PLANNING STATEMENT
8 Albert Embankment Planning Statement

U and I (8AE) Ltd and London Fire Commissioner
29 March 2019
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Executive Summary

U+I’s vision is to create long-lasting social and economic change for the communities in which they build. With over a £9.5bn portfolio of complex, mixed-use, community focused regeneration projects, including a £146m investment portfolio, U+I unlocks complicated urban sites bristling with potential in London, Manchester and Dublin.

U+I has significant experience in Public Private Partnership projects (PPP), including:

- Clapham One, which delivered a new library, health centre and leisure centre for Clapham in partnership with Lambeth Council. The project was awarded best mixed-use development at the 2011 International Property Awards as well as 11 other awards for its architecture, housing design and the quality of its facilities;
- The Deptford Project, which rejuvenated Deptford High Street in partnership with Lewisham Council. The project won ‘Best Heritage Led Project’ at the 2017 London Planning Awards and the Placemaking Award at the 2017 Property Week Awards.

Through this PPP with LFC (London Fire Commissioner) the proposed development at 8 Albert Embankment will both deliver a new fire station and mixed-use regeneration that breathes new life into this largely underutilised site and creates a new landmark destination for London in Lambeth, creating new homes, a wide range of employment opportunities including affordable workspaces and a London Fire Brigade (LFB) Museum, all set within high quality public realm.

The fire station is in a strategically important location within central London, providing a critical role in the response provided by LFB within Lambeth but also in Whitehall, Victoria and the Government Security Zone (Westminster Area). Nevertheless, the fire station is in urgent need of significant modernisation to provide upgraded facilities that meet the LFB Standard Station Design Brief.

The proposals will deliver significant benefits to the local area in terms of job creation as well as the tourism and educational benefits of a LFB Museum. The project also involves substantial repair and conservation works to the listed fire station in accord with the heritage regeneration aims of the Council, Historic England and LFB.

The clear benefits of redevelopment and provision of new fire service facilities are evident across London, where the fire brigade has already undertaken such work with other developers over the last ten years, including U+I, who were partners in the mixed-use redevelopment of Millwall Fire Station. That redevelopment represented the first privately funded fire station in the UK at zero cost to the public purse, alongside 178 homes (including affordable).

The proposed development addresses the shortcomings of an earlier Appeal Scheme (2013) which, whilst found to be acceptable in terms of principle and mix of uses by the Appeal Inspector, was dismissed solely on daylight and sunlight impacts.

Allocated for mixed use development (Policy PN2 Site 10) and partially located within a locally-defined Key Industrial and Business Area (KIBA), the proposals have been subject to rigorous testing in order to provide varied employment opportunities, maximise the benefits of the scheme and demonstrate exceptional circumstances justifying residential within the KIBA boundary. This testing demonstrates the exceptional circumstances (as referred to in Policy PN2 Site 10), concluding that a mixed-use approach blending residential and employment on all three sites delivers more varied job opportunities, more housing, an enhanced public realm and significant heritage benefits when compared with an alternative scheme for employment only within the KIBA.

The proposal is the product of extensive pre-application engagement with LB Lambeth, the GLA and Historic England, as well as continued exhibitions, dialogue and discussions with local stakeholders and the wider
community and aims to deliver on LFB’s objectives of retaining part of the listed building in its original use to provide a modern fire station that meets the 21st century operational requirements of LFB.

The proposed scheme will be a truly mixed-use development, comprising 417 new homes including 146 affordable homes (35% affordable by unit and 34% affordable by habitable rooms) alongside over 24,000 sqm (GIA) of non-residential floorspace. The non-residential floorspace comprises:

- 2,203 sqm new fire station for LFB (sui generis);
- 1,434 sqm London Fire Brigade Museum (Use Class D1);
- a hotel of up to 200 bedrooms, 6,270 sqm (Use Class C1) including a 56 sqm flexible retail or hotel space (Use Classes A1/A2/A3/A4/C1);
- 10,809sqm of new office and workspace floorspace, including:
  - 9,123 sqm of corporate office floorspace (Use Class B1(a));
  - 1,348 sqm of medium workspace floorspace (Use Classes B1(a) / B1(b) / B1(c));
  - 186 sqm of small workspace floorspace (Use Classes B1(a) / B1(b) / B1(c));
  - 142 sqm of micro workspace floorspace (Use Classes B1(a) / B1(b) / B1(c));
  - 455 sqm flexible retail floorspace (Use Classes A1/A2/A3/A4);
  - 173 sqm flexible commercial unit (Use Classes A1/A2/A3/A4/B1(a)/B1(b)/B1(c)/D1/D2);
  - a gym of up to 2,053 sqm (GIA) gym (Use Class D2); and
  - a 865 sqm restaurant (Use Class A3);
- together with associated areas of new public realm, hard and soft landscaping, basement and surface parking, servicing, means of access and plant and equipment.

The wide-range of employment spaces will create diverse employment opportunities for micro, medium and small sized enterprises (MSME), with the flexible commercial space assisting to stimulate collaboration and innovation.

The wide-ranging benefits of the scheme include:

**Heritage**

- Restoration of two underused listed buildings, including partial re-use for their original purposes, preserving the significance of the building in terms of its historic use and association and securing the buildings long term future; enhancing their setting along Lambeth High Street;
- Substantial improvements to the setting of the adjoining Grade II listed former Royal Doulton factory through demolition of the CMC building and thus making it visible from the Albert Embankment;
- Incorporation of the re-provided obelisk within the public realm and the provision of other public art;

**Emergency services and museum**

- Creation of a new modern ‘fit for purpose’ firefighting and emergency services base for central London in a strategic location to achieve fast response times to emergency incidents;
- Combination of the fire station with a LFB Museum that jointly facilitate improved LFB education and engagement with the local community, all at its original location;

**New homes and jobs**

- Re-use of a largely-vacant brownfield building and land in central London;
• Delivery of much-needed new housing, including 35% affordable housing by unit (34% by habitable room);
• Supporting employment for around 1,250 people on-site across a range of sectors;
• Creating a diverse range of flexible office spaces (including low cost and affordable flexible workspace) and opportunities for large office occupiers, MSMEs and start-ups to grow;
• Creating additional jobs during construction and from associated resident and occupier expenditure.

Placemaking

• Revitalising the local area through the introduction of active uses;
• Adding to and spreading tourism and leisure infrastructure along the riverfront in central London through the provision of a new hotel and the re-instated LFB Museum;
• Creation of a rooftop restaurant offering public access to substantial river views;
• Creation of an active placemaking destination between Vauxhall and Waterloo;
• Adding to public high-level accessibility along the River Thames;
• Transformation of the pedestrian environment through enhanced wayfinding and creation of over 1,900 sqm of new public realm, representing 18% of the application site area;
• Creation of a range of play spaces for children aged under 5 years, including natural play interventions and play-on-the way provision within the public realm;
• Provision of an active use on Newport Street, complementing its growth as a destination for arts and cultural uses; and
• Financial contributions towards the delivery of local infrastructure via the Community Infrastructure Levy (CIL) and s106 contributions, including contributions towards older children’s play space and public realm improvements.

Overall, the proposed development will secure the long overdue regeneration and revitalisation of an important site as identified within the London Plan, Lambeth Local Plan, Vauxhall, Nine Elms and Battersea (VNEB) OAPF and Vauxhall SPG. It will realise LFB’s objective of providing a modern fire station and new LFB Museum, supporting the local area as a growing destination for arts and culture, whilst also sustaining and enhancing heritage assets and safeguarding their long-term future.

The proposals embrace the design and placemaking principles set out in planning policy and guidance and will knit together the areas of Lambeth Gateway and Central Embankment and provide a dynamic and lively new urban quarter, revitalised heritage assets and public realm in the process.
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1.0 **Introduction**

1.1 This Planning Statement has been prepared by Lichfields on behalf of our client, U and I (8AE) Limited (U+I) and the London Fire Commissioner (LFC) to accompany a joint application for full planning permission and an application for Listed Building Consent for the redevelopment of 8 Albert Embankment, No. 26 Lambeth High Street (The Workshop) and land to the rear on the junction between Black Prince Road and Newport Street. For the purposes of this report, the LFC will be referred to as LFB (London Fire Brigade).

1.2 The site is owned by LFB, which continues to operate from a portion of the Grade II listed building that fronts Albert Embankment. The organisation’s central administrative function has already been relocated but an important operational fire station remains.

1.3 The site is located within the London Plan VNEB Opportunity Area and is allocated for redevelopment in the Lambeth Local Plan (Policy PN2 Site 10).

1.4 The site was the subject of two previous planning applications (ref. 10/00318/FUL and 10/04473/FUL) and accompanying applications for Listed Building Consent and Conservation Area Consent submitted in 2010 by Albert Embankment LLP (a development company of Native Land Limited) and LFB.

1.5 The first application (ref. 10/00318/FUL) was withdrawn and the subsequent application (10/4473/FUL) was refused. An appeal (the ‘Appeal Scheme’ ref. APP/N5660/A/12/2180815) was lodged and, whilst the principle and mix of uses was accepted by the Inspector, the appeal was dismissed in May 2013 solely on daylight and sunlight effects finding the scheme compliant in all other material respects.

1.6 The now-proposed development therefore reflects both the conclusions of the appeal dismissal and the site’s re-confirmed allocation in the adopted Lambeth Local Plan.

1.7 A central objective of the proposal is to deliver the swift restoration of the listed building, to provide a new modern, ‘fit for purpose’ fire station that meets all of the 21st century operational requirements of LFB in its longstanding location. Alongside the fire station, a vibrant mix of residential, employment, retail and other uses are proposed, including a London Fire Brigade Museum. We refer you to the LFB Operations Statement for full detail on the need for the restoration of the fire station (Appendix 4).

1.8 The description of the proposed development is as follows:

“Phased mixed-use development including up to 417 residential units and comprising: part redevelopment and restoration, conversion and extension of former Fire Brigade Headquarters building and demolition of the existing extension and re-provision of obelisk to provide a new fire station (Sui Generis), a new London Fire Brigade museum (Class D1), residential units (Class C3), a ten storey hotel (Class C1) with up to 200 bedrooms and a flexible retail/lobby space (Classes A1/A2/A3/A4/C1), and a rooftop restaurant with ancillary bar (Class A3); demolition and redevelopment of the central workshop building to provide buildings of up to twenty-six storeys plus basements, comprising business floorspace (Use Class B1), a gym (Class D2), retail units (Classes A1/A2/A3/A4) and residential units (Class C3); development of land to the rear to provide a eleven storey building plus basement, comprising a flexible commercial unit (Classes A1/A2/A3/A4/D1/D2/B1) and residential units (Class C3): all together with associated areas of new public realm, hard and soft landscaping, basement and surface parking, servicing, means of access and plant and equipment.”
1.9 Associated with this application, a parallel application for the stopping up of necessary areas/portions (to a minor extent to allow for relevant wind mitigation) of immediately adjoining highways to support the development will be made under section 247 and 248 (as applicable) of the Town and Country Planning Act 1990.

1.10 The purpose of this Planning Statement is to bring together the necessary information to appraise the proposal against prevailing planning policy and other material considerations. It sets out our conclusions on the planning case for this development.

**Accompanying Documents**

1.11 The scope of the application has been discussed and agreed during the pre-application process with LB Lambeth (LBL), including via a Planning Performance Agreement and related regular meetings over the course of the last three years.

1.12 The detailed planning application and application for Listed Building Consent comprises the completed application forms and relevant certificates, along with an Environmental Statement (ES) which documents the environmental effects associated with the application proposals.

1.13 The ES considers whether development is likely to give rise to significant environmental effects and identifies, where necessary, mitigation and monitoring to address any significant adverse impacts. The detailed assessment of the various environmental issues undertaken within the ES is not repeated in this Planning Statement. This Statement, however, draws upon the conclusions of the ES to assist in the evaluation of the proposals against the prevailing town planning policy.

1.14 A suite of plans and documents are submitted to accompany the application in addition to this Planning Statement and provide information relevant to determining the application. These include the following:

1. Planning and listed building consent application form and certificates;
2. CIL Additional Information Requirements Form;
3. Application drawings, prepared by Pilbrow & Partners;
4. Application Cover Letter, prepared by Lichfields;
5. Financial Viability Assessment, prepared by JLL;
6. Design and Access Statement, prepared by Pilbrow & Partners;
7. Landscape and Public Realm Strategy, prepared by Townshend Landscape Architects;
8. Statement of Community Involvement, prepared by London Communications Agency;
9. Daylight, Sunlight & Overshadowing Report, prepared by Point2 Surveyors;
10. Environmental Statement (ES), including:
   a. Non-Technical Summary
   b. Volume I: Main Text and Figures:
      Chapter 1: Introduction
      Chapter 2: Approach to Assessment
      Chapter 3: Reasonable Alternatives and Design Evolution
      Chapter 4: Proposed Development
      Chapter 5: Demolition and Construction
      Chapter 6: Socio-Economics
For completeness, the application cover letter includes the schedule of application drawings and list of standalone appendices to Volume 1 of the ES.

**Report Structure**

This Statement comprises the following chapters:

- Chapter 2: Description of the site and surrounding area;
• Chapter 3: Background to the site and summary of planning history;
• Chapter 4: Details of the proposed development;
• Chapter 5: Planning and heritage balance;
• Chapter 6: A summary of the policy context;
• Chapter 7: An appraisal of the main policy issues relating to the proposal; and
• Chapter 8: Concluding comments.
2.0 Site and Surroundings

2.1 The site is located on the east side of Albert Embankment, at the junction with Black Prince Road. It is bound by Whitgift Street to the north, a railway and Newport Street to the east, Southbank House and Black Prince Road to the south and the Albert Embankment to the west.

2.2 The site covers an area of approximately 1.06 hectares and contains nearly 18,000sqm of existing floorspace. It is subdivided into three separate parcels of land by Lambeth High Street and the railway lines. The three parcels are referred to as the “West”, “Central” and “East” sites for the purposes of the application.

2.3 All three parcels of the site are located within the Albert Embankment Conservation Area.

Figure 2.1 Overview Plan

West Site

2.4 The West Site faces Albert Embankment and provides accommodation for the London Fire Brigade in a stepped nine to ten storey Grade II listed building. We understand that the building has been in Sui Generis use as a fire station with offices and sleeping accommodation above.

2.5 The listing description identifies the building as “… of special historic interest as the headquarters of the London Fire Brigade, the most important fire brigade nationally and the third largest in the world. The building was the centre of London’s fire-fighting operations in WWII.” The building was constructed in 1937 and since then has undergone several changes, which relate mainly to the internal layout of ground to third floors.
2.6 The listing continues to note that the building was elaborately designed with sculptures and with a memorial hall “to the memory of the officers and men of the LFB who throughout the years lay down their lives whilst doing their duty.”

2.7 The basement to second floors of the building are currently occupied by the Fire Brigade and still used as an operational fire station (Lambeth Fire Station). The other upper floors are largely unused.

2.8 Adjoining the Former Headquarters Building, in the south west corner of the site, is a three-storey extension to 8 Albert Embankment known as the Communications Mobilising Centre (CMC Building). The extension was constructed in the early 1980s and forms part of the listed fire station - although noted in the listing description as “not [being] of special interest.” The CMC Building was last used as a central computer control building (Sui Generis use).

2.9 To the north of the CMC Building is a hard-surfaced drill yard which is actively used by the fire brigade for parking, training and fire related operations. Whilst this yard had previously been opened to the general public and public invited for ceremonial occasions, the yard now remains secured solely for brigade purposes. Also, within the yard to the north is an Obelisk, which was built in 1940 as a ventilation shaft for the underground bunker intended to be used during WW2. Nevertheless, the Obelisk was never used for this purpose and remains unused.

2.10 To the east of the yard, and on the boundary between the West Site and Central Site, is a Grade II listed drill tower, which was also constructed in 1937. It is still used for training purposes by the fire brigade. It comprises a ten-storey structure with two window openings to each floor.

Figure 2.2 View of Former Headquarters from Millbank

Central Site

2.11 The Central Site is bound by Lambeth High Street to the west, by Whitgift Street to the north, by Southbank House to the south and by the railway viaduct to the east.
2.12 It comprises an area of parking that fronts onto Lambeth High Street, behind which is a two to four storey building (The Workshop). Whilst until recently the building was vacant, as part of U+I’s worthwhile use strategy for the site, it has since November 2016 been used as a temporary LFB Museum, event space and by a number of local charities, social and start up enterprises and artists (Use Class D1); it includes the Migration Museum and Institute of Imagination (planning permission refs. 16/03122/FUL and 17/05142/VOC). An application (ref. 18/04185/VOC) to extend the use of the temporary use of the building until 31 December 2019 was approved in December 2018. The previous use of The Workshop was also Sui Generis, and the use of the building will revert to this use on expiration of the approved temporary use.

2.13 Southbank House is located to the south of the site and outside the application boundary. It is a five storey Grade II listed building, formerly part of the Royal Doulton Factory but now used for offices.

2.14 Along the northern side of Whitgift Street are residential properties - Whitgift House (five storeys) and a modern flatted building at No.2 (six storeys). Beyond Whitgift Street are the Old Paradise Gardens. There are a number of commercial businesses that operate in the railway arches and a public house (The Windmill Pub) located close to the site on Lambeth High Street. Whilst Lambeth High Street is a high street by name, the pub is the only A Class use throughout its length.

2.15 Beyond Southbank House and to the south of the site and Black Prince Road is a dense area of new development and a series of taller buildings that stretch from Albert Embankment to Vauxhall and Battersea. Approved developments include buildings of up to 30 storeys between 20-29 Albert Embankment (see Appendix 1). Of note, No. 81 Black Prince Road (located immediately to the south of Southbank House) is up to 23 storeys.

Figure 2.3 Lambeth High Street at the junction of Whitgift Street, looking south

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**East Site**

2.16 The East Site is located at the junction of Black Prince Road and Newport Street. It previously provided surface level car parking associated with the fire station and is currently leased to
Vauxhall One and used as the Spring Gardens Nursery. It is bounded to the north by the former “Ragged School” at 22 Newport Street, currently used as the Beaconsfield Art Gallery. To the east is predominantly low-rise residential accommodation and to the south is a series of shops which forms Black Prince Road Local Centre.

**Surrounding Area**

2.17 The surrounding area has been subject to significant continuing change and regeneration in recent years; please refer Chapter 1 of the Design and Access Statement and Appendix 1 of this Planning Statement for a summary of recent planning applications in close proximity to the application site.

2.18 Of note, Newport Street in particular has become more established as an arts destination through the opening of Damien Hirst’s Sterling Prizewinning Newport Street Gallery and through the presence of the Beaconsfield Gallery.

2.19 On the opposite side of the River Thames, to the west, is Tate Britain (Grade II* listed), Millbank Tower (Grade II listed) and, further north on the opposite side of the Grade II* listed Lambeth Bridge, is the Palace of Westminster, a World Heritage Site. The Vauxhall Gardens Conservation Area is located to the south east of the site.
3.0 Background and Planning History

Background: 8 Albert Embankment

3.1 The London Fire Bridge (LFB) Headquarters was opened in July 1937 in advance of World War II to replace an old headquarters building in Southwark.

3.2 The building was designed and constructed with an appliance bay for seven fire engines, accommodation for officers and staff and a ten-storey high training tower. The building was elaborately designed with sculptures and with a memorial hall. It is located next to the River Station for emergencies on the River Thames, which was also opened in 1937.

3.3 LFB’s operations were provided in two sections on either side of Lambeth High Street (West Site and Central Site). Historically, the ground floor of the ten-storey building on the Albert Embankment provided operational facilities, with the first floor designed for living quarters and recreation rooms for on-duty fire crews together with a London-wide control room. The upper storeys also contained the main administrative offices for LFB and numerous flats for fire officers and their families.

3.4 Across Lambeth High Street is The Workshop, which was home to the research and development section of LFB. The Workshop accommodated garages and repair shops, stores and a training school complete with kitchens and more living quarters. Over the years, The Workshop produced many unique vehicles and pieces of equipment for LFB.

3.5 In 1939 and in view of the impending war, an underground control room was added, which was responsible for mobilising appliances across London. A new control room opened later in 1966 and work on LFB’s new CMC Building commenced in September 1982.

3.6 The original site had also included an LFB museum which was demolished to make way for the construction of the CMC Building. In 1966, the museum moved to Winchester House in Southwark, where it operated until the doors closed in September 2015 in preparation for its intended move back to the Lambeth site - the opening of a new museum was nevertheless delayed by the refused applications and dismissed appeals.

The Need for Improved Facilities

3.7 Today, Lambeth Fire Station has five usable appliance bays and supporting operations on the ground floor with amenity, administrative and training facilities on the first and second floors. The upper floors were used as office accommodation for the LFB Headquarters until 2008, when the LFB moved to a new office headquarters at Union Street, Southwark. Whilst the upper floors are no longer used for the day to day operation of the fire station, they have remained available for operational use.

3.8 The Workshop was also vacated in 2008, having not been used as a vehicle workshop for a decade prior to that point. In November 2016, work began on the conversion of the premises to provide a temporary home for the LFB Museum. Since then, The Workshop has become a major part in the consultation process for the emerging proposals - playing host to public exhibitions and community events. The Workshop has proved highly successful, welcoming over 48,500 visitors through its doors since opening in November 2016.

3.9 The main fire station is in a strategically important location, providing a critical role in the response provided by LFB in Lambeth, Whitehall, Victoria and the Government Security Zone (Westminster Area). Nevertheless, the fire station requires urgent and significant modernisation to provide upgraded facilities that meet the LFB Standard Station Design Brief.
Further details on LFB requirements, and vision for the new fire station are provided in the LFB Operations Statement (Appendix 4).

Planning History

Two planning applications (ref. 10/00318/FUL and 10/04473/FUL) and accompanying applications for Listed Building Consent and Conservation Area Consent were submitted in 2010 for the redevelopment of the site by Albert Embankment LLP (a development company of Native Land) and LFB. The first application (ref. 10/00318/FUL) was withdrawn and the subsequent application (10/4473/FUL) was refused. An appeal was made, but this was subsequently dismissed by the Planning Inspectorate.

Please see Appendix 2 for a summary of the site’s planning history.

Initial Application (10/00318/FUL, 10/00319/LB and 10/00320/CON)

The proposed development then comprised:

1. Refurbishment, reconstruction and extension to the Grade II listed fire station to provide a new fire station and associated functions for the London Fire Brigade (Sui Generis) on part basement and ground floors, with residential (Class C3) above, including demolition of the communication mobilising centre.

2. Demolition of the brigade workshop/office buildings to the rear and construction of 7 new buildings ranging in height from 5 to 16 storeys for mixed-use purposes, comprising residential (class C3); business (class B1) to include offices and studio workshops; shops, financial and professional services, restaurants and cafes, and drinking establishments.

3. Refurbishment and internal alterations to the Grade II listed drill tower.

4. To provide a total of:
   - 360 residential units;
   - 2,660 sqm fire station;
   - 3,917 sqm of commercial floorspace (Use Class B1);
   - 637 sqm of retail/A Class floorspace;

5. 181 parking spaces.

The applications were withdrawn by the applicant before they were formally determined.

Subsequent Applications (10/04473/FUL, 10/04475/LB and 10/04476/CON)

Submitted in December 2010, these applications proposed a revision to the redevelopment proposed in January 2010.

Smaller than the initial application, the proposed development comprised:

1. Refurbishment, alteration and extension (including a single-storey rooftop extension) to the Grade II listed fire station to provide a fire station and associated functions for the London Fire Brigade (Sui Generis) on part basement and ground floors, with residential (class C3) above, including demolition of the communication mobilising centre.

2. Demolition of the brigade workshop/office buildings to the rear of the fire station. Construction of 7 new buildings ranging in height from 1 to 15 storeys for mixed-use purposes, including residential dwellings (class C3); office/business space (class B1);
ground floor units for shops, financial and professional services, restaurants and cafes, and/or drinking establishments (classes A1, A2, A3 and/or A4); and ancillary facilities.

3 Refurbishment and internal alterations to the Grade II listed drill tower associated with the new fire station.

4 Construction of basements to provide servicing, parking, energy centre, plant and storage.

5 Creation of areas of open space and alterations to the existing vehicular and pedestrian accesses and highway arrangements within and around the site.

6 The development sought to provide a total of:
   - 265 residential units (including 19 (7%) affordable units);
   - 2,721 sqm fire station;
   - 8,554 sqm of commercial floorspace (Use Class B1);
   - 696 sqm of retail/A Class floorspace;

7 92 car parking spaces.

The applications were referred to the LB Lambeth Planning Applications Committee with an officer’s recommendation to grant planning permission, Listed Building Consent and Conservation Area Consent but the applications were refused (3 March 2012) at committee for the following reasons:

1 The alterations and extension to No.8 Albert Embankment, and the height and width of Building D, would be unacceptably harmful to the Grade II listed building, Thames Policy Area and Albert Embankment Conservation Area;

2 There would be an unacceptable loss of sunlight and daylight to neighbouring residential properties;
3. There would be an unacceptably low level of affordable housing; and
4. The height and bulk of the development would fail to relate satisfactorily to the adjacent
townscape, taking into account the height, massing and scale of neighbouring buildings and
the historic form of the area.

3.18 It is noted that neither officers nor members raised any further objection as local planning
authority to the mixed-use nature of the development, including substantial new housing on the
central and eastern sites, within a designated Key Industrial and Business Area (KIBA).

3.19 The applicant appealed against the Council’s refusal of the applications.

**Appeal (APP/N5660/A/12/2180815)**

3.20 At the inquiry in 2013, the Inspector identified the four main issues as:

1. Whether the scheme paid adequate regard to local employment and economic objectives;
2. Whether the proposed level of provision of affordable housing was acceptable (7% was
   proposed);
3. The effect the proposal would have on the character, special interest and settings of listed
   buildings, the character and appearance of the Albert Embankment and Vauxhall Gardens
   Conservations Areas and of the surrounding locality; and
4. The impact of the proposal on the living conditions of nearby residential occupiers by
   reason of loss of daylight and sunlight.

3.21 The Inspector concluded that the proposals were acceptable on three of the four main issues.
However, it was considered that the harm identified on the last issue (loss of daylight and
sunlight to Whitgift House and 2 Whitgift Street) represented a shortcoming in achieving a fully
sustainable development that outweighed the benefits of the scheme and warranted dismissal of
the appeal. Listed Building Consent and Conservation Area Consent were also withheld (refs:
APP/N5660/E/12/2180808 and APP/N5660/E/12/2180812). The appeals were dismissed in
May 2013.

3.22 In noting concerns raised by objectors, the amount of employment floorspace, the employment
and wider economic benefits of the proposal and the contribution the proposals would make
Towards regeneration and vitality in the local area by way of an intensive mixed-use
development with active street frontages were all importantly considered by the Inspector to
justify the departure from the KIBA objectives. Similarly, the proposed mixed-use of the front
site was considered to be acceptable having regard to the overall content of the development
(paras. 36 and 37 of appeal decision).

3.23 With respect to heritage matters, it was noted by the Inspector that there would be ‘less than
substantial harm’ to the significance of a designated heritage asset and that this harm would be
outweighed by the public benefits of the proposal, including to:

1. Secure an optimum viable use
2. Bring 8 Albert Embankment back into use
3. Re-establish the fire station as a public benefit with its use being consistent with the
   aspirations of the English Heritage/London Fire Brigade guide,
4. Meet land use objectives and bring economic benefits consistent with the development plan
   and Government policy.
Consultation

3.24 As described in more detail in the Statement of Community Involvement (SCI) accompanying this application, U+I and LFB have embraced the Government’s objectives for community consultation. An open, transparent and creative consultation process has been adopted, with feedback influencing and improving the design of the project, the technical work and assessments undertaken, and the mitigation strategies proposed.

3.25 Extensive pre-application engagement has been undertaken with LBL, the Greater London Authority (GLA) and Historic England, as well as discussions with local stakeholders and the wider community.

3.26 Formal pre-application consultation with LBL has taken place over a series of meetings between 2016 and 2019. The pre-application feedback from LBL, the GLA and Historic England has shaped the design of the emerging proposals and assisted in creating the proposed scheme, which responds to planning policy and the Inspector’s decision on the previous planning application.

3.27 Central to this engagement has been the four presentations of the scheme to LBL’s Strategic Planning Panel (in August 2016, November 2016, June 2017 and June 2018). Feedback from the Panel noted the benefits of: retaining the fire station and providing a new LFB Museum; ensuring the long-term future of the listed building; and the comprehensive approach to redevelopment of the West, Central and East Sites.

Consultation Activities

3.28 Full details of the consultation are not repeated here but, in summary, activities involved both informal and formal consultation between 2016 and 2019. This has included:

- Planning Officer Meetings: U+I, LFB and their consultants have engaged extensively with Officers from LBL (including the Conservation and Urban Design Officer and Highways Officers) and the GLA on a range of topics.

- Statutory Consultees: a series of discussions have been held with statutory consultees including Historic England and Transport for London (TfL), primarily focusing on the potential effects of the proposals on heritage assets and transport.

- Extensive public consultation over seven phases, including three public exhibitions; the first between 8-13 December 2016, the second between 18-21 March 2017 and third between 11-13 July 2018. At the exhibitions, the exhibition boards were available to review and members of the design team (including representatives from the London Fire Brigade) were on-hand to respond to queries about the emerging scheme. The exhibition boards and comments box have been retained within the reception of The Workshop to enable ongoing informal public consultation.

- Flyers: around 7,000 flyers were distributed to homes and businesses within the vicinity of the site prior to all public exhibitions. The information included an outline of the emerging proposals, details of the forthcoming public consultation, a link to the project website and contact details for further comments/queries.

- Website: a dedicated website (www.eightalbertembankment.com) was created in order to provide initial details of the proposals, copies of the exhibition boards and details on how people can get in contact with the project team in order to provide feedback.

- Interest and Community Groups: alongside the public exhibitions, a series of private briefings/meetings with local residents and businesses have been undertaken. These include 9 Albert Embankment Residents’ Association, Friends of Old Paradise Garden, Vauxhall
Garden Estate Residents’ and Tenants Association and Whitgift House Tenants and Residents’ Association.

- Local Councillors: U+I and LFB met with Local Councillors on several occasions and invited key cabinet members at LBL, Prince’s ward councillors and Bishop’s ward councillors to previews of the public exhibitions.

Consultation Feedback

3.29 Overall, the feedback from the public consultation has been positive and has raised a number of points that have been addressed where possible through the design development of the proposal.

3.30 In addition to this engagement, U+I and LFB have also worked with Notting Hill Genesis (NHG) to inform the proposed affordable housing mix. A letter of support for the proposed provision is provided at Appendix 5.

3.31 The SCI confirms that the significant majority of the questionnaires received in response to the public consultations events supported the proposals. The questionnaire feedback can be summarised as follows:

Summary of feedback from First Exhibition

- In total, 101 people attended the three-day public exhibition in December 2016.
- The majority of feedback from the exhibition was positive, with 82% (56 people) indicating that they felt the proposed regeneration was a positive move for Albert Embankment.
- 89% (59 people) were in favour of seeing the fire station upgraded, while 90% (60 people) were also in favour of the LFB Museum being provided. Only five objections were received at the exhibition.
- A number of attendees felt that the proposals will help to make a real improvement to the area, while others were pleased to see the LFB Museum being brought to the site.
- Other positive comments included the retention of the Grade II listed buildings (four people) and the proposed rooftop extension/restaurant on the listed building (four people).
- Local residents provided a number of suggestions for the proposals, including offering more affordable housing in the area (nine people), and requests to see the development integrate with existing sites, activities and architecture in the wider area (six people).
- The main concern raised by residents was regarding the height of the two proposed residential towers (11 people).

Summary of feedback from Second Exhibition

- In total, 106 people attended the three-day exhibition held in March 2017.
- Again, the majority of feedback from the exhibition showed that 84% (37 people) strongly agreed or agreed that the proposed regeneration of 8 Albert Embankment would be a positive move for the local area.
- Local residents provided a number of suggestions for the proposals, including reducing the height of the proposed buildings so that they are lower than the Listed Building (five people) and offering mixed affordable housing (four people), and affordable rents for retail, office and creative spaces (four people).
11 attendees felt that the proposals will help to make the area more active and lively. Other positive comments included the proposals to provide a variety of shops, cafes and restaurants and the general design of the scheme.

In line with comments received in relation to the first exhibition, the main issue concerning respondents was the height of the residential towers (nine people).

**Summary of feedback from Third Exhibition**

- In total, 82 people attended the three-day public exhibition held in July 2018.
- A total of 30 comments cards were received at the exhibition and a letter was sent to the project team with comments on the scheme following the consultation event.
- As per the two previous exhibitions, the majority of the feedback was positive with 64% (18 people) indicating that the proposals were a positive move for the local area, 61% (17 people) supported the changes to the scheme, and 82% (23 people) in favour of upgrading the existing fire station.
- General positive comments were received about the scheme, with the proposed pedestrian routes and improvements to the public realm welcomed.
- Local residents provided a number of suggestions for the proposals, including that they would like to see the development retain and reflect the site’s heritage (four people), and provide more affordable housing / social housing in the area (three people).
- The primary concerns raised focussed on the height and massing of the proposed buildings as well as concerns over the potential for increased traffic in the area.

**Further public engagement**

Follow-up stakeholder and local resident engagement has continued since the Third Exhibition. This has included stakeholder and local resident workshops in 2018 and 2019 on key planning issues such as the proposed employment strategy, placemaking, daylight/sunlight, residential amenity and heritage.

**Responding to Feedback**

The feedback received throughout the consultation process has shaped the design evolution of the proposals. Key design changes resulting from this feedback include:

- Affordable housing - increased provision of affordable housing, including the proportion of affordable/social rented housing.
- Heights - revised in order to accommodate additional affordable housing and respect key viewpoints.
- Massing - adjusted in response to the heritage and daylight/sunlight constraints of the site. Of note, the design of the proposed Office Building has evolved to provide a slimmer building to enable expansion of the Whitgift Street Building and reduce impacts on daylight and sunlight into nearby buildings.
- Materiality of the Central Square and East Garden Buildings - the proposed colouring to the terracotta screens (as a blue, grey green) has been carefully chosen to complement surrounding colour pallets seen in key views. Other colour options considered included off white and red/umber.
- Variety of workspaces - provision of a wider range of employment opportunities, including office spaces (including low cost and affordable flexible workspace) and for large office occupiers, MSMEs and start-ups to grow.
3.34 The SCI prepared by London Communication Agency provides a full account of the adopted approach to consultation; the comments received; and the consideration given to feedback received during the process of finalising the designs that are the subject of this planning application.

3.35 The Design and Access Statement (Section 2) also describes the design evolution of the proposals and consultation process (Section 13).
4.0 Scheme Proposals

LFC and the U+I Selection Process

4.1 Following the dismissal of the appeal in respect of the Native Land scheme, the London Fire Commissioner (LFC), formerly the London Fire and Emergency Authority (LFEPA), held a competitive tender process to select a new development partner for the redevelopment of the site. The tender brief expressly required the re-provision of a fire station and provision of a LFB Museum.

4.2 LFEPA undertook a robust selection process in accordance with the Official Journal of the European Union procurement procedures and, in April 2016, selected U+I as its development partner. U+I has since then worked closely with LFEPA/LFB and a highly experienced team of specialist consultants to develop a proposal that will deliver on the brief for a modern ‘fit for purpose’ fire station and provide a truly mixed-use scheme that will optimise employment uses on the site, make a strong contribution towards public realm and placemaking and deliver an important and diverse range of public benefits.

Scheme Proposals

4.3 Informed by extensive pre-application consultation and discussions with NHG, the proposed development comprises a phased mixed-use development across the west, central and east parts of the site.

4.4 In summary, the proposals seek to deliver 417 new homes, including 146 affordable homes (35% affordable by unit and 34% affordable by habitable rooms) alongside over 24,000 sqm (GIA) of non-residential floorspace. The non-residential floorspace comprises:

- 2,203 sqm new fire station for LFB (Sui Generis);
- 1,434 sqm London Fire Brigade Museum (Use Class D1);
- a hotel of up to 200 bedrooms, 6,270 sqm (Use Class C1) including a 56 sqm flexible retail or hotel space (Use Classes A1/A2/A3/A4/C1);
- 10,809 sqm of new office floorspace, including:
  i  9,123 sqm of corporate office floorspace (Use Class B1(a));
  ii  1,348 sqm of medium workspace floorspace (Use Classes B1(a) / B1(b) / B1(c));
  iii  186 sqm of small workspace floorspace (Use Classes B1(a) / B1(b) / B1(c));
  iv  142 sqm of micro workspace floorspace (Use Classes B1(a) / B1(b) / B1(c));
- 455 sqm flexible retail floorspace (Use Classes A1/A2/A3/A4);
- 173 sqm flexible commercial unit (Use Classes A1/A2/A3/A4/B1(a)/B1(b)/B1(c)/D1/D2);
- a gym of up to 2,053 sqm (GIA) gym (Use Class D2); and
- a 865 sqm restaurant (Use Class A3); together with
- associated areas of new public realm, hard and soft landscaping, basement and surface parking, servicing, means of access and plant and equipment.

4.5 The proposals are described in detail on the planning application drawings and in the Design and Access Statement. A summary for each part of the site is provided below:
West Site

1. The demolition of the CMC Building (the existing 1980s three storey rear extension to the Fire Station Building);
2. Partial demolition and remodelling of rear and roof level of the Fire Station Building;
3. Demolition of the Obelisk and its re-provision within the Central Site;
4. Creation of a ten-storey rear L-shaped extension to provide an hotel (Use Class C1);
5. The erection of a single storey glazed extension to the Fire Station Building to provide a rooftop riverside restaurant (Use Class A3) linked to the hotel via a footbridge at tenth floor level;
6. Provision of a flexible ground floor space for either retail or hotel use (Use Classes A1/A2/A3/A4/C1) to be used either by an independent operator or incorporated as ancillary hotel lobby space;
7. Change of use of part of the ground and basement levels and new development to provide a LFB Museum (Use Class D1), bicycle parking and indoor residential amenity space associated with the residential uses above;
8. Extensive internal alterations and extension of the Former Headquarters Building to facilitate provision of the fire station (Sui Generis), LFB Museum (Use Class D1) and up to 95 new residential units;
9. Extension of the basement to provide part of the LFB Museum; plant and parking;
10. The retention and refurbishment of the Grade II listed Drill Tower to enable continued use as a drill tower (Sui Generis);
11. Associated public realm, hard and soft landscaping, means of access and plant and equipment.

Central Site

12. Demolition of The Workshop building;
13. Erection of four buildings of five, nine, twenty-four and twenty-six storeys, comprising a range of office and workspace units (Use Classes B1(a)/B1(b)/B1(c)), a gym (Use Class D2), flexible retail units (Use Classes A1/A2/A3/A4) and up to 292 residential units (Use Class C3) in a range of buildings;
14. The creation of a lower-ground floor level (including workspace and gym floorspace) and a two-storey basement to provide associated plant, parking, servicing and means of access;
15. Associated areas of new public realm and hard and soft landscaping, including re-provision of the Obelisk.

East Site

16. The erection of an eleven-storey building to provide a flexible retail/commercial unit (A1/A2/A3/A4/D1/D2/B1(a)/B1(b)/B1(c)) at ground floor level and up to 30 residential units above;
17. Associated roof level landscaping and plant (including at lower-ground floor level).

Public Realm

4.6 Across the site, the proposal seeks to deliver the following substantial new areas of public realm:
1. The extension and improvement of the public realm between the West and Central Sites through the provision of a new public space at the southern end of Lambeth High Street, offering improved setting to the listed Southbank House;

2. Creation of public squares to the west and east of the Central Site together with a wide and attractive connecting pedestrian route;

3. Associated hard and soft landscaping and public realm improvements throughout the site.

As outlined during pre-application discussions, it is proposed that the development will constitute a phased development.

For the purposes of the Community Infrastructure Levy Regulations 2010 (as amended) each phase of the development will, therefore, constitute a separate “chargeable development” and the relevant information required to allow LB Lambeth and the GLA to calculate the CIL liability, and any claims for relief, will be made before the commencement of each phase. A phase for these purposes is that noted on the phasing plan which is to be an approved drawing on the permission. The phasing plan shows:

1. Phase 1 - West Site
2. Phase 2 - Central (part) and East Site
3. Phase 3 - Central Site (remaining part)

The Environmental Statement assesses the impact of the proposed development on the basis of these phases and as shown on drawing 1528-PP-Zo-XX-DR-A-00-1007. As a priority is the need to complete and occupy the fire station as the first phase. We request that a planning condition requiring works to be carried out in accordance with the approved phasing plan is included. The following wording is suggested:

“Construction of the approved development shall be undertaken in accordance with the approved phasing plan ref. 1528-PP-Zo-XX-DR-A-00-1007”.

The detailed construction trajectory for delivery of the phases is set out in Chapter 5 of the ES.

Listed Building Consent Application

The planning application is accompanied by an application seeking Listed Building Consent for works to No. 8 Albert Embankment, including the demolition of the existing extension (CMC Building) and Obelisk and part redevelopment, restoration, conversion and extension of the former Fire Brigade Headquarters building to provide a new fire station (Sui Generis), a LFB Museum (Class D1), 95 residential units (Class C3) and a ten storey hotel (Class C1) with up to 200 bedrooms, and a rooftop restaurant with ancillary bar (Class A3).

Balances in Scheme Content

Led by the requirement to provide an upgraded fire station, LFB Museum and significant employment floorspace to support employment policies, the proposed development aims to provide a well-balanced scheme through:

1. Meeting the requirements of LFB’s brief;
2. Preserving and enhancing heritage assets;
3. Protecting the amenity of surrounding land users;
4. Realising the employment potential of the site;
5. Providing a critical mass of employment uses and homes to facilitate regeneration and support the retail and leisure uses on the site;
6 Delivering community and placemaking benefits;
7 Supporting culture and creative uses within central London; and
8 Creating public realm and permeability through the site.
Planning and Heritage Balance

Planning Balance Approach

5.1 In considering the overall acceptability of the proposals, both heritage and planning legislation need to be considered. These are separate but overlapping provisions, with it being made clear through the Courts that the overall effect of the proposals on heritage matters - effects on the listed buildings, on the setting of nearby listed building(s) and on the local and nearby conservation areas - are to be considered first to arrive at an overall judgement on effects, with the conclusion then becoming part of the basis for planning consideration based on conformity with the statutory development plan and other material considerations.

Legislation

5.2 Legislation relating to the protection of the historic environment is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. As explained within the Heritage, Townscape and Visual Impact Assessment (Section 2), this requires local planning authorities to have special regard to the desirability of preserving the special interest of listed buildings, conservation areas and their settings.

5.3 With respect to this application, the applicable statutory provisions are: Section 16(2) relating to the direct impact of proposals on the special interest of a building; Section 66 (1) relating to the indirect impact of proposals on the setting of listed buildings; and Section 72 (1) relating to the direct impact of proposals on the character or appearance of conservation areas.

Heritage Balance

5.4 Paragraph 196 of the NPPF notes that, where the overall net balance of heritage considerations is that any harm is less-than-substantial, “this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.”

5.5 As confirmed recently and for this balancing, the relevant heritage assessment needs to look at the net overall effects on heritage assets, recognising that there are some harms and some benefits with different levels of weight given.

5.6 In this case, the assessment is made that there is overall heritage benefit from the proposals. Accordingly, for the planning balance, these various benefits become important additional material considerations.

5.7 The Heritage Townscape and Visual Impact Assessment (HTVIA) records that “The judgment about direct impacts on the listed buildings is one taken in the round, on the basis of the end result, balancing off some harmful impacts” and noting that, in relation to 8 Albert Embankment, “the net effect would be beneficial because the building would have a secure future use, including for its original purpose and an educational purpose that reflects that original purpose”, and “the building fabric, in poor condition, would be repaired and put into a long-term maintenance regime from that use.” The Environmental Statement concludes that in respect of the listed buildings - No. 8 Albert Embankment and the Drill Tower - there is no net harm and that the direct impacts on the listed Former Fire Brigade Headquarters Building are of a Moderate Beneficial effect, with considerable importance and weight in the planning balance.

5.8 Of note, the rooftop extension is judged to sensitively integrate into the Former Fire Brigade Headquarters Building and to add a modern element of high-quality design that would be a visual expression of a new chapter of the building and reinforce the visual prominence of the building as a landmark on the Albert Embankment. The re-provision of the Obelisk within a
prominent part of the Central Site for its original use (as a ventilation shaft) is also noted to have heritage benefits whilst also providing a marker of interest in views east and west.

5.9 The substantial improvements to the setting of the adjoining listed former Royal Doulton factory building by making it visible from the Albert Embankment and the enhancement of Lambeth High Street through the setting back of the proposed building lines together create a Moderate Beneficial effect on the setting of listed buildings, as assessed in the Environmental Statement. In respect of impacts on listed buildings, the Environmental Statement concludes that the grant of consent would “completely accord with statutory provisions at section 16 (2)” and applies equally in respect of setting considerations (Section 66) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

5.10 The scheme components and their overall effects on the Albert Embankment Conservation Area are such that the ES concludes that there is a Moderate Beneficial effect on the conservation area, reflecting the conclusion that the proposals would enhance the character and appearance of the conservation area. The proposal will involve the demolition of the CMC Building (a negative feature within the setting of the conservation area) and The Workshop (which makes a neutral contribution to the conservation area) and replacement with high quality mixed-use buildings and public realm; to the benefit of the conservation area. Similarly, the redevelopment of the currently undeveloped East Site is considered in keeping with the character of the conservation area. The Environmental Statement finds that the statutory provision in respect of impacts on the character and appearance of the Albert Embankment Conservation Areas have been met.

5.11 Taken together, the cautious and detailed analysis, as set out in the ES and accompanying Heritage Assessment, concludes that the balance of any minor individual harms arising from building alterations and extensions are clearly outweighed by the listed buildings’ restoration for secure long term beneficial use and their re-use in part for original purpose as a fire station – hence preserving the significance of the building in terms of its historic purpose and association. There is also enhancement to the character and appearance of the conservation area. The resulting outcome is no net harm and an overall beneficial effect.

Any Alternative View on Assessment

5.12 Paragraph 196 of the NPPF is only engaged if a proposal taken as a whole, comprising harmful and beneficial impacts, leads to net heritage harm. It is on this basis that the proper balancing of planning considerations can be assessed.

5.13 Notwithstanding the conclusion reached here that there is a net beneficial effect on heritage assets, if the decision-maker alternatively comes to a view that the overall effect of the proposals on heritage interests is ‘less than substantial’ harm (rather than net beneficial or neutral), the appropriate alternative basis for planning consideration and balancing would then be that derived from paragraph 196 of NPPF, i.e., weighing perceived (but limited) harm against the substantial “public benefits” arising, including “securing its optimum viable use”.

5.14 The Planning Practice Guidance expands on the definition of optimum viable use and confirms that, in instances where there are a range of alternative viable uses, “… the optimum use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes.” (ref. PPG, 015 Reference ID: 18a-015-20140306, revision date 06.03.2014)

5.15 The proposed development seeks to restore the listed building with sensitive interventions. The proposals will deliver on the LFB’s objectives of retaining the listed building in its original use to provide a modern fire station that meets the operational requirements of the LFB. The
residential use is well-suited to the building and would allow sensitive restoration of the listed building. The upper floors were also built as firefighter residential quarters, so the conversion to provide residential accommodation would also better accord with the building’s original use.

5.16 The residential values that can be achieved within 8 Albert Embankment are also important to the viability of the project and it is noted that the Inspector’s appeal decision considered residential use at the West Site to be appropriate, given the fire station re-provision and overall context of the development (para. 37 of the appeal decision, ref. APP/N5660/A/12/2180815 and 2180808).

Public Benefits

5.17 In addition to heritage benefits, the proposals will deliver many important other public benefits¹, including:

1 Heritage - Restoration of two underused listed buildings, including partial re-use for original purposes, preserving the significance of the buildings in terms of their historic purposes and association and securing the buildings' long-term future;

2 Emergency Base - Creation of a new modern ‘fit for purpose’ firefighting and emergency services base for central London in a strategic location to achieve fast response times to increasingly-regular emergency incidents;

3 Fire Station - Provision of a fire station and LFB Museum that will facilitate LFB engagement with the local community;

4 Museum - Creation of a permanent home for the LFB museum, at its original site, resulting in educational and cultural benefits to the locality and wider London;

5 New Homes - Delivery of new housing, including 35% affordable housing;

6 New Residents - Helping to deliver a boost to the local economy through ‘first occupation expenditure’ of £2.3 million on goods and services, a proportion of which will be retained locally;

7 Resident Expenditure - Generating circa £3.9 million of additional resident expenditure in shops and services each year, in turn supporting 35 permanent FTE jobs in the local area;

8 New and Diverse Employment Opportunities - Creation of space for over 1,250 on-site jobs across a range of sectors (including medium, small and micro workspaces well suited to small creative and cultural businesses and start-ups) and creation of additional jobs during construction and from associated resident and occupier expenditure;

9 Economic Value - Generating £93 million of direct and indirect Gross Value Added (GVA) per annum during the construction phase and £103 million of direct GVA per annum once operational;

10 Business Rates - Payment of more than £1.7 million of business rates paid to LBL per annum;

11 Placemaking - Revitalising the local area through the introduction of active uses between Waterloo and Vauxhall;

12 Tourist Interest - Adding to and spreading tourism and leisure infrastructure along the river on South Bank through the provision of a new hotel and the re-instated museum;

¹ The economic benefits outlined at bullet points 6, 7, 9 and 10 have been estimated based on the Lichfields socio-economic methodology using publicly available data.
13 Public Views and Access - Creation of a roof top restaurant offering public access to substantial river views;

14 Public Realm - Enhancements to public realm and wayfinding, including through provision of around 1,900sqm of high quality, permeable public realm (currently the site does not provide any public realm and the appeal scheme provided less than 600sqm);

15 Cultural - Provision of active uses on Newport Street complementing its attractiveness as a destination for arts and cultural uses and provision of the LFB Museum - a museum identified for delivery in the Mayor’s Culture Strategy (2018);

16 Sustainability - Reuse of a largely-vacant brownfield building and land in central London;

17 Planning Obligations - Financial contributions towards the delivery of local infrastructure via the Community Infrastructure Levy (CIL) and s106 contributions.

5.18 In addition, and importantly, the redevelopment will support LFB’s Capital Programme, through which the Authority funds much needed improvements to fire stations, vehicles and equipment throughout London. As noted within LFB’s Operations Statement (Appendix 4), LFB’s Asset Management Plan (AMP) 2017 sets out the priorities for investment in fire stations and other properties. Brixton and Clapham fire stations are both identified as requiring significant projects or works to be undertaken.
6.0 Planning Policy Context

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts and that the determination should be made in accordance with the Development Plan unless material considerations indicate otherwise.

6.2 This section of the Planning Statement details the policy context for the application, describing the Development Plan policies relevant to the consideration of the scheme, as well as providing an account of the prevailing policy guidance in the National Planning Policy Framework (NPPF 2019) and other documents that represent appropriate material considerations.

Statutory Development Plan

6.3 The Statutory Development Plan comprises:
   1 The London Plan (2016); and
   2 Lambeth Local Plan (2015).

6.4 Within the Development Plan, the site is subject to the following planning designations:

   **The London Plan**

   6.5 The West and Central Sites are allocated within:
   1 London Plan Thames Policy Area; and
   2 London Plan Central Activities Zone.

   6.6 The whole site falls in the background of a number of protected view corridors from Primrose Hill and Parliament Hill to the Palace of Westminster (the Palace of Westminster being a World Heritage Site).

   6.7 The whole site also falls within the Vauxhall, Nine Elms, Battersea (VNEB) Opportunity Area.

   **Lambeth Local Plan**

   6.8 The whole site is allocated for mixed-use development, including residential and employment uses, under Policy PN2 Site 10. The following designations are relevant to the site:

   **Whole site**
   - Albert Embankment Conservation Area
   - Air Quality Management Area
   - Flood Zone 3a

   **West site**
   - Archaeological Priority Area

   **Central Site**
   - Key Industrial and Business Area (KIBA)
   - Archaeological Priority Area
East site

- Key Industrial and Business Area (KIBA)

Emerging Planning Policy

6.9 In accordance with Paragraph 48 of the NPPF, the decision-maker may also give weight to relevant policies in emerging plans according to the stage of preparation, number of outstanding objections and consistency with the NPPF.

6.10 The new draft London Plan (August 2018) was consulted on between 1 December 2017 and 2 March 2018. Minor suggested changes to the new draft London Plan were published in August 2018 and the Examination in Public (EiP) commenced in January 2019. Given this represents an early stage of the review, some limited material weight may be given by the decision-maker to the draft policies as recorded in this Statement. Pertinent to the proposed development is draft Policy GG2, which promotes making the best use of land, including through the creation of high-density, mixed-use development in Opportunity Areas - and on brownfield and surplus public sector land. The proposed development complies with this draft policy, reflecting as it does the good principles for sustainable development.

6.11 LB Lambeth commenced a review of its Local Plan in 2017, as required by the previous EiP Inspector in view of the Plan’s non-compliance with then updated housing targets from a reviewed London Plan. LBL undertook an initial consultation on key issues between October and December 2017 and issued a Draft Revised Lambeth Local Plan for consultation between October and December 2018. The draft represents LBL’s initial consultation on proposed changes to the Local Plan. Of note, the Draft Revised Local Plan includes new policies on affordable workspace (ED2) and revised policies related to KIBAs (ED3). The site allocation related to 8 Albert Embankment (PN2 Site 10) and the KIBA boundary related to the site is not proposed to be amended. Adoption is targeted for September 2020. Due to the early stage of the Local Plan production, little material weight is currently applied to the emerging Revised Lambeth Local Plan.

6.12 The site falls entirely within the Kennington, Oval and Vauxhall (KOV) Neighbourhood Forum Area. The Forum consulted on the Pre-Submission version of the KOV Neighbourhood Plan between March and May 2018. The document included a number of draft policies, including a requirement for affordable workspace provision (10%) and net increases in employment provision for redevelopment proposals involving sites currently used for employment uses. The next stage of progression is submission of the Plan to LB Lambeth, which will then consult on the plan for six weeks before the draft plan and any further representations are submitted to the Planning Inspectorate for EiP. Due to the early stage of production, limited weight is afforded to the draft policies.

Other Policy Considerations

6.13 In addition to the Statutory Development Plan and emerging policy, the following documents are considered relevant and material in determining this application:

National Planning Policy

- National Planning Policy Framework ‘NPPF’ (CLG, February 2019);
- Planning Practice Guidance (‘PPG’) (CLG; 2014, 2017 and 2018); and
- Nationally Described Standards (March 2015).
Regional Guidance

1. Accessible London - Achieving an Inclusive Environment SPG (2014);
2. Affordable Housing and Viability SPG (2017);
3. Central Activities Zone SPD (2016);
4. Character and Context SPG (2014);
5. Culture Strategy (2018);
6. Culture and Night-Time Economy SPG (2017);
7. Historic England Guidance (various);
8. Housing SPG (2016);
9. Land for Industry and Transport SPD (2012);
10. London View Management Framework SPG (2012);
11. London World Heritage Sites SPG (2012);
12. Planning for Equality and Diversity in London SPG (2007);
13. Shaping Neighbourhoods: Play and Informal Recreation SPG (2012);
14. Sustainable Design and Construction SPG (2014);
15. The Control of Dust and Emissions During Construction and Demolition SPG (2014);
16. Town Centres SPG (2014); and

Local

18. Building Alterations and Extensions SPD (2015);
19. Development Viability SPD (2017);
20. Draft Revised Planning Obligations SPD (2013);
21. Employment and Skills SPD (2018);
22. Lambeth Air Quality Action Plan 2017 to 2022 (2016);
23. Lambeth Air Quality Planning Guidance Notes (2015);
24. Refuse and Recycling Storage Design Guide (2013); and

Implications of the earlier Appeal Decision

6.14 It is necessary to approach the current case on a de novo basis but with due weight given to the Appeal Inspector’s conclusions on:

1. Heritage: where he concluded that there was ‘less than substantial’ harm overall.
2. Employment and KIBA policy: where he concluded that the mixed-use/employment approach was both acceptable and beneficial in the context of general employment and KIBA policies.
3. Daylight/sunlight: where he found that the level of impacts was unacceptable.
4. Affordable housing at 7% by unit: which he found acceptable (as recognised by officers as based on viability assessment) in the context of all other requirements and subject to a pre-implementation review.
Overview of Key Policy and Material Considerations

6.15 A detailed summary of relevant planning policy is provided at Appendix 3. The prevailing policies across the various documents establish a number of policy themes that assist in the consideration of the proposed development. As noted above, the planning history for the site is also helpful in this regard, identifying the key issues associated with the Native Land scheme.

6.16 Considerations such as employment generation, economic growth and sustainability, community infrastructure, tourism and heritage, for example, all contribute to the policy context for the proposal.

6.17 These themes have been grouped together in structuring the next section, which assesses the planning application against the Development Plan and other material considerations.
Development Assessment

This section assesses the proposed development against the relevant planning policy summarised in the previous section and described in more detail at Appendix 3. The main policy themes arising are considered to comprise the following:

1. Mix of Uses
2. Employment and Economic Benefits
3. Housing Provision
4. Heritage
5. Design, Townscape and Public Realm
6. London View Management Framework
7. Culture and Tourism
8. Highways, Parking and Servicing
9. Landscaping, Ecology and Trees
10. Energy and Sustainability
11. Amenity
12. Other Environmental Considerations

Mix of Uses

7.2 The NPPF promotes the efficient use of land and requires making as much use as possible of previously-developed land, specifically acknowledging the multiple benefits that can be delivered through mixed use schemes (Paras. 117-118).

7.3 The London Plan and the Lambeth Local Plan both make clear their firm support for high quality mixed-use development as a key component of the area’s regeneration and further enhancement, recognising the unique characteristics of such an approach in supporting the character and quality of placemaking for London and Lambeth and in achieving more sustainable use of available land.

7.4 With Opportunity Areas identified as the capital’s major reservoirs of brownfield land, the London Plan champions their significant potential to accommodate new housing, commercial and other development (London Plan para.2.58). Development proposals within such areas are required to “seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses”, supporting wider regeneration through integration of development proposals with surrounding areas (London Plan Policy 2.13).

7.5 Unlike the majority of Opportunity Areas located within the CAZ (where offices and other CAZ strategic functions are given greater weight than residential development), the CAZ SPG (2016) confirms that “offices and other CAZ strategic functions may be given equal weight relative to new residential” within the Vauxhall, Nine Elms, Battersea (VNEB) Opportunity Area (Table 1.1). This balance is proposed to be incorporated within the emerging new draft London Plan, which states that other CAZ strategic functions within the VNEB Opportunity Area should again be given equal weight relative to new residential development (Policy SD5 C).

7.6 The SPG recognises that mixed use development can deliver many positive outcomes, including accommodating growth, making efficient use of land and promoting attractive, successful and
vibrant places with a range of activities used through the day and evening, thereby increasing safety and security. It further, and specifically, identifies that mixed use development in the VNEB OAPF should support new cultural attractions and “the emergence of new clusters of cultural activities within the CAZ” (Para. 2.2.5).

7.7 The London Plan confirms that, as an integral part of the CAZ, VNEB Opportunity Area “has scope for significant intensification and increase in housing and commercial capacity” (London Plan Annex One, p372) and identifies the area for an uplift in employment capacity by up to 25,000 jobs and a minimum of 20,000 new homes.

7.8 The VNEB Opportunity Area Planning Framework (OAPF)(2012) was prepared jointly by the GLA and LB Lambeth (and LB Wandsworth) and sets out the overall requirements for the area of London running southwards from Lambeth Bridge to the Nine Elms major regeneration area and beyond. It notes in particular that “high density mixed-use housing-led intensification is anticipated on Albert Embankment” (para.4.2), thus reinforcing the wider opportunities afforded within OAPF locations. This is illustrated at Figure 4.5, extract below:

Figure 7.1 Proposed Residential Intensification - Extract from VNEB OAPF (Figure 4.5)

7.9 Both the London Plan and OAPF establish a number of objectives for development that has a bearing on the location and mix of uses, including seeking to:

1. Increase housing choice and supply and optimise housing output;
2. Realise the potential of brownfield land;
3. Encourage higher residential densities in central locations with a high PTAL;
4. Promote more mixed and balanced communities;
5  Support economic growth and the strategic functions of the CAZ, including through the provision of visitor accommodation and a range of employment opportunities; and
6  Promote new cultural and visitor attractions.

7.10  Whilst the Native Land application was ultimately refused at appeal, it included a replacement fire station, office and flexible retail floorspace (A1, A2, A3 and/or A4) alongside new residential. The Appeal Inspector confirmed the proposed mix of uses to be acceptable, even though he found the then-proposed urban form too intrusive in terms of its daylight/sunlight effects.

7.11  At a more local level, LB Lambeth has sought significant development in the area covered by the Vauxhall SPD (2013), which translates the objectives of the VNEB OAPF into a localised level of detail.

7.12  The site at 8 Albert Embankment occupies a central location in that area, connecting the character areas of Lambeth Gateway and Central Embankment and providing a link between Lambeth High Street, Albert Embankment and Newport Street.

7.13  The Vauxhall SPD encourages the mix and concentration of uses to strengthen the function of Black Prince Road Local Centre. Figure 5.12 identifies the West and Central Sites as being suitable for both residential and employment uses.

7.14  In respect of the opportunity for taller buildings to establish a suitable and varied skyline in the context of the long-term presence of standard building heights along the Embankment, Paragraph 4.914 of the Vauxhall SPD notes that “the Council suggests that this is best achieved (in the absence of any GLA density controls), by assuming a plot coverage of no more than 40% can be taken to the full height of the 80-90 metre zone. This will always ensure that there is a separation between towers and that the objective of a varied and interesting skyline is achieved.” The SPD notes that “proposals for the Fire Station will need to be carefully considered given the special character and visibility of the riverside” (Para. 5.12).

7.15  The proposed buildings are all below 90 metres. Two buildings (the Central Square Building and Eastern Garden Building) fall within the 80-90m height range, representing a 10% plot coverage taken to 80-90m across the entire site, and 17% plot coverage when considered on the Central Site – significantly lower than the maximum 40% plot coverage identified as being suitable to create a varied skyline.

7.16  Located within the Lambeth Gateway character area of Vauxhall, adjacent to the Central Embankment character area (to the south), Policy PN2 of the Lambeth Local Plan promotes active ground-floor frontages, an expanded range of employment and residential uses and a rich mix of uses and diversity of attractions. Policy PN2 highlights the need to secure “more balanced and mixed communities, including land for employment opportunities”.

7.17  The site’s allocation within the adopted Lambeth Local Plan (Policy PN2 Site 10) draws on the guidance set out within the Vauxhall SPD and objectives of Policy PN2. The preferred uses comprise the retention of the fire station and the provision of a mix of uses, including residential and employment, with the amount of replacement employment being maximised and including space for small and medium enterprises. The allocation confirms that, exceptionally, configuration of the site to include some residential within the KIBA boundary may be considered “if it can be demonstrated that this is necessary to achieve an acceptable scheme in all other respects”. Active frontages are also sought opposite the Black Prince Road Local Centre and along Lambeth High Street.
Proposed Content

7.18 In general terms, the proposed development incorporates uses which have been arranged with the more active and flexible uses provided at ground floor level and with office and residential uses above.

7.19 Ground floor uses also include office lobbies and the medium and smaller scale employment uses (B1(a), B1(b) and B1(c), flexible retail floorspace (A1, A2, A3 and/or A4), the LFB Museum, hotel lobby and gym entrance.

7.20 In accordance with the CAZ SPG, the hotel is provided within the West Site – off Lambeth High Street. A rooftop restaurant with its wide-ranging view over the River Thames and Parliament will also contribute towards the vibrant and mixed character of the CAZ, in line with the aims of the Culture and the Night Time Economy SPG. At ground level, the hotel lobby has been designed to allow for a standalone flexible retail unit (A1, A2, A3 and/or A4) to be provided adjacent to the main entrance of the hotel – thereby rejuvenating Lambeth High Street and providing a link between the proposed residential, commercial and public sections of the site. Alternatively, that space could be incorporated within the hotel (C1) to provide an enlarged lobby.

7.21 The location of the restaurant and LFB Museum within the CAZ are further encouraged by the Mayor’s Culture Strategy (2018) and emerging new draft London Plan (2018).

7.22 In accordance with preferred use and design principles outlined in the site allocation (Policy PN2 Site 10), the proposed development:

1. Retains Lambeth Fire Station;
2. Provides a mix of residential and employment uses;
3. Maximises the amount of replacement employment floorspace and includes space for small and medium enterprises; and
4. Activates Lambeth High Street and land opposite Black Prince Road Local Centre through the provision of active uses.

7.23 As contemplated by Policy PN2 Site 10, the proposal includes residential within the KIBA boundary (Central and East Sites). For exceptional circumstances outlined in the section below, it is found that the inclusion of residential in these parts of the site is necessary to achieve an acceptable scheme in all other respects.

7.24 Overall, the mix of uses and principle of development is therefore considered to be in accordance with planning policy.

Employment and Economic Benefits

7.25 Being located within the CAZ and VNEB Opportunity Area and partly within a KIBA, employment provision is naturally a major component of the proposals.

7.26 On a general basis, the Summary of Spatial Planning Issues (Lambeth Local Plan, 2015) indicates that, over the medium to longer term (to 2031), services, hotels and restaurants are predicted to experience the strongest growth in employment, alongside business services remaining as one of the key sectors overall. In this context, the Spatial Strategy identifies requirements for over 130,000sqm of additional offices space (GIA) and around 2,000 new hotel rooms to be provided in Lambeth by 2036.

7.27 Policy ED3 (large offices) then provides general support for offices greater than 1,000sqm in the CAZ and Vauxhall and Waterloo London Plan Opportunity Areas. Such development on the site
would therefore accord with the London Plan and Lambeth Local Plan office policy requirements.

**Employment Protection: KIBA**

7.28 In parallel, the Spatial Strategy also notes (para.2.65) in a descriptive way that Lambeth’s 28 KIBAs represent the borough’s strategic reservoirs of land for business use; are well-occupied; and provide land for lower value uses, support functions and the growing low carbon economy (including waste management).

7.29 As a general approach in respect of such areas, the ensuing Policy ED1 indicates the general presumption that “development in KIBAs will be permitted only for business, industrial, storage and waste management uses, including green industries and other compatible industrial and commercial uses (excluding large scale retail) ancillary to, or providing for, the needs of the KIBA” (Lambeth Local Plan, page 58).

7.30 Whilst the Local Plan suggests that the identified KIBAs are regarded as Lambeth’s ‘Locally Significant Industrial Sites’ as defined in the London Plan, in so doing it widens the scope of those London Plan policy objectives to indicate that they represent the borough’s strategic reservoirs of land for business uses more generally, clarifying in Paragraph 6.5 that further Class B uses (such as offices, research and development, and industrial processes) are to be acceptable and that ‘business, industrial and storage’ uses “include all uses in the B use class (B1, B2 and B8)” (Lambeth Local Plan, para.6.4).

7.31 The supporting text (para.6.10) goes on to state that, in the case of the Southbank House and Newport Street KIBA, (including the Central and East Sites) which falls within the VNEB Opportunity Area, “KIBA policy takes priority over other policies in the plan”. Accordingly, there is a clear local position that development within the KIBA could, in policy terms, fall within any Class B land use, ranging from waste management and light industry (unlikely to be acceptable in any event on the site in view of the proximity of existing housing and active other office spaces and the heritage context of the site) through to high quality offices (as proposed) and smaller workspaces (B1(a), B1(b) and B1(c)).

7.32 However, any such office development would more properly and normally be considered both under wider London Plan office policies (including mixed-use requirements) and additionally through Lambeth Local Plan Policy ED3.

**Exceptional Circumstances: Residential within the KIBA**

7.33 Two of the three parts of the site (the Central and East Sites) are located within the KIBA. Land use alternatives, testing employment-only uses on the KIBA sites versus a mixed-use approach, have been evaluated jointly with LB Lambeth during pre-application processes (see Chapter 2 of the Design and Access Statement). This testing concluded that a mixed-use approach blending residential and employment across the three sites delivers the significant overall planning benefits of a wider range of jobs, more housing (including affordable), an enhanced public realm and significant additional heritage benefits as compared with an alternative scheme with employment only within the KIBA - achieving an “acceptable scheme in all other respects” as established by PN2 Site 10.

7.34 The most recent KIBA review was undertaken in October 2018. This suggests that the Southbank House and Newport Street KIBA (containing the central and east sites) should be protected in its current form and with no alterations to the KIBA boundary; representations by both LFB and U+I have been made as objections to this suggestion and requiring reconsideration by LB Lambeth.
In assessing the potential of the KIBA to meet future demand for employment land/business floorspace, the KIBA review notes (at page 126) that, whilst the preferred use is set out at Policy PN2 Site 10, the potential of the Central and East Sites (referred to as parcels 2 and 3) to meet the demand for employment uses will depend “on the outcome of this proposal” - raising the question of whether there is a good prospect of an application coming forward for KIBA only uses within the Central and East Sites.

Acknowledging the changes in the demand for land, the NPPF (Para. 120) notes that where there is no reasonable prospect of an application coming forward for the allocated use, applications for alternative uses should be supported where the propose use would “contribute to meeting an unmet need for development in the area”. The NPPF recognises the value of using suitable brownfield land within settlements “for homes and other identified needs” and specifically supports the development of “under-utilised land and buildings, especially if this would help to meet identified needs for housing where land is constrained and available sites could be used more effectively” (Para. 118). Housing need within Vauxhall, and the need to secure more balanced and mixed-use communities, is specifically identified at Policy PN2 Part N.

U+I has sought to ensure close compliance with local planning policies, including Policy ED1 for protection of KIBAs. Indeed, the Local Plan allocation for the 8 Albert Embankment site does not preclude residential development but, rather, notes that residential uses within the KIBA boundary may indeed be possible where it is demonstrated that it is necessary to “achieve an acceptable scheme in all other respects” (PN2 Site 10, LB Lambeth Local Plan). The quoted 13 key development principles for the site are wide ranging and include:

1. Provision of a mixed and balanced community with an acceptable mix, tenure split/distribution of residential accommodation;
2. Provision of active frontages opposite the Black Prince Road Local Centre and along Lambeth High Street;
3. Protection of residential amenity;
4. Focus of employment uses in and around the viaduct and Lambeth High Street; and
5. Maximising the amount of replacement employment and provision of space for small and medium sized enterprises.

Along with re-providing the fire station, these are objectives that the development proposal achieves; by balancing maximisation of replacement employment floorspace provision against meeting other policy objectives. They are also objectives that would be difficult to achieve if, as noted by Policy PN2 Part O, buildings within the designated KIBA (the Central and East Sites) were proposed to be for a single land use. Furthermore, the principle of mixed-use development incorporating residential units on this site has already been accepted by the Appeal Inspector as appropriate in the Native Land appeal and is strongly encouraged by the NPPF, London Plan and CAZ SPG. To ensure a comprehensive approach is applied, an assessment of alternatives has been reviewed with LB Lambeth during the pre-application process. The alternatives are outlined within the Design and Access Statement (Section 2) and include:

1. Industrial - Conventional B2/B8 industrial spaces on the KIBA parts of the site (Central and East) with all residential outside the KIBA on the west site.
2. Office - Accommodating a large office building within the Central Site and mixed-uses on the West and East Sites.
3. Tall Building Office - With a mix of office and residential accommodation provided on the KIBA sites.
4 Office and Light Industrial - Providing hybrid employment floorspace on the KIBA sites through a mix of combination of B1 office space and B2/B8 light industrial space.

5 Alternative Use Value (AUV) - With new office buildings on the West, Central and East Sites together with the conversion of the Former Headquarters Building to provide a fire station and additional office floorspace.

6 Mixed-use - with employment and residential planned across each of the three sites.

7.39 These alternatives were also compared with the previous inquiry scheme, judged by the Appeal Inspector as acceptable in land-use terms, even though it was rejected for its adverse impacts on neighbouring properties on daylight/sunlight grounds.

7.40 Each alternative was considered for its employment potential (both within the KIBA and overall), its provision of housing including on-site affordable, its impact on the daylight/sunlight of neighbours and its heritage and public realm potential.

7.41 An alternative scheme for assessment of AUV has been developed in consultation with LB Lambeth and the GLA purely for financial viability assessment purposes. In simple terms, this is because an EUV plus a premium model would not have been appropriate for this scheme/site. It would not incentivise the landowner to release the site for development. This is justified in the Financial Viability Assessment. Whilst it does provide an increased theoretical employment level as compared to alternatives, it fails to realise the most beneficial redevelopment potential of the site (and thus does not deliver an efficient use of the land as required under the NPPF) by not delivering or maximising other required important planning requirements for mixed-use development (including substantial new housing (with affordable housing), culture, community services, public realm and permeability, and placemaking) which can all be provided through the high quality mixed-use redevelopment of the site.

7.42 Compared to alternatives, the now-proposed approach will genuinely deliver a wider range of community, placemaking, economic and employment benefits. In part, this package of benefits is capable of being delivered due to the increased viability of the proposed mixed-use approach compared to alternatives. The mixed-use approach and improved viability assists in:

1 Supporting a wider range of employment opportunities and inclusion of a dynamic employment hub which will support innovation - particularly with purpose-built smaller units for the needs of creative and cultural businesses, including low-cost and affordable employment space;

2 Additional homes, including an overall on-site affordable provision (35%) substantially greater than that of the appeal inquiry scheme (7%);

3 Additional public realm of over 1,900sqm, enhanced connectivity and the provision of a new London Fire Brigade Museum (over three times the area within the Native Land scheme);

4 The full restoration of the Grade II Listed 8 Albert Embankment and its Drill Tower, enhancements to their settings, to the setting of the adjacent Southbank House building and to the conservation area

5 Supporting delivery of a LFB Museum, consistent with the Mayors' Culture Strategy (2018) and LFB brief;

6 Creation of a new urban quarter with residential and commercial activity through the day and evening, increasing safety, securing, wayfinding and sense of place; and

7 Making efficient use of land and creation of a more balanced and mixed-use community, as required by the NPPF and set out in the Vauxhall SPD and Local Plan Policy PN2.
7.43 Together, these create the exceptional circumstances referred to within the Site 10 allocation and are welcome in any event in their own right to support continued regeneration within the Opportunity Area and CAZ.

7.44 Notwithstanding the conclusion here that exceptional circumstances have been demonstrated, if the decision maker were alternatively to find that such exceptional circumstances have not been demonstrated, the balance of other material considerations including the heritage and other public benefits is such that the proposal should still be found to be acceptable, in accord with the balancing envisaged within s38(6) of the Planning Act.

7.45 As outlined in Section 5.0, the significant heritage and public benefits of the scheme include:

1. Heritage - Restoration of two underused listed buildings, including partial re-use for original purposes, preserving the significance of the buildings in terms of their historic purposes and association and securing the buildings' long-term future;
2. Emergency Base - Creation of a new modern 'fit for purpose' firefighting and emergency services base for central London in a strategic location to achieve fast response times to increasingly-regular emergency incidents;
3. Fire Station - Provision of a fire station and LFB Museum that will facilitate LFB engagement with the local community;
4. Museum - Creation of a permanent home for the LFB museum, at its original site, resulting in educational and cultural benefits to the locality and wider London;
5. New Homes - Delivery of new housing, including 35% affordable housing;
6. New Residents - Helping to deliver a boost to the local economy through ‘first occupation expenditure’ of £2.3 million on goods and services, a proportion of which will be retained locally;
7. Resident Expenditure - Generating circa £3.9 million of additional resident expenditure in shops and services each year, in turn supporting 35 permanent FTE jobs in the local area;
8. New and Diverse Employment Opportunities - Creation of space for over 1,250 on-site jobs across a range of sectors (including medium, small and micro workspaces well suited to small creative and cultural businesses and start-ups) and creation of additional jobs during construction and from associated resident and occupier expenditure;
9. Economic Value - Generating £93 million of direct and indirect GVA per annum during the construction phase and £103 million of direct GVA per annum once the site is operational;
10. Business Rates - in excess of £1.7 million of business rates paid to LBL per annum;
11. Placemaking - Revitalising the local area through the introduction of active uses between Waterloo and Vauxhall;
12. Tourist Interest - Adding to and spreading tourism and leisure infrastructure along the river on South Bank through the provision of a new hotel and the re-instated museum;
13. Public Views and Access - Creation of a roof top restaurant offering public access to substantial river views;
14. Public Realm - Enhancements to public realm and wayfinding, including through provision of around 1,900sqm of high quality, permeable public realm (currently the site does not provide any public realm and the appeal scheme provided less than 600sqm);
15 Cultural - Provision of active uses on Newport Street complementing its attractiveness as a destination for arts and cultural uses and provision of the LFB Museum - a museum identified for delivery in the Mayor's Culture Strategy (2018);

16 Sustainability - Reuse of a largely-vacant brownfield building and land in central London;

17 Planning Obligations - Financial contributions towards the delivery of local infrastructure via the Community Infrastructure Levy (CIL) and s106 contributions.

**Employment Generation: Creating Diverse Employment Opportunities**

7.46 The NPPF, LBL Local Plan, London Plan, VNEB OAPF and Vauxhall SPD all support employment provision, with the London Plan (Policy 4.2) encouraging office developments to improve London’s competitiveness and enhance its provision for businesses of different types and sizes. The new draft London Plan maintains this approach, specifying that new provision, refurbishment and mixed-use development should support improvements to the competitiveness and quality of office space.

7.47 The uses on site currently employ approximately 130 people associated with Lambeth Fire Station (93 No.) and the temporary LFB Museum and Workshop (36 No.).

7.48 The proposals aim to create a new and much more substantial level of employment and commercial floorspace, delivering significant benefits to the local area in terms of job creation, services provision, placemaking and workspace units for MSMEs.

7.49 The Central site is the focus for the new employment floorspace and includes over 10,800sqm of business floorspace (Use Classes B1(a), B1(b) and B1(c)), made up of a broad range of employment opportunities for potential occupiers. In addition to the larger corporate office (Use Class B1(a)), U+I has adopted the terminology of micro, small and medium enterprises and collectively refer to these as MSMEs (Use Classes B1(a), B1(b) and B1(c)). The provision comprises:

- 9,123 sqm of corporate office floorspace - suitable for established businesses;
- 1,348 sqm of low cost medium workspace - suitable for MSMEs;
- 186 sqm of low cost small workspace - suitable for start-ups and MSMEs; and
- 142 sqm of affordable micro workspace - suitable for start-ups.

7.50 The B1 elements have been designed specifically to create a cluster for creative and digital industries; from start-ups to established businesses, fostering both collaboration and innovation.

7.51 Together, this employment space (including low cost medium and small workspaces and affordable micro workspaces) is anticipated to generate nearly 900 new jobs and will widen employment opportunities and support a diverse range of businesses. Including the other employment generating uses (i.e. the Fire Station, LFB Museum, hotel, retail, restaurant and gym) the proposal is anticipated to support approximately 1,250 jobs overall, including retaining all jobs associated with the Fire Station.

7.52 Informed by market evidence, consultation with the building’s current tenants and Vauxhall One Business Improvement District (BID) alongside the site’s partial location within a KIBA and within the CAZ, the proposed mix of employment uses has been designed to meet the needs of a wide range of occupiers whilst also creating a dynamic employment hub and strong sense of place to create a welcoming and engaging environment for employees, residents and visitors.

7.53 The office provision has been designed to support a range of businesses with potential to accommodate anything from co-working facilities for small creative and cultural businesses and
start-ups to larger employers looking for representation in this locality. Given the growing arts and cultural draw of the local area, it is anticipated that occupiers operating within the cultural and creative industries will be attracted to the site, benefitting from co-location alongside a wide range of employers and galleries.

7.54 Medium, small and micro workspaces will be delivered from the outset in units ranging in size from 20 to 428 sqm NIA, greatly differentiating these units from the corporate office with floorplates of typically c.900 sqm NIA. Each self-contained unit will have its own ‘front door’ onto the public realm, capable of achieving increased occupier identity and lower service charge costs compared to the corporate office and which will further reduce the MSME’s total occupation costs. The detailed design specification for the medium, small and micro workspaces has been informed by market research and developed in consultation with LB Lambeth. Whilst the fit-out of the workspaces will be subject to detailed design and occupier requirements, the design criteria are proposed to be secured via the s106 agreement. This will ensure the proposed workspace are suitable for intended occupiers and meet market expectations.

7.55 A strict application of the draft emerging policy-based approach would require 10% of the total floorspace (equating to 805 sqm NIA) to be made available for MSMEs at a 50% discounted rent (Draft Policy ED2). However, the proposed development offers the alternative of 20% of total office (B1) floorspace, 1,597 sqm NIA, as purpose designed and self-contained workspace units for start-ups and smaller companies.

7.56 Following dialogue with creatives and start-ups which are currently housed in the Workshop, the subsidised micro workspaces will be provided at an initial discounted rent of £15/sqft, with annual indexation for the first 15 years. In order to ensure that 10% of the B1 floorspace will be provided at low cost, two medium workspaces are also proposed to be provided at no more than 50% of the estimated rental value (ERV) of the corporate offices for the first 15 years following practical completion. The current ERV of the small and medium workspace units combined with the micro workspace discounted units equates to an average rent of £25.76/sqft. This is 46% less than the ERV of the corporate office of £56.08/sqft. A planning condition is also proposed to ensure the proposed rental levels.

7.57 Providing distinct and attractive self-contained units accessed directly from the public realm is central to the proposed placemaking strategy; it allows for more affordable and flexible tenure arrangements, with units having been designed to meet MSMEs’ requirements from the outset rather than retrofitted – and the approach adopted does not reduce the level of affordable housing that can viably be delivered.

7.58 The proposed approach thus provides in practice a better supply of affordable workspace than emerging policies of the draft new Lambeth Local Plan and London Plan.

7.59 Each of these office typologies is outlined below:

**Corporate Office**

7.60 Anchoring the Central Site, the large office space located within The Office building comprises 9,123 sqm (GIA) of floorspace, set over eight open plan floors (first to eighth) above a ground floor entrance lobby. The open plan floors range in size from 426 sqm to 1,114 sqm. The layout of the building has been designed to respond to the needs of occupiers by being flexible enough to allow the occupancy of single or multiple floors.

7.61 The typical office floor plate is planned with a side core arrangement and limited columns, suitable for a single tenant user or a multiple office tenancy. The side core on the south elevation also shields the open floor plate from solar gain. The workspace still remains well lit, as it is open for its full facade length on the north side, fronting the Central Garden. The modular
facade relates to the floor plan grid allowing for both cellular and flexible open plan work layouts that integrates with the vertical circulation link at the core.

7.62 Approximately 740 sqm of private and communal amenity space is provided for occupiers of the office, including roof terraces alongside shared internal amenity space. The shared space at eighth floor level includes larger meeting rooms suitable for a range of corporate functions such as seminars.

7.63 A dedicated shared ground floor lobby will provide access to all floors of the office building. A spiral cycle ramp provides access to a lower ground floor cycle storage area. This area includes changing rooms and a drying room, supporting employee health and wellbeing and meeting modern occupier requirements for such facilities. Cycle parking provision exceeds requirements, with 128 cycle parking spaces provided in relation to the corporate office.

7.64 Benefitting from a prominent address on Central Square and with surrounding active ground floor uses, it is anticipated that the accommodation within the corporate office will be occupied by established businesses requiring an ongoing or new presence in central London.

**Medium Workspaces**

7.65 The proposal includes four medium sized workspace units within The Office building.

7.66 These units have been designed to allow adaptability and flexibility should occupiers wish to occupy additional/less office floorspace. This creates opportunities for occupiers to take space ranging from 88sqm (i.e. the smallest ground floor medium sized workspace unit) to 857sqm (i.e. both levels of the medium sized unit located in the eastern part of the building), assisting in ensuring the longer-term retention of medium sized unit occupiers.

7.67 The medium sized workspace units are targeted towards SME occupiers (including start-up enterprises requiring grow-on space) and larger office tenants seeking space on a more flexible basis. Shared amenities and direct access onto the Central Garden at ground floor level will encourage collaboration and knowledge-sharing between occupiers, supporting the development of an innovation ecosystem.

7.68 Shared cycle storage, changing rooms and a drying room are proposed at lower ground floor level, supporting employee health and wellbeing and promoting sustainable travel behaviour.

**Small Workspace**

7.69 Fronting the Central Garden on the south side of the Whitgift Street Building, three self-contained ground floor small workspace units are also proposed. These range in size from 34 sqm to 74 sqm and provide workspace suited to the needs of MSME occupiers, especially those seeking to expand into self-contained accommodation.

7.70 External cycle storage is provided adjacent to these units alongside direct access onto the landscaped spine of the development (Central Garden) linking Whitgift Street and Central Square.

**Micro Workspaces**

7.71 Located at the base of the Eastern Garden Building, a total of 152 sqm of micro workspace floorspace is proposed. The micro workspaces comprise 3no. self-contained units of between 29 sqm and 60 sqm.

7.72 Incentivised space of this nature is in line with many inner-city regeneration projects in which a range of occupiers of varying sizes co-exist to create a collaborative community. On this basis,
the occupiers of these units are anticipated to benefit from the range of occupiers proposed as part of the wider scheme, including both MSMEs and large corporates.

7.73 To encourage take-up by start-ups, the micro workspaces are proposed to be let at a discounted rent, with rates set in consultation with existing tenants of The Workshop.

**Employment Summary and Economic Benefits**

7.74 Overall, the proposed B1 floorspace will provide flexible and modern employment space, with the potential to offer anything from facilities for smaller creative business and start-ups, up to larger employers looking for office space in the area. Together, this is anticipated to generate nearly 900 new jobs within the B1 employment floorspace alone.

7.75 The proposal will furthermore see the retention of all jobs associated with Lambeth Fire Station (93 jobs) and will also generate just under 300 new jobs associated with the hotel, LFB Museum, flexible retail floorspace, restaurant and gym - helping to create a diverse range of employment opportunities and vibrant atmosphere.

7.76 Overall, the proposal will thus contribute to policy aspirations by delivering approximately 1,250 direct jobs and supporting the target of providing over 25,000 new jobs in the Vauxhall SPD Area (PN2). This is equivalent to 5% of the entire new jobs target for the SPD Area.

7.77 In addition, the following employment benefits are also anticipated:

1. creating approximately 231 temporary construction jobs each year of construction at a range of skill levels;
2. supporting a further 1,000 jobs in services and other businesses from the wage spending of construction workers and supplier sourcing;
3. creating approximately 440 new jobs supported by occupiers of the employment uses through supply chains and wage spending;

7.78 In addition to the above, there will also be further economic benefits from the residents that move into the development. These benefits are beyond the scope of the socioeconomic assessment but are estimated below:

1. delivering a boost to the local economy through ‘first occupation expenditure’ of £2.3 million on goods and services;
2. generating an additional £3.9 million of resident expenditure per year, anticipated to support an extra 35 jobs in the local area; and
3. supporting additional on-site jobs associated with the general management, security, concierge, cleaning and maintenance of the new apartments and communal areas.

7.79 The construction and operational phases of the development will also contribute towards local economic output, as measured by GVA. Based on 2018 Experian data (which provides data on the GVA per worker in different sectors) and the proposed employment uses, it is estimated that the development will generate in the region of £93 million of direct and indirect Gross Value Added (GVA) per annum during the construction phase and £103 million of direct GVA per annum once operational.

7.80 In addition, the proposed non-residential uses will make an annual business rates contribution of more than £1.7 million to LBL.
Housing Provision

The current London Plan includes a requirement for housing delivery to be increased by at least some 30% through the Further Alterations to the London Plan (FALP) process as compared with previous requirements. In both cases, London Plan policies are expressed as minimum targets, recognising that they fall short of providing fully for objectively assessed housing need.

Whilst the incorporation of this increased target into the London Plan is a new statutory statement of strategic requirements, this has expressly not yet been taken into account in the Lambeth Local Plan, with its necessary commitment for an early review agreed with the EiP Inspector and incorporated into the Local Plan.

However, the intended early revisions are now to be delayed awaiting the full review of the London Plan, meaning that the necessary new balancing between employment and housing objectives has therefore not yet properly been taken into account in the balancing between historic employment policies and increasingly pressing housing delivery requirements.

Expressly, this means that the weight to be given to currently worded KIBA policy will clearly require reassessment to take into account the strategic need for substantially-increased housing delivery in Lambeth.

The existing Lambeth Local Plan housing target is for a minimum of 1,195 units per annum and seeks to “maximise the supply of additional homes in the borough to meet and exceed the annual housing target for Lambeth as set out in the London Plan” by taking full advantage of opportunities to deliver sustainable new housing.

However, the mayoral target for Lambeth has since increased the minimum housing supply target for the borough to 1,559 new homes per year - a 30% increase. This increase is reflected in the Draft Revised Lambeth Local Plan housing target, which seeks to increase the supply of housing by at least 15,890 net additional dwellings over the 10 years to 2028/29 (equivalent to approximately 1,589 units per annum).

The new draft London Plan (Policy H1) now seeks to again increase annual housing targets from 42,389 to 64,935 houses a year; representing an increase of 53% overall (Table 4.1) compared to the current London Plan (Policy 3.3). For LB Lambeth, the new draft London Plan suggests that the annual target for Lambeth is updated from 1,559 to 1,589 homes per year, representing a modest increase of just fewer than 2% - whilst still some 33% higher than the minimum target of the current 2015 adopted Lambeth Local Plan.

Against this backdrop, there is an overwhelming need to optimise development on appropriate sites (such as the 8 Albert Embankment) that are capable of making an important contribution towards the provision of housing, alongside the other employment, cultural and community objectives outlined above. This is reflected in the CAZ SPG (Table 1.1) and new draft London Plan (SD5 C) which affords equal weight to residential and other CAZ strategic functions within the VNEB Opportunity Area.

With specific relevance to the proposed development, the NPPF (para. 117) seeks to ensure that use of previously developed land is maximised and that planning decisions “promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively...” (para. 118).

Residential Density

In supporting the efficient use of land, the NPPF notes that decisions should have regard to: identified needs for different types of housing and other forms of development; local market
conditions and viability; the desirability of promoting regeneration and change; and the importance of securing well-designed, attractive and healthy places (Para. 122). The London Plan (Policy 3.4) aims to optimise housing delivery taking into account local context and character, design principles and public transport capacity.

The site is located in the VNEB Opportunity Area and benefits from a PTAL rating of 6a. The density matrix within the adopted London Plan indicates the appropriate density range as being 140-405 units per hectare (u/ha) and/or 650-1,100 habitable rooms per hectare (hr/ha). The London Plan cautions against applying the density ranges mechanistically, noting that site specific factors should be taken into account.

Calculating the density for the proposal in line with the methodology set out in the Housing SPG gives a density of 666 u/ha and 1,662 hr/ha. Whilst this represents higher density development above the typical ranges identified in the London Plan, the site falls within an Opportunity Area and is thus a location where residential output and densities should be maximised (London Plan Policy 2.13). It is also noted that there are continuing frequent approvals of schemes above the guidance maxima of the now-dated density table as the capital seeks to meet its housing requirements.

In line with the emerging new approach to residential density outlined in the draft London Plan (Policy D6 Part D), the number of proposed bedrooms per hectare is 1,068 br/ha and the number of proposed bedspaces per hectare is 1,983bs/ha.

As assessed below (and within the Design and Access Statement), the proposal is of high-quality design and provides an appropriate housing mix for the locality. The density is therefore considered acceptable.

We note that the new draft London Plan intends to delete reference to any density matrix and to replace it with (a better) reliance on improved design approaches.

**Housing Mix and Affordable Housing**

The Lambeth Local Plan targets the provision of at least 50% affordable housing where public subsidy is available - or 40% on sites where there is no public subsidy. It requires a 70:30 split between social/affordable rent and intermediate housing. In considering the nature of the affordable housing sought, the council will need to take into account (i) the specific circumstances of individual sites, including development viability, (ii) the characteristics of an area, the site and type of development proposed and (iii) the impact on mixed and balanced communities within a local neighbourhood (Policy H2).

The London Plan seeks to create mixed and balanced communities by providing a range of housing choice and tenures. London Plan Policies 3.10-3.13 relate to affordable housing and negotiation of provision on mixed-use schemes. Of note, it requires that the maximum reasonable amount of affordable housing should be sought having regard to a number of factors, including:

- The need to promote mixed and balanced communities.
- The specific circumstances of individual sites.
- Viability.

The London Affordable Housing and Viability SPG (2017) establishes the ‘fast track’ and ‘viability tested’ routes for assessing affordable housing provision, requiring that planning applications that provide less than 35% are supported by a Financial Viability Assessment (FVA). The SPG promotes the delivery of a range of tenures, including at least 20% low cost rent
(social rent or affordable rent) and at least 30% as intermediate products (with London Living Rent and/or shared ownership being the default tenures).

7.99 In accordance with the London Plan, LB Lambeth policy and Affordable Housing and Viability SPG, the development will indeed provide the maximum amount of affordable housing when taking into account overall scheme viability and will provide London Affordable Rent and London Living Rent homes.

7.100 The development proposes 146 affordable units (equal to 35% affordable by unit and 34% affordable by habitable rooms), with a tenure split of 56 shared ownership (equal to 38% by unit and 29% by habitable room), 90 affordable/social rented (equal to 62% by unit and 71% by habitable room). The affordable housing mix has been developed in collaboration with Notting Hill Genesis (NHG). NHG has specifically highlighted the demand for 1- and 2-bedroom units within LBL — resulting in the proposed affordable housing split limiting the number of larger units.

7.101 In summary, the housing mix is as follows:

Table 7.1 Proposed Housing Mix by Unit

<table>
<thead>
<tr>
<th>Size of Dwelling</th>
<th>Market Housing</th>
<th>Affordable Housing</th>
<th></th>
<th>Total</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Total Affordable</td>
<td>Shared Ownership</td>
<td>Affordable / Social Rent</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Studio</td>
<td>26</td>
<td>21</td>
<td>21</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>1 bed</td>
<td>117</td>
<td>56</td>
<td>26</td>
<td>30</td>
</tr>
<tr>
<td></td>
<td>2 bed</td>
<td>81</td>
<td>61</td>
<td>9</td>
<td>52</td>
</tr>
<tr>
<td></td>
<td>3 bed</td>
<td>47</td>
<td>8</td>
<td>0</td>
<td>8</td>
</tr>
<tr>
<td>Total</td>
<td>271</td>
<td>146</td>
<td>56</td>
<td>90</td>
<td>417</td>
</tr>
<tr>
<td>Percentage</td>
<td>65%</td>
<td>35%</td>
<td>(13%)</td>
<td>(22%)</td>
<td></td>
</tr>
<tr>
<td>Percentage of Affordable Housing</td>
<td>38%</td>
<td>62%</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

7.102 As explained in the FVA (undertaken by JLL), the proposed development has been identified for Marginal Viability Funding through the Government’s Housing Infrastructure Fund (HIF). Designed to deliver new infrastructure to support the delivery of housing, the funding would assist in unlocking the redevelopment potential of the site if awarded.

7.103 In line with the SPG and pre-application guidance from LB Lambeth and the GLA, this application is supported by a FVA. Notwithstanding the proposed affordable housing provision, the FVA demonstrates that the scheme is unable to support any further affordable housing beyond 35% by unit. It assesses the viability of the proposals and abnormal costs associated with the development, including the provision of Lambeth Fire Station and the works associated with the conversion and restoration of the site’s heritage assets. It is expected that the FVA will be the subject of an independent review on behalf of the Council.

7.104 This proposal therefore proposes a very significant uplift in affordable housing beyond that which was considered acceptable previously, providing an additional 127 no. affordable homes (146 no.) compared to the Native Land scheme (19 no.). Notwithstanding the different policy basis at that time, the Appeal Inspector concluded that the affordable housing provision was acceptable when taking into account the other important land use objectives for the site and viability.

*London Borough of Lambeth, Strategic Housing Market Assessment (2017)*
7.105 Overall, the proposed scheme incorporates a range of dwelling types and tenures, appropriate to its central location along Albert Embankment. It will assist in delivering a significant number of new homes, helping to achieve the housing delivery targets set out in the Lambeth Local Plan and the London Plan.

Heritage

7.106 It is well recognised that heritage assets typically degrade further when they are left vacant and/or underused.

7.107 The London Plan Policy 7.8, and LB Lambeth Policies Q20 and Q22 explain that development should identify, value, conserve, restore, reuse and incorporate heritage assets, where appropriate. Policy Q20 requires developments affecting a listed building to not diminish the buildings “ability to remain viable in use in the long term” and not harm the significance/setting (including views to and from) listed buildings.

7.108 Chapter 16 of the NPPF requires that, in determining planning applications, local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness of the historic environment (para.192) and the desirability of putting heritage assets to viable use (para.185).

7.109 The NPPF encourages Local Planning Authorities to look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to “enhance or better reveal their significance” (para.200).

7.110 When considering the impact of proposals, the NPPF requires great weight to be given to an asset’s conservation, that weight being commensurate with the importance of the asset. It notes that the significance of heritage assets can be harmed or lost through alteration or destruction of heritage assets or development within its setting (para.194).

7.111 In determining planning applications, the NPPF (para.185) states that local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality.
- The desirability of new development making a positive contribution to local character and distinctiveness.

7.112 As noted within the submitted Heritage Townscape and Visual Impact Assessment, whilst the Former Headquarters Building is noted to make a positive contribution towards the character of the Albert Embankment Conservation Area, the CMC Building and East Site clearly detract from the character of the conservation area. Overall, the Heritage Townscape and Visual Impact Assessment concludes that the development will have a positive effect on the Albert Embankment Conservation Area.

7.113 Again, the Heritage Townscape and Visual Impact Assessment concludes on an overall basis that there will be indeed a net beneficial effect on heritage assets and assesses the potential effects of the proposed development on above ground heritage assets. The conclusions of this and of the Archaeology chapter of the Environmental Statement are summarised below.
Below Ground Heritage Assets

7.114 The Archaeological chapter of the Environmental Statement and the Historic Environment Assessment identify that the West and Central Sites are within the North Lambeth Archaeological Priority Area (APA), while the entire site lies within the Albert Embankment Conservation Area (CA57) as designated by the London Borough of Lambeth.

7.115 The assessment identifies that the development has potential to impact upon buried archaeological deposits. It assesses the relative likelihood of archaeological survival across the site as being low within the where a basement is proposed within the West Site but high across the Central and East Sites and remainder of the West Site as these are largely without basements. Overall, the West and Central Sites are assessed as having the greatest archaeological potential, primarily from the remains of 18th and 19th century pottery manufactories and their associated waste dumps.

7.116 The Archaeological chapter of the ES explains that a watching brief was carried out on site during geotechnical investigations works in May 2017 in order to confirm the depths of natural deposits and the presence and extent of the former dock wall and buildings relating to Stiff’s London Pottery works. The watching brief confirmed the presence of the former Stiff’s pottery warehouse in the north of the West Site and uncovered possible evidence from the dock walls behind the existing redbrick basement walls.

7.117 A total of 14 further investigations have been carried out within the study area, comprising a mixture of evaluations, watching briefs and excavations. Eight of these investigations recorded evidence of pottery manufacture in the area dating from the 17th century through to the 20th century. Little archaeological evidence dating to earlier periods was recorded during these investigations, although prehistoric flint tools, a single shard of Roman pottery, medieval pottery, field boundaries/ditches and cultivation soil have been recovered.

7.118 The report notes that the proposals could potentially result in the loss of in situ archaeological remains.

7.119 Whilst the magnitude of change during the demolition and construction phase is assessed as being up to a Major Negative effect, this could be successfully mitigated through a programme of preservation by record, involving the full excavation of the proposed basement areas for well-preserved remains of high significance or a watching brief for poorly preserved remains. Following mitigation, the assessment concludes that the residual effect during demolition and construction would be reduced to negligible.

Above Ground Heritage Assets

7.120 As outlined in Section 6 of this statement, and below, the Heritage, Townscape and Visual Impact Assessment considers the effects on heritage assets within the development site, as well as those outside of it, the setting of which will be affected. Overall, the proposals would preserve or enhance the settings and significance of heritage assets, including having a positive effect on the Albert Embankment Conservation Area.

7.121 Whilst the physical condition of the Obelisk may prevent it from being relocated elsewhere within the site (as sought by Site 10 policy allocation), the intention is to re-provide it within the Central Square. Here it will be visible to the public, assist with wayfinding from across the site and provide a physical and long-term link to the site’s historical association with LFB. In addition, the new Obelisk will provide ventilation to the car park, reflecting its original intended purpose.
**Design, Townscape and Public Realm**

7.122 Good design is central to all objectives of the London Plan and LB Lambeth planning policies, drawing on NPPF guidance.

7.123 In the London Plan, good design is specifically promoted by the policies contained within its chapter seven and which address both general design principles and specific design issues.

7.124 Policy 7.1 sets out a series of overarching design principles for development in London. Policies 7.2, 7.4, 7.5 and 7.6 require all new development to be of high quality that responds to the surrounding context and improves access to social and community infrastructure, including in this case a publicly accessible gym (to include a swimming pool depending on operator requirements) and enhances the character, legibility, permeability and accessibility of the surrounding neighbourhood. Policy 7.7 relates to the specific design issues associated with tall and large-scale buildings.

7.125 LB Lambeth Local Plan policies Q5 and Q7 seek to create high quality urban environments and state that proposals will be supported where the design of development is a response to positive aspects of the local context and historic character.

7.126 Overall, the proposed design is of a high quality and will provide buildings that respond to local context and improve the current setting of heritage assets.

7.127 A more detailed assessment of each part of the site is provided below and further details are provided within the Design and Access Statement and Heritage, Townscape and Visual Impact Assessment.

**West Site - Responding to the Fire Brigade Headquarters**

7.128 The design of the West Site is led by the heritage context of the site, principally the Grade II listed Fire Brigade Headquarters, the Grade II listed Drill Tower and nearby Southbank House; which together influence the detailed design and massing of the proposed buildings.

7.129 The bulk, massing and footprint of the CMC building has influenced the design of the West Site, informing the location of the proposed new hotel extension building which has been stepped back to respect the Grade II listed Southbank House.

7.130 Whilst the CMC building is currently listed (in view of its connection to the Fire Brigade Headquarters and location within curtilage) Historic England’s listing description for the building (referred to as Lambeth Fire Station) notes that the “1980s rear extension is not of special interest”. At present, the CMC building clearly detracts from the setting of both the Fire Brigade Headquarters and Southbank House, obscuring views of the buildings from the west end of Black Prince Road and creating an abrupt junction between Lambeth High Street and Black Prince Road. It also detracts from the character of the Albert Embankment Conservation Area.

**Building A1 - The Fire Station**

7.131 The replacement fire station is proposed to be created through both a partial change of use within the Fire Brigade Headquarters and a new build component.

7.132 The new build component is to be located to the north of the Fire Brigade Headquarters, spanning east to west from Albert Embankment to Lambeth High Street and thus partially screening the large blank wall of the adjoining International Maritime Organisation building. It comprises a stepped building ranging from one to four storeys. The location of the building and its set back frontage aim to complement the Fire Brigade Headquarters, ensuring that the new
building will be subordinate to it and will leave clear views through from the River Thames to the listed Drill Tower.

7.133 The new Fire Station building is proposed to be linked from ground to second floor level with the listed Drill Tower and will be connected to the main listed building. To facilitate these linkages, the Obelisk, which was built in 1940 as a ventilation shaft for the underground bunker but was never used for this purpose and remains unused, is proposed to be removed and re-provided within Central Square.

7.134 The Drill Tower is proposed to be remodelled through partial demolition and alterations to facilitate connection with the new building and allow its continued use by the LFB for operational training purposes. The changes predominantly relate to the ground and first floors of the tower, with internal and more minor external fenestration alterations proposed to floors three to nine.

7.135 The new building will house: 24 firefighter gender-neutral rest rooms; a gym; lecture/TV area; kitchen; reception area and meeting room.

7.136 The lower levels of the new building will be comprised of brick, with the upper levels employing perforated metal screening and glazing. This choice of materials has been informed by the character of the surrounding area and seeks to complement the setting of the Fire Brigade Headquarters. Furthermore, the ‘light touch’ approach to materials aims to contrast with the solid masonry of the listed building and adjoining Drill Tower.

**Building A2 - The Listed Building**

7.137 As detailed in the Design and Access Statement, the Fire Brigade Headquarters will be repurposed through a change of use and alterations. It will host part of the replacement fire station, 73 residential units, a new rooftop restaurant and part of the LFB Museum.

7.138 The fire station is proposed to use the northern part of the ground floor, comprising four of the seven appliance bays adjacent to Building A1. This part of the Fire Station will house the appliance bays, public reception, community room, offices and equipment stores, with washdown and practice areas behind. The community room will provide community engagement facilities adjacent to the pedestrian access to the fire station in line with the London Safety Plan 2017 which promotes a community ethos for all stations.

7.139 The other three appliance bays and southern extent of the ground floor will be incorporated into the new LFB Museum, to be separated from the operational appliance bays by a glazed screen enabling visitors both to learn about the history of the LFB and to also see a modern Fire Station in use. The Memorial Hall is proposed to be incorporated within the LFB Museum and will be accessible to visitors of the museum.

7.140 The basement is proposed to be extended to provide the full LFB Museum, as well as plant space and access to the Central Site.

**Building A3 - The Hotel Building**

7.141 A new ten storey and roughly L-shaped building is proposed to be constructed in place of the CMC building to house the hotel, part of the LFB museum, part of the restaurant and 22 no. residential units.

7.142 The new building takes its scale and proportions from the listed Former Fire Brigade Headquarters. It is proposed to be set back from Black Prince Road and Lambeth High Street, thereby improving the setting of both the Former Fire Brigade Headquarters and Southbank
House and allowing for the creation of a more inviting and open public realm visible to the Embankment and acting as the key entry to the wider scheme.

7.143 The choice of materials (including brick and glazing) has been carefully selected to complement the Fire Brigade Headquarters, with the horizontal emphasis and alignment of fenestration being retained and with the detailing of the building being designed to be subordinate to the Fire Brigade Headquarters.

7.144 The upper floors will house a hotel lounge and conference room. A bridge link will connect to the proposed single storey restaurant extension above the main headquarters building. The glazed restaurant extension is designed to be lightweight and subordinate to the Fire Brigade Headquarters, whilst including an ancillary bar and café (at mezzanine level). The glazed extension respects the host building and responds to both the mixed character of Albert Embankment and local heritage.

7.145 At ground floor level, a flexible unit for retail or hotel use (Use Classes A1/A2/A3/A4/C1) is proposed on Lambeth High Street. Located adjacent to the hotel entrance it will activate the west side of the high street and could be occupied by either an independent operator or incorporated as ancillary hotel lobby space.

Central Site

7.146 The Central Site comprises four buildings:

1. Building B1: Central Square Building - a twenty-six storey building providing 138 new homes above a mix of uses;
2. Building B2: The Office Building - a stepped eight to nine storey office and workspace building with mixed ground floor uses;
3. Building B3: Eastern Garden Building - a twenty-four storey building providing 127 new homes above a mix of uses; and
4. Building B4: Whitgift Street Building - a five storey apartment building, stepped from four storeys, fronting Whitgift Street and providing 27 no. new homes.

7.147 The design of the Central Site responds to the surrounding heritage assets and residential buildings, including daylight and sunlight impacts on surrounding proposals. This approach arises from the selected diamond plan form of the taller buildings and the lower height and setback of the Whitgift Street Building and Office Building.

7.148 The buildings are arranged around three areas of public realm:

1. Central Square - an enclosed plaza fronting Lambeth High Street;
2. Central Garden - a new urban route between The Office Building and Whitgift Street Building; and
3. Eastern Garden - a triangular piazza formed at the base of the Eastern Garden Building providing access to the basement cycle store.

7.149 These areas of public realm, together with the re-provision of Obelisk within the prominent location of Central Garden, will assist in creating new routes, permeability and wayfinding through the site.

Principle of Tall Buildings

7.150 The principle of tall buildings on the site is supported by the London Plan (Policy 7.7), which encourages a plan-led approach to the location of tall buildings and generally supports tall
Policy 7.7 encourages urban design analysis to demonstrate that proposals for tall buildings form part of a strategy. The policy identifies a number of criteria that tall buildings should meet, including:

1. Only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building.
2. Relating well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level.
3. Individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London.
4. Incorporate the highest standards of architecture and materials, including sustainable design and construction practices.
5. Incorporate publicly accessible areas on the upper floors, where appropriate.
6. Have ground floor activities that provide a positive relationship to the surrounding streets.
7. Contribute to improving the permeability of the site and wider area, where possible.
8. Incorporate publicly accessible areas on the upper floors, where appropriate.
9. Make a significant contribution to local regeneration.
10. Not adversely affect their surroundings in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference.
11. Not adversely impact on local or strategic views.

The Lambeth Local Plan (Policy Q26) provides local level guidance on the location of tall buildings and their design, requiring them to: achieve design excellence; make a positive contribution to the townscape and skyline; be of the highest standard of architecture and design; and have no adverse impacts on the significance of strategic or local views or heritage assets including their settings.

Whilst Annex 11 of the Local Plan (taken from the Lambeth Tall Buildings Study 2014) identifies that the entire Vauxhall SPD Area falls within a location identified as being ‘sensitive’ to tall buildings, the design principles for the site (PN2 Site 10) state that the “heritage sensitivity of the site makes it inappropriate for tall building development” (criteria iv). Nevertheless, criterion ii) requires that any proposed development respects the silhouette of the headquarters building as viewed from across the river, intimating that taller buildings may be acceptable subject to heritage assessment. Informed by the shortcomings of the Appeal Scheme, this criterion is a central objective of the proposal.

The site falls within the Vauxhall SPD and VNEB OAPF. Guidance from both recognises the potential for taller buildings on the site and, more generally, along Albert Embankment and establishes a plan-led approach to the provision of new tall buildings. Indeed, the VNEB OAPF anticipates taller buildings along Albert Embankment of up to 80-90 meters in height. Whilst the OAPF does not clarify whether this is height above ground or AOD, the Vauxhall and Albert Embankment Tall Buildings Assessment (2018) assesses building heights against a maximum AOD height of 90m. The tallest proposed buildings are the Central Square Building and Eastern Garden Building with heights of 88.62m AOD and 81.64m AOD, respectively. Both the SPD and
OAPF require that tall buildings contribute towards the creation of a varied skyline and avoid appearing cumulatively as a “uniform wall of development” (OAPF p120) in strategic views.

7.155 Of relevance to the proposal, the emerging Draft Revised Lambeth Local Plan (Policy Q26) identifies the Central Site as being appropriate for tall buildings up to 90m AOD (in line with the OAPF). Annex 11 to of the Draft Revised Lambeth Local Plan confirms the revised approach is informed by further building height studies undertaken during 2018.

7.156 As identified below within the Heritage, Townscape and Visual Impact Assessment and within the Design and Access Statement, the detailed design of the taller buildings thus respects the heritage context of the site and will complement the silhouette of the headquarters building.

7.157 The regeneration context of the site, its inclusion in the CAZ and an Opportunity Area, supports it as a potential location for denser and taller development as a matter of principle. That planning context is a very important part of the townscape considerations.

**Tall Building Design**

7.158 The architectural design and appearance of the two taller buildings has been given careful consideration throughout the design process and has been informed by discussions with Historic England and design officers at both LB Lambeth and the GLA.

7.159 The proposal has also been informed by the design of recently constructed and consented developments along Albert Embankment. As set out in the Design and Access Statement (see chapter 1), the character of the area is evolving and now includes number of tall buildings of varied height and innovative design. The design of the proposed taller buildings on the site has been informed by this wider composition and has had regard to the previous proposals by Native Land.

7.160 The Design and Access Statement identifies the constraints and opportunities of the site and considers the approach of the Native Land scheme. Notably, the earlier appeal scheme comprised two tall buildings of 15 and 13 storeys but spanning north-south across the Central Site. When viewed from the River Thames and Albert Embankment, the buildings thereby created a ‘slab block’ appearance dominating the silhouette of the Former Fire Brigade Headquarters and conflicting with policy aspirations for a varied skyline – as well as affecting daylight standards along Whitgift Street.
In contrast to the appeal scheme, the Central Square and East Garden Buildings now take a diamond plan form, thus creating a more varied skyline and visual interest whilst also responding to the townscape, heritage and daylight/sunlight constraints of the site (see below). The more elegant form creates opportunities for extensive new public realm and better pedestrian experience at ground level.
The location, orientation and design of the taller buildings have been carefully adjusted to avoid any material impact on the strategic views from Primrose Hill and Parliament Hill which feature the Palace of Westminster as an important element. The locations of the taller buildings at each end of The Office Building have also been carefully and iteratively designed to respond to the heritage and daylight/sunlight constraints of the site.

As required by the London Plan, detailed consideration has been given to the design and impacts of the taller buildings, particularly in relation to the surrounding heritage assets and residential amenity.

Whilst (in this instance) the provision of publicly accessible areas on the upper floors of the taller buildings is not appropriate (due to their residential use), publicly accessible space will be created at the rooftop of the listed building and thus closer to the river. The buildings therefore respond to the criteria established by Policy 7.7.

In summary, the taller buildings:

1. Respond positively to the character of the area and surrounding buildings – through high quality architectural design, the proposed diamond-plan form, slender massing and choice of materials that sensitively relate to the silhouette of the listed Former Fire Brigade Headquarters – and preserve suitable levels of daylight and sunlight to surrounding properties;

2. Improve the legibility and permeability of the area by creating landmarks which will assist with wayfinding to and across the site from Albert Embankment;

3. Complement the new composition of taller buildings along Albert Embankment;

4. Relate positively at ground floor level - activating the public realm and assisting in the creation of well-defined public spaces and routes;
5 Contribute to the regeneration of the site and local area by facilitating: creation of a vibrant new employment, residential and cultural hub; provision of a new LFB Museum; and assisting to ensure the long-term preservation of heritage assets;

6 Are of high architectural quality and sustainable design; and

7 Will not have a significant harmful impact on any strategic, local or incidental views.

7.166 Overall, both the Design and Access Statement and the Heritage, Townscape and Visual Impact Assessments conclude that the taller buildings make a positive contribution to the skyline and complement the composition of taller buildings along Albert Embankment. The ES further confirms that the tall buildings will not generate residual significant adverse impacts on microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference.

East Site - Relationship with Newport Street and Black Prince Road

7.167 The East Site is separated from the Central Site by the raised main Waterloo railway line viaduct.

7.168 Its surrounding built context comprises lower density commercial and residential development. The immediate built context includes 2-4 storey buildings, with taller buildings (ranging between 5 to 13 storeys) in close proximity along Vauxhall Walk and Tyers Street.

7.169 The design of the Newport Street Building has therefore been informed by the more vernacular character of the surrounding townscape and draws on the design of Southbank House with a warehouse-style industrial language and with brick arches forming a visual link with the adjacent viaduct. The high-quality design and materials complement the character of the listed Southbank House, across the viaduct.

7.170 Located at the junction of Black Prince Road and Newport Street, the building will act as a wayfinder, marking the new riverside quarter and improving legibility. Its curved corner facade maximises presence on the street, thereby strengthening the connection between Black Prince Road Local Centre (to the south) and the growing cultural destination of Newport Street (to the north). Its set back from the street enables the pavement width to be substantially increased, providing enhanced and safer public realm and activating the street frontage.

7.171 The upper levels provide dual aspect homes across ten storeys and with amenity space provided at roof level. In total, the Newport Street Building will provide 30 no. affordable homes.

Townscape and Visual Impact

7.172 A Heritage, Townscape and Visual Impact Assessment (HTVIA) accompanies this application and reviews in detail the impact of the proposals on the surrounding townscape, heritage assets and the relevant protected views and other views.

7.173 Of relevance to townscape and visual effects of proposals, the NPPF encourages LPAs to look for opportunities for new development within Conservation Areas and within the setting of heritage assets to "enhance or better reveal their significance" (para. 200).

7.174 The London Plan recognises that a number of views make significant contribution to the image and character of London at a strategic level and seeks to protect their composition and character and their landmark elements. (Policy 7.11 and 7.12). The London View Management Framework (LVMF) SPG explains the application of these policies in further detail.
7.175 The Lambeth Local Plan (Policy Q25) seeks to resist harm to the significance of strategic views and secure improvements within them and to protect the composition and character of views of local interest.

7.176 The design of the proposed development is therefore a product of careful and continuous consideration of these requirements with the benefit of visual testing throughout the design process, including from its initial inception. This has been assisted by the extensive HTVIA work carried out in connection with the previous scheme and the Inspector’s decision and reasons.

7.177 As reported within the HTVIA, pre-application discussions with Historic England’s London Advisory Committee (LAC) took place in September 2018. Feedback supported the general approach to development and acknowledged that there is considerable scope for regenerating and improving the site and associated public realm. The subsequent response from LAC identified potential impacts to the setting of heritage assets and the Albert Embankment Conservation Area caused by the taller buildings, whilst acknowledging that the proposals fall within the height parameters of the VNEB OAPF. LAC also advised that a roof extension to the Former Headquarters Building could be accommodated and form a complementary high quality and modern element of the listed building that would sensitively integrate into the existing building.

**Townscape**

7.178 The townscape assessment identifies 11 townscape character areas of varying sensitivity and a plan of these is reproduced at Technical Appendix 1.1: Figure 1.4: Townscape Character Areas Plan.

7.179 These character areas include recognised heritage designations and have been defined in relation to their characteristic uses, physical traits and building types and forms. The Assessment identifies that, overall, the proposals deliver a net townscape benefit.

7.180 The net benefit judgement reflects the fact that the Albert Embankment (Character Area 7) and Millbank (Character Area 10), which are experienced by many receptors, would experience a Minor to Moderate Beneficial improvement and that other areas, Lambeth High Street notably and Whittgift Street (within Character Area 1a), would also experience a Moderate Beneficial improvement.

**Visual Impact**

7.181 The extensive visualisation analysis, including views of the proposed development at night, demonstrates that the medium to distant visual impacts are limited in nature and are either minor adverse or neutral to moderate beneficial in their effect. This results from the limited magnitude of change, particularly considered in the context of existing new tall development and consented development in the wider area and which provides a context for the taller element of the proposed development.

7.182 The proposed development has been carefully designed to avoid any material impact to background in the strategic views from Primrose Hill and Parliament Hill and which feature the Palace of Westminster as an important element. The proposals would have no material impact on the background to those views and would not limit the ability to see and appreciate any part of the Palace.

7.183 In assessing the visual impact of the proposals, regard has been had to the high architectural quality of the development, including careful consideration of design and materials. Given there is no demonstrable significant harm to a designated or non-designated asset, it is the correct approach to give full weight in the assessment to the proposed high design quality.
7.184 The extensive visualisation analysis undertaken demonstrates that visual impacts are limited in nature and are considered minor adverse to moderate beneficial.

7.185 Of note, the HTVIA concludes that the rooftop extension to the Former Headquarters Building would act as a visual expression of a new chapter in the building’s history, reinforcing its prominence as a landmark on the Albert Embankment. In views across the River Thames, from Victoria Tower Gardens, the HTVIA concludes that the glazed extension will subtly offer the building greater prominence along Albert Embankment, particularly in the context of neighbouring tall development which has reduced the visual prominence of the listed building. In accordance with the conclusions of LAC, the extension will therefore act as a complementary and modern addition that will sensitively integrate into the existing building.

7.186 For the reasons set out above, the proposal therefore accords with the London Plan Policies 7.11 and 7.12 and Local Plan Policy Q25.

7.187 In addition, the proposal will remove the CMC Building and enhance and better reveal the significance of Southbank House through carefully considered and high-quality design and siting, both in accordance with the aims of the NPPF (para. 200).

**Public Realm**

7.188 The London Plan (Policy 7.5) states that new development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way. It also notes that the treatment of public realm should be informed by heritage context.

7.189 The Vauxhall SPD (Figure 4.30) identifies opportunities for the site to provide new public open space and highlights two suitable spaces adjacent to Lambeth High Street and the railway line.

7.190 However, the site currently makes no contribution to public realm or open space, being publicly inaccessible and providing no opportunities for through routes within any of its three parts.

7.191 Across the site, the proposal therefore now seeks to deliver the following substantial new areas of public realm:

1. Extension and improvement of the public realm between the West and Central Sites through the provision of a new public space at the southern end of Lambeth High Street (South Square), offering an improved setting to the listed Southbank House;

2. Creation of a public squares to the west (Central Square) and east (Eastern Garden) of the Central Site, together with a wide and attractive connecting pedestrian route (Central Garden);

3. Associated hard and soft landscaping and public realm improvements throughout the site.

7.192 Linked by a shared surface, South Square and Central Square will create a smooth transition and gateway from Albert Embankment through to Lambeth High Street and the new urban quarter beyond, with active uses around it.

7.193 These areas of public realm have been designed to provide a variety of more civic (South and Central Squares) and local (Eastern Garden) spaces and are central to creating a successful employment destination and creating an area that works well for residents, employees, visitors and the local community.

7.194 Together, these public works will create over 1,900 sqm of substantial new public realm and open space, representing 18% of the application site area. This, and the re-provision of the Obelisk within a prominent part of the site (Central Garden), will greatly enhance public realm,
wayfinding and placemaking within the site and surrounding area, knitting the urban form into the surrounding area and providing new routes across the site to encourage walking and cycling.

Further details of the proposed public realm and landscaping are set out in the Public Realm Strategy and Design and Access Statement.

**Culture and Tourism**

The draft London Plan promotes the unique concentration and diversity of tourism functions within the CAZ (Policy SD4) and notes that arts, culture, tourism and entertainment activities make a vital contribution to London’s culture and heritage - ensuring London is an attractive place visit.

The CAZ SPG confirms that cultural, tourism and entertainment activities are integral to the function of the distinctive character of the CAZ and its mix of uses. Specifically, cultural tourism is acknowledged to play a significant part in London’s economy, with GLA research (2015) estimating that “tourism attributable to cultural activities and services helped to support 80,000 jobs, £7.3 billion in expenditure and £3.2 billion in gross value added (GVA) during 2013”.

The Mayor’s Culture Strategy further recognises the value of tourism and culture for the London and notes that over 31.9m people visited London in 2017.

The proposed hotel, restaurant and LFB Museum will assist in promoting tourism and providing visitor facilities in London, complementing the Mayor’s Culture Strategy and objectives set out in the London Plan. The hotel will also complement the proposed employment floorspace by providing visitor accommodation suitable for both business and leisure visitors. Similarly, the restaurant will provide an attractive new facility for both client entertainment and tourists alike.

**Hotel**

The GLA Economics Working Paper No. 88 confirms that London has the highest occupancy rate in serviced accommodation across all major European cities and the fourth highest prices for hotel rooms. The GLA’s projections therefore suggest that London will need to add an additional 58,140 rooms to the serviced accommodation supply by 2041, at an average of 2,236 rooms per annum.

The London Plan Policy 4.5 confirms the Mayor’s support of London’s visitor economy and the requirement to stimulate its growth through improvement to the range and quality of provision. Within the CAZ, strategically important hotel provision is directed towards Opportunity Areas (such as here), making the hotel’s proposed location acceptable in principle.

The Lambeth Local Plan (Policy ED12) also notes that hotels will particularly be supported in the CAZ and London Plan Opportunity Areas. It requires that all visitor accommodation: provides off-street pick-up and set-down points for taxis and coaches; meets the highest standards of accessibility and inclusion; and not unacceptably harms the balance and mix of uses in an area.

The 10-storey hotel as now proposed as part of the mixed-use development is therefore supported as being within the CAZ in line with the objectives set out at Policy ED12 of the Lambeth Local Plan.

Whilst the submitted drawings identify 143 bedrooms, the Design and Access Statement explains how the hotel has been configured to allow flexibility for the provision internally of up to 200 bedrooms. This can be achieved within the same footprint of the proposed hotel buildings and would only require changes to the room and window layouts of the hotel. The
proposal for between 143 to 200 hotel bedrooms thus provides flexibility for the hotel to respond to prevailing market demands at the time of implementation. Similarly, the flexible hotel/retail unit adjacent to the hotel entrance allows for the space to be occupied by the hotel operator or an independent retailer/restauranteur operator.

7.205 For assessment purposes, the impact of the larger 200-bedroom hotel and provision of a retail unit has been tested.

7.206 In accordance with the Lambeth Local Plan, a minimum of 10% of rooms are proposed as wheelchair accessible.

**LFB Museum**

7.207 The London Plan encourages new visitor attractions in appropriate locations (Policy 4.6) and the Lambeth Local Plan (Policy ED11) promotes cultural facilities in the CAZ and Opportunity Areas. The Mayor’s Culture Strategy also specifically supports delivery of a new London Fire Brigade Museum at the Fire Brigade Headquarters by 2023 (page 63 and Policy 3).

7.208 The Local Plan requires that proposals for new attractions demonstrate in a visitor management plan how the potential impacts of visitors will be managed, including through short and long-term on-site coach parking.

7.209 Historically, the 8 Albert Embankment site included a London Fire Brigade Museum which was demolished to make way for the construction of the CMC Building. In 1966, the museum moved to Winchester House in Southwark, where it operated until the doors closed in September 2015 in preparation for its intended move back to the Lambeth site - the opening of a new museum was nevertheless delayed by the refused application and dismissed appeal.

7.210 In November 2016, work began on the conversion of the Workshop to provide a temporary home for the LFB museum. Since then, the museum has proved to be a well-visited visitor attraction and focus for events. Alongside The Workshop, it has welcomed over 48,500 visitors since opening in November 2016. The temporary use for events and the LFB Museum currently expires on 31 December 2019.

7.211 The proposals for 8 Albert Embankment will now create a permanent home for the LFB Museum, relocating it to its original location within the Former Headquarters Building. It will provide a unique insight into the history and operations of the LFB, directly alongside the operation of the new modern fire station.

7.212 The layout of the museum has been flexibly designed to allow a range of exhibition space configurations and includes facilities for school groups. The museum will support local education and public safety, as well as reinforcing the growing cultural destination in this part of the borough.

7.213 The Museum will also help to extend the length of the area of more intensive tourist visitation along the South Bank, to the benefit of those parts further north.

7.214 In accordance with Policy ED11, parking within the Central Site and along Whitgift Street and Lambeth High Street will provide short and long-term parking facilities for the museum, including coach parking suitable for school visits.

**Transport, Servicing and Parking**

7.215 The London Plan (Policy 6.3) requires that development proposals should ensure that impacts on transport capacity and the transport network are fully assessed with development proposals not adversely affecting safety on the transport network. The new draft London Plan (Policy T4)
maintains this approach, requiring that impacts on transport network capacity are assessed at the local, network-wide and strategic level.

7.216 A Transport Assessment has therefore been undertaken by WSP. This assesses the proposals against policy and confirms that the local residential road network which serves the site does not present any significant problems for access either for vehicular or pedestrian traffic. Albert Embankment, whilst subject to higher traffic volumes, has traffic signal control in operation allowing for traffic flows to be regulated suitably, ensuring that there are no significant road safety issues.

**Transport and Servicing**

7.217 In order to mitigate any minor increase in traffic on Lambeth High Street and Whitgift Street, the proposed development will incorporate additional pedestrian crossings, shared surfaces and new pedestrian space to alleviate a very small increase in vehicular traffic through the encouragement of pedestrians to use the space.

7.218 This is in accordance with the aims of Policy T1 of the Lambeth Local Plan, which specifies that the council will promote a sustainable pattern of development in the borough, and promote sustainable, healthy travel behaviour.

7.219 As agreed with TfL, the Transport Assessment appraises the capacity of the following junctions:

- Albert Embankment at Black Prince Road (signal controlled T-junction); and
- Lambeth Road at Lambeth High Street (priority controlled T-junction).

7.220 The Transport Assessment concludes that the impacts of the proposed development on these junctions are low and that the traffic impacts are unlikely to be material.

7.221 The servicing and delivery strategy for the development is based on the provision of four additional off-street loading bays within the Central Site. A shared coach drop-off/loading bay is proposed on-street on Whitgift Street. This is anticipated to accommodate approximately 12 coaches and 84 service vehicles per day; the Transport Assessment concludes that this demand can be accommodated within the proposed Whitgift Street bay. Coaches using this bay will arrive via Lambeth High Street, routing one-way through the Central Site via the peripheral shared surface route to access the Whitgift Street drop-off bay. Coaches will park off-site at designated coach parking areas (the nearest being on Albert Embankment).

7.222 All five proposed loading bays will be provided with passive provision for electric vehicles to provide charging points in the future.

7.223 All other service vehicle activities are contained off-street within the Central Site and the Transport Assessment accordingly concludes that there is not forecast to be any adverse impact on the efficiency or safety of the local road network. Within the Central Site, service vehicles will follow the dedicated one-way shared surface peripheral route through the site operating from Lambeth High Street to Whitgift Street.

7.224 The flexible commercial unit within the East Site is proposed to be serviced via an informal servicing bay located on Newport Street. The Transport Assessment considers the servicing requirements of the wide range of proposed uses (A1-A4, B1, D1 and D2). It concludes that the unit could either be informally serviced from Newport Street (if in B1, D1 or D2 use) or via a 'half-on half-off' servicing bay (if in retail use). As requested by LB Lambeth, a Stage 1 Road Safety Audit assessing the road safety implications of on-street servicing will be undertaken and submitted to LB Lambeth during the course of determination.
7.225 A detailed service and delivery management plan (to be controlled by condition) will ensure that the proposed strategy is appropriate and will not adversely affect the highway network or residential amenity. A Framework Delivery and Servicing Plan has been submitted with the application and will be further developed once the tenants of the commercial units have been identified.

7.226 Level of Comfort (LOC) assessments demonstrate that pedestrian demand can be accommodated by the proposed public open spaces and existing network. The Transport Assessment also identifies that public transport facilities and the local road network are sufficient to serve that anticipated to be generated by the development.

7.227 To improve accessibility and pedestrian safety, a new pedestrian crossing point will be introduced on Whitgift Street – linking the Central Site to Old Paradise Park. Other highway works include provision of an enhanced pedestrian environment along Lambeth High Street between Black Prince Road and Whitgift Street, to improve public realm and crossing opportunities.

7.228 These works, and any other highway works identified in the Transport Assessment and ES (Chapter 7), will be secured through a combination of section 106 and section 278 works.

Parking

7.229 The application site has an existing marked parking provision of 74 car parking spaces, plus 5 large vehicle parking spaces (within the Fire Station Drill Yard). The large vehicle parking spaces are used for London Fire Brigade operational purposes (capacity equal to 5 large fire appliances or a total of 15 cars). The maximum marked parking provision on the application site is effectively 74 + 15 = 89 cars. In addition, the Newport Street site was historically used for parking associated with Lambeth Fire Station providing some 22 on-site car parking spaces. Accordingly, whilst the site currently provides 74 marked car parking spaces the maximum/historic car parking provision associated with the application site is 89 + 22 = 111 cars.

7.230 The proposed development now reduces the on-site parking provision to 93 spaces from the historic maximum, of which 50 will be wheelchair accessible or Blue Badge spaces.

7.231 In terms of accessible and disabled car parking, five blue badge parking space will be provided at street level street within the site application boundary; one for each of the office, hotel, museum, retail and gym uses (No. 5 total). In addition to these blue badge spaces, one additional blue badge/car club space is proposed on Whitgift Street, outside of the application boundary, and the reconfiguration of Whitgift Street will retain the existing on-street disabled bay (No. 2 total). The fire station will also be served by one accessible bay.

7.232 Limited parking to serve the residential uses is accommodated within a basement car park in the Central Site. This contains 78 car parking spaces on two levels providing 42 wheelchair accessible spaces and 36 residential parking spaces, representing a low parking ratio of 0.19 spaces per unit. Taking account of existing marked parking provision (89 spaces) and the previous car park use of the East Site (22 spaces), the proposed provision represents an overall net 16% reduction in on-site parking spaces (from 111 to 93 spaces).

7.233 In excess of current requirements, all standard residential car parking spaces will be provided with active electrical vehicle charging points, with all other basement car parking spaces being provided with passive provision to allow connection in the future. As reported in the Transport Assessment, the 36 non-wheelchair accessible residential parking spaces will also solely be used by Ultra Low Emission Vehicle. This will ensure compliance of these spaces with the Ultra Low Emission Zone and alignment with the aims of reducing the most harmful emissions generated...
by road traffic in central London. The proposed car parking for the residential units complies with the current London Plan, (Policy 6.13), Lambeth Local Plan (Policy T7) and VNEB OAPF (para. 8.25 of Lambeth Local Plan) – which requires residential car parking provision to be significantly less than 1 space per unit or (within the VNEB Opportunity Area) average a ratio of 0.20 parking spaces per unit.

The proposed car parking provision (ratio of 0.19) is also commensurate with the residential car parking provision of similar, recently approved application in LB Lambeth, including:

1. ITV Studios (17/03986/FUL) - approved ratio = 0.16
2. Phase 2, Keybridge House (17/05311/EIAFUL) – approved ratio = 0.21
3. South Lambeth Estate (17/05993/OUT) - approved ratio = 0.20
4. Texaco, 36-46 Albert Embankment (16/00795/FUL) - approved ratio = 0.25
5. Dumont, 22-29 Albert Embankment (14/04757/FUL) - approved ratio = 0.40
6. Merano, 27-29 Albert Embankment (13/02347/FUL) - approved ratio = 0.25
7. Corniche, 20 Albert Embankment (12/04422/FUL) - approved ratio = 0.41
8. Eastbury House, 30-34 Albert Embankment (12/01768/FUL) - approved ratio = 0.25

It is noted that the emerging new draft London Plan (T6.1) seeks to introduce a significant step-change in policy by requiring developments within the CAZ, Inner London Opportunity and/or with a PTAL of 5-6 to be car-free.

Notwithstanding this emerging policy requirement, the proposed residential car parking provision is intended to remove potential overspill parking on surrounding streets. It is also to ensure that parking stress does not compromise access to Lambeth Fire Station - which importantly requires clear 24hr access, with this unique requirement being managed appropriately via the proposed development.

As explained within Appendix I of the Transport Assessment, the proposed quantum of car parking provision also seeks to respond to the accessibility of the site – which whilst benefitting from a PTAL of 6a is not as well connected as other centrally located sites.

The provision of off-street residential parking within the Central Site basement is also supported by viability evidence, as set out in the Financial Viability Assessment. This demonstrates that the revenue and speed of sales supports the proposed quantum of affordable housing and that this will be adversely affected if residential car parking provision for the larger units for sale cannot be provided.

Parking provided in the Fire Station Drill Yard (the courtyard created between the Listed Building, hotel and new fire station building) provides five large vehicle parking areas for operational purposes. This is equal to five large fire appliances or a total of fifteen cars. These parking spaces are associated with the fire station and are independent of the parking spaces provided within the Central Site.

No off-street parking is proposed for the East Site and no off-street vehicular access is proposed.

Taxis will drop-off and pick up from Lambeth High Street adjacent to the Central Square Tower and a two-bay taxi rank will serve the hotel and museum land uses. Both taxi bays will be provided with active electrical vehicle charging points. A vehicle drop-off is also proposed on Albert Embankment at the public entrance to the fire station and may also be used by taxis.

In total, 1,036 cycle spaces are proposed for the site, comprising 885 long-stay spaces and 151 short stay spaces. The long stay cycle spaces are proposed in secure and covered locations.
within the site and the short stay spaces are proposed at easily accessible on-street locations. Lockers, showers and on-site changing facilities have also been incorporated into the design of the proposals to further encourage cycling.

Acknowledging the site’s suitability for promoting cycling, the proposed cycle parking facilities meet and exceed the minimum requirements of the London Plan (Policy 6.9) and comply with the emerging standards set out in the Draft New London Plan (Policy T5).

Framework Employee and Residential Travel Plans are submitted with the planning application. These documents seek to encourage sustainable travel and include clear objectives and targets to achieve this overarching aim. The Travel Plans will constitute a living document that will be updated and reviewed over the course of the development.

Overall, the Transport Assessment demonstrates that the proposed development will not adversely affect the highway and considers that the proposed parking provision is acceptable and necessary to the overall scheme, being in accordance with the aims of the London Plan and local planning policy.

**Landscaping, Ecology and Trees**

A Phase 1 Habitat Survey of the site has established that the site is of limited ecological interest and that there is a limited scope for development to cause negative ecological impacts. Accordingly, it is possible for the proposed development to result in a net positive impact on biodiversity.

In order to achieve this, the following measures recommended by the Phase 1 Habitat Survey will deliver benefits for wildlife in accordance with the strategy of the London Plan Policy 7.19 and Lambeth Local Plan Policy EN1 to take advantage of opportunities to deliver positive gains for nature through the layout, design and materials of the development:

1. Tree planting and other soft landscaping at the site using species that have known benefits to wildlife;
2. Bird boxes to be installed at suitable locations;
3. The installation of green roofs.

These approaches have been incorporated into the landscaping proposals, which propose extensive hard and soft landscaping across the site, including:

1. Creation of a green wall on the centre of the south elevation of the Whitgift Street Building to frame the Central Garden;
2. Installation of bat, bird and bug boxes/units;
3. Tree planting throughout the site, including the creation of a run of tree planters along the length of the Central Garden; and
4. Implementation of green/brown roofs on the upper levels of the buildings.

Overall, extensive areas of hard and soft landscaping are proposed across the site at ground, lower ground and roof level, offering a substantial improvement for a site that currently has no formal landscaping.

An Arboricultural Assessment confirms that the only part of the site which contains trees is the East Site, where three self-seeded multi-stemmed trees are present. The assessment identifies that they are of poor quality (Category C) and that their removal is therefore acceptable.

Overall, the landscaping proposals will provide a material uplift in the ecological value of the site.
The proposals therefore provide positive contributions though significantly improved landscaping across the site, creating benefits for local wildlife subject to the implementation of appropriate avoidance and mitigation.

**Energy and Sustainability**

Chapter 5 of the London Plan sets out the approach to climate change and requires development to make the fullest contribution to minimising carbon dioxide emissions. Policy 5.2 sets a target for zero carbon non-domestic buildings by 2019. The new draft London Plan seeks to confirm this target (para 9.2.5) and notes that to meet the zero carbon target, an on-site reduction of at least 35% beyond the baseline of part L of the current Building Regulations is required.

The proposals optimise the use of previously developed land in a highly sustainable location.

The design incorporates the principles of sustainability early on in the design process to ensure that the use of material and construction methods are suitable in meeting the requirements of policy

It is noted that changes in GLA guidance (October 2018) with updated carbon emission factors enforced from January 2019 has significantly impacted the carbon efficiency/viability of the proposed energy strategy. Accordingly, the energy strategy has evolved away from combustion technologies such as CHP and boilers towards highly efficient electrically based systems.

The Energy Statement identifies the following measures which seek to maximise carbon savings:

1. A highly efficient building fabric
2. Efficient building services plant, including providing high efficiency air handling plant with heat recovery and low specific fan power.
3. 100% low energy lighting and maximised use of LED and low energy fixtures.
4. Heat and cooling networks provided by ASHPs, WSHPs, high efficiency WCC and high efficiency boilers serving the West and Central Sites
5. High efficiency VRF system providing heat and hot water to the East Site
6. Roof mounted PV panels.

Overall, the Energy Strategy confirms that a 52.5% CO2 reduction is achieved over the Building Regulations Part L 2013 baseline utilising SAP 10.0 carbon factors.

As well as the development as a whole exceeding the minimum carbon reduction target of 35% set by the GLA, the residential (63% carbon reduction) and non-residential (46.1% carbon reduction) elements also meet the targets for zero carbon homes and 35% CO2 reductions for commercial developments. Residential elements have maximized efforts to achieve targets set by Lambeth and the GLA (zero carbon homes). As explained within the Energy Strategy, investigations into further methods to reduce energy consumption and carbon emissions have been undertaken and have shown that these are not feasible. A payment in lieu of the shortfall in carbon reductions will therefore be made to Lambeth.

Carbon offsetting will be calculated and paid on completion of each construction phase in accordance with an updated Energy Statement for that phase. This will be secured through the s106 Legal Agreement.

In order to comply with Policy EN4, pre-assessments have been conducted which confirm that it is feasible for all new build, non-residential elements of the development to achieve BREEAM Excellent.
7.262 The Sustainability Statement demonstrates that for those parts of the development which are proposed to be refurbished (i.e. the Former Headquarters Building), it is not technically feasible to meet ‘Excellent’ standard. Rather, these areas will instead target a minimum of BREEAM rating ‘Very Good’ with a scope of achieving the 63% threshold, thereby meeting the required target of Policy EN4 b(ii). Additionally, all new build residential elements of the development are targeting Home Quality Mark ‘3 Star’ rating.

7.263 The Sustainability Statement outlines that the proposed development aims to maximise opportunities for water efficiency, which include the use of water saving fixtures and fittings, reduced water flow rates and the installation of water meters to all residential units. Additionally, all residential units will be designed to meet a water consumption rate of 105 litres per person per day.

7.264 In accordance with Policy EN7, a Waste Management Strategy has been produced. This, together with the Sustainability Statement, identifies that construction waste and waste created through the operation of the development are sought to be minimised in accordance with the waste hierarchy and sufficient internal space for the storage, recycling and composting of waste has been incorporated for all proposed uses.

7.265 The Sustainability Statement confirms that the proposed development has been carefully designed to take the likely impacts of climate change into account. The incorporation of SuDS, brown roofs and other sustainability measures will reduce the water demands of the development and manage it as close to its source as possible. The proposed development also includes some planting to combat the effects of climate change; incorporates solar control glazing to reduce reliance on air conditioning systems and effective ventilation to reduce internal heat gains.

7.266 Due to the site’s accessible location, the proposed development takes opportunities to encourage transport by non-car modes and provides 1,036 cycle parking spaces to encourage sustainable modes of travel. Lockers, showers and on-site changing facilities are incorporated into the design to further encourage this and no car parking spaces are proposed for the office, hotel and retail occupants. The Transport Assessment also includes a Travel Plan which will encourage and maximise the use of sustainable travel options available in the vicinity of the site.

7.267 Notwithstanding the evolving Energy Strategy, the proposed development has been designed to be highly sustainable and maximise the potential carbon savings that can be achieved in accordance with the aims of the NPPF, London Plan, the Mayor’s Sustainable Design and Construction SPG and Lambeth Local Plan.

**Amenity**

**Internal Space Standards**

7.268 The Design and Access Statement demonstrates that all residential units meet or exceed the requirement of the Nationally Described Space Standards (2015) and the Housing SPG (March 2016).

**Daylight and Sunlight**

7.269 The London Plan Policies 7.6 and 7.7 state that buildings and structures should not cause unacceptable harm to the amenity of surrounding land uses and buildings, including in relation to overshadowing and reflected glare.

7.270 Whilst related to areas where is an existing or anticipated shortage of land for meeting identified housing needs, the NPPF (para. 123) confirms that “local planning authorities should refuse
application which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”

7.271 The Housing SPG provides further guidance to Policy 7.6 and notes that an appropriate degree of flexibility needs to be applied when using the BRE Guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. It recognises that BRE guidelines “should be applied sensitively to higher density development, especially in opportunity areas... where BRE advice suggests considering the use of alternative targets”. Such alternative targets should take account of “local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time” (para. 1.3.46).

7.272 The Housing SPG (at para. 1.3.46) also notes that:

“The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.”

7.273 Lambeth Local Plan Policy Q2 states that developments will be supported where they meet a number of amenity criteria, including (iv) not having an unacceptable impact on the levels of daylight and sunlight on the host building and adjoining properties.

7.274 The approach of the earlier Appeal Scheme is an important material consideration in the determination of this planning application, having been dismissed on the ground of impacts on daylight/sunlight alone.

7.275 The accompanying Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution chapter of the ES (Chapter 14) assesses the likely effects of the proposed development. The assessment considers the likely significant effects in terms of:

1. Daylight and sunlight amenity to the residential properties that surround the site.
2. Overshadowing to gardens, amenity areas and open space around and within the site.
3. Light spillage to residential properties that surround the site.
4. Incidents of solar dazzle at key junctions that surround the site.
5. Daylight amenity within the residential elements of the proposed development.

7.276 Overall, and in summary, the assessment concludes that the proposed development is likely to have limited effects in terms of daylight, sunlight, overshadowing, solar glare and light pollution, such that the residual effects are no greater than minor to moderate negative effect.

7.277 In respect of daylight amenity, the ES concludes that daylight amenity to all neighbouring receptors is considered to be commensurate with a dense urban location and (in accordance with the London Plan and Lambeth Local Plan) is not considered to have an unacceptable impact on the amenity of surrounding land uses.

7.278 A Daylight and Sunlight Overview Report has also been produced to consider and compare the daylight/sunlight impacts of the proposed development with the 2010 Appeal Scheme.
In summary, the effect of the construction upon the daylight amenity to the majority of the surrounding residential windows and rooms is considered to be negligible on the basis that the daylight amenity alterations are fully compliant with the advisory numeric levels set out in the BRE guidelines. The report explains that occupants of these rooms are unlikely to notice any material alteration to their levels of daylight amenity. Where greater changes in the lighting condition are registered, the retained levels fall within the practical application of the BRE guidelines when read in conjunction with the recommendations of Appendix F of the BRE, and the retained daylight levels found with comparable dwellings in an urban location.

As a starting point, the report notes that daylight and sunlight impacts should be considered with regard to the site’s central location within the CAZ. Due to this, the report notes that achieving retained daylight levels of 20% vertical sky component (VSC) would be considered a good level of daylight for surrounding properties in a dense urban location, with a VSC above 15% considered as adequate for dense urban locations.

The report demonstrates that each neighbouring receptor will retain daylight and sunlight levels that are typical of a dense urban location. In comparison to the Appeal Scheme, the results show significant daylight improvements to key windows and rooms surrounding the development site. The most noticeable improvements are found at Whitgift House and 2 Whitgift Street. The report concludes that the proposed development will deliver a considerable improvement in daylight and sunlight compared with the Appeal Scheme.

Overall, and in summary, the daylight/sunlight impacts of the proposed development will not cause unacceptable harm to amenity or result in unacceptable living conditions in accordance with London Plan Policies 7.6 and 7.7, Lambeth Local Plan Policy Q2 and the NPPF (para. 123).

**Private Amenity Space and Play Space**

Local Plan Policy H5 requires developments to provide private external spaces that are both useable and afford privacy and security, at a minimum ratio of 10 sqm of private amenity space per flat.

The London Plan (Policy 3.6) seeks to ensure that suitable play and recreation provision is provided as part of development proposals, with further details set out in the Shaping Neighbourhoods: Play and Informal Recreation SPG. This sets a benchmark of 10 sqm of useable child play space per child, with under-fives children’s play space provided on-site as a minimum.

Using the GLA’s Play Space calculator, the development is anticipated to generate a child yield of 100, giving rise to a requirement of 1,000 sqm of play space. This is subdivided as follows for the different age cohorts:

<table>
<thead>
<tr>
<th>Age Cohort</th>
<th>Number of Children</th>
<th>Play Space Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under 5</td>
<td>59</td>
<td>590 sqm</td>
</tr>
<tr>
<td>5 – 11 years</td>
<td>27</td>
<td>270 sqm</td>
</tr>
<tr>
<td>12+ years</td>
<td>14</td>
<td>140 sqm</td>
</tr>
<tr>
<td>Total</td>
<td>100</td>
<td>1,000 sqm</td>
</tr>
</tbody>
</table>

The proposals aim to maximise the amount of on-site play and amenity space provision whilst providing a high-quality public realm which both activates the site and provides an appropriate quality of public realm for commercial occupiers. Due to the need to provide a significant quantum of employment floorspace alongside an enhanced public realm also serving commercial users, it has not been possible to provide play space for all ages of children on the
site. However, the proposed play space strategy maximises provision for children aged under 5 through the creation of a range of younger child play spaces, rather than for older children.

7.287 The proposed scheme therefore includes 571 sqm of formal play space for under 5s within the residential roof terraces. The remaining marginal 19 sqm is provided as ‘play on the way’ through the site to meet fully the LBL and GLA requirements for play space for under 5s. The play spaces within the scheme are proposed in several locations for both the market and affordable apartments, each being in close proximity to front doors. The spaces include natural play interventions for climbing and balancing, overlooked by seating for carers. Planting areas will provide sensory play space.

7.288 As identified within the Landscape and Public Realm Strategy, the 571 sqm of play spaces provision is provided as follows:

- West Site: 20 sqm within the communal amenity area between the listed building and hotel building.
- Central Site: 166 sqm within the Eastern Garden Building and 291 sqm within the roof terrace of the Whitgift Street Building.
- East Site: 94 sqm provided at the roof terrace of the Newport Street Building.

7.289 In addition to play space, the proposals also include 885 sqm of communal amenity space for residents and nearly 3,500 sqm of private amenity space – jointly in excess of the required provision for the site (4,220 sqm).

7.290 These new public spaces have been designed to be multifunctional, serving the needs of all users throughout the day and thus being a significant improvement to the existing position which has no public access through the site. For older children, the public realm will itself provide opportunities for informal play, particularly in the evenings and at weekends when the spaces will take on a quieter and more residential character. 19 sqm of ’play-on-the-way’ spaces will also be incorporated throughout the public realm in order to provide informal play opportunities at ground floor level and fully meet onsite requirements for children aged under 5 increasing the area to 590 sqm.

7.291 Furthermore, all children will have access to nearby open and place spaces within the surrounding area which will serve the needs of residents of the development. These play spaces vary in the size, character and type of facilities they provide. Within 500 m walk of the site, these include:

- Old Paradise Gardens (c. 100 m walk) - including a play area
- Pedlars Acre Gardens (c. 100 m walk) - playground
- Lambeth Walk Open Space (c. 400 m walk) - playground
- Vauxhall Pleasure Gardens (c. 500 m walk) - outdoor sports
- Archbishop’s Park (c. 500 m walk) - play area and outdoor sports

7.292 Overall, the proposed play space provision is considered to be suitable for the proposed development, given the location of nearby open and play spaces (suitable for children aged 5-17) and the significant enhancements proposed through the new high-quality public spaces and public realm that is proposed. A financial contribution is proposed through the s106 agreement for further enhancements to the nearby parks.

7.293 As outlined in the Design and Access Statement (Section 3), all residents will have access to adequate private and communal amenity spaces in accordance with policy requirements of Local Plan Policy H5 and London Plan Policy 3.6. Notwithstanding this, extensive open space is also
available in close proximity to the site at Old Paradise Gardens, Pedlars Acre Gardens and Vauxhall Pleasure Gardens.

Other Environmental Considerations

Noise

7.294 Policy 7.15 of the London Plan requires development proposals to contribute to the reduction of noise. This approach is maintained by emerging new draft London Plan Policy D13, which seeks to reduce, manage and mitigate noise.

7.295 In respect of residential developments, the Lambeth Local Plan (Policy H6) seeks to ensure that conversions will not lead to an unacceptable level of noise and disturbance and that (Policy A2) outdoor amenity spaces are free from excessive noise. For food and drink uses, the Policy ED7 requires that food and drink uses do not cause unacceptable harm to residential amenity, including through noise impacts.

7.296 A noise and vibration assessment is provided in the ES (Chapter 9). This assesses the likely noise impacts during the construction phase, the noise effects of the development and the noise effects on the development.

7.297 In respect of construction noise, the assessment identifies that the effects during construction will be negligible to major adverse in the short to medium term. However, such instances are anticipated to be limited to discrete activities and of limited duration. Best practice measures and, construction hours’ limitations have been recommended. A Construction Environmental Management Plan will be adopted and agreed with LBL via planning condition.

7.298 At this stage, the precise location and type of all fixed plant during the operational phase have not yet been determined. Noise emission limits have therefore been set for fixed plant items to inform the selection and design process associated with the fixed plant and their installation to ensure that sound levels are adequately controlled.

7.299 The ES Chapter notes higher ambient noise levels due to the site’s proximity to Albert Embankment. The assessment of change in road traffic noise levels on the local road network as a result of the proposed development has shown that effects would not be significant and no mitigation measures are required.

7.300 The noise impacts on residents of the development are considered to be acceptable subject to mitigation. Mitigation measures include mechanical ventilation and glazing specifications; these measures are considered to be sufficient in mitigating noise impacts associated with existing and new road traffic noise, noise from the railway viaduct and noise created in association with the fire station.

7.301 During the long-term life of the scheme, the assessment concludes that the predicted noise levels within the proposed outdoor amenity areas should generally be below the upper targets for such areas, providing that the terraces associated with the Central Square Building and East Garden Building are glazed. Noise levels within the public realm are considered to be acceptable.

7.302 Overall, with the proposed mitigation measures in place that will manage the development and minimise noise levels, the requirements of London Plan policy 7.15 (and emerging new draft London Plan Policy D13) and the Lambeth Local Plan are met.

Air Quality

7.303 London Plan Policy 7.14 requires development to support measures that reduce levels of local air pollution and improve air quality. The new draft London Plan reinforces this approach,
requiring development proposals to address local problems of air quality and use design solutions to prevent or minimise increased exposure to existing air pollution. Whilst the LB Lambeth Local Plan does not include specific policies on air quality, it does confirm that the whole borough is within an Air Quality Management Area in relation to a breach of nitrogen dioxide and particulate matters objectives as specified in the Air Quality Regulations 2000.

7.304 The impacts of the development (during construction and operation) on air quality have been assessed together with the impacts of air quality on residents of the development as part of the Environmental Impact Assessment (Chapter 8 of the ES).

7.305 The assessment of the potential impacts on local air quality from construction activities concludes that the residual effects are not significant.

7.306 The limited traffic generated by the proposed development and the proposed energy generation plant are also not considered to be significant and no mitigation measures are required.

7.307 The ES chapter concludes that the proposed development is air quality neutral in terms of building emissions but not of transport emissions. A number of transport-led mitigation measures are identified in order to reduce the effect of the development on local air quality and the amount of vehicle emissions generated.

7.308 The residual effects of the proposed development are considered to be negligible for NO2 and particulate matter and the overall effect of the proposed development on local air quality is not considered to be significant.

7.309 It is considered that the development proposals, subject to the mitigation measures described above, comply with London Plan policy 7.14 and emerging policy within the new draft London Plan.

Flood Risk

7.310 The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk but, where development is necessary, making it safe without increasing flood risk elsewhere. The London Plan policies 5.11-5.15 require new development to comply with the flood risk assessment and management requirements of National Policy, including the incorporation of sustainable urban drainage systems, and specify a drainage hierarchy for new development.

7.311 Lambeth Local Plan policies EN5 and EN6 establish the policy tests in respect of flood risk and sustainable drainage systems. Policy EN5 requires that the impacts of flooding are minimised through application of the sequential and exception tests and that all developments within Flood Zones 2 or 3 contribute positively to reducing flood risk through avoidance, reduction, management and mitigation.

7.312 The site is located within Flood Zone 3 but the area is defended against tidal flooding by the Thames Tidal Defences up to a standard of 1,000 year return period flood event.

7.313 All but three apartments are located at the first floor or above and therefore would remain unaffected in any potential flood event. Three apartments within Whitgift Street Building are located on the ground floor but these units are raised approximately 600-700mm above the surrounding land, which reduces their residual risk of flooding. They would also only be affected in the case of a breach in a climate change scenario, where the potential depth of flooding would

\[3\] Land assessed as having a 1 in 100 or greater annual probability of River flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.
be only 210mm. As noted in the Flood Warning and Evacuation Plan, all units have safe evacuation routes to upper floors.

7.314 The Flood Risk Assessment (FRA) assesses the flood risk of the proposals and concludes that, whilst the probability of flooding from all sources has been assessed as between medium to negligible, mitigation measures are proposed to reduce the residual risk. These include:

- Safe refuge areas in case of flood (as detailed in the Flood Water Evacuation Plan appended to the FRA).
- On-site surface water drainage system, including attenuation tanks.

7.315 The proposed drainage strategy will ensure that the sustainable management of surface water runoff through the use of SuDS is in line with policy and best practice.

7.316 The FRA has also informed finished floor levels across the site, which are proposed at levels to prevent overland surface water flow from entering buildings, and identifies that the development will not increase the rate of surface water discharge leaving the site or representative rainfall events up to 1% annual probability (including a climate change allowance), in accordance with NPPF, and therefore will not affect the overall surface water flood risk. Overall, it is concluded that the policy requirements of the NPPF, London Plan policies 5.11-5.15, emerging new draft London Plan Policy SI12 and Lambeth Local Plan policies EN5 and EN6 are met.

**Ground Conditions and Contamination**

7.317 Whilst the Lambeth Local Plan does not contain specific policies on land contamination, the supporting text to Policy EN4 notes that a remediation strategy should be submitted prior to commencement of development in instances where contamination exists.

7.318 The ES (Chapter 12) assesses the likely significant effects of the proposed development associated with potential contamination risks during the construction and operational stages. The assessment is informed by the information available at the time of writing this ES which includes a ground investigation undertaken in the Central part of the Site during October and November 2016 and a further ground investigation in the West Site during April and May 2017. The assessments conclude that:

- West Site: Potential risks may be present which may require risk assessment and remedial measures based on the end use. Any areas of contamination identified by ongoing and planned ground investigations will be addressed as a part of the proposed development.
- Central Site: Remedial action is not considered necessary as part of the site’s redevelopment, taking the proposed development into consideration.
- East Site: Potential risks may be present which may require risk assessment and remedial measures based on the end use. Any areas of contamination identified by ongoing and planned ground investigations will be addressed as a part of the proposed development.

7.319 Measures to mitigate the potential effects of contamination are recommended in the ES. In addition, a variety of good environmental site practices will be implemented whilst undertaking construction activities in order to avoid or minimise effects at the source. These include dust suppression measures during construction, a Piling Risk Assessment and chemical validation of imported soils for soft landscaping areas (see ES Chapter 12 for details).

7.320 Further measures to minimise and mitigate the environmental effects of the development during construction are outlined in the Framework Construction Environmental Management Plan submitted with this application.
Micro Climate

7.321 The Planning Practice Guidance identifies the potential for a building’s size and shape to affect the wind microclimate.

7.322 The ES (Chapter 13) considers the likely significant effects of the proposed development on the site and surrounding area in terms of the wind microclimate. The assessment has been informed by wind tunnel testing and has influenced the design of public and private amenity spaces within the proposed development in order to ensure that the wind microclimate is suitable for the intended use.

7.323 Existing wind conditions throughout the Site are suitable for existing uses during the windiest times of the year (i.e. sitting use and leisure walking), apart from isolated areas along Black Prince Road which are classified as suitable for ‘business walking use’.

7.324 The assessment concludes that wind conditions at building entrances will be suitable for the required use and that balcony conditions will be acceptable for sitting during the summer season. Ground and terrace level amenity spaces are found to be suitable for sitting and are considered suitable for the intended use.

7.325 The assessment finds that the effect on one ground floor location (No. 58 – close to the junction of Black Prince Road and Lambeth High Street) is likely to be of moderate negative significance. Measures to mitigate impacts in this area have evolved through an iterative design process in consultation with LB Lambeth and, to mitigate adverse wind conditions, five mast-mounted porous baffles are proposed. In view of the location of these baffles within highway land, such mitigation will additionally need the consent of the planning authority. As noted previously, an application for the stopping up of necessary areas/portions of immediately adjoining highways will be made under section 247 and 248 (as applicable) of the Town and Country Planning Act 1990.

7.326 With the exception of receptor 58, where wind conditions will be no worse than the existing wind conditions in the baseline scenario (and not due to the Proposed Development), the ES concludes that embedded mitigation through design, including landscaping, the site is considered acceptable for its intended use throughout the year.

Planning Obligations

7.327 The NPPF (54-57) and the Community Infrastructure Levy Regulations (2010) both set out the policy and statutory tests for planning obligations, such that planning obligations may only constitute a reason for granting planning permission if they are:

- Necessary to make the proposed development acceptable in planning terms.
- Directly related to the proposed development.
- Fairly and reasonably related in scale and kind to the proposed development.

7.328 These tests will inform the negotiations with the council on the scale and form of planning obligations.

7.329 Discussion are on-going with LB Lambeth but it is envisaged that the Heads of Terms are likely to include:

1. Affordable housing (35% affordable units provided on site) and viability review
2. Low cost MSME workspace provision (provided on site)
3. Employment and Skills Plan and contribution
4. Older children’s playspace contribution
5 Parking management
6 Legible London
7 Wheelchair units (10% accessible units provided) and parking spaces
8 Carbon offset contribution
9 Public art and heritage (including re-provision of the Obelisk)
10 Public realm and highway improvement works
11 Travel Plan initiatives and monitoring
12 Museum and Hotel Visitor Management
13 Re-provision of the New Fire Station and the New Fire Service Museum.
14 Monitoring

7.330 An affordable housing viability assessment has been submitted to the Council. The development viability issues will be affected by the deliverability of obligations covered by Section 106 agreement requirements and will be discussed in detail with LB Lambeth as part of post-submission negotiations.
8.0 Conclusions

8.1 This Planning Statement sets out the rationale for the redevelopment of the site and has considered the key principles of the development against policies set out within national policy and the statutory development plan. Important material considerations include:

1. The Appeal Scheme;
2. Ensuring the long-term future of heritage assets;
3. Provision of a modern, ‘fit for purpose’ fire station to meet the 21st century operational requirements of LFB.

8.2 Whilst the site was once the London Fire Brigade’s Headquarters and hub for innovation, much of the site is now underutilised, making little contribution towards placemaking and (in the case of the CMC Building) detracting from the significance of heritage assets.

8.3 The site is located within the London Plan’s Vauxhall, Nine Elms, Battersea Opportunity Area and occupies a central part of the area covered by the Vauxhall SPD; connecting the character areas of Lambeth Gateway and Central Embankment and providing a link between Lambeth High Street, Albert Embankment and Newport Street. The West and Central Sites also fall within the CAZ.

8.4 The site is allocated for development in the Lambeth Local Plan (Policy PN2 Site 10), which seeks retention/re-provision of the fire station alongside a mix of employment and residential uses. Whilst part of the site falls within a KIBA boundary (the Central and East Sites), the allocation does not preclude residential development and notes that residential uses within the KIBA boundary may exceptionally be possible “if it can be demonstrated that this is necessary to achieve an acceptable scheme in all other respects” (PN2 Site 10, LB Lambeth Local Plan). We have demonstrated the exceptional circumstances in terms of the benefits of creating a truly mixed-use and deliverable development which makes efficient use of land.

8.5 The 13 key development principles set out in Policy SN2 Site 10 are wide ranging and include, provision of active uses, creation of a mixed and balanced community and maximisation of the amount of replacement employment floorspace, including for micro, medium and small sized enterprises.

8.6 The proposals respond to the shortcomings of the Appeal Scheme and conclusions of its dismissal at appeal, providing significant daylight improvements to key windows and rooms surrounding the development site, particularly Whitgift House and 2 Whitgift Street compared to the Appeal Scheme.

8.7 The proposals are the product of extensive pre-application engagement with LB Lambeth, the GLA and Historic England, as well as discussions with local stakeholders and the wider community, and seek to deliver LFB’s key objectives of re-purposing the listed building to provide a new ‘fit for purpose’ fire station that meets the 21st century operational requirements of LFB.

8.8 As well as delivering the fire station, the proposed development meets the policy objectives of Lambeth Local Plan by delivering a truly mixed-use development comprising a new fire station alongside a vibrant mix of residential, employment (including low cost and affordable space), retail and other uses, including a LFB Museum and gallery. It will provide a substantial uplift in jobs (approximately 1,250) and up to 417 new homes. The wide-range of employment spaces will create diverse employment opportunities for established business, small to medium sized enterprises and start-ups.
8.9 The conclusion reached in respect of heritage matters is that the proposal will have a net beneficial effect on heritage assets. Notwithstanding this, if the decision-maker alternatively comes to a view that the overall effect of the proposals on heritage interests is ‘less than substantial’ (rather than neutral or net beneficial), this harm has to be weighed against the public benefits of the proposal, including securing its optimum viable use in accordance with the NPPF (para. 196).

8.10 As noted below, the public benefits are substantial and deliver a number of important benefits for LFB, the local community, Lambeth and London, including:

1. Heritage - Restoration of two underused listed buildings, including partial re-use for their original purposes, preserving the significance of the buildings in terms of those purposes and association and securing the buildings’ long-term future;

2. Emergency Base - Creation of a new modern ‘fit for purpose’ firefighting and emergency services base for central London in a strategic location to achieve fast response times to increasingly-regular emergency incidents;

3. Fire Station - Provision of a fire station and LFB Museum that will facilitate LFB engagement with the local community;

4. Museum - Creation of a permanent home for the LFB museum, at its original site, resulting in educational and cultural benefits to the locality and wider London and with interface with an operating fire station;

5. New Homes - Delivery of new housing to support London’s urgent needs, including substantial new affordable housing;

6. New Residents - Helping to deliver a boost to the local economy through ‘first occupation expenditure’ of £2.3 million on goods and services, a proportion of which will be retained locally;

7. Resident Expenditure - Generating circa £3.9 million of additional resident expenditure in shops and services each year, in turn supporting 35 permanent FTE jobs in the local area;

8. New and diverse employment opportunities - Creating space for approximately over 1,250 direct jobs on site across a range of sectors and creation of additional jobs during construction and from associated resident and occupier expenditure;

9. Economic Value – Generating £93 million of direct and indirect GVA per annum during the construction stage and £103 million of direct GVA per annum once operational;

10. Business rates - Payment of more than £1.7 million of business rates to LBL per annum;

11. Design - High quality architecture that responds positively to and enhances the character of the area and surrounding buildings;

12. Placemaking - Revitalising the local area through the introduction of active uses between Waterloo and Vauxhall;

13. Tourist Interest - Adding to and spreading tourism and leisure infrastructure along the river on South Bank through the provision of a new hotel and the re-instated museum;

14. Public Views and Access - Creation of a roof top restaurant offering public access to substantial river views;

15. Public Realm - Enhancements to public realm and wayfinding, including through provision of around 1,900 sqm of high quality, permeable public realm (currently the site does not provide any public realm and the appeal scheme provided less than 600 sqm);
16 Cultural - Provision of active uses on Newport Street complementing its attractiveness as a destination for arts and cultural uses and provision of the LFB Museum - a museum identified for delivery in the Mayor Culture Strategy (2018);

17 Sustainability - Re-use of a largely-vacant brownfield building and land in the heart of London; and

18 Planning Obligations - Financial contributions towards the delivery of local infrastructure via CIL and s106 contributions.

8.11 The ES and technical appendices consider the environmental impacts of the proposals and demonstrate how they are acceptable, propose mitigation where required and conclude that the proposed development will not result in significant adverse environmental effects.

8.12 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts and that the determination should be made in accordance with the plan unless material considerations indicate otherwise.

8.13 The proposed development will secure the regeneration and revitalisation of an important site as identified within the Lambeth Local Plan, the VNEB OAPF and the Vauxhall SPG. It will realise LFB’s objectives, support the local area as a destination for arts and culture, whilst also sustaining and enhancing heritage assets and securing their long-term future.

8.14 Overall, the proposals embrace the design and placemaking principles set out in planning policy and guidance and will knit together the areas of Lambeth Gateway and Central Embankment, to provide a dynamic and lively new urban quarter, revitalised heritage assets and public realm in the process.
Appendix 1  Surrounding Developments
Appendix 1: Surrounding Developments

<table>
<thead>
<tr>
<th>Application Reference, Address &amp; Decision</th>
<th>Description</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>36-46 Albert Embankment 16/00795/FUL</td>
<td>Demolition of all structures associated with the petrol filling station and redevelopment of the site to provide a residential led, mixed-use development, comprising the retention and refurbishment of vintage house and development of ground plus 24 storeys in the form of two no. towers, linked at ground to fifth floor, and consisting of retail/restaurant use (Use Class A1/A3), office (Use Class B1), up to 166 residential units (Use Class C3), basement car and bicycle parking, resident amenities and all necessary ancillary and enabling works.</td>
<td>Construction not yet commenced.</td>
</tr>
<tr>
<td>22-29 Albert Embankment 14/04757</td>
<td>Demolition of existing buildings and redevelopment to provide a part 12, part 18 and part 30 storeys mixed-use development comprising flexible A1, A3, B1 units and C3 residential units, together with associated access, car parking, cycle parking, refuse storage, and landscaping.</td>
<td>Currently under construction.</td>
</tr>
<tr>
<td>1 Lambeth High Street 14/02104/FUL</td>
<td>Demolition of the existing building and redevelopment of site to provide 69 residential units (Class C3), 1,055 sqm of office/retail use (class B1/A1) at ground floor, car and cycle parking, new pedestrian and vehicular access, hard and soft landscaping.</td>
<td>Currently under construction.</td>
</tr>
<tr>
<td>Prince Consort House, 27-29 Albert Embankment 13/02347/FUL</td>
<td>Erection of a part 9, part 23, part 27 storey residential led mixed-use development comprising a ground floor cafe/retail unit (Use Classes A1,A2 and A3), office space (Use Class B1) and 47 residential units (Use Class C3).</td>
<td>Currently under construction.</td>
</tr>
<tr>
<td>The Corniche, Hampton House, 20 Albert Embankment 13/03582/VOC</td>
<td>Demolition and redevelopment of the existing building and the erection of a part 15, part 16-24, part 19-27 storey building to provide a residential led mixed-use development comprising ground floor cafe/restaurant uses (A3); office (B1); residents gym and members lounge; and 248 residential units, together with ancillary residential facilities, associated amenity space, car, motorcycle and cycle parking, access and servicing, refuse storage and collection facilities and landscaped public piazza.</td>
<td>Currently under construction.</td>
</tr>
<tr>
<td>Former Lilian Baylis School 12/04256/FUL</td>
<td>Change of use and redevelopment of the northern part of the school site comprising: On the western side of the site the demolition of all existing buildings (Gurney House, design block, dining block and caretaker house) and the erection of new residential buildings ranging between three and six storeys in height accommodating 86 dwellings and; On the eastern side of the site the demolition of the art block, and the conversion and extension of the remaining buildings (teaching, administration, hall and science blocks) to create 63 dwellings and a 978 sqm (GIA) community facility (D1 and/or D2).</td>
<td>Currently under construction.</td>
</tr>
<tr>
<td>Queensborough House, Nos. 12-18 Albert Embankment 13/00019/FUL</td>
<td>Extension of existing hotel building to provide 98 additional rooms over 5 new floors, recladding existing facade, creation of new open spaces at roof level.</td>
<td>Completed.</td>
</tr>
<tr>
<td>Hampton House, 20 Albert Embankment</td>
<td>Erection of a part 15, part 16-24, part 19-27 storey building to provide 253 residential units, cafe/restaurant uses (A3), office</td>
<td>Currently under construction.</td>
</tr>
<tr>
<td>Application Reference, Address &amp; Decision</td>
<td>Description</td>
<td>Status</td>
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<td>------------------------------------------</td>
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</tr>
<tr>
<td>12/04422/FUL Granted 21.06.13</td>
<td>(B1) and ancillary residential facilities and landscaped public piazza.</td>
<td></td>
</tr>
<tr>
<td>Eastbury House, Nos. 30-34 Albert Embankment 12/01768/FUL Granted 24.12.12</td>
<td>Erection of a part 14, part 21, part 28 storey building to provide a mixed-use scheme incorporating: ground floor cafe/retail unit (A1/A3) and public piazza, office accommodation (B1) and 48 residential units.</td>
<td>Currently under construction.</td>
</tr>
<tr>
<td>Riverbank Plaza, No. 10 Albert Embankment 11/00909/FUL Granted 15.03.12</td>
<td>Erection of a 15 storey (including basement) apart-hotel together with restaurant and residential penthouse.</td>
<td>Completed.</td>
</tr>
<tr>
<td>No. 81 Black Prince Road APP/N5660/A/09/2101423 (08/04454/FUL) Granted 15.09.09</td>
<td>Erection of a 23 storey building (including basement) to contain 1,770m² (GEA) of commercial floorspace (flexible use B1 or A2) together with 101 flats on the upper floors. Allowed at appeal (15/09/09).</td>
<td>Completed.</td>
</tr>
<tr>
<td>Salamanca Tower, Salamanca Place APP/N5660/A/04/1147714 (03/03576/FUL) Granted 15.09.09</td>
<td>17 storey tower to provide 43 one and two bedroom residential units together with commercial uses on the ground, first and second floors.</td>
<td>Completed.</td>
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</tbody>
</table>
Appendix 2  Planning History
## Appendix 2: Planning History

<table>
<thead>
<tr>
<th>Application Reference, Address &amp; Decision</th>
<th>Description</th>
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<tbody>
<tr>
<td>18/04185/VOC Granted 21.12.18</td>
<td>Variation of condition 1 (Temporary use to be discontinued) of Planning Permission ref: 16/03122/FUL (Change of use from Workshop (Use Class Sui Generis) to a Museum and event space (Use Class D1) for a temporary period of 18 Months starting from 1st July 2016) granted 07/09/2016. Variation sought: To allow continuation for temporary use for an additional one-year period.</td>
</tr>
<tr>
<td>17/05142/VOC Granted 21.12.17</td>
<td>Variation of Condition 1 (temporary –permission end date) of planning ref 16/03122/FUL (Change of use from Workshop (Use Class Sui Generis) to a museum and event space (Use Class D1) for a temporary period of 18 months starting from 1st July 2016.) Granted on 07.09.2016. Variation sought: To allow the continuation of the temporary use for a period of an additional 12 months.</td>
</tr>
<tr>
<td>16/03122/FUL Granted 07.09.16</td>
<td>Change of use from Workshop (Use Class Sui Generis) to a museum and event space (Use Class D1) for a temporary period of 18 months starting from 1st July 2016.</td>
</tr>
<tr>
<td>10/04473/FUL Refused 03.02.12</td>
<td>Refurbishment, alteration and extension to the grade II listed fire station to provide a fire station and associated functions for the London Fire Brigade (sui generis) on part basement and ground floors, with residential (class C3) above, including demolition of the communication mobilising centre. Demolition of the brigade workshop/office buildings to the rear of the fire station. Construction of 7 new buildings ranging in height from 5 to 15 storeys for mixed-use purposes, including residential dwellings (class C3); office/business space (class B1); ground floor units for shops, financial and professional services, restaurants and cafes, and/or drinking establishments (classes A1, A2, A3 and/or A4); and ancillary facilities. Refurbishment and internal alterations to the grade II listed drill tower associated with the new fire station. Construction of basements to provide servicing, parking, energy centre, plant and storage. Creation of areas of open space and alterations to the existing vehicular and pedestrian accesses and highway arrangements within and around the site. The development would provide a total of 265 residential units, a 2,721 sqm fire station, 8,554 sqm of commercial floorspace (use Class B1), 696 sqm of retail/A Class floorspace and 92 car parking spaces.</td>
</tr>
<tr>
<td>10/04476/CON Refused 03.02.12</td>
<td>Demolition of brigade workshop/office buildings on land bounded by Lambeth High Street to the west, Whitgift Street to the north, Southbank House to the south and railway viaducts to the east.</td>
</tr>
<tr>
<td>10/04475/LB Refused 03.02.12</td>
<td>Refurbishment, partial demolition, extensions and alterations to fire station and drill tower including: demolition of modern rear extension, erection of a rear extension at fourth to ninth levels and single storey roof extension. External cleaning and repair, creation of ground floor entrance on south flank, alterations and extension to basement, works associated with connection of covered wash down area to rear of building connecting at first floor level. Internal alterations to provide residential accommodation on first to tenth floors, and fire station and ancillary facilities at basement and ground floors. Refurbishment and internal alterations to the drill tower, and works associated with connection of a building on east flank of the listed building at ground floor level and connection of a single storey building on the north flank of the listed building.</td>
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Appeals (APP/N5660/A/12/2180815, APP/N5660/E/12/2180808 and APP/N5660/E/12/2180812) dismissed 13.05.13

10/00318/FULL Withdrawn 29.04.10 Refurbishment, reconstruction and extension to the grade II fire station to provide a new fire station and associated functions for the London Fire Brigade (sui generis) on part basement and ground floors, with residential (class C3) above, including
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<tr>
<td><strong>10/00319/LB</strong> Withdrawn 29.04.10</td>
<td>Refurbishment, partial demolition, reconstruction and alterations to fire station and drill tower including: demolition of modern rear extension, erection of a rear extension at fourth to tenth levels and 2 storey roof extension. External cleaning and repair, creation of ground floor entrance on south flank, alterations and extension to basement, works associated with connection of covered wash down area to rear of building connecting at first floor level. Internal alterations to provide residential accommodation on first to tenth floors, and fire station and ancillary facilities at basement and ground floors. Refurbishment and internal alterations to the drill tower, and works associated with connection of a building on east flank of the listed building at ground floor level and connection of a building on the north flank of the listed building at ground to sixth floor levels.</td>
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<tr>
<td><strong>10/00320/CON</strong> Withdrawn 29.04.10</td>
<td>Demolition of brigade workshop/office buildings on land bounded by Lambeth High Street to the west, Whitgift Street to the north, Southbank House to the south and railway viaducts to the east.</td>
</tr>
<tr>
<td>Brigade Workshop (Central Site); Granted 1999</td>
<td>Formation of door opening in Whitgift Street elevation and crossover (for trolley access) adjacent to Whitgift Street.</td>
</tr>
<tr>
<td>Fire Bridge Headquarters (West Site); Granted 1998</td>
<td>Alterations to the fenestration on the west, sides and rear elevations to provide aluminium tilt-turn windows with single large panes.</td>
</tr>
<tr>
<td>Fire Bridge Headquarters (West Site); Granted 1996</td>
<td>Installation of windows to the north elevation of building.</td>
</tr>
<tr>
<td>Brigade Workshop (Central Site); Granted 1993</td>
<td>Erection of 3 metre high palisade fence between the vehicle workshops and the railway viaduct.</td>
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Appendix 3  Schedule of Planning Policies
Appendix 3: Schedule of Planning Policies

This appendix details the policy content for the application, describing the Development policies relevant to the consideration of the scheme, as well as providing an account of prevailing policy guidance in the National Planning Policy Framework and other documents that represent appropriate material considerations.

Development Plan and Material Considerations

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

The Statutory Development Plan comprises:

1. The London Plan (2016)
2. LBL Local Plan (2015)

Statutory Development Plan Policy

The London Plan (2016)

The London Plan provides the overall strategic planning policy framework for the assessment of development proposals in London. A summary of the policies relevant to the assessment of the proposals is provided below.

**Policy 1.1 (Delivering the strategic vision and objectives for London):** seeks to ensure that new development will result in growth and change that will enable London to realise the Mayor’s vision for London’s sustainable development to 2036. This will be achieved by securing growth that will not encroach upon the Green Belt or London’s protected open spaces and having no unacceptable impacts on the environment. Decisions on development will aim to realise the objectives set out under paragraph 1.53 of the London Plan.

**Policy 2.1 (London in its Global, European and United Kingdom Context):** seeks to ensure that London retains and extends its global role as a sustainable centre for business, innovation, creativity, health, education and research, culture and art and as a place to live, visit and enjoy.

**Policy 2.9 (Inner London):** outlines that inner London should seek ways to realise its potential by sustaining and enhancing economic and demographic growth, ensuring the availability of appropriate workspaces for the area’s changing economy and improving the quality of life for those working, studying or visiting there.

**Policy 2.10 (Central Activities Zone – Strategic Priorities):** seeks to enhance and promote the role of the Central Activities Zone (CAZ).

**Policy 2.11 (Central Activities Zone – Strategic Functions):** seeks to ensure that development complements and supports the clusters of strategically important and specialised CAZ uses.

**Policy 2.12 (Central Activities Zone – Predominantly Local Activities):** supports the protection and enhancement of predominantly residential neighbourhoods within CAZ and to ensure that social infrastructure providers meet the needs of both local residents and visitors.

**Policy 2.13 (Opportunity Areas and Intensification Areas):** supports the optimisation of residential and non-residential density within these areas.
Policy 2.15 (Town Centres): promotes London’s network of town centres as the main focus for commercial development and intensification.

Policy 3.3 (Increasing Housing Supply): recognises the need for more homes in London and seeks to ensure that housing need is met through consistent provision which will improve housing choice and affordability.

Policy 3.4 (Optimising Housing Potential): recognises that development should optimise housing output for different types of location as detailed within Table 3.2 of the London Plan.

Policy 3.5 (Quality and Design of Housing Developments): seeks to ensure that housing developments are of high quality and enhance London’s residential environment and attractiveness.

Policy 3.6 (Children and Young People’s Play Facilities): requires that development proposals should make provision for play and informal recreation space as per the Mayor’s SPG on play and informal recreation space.

Policy 3.7 (Large Residential Developments): sets out that large residential developments including complementary non-residential use are encouraged in areas of high public transport accessibility.

Policy 3.8 (Housing Choice): requires that new developments provide a wide range of housing choice in terms of housing size and type and the requirements of different groups.

Policy 3.9 (Mixed and Balanced Communities): sets out that a balanced mix of tenure should be encouraged, and supported via an effective and attractive design with adequate infrastructure.

Policy 3.10 (Definition of Affordable Housing): states that affordable housing is defined as social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. Affordable housing should include provision to remain at an affordable price for future eligible households.

Policy 3.11 (Affordable Housing Targets): sets out that 60% of affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale.

Policy 3.12 (Negotiating Affordable Housing on Development Schemes): requires that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed-use schemes.

Policy 4.1 (Developing London’s Economy): seeks to promote and enable the continued development of a strong, sustainable and diverse economy, including, inter alia, by maximising the benefits from new infrastructure to secure growth and development.

Policy 4.2 (Offices): supports the renewal, modernisation and increase in office stock to improve London’s competitiveness and to attract business of different types and sizes.

Policy 4.3 (Mixed-use Development and Offices): states that increases in office floorspace should provide a mix of uses including housing within the CAZ unless such a mix would demonstrably conflict with other polices in the plan.

Policy 4.4 (Managing Industrial Land and Premises): outlines that a sufficient stock of land and premises should be provided to meet the future needs of different types of industrial and related uses. Surplus industrial land to be released where it can contribute to strategic and local planning objectives.

Policy 4.5 (London’s Visitor Infrastructure): indicates that development should support London’s visitor economy, with strategically important hotel provision focussed on opportunity areas within the CAZ.

Policy 4.6 (Support for and enhancement of Arts, Culture, Sport and Entertainment): seeks to ensure that developments should support the continued success of London’s arts, cultural, sporting and entertainment enterprises and seek to provide a cultural focus to support sustainable local communities.
**Policy 4.7 (Retail and Town Centre Development):** states that the scale of retail, commercial, culture and leisure development should be related to its size, and be focused on sites within town centre sites if possible and well integrated with the existing centre and public transport.

**Policy 4.8 (Supporting a successful and diverse retail sector):** confirms that a positive approach should be taken to additional comparison retail in major areas and convenience goods in smaller local centres so support the range of London’s retail services.

**Policy 4.9 (Small Shops):** seeks to ensure that conditions are imposed or obligations obtained where appropriate to provide or support affordable shop units to promote the retail offer.

**Policy 5.1 (Climate Change Mitigation):** seeks to achieve an overall reduction in London’s carbon dioxide emissions of 60 per cent (below 1990 levels) by 2025.

**Policy 5.2 (Minimising Carbon Dioxide Emissions):** requires development proposals to make the fullest contribution to minimising carbon dioxide emissions, in accordance with the energy hierarchy.

**Policy 5.3 (Sustainable Design and Construction):** requires the highest Standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.

**Policy 5.6 (Decentralised Energy in Development Proposals):** requires development proposals to evaluate the feasibility of Combined Heat and Power (CHP) systems, and where a new CHP system is appropriate also examine opportunities to extend the system beyond the site boundary to adjacent sites.

**Policy 5.7 (Renewable Energy):** states that within the framework of the energy hierarchy (see Policy 5.2), major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.

**Policy 5.9 (Overheating and Cooling):** requires major development proposals to reduce potential overheating and reliance on air conditioning systems and demonstrate this in accordance with the cooling hierarchy.

**Policy 5.10 (Urban Greening):** promotes and supports the greening of urban environments in an effort to adapt to and reduce the effects of climate change. The policy recommends that green infrastructure is integrated from the beginning of the design process.

**Policy 5.12 (Flood Risk Management):** seeks to address current and future flood issues and minimise risk in a sustainable manner.

**Policy 5.13 (Sustainable Drainage):** requires developments to utilise SUDS where feasible; aim for green field run-off rates; and ensure the sustainable management of surface run-off.

**Policy 5.14 (Water Quality and Wastewater Infrastructure):** requires that adequate wastewater infrastructure capacity is available in tandem with development and ensure that proposals that upgrade London’s sewage treatment capacity are supported.

**Policy 5.15 (Water Use and Supplies):** promoted the minimisation of mains water through sustainable water supply infrastructure and water saving measures and equipment.

**Policy 5.16 (Waste net self-sufficiency):** seeks to minimise waste levels and facilitate positive environmental and economic impacts from waste processing.

**Policy 6.3 (Assessing Effects of Development on Transport Capacity):** seeks to ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed, and should not adversely affect safety on the transport network.
Policy 6.4 (Enhancing London’s Transport Connectivity): seeks to improve public transport access, with DPDs identifying development opportunities related to locations which will benefit from increased public transport accessibility.

Policy 6.7 (Better streets and surface transport): requires that DPDs should promote bus, bus transit and tram networks.

Policy 6.9 (Cycling): states that development should provide integrated cycle facilities and parking, in line with minimum standards set out in The London Plan.

Policy 6.10 (Walking): requires that development proposals should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space.

Policy 6.13 (Parking): seeks to strike a balance between provision of sufficient parking, and preventing over-provision of parking that may undermine more sustainable transport modes.

Policy 7.1 (Lifetime Neighbourhoods): requires that development is designed so that the layout, tenure and mix improves people’s access to social and community infrastructure, employment, the blue ribbon network, local shops and training opportunities.

Policy 7.2 (An Inclusive Environment): requires all new development in London to achieve the highest standards of accessible and inclusive design.

Policy 7.3 (Designing Out Crime): requires development to reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.

Policy 7.4 (Local Character): requires development to have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area’s visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Policy 7.5 (Public Realm): states that development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way.

Policy 7.6 (Architecture): requires architecture to make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.

Policy 7.7 (Location and Design of Tall and Large Buildings): states that applications for tall or large buildings should include an urban design analysis that demonstrates the proposal is part of a strategy that meets certain criteria.

Policy 7.8 (Heritage Assets and Archaeology): states that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

Policy 7.11 (London View Management Framework): requires that development will be assessed for its impact on the designated view if it falls within the foreground, middle ground or background of that view.

Policy 7.12 (Implementing the London View Management Framework): states that new development should not harm, and should aim to make a positive contribution to strategic views and their landmark elements.

Policy 7.14 (Improving Air Quality): seeks to minimise air pollution and reduce airborne pollutants.

Policy 7.15 (Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes): seeks to reduce noise pollution and enhance the acoustic environment.
Policy 7.18 (Protecting Open Space and Addressing Deficiency): states that the loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area.

Policy 7.19 (Biodiversity and access to nature): states that development proposals should wherever possible make a positive contribution to biodiversity and avoid any adverse impact on areas of biodiversity interest.

Policy 7.29 (The River Thames): requires that Development proposals within the Thames Policy Area identified in LDFs should be consistent with the published Thames Strategy for the particular stretch of river concerned.

Policy 8.2 (Planning Obligations): states that development proposals should seek to address strategic as well as local priorities in planning obligations, and that affordable housing, Crossrail funding, and other public transport improvements should be given the highest importance.

Policy 8.3 (Community Infrastructure Levy): confirms that boroughs should give priority for the application of CIL to strategically important infrastructure.

Local Plan (2015)

LBL adopted the Local Plan in September 2015. This document sets out the vision, strategic objectives and development management policies for development in Lambeth to 2030. A summary of the policies relevant to the assessment of the proposals is provided below.

Policy D2 (Presumption in favour of sustainable development) confirms the policies within the plan are in conjunction with the presumption in favour of sustainable development as set out within the NPPF.

Policy D4 (Planning obligations) confirms that Section 106 planning obligations will be sought to secure affordable housing and ensure that development proposals fund local improvements to mitigate the impact of the development.

Policy ED1 (Key Industrial and Business Areas) states that development in KIBAs will be permitted only for business uses and compatible industrial and commercial uses which are ancillary or providing for the needs of the KIBA.

Policy ED3 (Large Offices) states that proposals for offices greater than 1,000sqm will be supported in the CAZ, Vauxhall and Waterloo London Plan Opportunity Areas and Brixton and Streatham major town centres.

Policy ED6 (Town Centres) states that the Council will support the vitality and viability of Lambeth’s hierarchy of major, district and local centres, and CAZ frontage.

Policy ED7 (Evening economy and food and drink uses) seeks to support the evening economy in town centres; evening and food and drink uses should be primarily located in town centres and CAZ frontage.

Policy ED10 (Local centres and dispersed local shops) seeks to support and protect local centres and shops, promoting active frontage uses.

Policy ED11 (Visitor attractions, leisure, arts and culture uses) aims to promote and safeguard leisure, recreation, arts and cultural facilities particularly in the CAZ, Vauxhall and Waterloo London Plan Opportunity Areas and in town centres.

Policy ED12 (Hotels and other Visitor Accommodation) supports hotel and visitor accommodation use within the CAZ, Vauxhall and Waterloo London Plan Opportunity Areas
Policy ED14 (Employment and training) confirms that applications which seek to boost employment and training will generally be supported.

Policy EN1 (Open space and biodiversity) requires that development which would involve the loss of existing public or private open space will not be supported unless the open space can be replaced at an equivalent or better quality, suitable regeneration and community benefits or the provision of facilities which relate directly to the open space.

Policy EN3 (Decentralised Energy) states that all major developments will be expected to connect to or extend existing decentralised heating, cooling or power networks in the vicinity of the site.

Policy EN4 (Sustainable design and construction) requires that all development must meet high standards of sustainable design, providing a statement to indicate how the design and construction standards will be met.

Policy EN5 (Flood Risk) seeks to minimise the impact of flooding in the borough and will ensure development does not increase flood risk, steering development towards areas of lowest flood risk.

Policy EN6 (Sustainable drainage systems and water management) requires that water sensitive urban design is utilised to help manage surface run-off above ground. Design should ensure that there is no detrimental impact on floodwater flow routes across the site.

Policy EN7 (Sustainable waste management) requires that all major development proposals incorporate on-site waste management facilities, and recycle construction and demolition waste on site wherever practicable.

Policy H1 (Maximising housing growth) seeks to maximise the supply of additional homes in the borough to meet the annual housing target as set out in the London Plan.

Policy H2 (Delivering affordable housing) seeks to deliver the maximum reasonable amount of affordable housing on private residential and mixed-use schemes.

Policy H4 (Housing mix in new developments) supports proposals which will offer a range of dwelling sizes and types to meet current and future housing needs.

Policy H5 (Housing standards) states that new residential development should accord with the principles of good design.

Policy H8 (Housing to meet specific community needs) seeks to support housing which meets specific community needs across a range of tenures provided it accords with suitable standards and will meet an identified need.

Policy PN2 (Vauxhall) seeks to promote a new district centre at Vauxhall known as Vauxhall Cross. Mixed-use development will be supported that contributes to the creation of this centre; commercial uses in line with its CAZ designation as part of the wider London Plan Vauxhall/Nine Elms/Battersea Opportunity Area (Now known as Nine Elms Vauxhall).

Policy Q1 (Inclusive environments) seeks improvements to accessibility provision and ensure that proposals demonstrate inclusive design.

Policy Q2 (Amenity) requires that development does not have a negative impact on any form of amenity. Development must not result in unacceptable daylight/sunlight impacts and adequate outdoor amenity space is provided.

Policy Q3 (Community safety) states that proposals should incorporate design which designs out anti-social behaviour and of materials that are resistant to criminal damage.

Policy Q4 (Public Art) seeks to retain good quality examples of public art and will seek contributions towards the provision of new art where appropriate.
Policy Q5 (Local distinctiveness) seeks to promote design which responds to the local character.

Policy Q6 (Urban design: public realm) states that development will be supported provided that the design delivers benefits to the public realm and makes effective use of the site.

Policy Q7 (Urban design: new development) states that new development will generally be supported if it delivers a high quality of design.

Policy Q8 (Design quality: construction detailing) seeks to ensure that proposed building designs and submitted details are buildable and visually attractive.

Policy Q9 (Landscaping) requires that development must have satisfactory regard to landscaping and ecological protection.

Policy Q10 (Trees) states that development will not be permitted that would result in the loss of trees of significant amenity, historic or conservation value. Proposals will only be accepted where trees are located on site if it can be demonstrated that the trees can be satisfactorily retained or positively integrated as part of the site layout.

Policy Q11 (Building alterations and extensions) requires that proposals will respond to the original design and detailing, particularly those which demonstrate locally distinct features.

Policy Q12 (Refuse/recycling storage) requires that adequate refuse and recycling storage should be provided for all development.

Policy Q13 (Cycle storage) requires that cycle storage is to be provided in all development which should be fully integrated into proposals at design stage and directly and conveniently accessed from outside the building.

Policy Q18 (Historic environment strategy) confirms that the Council will prepare a Historic environment strategy to confirm the approach to development management policies Q19, Q20, Q21, Q22, Q23, Q24, Q25 and Q26.

Policy Q19 (Westminster World Heritage Site) confirms that development affecting the Westminster World Heritage Site must preserve or enhance the value of the asset, further to preserving and enhancing its setting.

Policy Q20 (Statutory listed buildings) requires that development affecting listed buildings will be supported provided that the proposal does not harm the significance of the asset or associated views, or limit its ability to remain in a viable use.

Policy Q22 (Conservation Areas) states that development proposals which affect conservation areas will be permitted where they preserve or enhance the character or appearance of the conservation area.

Policy Q23 (Undesignated heritage assets: local heritage list) confirms that the Council will resist the destruction of assets on the local heritage list and expect development proposal to either retain or enhance them should they be affected.

Policy Q24 (River Thames) requires that proposals along the River Thames will need to enhance the character of the river frontage and respect the unique character of Albert Embankment. Development will need to preserve the setting of the Thames bridges and the value of the river's blue infrastructure.

Policy Q25 (Views) will resist development which harms the significance of strategic views (Panoramas, Linear Views, River Prospects and Townscape Views defined in the LVMF)

Policy Q26 (Tall and large buildings) seeks to support proposals for tall buildings where they do not have an adverse impact on the surrounding area or impact on strategic views and heritage assets.
**Policy T1 (Sustainable travel)** requires that development that generates a significant number of trips will need to be located within an area of high PTAL or deliver public transport improvements to increase capacity to an appropriate level.

**Policy T2 (Walking)** seeks to secure an improved environment for pedestrians in respect of development proposals that are likely to generate an increase in the number of walking trips.

**Policy T3 (Cycling)** requires the provision of appropriate secure and covered cycle parking facilities in accordance with the minimum standards set out in the London Plan.

**Policy T4 (Public transport infrastructure)** seeks to promote better connectivity, quality and capacity in public transport, including through developer contributions and/or provision.

**Policy T6 (Assessing impacts of development on transport capacity and infrastructure)** confirms that planning applications will be supported where they do not have unacceptable transport impacts.

**Policy T7 (Parking)** requires that development should provide car parking within the maximum standards of the London Plan

**Policy T8 (Servicing)** indicates that development will be permitted where adequate provision is made for servicing appropriate to the scale of development. Major applications will require a supporting construction management plan.

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<td>LB Lambeth Conservation Area Appraisal Building Alterations &amp; Extensions SPD (2015) Albert Embankment Conservation Area Character Appraisal (May 2017) Historic England Advice Notes 1, 2, 3, 4 HE Archaeological and Historic Pottery Production Sites: Guidelines for best practice</td>
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<td>Planning Obligations (including Affordable Housing)</td>
<td>N/A</td>
<td>3.10-3.12, 8.2-8.3</td>
<td>D4, H2</td>
<td>T9: Funding transport infrastructure through planning DF1: Delivery of the plan and planning obligations</td>
<td>Approved Lambeth CIL Charging Schedule (2014)</td>
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| Planning Obligations (including Affordable Housing) | N/A                  | 3.10-3.12, 8.2-8.3     | D4, H2                    | T9: Funding transport infrastructure through planning DF1: Delivery of the plan and planning obligations | Approved Lambeth CIL Charging Schedule (2014) |

Lambeth Transport Plan (2011)
Lambeth Air Quality Planning Guidance Notes (2015)
Lambeth Strategic Flood Risk Assessment (2013)
Lambeth Local Flood Risk Management Strategy (2014)
Appendix 4  LFB Operations Statement
8 Albert Embankment

LFB Operations Statement

March 2019
1.0 Introduction

This Operations Statement accompanies a planning application being submitted by U and I (8AE) Ltd and the London Fire Commissioner (LFC) for the comprehensive redevelopment of the former headquarters of the London Fire Brigade (LFB) at 8 Albert Embankment including Lambeth Fire Station, to provide a truly mixed-use development, comprising 417 new homes including 146 affordable homes (35% affordable by unit and 34% affordable by habitable rooms) alongside over 24,000 sq m (GIA) of non-residential floorspace. The non-residential floorspace comprises:

- 2,203 sq m new fire station for LFC (sui generis);
- 1,434 sq m London Fire Brigade Museum (Use Class D1);
- Hotel of up to 200 bedrooms, 6,270 sq m (Use Class C1) including a 56 sq m flexible retail of hotel space (Use Classes A1/A2/A3/A4/C1);
- 10,809 sq m of new office floorspace, including:
  - 9,123 sq m of corporate office floorspace (Use Class B1(a));
  - 1,348 sq m of medium office floorspace (Use Classes B1(a)/B1(b)/B1(c));
  - 186 sq m of small office floorspace (Use Classes B1(a)/B1(b)/B1(c));
  - 142 sq m of micro office floorspace (Use Classes B1(a)/B1(b)/B1(c));
  - 455 sq m flexible retail unit (Unit Classes A1/A2/A3/A4);
  - 173 sq m flexible commercial unit (Unit Classes A1/A2/A3/A4/B1/D1/D2);
  - Gym of up to 2,053 sq m (GIA) (Unit Class D2); and
  - 865 sq m restaurant (Use Class A3);

  together with associated areas of new public realm, hard and soft landscaping, basement and surface parking, servicing, means of access and plant and equipment. (the Proposed Development).

2 The purpose of this Operations Statement is to explain the involvement that the LFB has had in bringing forward the Proposed Development and why it is key to our future.
The London Fire Commissioner is the fire and rescue authority for London and runs the LFB. The LFB is London’s fire and rescue service. It is the busiest in the UK and one of the largest firefighting and rescue organisations in the world. It is here to make London a safer city for those who use it everyday.

LFB has 102 fire stations, and one river station which operate 24 hours a day, 365 days a year. LFB can deploy 142 fire engines and a further 74 specialist operational vehicles, to provide an efficient and effective response to incidents across London.

LFC has a statutory duty under the Fire and Rescue Services Act 2004 (the Act) for delivering fire and rescue services within Greater London and fulfils this duty through the LFB. Section 1 of the Act (as amended by the Policing and Crime Act 2017) says “The fire and rescue authority for an area is the authority determined under this Section... the London Fire Commissioner is the fire and rescue authority for Greater London”. Part 2 of the Act sets out the core functions of the fire authority in respect of fire safety, fire fighting, road traffic accidents and other emergencies.

The Policing and Crime Act 2017 brought fire and rescue services in London under the direct responsibility of the Mayor of London by abolishing the London Fire and Emergency Planning Authority (LFEPA) and creating the LFC as a corporation sole. It also enabled the Mayor to appoint the Deputy Mayor for Fire and Resilience.

The LFC is legally responsible for the actions of the LFB and for the management of its resources in relation to its fire and rescue services within the areas of thirty-two London Boroughs and the City of London, serving 8.6 million residents as well as those who work in, or visit, the city. In 2017, the LFB received 172,619 emergency (999) calls, and attended 104,870 emergency incidents of which 19,863 were fires and 31,851 were special services (non fire related incidents such as road traffic accidents, flooding and chemical incidents). The rest were false alarms.

LFB locate the fleet of emergency response vehicles where they can offer the best protection to London as a whole. Many people think that it is their local fire station that provides them with all of their emergency cover and while geographic location of a fire station helps us to maintain our fast response times, we plan emergency cover on a London-wide basis. This means resources will come from anywhere in London if needed. For many incidents vehicles can come from a number of different stations.
9 LFB aim to get fire engines and other resources to incidents as quickly as possible. LFB have targets for how quickly the first and second fire engines reach an incident. The attendance time target for the first fire engine is within an average of six minutes and the second fire engine, when needed, within an average of eight minutes. In 2017, the average arrival for a first fire engine was five minutes 13 seconds. Not all incidents need multiple fire engines and about half of all incidents can be dealt with by a single fire engine. In 2017 the average arrival time for the second fire engine was six minutes 35 seconds. LFB get a fire engine to an incident within 10 minutes on more than 96 per cent of occasions, and within 12 minutes on more than 98 per cent.

10 LFB has statutory duties under the Civil Contingencies Act (2004) to ensure that appropriate arrangements are in place to respond to emergencies as well as maintaining core services. LFB has a range of specialist vehicles and equipment to respond to emergency incidents with the capability to deliver a co-ordinated response to a range of serious, significant or catastrophic incidents that have a national impact, including:

- Chemical, biological, radiological, nuclear (CBRN)
- Explosions
- Urban search and rescue
- Water and high volume pumping
- Command and control
- Emerging threats
- Road traffic accidents

11 Lord Toby Harris was commissioned by the Mayor to conduct a review of emergency service resilience in London in 2016. Lord Harris has said that LFB must be proactive about making sure London is prepared, and that each organisation must work seamlessly and be ready to react effectively, whatever the nature of the incident. Lord Harris’s review makes 127 recommendations for the Mayor, the government and other agencies to consider.

12 The review concluded that the current resources the LFB has to deal with a major terrorist incident, and even exceptional fire demand, are sufficient. The review also referenced Anthony Mayer’s review of resources, stating that the LFB should review the number of Fire Rescue Units (FRUs) it has and consider setting an attendance target for these units. It made specific recommendations for the LFB about co-responding, reaching an agreement with the Fire Brigades Union (FBU) on responding to a marauding terrorist firearm attacks (MTFA),
including asking the Home Office to consider supporting costs associated with an increased MTFA response.

13 As a global city, London is exposed to the threat of terrorism. While this is not a new threat to a city with the history and context of London, the unfortunate reality of the past few years has made terrorism a daily reality in all of our lives. As much as this is the case, Londoners and the public in general should be assured that the LFB has significant operational arrangements in place to deal with major incidents caused by terrorism, headed by a group of specialist officers.

14 After Lord Harris’s review was complete, a new London Safety Plan 2017 was agreed in April 2017. The London Safety Plan is the LFB’s Integrated Risk Management Plan (IRMP) which is required under the government’s national framework for the fire and rescue service. London Safety Plan 2017 sets out the four year vision to make the capital the world’s safest global city.

15 As part of developing the London Safety Plan 2017, the LFB looked at whether its stations are in the best places to optimise its speed of response. The majority of the LFB’s fire stations are in places that reflect the old national recommended attendance standards set by the government, which were abolished in 2004. Times have changed and so too has risk in London. For the last fifteen years, the LFB has worked to the principle of equal entitlement and aims to provide the same speed and standard of response across London for all types of emergency.

16 Lambeth Fire Station is located within the former HQ building and has two fire engines. It is one of four fire stations within the Borough of Lambeth and is an important part of the community.

17 Lambeth Fire Station plays a critical role in the response provided by LFB to fire and rescue incidents in the London Borough of Lambeth and across the river in Whitehall and Victoria. Its location is strategic to ensuring a consistent and fast response time to important areas in the Government Security Zone (Westminster area).

18 London Safety Plan 2017 also sets out a new ‘stations at the heart of the community’ theme under which LFB will introduce a community ethos for all stations. This is being done by working closely with the Mayor, blue light partners and local authorities, to identify a flexible
approach to the design of future fire stations that enables them to be community hubs. They will be able to address risk, prevention and response priorities in the local area, and can be used as typical stations and/or community hubs, combining the need for accommodation for large and small emergency vehicles with the potential for education centres or outreach offices.

2.0 History of Lambeth Fire Station

19 LFB Headquarters (HQ) on Albert Embankment was opened on the 21 July 1937 by King George VI. The building, designed by the LCC architect E.P.Wheeler FRIBA and assistant architect, G.Weald FRIBA, was built to replace the old headquarters building in Southwark. The original site was the scene of a fire in 1918 where seven fire fighters lost their lives.

20 The building was constructed with an appliance bay for seven fire engines, accommodation for officers and staff and a 10 storey high training tower. There was a rear balcony with seating for 800 people to watch weekly displays by the LFB, with music played by the LFB band from their bandstand. The building was elaborately designed with sculptures and with a memorial hall “to the memory of the officers and men of the LFB who throughout the years lay down their lives whilst doing their duty”. It is located next to the River Station for emergencies on the River Thames, which was also opened in 1937.

21 The site is in two sections on either side of Lambeth High Street. Historically the ground floor of the nine/ten storey building on the Albert Embankment provided operational facilities with the first floor designed for living quarters and recreation rooms for on-duty fire crews together with a London-wide control room. The upper storeys also contained the main administrative offices for LFB and numerous flats for fire officers and their families.

22 Across Lambeth High Street was the workshop block, home to the research and development section of LFB. The workshops accommodated garages and repair shops, stores and a training school complete with kitchens and more living quarters. Over the years the workshops produced many unique vehicles and pieces of equipment for LFB. The latest technology was used to design items that would help firefighters to fight fires and rescue lives.

23 The drill tower at Lambeth Fire Station was the first in LFB to be provided with an internal staircase and a dry rising main.
In 1939, in view of the impending war, an underground control room was built, which was responsible for mobilising appliances across London. On 29 December 1940, the control room mobilised 2,200 fire engines which dealt with 1,500 fires during a series of bombing raids that threatened to destroy the City of London. When peace was declared on 8 May 1945 London’s fire service had attended over 50,000 emergency calls and 327 firefighters had lost their lives.

A new control room opened on the basement site in 1966 and work on LFB’s new Command and Mobilising Control (CMC) commenced in September 1982; located to the east of the 8 Albert Embankment building.

The original site had also included a museum which was demolished for the building of the CMC. In 1966 the Museum moved to Winchester House in Southwark, where it operated until the doors closed in September 2015 in preparation for a move back to the Lambeth site.

3.0 Existing Lambeth Fire Station

Lambeth Fire Station (located within the former HQ building at 8 Albert Embankment) plays a critical role in the response provided by LFB to fire and rescue incidents in the London Borough of Lambeth and across the river in Whitehall and Victoria. Its location is strategic to ensuring a consistent and fast response time to important areas in the Government Security Zone (Westminster area). For instance, the area covered by Lambeth Fire Station had an average attendance time of four minutes forty-one seconds for the first fire engine and five minutes twenty-eight seconds for the second engine for all incidents attended in 2017. These times are set against the Londonwide target response times as set in the London Safety Plan to get the first fire appliance to an incident on average across London in six minutes and the second fire engine to an incident across London in eight minutes.

In addition, Lambeth Fire Station is strategically located to be able to respond to incidents at key transport locations.

At present, a third of LFB’s 102 land fire stations were constructed prior to 1940. The age of these is one of the most significant factors in their suitability, and a large number of our existing fire stations were originally designed for horse-drawn fire engines. Whilst much has
been done to catch up with the present station maintenance backlog, it is clear that further plans are needed for the replacement or refurbishment of the next tranche of ageing stock.

30 Fire stations are often located in very densely populated areas of London, on constrained sites. They can be expensive to maintain. For many of these older stations, improvements are required to provide appropriate accommodation for LFB employees, who deserve good working conditions and the equitable facilities needed in a modern fire and rescue service.

31 23 fire stations (roughly 23 per cent of the total) are listed or locally listed and/or in a conservation area. Although there are agreed guidelines for upgrading our fire stations with Historic England, any listing status still severely limits the ability to do this.

32 It is not always possible to simply upgrade or rebuild a fire station by decanting it, as operational cover has to be maintained during the construction period. Suitable sites are rarely available for temporary or alternative fire stations in the required location or timescale. They are also usually expensive as the site search area is limited and competition for sites is strong.

33 Lambeth Fire Station is one of the fire stations in the LFB estate that is affected by the challenges of its age, listed building status and difficulties of maintaining operations during development works (particularly in such an important location). It requires significant modernisation and needs to provide accommodation for new and larger LFB specialist vehicles.

34 Lambeth Fire Station has five usable appliance bays and supporting operational functions on the ground floor with amenity, administration and training facilities on the first and second floors. The upper floors above the fire station were built as firefighter residential quarters. In later years these were converted to office accommodation and became LFB headquarters. While these upper floors have been largely vacant since LFB moved to new headquarters, they have remained available for operational use to accommodate fire, and other agencies’ officers.

35 By 2007 the LFB HQ on Albert Embankment was spread across 8, 20 and 21 Albert Embankment. LFEPA (the fire and rescue authority prior to the LFC being created) then concluded that a relocation to new headquarters premises was required as the leases on Nos 20 / 21 were due to expire in 2008, the landlord for Nos. 20 / 21 indicated they would
not agree to a long term lease as they had plans for redeveloping the site, and as (the LFB owned) 8 Albert Embankment was not large enough alone to accommodate the headquarters. It was also identified that the premises at 8 Albert Embankment would not meet the developing needs for a modern fire service, and there was limited opportunity to deliver open plan space and up to date communications technology within the listed building. In 2008, LFB relocated to new headquarters premises at 169 Union Street in Southwark.

The workshop building was also vacated in 2008, although it had not been used as a vehicle workshop for a decade prior to that point. The workshop building has had a history of squatting since its vacation in 2008 and this resulted in significant legal, repair and clean-up costs. Security guards are employed to deter further squatting and nuisance to neighbouring properties. In April 2016, following a full and robust OJEU competitive dialogue and selection process (on the basis that any scheme was to include a re-provided fire station and a new museum), U+I were selected as LFB’s development partner. Four bidders took part in the final tender process, after a shortlisting exercise was carried out. Each final bid was evaluated against specified risk-based criteria and the U+I scheme came out as a clear winner, based on their financial standing, a demonstrable track record in delivering mixed-use schemes of this sort by means of public private partnerships, high quality proposals for Lambeth Fire Station and the LFB Museum, approach to consultation with all stakeholders, the likelihood of planning consent being granted for their scheme, and the price offered. Following the appointment of U+I, work began on the workshop’s conversion to interim uses, which were part of their bid. This included a temporary home of the LFB Museum, which opened in November 2016. Since then it has become a major part of the consultation process for the Proposed Development with local residents and interest groups. The workshop building is now in an active use for the benefit of local businesses and the community, and the temporary use of the building is permitted until 22 September 2019.

4.0 The Need for Improved Facilities

LFB carries out regular maintenance on 8 Albert Embankment, but a major refurbishment is required to ensure the listed building remains in a good state of repair and there is maximum compliance with the current operational requirements of LFB.
Whilst moving the office element from Albert Embankment involved significant upheaval, it provided an opportunity to consolidate the headquarters into a single premise at 169 Union Street. It is also provided an opportunity to release the latent value at 8 Albert Embankment, re-provide a fire station and museum, and reinvest in the rest of the LFB estate. It was originally envisaged that the proceeds from the sale would also fund the relocation into the new Union Street headquarters. However, this cost was funded from internal borrowing whilst the capital receipt was awaited, and the internal borrowing position continues to be reviewed and will be finalised as part of the plans for use of the capital receipt from the site.

The decision to sell the Albert Embankment site did not come lightly, not least due to the key position of Lambeth Fire Station. The fire station needs to remain on this site but it can only do so if it is substantially improved.

The current version of the LFB Standard Station Design Brief sets out size of spaces, building services requirements and the equipment and fittings needed with the aim of delivering a consistent standard of accommodation at all London fire stations and to be able to adapt to changing working practices and vehicle capacity. There are a number of ways the current Lambeth Fire Station does not meet the Brief, including:

- Insufficient area to accommodate new resilience vehicles and equipment inside. These are deployed to respond to highly specialised search and rescue incidents related to flooding, Chemical Biological Radiological and Nuclear (CBRN) and terrorist threats in the Government Security Zone.
- Insufficient covered area to wash down the appliances and carry out training.
- The watch room, fire gear and breathing apparatus rooms all need extra space to function properly.
- The gym on the first floor cannot facilitate a wide range of physical training.
- The general layout of the fire station building is inefficient (over three floors) and has no clear definition between the operational areas and the supporting facilities.
- Accommodation does not meet the level that LFB aspires to in order to support a diverse workforce and flexible working arrangement e.g. provide accommodation for women and varying numbers of men and women for each duty period over four watches.
- The existing building does not provide community engagement facilities.
- The very old facilities do not allow effective on-site training.
- The listed drill tower has limited training capacity due to its age and condition.
- The building services are at the end of their normal operational lives and are not energy efficient.
- The external building fabric is in poor condition and is costly to upkeep and repair, particularly due to its listed status.
The Proposed Development, designed by Pilbrow & Partners, the architects U+I have commissioned, provides four refurbished appliance bays within the listed building, a covered wash area to the rear and a new build stepped single to three storey extension adjoining the drill tower to the south of the drill yard, with a new entrance for the public from Albert Embankment. Specifically, the scheme will address the deficiencies outlined above and permit the key criteria of the LFB Standard Station Design Brief to be accommodated as follows:

- Four fire engines in the existing bays with resilience vehicles in the covered area open to the drill yard.
- More flexible space to support a diverse workforce and the changing working practices of a 21st century fire service.
- Modern and energy efficient facilities for staff and community engagement.
- New amenities, resting and changing facilities to provide an appropriate level of privacy to all fire-fighters.
- New gym and operational facilities.
- New building services, redecoration internally and externally.
- 10 car parking spaces, including one disabled car parking space.
- The original drill tower will be repaired and brought back into use as an effective and up to date training facility.

A new prominent entrance to the fire station from Albert Embankment will provide pedestrian access to community facilities. The existing listed drill tower is to be refurbished and brought back into full usage within an external training area. The Proposed Development will also provide a new museum which will incorporate the listed historic Memorial Hall and maintain a synergy with the working fire station.

The Proposed Development will bring Lambeth Fire Station up to the standard expected for a 21st Century fire station and is essential for making it fit for purpose in the future. To make this possible it will be necessary for the station to close for part of the period of construction. LFB have reached an agreement with U+I that the fire station would be closed for the minimum possible period for the construction to go ahead (approximately 18 months) as part of Phase 1 of the Proposed Development.

LFB has plans in place to make sure that fire cover is maintained at a good level during this time through temporarily relocating staff, vehicles, and specialist equipment to other local fire stations. LFB has recent experience of maintaining fire cover in this way from the redevelopment of nine new fire stations between 2013 and 2016 as part of the LFB PFI.
Property Project, and it worked well. LFB are planning to temporarily relocate Lambeth Fire Station’s pump ladder and pumping appliance (fire engines) to Chelsea and Clapham fire stations. Modelling work has indicated that these are the optimal locations to maintain fire cover across London and locally. The modelling showed that during the relocation there is expected to be a three second increase in the London-wide average attendance time for the first fire engine and no impact on the London-wide average attendance time for the second fire engine. The table below shows the predicted impact on average attendance time in Lambeth and other impacted boroughs - in all of these boroughs average attendance times remain well within the six and eight minute targets.

**Table 1: current average fire and second fire engine attendance times alongside modelled impact of temporary relocation from Lambeth to Clapham and Chelsea fire stations**

<table>
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<th>Borough</th>
<th>Actual performance (mm:ss)</th>
<th>Modelled impact (mm:ss)</th>
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<tr>
<td></td>
<td>2014/15</td>
<td>2015/16</td>
</tr>
<tr>
<td><strong>First appliance</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>London-wide</td>
<td>05:27</td>
<td>05:32</td>
</tr>
<tr>
<td>Kensington and Chelsea</td>
<td>04:40</td>
<td>04:44</td>
</tr>
<tr>
<td>Lambeth</td>
<td>04:40</td>
<td>04:51</td>
</tr>
<tr>
<td>Southwark</td>
<td>05:27</td>
<td>05:31</td>
</tr>
<tr>
<td>Wandsworth</td>
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</tr>
<tr>
<td><strong>Second appliance</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>London-wide</td>
<td>06:48</td>
<td>06:51</td>
</tr>
<tr>
<td>Kensington and Chelsea</td>
<td>06:13</td>
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As set out above, this temporary disruption will be minimised as much as possible and is necessary to reap the longer term benefits this development will bring to the operations of LFB and making London a safer city.

5.0 The new LFB Museum

The LFB’s vision for the new museum is to shape it into a recognised historical and educational resource that commemorates and inspires pride in London and LFB’s unique
firefighting and rescue heritage. It is to be a museum that explores how the LFB’s past continues to influence its future and will safeguard an internationally significant collection through research, conservation, documentation and curatorship. It intends to increase its interactive and contemporary content and extend its appeal to a more diverse audience. Through fire safety education, the museum will support LFB in making London a safer city.

47 The proposed design will enhance the way the museum presents the tradition behind the LFB and its modern fire and rescue operations by incorporating the historic memorials and providing views and/or the ability to access into the adjacent working fire station.

48 Flexible exhibition space, storage, administration and catering facilities have been provided. It uses three of the old appliance bays for display of heritage fire engines which are part of the Museum collection.

49 The Proposed Development will include a shell and core/Category A construction of the museum, (stairs, lift, walls and building services). The Category B fit-out of the spaces will be provided later.

50 The Pilbrow & Partners design for 8 Albert Embankment includes the separation of the Museum from the adjacent fire station by a glass wall at ground floor level, so that Museum visitors will have the benefit of being able to see through into the operational fire station’s vehicle bays, with their state of the art modern vehicles and offering a glimpse of the day to day activities of the firefighters. The co-location of the Museum on this scale with a working fire station will be a unique offering in the UK and is an important element of the project.

51 The new LFB Museum will be conveying many important and serious messages about fire safety as well as providing an important historical account of the evolution of firefighting. The opportunity to present these messages in a purpose designed museum with visual links through to a working fire station will help to ensure that the learning process is delivered in a thorough but interesting, enjoyable and fun way. The LFB Museum has an existing programme of education work with a number of direct links to the National Curriculum through Key Stages 1, 2 and 3, starting with the Great Fire and moving on to fire safety in the home today. The Museum has an established track record in attracting school groups, and with greater facilities, as proposed at the new Museum, should readily be able to build their school visit numbers. The development of this new Museum is very much focused on making the most of this opportunity to maximise the opportunity to deliver safety messages...
and advice in effective and innovative ways, to audiences that are hard to reach in other ways.

52 The Museum team is currently carrying out on-going research into the activity programming that the new LFB Museum should offer. This work is being greatly helped by the pilot activities being staged in the ‘Pop-Up’ Museum, funded by U+I at the Workshop, where a programme has been undertaken from 2017 to 2019 to pilot a range of activities to gauge public interest in them and assist in planning for the new Museum. These have included family days, events promoting mental health awareness, a virtual reality experience and more active use of the archive and photographic collection.

6.0 The Benefits

53 In any major project undertaken by LFB, funding is tightly constrained.

54 Although the LFB’s Capital Programme to support all strategic and operational objectives has been under pressure, it has provided investment for selected refurbishment and redevelopments of stations. The LFB has successfully realised significant funding through; (i) the sale of former fire stations closed under the London Safety Plan (LSP5) in 2014, (ii) rent from surplus office space in 169 Union Street, and (iii) secured PFI credits (£51.5m) to build nine new fire stations.

55 The land receipt will be utilised to support the LFB’s Capital Programme, thereby reducing our need to borrow levels and so avoid the resulting revenue costs of servicing the debt. The Capital Programme is the means by which the LFB funds much needed improvements to fire stations, vehicles and equipment throughout London. Our Asset Management Plan (AMP) 2017 sets out the priorities for investment in our fire stations and other properties, from time to time. Brixton and Clapham fire stations are both identified in our current AMP as requiring significant projects or works to be undertaken.

56 Without the capital receipt from the sale of 8 Albert Embankment, LFB would have to obtain additional external borrowing to fund the future capital programme. This in turn would be a further revenue financial pressure, at a time when there is an underlying budget gap of £10.2m as detailed in LFC-0031- Provisional Outturn Report for 2017/18. Despite the fact that London’s population size and profile, key factors in the distribution of fire stations and fire engines, is changing in both size and complexity, LFB has not received any financial
contributions via section 106 agreements or community infrastructure levy receipts in order
to improve its ability to respond to the changes to the built/social environment.

It was therefore extremely important that the sale was made to a purchaser who would be
prepared to provide LFB with a new modern fire station for Lambeth, whilst preserving the
history of the old HQ building, especially the memorial hall, and providing a design for the
museum which provided the synergy between all three functions. It was also important that
LFB is able to utilise a return from the Proposed Development for much needed investment
in other fire stations, a new Training Centre in Croydon and an improved logistics solution
for operational equipment and consumable warehousing and distribution.

The procurement process for the sale of Albert Embankment has been lengthy. LFB has
already had to deal with substantial delays in terms of the receipt for the sale proceeds
principally due to the very protracted period associated with an unsuccessful planning
application by the previous preferred bidder that went to appeal. The original plan to fund
the HQ relocation from Albert Embankment was based upon an assumption that the
additional borrowing required for this would be offset by a corresponding reduction in
borrowing in later years as a result of the capital receipt. This has also been significantly
delayed, and has resulted in additional capital financing costs. Completing the sale of Albert
Embankment will generate a receipt which will allow us to make further essential
investment in our estate whilst limiting our borrowing and associated revenue costs. This is
essential given the projected underlying savings requirement in excess of £10m over the
next four years and the investment required in the LFB estate as set out in the Asset
Management Plan.

**6.0 Public Benefits Associated with the U+I Scheme**

In preparing our operational strategies, LFB is mindful of how London will change over the
coming years. The Mayor’s spatial development strategy, the London Plan, identifies
Waterloo and Vauxhall Nine Elms Battersea as development opportunity areas. Lambeth Fire
Station will provide flexibility in considering what impact these opportunities may have on
LFB services. This is likely to mean increased focus on prevention and protection, requiring
facilities to engage with the local community. The existing station is ideally located for this
purpose and the new fire station will provide a welcoming and accessible facility for the
community and a complementary presence for the memorials in the listed front building.
The new LFB Museum will be available for local residents to visit and enjoy. The Museum is being designed to attract new visitors from around London and further afield, bringing these people to the area who are likely to spend time and money at businesses in the locality. The Museum will also provide skilled jobs and volunteering opportunities.

We must be able to respond to fires and other types of incidents which will still occur at the same time as we are dealing with one or more major incidents e.g. terrorism, flooding and CBRN (chemical, biological, radiological and nuclear) hazards. If any of these events do happen, the public will expect us to be there as soon as possible to help and save lives and reduce the damage that they are causing. The proposed new fire station for Lambeth will enable us to be prepared for these eventualities from a modern facility and one that is strategically located to achieve fast response times to these emergency incidents.

LFB’s capital programme to support strategic and operational objectives is no longer funded from capital grants. Therefore capital receipts can provide a major source of capital funding, and help reduce the call on external borrowing, and the implications this has on the revenue budget. The redevelopment of Albert Embankment is seen by LFB as a key opportunity to provide a refurbished fire station and a flagship Museum (self funded through the sale of the premises) and to fund other new or refurbished fire stations in the local area, as set out in the Asset Management Plan, whilst limiting the need for external borrowing. LFB completed the new Millwall fire station in 2005 on a similar basis, where it was entirely funded by the private sector providing a new fire station and a capital receipt that was able to be reinvested in other parts of the estate, including new fire stations at Walthamstow, Harold Hill and West Norwood.

7.0 Summary and Conclusions

Lambeth Fire Station is strategically important to LFB due to its position, not only within Lambeth, but also so close to the Palace of Westminster and key central government buildings. However it is in poor condition and no longer meets our operational requirements. It can therefore only continue to stay operational if it is substantially improved. The procurement process which was initiated in 2015 had the re-provision of Lambeth Fire Station at its heart. Hence, any development of the site must contain a re-provided fire station.
The new LFB Museum will be a unique local cultural asset and attraction. It will deliver new experiences and learning about the fire and rescue service now and in the past and help make London a safer place, from the heart of Lambeth. It will also provide skilled jobs and volunteering opportunities in the area.

The Proposed Development will allow us to continue to provide a fire station and Museum at this strategically important location as well as regenerating a site that has largely been under-utilised now for nine years.

Local residents will benefit from a new state of the art fire station and Museum on their doorstep as well as improvements to this landmark building, which will retain its originally intended use. The successful completion of this development will also provide essential funds that can be invested into other areas of the LFB estate as set out in the Asset Management Plan.

LFB remains committed to delivering high quality design, an operationally efficient fire station, a new and exciting experience through the new Museum, and a scheme that is sensitive to the listed status of the building. This will assist in ensuring progressive improvement in fire prevention and fire and rescue services, not only within Lambeth, but across London. This can all be delivered by the proposed U+I scheme.
Appendix 5  Letter from Notting Hill
Genesis
8 Albert Embankment

Notting Hill Genesis
Notting Hill Housing and Genesis Housing Association merged in April 2018 to create Notting Hill Genesis (NHG). We own and manage 65,000 homes across London and the south east making us the third largest housing association in London and the fifth largest in the UK.

Partnership with U+I
NHG has a long track record of working with private sector partners to realise exciting development opportunities that have delivered thousands of new affordable homes and substantial community benefits. U+I and NHG have a working relationship that spans almost a decade, a partnership that was formed in 2010 when we first came together on the multi award-winning scheme, Clapham One. NHG was able to secure a much needed £18m in kick-start funding from the then HCA, helping to unlock U+I’s vision for an exemplar mixed use development including private and affordable homes alongside new library and leisure centre facilities.

Our partnership has evolved into Triangle London Developments, a joint venture focussed on delivering development opportunities brought forward through TfL’s Property Partnership Framework, a key part of the Mayor’s strategy to boost affordable housing supply in London. Our ability to work in a complementary way has been a key strength of our consortium which has secured three of the first four sites to be released through the Framework.

In essence, U+I and NHG have a long history of joint working based on trust and a shared desire to maximise benefits to the communities we work in.

NHG in Lambeth
NHG has a long-standing relationship with Lambeth and remains one of the few Registered Providers with an active development programme in the Borough. Lambeth is one of NHG’s principal centres of operation and we manage over 3,600 homes in the Borough, over two thirds of which are provided for Social Rent. We have six ‘live’ schemes in development in the Borough ranging from those that are in the final stages of completion and occupation to those that have been recently acquired.
8 Albert Embankment (8AE)

NHG has been working collaboratively with U+I in devising the affordable housing proposals for 8AE with a view to maximising affordable housing provision whilst maintaining overall financial viability.

As well as delivering a scheme that makes a genuine contribution to meeting evidenced housing need, we have been keen to ensure the affordable housing is designed and specified in a way that creates both attractive, comfortable homes for the new residents but also facilitates effective and efficient housing management.

Our work with U+I on this project has manifested in a variety of ways, as outlined below.

**Affordable Housing Tenure**

We have been working with U+I to devise the most appropriate all-round response to affordable housing tenure. We believe Shared Ownership offers the most viable solution to the requirement for intermediate accommodation. The revenues generated by alternative intermediate solutions (such as London Living Rent or Intermediate Market Rent) would be markedly lower, impacting viability and leading to a decrease in overall affordable housing provision.

The Social Rent units would be delivered in line with the LB Lambeth Tenancy Strategy.

**Mix**

We have looked carefully at an appropriate mix of accommodation given the specific context of the site in a dense urban environment close to the River Thames. We have also considered carefully the Local Authority’s requirements as set out in its Strategic Housing Market Assessment from 2017, particularly the emerging priority requirement for two bedroom accommodation:

4.4. The highest proportion of need not met, and highest number required, is for 2 bed units. This reflects a large number of newly formed households generally requiring accommodation for a lone parent and young child.

NHG’s original assessment of the draft proposal was that the Social Rent mix contained an oversupply of one bedroom accommodation and insufficient two bedroom accommodation. We also felt the number of three bedroom units could potentially be higher, although we have been keen not to encourage a large increase in three bedroom accommodation as we do not believe the location best serves this need. Whilst we would usually look for higher levels of larger family accommodation in less central locations, our experience on other schemes in inner London has shown that it is best practice to moderate child density, particularly with low parking and in terms of managing a high density mixed tenure scheme.

Within the Intermediate mix, a number of studios have been included. We have worked hard to ensure these can sensibly accommodate a double bed and all floor areas comply with London Plan as a minimum.

The affordable units have been distributed across the scheme to maintain a social balance. For example, the East Garden Building accommodates private, intermediate and affordable/social rented units. Within the building, a horizontal separation of tenures has been maintained. NHG’s
experience is that this creates a transparent separation in terms of service charges and helps makes these charges as affordable as possible for the Social Rented units.

Affordability
Across the affordable offer, a range of household incomes are provided for. The application of LB Lambeth Tenancy Strategy rents means the Social Rented units will offer a financially accessible and sustainable solution for incoming residents. One and two bedroom units will have rents at eighty percent of market rent but capped at Local Housing Allowance levels, whilst three bedroom units will be offered at Target Rent levels, ensuring low income families will have a financially stable and secure home.

The Shared Ownership homes have been appraised to ensure households with a range of incomes are able to access the opportunity to purchase at 8AE, in line with London Plan affordability criteria. Furthermore, and following dialogue with Lambeth, 10 homes have had their rents and shares reduced further to be affordable to household incomes of £60,000, with tiered affordability levels on the remaining Shared Ownership homes. Values here are typically above levels at which Help to Buy would be able to assist, so Shared Ownership makes home ownership a possibility for medium income households in an otherwise inaccessible context. Affordability for this tenure in this location drives our brief for smaller Shared Ownership units.

Design
U+I invited NHG to comprehensively re-visit the design of the affordable housing provision within the scheme, giving us full access to their design team. NHG’s Design Manager has participated in a number of very productive sessions with the design team, Pilbrow + Partners and MSMR, including a joint design workshop. NHG’s operational teams have also been involved to ensure the practicalities of managing a scheme of this nature are integral to the design concept. Typically, our work with U+I has focussed on the following aspects of design.

• Unit Floor areas
  We have undertaken a rigorous review of floor areas. We have worked hard to drive out inefficiency from the design and minimise service charges. In other areas we have focussed on ensuring wheelchair accommodation can genuinely accommodate households containing a wheelchair user. Where there is no private external amenity space, additional internal space has been provided in lieu and we are satisfied this is appropriate in this Inner London location. All users will also have access to communal amenity areas.

  The studio flats in the Intermediate provision have been re-worked to provide an optimised configuration and comfortably accommodate a double bed, ensuring the widest possible market for this unit type and assisting more people into home ownership at an affordable level.

• Kitchen/Diners
  On the basis of feedback from our residents we have, where possible, incorporated separate kitchen/diners within larger family units, providing a format which is both more versatile and potentially safer than open-plan kitchen/living room /diner layouts, particularly where there are a number of young children in a household.
• Fire Safety
   All units will have sprinklers in this development and external wall construction will be of limited combustibility, regardless of height. We go beyond current Building Regulations requirements for fire safety which is NHG’s policy for new developments post-Grenfell.

• Shared Amenity
   NHG has worked closely with U+I on the shared amenity and play space provision in the evolving design and we are satisfied that the current design balances policy requirement, affordable service charges and resident amenity.

To conclude, we have welcomed U+I’s collaborative approach in ensuring NHG’s and our residents’ needs are met in terms design, specification, and affordability. We support the evolution of the scheme to the current design and would be very happy to answer any questions in connection with this.

Kind regards,

Paul Pearce
Director of New Business