

**17 Newport Street – The Beacon**

in the London Borough of Lambeth

planning application no. 15/06029/FUL

**Strategic planning application stage 1 referral**

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

**The proposal**

Demolition of the existing building and erection of a fifteen storey building, plus basement, providing 12 flats (4x 1bed; 7x 2bed; and 1x 3bed), together with public realm improvements to Newport Street.

**The applicant**

The applicant is **Newport Street Projects**, the agent is **Bilfinger GVA**, and the architect is **All Design**.

**Strategic issues**

The proposed development is supported in strategic planning terms; however issues with respect to **affordable housing, urban design, tall buildings, climate change** and **transport** should be addressed before the application is referred back to the Mayor at his decision making stage. London Plan policies on **housing, strategic views, World Heritage Sites, historic environment** and **inclusive design** are also relevant.

**Recommendation**

That Lambeth Council be advised that the application does not yet comply with the London Plan, for the reasons set out in paragraph 54 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

**Context**

1 On 30 November 2015, the Mayor of London received documents from Lambeth Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has until 8 January 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1C(c) of the Schedule to the 2008 Order:

- 1C(c) “Development which comprises or includes the erection of a building that is more than 30 metres high and is outside the City of London.”

3 Once Lambeth Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London’s statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

5 The 0.01 hectare (100 sq.m.) site is triangular-shaped and currently occupied by a five storey building containing five residential units. Newport Street is to the west of the site, running alongside the railway viaduct, with the railway arches in various types of commercial use, many car-related, although this includes the London Contemporary School of Music. To the north of the site is a gated car park serving a two-storey office building. Further to the north on Newport Street are Grade II listed former warehouse buildings, recently converted for use as the Damian Hirst art gallery. Further south on Newport Street is the Beaconsfield Gallery. To the south of the site is Ravent Road, providing vehicular access to two car parks serving residential properties on Newport Street and Lambeth Walk. The areas to the east and the south are made up of three and four storey residential blocks.

6 The site is located just outside a number of planning area designations, including the Vauxhall Nine Elms Battersea Opportunity Area, the Central Activities Zone, the Thames Policy Area, Lambeth’s Key Industrial and Business Area, and Lambeth’s Vauxhall SPD area.

7 The nearest section of the Transport for London Road Network (TLRN) is the A3036 Albert Embankment, which is 250 metres west of the site. The nearest section of the Strategic Road Network (SRN) is the A3203 Lambeth Road, approximately 370 metres to the north. The site is located approximately 800 metres to the south of Lambeth North London Underground (LU) station and 800 metres to the north of Vauxhall LU and Overground Stations, which provides services to London Waterloo amongst other destinations. The nearest bus stop is located approximately 200 metres to the south-east, on Black Prince Road, providing access to bus route 360. There are also bus stops approximately 400 metres to the north, on the A3203 Lambeth Road, which serve bus route 344. The site has a public transport accessibility level (PTAL) of 2 (on a scale of 1 to 6b where 6b is the most accessible); however the site is within 50 metres of a 6a PTAL location.

## Details of the proposal

8 The proposal is to redevelop the site to provide a fifteen storey building, including twelve residential units. The ground floor residential lobby is planned to be used as exhibition space for local artists and the first floor provides external amenity space for residents. The floor plates increase in size up to the tenth storey, then reduce up to the fifteenth storey, meaning that the building tapers outwards then inwards on the Newport Street and Ravent Road elevations. The building is set back from the site boundary on the Newport Street and Ravent Road elevations, providing an area of publically accessible space at ground floor level. As part of the wider development proposals, the applicant has stated a commitment to improve the public realm in the area surrounding the building. This includes the hardstanding surrounding the building footprint and the public highway/vehicular access onto land owned by Watmos Housing Association. Details of these alterations are indicative at this stage, however they include lighting and new paving materials.

## Case history

9 On 5 August 2014, a pre-application meeting was held at City Hall for full planning permission for the redevelopment of the site to provide a mixed use fifteen storey building, including nine residential units, a gallery/cafe space at ground floor level, and artist studios at first and second floor level. The GLA's pre-application advice report of 4 September 2014 concluded that the principle of residential-led development at this site is supported in strategic planning terms; however issues with respect to housing, urban design, strategic views, historic environment, inclusive design, climate change and transport should be fully addressed prior to the submission of any future planning application.

## Strategic planning issues and relevant policies and guidance

10 The relevant issues and corresponding policies are as follows:

- |                        |  |
|------------------------|--|
| • Housing              | <i>London Plan; Housing SPG; Draft Interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG</i> |
| • Affordable housing   | <i>London Plan; Housing SPG; Draft Interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy</i>  |
| • Density              | <i>London Plan; Housing SPG; Draft Interim Housing SPG</i>   |
| • Urban design         | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG</i>   |
| • Tall buildings/views | <i>London Plan, London View Management Framework SPG</i>   |
| • Historic Environment | <i>London Plan; World Heritage Sites SPG</i>   |
| • Inclusive design     | <i>London Plan; Accessible London: achieving an inclusive environment SPG</i>  |
| • Climate change       | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy</i>   |
| • Transport            | <i>London Plan; the Mayor's Transport Strategy</i>   |
| • Parking              | <i>London Plan; the Mayor's Transport Strategy</i>   |
| • Crossrail            | <i>London Plan; Mayoral Community Infrastructure Levy; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG</i>   |

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Lambeth Local Plan 2015 and the 2015 London Plan (Consolidated with Alterations since 2011).

12 The following are also relevant material considerations:

- The National Planning Policy Framework and accompanying Planning Practice Guidance.
- The 2015 draft Minor Alterations to the London Plan.

## Principle of development

13 The proposal will provide twelve residential units, compared to five currently on the site. London Plan Policy 3.3 'Increasing Housing Supply' recognises the pressing need for more homes in London and sets an annual target for Lambeth of 1,559 new homes per year between

2015 and 2025. The redevelopment of the site for residential-led mixed use purposes would contribute to London Plan housing targets and is supported in principle.

## Housing

14 The proposal includes twelve residential units, as follows:

One bed	4
Two bed	7
Three bed	1
<b>Total</b>	<b>12</b>

15 It is understood that the market units will be private rented sector (PRS) tenure, which is supported by London Plan Policy 3.8 'Housing Choice'. The Draft Interim Housing SPG recognises that PRS schemes are beneficial in a number of ways, having the potential to accelerate delivery; offer longer term tenancies and more certainty over long term availability; and can ensure high quality management through single ownership. Such schemes are strongly encouraged to sign up to the London rental standard. Paragraph 3.1.24 of the Draft Interim Housing SPG states that PRS should be subject to *"a covenant of, for example 15 years, which ensures the units will stay as private rent for at least this period (overall ownership may change over this period but the units must be retained by a single owner)"* and the Council should consider the need for this within the section 106 agreement.

### Affordable housing

16 London Plan Policy 3.9 'Mixed and Balanced Communities' seeks to promote mixed and balanced communities by tenure and household income and Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing. Policy 3.13 'Affordable Housing Thresholds' states that affordable housing requirements should be applied to sites that have the capacity to deliver ten or more units and that the capacity of sites should be assessed on the basis of Policy 3.4 'Optimising Housing Potential'.

17 In response to Policy 3.12, the applicant has undertaken a financial appraisal for the site, which finds that it is not possible to provide any affordable housing. However, the applicant considers it appropriate to offer a contribution of £100,000 towards affordable housing in off-site locations, which it states will aid the Council's targets in delivering affordable housing in more appropriate developments. Policy 3.12 states that affordable housing should normally be provided on-site, off-site in exceptional circumstances, and a cash-in-lieu contribution only where this would have demonstrable benefits in furthering the affordable housing and other policies in the London Plan. Subject to the outcome of an independent review of the applicant's viability assessment, in recognition of the difficulty of incorporating affordable housing on this very small and constrained site, PRS tenure, and the small number of units, a payment-in-lieu may be acceptable in this instance. The Council's independent review of the applicant's viability review should be shared with GLA officers in due course. Given the relatively high residential rental values in this area, GLA officers consider the off-site contribution to be very modest. Consequently, the assumptions made in the viability assessment will require careful scrutiny.

18 The Council should also consider the need for a clawback mechanism, in line with paragraph 3.1.24 of the Draft Interim Housing SPG which states:

- *"If viability testing of covenanted schemes demonstrates that affordable housing contributions at the level supported by private sale are unviable because of the distinct*

*economics of PRS, 'claw back' mechanisms should be included as part of the planning permission to recoup a contribution for affordable housing if homes are sold out of the long term PRS market. The claw back agreement could base the contribution amount on the level of affordable housing that would have been viable on the scheme if it was for traditional market sale or be based on an agreed proportion of the sale price of each property when it is sold. To encourage long term institutional investment, this claw back requirement could proportionately reduce over time and be waived for schemes that are kept in the PRS market for the longer term."*

### Density

19 London Plan Policy 3.4 'Optimising Housing Potential' states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output within the relevant density range shown in Table 3.2. The site is considered to be within an 'urban' setting, where the density matrix sets a guideline of 200-450 habitable rooms per hectare with a PTAL of 2-3, although in reflection of the changing nature of this area it could be argued that the site is within a 'central' setting, which has a range of 300-650 habitable rooms per hectare. The applicant calculates the density to be 3,100 habitable rooms per hectare, and although this is considerably above the density range, this is to be expected where a tall building is proposed on a very small site, and the proposal will only provide a net increase of seven units. The density is therefore considered acceptable in this case.

### Residential quality

20 London Plan Policy 3.5 'Quality and Design of Housing Developments' promotes quality in new housing provision, including space standards, with further guidance provided by the Mayor's draft interim Housing SPG.

21 The quality of the residential units is considered to be good, generally exceeding the London Plan space standards, although not excessively so. All units are dual aspect and have an external amenity space of between 5 and 9 sq.m. in the form of a balcony or terrace. A residents' communal amenity space of 74 sq.m. is also provided at first floor level.

### Children's play space

22 London Plan Policy 3.6 'Children and Young People's Play and Informal Recreation Facilities' seeks to ensure that development proposals include suitable provision for play and recreation. The child yield of the proposals will be very small in reflection of the small number of units provided; however the applicant proposes to include an element of playspace within the first floor communal amenity space, which is welcomed.

## **Urban design and tall buildings**

23 The application presents the proposals in the context of the regeneration of Newport Street, based on the emerging cultural and artistic focus of the street. A 43 sq.m. (38% of the site footprint) public outdoor seating area, with benches and artwork will contribute to this and the applicant proposes to enhance the surrounding area by resurfacing the existing pavements, and creating a new pavement beside the site where none currently exists and planting trees. The proposal to exhibit local artists work in the ground floor residential lobby is welcomed as it will provide some contribution to the developing artistic focus of Newport Street, as well as a level of activity. A more formal gallery space was discussed at pre-application stage, although it is recognised that the very small floorplate of the ground floor does not allow this.

24 The design of the proposed development accommodates twelve flats in a fifteen storey tower on a small triangular site. The height of the building is significantly taller than surrounding buildings; however, given the changing context of taller buildings across the railway line, this does not present a significant concern in urban design terms. Given the developing artistic focus of Newport Street, a tall and distinctive building in this location could become a useful landmark. Notwithstanding this, for such a prominent and tall building to be acceptable, its design must be of an outstanding quality.

25 The appearance of the building is unconventional, described by the architect as organic in shape, with *"a thin stem which then bursts out to form a bulbous belly"*. The building includes porthole windows of varying sizes, with reveals painted yellow, and facades of sprayed concrete with a *"sparkling glitter"* effect. This has the potential to create a distinctive feature in the area; however for this to be successful it is critical that the building weathers well and can be easily maintained. Further information on this should be provided, including external window cleaning, and measures to combat weather related staining. In any case, the Council should secure detailed design, including on-site material samples, by condition.

## **Strategic views, World Heritage Site and Historic environment**

### Strategic views

26 In accordance with London Plan Policies 7.8 'Heritage Assets and Archaeology', 7.12 'Implementing the London View Management Framework' and supplementary planning guidance 'London View Management Framework' (LVMF SPG), a Townscape and Visual Impact Assessment (TVIA) and Heritage Statement have been provided with the application, which examines three strategic viewpoints and a further nine viewpoints.

27 The TVIA includes LVMF SPG Assessment Points 18A.2 and 18A.3 for the River Prospect from Westminster Bridge (TVIA Viewpoints 11 and 1). The LVMF SPG description of the view highlights the importance of Lambeth Palace; states that the Victorian turrets of St. Thomas's Hospital can be clearly seen against the sky; and describes the mature trees along Albert Embankment as forming important middle ground elements. The LVMF Visual Management Guidance states that *"the opportunity presented by any new development on the south side of the river in front of Lambeth Bridge to improve the quality of the view would need to be assessed against its impact on Lambeth Palace, the Victorian turrets of St. Thomas's Hospital as well as on the Outstanding Universal Value of the World Heritage Site"*.

28 The TVIA shows that from Assessment Point 18A.2 (TVIA Viewpoint 11) at the centre of Westminster Bridge, the building would be hidden behind one of the Grade II listed Victorian blocks of St. Thomas's Hospital and would therefore have no impact. From Assessment Point 18A.3 (TVIA Viewpoint 1), nearer to the Westminster bank, the top of the building would appear behind the trees surrounding the northern part of the Grade I listed Lambeth Palace, although this part of Lambeth Palace is almost completely obscured by trees and the building would be much less prominent than existing buildings nearer to the river, including the Parliament View building to its right. Although not strictly speaking *"in front"* of Lambeth Bridge as defined by the LVMF, its impact on Lambeth Palace, St. Thomas's Hospital, and the World Heritage Site is, in any case, considered negligible from Assessment Point 18A.3.

29 The proposed building will sit in the background of the Protected Vista from Assessment Point 4A.2 (TVIA Viewpoint 12) from Primrose Hill to the Palace of Westminster, a Landmark Viewing Corridor, as identified in the LVMF SPG. Policy 7.12 'Implementing the London View Management Framework' states that development that exceeds the threshold height of a

Landmark Viewing Corridor should be refused. The maximum height of the proposed building (52.8 metres AOD) is above that of the 43.5 metre threshold plane; however the TVIA demonstrates that it would be screened by existing buildings within central London, to the north of the Palace of Westminster, including the existing 164-182 Oxford Street, which is Grade II listed and therefore unlikely to be demolished. Although the proposal technically breaches the threshold height of the Protected Vista, which is contrary to Policy 7.12, GLA officers consider that there would be no visible impact on the Protected Vista and would not have any detrimental impact on the ability of viewers to appreciate the Palace of Westminster.

### World Heritage Site

30 London Plan Policy 7.10 'World Heritage Sites' (WHS) and supplementary planning guidance on 'London's World Heritage Sites – Guidance on Settings' (WHS SPG) seeks to ensure that development does not cause adverse impacts to World Heritage Sites or their settings. The Westminster World Heritage Site Management Plan (2007) notes that *"views from the WHS and adjacent riverside embankments to Lambeth are dominated by the tree-lined Embankment and three particular and distinctly individual buildings: County Hall, the complex forming the St. Thomas' Hospital site and Lambeth Palace"*. Although no specific guidance is given in the Management Plan on development within this view, it does state that *"development beyond the WHS boundary of a large scale may pose risks to this key element of the Outstanding Universal Value"*.

31 The applicant's Heritage Statement contains an assessment of the impact on the Westminster WHS, based on TVIA Viewpoints 1, 2, 11 and 12. The proposed building would only be visible from LVMF Assessment Point 18A.3 (TVIA Viewpoint 1), and as discussed above the impact is considered negligible.

### Historic environment

32 London Plan Policy 7.8 'Heritage Assets and Archaeology' states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should *"have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"* and in relation to conservation areas, special attention must be paid to *"the desirability of preserving or enhancing the character or appearance of that area"*.

33 The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Recent judgements have provided detailed consideration of the duty imposed on local planning authorities. The Court of Appeal in *Barnwell Manor* held that a finding of harm to a listed building or its setting is a consideration to which the decision-maker must give considerable weight, and that there should be a strong presumption against granting permission that would harm the character or appearance of a conservation area. The NPPF

states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, and a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.

34 The Heritage Statement includes an assessment of the impact of the proposals on the Westminster World Heritage Site (as discussed above); the Grade I listed Lambeth Palace; five other listed buildings; three Conservation Areas; and two locally listed buildings. Although the proposed building would be visible from some of these heritage assets and would therefore affect their setting, none are in close proximity and GLA officers do not consider that any harm will be caused to their significance or setting.

## **Inclusive design**

35 London Plan Policy 3.8 'Housing Choice' requires all new housing to be built to 'Lifetime Homes' standards. In order to bring the London Plan into line with new national housing standards, the draft Minor Alterations to the London Plan proposes to replace this with "ninety percent of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings'". Policy 3.8 also requires 10% of units to be wheelchair accessible or easily adaptable, which the draft Minor Alterations to the London Plan proposes to replace this with "ten per cent of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users". In advance of the MALP, a Housing Standards Policy Transition Statement sets out how the existing housing standards should be applied from October 2015. This is also set out in the draft interim Housing SPG, alongside the other London standards which are not affected by the introduction of national standards.

36 The application states that units will meet Lifetime Homes requirements the 10% (two units) will be wheelchair accessible. The Council should secure M4(2) and M4(3) requirements by condition, including the submission of a plan to identify which units will be 'wheelchair user dwellings', prior to commencement, to ensure the design of a scheme has considered the standard.

## **Climate change**

### Energy

37 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting, mechanical ventilation with heat recovery and variable speed drives. The demand for cooling will be minimised through openable windows, internal blinds and exposed thermal mass, while the penthouse will be provided with active cooling. The applicant has stated that the dwellings all pass the Part L overheating criterion; however this is not considered sufficient to comply with London Plan Policy 5.9 'Overheating and Cooling'. The risk of high temperatures in summer should be limited to 'slight' or less and dynamic overheating modelling should be carried out in line with CIBSE TM52 and TM49 to demonstrate that overheating risk has been addressed in line with Policy 5.9.

38 The development is estimated to achieve a reduction of 3.7 tonnes per annum (23%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development from the first step of the energy hierarchy ('Be Lean'). The savings appear high and evidence should



be provided in the form of sample DER and TER worksheets, including efficiency measures alone.

39 The applicant has identified that the proposed Vauxhall Nine Elms and Battersea (VNEB) district heating network is within the vicinity of the development. Connection to the network should be prioritised and evidence of correspondence with the network operator should be provided to demonstrate that opportunities for connection are being fully investigated. The information should include details of when a connection is likely to be possible. The applicant has provided a commitment to ensure that the development is designed to allow future connection to a district heating network should one become available. The applicant has also confirmed that all apartments will be connected to the site heat network. The site heat network will be supplied from a single energy centre and details of the floor area and location should be provided.

40 The applicant has investigated the feasibility of combined heat and power (CHP); however, due to the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

41 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 12 sq.m. of solar PV on the roof of the building, which will be connected directly to the penthouse. A roof plan showing the proposed installation location has been provided. The specification of high efficiency PV should be considered to maximise opportunities for carbon savings. A reduction in regulated CO<sub>2</sub> emissions of 0.7 tonnes per annum (4%) will be achieved through this third element of the energy hierarchy ('Be Green').

42 The applicant has stated that the use of a ground source heat pump will be considered to provide cooling to the penthouse. If this option is being considered, further information should be provided on the likely carbon savings achieved, and confirmation that the system will not interfere with ensuring that the development is suitable for district heating retrofit.

43 Based on the energy assessment submitted, a reduction of 4.4 tonnes of CO<sub>2</sub> per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 27.6%. This falls short of the target within Policy 5.2 'Minimising Carbon Dioxide Emissions' of the London Plan. The applicant should address the comments above and consider the scope for additional measures aimed at achieving further carbon reductions. If it is demonstrated that there is no further potential for carbon dioxide reductions onsite, in liaison with the Council, the developer should ensure the shortfall in carbon dioxide reductions is met off-site.

#### Climate change adaptation

44 The applicant's Flood Risk Assessment (FRA) acknowledges that the site is within the flood defence breach zone and would be flooded to a depth of 0.7 metres in the event of a breach during a 1 in 200 year tidal event. The FRA also confirms that Environment Agency (EA) mapping suggests the site is at risk of significant surface water flooding, as is much of the adjacent Newport Street, although the site is on relatively higher ground. The FRA suggests measures such as waterproof doors for all external entrances into the ground floor of the building; waterproof by design access to the basement; registration with the EA's Flood Warning system; and a Flood Management Plan. These measures should be secured by an appropriate planning condition, in order for the proposals to be acceptable in terms of London Plan Policy 5.12 'Flood Risk Management'.

## Transport

45 The site currently provides no car parking spaces, and the proposal is also car-free, which is welcomed; however it is suggested that one Blue Badge parking space is provided. The commitment to restricting residents from applying for parking permits in the local controlled parking zone (CPZ) is welcomed, and this should be secured through the section 106 agreement.

46 The application proposes 20 cycle parking spaces, which is in line with London Plan standards. These should be located in a secure, sheltered and accessible location, as outlined in Chapter 8 of the London Cycle Design Standards. For further guidance, please refer to: <http://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf>

47 The provision of multi-modal trip generation surveys is welcomed. Due to the relatively low number of residential units, it is unlikely that the development will have a significant impact on public transport capacity.

48 The applicant should consider the preparation of a travel plan, in accordance with TfL's Travel Plan Guidance, which should include free Oyster Cards, Cycle Hire vouchers and free car club memberships for all residents. The final version of the travel plan should be secured, enforced, monitored and reviewed as part of the section 106 agreement, in accordance with London Plan Policy 6.3.

49 A construction logistics plan (CLP) and delivery and servicing plan (DSP) should be submitted and secured by condition, in line with TfL's guidance. Guidance on the methodology and further information regarding construction routing has been provided to the Council. Maintaining cycle safety during construction and ensuring construction vehicles avoid key strategic routes and peak hour movements is essential.

### Community Infrastructure Levy (CIL)

50 In accordance with London Plan Policy 8.3, 'Community Infrastructure Levy', the proposed development is within the London Borough of Lambeth, where the Mayoral CIL charge is £35 per square metre Gross Internal Area (GIA).

## Local planning authority's position

51 Lambeth Council's position is not yet known.

## Legal considerations

52 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## Financial considerations

53 There are no financial considerations at this stage.

## Conclusion

54 London Plan policies on housing, affordable housing, urban design, tall buildings, strategic views, World Heritage Sites, historic environment, inclusive design, climate change and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Housing and affordable housing:** The Council should consider the need for a covenant and a clawback mechanism in the section 106 agreement and share the outcome of the Council's independent review of the applicant's viability assessment. Given the relatively high residential rental values in this area, GLA officers consider the off-site contribution to be very modest, and consequently, the assumptions made in the viability assessment will require careful scrutiny. Density, residential quality and play space are acceptable.
- **Urban design and tall buildings:** The unconventional design of the building has the potential to create a distinctive feature in the area; however further information should be provided on external window cleaning and measures to combat weather related staining. The Council should secure detailed design, including on-site material samples, by condition.
- **Strategic views, World Heritage Sites, and Historic environment:** The impact of the building on strategic views and the World Heritage Site would be minimal or non-existent and would not have any detrimental impact on the ability of viewers to appreciate the Palace of Westminster. No harm will be caused to heritage assets.
- **Inclusive design:** The Council should secure M4(2) and M4(3) requirements by condition.
- **Climate change:** Dynamic overheating modelling should be carried out to demonstrate that overheating risk has been addressed. Further information should be provided including DER and TER worksheets; evidence of correspondence with the Vauxhall Nine Elms and Battersea district heating network; floor area and location of the energy centre; and the carbon savings of the ground source heat pump. If it is demonstrated that there is no further potential for carbon dioxide reductions onsite, in liaison with the Council, the developer should ensure the shortfall in carbon dioxide reductions is met off-site.
- **Transport:** The transport provisions are acceptable; however it is suggested that one Blue Badge parking space is provided; controlled parking zone restrictions should be secured through the section 106 agreement; the cycle parking spaces should be located in a secure, sheltered and accessible location; the final version of the travel plan should be secured, enforced, monitored and reviewed as part of the section 106 agreement; and a construction logistics plan and delivery and servicing plan should be submitted and secured by condition.

55 On balance, the application does not yet comply with the London Plan, for the reasons set out above; however the possible remedies set out above could address these deficiencies.

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for further information, contact GLA Planning Unit (Development & Projects Team):

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