Embankment. In addition, given the positive contribution that this building makes to the existing townscape and the harmful impacts of the development as it would be viewed within the townscape context, the development would also prove harmful to the character and appearance of the Albert Embankment Conservation Area. Furthermore, to the rear building G would be noticeably higher than its immediate neighbours and, as a result, may be regarded as being an overly dominant addition to the street scene and the conservation area in this location. Officers consider that the cumulative harm to heritage assets is not however substantial.

8.3 The Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise. In addition, PPS5 requires that where harm identified is less than substantial, then there is a need to (i) weigh the public benefit of the proposal (for example, that it helps to secure the optimum viable use of the heritage asset in the interests of its long-term conservation) against the harm; and (ii) recognise that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss.

8.4 In the first instance it should be noted that the Central Activities Zone, the OAPF and Core Strategy Policy PN2 are all facilitating of mixed use developments inclusive of residential uses within the Albert Embankment area and to the east of the railway embankment.

8.5 In the second instance, the scheme as is currently presented would secure a negative RLV, so the developer would be taking a risk on the viability of the scheme improving if they are to implement at this time. In this context a KIBA compliant development for the middle and rear sites would unlikely come forward in the current economic climate.

8.6 It is also the case that the development would ensure the continued historic use of the building by the fire brigade, which is a substantial heritage benefit of the development. The refurbished fire station (self funded through the private residential component of the development) would also allow for the brigade to more adeptly serve the area within which the site is located (inclusive of the
nationally important Westminster World Heritage Site) and the quantum of development expected to come forward through the OAPF. This constitutes a local community and national benefit of significant weight.

8.7 In addition, the jobs generated by the development are a material planning consideration that weigh substantially in favour of approving the scheme; as would the significant contribution towards the council’s Vauxhall and borough wide housing targets. In these regards the scheme would bring lasting wider social benefits, contribute to economic growth in this part of Lambeth and contribute to a mix of uses and activity of benefit to the immediate locality and the wider area. The development would also provide regeneration benefits to the area, inclusive of the removal of the 1970s control centre and the re-animation of Lambeth High Street together with a modern development of the rear site which currently consists of a tarmac hard standing and contributes little to the vicinity.

8.8 Given the policy context specific to the OAPF and the strong presumption set out for mixed use development inclusive of residential uses, and having regard to the substantial community and planning benefits that the development would deliver, officers consider that sufficient justification exists to enable the positive determination of the application.

8.9 In all other regards, the development is considered compliant with current development plan policy.

8.10 The development maximises the quantum of employment floorspace within high quality modern adaptable units for small and medium enterprises; for which there is a recognised need within the borough. The mix, tenure split/distribution and quality of the residential accommodation to be provided is considered appropriate, in light of Lambeth’s housing needs and demands and given the development constraints of the site. Setting aside the heritage issues outlined above, the development is considered of a sufficiently high quality of design and appearance that would not harm any identified strategic views, local townscape views or other heritage assets. Furthermore, subject to conditions and the s106 agreement the development would not impact unacceptably upon the function and safety of the highway network (both pedestrian and vehicular), parking stress in the vicinity and public transport capacity.

8.11 In addition, the package of conditions and s106 obligations would ensure that: the development would achieve suitable commitment to reducing carbon emissions, sustainable design and construction and the use of renewable energy technologies; the development would not unduly promote opportunities for crime; that land contamination and flood risk need not prove a barrier to the development; that the bio-diversity of the site and surrounds would be appropriately protected/enhanced; that adequate refuse storage provision would be provided at the site; and that the development would not unacceptably impact upon local infrastructure.

8.12 Officers consider that the development would not unacceptably harm the amenity of neighbouring residents. In this regard it is advised that the daylight and sunlight impacts of the development have been independently verified by GL
Hearn, who express an opinion that the impact of the proposed development upon surrounding residential properties is on the whole acceptable given the urban location of the site. Officers accept GL Hearn’s advice, having regard also to the nature of development envisaged to come forward in this part of the opportunity area and to the other planning benefits that would be derived from the scheme were it implemented.

8.13 On balance therefore, officers are recommending approval of the development.

9.0 Recommendation

1. Resolve to approve planning permission, subject to the conditions set out below and to the s106 obligations set out at section 7.14 of this report - for referral to the Mayor.

2. Resolve to approve the associated Listed Building Consent and Conservation Area Consent, subject to the conditions set out below and subject to the referral of the planning application to the Mayor.

10.0 Procedural Matters

10.1 Under the arrangements set out in the Town and Country Planning (Mayor of London) Order 2008, the planning application is referable to the Mayor. The application has already been referred to the Mayor under Article 4 of the Order. The Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the planning 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.

Summary of Reasons:

In deciding to grant planning permission, Listed Building Consent and Conservation Area Consent, the Council has had regard to the relevant policies of the Development Plan and all other relevant material considerations. Having weighed the merits of the proposal in the context of these issues, it is considered that planning permission, Listed Building Consent and Conservation Area Consent should be granted subject to the conditions listed below and subject to a s.106 planning agreement. In reaching this decision the following development plan policies were relevant:

London Plan:
Policies 1.1 (Delivering the strategic vision and objectives for London); 2.9 (Inner London); 2.10 (Central Activities Zone – strategic priorities); 2.11 (Central Activities Zone – strategic functions); 2.12 (Central Activities Zone – predominantly local activities); 2.13 (Opportunity areas and intensification areas); 3.1 (Ensuring equal life chances for all); 3.2 (Improving health and addressing health inequalities); 3.3 (Increasing housing supply); 3.4 (Optimising housing potential); 3.5 (Quality and design of housing developments); 3.6 (Children and young people’s play and informal recreation facilities); 3.7 (Large
residential developments); 3.8 (Housing choice); 3.9 (Mixed and balanced communities); 3.10 (Definition of affordable housing); 3.11 (Affordable housing targets); 3.12 (Negotiating affordable housing on individual private residential and mixed use schemes); 3.16 (Protection and enhancement of social infrastructure); 3.17 (Health and social care facilities); 3.18 (Education facilities); 3.19 (Sports facilities); 4.1 (Developing London’s economy); 4.2 (Offices); 4.3 (Mixed use development and offices); 4.5 (London’s visitor infrastructure); 4.6 (Support for and enhancement of arts, culture, sport and entertainment provision); 4.7 (Retail and town centre development); 4.8 (Supporting a successful and diverse retail sector); 4.10 (New and emerging economic sectors); 4.11 (Encouraging a connected economy); 4.12 (Improving opportunities for all); 5.1 (Climate change mitigation); 5.2 (Minimising carbon dioxide emissions); 5.3 (Sustainable design and construction); 5.5 (Decentralised energy networks); 5.6 9Decentralised energy in development proposals); 5.7 (Renewable energy); 5.8 (Innovative energy technologies); 5.9 (Overheating and cooling); 5.10 (Urban greening); 5.11 (Green roofs and development site environs); 5.12 (Flood risk management); 5.13 (Sustainable drainage); 5.14 (Water quality and wastewater infrastructure); 5.15 (Water use and supplies); 5.16 (Waste self-sufficiency); 5.21 (Contaminated land); 6.1 (Strategic approach); 6.2 (Providing public transport capacity and safeguarding land for transport); 6.3 (Assessing effects of development on transport capacity); 6.4 (Enhancing London’s transport connectivity); 6.5 (Funding Crossrail and other strategically important transport infrastructure); 6.7 (Better streets and surface transport); 6.9 (Cycling); 6.10 (Walking); 6.11 (Smoothing traffic flow and tackling congestion); 6.12 (Road network capacity); 6.13 (Parking); 7.1 (Building London’s neighbourhoods and communities); 7.2 (An inclusive environment); 7.3 (Designing out crime); 7.4 (Local character); 7.5 (Public realm); 7.6 (Architecture); 7.7 (Location and design of tall and large buildings); 7.8 (Heritage assets and archaeology); 7.10 (World Heritage Sites); 7.11 (London View Management Framework); 7.12 (Implementing the London View Management Framework); 7.13 (Safety, security and resilience to emergency); 7.14 (Improving air quality); 7.15 (Reducing noise and enhancing soundscapes); 7.18 (Protecting local open space and addressing local deficiency); 7.19 (Biodiversity and access to nature); 7.29 (The River Thames); and 8.2 (Planning obligations).

Lambeth’s Local Development Framework Core Strategy:
Policies S1 (Delivering the Vision and Objectives); S2 (Housing); S3 (Economic Development); S4 (Transport); S5 (Open Space); S6 (Flood Risk); S7 (Sustainable Design and Construction); S8 (Sustainable Waste Management); S9 (Quality of the Built Environment); S10 (Planning Obligations); and PN2 (Vauxhall).

Policies of the adopted Unitary Development Plan (2007), saved beyond 05 August 2010 and not superseded by the adoption of the Core Strategy:
Policies 7 (Protection of Residential Amenity); 9 (Transport Impact); 14 (Parking and Traffic Restraint); 15 (Additional Housing); 16 (Affordable Housing); 19 (Active Frontage Uses); Policy 23 (Protection and Location of Other Employment Uses); 26 (Community Facilities); 29 (The Evening and Late Night Economy, Food and Drink and Amusement Centre Uses); 30 (Arts and Culture); 31 (Streets, Character and Layout); 32 (Community Safety/Designing Out Crime); 33 (Building Scale and Design); 35 (Sustainable Design and Construction); 36 (Extensions and Alterations); 37 (Shopfronts and Advertisements); 39 (Streetscape, Landscape and Public Realm Design); 40 (Tall Buildings); 41 (Views); 43 (The River Thames Policy Area – Urban Design); 45 (Listed
Planning Application 10/04473/FUL:

Conditions

1 The development to which this permission relates must be begun not later than the expiration of three years beginning from the date of this decision notice.

Reason: To comply with the provisions of Section 91(1) (a) of the Town and Country Planning Act 1990 and Section 51 of the Planning and Compulsory Purchase Act 2004.

2 Before any development commences, full details of the proposed construction methodology, in the form of a Method of Construction Statement, shall be submitted to and approved in writing by the Local Planning Authority. The Method of Construction Statement shall include details and arrangements regarding: the notification of neighbours with regard to specific works; advance notification of road closures; details regarding parking, deliveries and storage (including details of the routing of delivery vehicles to and from the site and the accommodation of all site operatives’, visitors’ and construction vehicles loading, off-loading, parking and turning within the site during the construction period); details regarding dust mitigation; details of measures to prevent the deposit of mud and debris on the public highway; and other measures to mitigate the impact of construction on the amenity of the area. The details of the approved Method of Construction Statement must be implemented and complied with for the duration of the demolition and construction process.

Reason: To ensure minimal nuisance or disturbance is caused to the detriment of the amenities of adjoining occupiers and of the area generally, and avoid hazard and obstruction to the public highway. (Policies 7, 9, 31, and 48 of the Adopted Unitary Development Plan (2007) refer.).

3 Notwithstanding the details shown on the approved plans, prior to the commencement of building works above ground a full design specification of the shopfronts to the active frontage units of the scheme and of all facades which present to the public realm shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be constructed in accordance with the details approved, unless otherwise agreed in writing with the Local Planning authority.

Reason: To ensure an adequate quality of detailed design so as to safeguard and enhance the visual amenities of the locality (Policies 33, 37 40 and 43 of Lambeth’s Unitary Development Plan and Policies S9 and PN2 of Lambeth’s Core Strategy).

4 Notwithstanding the approved drawings and prior to the commencement of any building works above ground, samples and a schedule of all materials to be used in the elevations, balconies, roofing and joinery of the development hereby permitted shall be
submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out solely in accordance with the approved details. In particular the following details must be submitted:

a) Windows
b) Winter Gardens
c) Balconies
d) Terraces
e) Canopies
f) Joinery
g) Decorative Brickwork
h) Gates
i) Ground Floor Entrances
j) External Cycle Storage

Reason: To ensure an adequate quality of detailed design so as to safeguard and enhance the visual amenities of the locality (Policies 33, 37, 41, 43, 45 and 47 of Lambeth’s Unitary Development Plan and Policies S2, S9 and PN2 of Lambeth’s Core Strategy).

5 No development works above ground shall commence until full details of the public realm provisions of the development have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall include the detailed design of the landscaping of the public realm, a strategy to maximise inclusivity, planting specifications, details of street furniture, details of signage (inclusive of a way finding strategy), details of how the provisions will facilitate the predicted movement patterns through the development, a materials palette for the ‘hard’ elements of the landscaping, design features included to mitigate the potentially hostile environment (particularly wind), best endeavours to enhance the ecological value of the site, and a robust management strategy for the continued and ongoing maintenance of the space. The public realm provisions shall thereafter be provided and retained/maintained in accordance with the approved details and maintenance strategy for the duration of the permitted development, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the proposed landscaping and public realm areas are of a high quality and for consistent treatment of the public realm (Policies 33 and 39 of Lambeth’s Unitary Development Plan and Policies S9 and PN2 of Lambeth’s Core strategy).

6 There shall be no occupation of the development (other than the fire station) prior to the substantial completion of the proposed highways and public realm works to Lambeth High Street.

Reason: In order to minimise danger, obstruction and inconvenience to users of the highway and of the development (Policies 9 and 14 of Lambeth’s Unitary Development Plan and Policies S4 and PN2 of Lambeth’s Core Strategy).

7 Prior to the commencement of building works above ground, full details of the layout, landscaping (hard and soft), furniture and on-going maintenance of the external communal amenity spaces of the development (the roof gardens of buildings B, C and G
and the podiums) shall be submitted to and approved in writing by the Local Planning Authority. The external communal amenity spaces shall be inclusive of at least 230sqm of playspace for children between 0 and 5 years old. The external communal amenity spaces of the relevant part of the application site (i.e. the front site and the middle site) shall thereafter be provided in accordance with the approved details prior to the residential occupation of the relevant part of the application site and retained thereafter for the duration of the development.

Reason: To ensure the provision of a sufficiently high quality external communal amenity space for the development to benefit the residential occupants of the development and to lessen the impact of the development upon local amenity spaces that would otherwise occur (Policies 33 and 39 of Lambeth’s Unitary Development Plan and Policies S2, S9 and PN2 of Lambeth’s Core Strategy).

8 Notwithstanding the details shown on the approved drawings, building E(N) shall be provided with a first floor direct access to the communal amenity space located upon the central podium of the middle site, for use by all residents of building E(N), and in accordance with details that have prior to the commencement of development works upon the middle site been submitted to an approved in writing by the local planning authority.

Reason: To ensure inclusivity and suitable access to the central amenity space for the residents of building E(N) and to lessen the impact of the development upon local amenity spaces that would otherwise potentially occur (Policies 33 and 39 of Lambeth’s Unitary Development Plan and Policies S2, S9 and PN2 of Lambeth’s Core Strategy).

9 Prior to development works above ground, full details of the internal communal amenity spaces of the development (the club room and the retained board room at levels 1 and 2 respectively of building A and the communal terraces of buildings D and F) shall be submitted to and approved in writing by the local planning authority. The submissions shall be inclusive of the envisaged usage of the areas, the fit out of the rooms, the means of terms of access to the areas, landscaping and the proposed arrangements for the ongoing maintenance and up-keep of the areas. The internal communal amenity spaces of the relevant part of the application site (i.e. the front site and the middle site) shall thereafter be provided in accordance with the approved details prior to the residential occupation of the relevant part of the application site and retained thereafter for the duration of the development.

Reason: To ensure the provision of a sufficiently high quality external communal amenity space for the development to benefit the residential occupants of the development and to lessen the impact of the development upon local amenity spaces that would otherwise occur (Policies 33 and 39 of Lambeth’s Unitary Development Plan and Policies S2, S9 and PN2 of Lambeth’s Core Strategy).

10 The development shall be constructed and operated thereafter to ‘Secured by Design Standards’. A certificate of accreditation to Secured by Design Standards shall be submitted to the local planning authority for approval in writing prior to the residential occupation of the relevant part of the application site (the front site, the middle site or the rear site).
Reason: To ensure that satisfactory attention is given to security and community safety (Policy 32 of Lambeth’s Unitary Development Plan and Policy S9 of Lambeth’s Core Strategy).

11 Prior to the commencement of building works above ground, full details of a lighting strategy, including details of the lighting of all communal and public areas in and around buildings shall be submitted to and approved in writing by the local planning authority. The approved lighting shall be installed before the commencement of use (other than the fire station) and shall be maintained thereafter for the duration of the development in accordance with the approved details, unless an alternative implementation schedule is agreed in writing with the Local Planning Authority.

Reason: To ensure that satisfactory attention is given detailed design, to security and community safety and to providing acceptable living environments for future residents of the development (Policy 7, 32 and 33 of Lambeth’s Unitary Development Plan and Policies S2, S9 and PN2 of Lambeth’s Core Strategy).

12 Notwithstanding the provisions of Article 3 and Class A of Part 2 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking or re-enacting that Order), no gates, fences, walls or other means of enclosure, other than those that may be approved pursuant to other conditions of this consent, shall be erected within the application site without the prior written approval of the Local Planning Authority.

Reason: To ensure that the Local Planning Authority may be satisfied that the details of the proposal (Policies 9, 33 and 39 of Lambeth’s Unitary Development Plan and Policy S9 and PN2 of Lambeth’s Core Strategy).

13 No plumbing or pipes, other than rainwater pipes, shall be fixed to the external faces of buildings.

Reason: To ensure an appropriate standard of design (Policy 33 Lambeth’s Unitary Development Plan and Policy S9 and PN2 of Lambeth’s Core Strategy).

14 Unless the listed building constraints of building A dictate otherwise, the residential units of the development shall be designed and constructed to meet the following standards:

a) for living rooms, 35 dB(A) LAeq 16 hour between 07:00 and 23:00 hrs;

b) for bedrooms, 30 dB(A) LAeq 8 hour between 23:00 and 07:00 hrs; and

c) 45 dB(A) max for any individual noise event (measured with F time weighting) between 23.00 and 07.00hrs

Verification of the achievement of the prescribed standards shall be submitted to and approved in writing by the local planning authority prior to the residential occupation of the relevant parts of the application site (the front site, the middle site and the rear site).
Reason: To ensure that no nuisance or disturbance is caused to the detriment of the amenities of future occupiers (Policy S2 of Lambeth’s Core Strategy).

15 There shall be no amplified sound, speech or music system used in association with any of the ground floor commercial premises fixed, used, or audible outside any of those ground floor commercial premises.

Reason: To safeguard the amenities of future residential occupiers and the surrounding area (Policies 7 and 29 of Lambeth’s Unitary Development Plan and Policy S2 of Lambeth’s Core Strategy).

16 Prior to the commencement of building works above ground, full details of internal and external plant equipment and trunking (including building services plant, ventilation and filtration equipment) and commercial kitchen exhaust ducting / ventilation, shall be submitted to and approved in writing by the Local Planning Authority. All flues, ducting and other equipment shall be installed in accordance with the approved details prior to the relevant use commencing on site and shall be retained for the duration of the use, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that no nuisance or disturbance is caused to the detriment of the amenities of future residential occupiers or of the area generally (Policy 7 and 29 of Lambeth’s Unitary Development Plan and Policy S2 and PN2 of Lambeth’s Core Strategy).

17 Noise from any mechanical equipment or building services plant shall not exceed the background noise level when measured outside the window of the nearest noise sensitive or residential premises, when measured as a L90 dB(A) 1 hour.

Reason: To protect the amenities of future residential occupiers and the surrounding area (Policies 7 and 29 of Lambeth’s Unitary Development Plan and Policy S2 of Lambeth’s Core strategy).

18 No process shall be carried out or machinery installed at the development which could not be installed in a residential area without detriment to the amenity of the area because of noise, vibration, smell, fumes, smoke soot, ash, dust or grit.

Reason: To protect the amenities of future residential occupiers and the surrounding area (Policies 7 and 29 of Lambeth's Unitary Development Plan and Policy S2 of Lambeth’s Core strategy).

19 The hours of operation of the active frontage uses (Use Classes A1 to A4) hereby permitted shall be submitted to and agreed in writing by the Local Planning Authority prior to first occupation of the relevant premises and shall not operate other than in accordance with the agreed hours unless agreed in writing by the Local Planning Authority.

Reason: To protect the amenities of future residential occupiers and the surrounding area (Policies 7 and 29 of Lambeth’s Unitary Development Plan and Policy S2 of Lambeth’s Core Strategy).
20 All residential flats hereby permitted shall comply with the relevant Lifetime Homes standards.

Reason: To secure appropriate access for disabled people, in accordance with Policy S2 of Lambeth’s Core Strategy.

21 At least 10% of the residential flats hereby permitted shall be designed so that they can be easily adaptable to meet the Wheelchair Housing standard.

Reason: To secure appropriate access for disabled people, in accordance with Policy S2 of Lambeth’s Core Strategy.

22 The development shall be constructed to meet at least code level 3 for the Code for Sustainable Homes and at least BREEAM ‘Very Good’ for all other elements of the scheme. Prior to the commencement of building works, a full BREEAM pre-assessment for all non-residential elements, and a Code for Sustainable Homes pre-assessment for the development shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the prescribed performance levels. No later than 6 months from the substantial completion of the development verification that the development has achieved the relevant targets shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure sustainable design and construction (Policy 35 of Lambeth’s Unitary Development Plan and Policies S7 and PN2 of Lambeth’s Core Strategy).

23 No demolition works shall take place within the site other than in full accordance with a programme of archaeological work (inclusive of a written scheme of investigation) which has first been submitted to and approved in writing by the Local Planning Authority.

Reason: To prevent the grubbing out of foundations and other obstructions that may result in impact upon the potential archaeological resource (Policy S9 of Lambeth’s Core Strategy).

24 No development shall take place other than in full accordance with a programme of archaeological work (including a written scheme for investigation and in accordance with appropriate English Heritage guidelines) which has first been submitted to and approved in writing by the Local Planning Authority. The archaeological works shall be carried out by a suitably qualified investigating body acceptable to the Local Planning Authority.

Reason: To minimise the potential damage to archaeological remains (Policy S9 of Lambeth’s Core Strategy).

25 No development shall commence on site until a detailed design and method statement for the foundation design and all new ground works has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that any archaeological remains on this site are preserved in situ (Policy S9 of Lambeth’s Core Strategy).
26. No impact piling shall take place until a piling method statement (detailing the type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for harm/damage to ground water, subsurface water or sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground water and sewerage utility infrastructure and piling has the potential to impact upon local underground water and sewerage utility infrastructure (Policies S6 and PN2 of Lambeth’s Core Strategy).

27. Development shall not commence until a drainage strategy (detailing any on and/or off site drainage works) has been submitted to and approved in writing by the local planning authority. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed.

Reason: The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community (Policies S6 and PN2 of Lambeth’s Core Strategy).

28. Development shall not begin on site until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development and inclusive of details of how the scheme shall be maintained and managed after completion, has been submitted to and approved in writing by the local planning authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is substantially completed.

Reason: To ensure groundwater is protected, to minimise risk of flooding, to improve and protect water quality, to improve habitat and amenity, and to ensure future maintenance of the surface water drainage system (Policies S6 and PN2 of Lambeth’s Core Strategy).

29. No development shall commence on site until the following components of a scheme to deal with the risks associated with contamination of the site have been submitted to and approved in writing by the local planning authority:

1. A site investigation scheme, based on previous findings to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site;
2. The site investigation results and the detailed risk assessment (1);
3. An options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for...
The development shall thereafter be implemented in accordance with the details and measures approved.

Reason: To ensure appropriate consideration and remediation of risks associated with contamination of the site (Policies S6 and PN2 of Lambeth’s Core Strategy).

30 Prior to occupation of any part of the permitted development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a “long-term monitoring and maintenance plan”) for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the local planning authority.

Reason: Depending on the outcome of any ground investigation and subsequent risk assessment, it may be necessary for remediation to be carried out. If this is the case, it will be necessary to demonstrate that any work has been carried out effectively and the environmental risks have been satisfactorily managed (Policies S6 and PN2 of Lambeth’s Core Strategy).

31 If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, an amendment to the remediation strategy detailing how this unsuspected contamination shall be dealt with.

Reason: The site is underlain by a Secondary aquifer and groundwater quality needs to be protected. Any visibly contaminated or odorous material encountered on the site during the development work, must be investigated (Policies S6 and PN2 of Lambeth’s Core Strategy).

32 Prior to the commencement of use of the development (other than the fire station use of the front site), a Waste Management Plan for the whole development shall be submitted to and approved in writing by the Local Planning Authority. The waste management plan shall thereafter be implemented in accordance with the approved details for the duration of the development, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure that adequate provision is made for the storage of refuse and the provision of recycling facilities on the site and in the interests of the amenities of the area. (Policies 9 and 33 of Lambeth’s Unitary Development Plan and Policies S8 and S9 of Lambeth’s Core Strategy).

33 Prior to the occupation of more than 50% of the residential units hereby permitted, the active frontage/A Class units and the B1 office space shall be completed and
available for occupation in accordance with the plans hereby approved, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure the satisfactory provision of employment/commercial floorspace on the site (Policy PN2 of Lambeth’s Core Strategy).

34 The ground floor active frontage units of buildings B and D shall only be occupied by uses falling within Use Classes A1, A2, A3 or A4 of the Town and Country Planning (Use Classes) Order 1987 (as amended) and shall not be used for a dual or mixed use of those uses. Following initial commencement of any of those units, this planning permission shall not thereafter confer any further rights of change of use to those individual units other than those that are conferred by the Use Classes Order 1987 (as amended) and Schedule 2, Part 3, Class D of the Town and Country Planning (General Permitted Development) Order 1995 (as amended).

Reason: To ensure that the resultant use of the property is appropriate to the vitality, viability and function of the shopping centre and to ensure that any future change of use as would otherwise be permitted would not act to undermine that vitality, viability and functionality (Policy S3 and PN4 of the Lambeth’s Core Strategy).

35 No part of the building hereby permitted shall be occupied or used until the provision for cycle parking shown on the application drawings has been implemented in full and the cycle parking shall thereafter be retained solely for its designated use.

Reason: To ensure adequate cycle parking is available on site and to promote sustainable modes of transport. (Policies 9 and 14 of Lambeth’s Unitary Development Plan and Policy S4 of Lambeth’s Core Strategy).

36 The scheme for parking, garaging, manoeuvring, and the loading and unloading of vehicles shown on the submitted plans shall be laid out in accordance with the approved details prior to the initial residential occupation of the development hereby permitted and that area shall not thereafter be used for any other purpose, or obstructed in any way.

Reason: To enable vehicles to draw off, park and turn clear of the highway to minimise danger, obstruction and inconvenience to users of the adjoining highway (Policies 9 and 14 of Lambeth’s Unitary Development Plan and Policy S4 of Lambeth’s Core Strategy).

37 No more than 69 of the parking spaces shown on the approved drawings shall be provided for use by residents of and visitors to the residential element of the development.

Reason: To minimise the levels of parking provision on the site in connection with the residential element of the development, so as to minimise the impacts of the development upon the function and safety of the highway network and so as to promote more sustainable modes of transport in such a sustainable location (Policies 9 and 14 of Lambeth’s Unitary Development Plan and Policies S1, S4 and PN2 of Lambeth’s Core Strategy).

38 Prior to the initial residential occupation of the development, a Parking Management Plan shall be submitted to and approved in writing by the local planning
authority. The plan shall be inclusive of details of parking space allocation, details of access and details of how parking outside of the designated spaces will be prevented and policed. The Parking Management Plan shall thereafter be implemented for the duration of the development, unless the written consent of the local planning authority is received for any variation.

Reason: To ensure proper management of the parking areas (Policies 9 and 14 of Lambeth’s Unitary Development Plan and Policy S4 of Lambeth’s Core Strategy).

39 No part of the building hereby permitted shall be occupied or used until a strategy for the management of deliveries and servicing has been submitted to and approved in writing by the Local Planning Authority. Deliveries and servicing shall thereafter be carried out solely in accordance with the approved details.

Reason: To avoid hazard and obstruction being caused to users of the public highway and to residential amenity (Policies 9 and 33 of Lambeth’s Unitary Development Plan and Policies S2 and S4 of Lambeth’s Core Strategy).

40 No part of the development shall be occupied until an area has been laid out within the site for vehicles to turn in accordance with the approved drawing/details to be submitted to and approved in writing by the Local Planning Authority prior to the commencement of development, and that area shall not thereafter be used for any other purpose or obstructed in any way.

Reason: To enable vehicles to draw off and turn clear of the highway thereby avoiding the need to reverse onto the public highway (Policies 9 and 14 of Lambeth’s Unitary Development Plan and Policy S4 of Lambeth’s Core Strategy).

41 Prior to the residential occupation of the relevant part of the development (the front site, the middle site and the rear site) all other existing access points not incorporated in the development hereby permitted shall be stopped up by raising the existing dropped kerb/removing the existing bellmouth/and reinstating the footway verge and highway boundary to the same line, level and detail as the adjoining footway verge and highway boundary.

Reason: To limit the number of access points along the site boundary for the safety and convenience of the highway users (Policies 9 and 33 of Lambeth’s Unitary Development Plan and Policies S4 and S9 of Lambeth’s Core Strategy).

42 No residential development of the front site shall occur until such time as the improvements to the operational fire station, as set out in the planning submissions, have been completed in their entirety.

Reason: The alterations and extensions to the grade II listed building are only justified, in part, by the provision of a modernised fire station within the building (Unitary Development Plan Policies 45 and 47 and Core strategy Policy S9).

43 No residential occupation of the middle site shall occur until such time as the development of the rear site has been commenced. No more than 50% of the residential
units of the middle site shall be occupied until the residential units of the rear site have been made ready for occupation.

Reason: To ensure the delivery of the social rented affordable housing element of the development (Core strategy Policies S2 and PN2).

44 The obelisk currently located on the front site shall, unless proved impracticable, be retained and relocated within the site as part of either the public realm or communal amenity space provisions. Full details of the new location, the method of relocation (including storage and protection during the construction period), the new fixings and any remedial works required, shall be submitted to the local planning authority prior to the commencement of any building works on site.

Reason: To ensure suitable retention and protection of the obelisk, which is of intrinsic heritage value (Unitary Development Plan Policies 45 and 47 and Core strategy Policy S9).

45 The development hereby permitted shall be carried out in accordance with the approved plans listed in this decision notice, other than where those details may be superseded by details as may be approved pursuant to the requirements of the listed planning conditions.

Reason: To ensure that the development is implemented in accordance with the approved planning consent.

Informatives

1 This decision letter does not convey an approval or consent which may be required under any enactment, by-law, order or regulation, other than Section 57 of the Town and Country Planning Act 1990.

2 Your attention is drawn to the provisions of the Building Regulations, and related legislation which must be complied with to the satisfaction of the Council's Building Control Officer.

3 Street Naming & Numbering

As soon as building work starts on the approved development, you must contact the Street Naming and Numbering Officer if you need to do any of the following:

- name a new street
- name a new or existing building
- apply new street numbers to a new or existing building
- apply new numbers to internal flats or units

This will ensure that any changes are agreed with Lambeth Council before use, in accordance with the London Buildings Acts (Amendment) Act 1939 and the Local Government Act 1985. Contact details for the Street Naming and Numbering Officer are listed below:
4 With regards to the condition requirements pertaining to foundation design, the detailed proposals should include appropriate drawings, notes and method statements showing how the objectives of in situ preservation is to be achieved. Particular attention should be paid to the design of foundations and new ground works including any piling, underpinning, new slab levels, slab construction, lift shafts or new service trenches. You are advised to contact the relevant Planning Department case officer and English Heritage's Archaeological Adviser on 0171 973 3737 to discuss the submission of details required to discharge this condition. You are also advised to contact the Divisional director (Building Control) to ensure that all Building Control regulations are met.

5 With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that you should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777.

6 Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Groundwater permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 8507 4890 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

7 The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the details of the piling method statement.

8 It is advised that Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

9 Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.
10 Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Further information on the above is available in a leaflet, ‘Best Management Practices for Catering Establishments’ which can be requested by telephoning 020 8507 4321.

11 Contaminated soil that is excavated, recovered or disposed of, is controlled waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

i.) Duty of Care Regulations 1991
ii.) Hazardous Waste (England and Wales) Regulations 2005
iii.) Environmental Permitting (England and Wales) Regulations (2010)

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed off site operations is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

Listed Building Consent Application 10/04475/LB:
Refurbishment, partial demolition, extensions and alterations to fire station and drill tower including: demolition of modern rear extension, erection of a rear extension at fourth to ninth levels and single storey roof extension. External cleaning and repair, creation of ground floor entrance on south flank, alterations and extension to basement, works associated with connection of covered wash down area to rear of building connecting at first floor level. Internal alterations to provide residential accommodation on first to tenth floors, and fire station and ancillary facilities at basement and ground floors. Refurbishment and internal alterations to the drill tower, and works associated with connection of a building on east flank of the listed building at ground floor level and connection of a single storey building on the north flank of the listed building.

Conditions

1. Written notification of the start of works on site shall be sent to English Heritage, London Region, 23 Savile Row, London, W1S 2ET and a copy sent to the local planning authority at least seven days before the works hereby approved are commenced.

Reason: To enable the relevant bodies to properly monitor the implementation of the works and ensure that all necessary pre-commencement requirements have been fulfilled in order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

2. The works hereby permitted shall be begun before the expiration of three years from the date of this consent.
Reason: To comply with the requirements of Section 18(1)(a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

3. No works authorised by this consent shall take place until the applicant has implemented a programme of building recording and analysis by a person or body approved by the local planning authority. This programme shall be in accordance with a written scheme which has been submitted by the applicant and approved by local planning authority. Particular attention should be paid to the recording of the command and control centre, the workshops, the railings enclosing the rooftop flagpole, the viewing platform steps and handrails on the first and second floor balconies and the basement command and control centre.

Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

4. The works of demolition or alteration by way of partial demolition hereby approved at the front site shall not be commenced before contract(s) for the carrying out of the completion of the works on the front site for which consent is hereby granted, including the works contract, have been made and evidence of such contract(s) has been submitted to and accepted in writing by the local planning authority.

Reason: To ensure that premature demolition does not take place (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

5. Before any work is undertaken in pursuance of this consent to demolish or to alter by way of partial demolition any part of the building, structural engineers' drawings and/or a method statement, indicating the proposed method of ensuring the safety and stability of the building fabric to be retained throughout the period of demolition and reconstruction, shall be submitted to and approved by the local planning authority. The relevant work shall be carried out in accordance with such structural engineers' drawings and/or method statement thus approved.

Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

6. Precautions shall be taken to secure and protect the interior features of intrinsic interest against accidental loss or damage, or theft during the building work. Details shall be submitted to and approved by the local planning authority before works begin on site, and the relevant work carried out in accordance with such approval. No such features shall be disturbed or removed temporarily or permanently except as indicated on the approved drawings or with prior approval in writing by the local planning authority.

Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

7. All new external and internal works and finishes and works of making good to the retained fabric, shall match the existing adjacent work with regard to the methods used and to material, colour, texture and profile, unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent.
8. Sample panels of all new facing brickwork showing the proposed brick types, colour, texture, face bond and pointing shall be provided on site and the specification approved in writing by the local planning authority before the relevant parts of the works are begun. The relevant parts of the work shall be carried out in accordance with such approved sample panels. The approved sample panels shall be retained on site until the work is completed and has been approved.

Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

9. Details in respect of the following shall be submitted to and approved in writing by the local planning authority (in consultation with English Heritage) before the relevant work is begun. The relevant work shall be carried out in accordance with such approved details of:

- Lintels;
- Copings;
- Cills;
- Flashings; and
- Internal alterations to window and door reveals.

Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

10. The fireman pole in room C1 (proposed ground floor plan) and the staircase (centre rear – proposed room A4) in the appliance room shall be retained in-situ unless otherwise approved in writing by the local planning authority.

Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

11. Any replacement windows in the original building shall be steel and replicate the surviving windows in every respect. Prior to the commencement of any building works on site, detailed drawings at 1:20 scale, 1:5 and 1:1 scale (as applicable) of all new external windows and doors (including the new pole shaft extension), as well as a schedule for the refurbishment and thermal upgrade of the external windows and doors, shall be submitted to and approved in writing by the local planning authority. The development shall thereafter only be completed in accordance with the approved details.

Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

12. Prior to the commencement of development works on site, details of the new location of the flagpole, its fixings and any remedial works required shall be submitted to and approved in writing by the local planning authority. The relocation of the flagpole shall thereafter be undertaken in accordance with the approved details.

Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).
Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

13. No development works shall commence on site until the following information has been submitted and approved in writing by the local planning authority:

i. Details of how the retained poles and pole shafts (including their doors) shall be retained and incorporated;
ii. Full details of the glazing screen in the main foyer;
iii. Details on the provisions made to adequately ventilate the ground floor internal refuse stores;
iv. A schedule outlining the dismantling and re-erection of the memorial sculpture to removed;
v. Before and after internal elevations (including ceilings) at 1:20 scale annotated with details of materials, fixtures and fittings etc, finishes and a schedule of works to existing fabric for the following:
   - proposed room C3;
   - north residential entrance;
   - south residential entrance;
   - appliance bays;
   - recreation room (first floor); and
   - control and command room (second floor).

The development works shall not thereafter be undertaken other than in accordance with approved details.

Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

14. No development works shall commence on site until specifications and details of all works to the listed building proposed in order to meet the requirements of the building regulations have been submitted to and approved in writing by the local planning authority. Such details shall be inclusive of full details of routes of waste water and soil pipes, cables, and other services. No new plumbing, pipes, soil stacks, flues, vents or ductwork shall be fixed on the external faces of the building unless shown on the drawings hereby approved or otherwise agreed in writing by the local planning authority.

Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

15. Prior to the commencement of development on site, full details of any roof top plant (including photovoltaics etc), including information on their visibility in views across the river and proposed screening, shall be submitted to and approved in writing by the local planning authority. The rooftop plant and screening shall thereafter only be provided in accordance with the approved details.

Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).
16. All of the existing external walls on the rear elevation which will become internal walls as a result of the upper floor extensions (floors 4 – 10) shall be retained unaltered (retaining any unaffected windows and doors) and dry-lined.

Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

17. Detailed drawings (including their fixings and finish) and a sample casting of the cast iron decorative grilles shall be submitted to the local planning authority prior to the commencement of any development works on site.

Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

19. No development works shall commence on site until full construction details of the link podium roof and associated glazing between block A and block B (including gutters, rainwater pipes etc.) is submitted to and approved in writing by the local planning authority. Thereafter the development shall not be implemented other than in accordance with the approved details.

Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

20. No re-pointing of brickwork is authorised by this consent without prior approval of details. Proposals shall be submitted to and approved by the Council as local planning authority before the work is begun, and the work shall be carried out in accordance with such approved proposals.

Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

21. No development works shall commence on site until a schedule of all internal sundry fixtures and fittings of intrinsic value to the fire station has been submitted to and approved in writing by the local planning authority. Thereafter, best endeavours shall be made to retain the sundry fixtures or fittings identified in the schedule in their existing location. Should the development works prevent the retention of these fixtures and fittings in their existing location, then best endeavours shall be made to relocate the fixtures and fittings within the building in accordance with full details of such that have been submitted to and approved in writing by the local planning authority in advance of the commencement of any building works on site. No sundry fixtures and fittings of intrinsic value to the fire station as identified in the schedule of such shall be removed or altered without the expressed written consent of the local planning authority.

Reason: In order to safeguard the special architectural or historic interest of the building (Unitary Development Plan Policy 45 and Core Strategy Policies S9 and PN2).

Informatives

2. Internal secondary glazing is recommended as a means of improving the thermal performance of the building.

Conservation Area Consent Application 10/04476/CON:
Demolition of brigade workshop/office buildings on land bounded by Lambeth High Street to the west, Whitgift Street to the north, Southbank House to the south and railway viaducts to the east.

Conditions

1. The works hereby permitted shall be begun before the expiration of three years from the date of this consent.

Reason: To comply with the requirements of Section 18(1)(a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

2. The works of demolition hereby approved shall not be commenced before contract(s) for the carrying of the works of redevelopment of the middle site, including the works contract, have been made and evidence of such contract(s) has been submitted to and accepted in writing by the Council as local planning authority and planning permission has been granted for the redevelopment for which the contract(s) provide.

Reason: To ensure that premature demolition does not take place to the potential detriment of the character and appearance of the conservation area (Unitary Development Plan Policy 47 and Core Strategy Policies S9 and PN2).