For advice on how to make further written submissions or to register to speak on this item, please contact Governance & Democracy by emailing democracy@lambeth.gov.uk or telephoning 020 7926 2170. Information is also available on the Lambeth website www.lambeth.gov.uk/democracy
Site address
York House, 199 Westminster Bridge Road London, SE1 7UT

Ward
Bishop’s

Proposal
Demolition of York House and the Florence Nightingale Public House and the redevelopment of the site comprising the erection of a 19 storey building (plus basement) to accommodate student accommodation and ancillary facilities (Use Class Sui Generis; 35,926 sqm GIA; 1,093 bed spaces), a college (Use Class D1; 6,340 sqm GIA) and affordable workspace (Use Class B1; 382 sqm GIA) and associated servicing arrangements, landscaping, new public realm and public realm improvements.

The application is a PSI application referable to the Mayor of London pursuant to the requirements of the Town and Country Planning (Mayor of London) Order 2008.

The development is EIA Development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The application is accompanied by an Environmental Statement.

Application type
FULL

Application ref
12/04421/FUL

Validation date
28th November 2012

Case officer details
Name: David Smith
Tel: 020 7926 1256
Email: dsmith1@lambeth.gov.uk

Applicant
Urbanest UK Ltd

Agent
Gerald Eve LLP

Considerations/constraints
Environment Agency Flood Zone
Central Activities Zone
London Plan Opportunity Area
UDP Major Development Opportunity
Archaeological Priority Area
London Plan Thames Policy Area

Recommendation(s)
Resolve to grant planning permission, subject to conditions and completion of a S106 agreement; for referral thereafter to the Mayor and Secretary of State.

For advice on how to make further written submissions or to register to speak on this item, please contact Governance & Democracy by emailing democracy@lambeth.gov.uk or telephoning 020 7926 2170. Information is also available on the Lambeth website www.lambeth.gov.uk/democracy
Report Review

<table>
<thead>
<tr>
<th>Department(s) or Organisation(s)</th>
<th>Date consulted</th>
<th>Date response received</th>
<th>Comments summarised in para</th>
</tr>
</thead>
<tbody>
<tr>
<td>Governance &amp; Democracy (legal)</td>
<td>17/01/13</td>
<td>17/01/13</td>
<td>Throughout</td>
</tr>
</tbody>
</table>

Consultation

<table>
<thead>
<tr>
<th>Department(s) or Organisation(s)</th>
<th>Consulted? (y/n)</th>
<th>Date response received</th>
<th>Comments summarised in report? (y/n)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Internal</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Arboricultural Officer</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conservation and Design</td>
<td>Yes</td>
<td>17/01/13</td>
<td>See section 5</td>
</tr>
<tr>
<td>Crime Prevention Design Advisor</td>
<td>Yes</td>
<td>15/01/13</td>
<td>See section 5</td>
</tr>
<tr>
<td>Noise and Pollution</td>
<td>Yes</td>
<td>05/01/13</td>
<td>See section 5</td>
</tr>
<tr>
<td>Parks and Open Spaces</td>
<td>Yes</td>
<td>07/11/12</td>
<td>See section 5</td>
</tr>
<tr>
<td>Performance, Strategy and</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Regeneration</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Planning Policy</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Regeneration</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Streetcare</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transport</td>
<td>Yes</td>
<td>15/01/13</td>
<td>See section 5</td>
</tr>
<tr>
<td><strong>External</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GLA/Mayor</td>
<td>Yes</td>
<td>15/01/13</td>
<td>See section 5</td>
</tr>
<tr>
<td>Thames Water</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transport for London</td>
<td>Yes</td>
<td>21/12/12</td>
<td>See section 5</td>
</tr>
<tr>
<td>English Heritage</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>English Heritage – Archaeology</td>
<td>Yes</td>
<td>06/12/12</td>
<td>See section 5</td>
</tr>
<tr>
<td>CABE</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Network Rail</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Environment Agency</td>
<td>Yes</td>
<td>19/12/12</td>
<td>See section 5</td>
</tr>
<tr>
<td>Natural England</td>
<td>Yes</td>
<td>11/12/12</td>
<td>See section 5</td>
</tr>
<tr>
<td>Association Of Waterloo Groups</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lambeth Estates Residents</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Association</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Waterloo Community Development</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Group</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Waterloo Quarter Business Area</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kennington Oval &amp; Vauxhall Forum</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>South Bank Employers Group</td>
<td>Yes</td>
<td>09/01/13</td>
<td>See section 5</td>
</tr>
<tr>
<td>Kennington Association</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>County Hall Residents Association</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

For advice on how to make further written submissions or to register to speak on this item, please contact Governance & Democracy by emailing democracy@lambeth.gov.uk or telephoning 020 7926 2170. Information is also available on the Lambeth website www.lambeth.gov.uk/democracy
<table>
<thead>
<tr>
<th>Organization</th>
<th>Status</th>
<th>Date</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Friends of Jubilee Gardens</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Friends of Archbishop’s Park</td>
<td>Yes</td>
<td>26/12/12</td>
<td>See section 5</td>
</tr>
<tr>
<td>Waterloo Quarter Bid</td>
<td>Yes</td>
<td>14/01/13</td>
<td>See section 5</td>
</tr>
<tr>
<td>Westminster</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Camden</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Southwark</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wandsworth</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Households</td>
<td>Yes</td>
<td>2 received at time of writing – both in support</td>
<td>See section 5</td>
</tr>
</tbody>
</table>

**Background Documents**
Case File (this can be accessed via the Planning Advice Desk, Telephone 020 7926 1180)
EXECUTIVE SUMMARY

The application site is inclusive of the now vacated Florence Nightingale Public House, York House and some adjacent railway arches; located adjacent to the road junction of Westminster Bridge Road and Lambeth Palace Road.

Planning permission is sought for the Demolition of York House and the Florence Nightingale Public House and the redevelopment of the site comprising the erection of a 19 storey building (plus basement) to accommodate student accommodation and ancillary facilities, a college (Use Class D1) and affordable workspace (Use Class B1) and associated servicing arrangements, landscaping, new public realm and public realm improvements.

The application was subject to extensive pre-application discussion with Lambeth Officers as part of a Planning Performance Agreement. In this instance the applicant has responded positively and openly to all advice given. It must therefore be borne in mind that the merits of the scheme currently before the Local Planning Authority (LPA) for consideration have been largely and positively influenced by the extensive pre-application negotiations and discussions that preceded the application submission.

The offices and public house are surplus. The existing offices building were built in the 1960s to a specification obsolete for contemporary office occupiers. The current market for second hand office space in this location would not secure rents that would warrant refurbishing the building in its existing frame. In addition, the public and regeneration benefits of the scheme far outweigh the loss of the long time vacant public house.

The development proposes a mix use uses entirely appropriate for the Central Activities Zone, having regard to the relevant development plan Policies. It offers significant and substantial planning benefits inclusive of the following:

- A significant contribution towards addressing London’s Student Housing needs in accordance with the expectation set out in the London Plan that LPAs will give strong support for London’s higher and further education institutions;
- The provision of education facilities that will contribute to the LBL Core Strategy (2011) objective for Waterloo to be a major location for higher education;
- The development of affordable workspace providing approximately 40 work stations designed and managed specifically to attract small, start-up companies;
- The regeneration of a rundown out dated site with a high quality development fitting for such a central London location at the gateway into Waterloo station;
- The improvement of the public realm (including the railway arches) in order to gain legibility for pedestrians and improve linkages to the Riverside and the Lower Marsh areas and through the area generally;
- Employment creation on the completion and occupation of the development, with an estimated 236 jobs arising.
- Significant provisions for general employment and training initiatives and for training for local labour in construction;
- Circa £11m per annum increased local spending arising as a result of the development once complete and occupied;
• A full package of s.106 obligations, amounting to £1.66m in total, towards local improvements and infrastructure and specifically £766,788 towards Archbishop’s Park, which will also provide residual benefit for local residents/visitors who will be able to benefit from the improvements; and
• The use of a swimming pool exclusively and free of charge by Local/Lambeth School groups.

Whilst English Heritage has objected to the development in terms of the impact upon the Outstanding Universal Value of the Westminster World Heritage Site (WWHS), neither Lambeth Officers nor the GLA/Mayor shares that opinion. The relationship between the proposal and the WWHS has been comprehensively demonstrated in the application submissions and, where visible, Lambeth Officers are firmly of the view that the proposal would not cause harm to the setting of this heritage asset and would not compromise its Outstanding Universal Value and the viewer’s ability to appreciate this. The development proposal sits inside the building envelope that the LPA approved for an extant office scheme – as recently as January 2013. At that time no objection was raised by any stakeholders to the impact of the massing of the office scheme upon the setting of the WWHS. It is considered that the sinuous sculptural form of the building is attractive; whilst the use of pale tone used for cladding will not be incongruous in its setting. Overall the development would deliver a high architectural quality which responds successfully to the character of the area.

The development would achieve BREEAM Excellent, whilst all necessary reductions in total carbon dioxide emissions from the development have been achieved within the framework of the energy hierarchy to satisfy the policy requirements of the London Plan and Lambeth’s Core Strategy.

The development would not prove unacceptably harmful to the residential amenity of neighbouring properties; would suitably minimises opportunities for crime; would secure improvements to the bio-diversity value of the site; would provide a welcome reduction in surface water run-off, having regard to the conditions and constraints of the site; and would not impact unacceptably upon the highway network or public transport capacity in the locality. This is verified by the various consultations received. Indeed, apart from English Heritage no objections have been raised against the scheme; including from local residents.

The development would be inclusive of an extensive and full package of s.106 obligations, considered reasonable to mitigate the otherwise unacceptable impacts of the development upon local infrastructure. The package has been negotiated having regard to the expectations set out in policy, to the details of the scheme and to the substantial planning/public benefits that the scheme would deliver. Each of the obligations has also been negotiated having regard to the statutory tests set out in the Community Infrastructure Levy Regulations 2010; namely they are considered: (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. These would also provide residual benefit for local residents/workers/visitors who will be able to benefit from the improvements.

In short, this is a sustainable development that would deliver substantial public benefit. The development would be in general compliance with the Development Plan for the Borough and there are no material considerations of sufficient weight that would dictate that the application should nevertheless be refused. Officers are therefore
recommending approval of the scheme in accordance with the presumption in favour of sustainable development conferred upon Local Planning Authorities by the National Planning Policy Framework (NPPF).

Officers are recommending that the PAC resolve to grant planning permission, subject to conditions (to be provided by second despatch) and to the satisfactory completion of a s.106 agreement; and subject to referral to the Mayor and to the Secretary of State (SoS).
Summary of Main Issues

The main planning considerations pertaining to this application are as follows:

i. The loss of the existing offices and public house;

ii. The design quality of the development, having particular regard to the impact of the development upon the special interest of recognised heritage assets in the vicinity of the site, particularly the setting of the World Heritage Site of the Palace of Westminster;

iii. Whether the development would sufficiently mitigate its impacts upon local infrastructure;

iv. Whether sufficient commitment is made to sustainable design and construction and to minimising carbon dioxide emissions;

v. The impacts of the development upon the function and safety of the highway network and public transport capacity; and

vi. The overall regenerative and public benefits for Waterloo and the South Bank that the development would deliver in this location.

Site Description

The application site is inclusive of the now vacated Florence Nightingale Public House, York House and some adjacent railway arches; located adjacent to the road junction of Westminster Bridge Road and Lambeth Palace Road. The site lies between St Thomas’ Hospital to the west and the tracks of Waterloo station to the east. One Westminster Bridge Road, a recently constructed 16 storey hotel and apart-hotel, is located to the north of the site upon the central island of the road junction. To the south is Beckett House which is 12 storeys in height, was erected in 1974 and which provides approximately 16,000 sqm gross floor space for offices. Beyond Beckett House are the residential blocks of Stangate House and Canterbury House.

The application site covers an area of approximately 0.58 hectares (ha).

York House is a 1960s ten-storey building. The Florence Nightingale Public House is a three storey building attached to the northern elevation of York House; there are two stories of office floor space above the ground floor public house. These buildings have a combined gross floor area of 8,864 sqm and are vacant.

To the east of York House, between York House and the Waterloo railway tracks, is an associated surface level car park. Immediately to the east of the application site are the brick viaducts of Waterloo Station, which are below the old Channel Tunnel terminal tracks. There are pedestrian and vehicular routes to Waterloo Station through the viaduct arches.

The site is adjacent to the South Bank Conservation Area and within close proximity to the Lower Marsh Conservation Area and the Lambeth Palace Conservation Area. Beyond the Island Block, on the corner of York Road and Addington Street, is the Georgian, Grade II listed General Lying-In Hospital. Fronting onto York Road are the North and South Blocks of County Hall; the
riverside building of County Hall, beyond the North and South Blocks, is a Grade II* listed building completed in 1933. The World Heritage site of the Palace of Westminster is to the west of the site beyond Westminster Bridge and the River Thames.

2.6 Canterbury House and Stangate House, both residential apartment blocks, lie to the south of site. Beyond these Archbishops Park is the largest open space in the area, measuring 10 acres. The Park is bordered by Lambeth Palace Road to the west, by Lambeth Palace and Lambeth Bridge Road to the south, and by Carlisle Lane to the east.

2.7 The Development Plan identifies the site as falling within the Central Activities Zone, the Waterloo Opportunity Area, the Waterloo Visitor Management Area, the Thames Policy Area, MDO 98 and an Archaeological Priority Area.

3 Relevant Planning History

3.1 The council’s records show a series of unimplemented planning permissions for the redevelopment of the site prior to 2007 – none of direct relevance to the current planning application.

3.2 In July 2007 permission (04/00074/FUL) was granted to demolish York House and the Florence Nightingale Public House and replace with basement, ground floor, plus part 10, part 13 storey building providing 31,562 sqm of offices (B1 floor space) and 172 sqm of retail/café (A1/A3) floor space on the ground floor. The approved scheme would have reached a maximum height of 62.4m AOD. The redevelopment included environmental improvements to the areas around both York House and Beckett House. The permission was not implemented and expired on 4th July 2012.

3.3 On 23 May 2008, the council granted planning permission for the “demolition of York House and erection of a new building comprising of two basement levels, ground and fifteen upper floors of offices (class B1), rooftop plant and a retail (Class A1/A3/A4 use) and office (Class B1) unit at ground floor, together with associated plant, access and service arrangements, disabled car and bicycle parking and landscaping works” – council’s reference 08/00629/FUL. The planning permission was subject to a raft of conditions and to a s.106 agreement. The permission should have been commenced prior to 23 May 2011.

3.4 On 2 July 2012 the council entered into a Planning Performance Agreement (PPA) with Urbanest (UK) Limited regarding the bringing forward of a student accommodation led mixed use development – the subject application.

3.5 On 9 October 2012, the Applicant submitted to the LBL an ‘Application for Prior Notification of Proposed Demolition’ for the demolition of the existing buildings (York House and the Florence Nightingale public house) and to carry out an archaeological evaluation. Lambeth thereafter issued approval.

3.6 On 8 January 2013, the council granted planning permission (11/01327/FUL) for a new planning permission in order to extend the time limit for implementation of
planning permission 08/00629/FUL. The permission granted was in the event subject to a significant up-lift in s.106 obligations relative to that previously approved under application 08/00629/FUL to reflect the evolved planning policy position at the time of determination.

4 Proposal

4.1 Planning permission is sought for the Demolition of York House and the Florence Nightingale Public House and the redevelopment of the site comprising the erection of a 19 storey building (plus basement) to accommodate student accommodation and ancillary facilities, a college (Use Class D1) and affordable workspace (Use Class B1) and associated servicing arrangements, landscaping, new public realm and public realm improvements.

4.2 The student accommodation would comprise 35,926 sqm (GIA) and would provide 1,093 bedspaces provided over floors 3 to 18. The bedspaces would be provided in both studios and cluster flats, with a common room and outdoor terrace at 18th Floor and a lower common space at ground and mezzanine levels. It is advised that 34 studio units are to be provided across the top floor of the building which would provide accommodation ancillary to the main uses of the building but would not be restricted solely for student occupation – e.g. for visiting parents or guest lecturers.

4.3 The college use would be provided across levels 1 and 2 of the building, providing 6,340 sqm (GIA) of D1 floorspace. Teaching spaces are designed in two rings, an outer ring adjacent to the building façade that will gain views of the surrounding landscape and an inner ring that will provide views over the interior atrium space. Cuts in the floor plan provide breakout or common room space for the students and divide the college into 3 segments for potential departmental separation. It is proposed that Alpha College will take the tenancy of the space and the accommodation has been design around their accommodation brief.

4.4 The development proposes 382 sqm (GIA) of affordable workspace (Use Class B1) at ground and mezzanine levels; provided with a separate entrance at the north eastern corner of the development. The affordable workspace will provide approximately 40 work stations for small start-up businesses.

4.5 At basement level a ‘Health Suite’ is proposed, providing a swimming pool and leisure facilities for all of the residents of the development and the college. Whilst not a public facility, the pool is being offered for use to local schools during term time.

4.6 The proposed development will consist of a lower basement, basement mezzanine, ground, upper ground mezzanine level plus 18 storeys above ground. The highest roof level of the proposed development will be 66.5m Above Ordnance Datum (AOD) (approximately 62.8m above ground level). The highest point of energy plant flues will be 67.5m (approximately 63.8m above ground level).

4.7 To the north, east and west the strong curve of Westminster Bridge Road determines the shape of the building. To the south, the proposed development
façade will straighten to create a strong corner. The curved form will maximise wide panoramic views of the setting from the proposed development. Significant public realm improvements are proposed surrounding the building at ground floor level. A new garden is proposed to the rear of the proposed development, accessible only by the occupants, but with the capacity to be opened up for public access should it be required at a later date.

7.8 To respond to environmental concerns such as limiting solar gain and heat loss, the façade will be part glazed (approximately 40%) and part solid (approximately 60%). It will be horizontally expressed to emphasise the given curve of the road and maximise views out from the rooms. Bands will be grouped into a 4-storey grand order and slanted to create a shallow wave. It will be fixed with high-gloss tiles and glass to reflect the surroundings and strengthen the shallow wave. Fixed glazing will be interrupted by opening vents behind a perforated metal panel. The panels will provide purge smoke ventilation as well as ‘top-up’ comfort ventilation to complement the mechanical ventilation heat recovery system. At the lower floors (ground, 1st and 2nd) the continuous glazing band will remain, however the proportion of glass to solid differs from the upper floors to reflect the change in use from residential on the upper floors to the college functions of the lower floors.

4.9 At 18th floor the facade will be predominately glazed with possible fritting to reduce solar gain. It will retreat from the line of the outer façade. This, in combination with the use of glass, will help to create a light top to the building.

4.10 The proposed development will include the following improvements to the public realm and streetscape:

- A new and improved pedestrian approach and perimeter pavement to the proposed development off Lambeth Palace Road, and permanent 24-hour security in the form of CCTV cameras located externally, passive surveillance from the overlooking residential units and active surveillance in the form of a security management team presence inside the building;
- Tall façade glazing at lower levels that will create an active frontage to Lambeth Palace Road and Westminster Bridge Road;
- A route will exist along the viaduct that could be opened up as part of future connectivity through the site. This route will not initially be accessible for public access, but should this be required later, then the proposed landscape will allow for this simple adaptation; and
- Public realm proposals introducing improved materiality, lighting and planting.

4.11 The development has committed to the achievement of BREEAM ‘Excellent’.

4.12 The application is a PSI application referable to the Mayor of London pursuant to the requirements of the Town and Country Planning (Mayor of London) Order 2008.

4.13 The development is EIA Development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The application is accompanied by an Environmental Statement.
5 consultations and responses

5.1 608 letters of consultation were sent out to neighbouring property addresses; including all properties likely to be directly affected by the development.

5.2 A site notice was displayed on 10 December 2012 and a press notice was published on 14 December 2012.

internal consultation responses

5.3 Conservation and Design – Supports the scheme

5.4 Crime Prevention Design Advisor – No objection.

5.5 Noise and Pollution – No objection

5.6 Parks and Open Spaces – Archbishop’s Park needs a lot of the sports resources updating and the master plan allows for these works.

5.7 Transport – As the application stands there are no in principle objections, although the current proposals relating to cycling parking and landscaping surrounding the site are not acceptable. These are however minor issues and can be dealt with through the submission of further details.

external consultation responses

5.8 GLA/Mayor - The application broadly complies with the London Plan however, further information and/or confirmation, as detailed below, is required to comply fully.

- Principle of use: The proposed mix of uses is acceptable, as is the loss of offices. The affordable workspace, permanent student accommodation and community use of the leisure facilities should be secured by agreement.

- Design: The design of the proposal is acceptable and will not have a harmful impact on the Palace of Westminster World Heritage Site or other strategic views. The high quality materials proposed should be secured by condition.

- Inclusive design: The proposal generally provides a good standard of inclusive design. The 10% easily adaptable rooms should be secured by the Council.

- Climate Change: The proposed carbon savings exceed the London Plan target and are welcomed. The applicant should commit to enabling future connection to a heat network, provide details of the electrical output of the CHP and commit to a single site wide energy network.

- Transport: Electric vehicle charging points should be secured, a revised footway design should be submitted and agreed with TfL and then
secured by condition. Contributions to toucan crossing resurfacing, legible London totems and bus stop improvements are required. Reinstatement of the footway following removal of the existing access to Lambeth Bridge should be secured by condition. Cycle parking needs to be amended to separate the different uses, a contribution towards the cycle hire docking station is required, and a travel plan, construction management plan and servicing management plan should be secured.

5.9 **Transport for London** – No objection, subject to conditions and s.106 obligations (see GLA comments).

5.10 **English Heritage** – Objection.

The current proposals fail to respond to their immediate environs. The strong horizontal banding and white cladding are at odds with the historic environment that surrounds it. The architecture of the proposed building is in danger of appearing as a great amorphous mass, an alien object with no contextuality to its surroundings.

The Mayor’s Guidance on the setting of London’s World Heritage Sites was published in March 2012 and includes a draft statement of Outstanding Universal Value for the Palaces of Westminster WHS. This notes that the Outstanding Universal Value is derived from a number of areas, including its historical importance emphasised by its dominance, its distinctive architectural form is still prominent, and the fact that its intricate architectural form can be appreciated against the sky.

These proposals would have a harmful impact on this defined Outstanding Universal Value of the WHS when viewed from Parliament Square. Views from Parliament Square are amongst the best available of the Palaces of Westminster, and the clear gap between the Elizabeth Tower and Portcullis House makes a significant contribution to those views by signing the relationship between the palaces and the River Thames. It allows the architectural form of the Elizabeth Tower to be readily appreciated against the open sky. The proposed development would intrude on that view, partly filling the gap between the Elizabeth Tower and Portcullis House, reducing its visual dominance and ability to be read against the sky and thus harming the Outstanding Universal Value of the World Heritage Site.

The proposed development would also impact upon the setting of the Grade 1 listed Elizabeth Tower. The significance of the tower is derived from its exceptional aesthetic, architectural and communal value as an internationally recognised symbol of London and the United Kingdom, and the ability to read its form and detail against an open sky makes a major contribution to the viewer’s ability to appreciate it. The proposed development fills the gap between the tower and Portcullis House, and would harm the setting of the listed building.

Under the terms of the NPPF, where there is harm to the significance of a designated heritage asset this harm should be weighed against the public benefits of the proposal. It is for your council to carry out this exercise, but we would consider the public benefits offered by the proposed fee-paying college
English Heritage objects to these proposals. We would like to see development come forward on this site and replace the current buildings, which are of no merit. However, we encourage your council refuse this application on the grounds of inappropriate design, which detracts from the outstanding universal value of the World Heritage Site and the significance of its Grade I listed buildings.

Since the previous decisions made on this site, a number of new policy documents and guidance have been adopted, including the London View Management Framework, the Mayor’s Guidance on the setting of World Heritage Sites and the NPPF. These documents give a robust level of protection to World Heritage Sites and the NPPF advocates that the more significant the heritage asset, the greater the weight should be given to its protection. Heritage assets do not get much more significant than the Palaces of Westminster, and your council should therefore work with the developer to secure a more appropriate design which respects its historic context.

5.11 **English Heritage: Archaeology** - No archaeological fieldwork need be undertaken *prior* to determination of this planning application but the archaeological position should be reserved by condition.

5.12 **CABE** – Although CABE were engaged at the pre-application stage, they have provided no response at time of writing

5.13 **Network Rail** – No response at time of writing

5.14 **Environment Agency** – No Objection

5.15 **Natural England** – No objection

5.16 **South Bank Employers Group** – Neither supports nor objects to the application.

The following points are however made:

- There has been no community engagement on the part of Lambeth Council on the application or the potential for local mitigation.
- The South Bank Public Realm Framework (currently being consulted upon) identifies the key elements that need addressing to ensure the area is safe, functional and able to cope with the rising footfall created by new development, increasing visitors and commuters. This should be the key document in determining public realm developer contributions. Alongside other local stakeholders we would expect to be closely involved in decisions on how the transport and public realm contributions arising from the development are prioritised and spent.
- The BID, reliant on a ballot of local businesses every five years to continue its operations, is not necessarily the most appropriate management vehicle for the incubator space.
- Existing arrangements for heritage protection in the planning system
adequate and heritage issues should not be given undue weight, but should be balanced against the overall economic and community benefits which developments give rise to.

- The ability of local residents to benefit from the new jobs available during construction and thereafter and any local procurement by new occupiers will need careful management and coordination with local organisations including SBEG and clear local leadership.
- We ask the Council to agree in principle that there should be a s106 contribution from this development to further design work and planning work for the SBEG-led South Bank Decentralised Energy Network, as was agreed with Elizabeth House Partners and Braeburn Estates.
- In addition to trees and landscaping a green roof in addition to PV cells would improve drainage, reduce the urban heat island effect and contribute to the local ecosystem.
- We support the travel plan.

5.17 **Friends of Archbishop’s Park** - The area concerned is in desperate need of re-development to make it safe, pleasant to live in and fit for purpose in a world-class city, renounced for its education standards. The support on offer to upgrade the infrastructure of Archbishop's Park is imperative if it is to cope with the rise in usage resulting from these works whilst supporting the needs of local people who require better facilities, particularly sport. It is therefore imperative that any s106 monies be ring-fenced for these purposes so we can ensure that this public space is protected and developed for the benefit of all.

5.18 **Waterloo Quarter Bid** - Waterloo Quarter is the Business Improvement District (BID) for Waterloo. Representing over 300 businesses, the BID believes that Waterloo is a destination, not just a transport interchange. It aims to create a destination where people want to spend time and money; a safer and more pleasant trading environment; a great place to set up a business; a creative and connected community in which to work.

The BID welcomes the contribution the proposed development at the York House site will make to the local area, in particular with regard to improvements to the Westminster Bridge Road railway bridge and the proposed business incubator space at ground floor.

The Westminster Bridge Road railway tunnel is currently included within the ‘Phase 2’ project area for the Lower Marsh Regeneration Project. This comprises both this tunnel and the Upper Marsh tunnel, as well as the Westminster Bridge Road itself as far as the borough boundary. However, this Phase of the project is currently only part-funded. The proposed contribution from the York House development will enable part of this phase of the project to be realised. This is a very important route to Lower Marsh and one that could play an important role in connecting the area of Waterloo to the south and east of the station with that to the north. However, it currently suffers from an extremely poor pedestrian environment and is blighted by traffic pollution. Waterloo Quarter BID is strongly supportive of the proposed contribution to improving this route, which could improve the pedestrian experience and potentially increase footfall south into the BID area.
The business incubator space is an important element of the development that also has the potential to improve links between the site and the area south of the Westminster Bridge Road railway tunnel. There is a shortage of 'micro' business space in the area, which is becoming an increasingly popular site for creative businesses. The space will go some way towards addressing this shortage, but also has the potential – through the business incubator facility – to help not only attract local entrepreneurs to set up a business in the borough, but also – if subsequently referred to other vacant premises in the area – to retain this talent within the borough.

5.19 Neighbour Consultation

<table>
<thead>
<tr>
<th>No. of Letters sent</th>
<th>No. of Objections</th>
<th>No. in support</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>608</td>
<td>0</td>
<td>2</td>
<td>0</td>
</tr>
</tbody>
</table>

5.20 Assessment

<table>
<thead>
<tr>
<th>Comments</th>
<th>Officer Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Archbishop’s park should benefit from investment as a result of this</td>
<td>The development would be inclusive of a s.106 contribution to be spent upon</td>
</tr>
<tr>
<td>development. The sports pitches and related facilities need refurbishing</td>
<td>improvements to Archbishop’s Park. The monies would be allocated via the</td>
</tr>
<tr>
<td>and so do the toilets, especially the disabled toilets and the toilets</td>
<td>council’s s.106 protocol in order to mitigate the otherwise unacceptable impacts</td>
</tr>
<tr>
<td>need electricity. There also needs to be more drinking fountains in the</td>
<td>of the development. Local residents would also benefit from the improvements</td>
</tr>
<tr>
<td>park. This development will increase the number of park users and so</td>
<td>brought about by the monies.</td>
</tr>
<tr>
<td>should invest in the park.</td>
<td></td>
</tr>
<tr>
<td>The property has been vacant for 8 years. The scheme, in contrast to</td>
<td>Agreed</td>
</tr>
<tr>
<td>the previous office permissions, will result in the regeneration of this</td>
<td></td>
</tr>
<tr>
<td>office site in the short to medium term.</td>
<td></td>
</tr>
<tr>
<td>The design of the building will represent a high quality addition to</td>
<td>Agreed</td>
</tr>
<tr>
<td>this part of Waterloo and will relate well to its surroundings.</td>
<td></td>
</tr>
<tr>
<td>The proposed mix of uses will add to the vibrant and sustainable mix</td>
<td>Agreed</td>
</tr>
<tr>
<td>within Waterloo and will benefit the local economy and especially lower</td>
<td></td>
</tr>
<tr>
<td>marsh.</td>
<td></td>
</tr>
<tr>
<td>The inclusion of affordable and flexible workspace in the development will provide support to new businesses and bring more entrepreneurs to the area.</td>
<td>Agreed</td>
</tr>
<tr>
<td>---------------------------------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>The public realm improvements will improve the area to the rear of Beckett House and the improvements under the railway will be particularly welcomed by residential tenants at Canterbury and Stangate House.</td>
<td>Agreed</td>
</tr>
<tr>
<td>The development offers community benefits – such as the enhancements to Archbishop’s Park, the environmental improvements and the access by local schools to the swimming pool.</td>
<td>Agreed</td>
</tr>
<tr>
<td>Urbanest’s other developments are of a very high quality.</td>
<td>Agreed. As part of the PPA process, Lambeth Officers have had opportunity to visit other Urbanest schemes in London – including sites in Kings Cross (under construction) and Hoxton (completed and operational).</td>
</tr>
<tr>
<td>Urbanest has credentials and pedigree in delivering major schemes in these economically difficult times.</td>
<td>Agreed. Their developments at other locations are proof of this assertion. Given conversations had during the PPA process, Officers are fully expectant that if planning permission is granted the development will be commenced without delay.</td>
</tr>
<tr>
<td>Urbanest have strong management structures and a high level of pastoral care for their students.</td>
<td>Noted</td>
</tr>
</tbody>
</table>

6 Planning Policy Considerations

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

6.4 **London Plan (July 2011)**

6.4.1 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.

6.4.2 The relevant London Plan policies include:

- 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 3.8  Housing Choice
- Policy 3.9  Mixed and Balanced Communities
- Policy 3.16 Protection and enhancement of social infrastructure
- Policy 3.18 Education Facilities
- Policy 4.1  Developing London’s economy
- Policy 4.2  Offices
- Policy 4.3  Mixed use development and offices
- 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 5.11 Green Roofs
- Policy 5.12 Flood risk management
- Policy 5.13 Sustainable drainage
- Policy 5.15 Water use and supplies
- Policy 5.18 Construction, excavation and demolition waste
- 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 6.5  Funding Crossrail and other strategically important transport
Policy 6.9 Cycling
Policy 6.10 Walking
Policy 6.13 Parking
Policy 7.2 An inclusive environment
Policy 7.3 Designing out crime
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 7.15 Reducing noise and enhancing soundscapes
Policy 8.2 Planning obligations
Policy 8.3 Community infrastructure levy

6.5 Lambeth's Local Development Framework Core Strategy

6.5.1 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 S8 – Sustainable Waste Management
Policy S9 – Quality of the Built Environment
Policy S10 – Planning Obligations
Policy PN1 – Waterloo

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 14 Parking and Traffic Restraint;
Policy 19 Active Frontage Uses;
Policy 21 Location and Loss of Offices;
Policy 24 Use of Railway Arches;
Policy 26 Community Facilities;
Policy 27 Loss of Public Houses;
Policy 29 The Evening and Late Night Economy, Food and Drink and Amusement Centre Uses
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 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 98 York House, 199 Westminster Bridge Road and Beckett House, Lambeth Palace Road – Area 1.8Ha.

6.7 National Planning Policy Framework (NPPF)

6.7.1 On 27 March 2012, the Government published the National Planning Policy Framework. This document had the immediate effect of replacing various documents including, amongst other documents, PPS1, PPS3, PPS4, PPS5, PPS12, PPG13, PPG17 and Circular 05/2005: Planning Obligations.

6.7.2 The National Planning Policy Framework sets out the Government’s planning policies for England and how these are expected to be applied. It reinforces the Development Plan led system and does not change the statutory status of the development plan as the starting point for decision making. The NPPF sets out that the National Planning Policy Framework must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. Of significance, it sets out that in assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development.

6.8 Regional Guidance

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

- London View Management Framework SPG March 2012
- SPG: Planning for Equality and Diversity in London (2007);
- SPG: Sustainable Design and Construction (2006);
- Delivering London's Energy Future: the Mayor's climate change mitigation and energy strategy (2011); and

6.9 Local Guidance

6.9.1 The council has adopted the following Supplementary Planning Documents, which are relevant:

- SPD: Safer Built Environments (adopted April 2008)
- SPD: S106 Planning Obligations (originally adopted July 2008; updated July 2010)
- SPD: Waterloo Area (October 2012 – Consultation Draft)
6.9.2 The Council’s ‘Waste & Recycling Storage and Collection Requirements: Guidance for Architects and Developers’ (2006) is also relevant.

7 Assessment

7.1 Planning Performance Agreement (PPA) Application

7.1.1 In July 2012 Urbanest (the applicant) entered into a Planning Performance Agreement (PPA) with the council in order to progress a redevelopment scheme for the site. This is a public document which set out an agreement between the developer and the council on how the pre-application process would be managed. As part of this agreement the scheme has been referred to the council’s Strategic Sites Panel. The Panel welcomed the design of the scheme and the treatment of the public realm. They considered that the main issues were the loss of employment potential on the site and the need to secure the deliverability of the student accommodation.

7.1.2 Whilst entering into a PPA by no way means that a subsequent application will be rubber stamped, PPAs are increasingly being used by Lambeth on schemes of this nature to proactively and positively engage with developers to secure developments that improve the economic, social and environmental conditions of the area; in accordance with the expectations conferred upon LPAs by the NPPF. It is advised that in this instance the applicant has responded positively and openly to all advice given. It must therefore be borne in mind that whilst this officer recommendation of approval is being presented having regard to the merits of the scheme currently before the LPA for consideration, those ‘merits’ have been largely and positively influenced by the extensive pre-application negotiations and discussions that preceded the application submission.

7.2 Land Use

Loss of Existing Offices

7.2.1 The development would result in the loss of the existing office building and public house on the site, both of which are currently vacant. Whilst the site is located in the Central Activities Zone and Waterloo Opportunity Area, it is not located within a development plan identified Key Industrial and Business Area (KIBA).

7.2.2 Core Strategy Policy S3 sets out that outside of KIBAs the council will maintain a stock of sites and premises in commercial use across the borough subject to the suitability of the site and location. At this time Core Strategy Policy S3 is supported by Saved UDP Policies 21 and 23.

7.2.3 In accordance with Saved UDP Policy 21, the conversion to other uses of surplus offices outside Key Industrial and Business Areas is permitted. The supporting text to Policy 21 goes on to state that to meet the test of being surplus in the policy there is a requirement for marketing evidence (including for redevelopment), although at times when there is significant oversupply of
office space evidence of similar buildings lying vacant in the area will suffice.

7.2.4 The existing building was built in the 1960s to a specification obsolete for contemporary office occupiers; and the external appearance is significantly dated. In particular the floor to ceiling heights would not allow for Grade A refurbishment of the office space, where most occupiers now require raised floors and comfort cooling rather than the trunking and very basic air handling offered at York House. The property was vacated by Ernst and Young in 2003 and has been vacant since that time. It is generally considered that the building has reached the end of its economic life and it has in recent years been the subject of squatting, vandalism, unauthorised entry and theft of cables.

7.2.5 The location of the site for a B1 Office use is not ideal being located at least a 5 minute walk from the nearest tube station. In Office Occupier Surveys undertaken by BNP Paribas, London Office Occupiers continually cite transport links as the most important determinant of a location. Bus routes and other connections are often viewed as secondary means of transport by commuting office workers. The site benefits from only limited river views and does not benefit directly from the amenities of the cultural quarter and the Riverside developments. The location makes this site more secondary as compared with other sites in Waterloo such as the Shell Centre and Elizabeth House.

7.2.6 The Shell Centre is one of the most prominent office locations on the South Bank, with direct access to Waterloo Station. A planning application for the redevelopment of this site has recently been received by the Council. Elizabeth House is prominently located adjacent to the Waterloo concourse with easy access to the riverside amenities and walking distance to Embankment. The redevelopment of the Elizabeth House site has a resolution to approve from the council, subject to referral to the Mayor and SoS and to the finalisation of the s.106 agreement. Both of these development sites are located within prime office locations within Waterloo. These two developments, expected to bring forward in excess of 200k sqm of B1 office floorspace, will deliver the critical mass required in order to satisfy B1 office space demand in Waterloo. By contrast, the York House site is located on the fringe of the core commercial location in Waterloo and, as such, lends itself to other uses as it will be unable to compete with the core commercial location.

7.2.7 In addition, there are numerous buildings being refurbished in and on the Southbank. Where these buildings were built in the 1970s and 80s these offer better opportunities for up-grade to modern occupier requirements. These buildings are also located in superior locations for the B1 office market. The only other B1 occupier in proximity to York House is Ernst and Young in the adjacent Becket House. It is however market knowledge that Ernst and Young have acquired offices in More London (a more traditional office location) and it is currently unknown whether they will remain in Becket House beyond their current lease expiry.

7.2.8 Given the above considerations, market commentator BNP Paribas advise that the current market for second hand office space in this location would not
secure rents that would warrant refurbishing the building in its existing frame.

7.2.9 In terms of redevelopment for employment use, the consented office scheme (see planning history) was intensively and robustly marketed over a five year period. Financial institutions are becoming increasingly selective about debt funding real estate developments and only 100% prime locations pre-let to undoubted covenants are generally considered fundable in the current market. Despite a prolonged and targeted marketing campaign, a firm interest and a pre-let for the redevelopment was not secured.

7.2.10 Looking to the future, the Council are currently developing a new type of economic development strategy for the borough; whereby the council will be looking to form new relationships with developers, investors, businesses and residents to realise forecasts of potential growth opportunity. The council intend to define and embrace economic growth within Lambeth, making it one of London’s pre-eminent economic nodes. It is anticipated that the full vision will be set out in a Prospectus for Growth, which will in time be presented to the Councils cabinet for formal ratification. Of particular relevance, it is anticipated that under the new Prospectus for Growth Waterloo will develop into a new business quarter for London with high quality, high value commercial development. This is reflective of the London Plan designated Opportunity Area status of the area. It is considered that the loss of the York House office use will not prejudice Lambeth’s aspirations for Waterloo in the longer term, as the critical mass required in order to satisfy market demand for B1 office space will occur within the core commercial development areas.

7.2.11 Saved UDP MDO 98 relates to both York House and Becket House, whilst Core Strategy Policy PN1 relates to Waterloo. There is however no explicit expectation set out in either of these policies that the York House site should be retained for its existing office use.

7.2.12 Lambeth Officers are therefore satisfied that the existing offices are surplus and that in such circumstances there is no policy objection to their loss.

Loss of Public House

7.2.13 Saved UDP Policy 27 relates to the loss of public houses and sets out that proposals which would involve the loss of public houses (in whole or part, and in particular the ground floor public house use in traditional, purpose-designed buildings) to non-A class use, will only be permitted if the site is outside the Central London Activities Zone and if it is demonstrated that there is no reasonable prospect in the medium term of re-use or refurbishment for an environmentally acceptable A class use, following a thorough marketing exercise and having regard to regeneration proposals in the area.

7.2.14 The public house has been a long time vacant and has offered no community benefit or active frontage use during that period. In addition, the redevelopment of the whole site (inclusive of Becket House) has been identified as a Major Development Opportunity (MDO 98 where there is no mention of a need to retain the pub) in the development plan and the Draft Waterloo Master Plan. There are alternative drinking establishments in the
vicinity, including at the adjacent hotels and in Lower Marsh. Furthermore, the loss of the pub was accepted by the LPA when it resolved to grant permission for the extant office scheme.

7.2.15 In accordance with Saved UDP Policy 19, the development would promote urban vitality and regeneration as is appropriate at this location, with active frontages, uses and entrances oriented towards the street.

7.2.16 In short, the public and regeneration benefits of the scheme far outweigh the loss of the long time vacant public house.

Proposed Uses

7.2.17 Core strategy Policy PN1 identifies that the Council will support and enhance Waterloo as a key part of Central London and Lambeth and its economy in its various roles as an international centre for culture and arts as part of the London Plan South Bank/Bankside Strategic Cultural Area; a pre-eminent international, domestic and local tourist/leisure and entertainment area; a major location for offices, hotels, healthcare and higher education; a mixed residential area with appropriate supporting community, service and shopping facilities; its valued historic character and its role as being one of London’s most important transport hubs. In this context the development proposes a range of uses appropriate to the Central London location.

Provision of Student Accommodation

7.2.18 The London Plan identifies that London’s universities make a significant contribution to its economy and labour market. It is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. While there is uncertainty over future growth in the London student population and its accommodation needs, there could be a requirement for some 18,000-27,000 places over the 10 years to 2021. New provision may also tend to reduce pressure on other elements of the housing stock currently occupied by students, especially in the private rented sector. The SHLAA/HCS has identified capacity for over 17,000 student places 2011-2021.

7.2.19 In this context London Plan Policy 3.8 sets out that planning decisions should ensure strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes. If the accommodation is not robustly secured for students, it will normally be subject to the requirements of affordable housing policy.

7.2.20 Pursuant to London Plan Policy 4.10, boroughs are expected to give strong support for London’s higher and further education institutions and their development, including recognising their needs for accommodation.

7.2.21 The development would offer some 1,093 bedspaces, all firmly secured under the s.106 as student accommodation and/or, in respect the 34 studios at 18th
floor level, as ancillary to the other uses of the site (e.g. visiting parents and guest lecturers). It is advised that the Alpha Plus Group have already confirmed that detailed commercial terms have been agreed to lease at least 200 of the student bed spaces for the DLD College students. In addition, LSE have an agreement for 450 of the bed spaces. In the circumstances, the affordable housing policies would not apply.

7.2.22 In the first instance it must be accepted that the development would undoubtedly contribute significantly towards addressing London’s Student Housing needs in accordance with the expectation set out in the London Plan that LPAs will give strong support for London’s higher and further education institutions. The site has excellent access to public transport so would allow resident students easy access to a range of institutions. In addition, the provision of student accommodation will also alleviate the demand for private rented accommodation in the local area.

7.2.23 In the second instance, officers also accept that the development would not compromise the boroughs capacity to meet the need for conventional dwellings, especially affordable family homes, or undermine policy to secure mixed and balanced communities. In this regard it must be noted that the site is not specifically earmarked for conventional dwellings in the development plan, and indeed most recently secured a planning consent for an office redevelopment. In addition, the development would not be adding to or creating a concentration of student residences in this location that would act to distort the balance and mix of the community.

7.2.24 Core Strategy Policy S2 sets out that the council will meet the boroughs housing needs to 2025 by supporting proposals for other specific types of accommodation such as student housing.

7.2.25 Core Strategy Policy PN1 relates specifically to Waterloo. It sets out that the Council will support and enhance Waterloo as a key part of Central London and Lambeth and its economy. Waterloo is identified specifically as a suitable location for, amongst other uses, higher education and mixed residential development. Student accommodation is an entirely appropriate use for the Central Activities Zone.

Provision of the College

7.2.26 Alpha Plus Group have confirmed by letter that detailed commercial terms have been agreed with the developer for DLD College to lease the D1 facility at completion. It is also proposed to lease at least 200 of the student bed spaces for the DLD College students. The Alpha Plus Group know the developer, having occupied one of their developments in Hoxton for the last three years. It is the Alpha Group’s intention to merge and relocate both the DLD College and the Abbey College London from their current locations in Westminster to this proposed new facility, under the name of DLD College.

7.2.27 The construction of a sixth form college with capacity for 700 students would have a beneficial effect on the provision of education facilities within the LBL, as the provision of facilities for students to study for GCSE and A level
qualification will contribute to the LBL Core Strategy (2011) objective for Waterloo to be a major location for higher education.

7.2.28 In accordance with Saved UDP Policy 26, the site is ideally located for the college use, being within the Central Activities Zone and easily accessible by public transport. The building and accommodation has been designed with detailed input from the future occupier so as to ensure that the facilities are appropriate for their purpose, whilst the location, nature and scale of the proposal is such that it will not impact unacceptably upon the amenities of the area.

Provision of the Incubator Workspace

7.2.29 Saved UDP Policy 21 sets out that smaller scale offices will be permitted where they are appropriate to the character and the function of the area and if they are on sites previously or currently used for employment purposes appropriate in scale to the character and public transport accessibility of the area.

7.2.30 The development proposes 382 sqm (GIA) of affordable workspace (Use Class B1) at ground and mezzanine levels; providing approximately 40 work stations. It is designed specifically to attract small, start-up companies. The office space would provide meeting rooms and pods for small to medium sized enterprises (SMEs) to acquire office space on flexible short term leases. Similar concepts already exist elsewhere and there is strong demand from SMEs for this type of affordable office space on the South Bank. The provision of the Incubator space is an immensely positive facet of the development and the employment opportunities it will offer are a significant public benefit.

7.2.31 A Waterloo Business Improvement District (BID) has been established in this area, and also encompasses properties within Southwark. The BID has regeneration ambitions for the area and promotes and supports the area through a range of physical improvement projects and marketing initiatives. It is proposed that the BID manage the Incubator Workspace.

Other Public Benefits

7.2.32 In terms of regeneration, the site falls within the Railway Character Area, as defined in Core strategy PN1. This area is dominated by railway infrastructure. The main rail station building and its platforms and tracks occupy a large swathe of land, as do the major road junctions. The railway viaduct, IMAX roundabout and Waterloo Road constitute a confusing, traffic dominated environment alienating to pedestrians. A shared aspiration is the improvement of the public realm at Waterloo in order to gain legibility for pedestrians and improve linkages from the station both to the Riverside and the Lower Marsh areas and through the area generally. Via the s.106, the development would deliver significant public realm improvements around the site and to the railway arches connecting the site with Lower Marsh, together with Legible London signage to improve legibility. These are substantial public benefits that align with the regeneration aspirations for the area.
7.2.33 The Developer has a proven track record of delivering high quality development schemes in the current economic climate. Officers are fully expectant that should planning permission be granted, the development would be built out and the associated benefits delivered. From discussions with the developer, it is understood that they are targeting completion for commencement of the 2014 academic year. This contrasts with the extant office scheme which, despite achieving planning permission in 2009 and active marketing, has not been progressed.

7.2.34 The proposed development will have a beneficial effect on employment creation on the completion and occupation of the proposed development, with an estimated 236 jobs arising, of which 205 jobs are likely to be taken by workers from the Greater London area. It is anticipated that the college will employ circa 125 staff, of which 110 are expected to be teaching staff supported by 15-20 support, administration and welfare staff. It is anticipated that the Incubator will generate a further 40 full time and 25 part time employment opportunities. In addition, further employment potential is offered in the management, operation and maintenance of the student accommodation and associated leisure suite. This job creation is considered a significant public benefit that would derived from the scheme, especially when considering that the site has not provided meaningful employment for a considerable period.

7.2.35 Core Strategy S3 sets out that the council will support employment and training schemes to maximise local employment opportunities and help to address skills deficits in the local population. In this context the development would be inclusive of financial contributions of £48,540 and £50k towards general employment and training initiatives and towards training for local labour in construction respectively. In addition to the financial contribution, the developer would also promote opportunities for local labour in the construction of the development as is set out in the s.106 section of this report. These are without doubt substantial public benefits that would be derived from the development, that align with the council’s aspirations of reducing worklessness in the borough.

7.2.36 The development would also deliver local/public benefit through increased local spending arising as a result of the development once complete and occupied. In addition to the direct expenditure of residents living in the proposed development, there will be increased indirect local spending arising from the new people working at the site and from local businesses/employees servicing the site. The ES estimates that given the nature and quantum of development, in the region of £11m per annum in expenditure would result, greatly benefiting local business and the community.

7.2.37 The development is also inclusive of a full package of s.106 obligations. This amounts to circa £1.66m in total towards local improvements and infrastructure and specifically £766,788 towards Archbishop’s Park. Whilst the contributions are necessary to mitigate the otherwise unacceptable impacts of the development, they will nonetheless also provide residual benefit for local residents/visitors who will be able to benefit from the improvements.
7.2.38 The developer has also agreed to make the Indoor Sports Facilities available exclusively and free of charge to Local/Lambeth School groups between the hours of 10:00 am to 12:00 pm and 2:00 pm to 4:00 pm on Mondays to Fridays during Term Time, subject to the schools providing appropriate supervision. This of itself is a public benefit and helps connect the development to its community.

7.2.39 In conclusion, the development would deliver a policy compliant mix of uses and substantial public benefit; without unduly prejudicing any aspirations that Lambeth may have in the medium to long term for Waterloo.

7.3 Quality of the Accommodation

7.3.1 The college accommodation has been designed to the specific development brief of the college themselves so that there is no reason to question that the space will be fit for purpose. In addition, the fit out specification of the Incubator space would be secured via the s.106 so as to maximise the benefit of that provision.

7.3.2 In terms of the student accommodation, Urbanest have a proven track record of providing high quality student residences. A mix of accommodation is proposed, including studios, cluster rooms (some with en-suites and other without) and twin bedrooms. The mix of accommodation offers students a range of price points for rental and sharing. Communal living and kitchen areas are found across the floors, but many are located on the ends of the plan to maximise the views of the city. In addition, two common room spaces are proposed to the ground floor and the 18th floor, an 18th floor terrace would be accessible and the development is inclusive of the leisure suite facilities and external amenity spaces. A typical studio unit would measure 20sqm, a typical non en-suite cluster unit would measure 8sqm, a typical en-suite cluster unit would measure 12sqm and a typical twin room would measure 23sqm. Neither the London Plan nor Lambeth has size standards for student accommodation, but there is no reason to suggest that these units will not be large enough for purpose, especially given the amenities that are associated with them.

7.3.3 5% of the rooms would be fully accessible and a further 5% designed to be converted to accessible rooms if required. This is in accordance with the relevant London Plan requirements and would be secured by planning condition. The site has level access from the street and there is level access throughout the development, apart from studios on the 18th floor, which have mezzanine bedrooms. However, reasonable alternative units on the 17th floor are available.

7.3.4 With regards to the suitability of the site for the proposed uses, glazing specifications and façade insulation design would control ambient noise affecting the residential and college areas. Existing vibration levels are low and groundborne noise is expected to be below commonly adopted UK criteria. As such, the site is considered suitable for its intended use as a college and residences.
7.3.5 As part of the EIA, wind tunnel testing was undertaken. The testing identifies that all pedestrian thoroughfares, proposed building entrances and external amenity areas within the proposed gardens at ground level will experience conditions which are suitable for their intended use throughout the year. The wind tunnel testing indicated that the central courtyard and terrace on the 3rd floor will be suitable for sitting during the summer; whilst mitigation has been incorporated at 18th floor level into the design of the terrace in the form of a series of vertical privacy screens that break up the length of the terrace into individual spaces for the residential units, as well as the 18th floor common room. Such measures shall ensure suitable wind environments for the outside spaces of the development.

7.3.6 It would be the case that certain of the internal court yard facing student units on the lower floors (up to the 7th floor) would experience levels of day lighting less than would be expected under BRE guidelines for bedrooms. 50 (5%) in total would fail the target Average Daylight Factor of 1%; the very lowest rooms at 3rd floor level experiencing significant failings and the failings decreasing with height. Notwithstanding, in terms of considering the quality of accommodation to be provided the BRE daylight failings need to be weighed against the alternative amenities that the development offers as a whole; inclusive of access to well lit and sizeable communal spaces, access to the leisure suite, the external communal amenity spaces and the fantastically connected location of the development. Where over 95% of the student rooms would comply with the BRE guidelines, it is considered that the limited BRE failings would not warrant refusing planning permission – especially when regard is had to the substantial public and planning benefits that the development would otherwise deliver.

7.3 Design

Principle of Development

7.3.1 The site is recognised in the development plan as being one for redevelopment and already benefits from an extant planning permission for a major office redevelopment. MDO98 states that Development should enhance views from House of Parliament/Westminster Abbey World Heritage Site and not detract from the setting of County Hall. It should form a coherent link and set of streets and spaces between the Royal Street and One Westminster Bridge site.

7.3.2 The proposed building envelope has been purposely designed to fit within that of the extant office scheme.

Policy Context

7.3.3 The local policy context is the Waterloo Area SPD, LBL Core Strategy policies S9 and PN1, as well as Saved UDP Policies 19, 31, 32, 33, 35, 39, 40, 41, 45, 46 and 47. The wider context is the Waterloo Opportunity Area Planning Framework (2007), London Plan, Westminster World Heritage site Management Plan, London View Management Framework (LVMF) SPG (2012) and the CABE/EH guidance on tall buildings.
Heritage Assets

7.3.4 The site is not subject to any particular conservation designations, but it is an extremely sensitive site in conservation/urban design terms. The site is located adjacent to the South Bank Conservation Area and within close proximity to the Lower Marsh Conservation Area and the Lambeth Palace Conservation Area. Beyond the Island Block, on the corner of York Road and Addington Street, is the Georgian, Grade II listed General Lying-In Hospital. Fronting onto York Road are the North and South Blocks of County Hall; which are locally listed. The riverside building of County Hall, beyond the North and South Blocks, is a Grade II* listed building completed in 1933. St Thomas Hospital to the west of the site along Lambeth Palace Road and Westminster Bridge, located south east of the site, are both Grade II listed properties. In addition, the World Heritage site of the Palace of Westminster is to the west of the site beyond Westminster Bridge (Grade II* listed) and the River Thames.

7.3.5 The proposed development site is located approximately 500m from the Westminster World Heritage Site and other heritage assets, notably the former County Hall. It would also be visible within designated views in the vicinity. The Circular on the Protection of World Heritage Sites (07/2009) establishes the Government’s objective to protect each World Heritage Site through conservation and preservation of its outstanding universal value. It sets out that World Heritage Sites and their settings, including any buffer zone, should be protected from inappropriate development. The Circular identifies the setting of a World Heritage Site as the area around it (including any buffer zone) in which change or development is capable of having an adverse impact on the World Heritage Site, including an impact on views to or from the site.

7.3.6 There are a number of new and enhanced policies in relation to World Heritage Sites, as set out in the 2011 London Plan, setting out that schemes should not compromise a viewer’s ability to appreciate its Outstanding Universal Value, integrity, authenticity or significance. In addition, the NPPF states that applications for development affecting the setting of a designated heritage asset should preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset. When considering applications that do not do this, local planning authorities should weigh any such harm against the wider benefits of the application. The greater the negative impact on the significance of the heritage asset, the greater the benefits that will be needed to justify approval. In addition the Mayor’s World Heritage Sites SPG and the London View Management Framework (LVMF) SPG provide guidance on such circumstances and the application is supported by a townscape, heritage and visual impact assessment within the Environmental Statement.

7.3.7 In the context of the surrounding heritage assets, a design of the highest quality and great sensitivity to its context is essential.
7.3.8 The scheme proposes a 19 storey building plus basement (+66.50m) to accommodate student accommodation, college, affordable workspace and health suite. The site and surrounding area have been identified within the Waterloo SPD as being sensitive to tall buildings. The SPD does not provide general guidance on appropriate tall building heights for this area, but instead indicates that there is the potential to build taller, subject to the design of the proposals satisfactorily addressing views and the setting of heritage assets. The proposal will be visible from a number of local and designated LVMF views. As a consequence, officers have considered the scheme using the LVMF visual management plans.

7.3.9 The application submission includes a townscape, heritage and visual impact assessment (THVIA) which evaluates the impact of the proposal upon strategic and local views. The THVIA demonstrates that whilst the scheme will be visible in key local and designated views, the impact upon those views and upon heritage assets would be acceptable.

7.3.10 English Heritage have raised concerns regarding the impact of the proposal when seen from Parliament Square; which would affect the setting of the grade I listed Palace of Westminster and be harmful to the Outstanding Universal Value (OUV) of the Westminster World Heritage Site (WWHS). In this regard there are a number of views taken from Parliament Square within the THVIA, although English Heritage have not referred to a specific view from the THVIA which causes concern. They do however refer to the view of Elizabeth Tower and the importance of the gap between the Tower and Portcullis House which could relate to Views 15, 16, 17, 18, 19 and 20 of the THVIA.

7.3.11 Policy 7.10 of the London Plan 2011 seeks to conserve, promote, make sustainable use of and enhance World Heritage Sites and their settings, and states that development should not cause adverse impacts on World Heritage Sites or their settings, and should not compromise the ability to appreciate their OUV, integrity, authenticity or significance. London World Heritage Sites - Guidance on Settings SPG (2012) provides a draft statement of OUV for the WWHS. This notes that the Outstanding Universal Value is derived from a number of areas, including its historical importance emphasised by its dominance, its distinctive skyline and intricate architectural form which is still prominent. English Heritage state that the proposal will intrude in the view of Elizabeth Tower from Parliament Square, partly filling the gap between the Tower and Portcullis House reducing its visual dominance and ability to be read against the sky and thus harming the OUV of the WWHS.

7.3.12 LVMF Townscape View 27B from Parliament Square to the POW provides visual management guidance for managing development in the foreground; middle and background of the view EH have raised concerns about. Visual Management guidance for LVMF 27B states that new development glimpsed in the background of views from this part of Parliament Square should be of appropriate height, scale, massing and materials to allow full appreciation of the buildings forming the World Heritage Site. View 19 of the THVIA shows
the visual impact on this townscape view (LVMF 27B.1) and shows that the proposal will be visible in the background of this view, forming part of a collection of low scale buildings which include Park Plaza, Beckett House and St Thomas Hospital and terminate the view along Westminster Bridge.

7.3.13 Although the proposal will be visible, Lambeth Officers are of the opinion that the proposed height and massing of the building (combined with its distance from the Palace of Westminster) would result in a relatively low scale development which does not compete or detract from the dominance of Elizabeth Tower or the grade II listed building 11 and 12 Bridge Street. From this view the proposal will not encroach upon the Protected Silhouette of the Palace of Westminster and will not diminish the viewer’s ability to read the Palace of Westminster against clear sky. As such the OUV of the WWHS is not considered to be harmed.

7.3.14 THVIA View 20 (LVMF 27B.2) shows a similar visual impact. The proposal will not appear in the background of the Protected Silhouette when viewed from any location along the line linking the Assessment Points of 27B.1 and 27B.2.

7.3.15 The proposal will not be significantly higher than the existing buildings in the background of the interval between Elizabeth Tower and 11 and 12 Bridge Street and sits comfortably within the envelope of the extant permitted scheme (2013). Overall, the applicant has taken into consideration the constraints of the site and has put forward a building that is of contextual height with neighbouring buildings in line with guidance from the Waterloo SPD. It is therefore considered that the development would not harm strategic views or impact negatively upon any heritage assets.

7.3.16 Notwithstanding the view of English Heritage, the recommendation of Lambeth Officer’s here is supported by GLA Officers and the Mayor who agree that the relationship between the proposal and the WWHS has been comprehensively demonstrated in the application submissions and that, where visible, the proposal would not cause harm to the setting of this heritage asset and would not compromise its Outstanding Universal Value and the viewer’s ability to appreciate this.

7.3.17 It must be borne in mind that the development proposed sits inside the building envelope that the LPA approved for the extant scheme – as recently as January 2013. At that time no objection was raise by any stakeholders to the impact of the massing of the office scheme upon the setting of the WWHS.

Public Realm and Landscaping

7.3.18 The curvilinear plan of the building, heavily influenced by the plot shape, creates a well defined edge that subtly coaxes pedestrians around the building. The building will be set back from the street between 4m and 10m producing wide pavements for pedestrians to traverse. Entrances have generous set backs from the street in order to provide a comfortable approach to the building; whilst the location of the student accommodation and college provides the opportunity for a large forecourt area which should be able to accommodate the coming and going of students.
7.3.19 The site is located within the Thames Policy Area whereby Policy 19 ‘Active Frontage Uses’ is relevant. Policy 19 encourages active frontages in development where it would promote urban vitality and/or regeneration. The scheme has uses, frontages and entrances orientated towards the street and should therefore be successful in animating the public realm and creating an enlivened edge.

7.3.20 With the use of kinetic structures, sustainable urban drainage systems, lighting and seasonal planting, the weather garden is an interesting concept which should delight, engage and encourage students to use this space. The thoughtful attention to boundary treatment should also be commended.

7.3.21 In addition, pursuant to discussions with Lambeth and CABE officers the applicant has also agreed to safeguard, maintain and repair the access strip running along the eastern part of the site between Westminster Bridge Road and Upper Marsh as a private vehicular access; but with the potential to open that back up to public access should that prove desirable in the interests of good planning for the area. This is in direct response to the fact that, whilst not proposed at the moment, future development proposals (e.g. for the adjacent railway arches and/or of the area to the south of Becket House) may prove a trigger to re-establish this pedestrian link.

Appearance

7.3.22 The design concept of the building is quite clear and commanding, where the architectural form and expression of the building is based on strata to create a sculptural aesthetic. The curved plan of the building, the gentle wave up the elevation and the ratio of glazing (40%) to solid (60%) result in a robust building with an attractive sculptural quality. The deep set glazing and ventilation bands will provide a recess and clear contrast to the chamfered ‘white bands’ of the building, reinforcing the concept of the ‘strata’. Whilst the façade treatment of the lower storeys follows the same principles and materials as the upper storeys, the increased proportion in glazing and double storey height of the ground floor creates an articulated zone (base to the building) and reflects the differing uses within the building. The articulated zone should serve to minimise the impact of the development’s height when viewed from the street. The coloured metal trims to the deep cills and soffits are playful and add another level of interest as you get closer to the building - particularly when the viewer looks up the building.

7.3.23 English Heritage have raised concern regarding the proposal’s relationship to its ‘immediate environs’ and give an example of Portcullis House as a successful contemporary interpretation of the verticality and gothic detailing of Parliament. They state that ‘the strong horizontal banding and white cladding are at odds with the historic environment that surround the site and ‘contravenes’ Lambeth’s UDP policy on Tall buildings (Policy 40). Please be advised that Policy 40 has been partially superseded and the extract EH refer to in their response has been superseded and struck-through in the current version of the UDP and should not be referenced in the assessment of this application.
7.3.24 In considering the relationship of the proposal to its context, the LPA should be satisfied that the proposal addresses the criteria set out in the CABE/EH Guidance on tall buildings regarding typography, scale, height, urban grain, streetscape and built form, and the effect on the skyline. Lambeth Officers are satisfied that the proposal addresses these criteria successfully.

7.3.25 The architectural character along the Southbank can be characterised by 20th Century large scale, stand alone buildings with a strong horizontal emphasis. These buildings include the Queen Elizabeth Hall, Purcell Rooms, Hayward Gallery Complex, IBM, National Theatre and County Hall; all of which are listed or locally listed. The horizontal forms of these buildings/area is acknowledged in the South Bank Conservation Area Statement and the Waterloo SPD. Other buildings close to the site which also have a horizontal emphasis as a result of their form, massing and detailing are St Thomas Hospital and Becket House. Lambeth Officer’s therefore disagree with English Heritage that the horizontal emphasis of the building would be incongruous to the character of the area.

7.3.26 In addition, the colour palette of buildings along the Riverside is typically pale and neutral tones due to the prevalent use of concrete, Portland stone, stone dressing and white tiles. The use of a type of white cladding to the proposed building is not out of character with the area. Subject to an approved application, the council would work with the applicant to secure a robust and suitable material for the proposal.

7.3.27 In short, it is considered that the sinuous sculptural form of the building is attractive; whilst the use of pale tone used for cladding will not be incongruous in its setting. Overall the development would deliver a high architectural quality which responds successfully to the character of the area.

7.4 Sustainability

7.4.1 Lambeth Core Strategy Policy S7 requires all major developments to achieve a reduction in carbon dioxide emissions in line with the London Plan targets through energy efficient design, decentralised heat, cooling and power systems, and on site renewable energy generation.

7.4.2 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 sets out a minimum target reduction for carbon dioxide emissions in buildings of 25% over the Target Emission Rates outlined in the national Building Regulations. The London Plan sets out that development proposals should contribute to this by minimising carbon dioxide emissions in accordance with the “be lean, be clean, be green” hierarchy:

- Be Lean: The reduction of energy demand and CO² emissions from using less energy, in particular by adopting sustainable and passive design and construction measures;
• Be Clean: Proposals for the reduction of energy demand and CO\(^2\) emissions through supplying energy efficiently;
• Be Green: Renewable energy technologies to be incorporated.

7.4.3 It is advised that the development is targeting a BREEAM Excellent rating, in line with the council’s aspirations set out in its SPD.

7.4.4 The applicant has followed the energy hierarchy and is proposing to reduce carbon dioxide emissions by 29.6%, thus exceeding the London Plan requirement. The development will reduce regulated carbon dioxide emissions down to those of a 2012 Building Regulations compliant development through energy efficiency alone. The proposed combined heat and power plant, which will provide the lead source of heat for the site wide energy network, will provide 29% carbon dioxide savings. In addition, a small amount of photovoltaic panels (100sqm) will provide a further 0.6% savings.

7.4.5 The applicant has investigated the potential to link to existing heat networks and has confirmed that there are no networks within the vicinity. The development will however be designed to allow for future connection should one become available. This would be secured by the recommended conditions, together with the commitment to a single site wide energy network.

7.4.6 It is therefore concluded that all necessary reductions in total carbon dioxide emissions from the development have been achieved within the framework of the energy hierarchy to satisfy the policy requirements of the London Plan and Lambeth’s Core Strategy Policy S7.

7.5 Neighbouring Amenity

7.5.1 The application is EIA development for the purposes of the Regulations and the accompanying Environment Statement sets out in full the Environmental Impact of the development, including in terms of impacts upon daylight, sunlight and noise environments and impacts during construction. Having regard to that information, and subject to the recommended conditions and s.106 obligations, Lambeth Officers are satisfied that the development would not prove unacceptably harmful to the residential amenity of neighbouring properties.

7.5.2 The application submissions are inclusive of management plans for both the college and the student accommodation use. These are robust and would ensure the outward impacts of the development would be minimised in terms of noise and disturbance to neighbouring properties.

7.5.3 The demolition works would be undertaken in accordance with the Demolition Method Statement already approved by the council under a previous application. In addition, the Applicant will develop and implement a Construction Method Statement (CMS) in line with the LBL Code of Practice for Construction Sites and Considerate Constructors Scheme, of which the latter ensures that contractors carry out their operations in a safe and considerate manner with due regard to passing pedestrians and road users. The CMS will apply to all trade contractors and site management, and will include detailed working procedures; specific working hours; site logistics;
traffic management procedures; communication procedures (e.g. meetings and newsletters); and complaints procedures. The commitments made within the CMS will be incorporated into a Construction Management Plan (CMP), which will include roles and responsibilities; detail on control measures and activities to be undertaken to minimise environmental effect; and monitoring and record keeping requirements.

7.5.4 The ES also demonstrates to officer’s satisfaction that no residential dwellings would experience adverse TV and Radio reception as a result of the development.

7.5.6 In terms of its impact upon neighbouring residential amenity, the development need not therefore fail against the relevant policies of the Development Plan; namely UDP Policies 7, 9, 33 and 40.

7.6 Designing Out Crime

7.6.1 The council’s Crime Prevention Design Advisor has given detailed input into the pre-application negotiations that occurred as part of the PPA process. The scheme has been designed with full regard to the relevant Secured by Design standards. In addition the development would be inclusive of s.106 monies towards improving the pedestrian environment under the railway arches. The recommended conditions and s.106 will ensure that the development suitably minimises opportunities for crime, in conjunction with saved UDP Policy 32 and Core Strategy Policy S9.

7.7 Archaeology

7.7.1 The Environmental Statement considers the archaeological implications arising from the development. English Heritage have reviewed the submissions and confirm that no archaeological fieldwork need be undertaken prior to determination of this planning application but that the archaeological position should be reserved by attaching a condition to any consent granted.

7.7.2 Lambeth Officers accept the expert advice of English Heritage and attach a condition of consent accordingly. In terms of archaeology, the development need not therefore fail against Core Strategy Policy S9 and London Plan Policy 7.8.

7.8 Bio-diversity/Ecology

7.8.1 The existing site has limited bio-diversity value. In addition, Measures to promote ecology and conservation have been included in the design of the proposed development. These include (but are not limited to) a landscaping strategy which will involve tree planting, other ground floor planting, green walls, planting of shade-tolerant plants and a green roof on the 3rd floor terrace; and the provision of bat and bird boxes in appropriate locations within the site.

7.8.2 Subject to the recommended conditions officers are accepting that the redevelopment of the site need not prove unacceptably harmful to any bio-
diversity features of acknowledged value and that opportunities could be secured to improve the bio-diversity value of the site and of the surrounding open spaces. It follows that the development need not fail against UDP Policy 39 and Core Strategy Policy S5 in these regards.

7.9 Management of Surface Water/Flood Risk

7.9.1 The submitted Flood Risk Assessment identifies that flood resistant and resilient measures will be incorporated within the design of the development. Such measures would suitably reduce the potential impact should a flood event occur at the site. The flood resistant and resilient measures as outlined would be secured by the recommended conditions.

7.9.2 The submitted surface water drainage scheme proposes a reduction of 53% from the existing run-off rate. This is a welcome reduction in surface water run-off, having regard to the conditions and constraints of the site. The surface water drainage strategy would be in general compliance with the requirements set out in the London Plan (Policy 5.13).

7.9.3 The Environment Agency are satisfied with the proposed flood resilient measures and confer that that the surface water management strategy would sufficiently contribute to achieving the preferred attenuation levels and to reducing the risk of surface water flooding, both on and off the site, subsequent to the implementation of the proposed development.

7.9.4 Officers accept the Environment Agency’s advice and thus conclude that subject to the recommended conditions, the development need not fail against the relevant policies of the Development Plan with regard to flood risk and surface water management (London Plan Policies 5.12 and 5.13 and Core Strategy Policy S6).

7.10 Transport and Highways

Site & Accessibility

7.10.1 The site is located at the junction between Westminster Bridge Road and Lambeth Palace Road. A viaduct crossing over Westminster Bridge Road forms the eastern boundary of the site, whilst to the south there are neighbouring commercial and residential properties.

7.10.2 The site is currently disused and surrounded by hoarding but previously had an active frontage on to Lambeth Palace Road and Westminster Bridge Road. There is an existing pedestrian route along the eastern boundary of the site which provides a link between Upper Marsh and Westminster Bridge Road.

7.10.3 There is an existing vehicular access to the site on Lambeth Palace Road, which historically served the 38 space car park of York House.

7.10.4 The site has exceptional access to public transport services with Waterloo, Lambeth North and Westminster stations located within walking distance and numerous bus services accessible close by. Overall the site has a Public
Transport Accessibility Level (PTAL) of 6b, which is the highest possible on the scale.

Trip Generation & Transport Impact

7.10.5 The Transport Assessment (TA) submitted with the application predicts the number of trips likely to be generated by each proposed use through the selection of appropriate sites from the TRAVL database. Given the lack of car parking provided the number of car trips generated will be negligible, although vehicle movements associated with servicing and deliveries will occur.

7.10.6 In terms of walking and cycling, it is essential that the development brings forward the necessary improvements to the public realm to ensure that the increase in trips can be accommodated in terms of both capacity and quality. In general the public realm surrounding the site is of a good standard but links through the viaduct have been identified as potential barriers to movement with a perceived lack of personal safety. In response to these concerns the applicant is proposing significant payments towards public realm works, including £679,000 towards public realm and £453,000 specifically for works to the viaduct(s).

7.10.7 The development would also be inclusive of a contribution of £7,500 towards one Legible London sign be secured through the s106 agreement. This would support the Lambeth and TfL programme to connect Waterloo to Vauxhall through a network of Legible London signs.

7.10.8 TfL are also satisfied that, subject to the s.106 provisions inclusive of £10,000 for the upgrade of a nearby bus stop, the development would not impact unacceptably upon existing capacity on key bus and underground routes.

Car Parking

7.10.9 A total of 3 disabled car parking spaces are proposed on the eastern boundary of the site underneath the viaduct. Given the 6b PTAL rating of the site and types of uses proposed, this level of parking is considered appropriate. Through the s.106 agreement the issue of parking permits to future residents will be prevented meaning that there would be no displacement of parking on to surrounding streets.

Cycle Parking

7.10.10 A total of 648 cycle parking spaces are proposed to serve the development. This will comprise 16 Sheffield cycle stands for 8 spaces, 112 Josta 2-tier stands for 224 spaces and 408 fold away bike lockers. This provision is acceptable in terms of quantity, but concern is raised at this stage by the council’s transport planner with regards to the layout and access. Notwithstanding, this issue may easily be resolved by way of the recommended condition requiring the applicant to submit further/full details.

Vehicle Access
7.10.11 The sole means of vehicle access on to the site will be via the existing access on Upper Marsh. All redundant accesses would be removed at the applicant’s expense with the footway reinstated in their place. These works are required by the recommended conditions.

Servicing

7.10.12 The frequency and type of servicing required by these proposals is not objected to and the proposed service bay within an arch would ensure that there is no impact on or disruption to the surrounding highway. A Delivery & Service Plan will be provided as part of the Travel Plan.

Highway Boundary and Landscaping Works

7.10.13 The development proposal envisages modifications to the existing footprint of buildings on the site, which will necessitate two small parcels of land to be stopped up along the site frontage on Lambeth Palace Road and Westminster Bridge Road. This would be secured via a stopping up order under Section 247 of the Town and Country Planning Act following the granting of planning permission. Although the principle of an application under Section 247 has been agreed with TfL and LBL in pre-application discussions, any final decision is subject to a statutory consultation outside of this planning process.

7.10.14 As part of the development works some landscaping is proposed on both the adopted highway and on private land immediately adjoining the highway. The applicant has confirmed that the proposals would retain a 4.2m wide footway around the site. This would be ensured by condition requiring that details of all public realm landscaping works are to be the subject of further approval by the council.

Existing Pedestrian Route

7.10.15 There is an existing pedestrian route running through the site in a north-south orientation that provides pedestrian access from Westminster Bridge Road to Upper Marsh. It is officers’ view that due to the amount of time that this route has been available to the public there is deemed to be a right of access across it and any attempt to close this route would require a Stopping-Up order. The pedestrian route is not heavily trafficked and alternative routes exist along South Lambeth road and through the railway arches. No in-principle objection is thus raised to the stopping up of the access.

7.10.16 Notwithstanding the proposal to stop up the route, pursuant to discussions with Lambeth officers and CABE the applicant has also agreed to safeguard, maintain and repair the access strip running along the eastern part of the site between Westminster Bridge Road and Upper Marsh as a private vehicular access; but with the potential to open that back up to public access should that prove desirable in the interests of good planning for the area. This is in direct response to the fact that, whilst not proposed at the moment, future development proposals (e.g. for the adjacent railway arches and/or of the area to the south of Becket House) may prove a trigger to re-establish this pedestrian link.
Travel Plan

7.10.17 A draft Travel Plan has been submitted with the application and this will form a good basis for a future detailed Travel Plan as the development comes forward in accordance with TfL’s relevant guidance ‘Travel Planning for New Development in London’. The delivery of the Travel Plan as well as the standard £1000 monitoring fee would be secured through the S106.

Student and College Management Plans (SMP & CMP)

7.10.18 An SMP and CMP has been submitted with the application and these set out the proposed management of the student accommodation and the college. With the SMP it is particularly the move in and move out periods at the beginning and end of term that have the potential to cause disruption to the highway and will require robust management. The SMP is acceptable in this respect and this plan would be secured by condition.

7.10.19 The CMP gives a good overview of the day to day operation of the college and provides details of current travel patterns from the existing college site operated by the intended end user in Marylebone.

CIL

7.10.20 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The charging rate for Lambeth is £35 per sqm. This will amount to approximately £1,468,215

Conclusion

7.10.21 As the application stands there are no transport/highways concerns that may not be suitably mitigated through the recommended conditions and s.106 provisions. Both Lambeth and TfL officers are of the opinion that the development will not impact unacceptably upon either the function or safety of the surrounding highway network. The development would be inclusive of a range of mitigation measures that would mitigate as far as is reasonable the impacts of the development upon parking stress in the area. In addition, the development would be inclusive of cycle parking, a cycle docking station contribution, improvements to the surrounding public realm and a travel plan; each reducing reliance on the private car and/or promoting more sustainable modes of transport. It is therefore considered that the development fully complies with the relevant transport policies of the Development Plan.

7.11 Refuse Storage

7.11.1 All waste infrastructure introduced to the proposed development (storage rooms, goods lifts, roads and access routes, turning heads) will comply with Building Regulations Part H6, British Standard BS5906: 2005, the Chartered Institute of Building Services Engineers Guide G and the requirements of the Duty of Care Regulations 2003. The recommended conditions will ensure the
provision of refuse storage facilities and collection requirements in accordance with the required Lambeth standards.

7.12 Land Contamination

7.12.1 All potentially harmful effects related to ground conditions during the demolition and construction of the proposed development can be mitigated to effects of negligible significance, through the implementation of mitigation measures within the Construction Management Plan and a Ground Contamination Risk Management Strategy. During demolition and construction, any identified ground contamination (including asbestos in soil) will be mitigated. The conditions of consent shall ensure compliance with Development Plan Policies in this regard.

7.13 S106 Obligations

7.13.1 The development would deliver the following s.106 obligations:

- Student Housing – All of the bed spaces may only be occupied as student accommodation, other than the 34 studio apartments (less than 3%) at 18th floor which may in addition be used ancillary or incidental to the other uses of the development (e.g. visiting parents and guest lecturers);
- Local Schools Use of the Swimming Pool – The developer shall be obliged to make the Indoor Sports Facilities available exclusively and free of charge to Local/Lambeth School groups between the hours of 10:00 am to 12:00 pm and 2:00 pm to 4:00 pm on Mondays to Fridays during Term Time, subject to the schools providing appropriate supervision;
- Safeguarded Land – The applicant would be obliged to maintain and repair the Safeguarded Land (the access strip running along the eastern part of the site between Westminster Bridge Road and Upper Marsh) as a private vehicular access to the Development subject to receipt of the Council’s proposals to reconfigure the Safeguarded Land in order to secure increased pedestrian use of the Safeguarded Land which may include securing pedestrian access between Westminster Bridge Road and Upper Marsh and the Arches if such a requirement becomes necessary in the interests of good planning for the area;
- Business Incubator Space – To provide the Incubator Space to a prescribed specification in advance of the occupation of the student accommodation; to offer a Lease to the Incubator Tenant (either the Waterloo Bid or any such other entity or organisation as agreed by the Council in writing) at a peppercorn rent without rent review for a period of not more than 50 years; where after the Incubator Tenant shall operate the premises so as to ensure compliance with an approved Incubator Strategy Plan to ensure that the workspace will be affordable and targeted at start-up companies;
- Railway Arch Contribution of £453,000 towards improvements works to the railway arches at Upper Marsh and/or Westminster Bridge Road;
- Public Transport contribution of £10,000 to be applied towards providing countdown facilities at the northbound bus stop on Westminster Bridge [requested by TfL];
- Archbishop’s Park Contribution of £766,788 to be applied towards
improvement, maintenance and/or any other associated works to Archbishop’s Park, with particular attention being given to the refurbishment/provision of sports facilities therein;

- Public Realm Streetscape Contribution of £679k to be applied towards highways/environmental improvements around the site (not within the application site) inclusive of Upper Marsh, Westminster Bridge Road, Lambeth Palace Road, Carlisle Street and Lower Marsh and other pedestrian and cycle routes to and from the site including links to local facilities;
- Legible London Contribution of £7,500 towards to delivery of one Legible London way finding sign in the local area [requested by TfL];
- Provision of a CCTV Scheme in and around the site;
- The signing up to the Considerate Constructors Scheme;
- Cycle Docking Station Contribution of £195,000 towards the provision of a new docking station(s) in the vicinity of the Site with a capacity of at least 36 cycles [TfL request];
- General Employment and Training Contribution of £48,540 towards the implementation of employment and training initiatives in the Borough of Lambeth;
- Libraries Contribution of £4,000 to be applied towards library facilities in the Borough of Lambeth;
- Local Labour in Construction Contribution of £50,000 to be applied towards local training provision to ensure that those residing or working in the London Borough of Lambeth are in a position to compete for any new employment that might arise as a result of the Development;
- Provision and adoption of a Local Training in Construction Plan in line with the Construction Industry Training Board/National Skills Academy for Construction requirements;
- The Covenanting Parties shall procure that at least one construction trainee following the Construction Training Industry Training Board apprenticeship pathway to NVQ Level 2 or above shall be employed on the Site for every £1,000,000 (one million pounds) spent on construction of the Site [Applicant’s current build cost estimate circa £80million];
- The Covenanting Parties shall procure that an average of 35% of all construction workers on the Site during the course of construction of the Development shall be work ready construction operatives provided by an agency or agencies nominated in writing by the Council’s department responsible for employment;
- Removal of eligibility of occupiers to obtain parking permits that would allow them to park in a residents parking bay within the Borough of Lambeth (unless they are the holder of a Disabled Persons Badge);

7.13.2 The above package is considered reasonable to mitigate the otherwise unacceptable impacts of the development upon local infrastructure. The package has been negotiated having regard to the expectations set out in policy (including the Council’s adopted SPD: S106 Obligations), to the details of the scheme and to the substantial planning/public benefits that the scheme would deliver. Each of the obligations above has also been negotiated having
regard to the statutory tests set out in the Community Infrastructure Levy Regulations 2010; namely they are considered: (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.

7.13.4 It is advised that the scheme will also be liable to a Mayoral CIL payment towards Crossrail implementation. This will amount to approximately £1,468,215 and is in addition to the s.106 package set out above.

8 Procedural Matters

8.1 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 sent to the Mayor under Article 4 of the Order and the Mayor’s response is summarised above at section 5.

8.2 The Council must again refer the application to the Mayor 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.

8.3 The Town and Country Planning (Consultation) (England) Direction 2009 sets out a requirement for local planning authorities to refer applications where they are minded to grant planning permission in circumstances where English Heritage has objected on the grounds that a proposed development could have an adverse impact on the outstanding universal value, integrity, authenticity and significance of a World Heritage Site or its setting, including any buffer zone or its equivalent, and has not withdrawn that objection.

8.4 The application is an EIA application, for the purposes of the Regulations. Should Members resolve to grant planning permission, and should that resolution be allowed by the Mayor and SoS to proceed, then the local Planning Authority will need to advertise its decision within the local press, as per the requirements of the Regulations.

9. Conclusion

9.1 The application site is inclusive of the now vacated Florence Nightingale Public House, York House and some adjacent railway arches; located adjacent to the road junction of Westminster Bridge Road and Lambeth Palace Road.

9.2 Planning permission is sought for the Demolition of York House and the Florence Nightingale Public House and the redevelopment of the site comprising the erection of a 19 storey building (plus basement) to accommodate student accommodation and ancillary facilities, a college (Use Class D1) and affordable workspace (Use Class B1) and associated servicing
arrangements, landscaping, new public realm and public realm improvements.

9.3 The application was subject to extensive pre-application discussion with Lambeth Officers as part of a Planning Performance Agreement. In this instance the applicant has responded positively and openly to all advice given. It must therefore be borne in mind that the merits of the scheme currently before the LPA for consideration have been largely and positively influenced by the extensive pre-application negotiations and discussions that preceded the application submission.

9.4 The offices and public house are surplus. The existing offices building were built in the 1960s to a specification obsolete for contemporary office occupiers. The current market for second hand office space in this location would not secure rents that would warrant refurbishing the building in its existing frame. In addition, the public and regeneration benefits of the scheme far outweigh the loss of the long time vacant public house.

9.5 The development proposes a mix use uses entirely appropriate for the Central Activities Zone, having regard to the relevant development plan Policies. It offers significant and substantial planning benefits inclusive of the following:

- A significant contribution towards addressing London’s Student Housing needs in accordance with the expectation set out in the London Plan that LPAs will give strong support for London’s higher and further education institutions;

- The provision of education facilities that will contribute to the LBL Core Strategy (2011) objective for Waterloo to be a major location for higher education;

- The development of affordable workspace providing approximately 40 work stations designed and managed specifically to attract small, start-up companies;

- The regeneration of a rundown out dated site with a high quality development fitting for such a central London location at the gateway into Waterloo station;

- The improvement of the public realm (including the railway arches) in order to gain legibility for pedestrians and improve linkages to the Riverside and the Lower Marsh areas and through the area generally;

- Employment creation on the completion and occupation of the development, with an estimated 236 jobs arising.

- Significant provisions for general employment and training initiatives and for training for local labour in construction;

- Circa £11m per annum increased local spending arising as a result of the development once complete and occupied;

- A full package of s.106 obligations, amounting to £1.66m in total, towards
local improvements and infrastructure and specifically £766,788 towards Archbishop’s Park, which will also provide residual benefit for local residents/visitors who will be able to benefit from the improvements; and

- The use of a swimming pool exclusively and free of charge by Local/Lambeth School groups.

9.6 Whilst English Heritage have objected to the development in terms of the impact upon the Outstanding Universal Value of the Westminster World Heritage Site (WWHS), neither Lambeth Officers nor the GLA/Mayor share that opinion. The relationship between the proposal and the WWHS has been comprehensively demonstrated in the application submissions and, where visible, Lambeth Officers are firmly of the view that the proposal would not cause harm to the setting of this heritage asset and would not compromise its Outstanding Universal Value and the viewer’s ability to appreciate this. The development proposal sits inside the building envelope that the LPA approved for an extant office scheme – as recently as January 2013. At that time no objection was raise by any stakeholders to the impact of the massing of the office scheme upon the setting of the WWHS. It is considered that the sinuous sculptural form of the building is attractive; whilst the use of pale tone used for cladding will not be incongruous in its setting. Overall the development would deliver a high architectural quality which responds successfully to the character of the area.

9.7 The development would achieve BREEAM Excellent, whilst all necessary reductions in total carbon dioxide emissions from the development have been achieved within the framework of the energy hierarchy to satisfy the policy requirements of the London Plan and Lambeth’s Core Strategy.

9.8 The development would not prove unacceptably harmful to the residential amenity of neighbouring properties; would suitably minimises opportunities for crime; would secure improvements to the bio-diversity value of the site; would provide a welcome reduction in surface water run-off, having regard to the conditions and constraints of the site; and would not impact unacceptably upon the highway network or public transport capacity in the locality. This is verified by the various consultations received. Indeed, apart from English Heritage no objections have been raised against the scheme; including from local residents.

9.9 The development would be inclusive of an extensive and full package of s.106 obligations, considered reasonable to mitigate the otherwise unacceptable impacts of the development upon local infrastructure. The package has been negotiated having regard to the expectations set out in policy, to the details of the scheme and to the substantial planning/public benefits that the scheme would deliver. Each of the obligations has also been negotiated having regard to the statutory tests set out in the Community Infrastructure Levy Regulations 2010; namely they are considered: (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. These would also provide residual benefit for local residents/workers/visitors who will be able to benefit from the improvements.
9.10 In short, this is a sustainable development that would deliver substantial public benefit. The development would be in general compliance with the Development Plan for the Borough and there are no material considerations of sufficient weight that would dictate that the application should nevertheless be refused. Officers are therefore recommending approval of the scheme in accordance with the presumption in favour of sustainable development conferred upon Local Planning Authorities by the National Planning Policy Framework (NPPF).

10 Recommendation

10.1 Resolve to grant planning permission, subject to the conditions (to be provided by second despatch) and to the satisfactory completion of a s.106 agreement (heads of terms set out at section 7.13); and subject to referral to the Mayor under Article 5 of the Town and Country Planning (Mayor of London) Order 2008 and to the SoS under the requirements of the Town and Country Planning (Consultation) (England) Direction 2009.

11 Summary of the Reasons

11.1 In deciding to grant planning permission, 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 should be granted subject to the conditions listed below. In reaching this decision the following policies were relevant:

11.2 London Plan (2011) Policies:
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); 3.8 (Housing Choice); 3.9 (Mixed and Balanced Communities); 3.16 (Protection and enhancement of social infrastructure); 3.18 (Education Facilities); 4.1 (Developing London’s economy); 4.2 (Offices); 4.3 (Mixed use development and offices); 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 (Decentralised energy in development proposals); 5.7 (Renewable energy); 5.8 (Innovative energy technologies); 5.11 (Green Roofs); 5.12 (Flood risk management); 5.13 (Sustainable drainage); 5.15 (Water use and supplies); 5.18 (Construction, excavation and demolition waste); 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); 6.5 (Funding Crossrail and other strategically important transport infrastructure); 6.9 (Cycling); 6.10 (Walking); 6.13 (Parking); 7.2 (An inclusive environment); 7.3 (Designing out crime); 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); 7.15 (Reducing noise and enhancing
soundscapes); 8.2 (Planning obligations); and 8.3 (Community infrastructure levy).

11.3 Council’s Core Strategy (2011):
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 S8 (Sustainable Waste Management); Policy S9 (Quality of the Built Environment); Policy S10 (Planning Obligations); and Policy PN1 (Waterloo).

7 (Protection of Residential Amenity); 9 (Transport Impact); 14 (Parking and Traffic Restraint); 19 (Active Frontage Uses); 21 (Location and Loss of Offices); 24 (Use of Railway Arches); 26 (Community Facilities); 27 (Loss of Public Houses); 29 (The Evening and Late Night Economy, Food and Drink and Amusement Centre Uses); 31 (Streets, Character and Layout); 32 Community Safety/Designing Out Crime); 33 (Building Scale and Design); 35 (Sustainable Design and Construction); 38 (Design in Existing Residential/Mixed Use Areas); 39 (Streetscape, Landscape and Public Realm Design); 40 (Tall Buildings); 41 (Views); 43 (The River Thames Policy Area – Urban Design); 45 (Listed Buildings); 47 (Conservation Areas); 50 (Open Space and Sports Facilities); and MDO 98 (York House, 199 Westminster Bridge Road and Beckett House, Lambeth Palace Road – Area 1.8Ha).

11.5 The application is EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The environmental information presented in the Environmental Statement has been taken into consideration in reaching this decision.

12 Conditions and Informatives

12.1 Given the unforeseen closure of the Council’s planning offices due to a helicopter crash at Vauxhall, officers have not been able to finalise the list of conditions and informatives in advance of release of this Committee report. In these circumstances the conditions and informatives will follow by second despatch.