

Good Growth

██████████
London Borough of Lambeth
By Email

Our ref: 2022/0645/S1
Your ref: 22/02489/FUL
Date: 07 October 2022

Dear ██████████

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

99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London, SE1 8UL

Local Planning Authority reference: 22/02489/FUL

I refer to the copy of the above planning application, which was received from you on 25 August 2022. On 07 October 2022 Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority, considered a report on this proposal, reference 2022/0645/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that, whilst the application is supported in principle, the scheme does not yet fully comply with the London Plan for the reasons set out in paragraph 108 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is [REDACTED]
[REDACTED]

Yours sincerely

[REDACTED]

Head of Development Management

- cc [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Waterloo Central and Mercury House

Local Planning Authority: Lambeth

Local Planning Authority reference: 22/02489/FUL

Strategic planning application stage 1 referral

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

The proposal

Office-led mixed use development comprising the demolition of 99-101 Waterloo Road, 103-107 Waterloo Road, 124 and 126 Cornwall Road; the construction of a new office building with flexible ancillary uses; the retention and refurbishment of Mercury House for flexible commercial uses and associated works including public realm, highway landscaping.

The applicant

The applicant is **Grandseal and Connect Properties** and the architects are **Buckley Gray Yeoman** and **MATT**

Strategic issues summary

Land use principles: The scheme would provide a significant increase and enhancement in office floorspace provision within the CAZ and the Waterloo Opportunity Area, together with affordable workspace and SME co-workspace. This is strongly supported.

Urban design and heritage: The layout, design, architectural and materials quality of the scheme is supported. The location is identified as suitable for tall buildings and the visual, function, environmental and cumulative impact could be, on balance, acceptable. The proposal would not harm any LVMF strategic views or impact the Palace of Westminster World Heritage Site. A low level of less than substantial harm would be caused to nearby designated heritage assets. This could be outweighed by public benefits, subject to these being secured. Further discussion is required in relation to public access. Further details and clarification is required on the green walls and building integrated solar panels in terms of fire safety, irrigation, maintenance and solar glare.

Transport: Further assessment of the development impact on pedestrian routes and public transport services is required, along with contributions to active travel enhancements, Cycle Hire and Waterloo station.

Climate change and environmental issues: The energy and urban greening strategies are supported, subject to further information and discussion on some of the technical details relating to district heating and mechanism for securing carbon offset payments.

Recommendation

That Lambeth Council be advised that whilst the application is supported in principle, it does not yet fully comply with the London Plan for the reasons set out in paragraph 110. Possible remedies set out in this report could address these deficiencies.

Context

1. On 25 August 2022 the Mayor of London received documents from Lambeth Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following categories of the Schedule to the Order 2008:
 - *Category 1B(c) - "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."*
 - *Category 1C(c) "Development which comprises or includes the erection of a building of more than 30 metres high and is outside the City of London."*
3. Once Lambeth Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

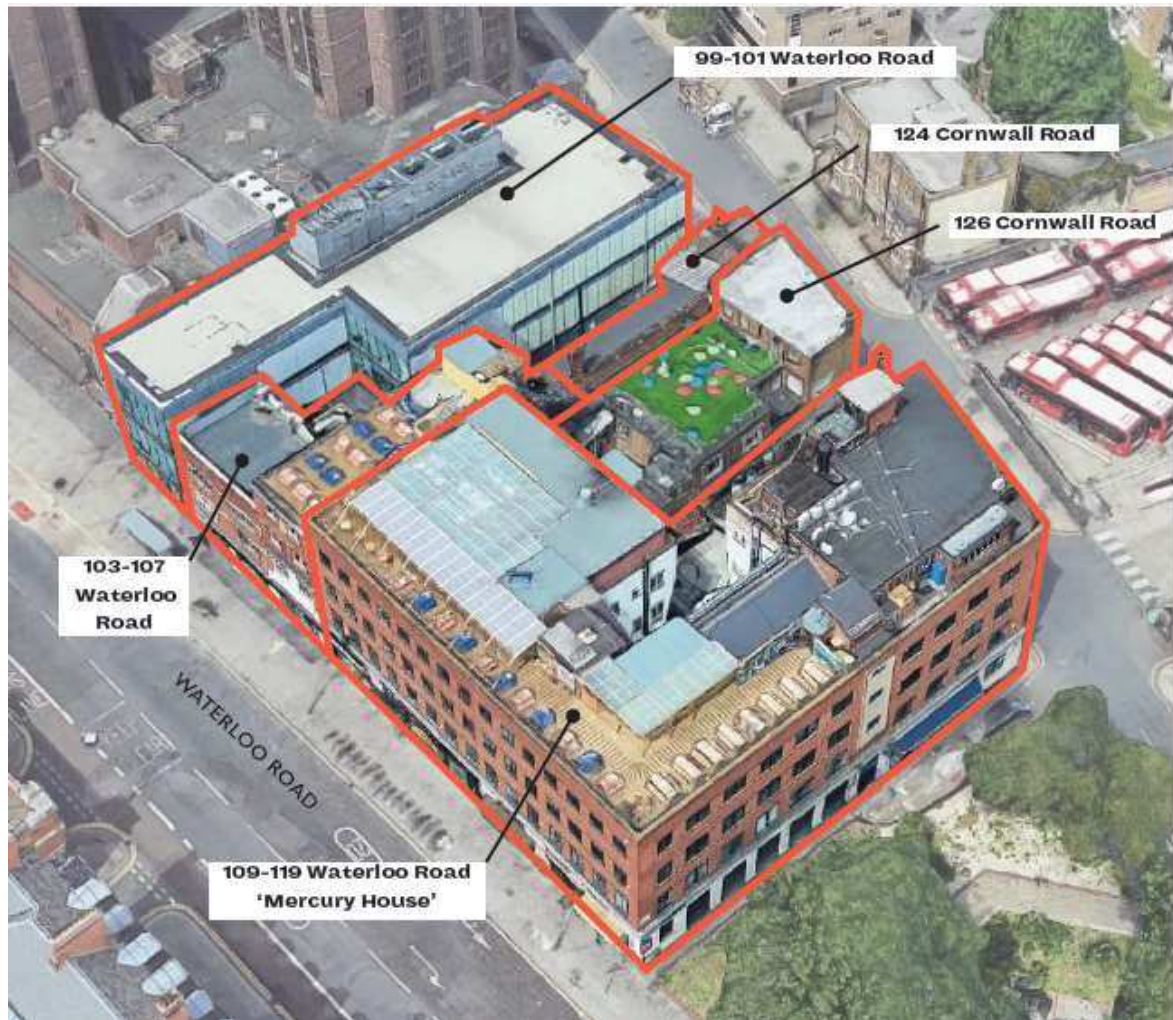
Site description

5. The site is 0.27 hectares in size and is located opposite Waterloo Station and falls within the Waterloo Opportunity Area and Central Activities Zone. The site is bounded by Waterloo Road to the west; Emma Cons Gardens and The Cut to the south; and Cornwall Road to the east. To the north, the site is bounded by the Union Jack Club and Capital Tower (91 Waterloo Road). Currently, the site contains a number of existing buildings which range in height and age as summarised below:
 - **Mercury House (109 to 119 Waterloo Road)** - a four-storey red brick building constructed in the 1950s which is occupied by retail and restaurant uses at ground and basement level and office floorspace on upper levels, together with a rooftop level bar.
 - **99-101 Waterloo Road** – a three-storey mid 1990s building clad in metal and glass which is occupied by a Sainsbury's Local convenience food retail store at ground floor level and office floorspace above which has a rear service yard.
 - **103-107 Waterloo Road** – three and four-storey buildings varying in age from mid-20th century to late Victorian which are currently occupied by a Tesco Express convenience food retail store at ground floor level and office floorspace above. Due to ownership issues, the application excludes 109

Waterloo Road which is a ground and basement unit currently occupied by a hairdressers.

- **126 Cornwall Road** – a three-storey brick clad building in office use dating from circa 1925.
- **124 Cornwall Road** – a red brick industrial building dating from circa 1925 which is in office use.

Figure 1 – Existing buildings within the site



6. The site does not include any statutory listed buildings or locally listed buildings and is not within a conservation area. However, the proposed development is within the setting of the following designated heritage assets:
- the Roupell Street Conservation Area and the Waterloo Conservation Area is to the north; the Mitre Road and Ufford Street Conservation Area is to the south; the Lower Marsh Conservation Area is to the west; the South Bank Conservation Area is to the north west.
 - to the south is the Grade II* listed Old Vic Theatre; the Grade II listed Royal National Theatre Studio; and the Grade II listed facade of 133 to 155 Waterloo Road.
 - to the west is the Grade II listed former Waterloo Road Fire Station.

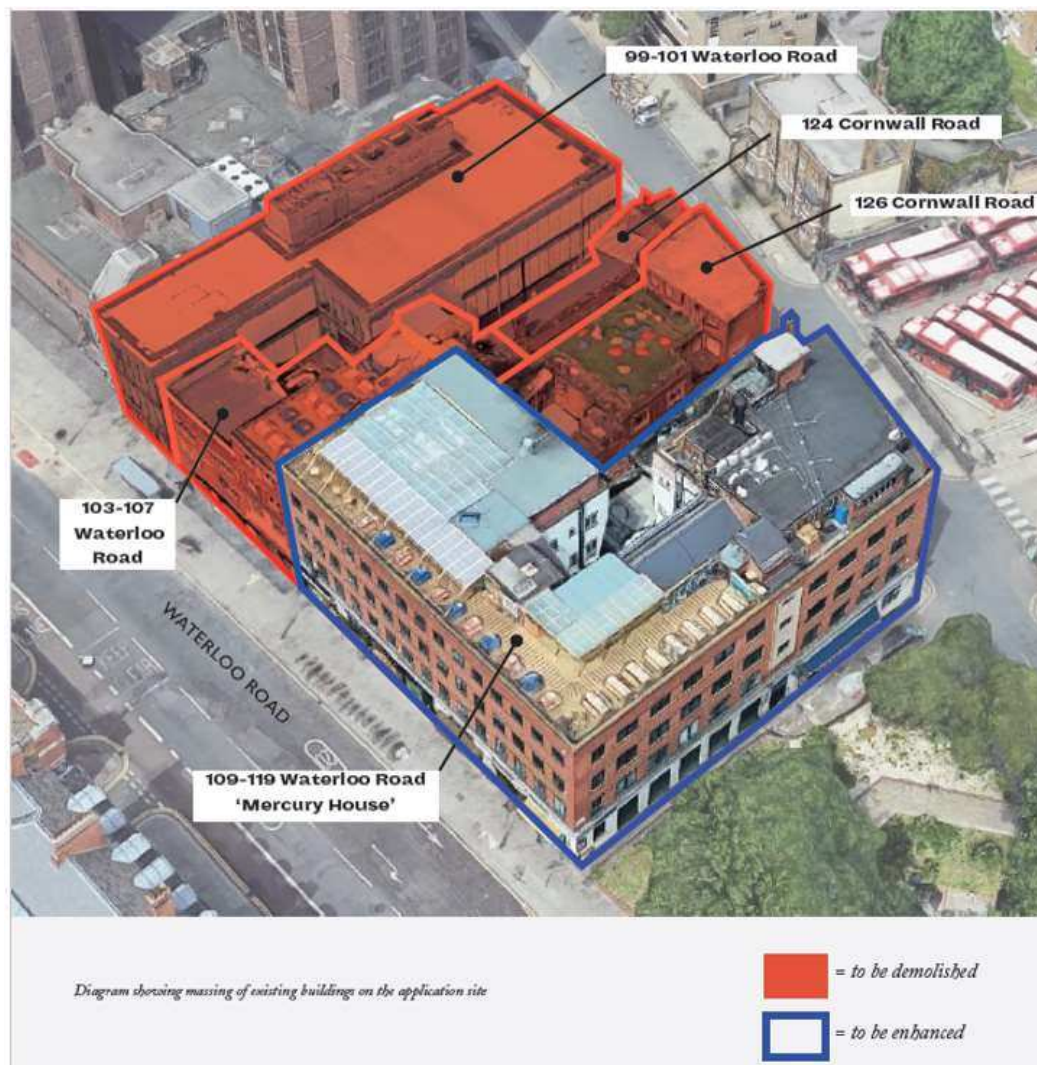
- the Roupell Street Conservation Area to the north includes a number of Grade II listed buildings (Numbers 1 to 24, 26 to 42, 43 to 61, 62 to 72 and 73 Roupell Street; the Kings Arms Public House; 22, 23 and 25 Cornwall Road; Numbers 5-21, 2-18, 20-30, 23 and 37 Whittlesey Street; and 1-9 Threed Street).
 - further to the north are the Grade II* listed Church of St John with All Saints with associated Grade II listed tombs and railings; the Grade II listed 5 Whichcote Street; the Grade II listed Waterloo Station (Victory Arch).
7. The Site falls within the following London View Management Framework (LVMF) townscape views from Parliament Square (LVMF views 27 A.1 and 27 A.2).
 8. In terms of the surrounding context, the Old Vic Theatre is directly opposite the site to the south. To the east is a bus garage and the OCCC estate which is undergoing phased demolition and redevelopment as part of an approved residential-led scheme with heights of 9 to 11-storeys (LPA ref: 16/06172/FUL). To the north is the Union Jack Club and Capital Tower complex which was constructed in 1976 and contains three towers ranging in height from 10, 16 and 20-storeys which are situated on a podium. The Union Jack Club provides short-term let accommodation with over 260 rooms for serving and ex-serving military personnel in the British Armed Service with associated restaurant, bar and function room facilities. Capital Tower comprises an office building and the podium is in use as a conference venue.
 9. The Waterloo OA includes a number of nearby development sites which are subject to site allocations and planning applications. This includes:
 - Southbank Place (Shell Centre) – mixed use redevelopment comprising office, retail, leisure, community and 877 residential with heights of 5 to 37 storeys alongside the retained Shell Centre Tower (constructed).
 - Elizabeth House – planning permission for office led mixed use redevelopment of 12-31 storeys (19/01477/EIAFUL)
 - London Television Centre (60-72 Upper Ground) - mixed-use redevelopment comprising offices, cultural spaces and retail uses with associated public realm and landscaping with heights ranging from 6, 14 and 25-storeys (21/02668/EIAFUL). This application is now subject to a Secretary of State call-in direction.
 10. The site has a Public Transport Access Level (PTAL) of 6b, on a scale of 0 to 6b, where 6b represents the greatest level of access to public transport services. The eastern entrance to Waterloo station is opposite the site, where access to National Rail and London Underground services (Bakerloo, Jubilee, Northern and Waterloo & City lines) can be accessed. Waterloo East National Rail station is also within 100m of the site. Bus services can be accessed from stops immediately adjacent to the site on Waterloo Road. The A301 Waterloo Road forms part of the Strategic Road Network (SRN) and Cornwall Road comprises part of Cycleway 10.

Details of this proposal

11. The application seeks full planning permission for the following:

- the demolition of the following existing buildings (shown red in Figure 3 below):
 - 99-101 Waterloo Road
 - 103-107 Waterloo Road
 - 124 Cornwall Road and
 - 126 Cornwall Road
- the construction of a new 20-storey office building (up to 73.9 metres AOD) with two basement levels comprising 26,476 sq.m. of office floorspace, including associated ancillary flexible commercial floorspace at level 4. In addition, a small unit (123 sq.m.) would be provided on Cornwall Road, in flexible Class E commercial use.
- Mercury House (109-119 Waterloo Road) would be refurbished to provide a mix of flexible commercial retail, food and drink, and office use falling in Class E a, b, and g uses. The floorplans show flexible commercial uses on ground, basement and first floor level with office use on level 2 and 3.

Figure 3 – demolition and retention



Case history

12. The proposals were not subject to any GLA pre-application meetings or advice.

Strategic planning issues and relevant policies and guidance

13. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Lambeth Local Plan (2021); the London Plan (2021); and the South Bank & Waterloo Neighbourhood Plan (2019).
14. The following are relevant material considerations:
- The National Planning Policy Framework and National Planning Practice Guidance.
 - The National Design Guide and the National Model Design Code.
 - The Palace of Westminster World Heritage Site Management Plan (2007)
 - Waterloo Area SPD (2013)
 - Lambeth Affordable Workspace SPD (2022)
15. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

*Land use principles
including CAZ, offices,
opportunity area*

London Plan;

*Urban design and
heritage*

*London Plan; Character and context SPG; Fire
Safety SPG; Public London Charter LPG;*

LVMF strategic views

London Plan; LVMF SPG;

Inclusive design

*London Plan; Accessible London: achieving an
inclusive environment SPG;*

Transport

*London Plan; the Mayor's Transport Strategy;
Sustainable transport, walking and cycling draft
LPG;*

*Climate change and
environment*

*London Plan; Circular Economy Statements
LPG; Whole-life Carbon Assessments LPG; 'Be
Seen' Energy Monitoring Guidance LPG; London
Environment Strategy; Urban Greening Factor
draft LPG; Control of dust and emissions during
construction and demolition SPG; Air Quality
Neutral draft LPG.*

Land use principles

16. Whilst the site is not allocated for any specific use in the Lambeth Local Plan (2021), it is identified specifically as a development opportunity site in the Waterloo Area SPD. The SPD provides site specific guidance on the redevelopment of the site in terms of design, layout, heights, land use and public realm. As noted above, the site falls within the CAZ and Waterloo Opportunity Area. It is also located within the CAZ Retail clusters designation and Lower Marsh / The Cut / Leake Street Arches Special Policy Area as set out in the Lambeth Local Plan.

Office floorspace provision

17. The application proposes a substantial quantitative increase and qualitative improvement of office floorspace which is supported, in accordance with London Plan Policies E1, SD4 and SD1. The new office tower would provide 26,476 sq.m. of modern, flexible office floorspace. In addition, the retention and refurbishment of Mercury House which would also result in upgraded office floorspace on Levels 2 and 3 of the building. This would be targeted at micro, small and medium sized (SME) businesses and would include affordable workspace, as set out in more detail below.
18. Level 2 of the tower would also provide managed co-working space suitable for small and start-up companies and freelance workers. The second floor would include a conference / rehearsal space with a stage as well as separate rehearsal studios. This would be linked to the office provision within Mercury House in terms of access and management. The overall net office floorspace provision is set out below. The design and floorspace arrangement would ensure appropriate provision for a range of flexible workspace or smaller units for micro, small and medium sized businesses, in accordance with London Plan Policy E2.

Table 1 - Existing and proposed office floorspace sq.m. (GEA)

	Existing	Proposed	Net change
Main site	2,851	26,476	+23,625
Mercury House	3,028	2,533	-495
Total	5,879	29,009	+23,130

Opportunity area context

19. The overall development and land use approach is in line with the principles set out in the Waterloo Area SPD. The proposals would make a significant contribution towards achieving the development capacity expectations set out in the London Plan for the Waterloo Opportunity Area in terms of jobs, in line with London Plan Policy SD1. The applicant's employment and skills strategy estimates that the development could support a total of 2,570 jobs (+1,995 net additional jobs). The scheme would contribute towards the ongoing regeneration of the Waterloo Opportunity Area and the objectives set out in London Plan Policy SD1.

Affordable workspace provision

20. Affordable workspace is required in line with London Plan Policy E3 because Lambeth has an adopted Local Plan policy requiring affordable workspace in this location on office schemes of this size. The Local Plan Policy requires affordable workspace to be provided at 50% market rent for a period of 15 years. The required quantum of provision should equate to 10% of the total net internal area (NIA). This requirement only applies to the uplift in office floorspace on site.
21. The applicant has committed to providing 10% of the net uplift in office floorspace as affordable workspace in line with the Local Plan requirements with 1,627 sq.m. of affordable workspace proposed in the refurbished Mercury Building. The workspace would be managed by the applicant who currently manages workspace in London.
22. Lambeth Local Plan Policy E3 sets out a range of requirements in terms of management and provision of affordable workspace, monitoring and phasing which should be complied with and secured. Service charges should be set at a reasonable level to ensure the affordability of the affordable workspace. Subject to the proposals being secured via S106 agreement, the approach to affordable workspace provision is acceptable and accords with London Plan Policy E3.

CAZ commercial retail and night time economy uses

23. London Plan Policy HC6 sets out the Mayor's aim to support and diversify the night-time economy particularly within the CAZ. London Plan Policy SD4 seeks to promote and enhance the concentration and diversity of night time economy functions within the CAZ.
24. Whilst the site is not located within a town centre, the London Plan identifies the Waterloo CAZ as a retail cluster. Lambeth's Local Plan seeks to optimise the Waterloo area's potential for town centre uses, including safeguarding and promote the role of Lower Marsh/ The Cut/Leake Street Special Policy Area as a centre for local needs and ensure appropriate provision of retail and food and drink uses within this area.
25. The site currently includes a range of commercial retail and restaurant uses at ground floor level, as well as an outdoor roof top bar. The proposal would include replacement flexible Class E floorspace within Mercury House at basement, ground and first floor level. A large Class E unit is also proposed within fourth floor of the office tower which would be accessed via the lobby and core of this building. This would spill out onto the rooftop garden above Mercury House. There would also be a small cafe unit fronting Cornwall Road at ground floor level.
26. The overall scale of flexible commercial floorspace provision is supported and does not raise any strategic planning concerns. However, GLA officers recommend that the quantum of evening economy uses in either Class E b food and drink and/or drinking establishment use (Sui Generis) should be secured by condition. It is noted that the floorplans submitted suggest Class E / Sui Generis use, however, the latter is not specified in the description of development. This should be clarified and amended accordingly.

Conclusion – land use principles

27. In summary, the proposals would provide a significant increase and enhancement in office floorspace provision within this location within the CAZ and the Waterloo Opportunity Area, alongside affordable workspace and flexible workspace suitable for SMEs. The proposed office-led mixed use development is supported and the application would comply with London Plan Policies E1, E3, SD1 and SD4. Further clarification is sought on the range of flexible commercial use classes proposed as well as confirmation that evening economy uses would be provided to support the Mayor's objective to promote and diversify the night time economy and the means for securing this.

Urban design

Layout, public realm and landscaping

28. Policies D1-D3 and D8 of the London Plan apply to the design and layout of development and set out a range of urban design principles relating to the quality of public realm. This includes the need to provide convenient, welcoming, legible and pedestrian friendly movement routes and the importance of designing out crime by optimising the permeability of sites and maximising the provision of active frontages and minimising inactive frontages.
29. Currently, the site includes a relatively fragmented arrangement of different buildings and ground floor uses which, collectively, do not positively enhance the quality of the surrounding public realm. The retail frontages along Waterloo Road vary in terms of appearance and quality. Mercury House has a poor interface with Emma Cons Gardens. The current arrangement of fencing, railings and car parking within the public realm restricts east-west permeability in front of the building and creates a relatively cluttered and unwelcoming pedestrian environment
30. The scheme proposes improvements to the elevations of Mercury House at ground floor including the provision of consistently designed commercial frontages facing Waterloo Road and Emma Cons Gardens. Increased floor to ceiling glazing is proposed on the eastern section of the southern elevation to provide enhanced commercial units and improved active frontages. A new accessible ramp entrance would be provided adjacent to these frontages to provide immediate access from Cornwall Road and to better tie the footway levels in with the building openings and floorplan arrangement. The car parking would be removed. Increased glazing and facade improvements are also proposed to the ground floor elevations of Mercury House facing Cornwall Road. These changes are strongly supported and would significantly improve the relationship between Mercury House and the surrounding public realm.
31. Emma Cons Gardens falls outside the planning application boundary and is LB Lambeth owned land. The northern section of Emma Cons Gardens is underutilised and unattractive and in need of modernisation and improvement in terms of landscaping and inclusive access and overlooking. The applicant has also confirmed that it is willing to commit a financial sum towards the improvement of Emma Cons Gardens as part of any S106 agreement. The details of this would need to be brought forwards as part of a separate planning application. A figure of

£1.5 million is mentioned in the DAS in terms of an overall contribution towards public realm improvements surrounding the site. The principle of this approach is strongly supported and should be secured appropriately via the S106 agreement should planning permission be granted.

32. The new office tower would be sited on top of a four-storey podium in order to tie in with the form and massing of Mercury House and the existing streetscape character. The podium would feature a generously sized double height glazed lobby entrance serving the office tower. This would span the entire ground and first floor levels on Waterloo Road. The elevations of the podium would be broken into three different large bays as shown below. The building line of the podium would be staggered backwards to provide additional footway space to pedestrians below a two-storey colonnade. The provision of a small flexible commercial unit in Class E use on Cornwall Road is supported and would help to animate that side of the building.
33. This overall approach is supported and would provide good levels of activation at street level and a legible entrance to the tower. The layout and design approach is supported and accords with the urban design principles and London Plan policies set out above and the guidance set out in the Waterloo Area SPD.

Figure 3 – view along Waterloo Road showing the base of the tower and



Design, massing and architectural and materials approach

34. London Plan Policy D3 requires new development to be of a high quality of architectural design which responds to local character and ensures appropriate detailing and the use of attractive, robust and durable materials.
35. At 74-metres in height and broadly the width of the existing street block, the proposed tower is of a substantial size in terms of its overall form, massing and volume. However, GLA officers consider that the proposed layout, composition,

architectural design and materiality of the building is successful and would ensure the provision of a high quality distinctive new landmark building, alongside the retained and refurbished Mercury House.

36. The tower would have a slightly offset plan form which ensures that the three-dimensional form and elevations of the tower would be angled to face and address important key townscape views. This would be most noticeable at the intersection between Waterloo Road and The Cut as shown below in Figure 4. Similarly, the elevations of the tower are also angled to address views looking west along The Cut from the east of the site and from the Roupell Conservation Area. The provision of inset balconies at the corners which would provide additional depth and visual interest and would also contribute to the sharp-edged appearance of the building. The overall effect of this design approach is to lessen the perceived width and volume of the tower in these townscape views. This design approach is considered to be successful and is supported.

Figure 4 – view of the tower at the junction of Waterloo Road and the Cut



37. The detailing of the main elevations of the tower is well-considered and features a grid framework of horizontal off-white metal bands. Further visual interest and articulation would be provided by the use of dark vertical ribbons running up the elevations. The top of the tower would comprise a roof garden and plant. This has been appropriately screened and visually defined through the use of glazed double height 'crown' which would be articulated through the use of angled green coloured metal frame structure and further horizontal banding in white metal. This would be an attractive feature of the building in townscape views.

38. The tower itself would be visually distinct from the podium through the provision of a set-back fourth and fifth floor and amenity terrace and differentiated materiality and columns on Waterloo Road. This approach allows a degree of breathing space at street level which is welcomed. The height of the podium appropriate set to fit in the existing streetscape character on both sides of Waterloo Road. A strong and contemporary design approach is proposed for the office entrance and podium elevations on Waterloo Road. This would feature dark matt coloured metal and profiled blue/green tiled spandrels and generous bay windows. The detailing and appearance of the podium elevations is supported.
39. In terms of appearance, the greening of both the tower and Mercury House would be a defining and distractive feature of the scheme. The refurbished Mercury House would include vertical green walls as well as planted metal window boxes. Generous planting and trees at roof top and terrace level and corner balconies would also be visible from the street. This would have the effect of softening the appearance of the building and providing seasonal interest.
40. The applicant's landscape statement suggests that drought tolerant plants would be selected with automatic irrigation systems provided. This will need to be very carefully considered and designed to avoid the need for over watering which would be unsustainable and to ensure that planting does not become unsightly or dried out. Appropriate conditions to govern the planting, management and maintenance will need to be secured which would need to cover the buildings lifespan. Comments on the fire safety performance of the proposed green walls are provided below, noting that further detail is required on this issue before the approach can be fully supported. Subject to these matters being addressed, the landscape design strategy for the buildings would be supported.
41. The building integrated solar pv is also further distinctive and innovative feature. The panels provide shading to avoid overheating but would also have a dual role of absorbing solar energy. Matt black panels are proposed which is welcomed given the potential risk of solar glare to the surrounding area. However, conditions should be included to ensure that the scheme does not generate adverse or unacceptable levels of solar glare.
42. In summary, the height, massing and architectural approach is well-considered and would ensure an attractive and visually cohesive addition to the Waterloo opportunity area. The proposal complies with London Plan Policy D3.

Strategic views

43. The site falls within the following designated London View Management Framework (LVMF) strategic views:

Townscape views:

- LVMF View 27 A.1 – Parliament Square: south west
- LVMF View 27 A.2 – Parliament Square; south west

River prospects:

- LVMF View 19A.1: Lambeth Bridge downstream
- LVMF 20B.1: Victoria Embankment: between Waterloo and Hungerford bridges

44. London Plan Policy HC3 states that the Mayor will protect aspects of designated strategic views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site (WHS). This includes identified protected silhouettes. The LVMF SPG sets out the following key principles with respect to the Palace of Westminster WHS which seeks to ensure that development does not adversely impact views of the Palace of Westminster:
- the Palace of Westminster should continue to be clearly seen against clear sky;
 - any development that appears in the interval between the Clock Tower and Portcullis House should not cause adverse harm to the WHS and should not compromise a viewer's ability to appreciate the Outstanding Universal Value (OUV) of the WHS;
 - any development that would be visible between the Clock Tower and the central fleche of the County Hall should be refused; and
 - background development that would appear above the roofline of the Palace of Westminster should be refused.
45. The applicant's TVIA demonstrates that the scheme would not protrude above the roofline of Grade II listed County Hall in LVMF views 27 A.1 and 27 A.2 with the top of the proposed building being aligned in height to the ridge of County Hall and also visually contained behind the Palace of Westminster WHS. The silhouette of the Palace of Westminster would continue to be appreciated against clear sky. There would therefore be no discernible impact on these strategic views and no conflict with the key principles set out in the LVMF SPG.
46. LVMF view 19A.1 located centrally on Lambeth Bridge facing downstream. It provides views of the Palace of Westminster WHS which is located on the northern bank of the Thames. The applicant's TVIA shows that the proposed building would be almost totally hidden behind an existing recently constructed buildings in the background of the view which are on the south bank of the river. The proposed building would not have impact on the Palace of Westminster WHS or other landmark features identified in the LVMF SPG. The impact on LVMF view 19A.1 is therefore acceptable.
47. LVMF view 20B.1 is located next to Cleopatra's Needle on the Victoria Embankment facing south and includes a series of post-war buildings including the Royal Festival Hall and Royal National Theatre. The applicant's TVIA shows that the proposed building would not be visible in this view. In summary, the application would not adversely affect any of the above strategic views and therefore complies with London Plan Policy HC3 and the LVMF SPG.

Heritage

48. London Plan Policy HC1 states that proposals affecting heritage assets and their settings should conserve their significance, avoid harm, and identify enhancement opportunities.
49. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be.

Significance can be harmed or lost through alteration or destruction of the heritage asset or by development within its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

50. London Plan Policy HC2 states that development proposals affecting the setting of World Heritage Sites should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. Development should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes. World Heritage Site Management Plans should be used to inform the plan-making process, and when considering planning applications.
51. GLA officers have reached the following conclusions in respect of the level of harm caused to the significance of nearby designated heritage assets, as set out in Table 2 below. This follows a detailed review of the site and surroundings and consideration of the potential impact of the scheme, taking into account the proposed height, massing and design; the applicant's Townscape and Visual Impact Assessment (TVIA) and Heritage Statement; the significance of the heritage assets in question; and the policy context set out above.

Figure 5 – heritage context

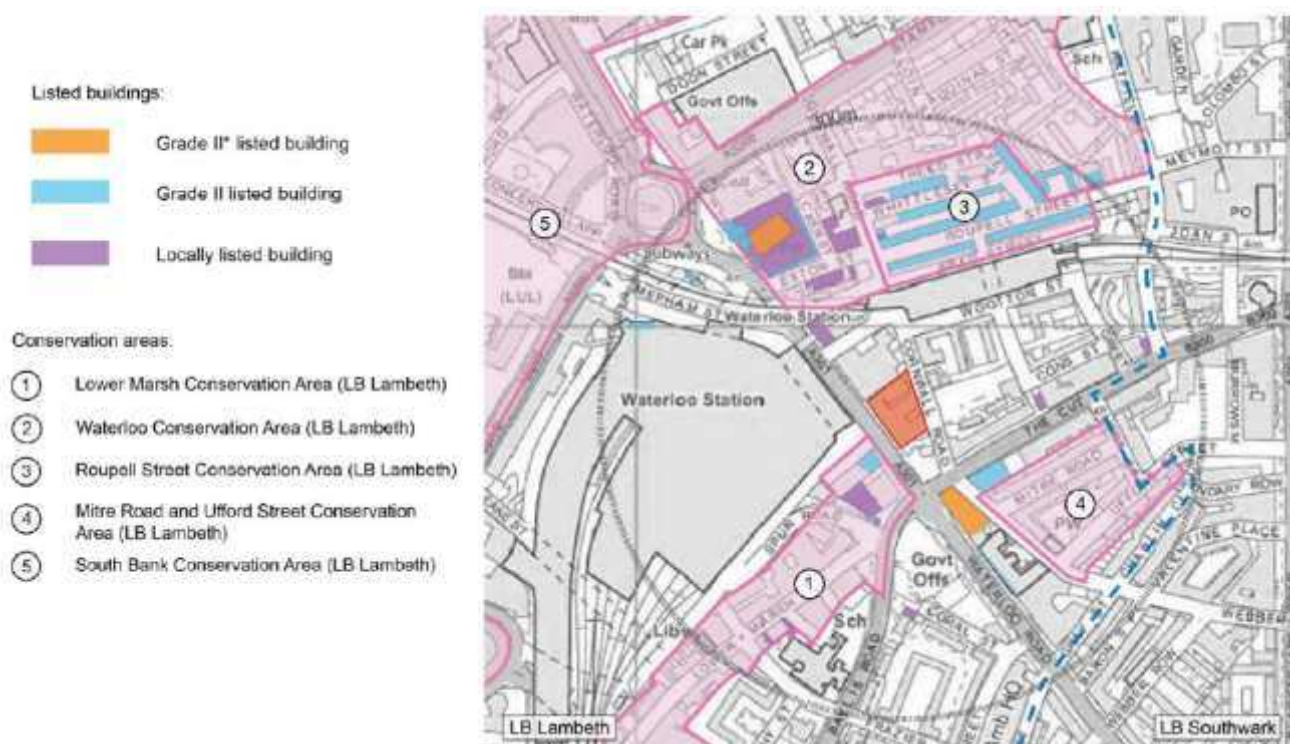


Table 2 – Impact on designated heritage assets

Heritage asset	Level of harm	Scale	TVIA view
Conservation areas			
Roupell Street Conservation Area	Less than substantial harm	Low	Views 7, 8, 9
Waterloo Conservation Area	Less than substantial harm	Low	View 6
Mitre Road and Ufford Street Conservation Area	Less than substantial harm	Low	Views 12, 13
Lower Marsh Conservation Area	Less than substantial harm	Low	Views 14, 16
South Bank Conservation Area	No harm	-	View 3
Parliament Square Conservation Area	No harm	-	Views 4 and 5
World Heritage Site			
Palace of Westminster	No harm	-	Views 4 and 5
Listed buildings			
Grade I listed Houses of Parliament and the Palace of Westminster	No harm	-	Views 4 and 5
Grade I St Margaret's Church	No harm	-	View 5
Grade II* listed Old Vic Theatre	No harm	-	Views 21, 19
Grade II listed Royal National Theatre Studio (83-101 The Cut)	No harm	-	-
Grade II listed former Waterloo Road Fire Station	No harm	-	-
Grade II listed 43-61 Roupell Street; 1-24 Roupell Street; Kings Arms Public House;	Less than substantial harm	Low	Views 7, 8, 9
Grade II listed façade of 133 to 155 Waterloo Road	No harm	-	View 19
Grade II* listed Church of St John with All Saints	No harm	-	View 17
Grade II Waterloo Station (Victory Arch)	No harm	-	N/A
Grade II listed 5 Whichcote Street	No harm	-	N/A
Grade II* Royal National Theatre	No harm	-	View 3

Westminster World Heritage Site

52. As detailed in paragraph 47, the proposed development would not have any discernible impact on the setting or views of the Palace of Westminster World Heritage Site (WHS). The significance and Outstanding Universal Value of the WHS and the ability to appreciate it would not be harmed. The application is in accordance with the requirements of London Plan Policy HC2.

Impact on the setting of listed buildings and conservation areas

53. The impact on the setting of the nearby conservation areas and listed buildings is to some extent limited in this case by the following factors:
- the alignment and orientation of the streets in Roupell Street Conservation Area and the Mitre Road and Ufford Street Conservation Area and the relatively tight and enclosed urban form. This to some extent limits views north and south which means that the building would not be visible from many locations within the conservation area; and
 - the height of the building and its location immediately adjacent to the Capital and Union Jack Club towers. These are slightly taller and have a negative impact on the nearby heritage assets and views. As a result, the proposed tower is shielded by these two towers in views from the north and, where it appears in other views, particularly from the south, it tends to shield these two towers, which are not visually appealing or of any historic or architectural interest.
54. However, the proposed building would be visible from certain identified locations within the Roupell Street Conservation Area with the proposed building visible above the roofline of the Grade II listed terraces and from Cornwall Road. In this context, the building would be seen as immediately adjacent to the Capital and Union Jack Club towers. This would cause less than substantial harm to the significance of the conservation area and Grade II listed buildings which would be at the lower end of the scale.
55. Whilst the development would be in close proximity to the Grade II* listed Old Vic and Grade II listed Fire Station, it would not impact views of the front facades of these buildings due to their orientation towards the site. Buffering would be provided by the refurbished Mercury House. Therefore, GLA officers do not consider the impact on the broader setting would harm the significance of these assets. Furthermore, GLA officers consider that the proposed works to Mercury House would enhance the setting of these heritage assets.
56. The TVIA shows that the building would be noticeable from certain views from the Waterloo Conservation Area, the Mitre Road and Ufford Street Conservation Area and the Lower Marsh Conservation Area. This would alter the setting of these heritage assets as shown in the views set out in the above table. The impacts would be limited to these views which are not the most important views in the conservation area. The level of harm caused to the conservation areas would therefore be at the lower end of the scale of less than substantial harm.

The existing buildings within the site

57. The buildings on site are not locally listed and are not considered to be non-designated heritage assets by GLA officers as they do not exhibit any significance because of their architectural or historic interest. Number 126 Cornwall Road is a yellow stock brick industrial building dating from circa 1925. Number 124 Cornwall Road is a red brick industrial building built during the interwar period. Both buildings are solid but unremarkable examples of small industrial building of the period. However, it is recommended that a scheme to record these buildings prior to their demolition is secured by condition, in line with Historic England guidance.

Conclusion – heritage impact

58. As harm has been identified it must be given considerable importance and weight. Whilst the proposals do not comply with London Plan Policy HC1 which requires development proposals to conserve the significance of heritage assets, GLA officers consider that the development proposals may, on balance, be acceptable in terms of the overall heritage impact.
59. In accordance with the paragraph 202 of the NPPF, the less than substantial harm must be weighed against the public benefits of the proposal, including securing its optimum viable use. In this case, GLA officers consider that the harm could be clearly and convincingly outweighed by the overall public benefits proposed by the application, subject to these being appropriately secured. This is summarised as:
- **Economic benefits** – significant quantitative and qualitative improvement of office floorspace within the CAZ, together with SME and affordable workspace, in line with London Plan policies E1, E3, SD1 and SD4. There would be a substantial increase in jobs on the site with the applicant's employment and skills strategy estimates that the development could support a total of 2,570 jobs (+1,995 net additional jobs).
 - **Regeneration and place-making** – comprehensive office-led mixed use redevelopment of the site incorporating the retention and refurbishment of Mercury House, in line with the aspirations set out in the Waterloo Area SPD. This would provide a new high quality landmark scheme on a key development site within the Waterloo Opportunity Area. The proposed design would enhance the relationship with and activation of Emma Cons Gardens. The applicant has also stated that they would agree to a financial contribution towards enhanced landscaping and public realm improvements within Emma Cons Gardens which is required and would constitute a public benefit, subject to this being agreed and clarified in terms of scope and scale and financial amount.

Tall buildings

60. London Plan Policy D9 seeks to ensure that there is a plan-led and design-led approach to the development of tall buildings across London and that the visual, functional, environmental and cumulative impacts of tall buildings are fully considered and addressed. The architectural and materials quality of tall buildings should be of an exemplary standard. Tall buildings should not adversely affect local or strategic views and should make a positive contribution to the character and legibility of an area.
61. This site falls within a specifically identified location which is appropriate for tall buildings within Lambeth Local Plan (Ref: W6: Waterloo Road / Cornwall Road). The Local Plan sets out general building heights for site as being up to 70 metres AOD with the massing stepping down to the south of the site.
62. The massing of the scheme follows the principles set out above. The height of the scheme is 73.9 metres AOD. This has been set having regard to the LVMF view from Parliament Square. The adjacent Union Jack Club and Capital Towers rise to circa 79 metres.

63. As such, GLA officers consider that the application would accord with the locational and plan-led requirement set out in Part B of Policy D9. Notwithstanding this, an assessment of the scheme against the qualitative criteria set out in Part C of London Plan Policy D9 is still required.

Visual impact

64. The architectural and materials quality of the tower is supported as set out in detail above. GLA officers consider that the tower would make a positive contribution to the character and legibility of the area by providing a distinctive new urban landmark building in a prominent location in the street network close to Waterloo Station and on a key junction where Waterloo Road meets The Cut and Lower Marsh. The proposal would not adversely impact any strategic or local views. Whilst the scheme would cause some harm to designated heritage assets as set out above, this is to some extent limited and the level of harm caused would be less than substantial harm and at the lower end of the scale. The visual impact is considered to be acceptable.

Function impact

65. The layout and design of the base of the scheme is supported and ensures that the tower would float above a four-storey podium linked to Mercury House tying the scheme in successfully with the prevailing streetscape character. A highly legible and welcoming lobby entrance to the office would be located on Waterloo Road and significantly improved active frontages on all sides of the block compared to the existing situation. Deliveries and servicing would take place via Cornwall Road with on-site servicing and turning spaces incorporated at ground floor. Building maintenance facilities have been carefully considered and incorporated in the top of the building and are successfully screened from view. The functional impact of the scheme is acceptable.

Environmental impact

66. Overall, GLA officers consider that the environmental impact of the proposed development is acceptable, taking into account the findings of the applicant's daylight and sunlight report and noting the site location and the existing and emerging surrounding context and land uses.
67. In terms of the daylight and sunlight impact, there are no residential properties directly to the north. Furthermore, there is a bus station to the east and Waterloo Station to the west. The potential for daylight and sunlight impacts is therefore primarily an issue likely to affect certain properties within the OCCC estate to the north east. The applicant has made changes to the scheme to introduce an 8-metre set back on the northern facade of the tower to address concerns in terms of the impact on the existing and proposed residential properties within the OCCC estate.
68. Overall, whilst there would be some impacts identified in the applicant's daylight and sunlight study, this is considered to be acceptable in this particular context noting the site's location and the scale of change anticipated and noting that the site is considered to be suitable in principle for tall buildings and located adjacent to a major transport hub within the Waterloo Opportunity Area.

69. Wind impacts have been considered and tested as part of the applicant's Wind Microclimate Assessment and is based on the industry standard comfort and safety criteria. The assessment has demonstrated that wind conditions in the streets immediately surrounding the proposed development and in Emma Cons Gardens would be acceptable and suitable for pedestrians and cyclists. Therefore, no specific mitigation is proposed. The environmental impact is considered to be acceptable.

Cumulative impact

70. GLA officers have considered the potential for cumulative impacts noting the site circumstances and the existing and emerging planning context. This is considered to be acceptable and does not raise any strategic planning concerns.

Public access

71. London Plan Policy D9 states that free to enter publicly accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings. These should normally be located at the top of the building to afford wider views across London. The building is 74-metres in height and would include a roof top level terrace and bar serving the office. The flexibility to enable community access to this space during weekend days / evenings would therefore be encouraged.

Fire safety

72. A fire statement has been prepared by a third party suitably qualified assessor and submitted as required by London Plan Policy D12. This covers a range of fire safety related matters including: building materials and construction; measures to prevent fire spread in terms of external walls; means of escape and evacuation; fire safety systems (including suppression, detection and alarm systems) and smoke control measures; and fire brigade access and facilities. Sprinkler protection is proposed throughout the building. Wheelchair evacuation lifts are proposed.
73. The fire statement states that the design and management of the green walls on Mercury House will be in line with Government guidance and the Building Regulations requirements to prevent fire spread. However, the level of detail provided is limited and should be subject to further discussion and clarification. It should be noted that the Mayor's draft fire safety LPG states that development should not incorporate combustible materials in its external walls. Building regulations on fire safety also states that the external walls of buildings should resist fire spread.
74. The proposed green walls and solar panels are understood to be combustible and therefore further discussion is required on this issue before the proposed approach can be supported. Given the south facing nature of the proposed green wall, GLA officers would recommend that the irrigation system serving the green wall is linked to fire detection, alarm and suppression measures and sprinkler systems. Once approved, compliance with the final fire statement should be secured by condition in any planning approval.

Inclusive access

75. Policy D5 of the London Plan requires that all new development achieves the highest standards of accessibility and inclusive design. The proposed development will ensure inclusive step free access is provided for both buildings. Changes are proposed to Mercury House to raise the adjacent public highway levels and ensure a more continuous alignment between the public realm and building openings. Whilst this would result in stepped routes, a lift is proposed from street level to gain step free access from Cornwall Road, with step free access available from Waterloo Road. This is acceptable. Conditions are required to ensure that detailed elements of the proposed scheme accord with the inclusive design principles set out in the above policies.

Transport

Healthy Streets

76. The development will benefit from several planned schemes delivering enhancements to walking and cycling routes supporting the Mayor's Healthy Streets agenda. This includes planned improvements at the Waterloo (Imax) roundabout and the measures on Waterloo Road implemented temporarily as part of the London Streetspace Programme that could be made permanent. To support the expected uplift in walking and cycling trips generated by the development an appropriate contribution towards active travel enhancements should be agreed with TfL and Lambeth Council and secured in the S106 agreement.
77. Existing cycle hire docking stations in the vicinity of the site are some of the most well used. Given the scale and type of development proposed a contribution of £220,000 towards additional capacity should be secured. The applicant should also commit to providing cycle hire memberships for future staff to support active travel.

Cycle parking

78. A total of 489 cycle parking spaces are proposed to be provided at first and ground floor levels of the tower building. This will be shared with future occupants of Mercury House where no cycle parking is proposed. Based on the total floorspace the amount of cycle parking should be increased by 25 spaces for compliance with the London Plan Policy T5. An increase in the number of Sheffield stands able to accommodate larger or adapted cycles (at least 5%) is required to meet the London Cycling Design Standards (LCDS). No more than 10% of the proposed cycle parking should comprise foldable cycle lockers.

Car parking

79. Two disabled persons' car parking spaces are proposed which accords with the London Plan. These will be provided as a car stacker in the on-site servicing area accessed from Cornwall Road and will be managed by a site valet. Both spaces should be equipped with electric vehicle charging infrastructure.

Transport impact

80. Census data is applied to the total person trip generation to establish the mode of travel for the proposed office use. This should be updated to reflect current trends and local characteristics. For instance, a 2.9% mode share for cycling is low for this location and should be increased in line with other recent developments and the Mayor's Transport Strategy. The subsequent net trip generation by mode should be updated accordingly.
81. Over 1,000 pedestrian trips are expected to be generated by the development in the morning and evening peak hours. The main building entrances are proposed from Waterloo Road hence the applicant has reviewed TfL's Pedestrian Comfort Level Guidance for this section of the footway. Recent pedestrian count data should be obtained to inform this assessment, and a review of pedestrian flows and crossing activity should be completed to demonstrate that there is sufficient capacity for the volume of pedestrian trips on footways and at crossing points. Further discussion with TfL and Lambeth Council is required to confirm the scope of this assessment.
82. Baseline data from 2020 has been used to assess the development impact on the relevant London Underground services and stations. Since this data is not representative, and to account for anticipated growth in the area, the applicant should obtain outputs from TfL's strategic public transport models to ascertain the cumulative impact of the development.
83. A contribution towards the delivery of a platform lift to the Northern line at Waterloo station should be secured from this development. It is expected that most LU trips (including those connecting with other rail services) would be made from Waterloo, of which a higher proportion would require Northern line routes. The details of this contribution should be discussed further with TfL.

Deliveries, Servicing and Construction

84. A dedicated loading area is proposed which will enable most servicing activity to be carried out on-site. The loading area will be accessed from Cornwall Road. Where vehicles are waiting to enter the site, this is likely to impact upon the safety and amenity of Cycleway 10, and the adjacent access to Waterloo bus garage. A detailed Delivery and Servicing Plan (DSP) should be secured by condition and should include a commitment to reducing the number of servicing trips through consolidation and the use of cargo bikes.
85. Details of the construction arrangements should be discussed further with TfL. It is understood that access is proposed from Waterloo Road, requiring a pit lane and relocation of the existing bus stop. This will have a significant impact to pedestrians, cyclists, and bus passengers throughout the construction programme. A detailed Construction Logistics Plan (CLP) should be secured by condition.

Sustainable development

Energy strategy

86. In terms of the new build element (Waterloo Central) the development is estimated to achieve a 49% reduction in CO2 emissions compared to 2013 Building Regulations. Whilst this meets the minimum 35% London Plan requirement for CO2 reductions on site, it falls short of meeting the net zero-carbon target in London Plan Policy SI2. As such, a carbon offset payment should be secured to mitigate the shortfall in meeting the zero carbon target.

Be lean

87. A range of passive design and energy efficiency measures are proposed. This includes optimised glazing ratios and high performance glazing, as well as shading panels and deep window reveals and balcony set backs on the exposed south facing corners of the building. Solar gain would also be controlled through motorised internal blinds which would be deployed automatically according to the sun position and solar and daylight conditions. This overall approach is supported.
88. The new build element of the scheme is expected to achieve 15% reductions through energy efficiency and passive design measures. This meets the minimum requirements set out in London Plan Policy SI2.
89. The energy efficiency improvement measures proposed for Mercury House comprise replacement windows, façade improvements and heat pump systems. This would achieve a 38% reduction in CO2 emissions which is supported.

Be clean

90. The applicant has identified the proposed SBEG district heating network within the vicinity of the development but is not proposing to connect to the network. Connection to the network should be prioritised in line with the heating hierarchy set out in London Plan Policy SI3. The applicant has explored the potential to export waste heat from the office tower to other nearby buildings and developments. This would be supported and the applicant is encouraged to further progress these discussions and associated technical work. Future proofing the scheme to enable both connection to the DHN and heat export should be secured.

Be green

91. The applicant is proposing Building Integrated Solar Photovoltaics (BIPV) for the development integrated on the facade of the tower. These will also provide solar shading. The energy statement estimates that the BIPV technology would reduce the building's regulated emissions by 11% compared to the proposed development without PV (7% reduction compared to the 2013 Part L baseline). From an energy perspective, this is supported.
92. The scheme is not proposing any roof top level solar panels due to the roof level constraints and noting the overall solar provision proposed which is integrated into the building facades. The constraints which prohibit further solar pv provision at roof top level in this instance are plant, the building management unit storage

(including window cleaning cradle), as well as the 19th floor roof terrace serving the office. GLA officers are therefore satisfied that the solar pv provision has been maximised.

93. Heat pumps are proposed in the form of a centralised Air Source Heat Pump (ASHP) system which would contribute a further CO2 reduction of 28%. The applicant has also outlined a further potential option being considered which would involve a Ground Source Heat Pumps (GSHP) system also being provided to supplement the ASHP system.
94. The carbon shortfall in tonnes CO2 and the associated carbon offset payment that will be made to the borough should be confirmed. This should be calculated based on a net-zero carbon target for domestic and non-domestic proposals using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price.
95. To meet the net zero target, the applicant is intending to fund the creation of new renewable power generation by entering into a Power Purchase Agreement with a renewable energy partner. There are concerns regarding this approach in terms of timescales, additionality, location which need to be resolved, as set out in more detail in the GLA energy team's technical advice note.

Whole Life-cycle Carbon

96. The retention and refurbishment of Mercury House results in the retention of the existing structure, basement, foundations and other solid elements of the building enveloped. This minimises embodied carbon associated with this element of the proposed development which is strongly supported.
97. The applicant has submitted a whole life-cycle carbon assessment in line with London Plan Policy SI2. This assesses the embodied and operational carbon associated with the proposed development. It identifies the key building elements with the highest embodied carbon and recommends measures to reduce these carbon emissions in terms of the superstructure, substructure, external facade, internal finishes and building services which are then compared to GLA benchmarks. Overall, the identified carbon savings could reduce the embodied and operational carbon emissions by approximately 34% which will be further reviewed at RIBA Stage 3 when the specification is finalised and on completion.
98. The WLC assessment is acceptable and in line with the GLA's guidance. The application complies with London Plan Policy SI2. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](#).

Circular Economy

99. A circular economy statement has been submitted in line with London Plan Policy SI7. This is acceptable and in line with the GLA's Circular Economy LPG. This details how circular economy principles would be incorporated in the proposed scheme in terms of the use and specification and sourcing of materials; designing out waste in the demolition, construction and operation of the proposed

development; and embedding key principles such as reusability, longevity, adaptability and flexibility.

100. The applicant has stated that it is not viable to retain the buildings within the Waterloo Central part of the site in place of which the tower would be constructed. This is acceptable given the existing circumstances and range of planning considerations set out in this report. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA [website](#).

Environmental issues

Urban greening

101. London Plan Policy G5 requires new development to contribute towards urban greening. Whilst the opportunities for urban greening on the site are to some extent limited, the applicant has maximised the potential for planting and urban greening at various levels within the scheme which is strongly supported. Measures include intensive green roof areas and tree planting within balconies and roof terrace areas, as well as green walls. The landscape strategy states that trees would be planted in raised planters of 1.2 to 1 metre in size as a minimum with tree species selected appropriately. Underplanting with flower rich perennial, shrub and grass borders is also proposed to create groundcover. Evergreen planting is proposed on the green walls to create a year-round impact with an automatic irrigation system proposed and ongoing monitoring and maintenance. Drought tolerant species will need to be appropriately selected on the south facing facades.
102. The applicant has undertaken an Urban Greening Factor (UGF) Assessment and this confirms that the scheme would achieve a 0.36 UGF score. This complies with the London Plan Policy G5 and meets the recommended UGF benchmark target for a commercial site such as this. This is supported.

Sustainable drainage and flood risk

103. The site is located within Flood Zone 3a in an area which benefits from well-maintained flood defences along the River Thames. The scheme proposes to reduce peak surface water discharge rate to a greenfield rate of run-off. The drainage strategy comprises a combination of blue roof systems at various levels to achieve the required rain water attenuation capacity of 140 cubic metres. The applicant's flood risk assessment and drainage strategy are in line with the London Plan.

Air quality

104. The site is located within the Lambeth Air Quality Management Area where monitoring of existing nitrogen dioxide levels exceed the objective levels due to its busy road site location on Waterloo Road. The applicant has undertaken an air quality neutral assessment which shows that the proposals scheme is not expected to have a significant worsening impact on air quality, taking into account the likely emissions associated with the proposed land uses in terms of trip

generation, servicing and deliveries and operational energy mechanisms. The scheme is car-free and the energy strategy is reliant on renewable energy technologies in the form of built-in solar pv panels and air source heat pumps. The office would be a fully sealed and mechanically ventilated building with air intakes at the top of the building fitted with NOx filters. This would ensure that impacts on human health are appropriately controlled and avoided. The application therefore accords with London Plan Policy S11.

Local planning authority's position

105. Lambeth Council planning officers are currently assessing the application and a planning committee timescale has not yet been confirmed.

Legal considerations

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

Financial considerations

107. There are no financial considerations at this stage.

Conclusion

108. London Plan policies on the CAZ, opportunity areas, offices, affordable workspace, town centres, the night time economy, urban design, tall buildings, heritage, world heritage sites, strategic views, inclusive design, fire safety, transport, climate change, energy, urban greening, drainage and air quality are relevant to this application. Whilst the proposal is supported in principle, the application does not yet fully comply with these policies, as summarised below:
- **Land use principles:** The scheme would provide a significant increase and enhancement in office floorspace provision within this location within the CAZ and the Waterloo Opportunity Area together with affordable workspace and SME co-workspace. This is strongly supported. Further clarification is sought on the range of flexible commercial use classes proposed as well as confirmation that evening economy uses would be provided to support the Mayor's objective to promote and diversify the night time economy.

- **Urban design and heritage:** The layout, design, architectural and materials quality of the scheme is supported. The location is identified as suitable for tall buildings and the visual, function, environmental and cumulative impact could be, on balance, acceptable, subject to conditions. The proposal would not harm any LVMF strategic views or impact the Palace of Westminster World Heritage Site. A low level of less than substantial harm would be caused to nearby designated heritage assets which could be outweighed by public benefits, subject to these being secured. Further detail and clarification is required on the green walls and building integrated solar panels in terms of fire safety, irrigation, maintenance and solar glare.
- **Transport:** Further assessment of the development impact to pedestrian routes and public transport services is required, along with contributions to active travel enhancements, Cycle Hire and Waterloo station.
- **Climate change and environmental issues:** The energy and urban greening strategies are supported, subject to further information and discussion on some of the technical details relating to district heating and mechanism for securing carbon offset payments.

For further information, contact GLA Planning Unit (Development Management Team):

[REDACTED]
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We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.



Borough ref: 22/02489/FUL

TfL ref: LMBT/22/181

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Sent by email

13 October 2022

Dear ██████████

Waterloo Central and Mercury House, Lambeth – TfL's Comments

I write following notification of the above planning application (reference 22/02489/FUL) to provide detailed strategic transport comments. These provide more detail on the matters raised in the GLA Stage 1 Planning Report (GLA/2022/0645/S1/01) dated 7 October 2022. Please note that these are additional to any response you may have received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest.

Site context

The site is situated between the A301 Waterloo Road to the west and Cornwall Road to the east. The A301 Waterloo Road forms part of the Strategic Road Network (SRN), for which TfL has duties under the Traffic Management Act 2004. Cornwall Road comprises part of Cycleway 10.

The eastern entrance to Waterloo station is opposite the site on Waterloo Road, where access to National Rail and London Underground services (Bakerloo, Jubilee, Northern and Waterloo & City lines) can be achieved. Waterloo East National Rail station is also within 100m of the site. Bus services can be accessed from stops immediately adjacent to the site on Waterloo Road. The site neighbours Waterloo Bus Garage to the east, accessed via Cornwall Road. The site has a Public Transport Access Level (PTAL) of 6b, on a scale of 0 to 6b, where 6b represents the greatest level of access to public transport services.

TfL is working with the London Borough of Lambeth, Network Rail, and other stakeholders on a strategic masterplan for Waterloo station, immediate environment and surrounding area of Waterloo and the South Bank. The project is at a very early stage but will consider opportunities for development and connections through the area.

Healthy Streets / Active Travel Zone

The development will benefit from several planned schemes delivering enhancements to walking and cycling routes, supporting the Mayor's Healthy Streets agenda. This includes planned improvements at the Waterloo (IMAX) roundabout to greatly improve the pedestrian environment and legibility, and support regeneration in this area. Whilst

MAYOR OF LONDON

this transformational scheme is currently paused, TfL will be progressing complimentary enhancements including road safety improvements at the Waterloo IMAX junction with Stamford Street as part of TfL's Safer Junctions programme. Temporary enhancements on Waterloo Road have been installed as part of the London Streetspace Programme, and TfL is also working with Lambeth Council to make these permanent.

The proposed development is expected to significantly increase peak hour pedestrian and cycle movements on the highway network. Table 8.2 of the Transport Assessment (TA) indicates an uplift by 508 pedestrians in the morning peak and 324 in the afternoon peak, totalling over 1,000 pedestrians in each peak hour associated with the development. The main pedestrian entrances are proposed from Waterloo Road, which will see the greatest amount of pedestrian activity and is a key route identified in the Active Travel Zone (ATZ) assessment. There is a signal pedestrian crossing on Waterloo Road, approximately 60m from the site, which will also likely see a significant increase in use connecting the site with Waterloo station.

Pedestrian count data is set out in table 4.2 of the TA, based on work undertaken by Space Syntax in March 2018. This has been used to demonstrate that the existing footways allow a comfortable width for the anticipated pedestrian activity, based on TfL's Pedestrian Comfort Level Guidance. However, these surveys are dated, and the assessment does not consider cumulative growth generated by development in the area. New pedestrian counts should be undertaken to inform this assessment, including a review of existing and future pedestrian desire lines, and crossing activity on Waterloo Road. The applicant is recommended to engage further with TfL and Lambeth Council to agree the scope of this assessment.

Given the cumulative uplift in pedestrian and cycle movements in the local area, an appropriate contribution towards active travel / Healthy Streets enhancements should also be agreed with TfL and Lambeth Council and secured in the s106 agreement.

Plans shown at Appendix G of the TA set out the extent of proposed highway works included with the application to be undertaken on Cornwall Road and Waterloo Road. It is not clear what the footway works entail, however these should be coordinated within any future plans for this section of the highway with Lambeth Council and TfL. It is expected that these works will be delivered via s278.

Existing Cycle Hire docking stations in the vicinity of the site are some of the most well used. Given the scale and type of development proposed a contribution of £220,000 towards additional capacity should be secured. The applicant should also commit to providing Cycle Hire memberships for future staff to support active travel.

Cycle parking

A total of 489 cycle parking spaces are proposed to be provided at first and ground floor levels of the tower building. This will be shared with future occupants of Mercury House where no cycle parking is proposed. Based on the total development proposed the amount of cycle parking should be increased by 25 spaces (to a total of 514 spaces) for compliance with the London Plan policy T5.

Cycle access to the development will largely be from Cornwall Road, providing a direct link to Cycleway 10, which is welcomed. Alternative access will also be achieved from Waterloo Road.

Full details of the cycle parking dimensions should be confirmed prior to determination of the application, demonstrating that the cycle parking will be laid out according to the London Cycling Design Standards (LCDS). Accordingly, the proportion of Sheffield stands able to accommodate larger or adapted cycles must be increased to at least 5%, whilst no more than 10% should comprise foldable cycle lockers. Long and short stay cycle parking will not be separated therefore the applicant must confirm that access to the cycle parking will be convenient and readily accessible to visitors. If not, a contribution to provide off-site visitor cycle parking may be required.

Car parking

Two disabled persons' car parking spaces are proposed, which accords with the London Plan. These will be provided as a car stacker in the on-site servicing area accessed from Cornwall Road and will be managed by a site valet. Both spaces should be equipped with electric vehicle charging infrastructure which should be secured by condition.

Trip generation and impact assessment

Census data is applied to the total person trip generation to establish the mode of travel for the proposed office use. This should be updated to reflect current trends and local characteristics. For instance, a 2.9% mode share for cycling is low for this location and should be increased in line with other recent developments and the Mayor's Transport Strategy. TfL data for the local highway network in the vicinity of the site indicates that cyclists make up a significant composition of traffic movements at peak times, suggesting there is a high commuter cycle mode share for this area. The subsequent net trip generation by mode should be updated accordingly.

Baseline data from 2020 has been used to assess the development impact on LU services and stations. Due to the effect of the pandemic, this data is not considered representative and the assessment in the TA therefore fails to consider the total cumulative demand. Given the location and complexity of the network, TfL recommends extracting data from its strategic transport models (Railplan), which can be obtained from strategicmodelling@tfl.gov.uk based on the following approach:

1. Obtain forecast LUL line loadings for lines considered to be impacted (as listed in table 8.10 of the TA)
2. Obtain forecast station interchange matrices for impacted stations
3. Manually add development trips onto future forecast flows using professional judgement/information on distribution of development trips.
4. Assess impact on lines and stations as before.

A contribution towards the delivery of a platform lift to the Northern line at Waterloo station should be secured from this development. It is expected that most LU trips (including those connecting with other rail services) would be made from Waterloo, of which a higher proportion would require Northern line routes. The details of this contribution should be discussed further with TfL.

Deliveries and servicing

A dedicated loading area is proposed which will enable most servicing activity to be carried out on-site. The loading area will be accessed from Cornwall Road and will provide three delivery bays. The TA suggests that without consolidation the development could attract 94 deliveries per day, however it is noted that the potential for consolidation with commercial deliveries could reduce this demand by half. On this basis it is confirmed that the service yard could accommodate up to 12 vehicles per hour. However, in the unconsolidated scenario the demand could be up to 22 vehicles in a single hour which would lead to vehicles waiting on Cornwall Road. This would

impact the safety and amenity of Cycleway 10 and access to Waterloo bus garage, which is unacceptable.

A commitment to reducing deliveries by 50% through consolidation should therefore be secured and monitored through the Delivery and Servicing Plan (DSP) and associated conditions. The provision of electric vehicle charging facilities is also welcomed, and further investigation into the use of cycle freight should be included within SMART targets set out in the detailed DSP.

Construction

Further discussion with TfL is required to agree the details of the proposed construction arrangements. It is understood that the current proposals suggest access for construction and a pit lane from Waterloo Road is expected, which will require the existing bus stop to be relocated. This will significantly impact pedestrians, cyclists, and bus passengers throughout the construction programme. The outline approach to construction access and any necessary mitigation should be agreed with TfL prior to determination, and a detailed Construction Logistics Plan (CLP) secured by condition.

Other matters

A travel plan should be secured by way of condition/s106 agreement and should include robust measures to influence mode share and minimise vehicle movements, for example Cycle Hire business membership accounts and restrictions on personal deliveries at work.

In accordance with the London Plan, the development will be liable for a Mayoral CIL contribution. From 1st April 2019 the rate for development in Lambeth is £60 per square metre of net floor area. TfL and the Council needs to be satisfied that adequate transport mitigation has been agreed to support the application. Any mitigation over and above CIL would need to be secured by condition or s106 and s278 agreements.

Summary

In summary, the proposals do not comply with the strategic transport policies, and the following items should be addressed prior to determination:

1. Pedestrian surveys conducted to inform assessment of pedestrian desire lines and crossing activity
2. Active travel / Healthy Streets contribution to be agreed with TfL/Lambeth Council and secured
3. A contribution of £220,000 secured towards TfL's Cycle Hire scheme
4. Cycle parking should be increased by 25 spaces and detailed provided confirming compliance with the London Cycling Design Standards
5. Disabled persons' car parking and electric vehicle charging secured by condition
6. The mode split and trip generation revised and further assessment of LU lines and stations based on data from TfL's strategic models
7. Delivery and Servicing Plan secured by condition including a 50% consolidation commitment
8. Further discussion with TfL to agree construction methodology and detailed Construction Logistics Plan secured by condition.

I trust that the above provides you with a better understanding of TfL's current position on the application. Please do not hesitate to contact me if you have any questions or need clarification on any of the points raised.

Yours sincerely,

[REDACTED]

Principal Technical Planner

Email [REDACTED]

Direct line [REDACTED]



Historic England

[REDACTED]
London Borough of Lambeth
Lambeth Town Hall
Brixton Hill
Brixton
SW2 1RW

Your Ref: 22/02489/FUL
Our Ref: 209523
LAG/022/0639-02
Contact: [REDACTED]

2022-09-14

Dear [REDACTED]

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2021**

99-101, 103/107, 117 and 109-119 Waterloo Road and 124-126 Cornwall Road, SE1 8UL

Demolition of 99-101 Waterloo Road, 103-107 Waterloo Road, 124 and 126 Cornwall Road and redevelopment for a new office building (Class E g) and flexible ancillary uses (Class E a, b) together with the refurbishment of 109-119 Waterloo Road (Mercury House) for Class E a, b, and g uses, and works to the public highway, public realm, new landscaping, ancillary and enabling works, plant and equipment.

Recommend Archaeological Condition(s)

Thank you for your consultation dated 2022-08-23.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

Assessment of Significance and Impact

The planning application is not in an area of archaeological interest.

Excavation undertaken in 1990 within the central area of the current application site produced archaeological material indicating a Bronze Age ditch and possible timber trackway, as well as medieval drainage/property boundary ditch. While the potential for a trackway would mean that the site would have regional, if not national, significance, the subsequent scale of development across this site means that the on-going archaeological interest can be secured by condition.



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

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Correspondence or information which you send us may therefore become publicly available.



Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 205 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendation

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

I therefore recommend attaching a condition as follows:

- Condition No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works. If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:
- The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- A. Where appropriate, details of a programme for delivering related positive public benefits
- B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be



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discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informative Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition, please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 205.

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

First element of the evaluation stage would be the supplementing of any geotechnical data for the site in the form of a geoarchaeological survey. The resultant report will inform as to whether a trial trench element is appropriate and if so, the areas within the site that should be targeted.

Mitigation

The report of the evaluation stage will inform as to whether a mitigation stage is required and what form would be appropriate and proportionate.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

[Redacted Signature]

Archaeology Advisor
Greater London Archaeological Advisory Service
London and South East Region



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

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██████████
London Borough of Lambeth
Development Control
Phoenix House (10) Wandsworth Road
London
SW8 2LL

Our ref: SL/2022/122213/01-L01
Your ref: 22/02489/FUL
Date: 6 September 2022

Dear ██████████

Demolition of 99-101 Waterloo Road, 103-107 Waterloo Road, 124 and 126 Cornwall Road and redevelopment for a new office building (Class E, G) and flexible ancillary uses (Class E, A, B) together with the refurbishment of 109-119 Waterloo Road (Mercury House) for Class E, A, B, and G uses, and works to the public highway, public realm, new landscaping, ancillary and enabling works, plant and equipment

**99-101, 103/107, 117 and 109-119 Waterloo Road and 124-126 Cornwall Road
London, SE1 8UL**

Thank you for consulting us on this application.

The Environment Agency has **no objection** to the proposed development as submitted.

Flood risk

The site is in Flood Zone 3 and is located within an area benefitting from flood defences. Whilst the site is protected by the River Thames tidal flood defences up to a 1 in 1000 (0.1%) chance in any year, our most recent flood modelling December 2017 shows that the site is at risk if there were to be a breach in the defences.

The submitted Flood Risk Assessment (FRA) (December 2021; AKT II) provides an accurate assessment of the tidal and fluvial flood risks associated with the proposed development.

Please note that our review is based solely on submitted documentation and reported actions, so no responsibility can be taken for the accuracy of any such information.

The Local Planning Authority should consider the submitted FRA when deciding this application in accordance with Paragraph 167 of the [National Planning Policy Framework](#) (NPPF).

Flood resistance and resilience

We recommend that flood resistant and resilient measures are incorporated in to the design and construction of the development proposals, where practical considerations allow, using guidance contained within the Department for Communities & Local Government (DCLG) document [‘Improving the flood performance of new buildings: flood resilient construction’](#).

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated

Should you have any queries regarding this response, please contact me.

Yours sincerely,

I

[Redacted signature]

Sustainable Places Planning Advisor

E-mail [Redacted email address]

[REDACTED]

From: [REDACTED]
Sent: 21 September 2022 10:55
To: [REDACTED]
Subject: FW: Network Rail Consultation Response: 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL

Dear [REDACTED]

Please see below e-mail that requires your attention.

Kind regards

[REDACTED]
Customer Services Officer
**Residents Experience & Digital
Resident Services**
02079261000
[REDACTED]
www.lambeth.gov.uk

From: [REDACTED]
Sent: 21 September 2022 10:26
To: Planning <XHREPlanning@lambeth.gov.uk>
Subject: Network Rail Consultation Response: 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL

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OFFICIAL

Dear Planning,

Network Rail Consultation Response: 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL

Thank you for consulting Network Rail on the above planning application.

Following a review of the application, I can confirm that Network Rail have no objections to the proposal.

Kind regards,



[REDACTED]
Technical Surveyor
Network Rail Property (Southern)
Office Address: 1 Puddle Dock, London, EC4V 3DS
Email: [REDACTED]
Mobile: [REDACTED]

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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN.

[REDACTED]

From: [REDACTED] (Capita External Contractor) on behalf of Planning
Sent: 23 August 2022 15:54
To: Rozina Vrlic
Subject: FW: 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL (Our Ref pgo-1825)

Dear Rozina,

Please see below e-mail that requires your attention.

Kind regards

[REDACTED]
Customer Services Officer
Residents Experience & Digital
Resident Services

[REDACTED]
www.lambeth.gov.uk

From: PlanningGatewayOne <PlanningGatewayOne@hse.gov.uk>
Sent: 23 August 2022 14:07
To: Planning <XHREPlanning@lambeth.gov.uk>
Subject: RE: 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL (Our Ref pgo-1825)

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Good afternoon,

Thank you for your email in relation to 22/02489/FUL

HSE is the statutory consultee for planning applications that involve or may involve a relevant building.

Relevant building is defined as:

- contains two or more dwellings or educational accommodation and
- meets the height condition of 18m or more in height, or 7 or more storeys

“Dwellings” includes flats, and “educational accommodation” means residential accommodation for the use of students boarding at a boarding school or in later stages of education (for definitions see article 9A(9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order.

However, from the information you have provided for this planning application it does not appear to fall under the remit of planning gateway one because the purpose of a relevant building is not met.

Please also note for future reference a 'fire strategy statement' is different to a 'fire statement' which should be provided by the developer as part of their planning application. Further guidance on fire statements is available on [GOV.UK](https://www.gov.uk).

Once again thank you for your email, if you require further advice, please do not hesitate to contact the planning gateway one team.

Kind Regards



**Operational Support,
Building Safety and Construction Division**

Health And Safety Executive, Redgrave Court, Merton Road, Bootle, Merseyside, Liverpool, L20 7HS

☎: ✉: PlanningGatewayOne@hse.gov.uk

-----Original Message-----

From: lambethplanning@Lambeth.gov.uk <lambethplanning@Lambeth.gov.uk>

Sent: 23 August 2022 12:33

To: PlanningGatewayOne <PlanningGatewayOne@hse.gov.uk>

Subject: 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL

Please See Attached

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<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.lambeth.gov.uk%2Femail-disclaimer&data=05%7C01%7CPlanningGatewayOne%40hse.gov.uk%7Ceef024cd0de04d043fb308da84fb9b22%7C6b5953be6b1d4980b26b56ed8b0bf3dc%7C0%7C0%7C637968513432723215%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=M6tkFdLodnAniEQqN4Q6vycV6nWQ%2FkoHzi5yKZm9zp4%3D&reserved=0>

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[REDACTED]

From:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Waterloo Road
And 124-126 Cornwall Road London SE1 8UL [SG33911]

From: [REDACTED] **On Behalf Of** Planning

Sent: 24 August 2022 07:34

To: [REDACTED]

Subject: FW: [EXTERNAL] 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL [SG33911]

Good Morning,

Please see email below which requires your attention.

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]

Sent: 23 August 2022 15:47

To: [REDACTED]

Subject: RE: [EXTERNAL] 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL [SG33911]

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Our Ref: SG33911

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of

this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS

NATS Safeguarding

[Redacted signature]

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Public

From: lambethplanning@Lambeth.gov.uk <lambethplanning@Lambeth.gov.uk>

Sent: 23 August 2022 12:34

To: NATS Safeguarding <NATSSafeguarding@nats.co.uk>

Subject: [EXTERNAL] 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL

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NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

From: [REDACTED]
Sent: 25 August 2022 11:23
To: [REDACTED]
Subject: SE5435 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL

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Dear [REDACTED]
Thank you for your email dated: **23rd August 2022**
Regarding: **99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL**
Planning Reference Number: **22/02489/FUL**
Text: ***Demolition of 99-101 Waterloo Road, 103-107 Waterloo Road, 124 and 126 Cornwall Road and redevelopment for a new office building (Class E g) and flexible ancillary uses (Class E a, b) together with the refurbishment of 109-119 Waterloo Road (Mercury House) for Class E a, b, and g uses, and works to the public highway, public realm, new landscaping, ancillary and enabling works, plant and equipment.***

This has been logged on the SBD files under SE5435.

I see no reason why this development should not easily achieve Secured by Design standards, according to the SBD Commercial Guide.
Each aspect of the proposed development can be phased and otherwise separated out to achieve separate certification as appropriate, with a single overarching certificate being issued on completion of all works.

Should Planning permission be granted for this development, I would advise that Pre-Commencement and Pre-Occupation conditions are considered to ensure end-to-end compliance with Secured by Design and are worded;

1. SBD Measures.

The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific Security needs of the development in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the local planning authority prior to commencement of the development and shall be implemented in accordance with the approved details prior to occupation.

2. Secured by Design Certification.

Prior to occupation, a satisfactory Secured by Design inspection must take place. The resulting Secured by Design certificate shall be submitted to and approved by the local planning authority.

Informative:

The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available **free of charge** and can be contacted via docomailbox.SE@met.police.uk

Where planning conditions to achieve SBD certification exist, we will be on hand to assist all parties involved from concept to completion.

Planning Conditions to achieve Secured by Design certification will invariably afford you comfort in the knowledge that all aspects of physical Security within any particular development have been considered and approved. Where Secured by design Certification is required to discharge Pre-Occupation Planning Conditions, a physical site inspection will always be carried out by a qualified Designing out Crime Officer (DOCO) upon completion.

Sometimes local crime trends and geographical location insist that heightened security measures are necessary to achieve SBD, and this is decided upon development, by development.

This advice is in line with The National Planning Policy Framework (NPPF) (July 2021):

8.

Promoting healthy and safe communities:

92.

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas.

94.

Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.

97.

Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and

b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

And;

The Lambeth Local Plan 2020-2032 Section 10: Quality of the Built Environment, Policy Q3: Safety, Crime Prevention and Counter Terrorism.

Kind Regards,

█



"Try a crime you end a criminal, treat an environment you end crime."
Abhijit Naskar, Sleepless for Society

-----Original Message-----

From: Beresford Chet - Professionalism Headquarters

Sent: 23 August 2022 13:10

To: [REDACTED]
Subject: FW: 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL

[REDACTED]

One from the mailbox - the deadline is 6/9.

With thanks,

[REDACTED]
Sergeant | South East Designing Out Crime Office Metropolitan Police Service Crime Prevention, Inclusion and Engagement (CPIE) Professionalism Headquarters

[REDACTED]

-----Original Message-----

From: [REDACTED]
Sent: 23 August 2022 12:31
To: [REDACTED]
Subject: 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL

Please See Attached

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<https://eur02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.lambeth.gov.uk%2Femail-disclaimer&data=05%7C01%7CSean.N.Hathaway%40met.police.uk%7C5e8217564a4fa272f708da85005ed2%7Cf3ee2a7e72354d28ab42617c4c17f0c1%7C0%7C0%7C637968534881432753%7CUnknown%7CTWFPbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=%2Fmq51ksuQeEHNvWqg0nBXhaoCwqRupeumq795iR7B%2BM%3D&reserved=0>
<https://eur02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.lambeth.gov.uk%2Femail-disclaimer&data=05%7C01%7CSean.N.Hathaway%40met.police.uk%7C5e8217564a4fa272f708da85005ed2%7Cf3ee2a7e72354d28ab42617c4c17f0c1%7C0%7C0%7C637968534881432753%7CUnknown%7CTWFPbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=h1%2BTGpgvNIXutNKWs84gZU0MwVnC9vdVxtwPZ5eGtSM%3D&reserved=0>

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From: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>
Sent: 07 September 2022 09:16
To: Planning [REDACTED]
Subject: RE: 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL

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FAO Miss [REDACTED]

Proposed Development 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road, London, SE1 8UL

For: Demolition of 99-101 Waterloo Road, 103-107 Waterloo Road, 124 and 126 Cornwall Road and redevelopment for a new office building (Class E g) and flexible ancillary uses (Class E a, b) together with the refurbishment of 109-119 Waterloo Road (Mercury House) for Class E a, b, and g uses, and works to the public highway, public realm, new landscaping, ancillary and enabling works, plant and equipment

Thank you for your consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards

I

[REDACTED]
Safeguarding Engineer (LU+DLR)
Infrastructure Protection
Email [REDACTED]

TfL Engineering | 5 Endeavour Square, Stratford, London E20 1JN



Find out more about Infrastructure Protection - <https://youtu.be/0hGoJMTBOEg>

-----Original Message-----

From: lambethplanning@Lambeth.gov.uk <lambethplanning@Lambeth.gov.uk>

Sent: 23 August 2022 12:34

To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>

Subject: 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL

Please See Attached

Disclaimers apply - full details at www.lambeth.gov.uk/email-disclaimer<<https://www.lambeth.gov.uk/email-disclaimer>>

This message has been scanned for malware by Forcepoint. www.forcepoint.com

From: [REDACTED] on behalf of XHREPlanningTechSupport
Sent: 13 September 2022 13:03
To: [REDACTED]
Subject: FW: Our DTS Ref: 67317 Your Ref: 22/02489/FUL - 91,99-101, 103-109, 117 & 119 , WATERLOO ROAD, LONDON, -, SE1 8UL

H [REDACTED],

This has now been logged on to uniform.

Kind Regards,

I
[REDACTED]

Technical Validation Officer
Sustainable Growth and Opportunity Directorate
London Borough of Lambeth
PO BOX 734 Winchester SO23 5DG

Working Days: Tuesday's and Thursday's

Email [REDACTED]

www.lambeth.gov.uk/planning

Items for courier or hand delivery should be delivered to:
Lambeth Council, Civic Centre Planning, Transport & Development, 3rd floor, 6 Brixton Hill London SW2 1EG



Please consider the environment before printing this e-mail



From: [REDACTED] On Behalf Of Planning
Sent: 13 September 2022 08:29
To: XHREPlanningTechSupport <PlanningTechSupport@lambeth.gov.uk>
Subject: FW: Our DTS Ref: 67317 Your Ref: 22/02489/FUL - 91,99-101, 103-109, 117 & 119 , WATERLOO ROAD, LONDON, -, SE1 8UL

Good Morning,

Please see email below which requires your attention.

Kind regards

[REDACTED]
Customer Services Officer
Residents Experience & Digital
Resident Services
02079261000

[REDACTED]
www.lambeth.gov.uk

From: [REDACTED]
Sent: 13 September 2022 08:18
To: Planning [REDACTED]
Subject: Our DTS Ref: 67317 Your Ref: 22/02489/FUL - 91,99-101, 103-109, 117 & 119 , WATERLOO ROAD, LONDON, -, SE1 8UL

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ousing & Environment Phoenix House, 1st Floor St George Wharf 10 Wandsworth Road London SW8 2LL Our DTS Ref: 67317 Your Ref: 22/02489/FUL

03-109, 117 & 119 , WATERLOO ROAD, LONDON, -, SE1 8UL

ts
ion provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has attempted to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available. We request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been received from Thames Water that sufficient foul water capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Planning Authority and Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All Foul water network upgrades required to accommodate the additional flows from the development shall be completed before occupation. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified shall be completed before occupation to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition from Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or insufficient, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0207 926 1000) before the planning application approval.

ion provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has attempted to obtain this information and agree a position for SURFACE WATER drainage, but have been unable to do so in the time available. We request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been received from Thames Water that sufficient surface water capacity exists off site to serve the development or 2. A development and infrastructure phasing plan has been agreed with the Local Planning Authority and Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Or 3. All Surface water network upgrades required to accommodate the additional flows from the development shall be completed before occupation. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified shall be completed before occupation to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition from Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or insufficient, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0207 926 1000) before the planning application approval.

uilding regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection against flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage system is at full capacity and level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public sewer, the Applicant must obtain a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution.

Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater d. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [Thameswater.co.uk](mailto: Thameswater.co.uk) . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business charges section.

S
mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If any works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance access, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. [Thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes](https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes)

If your development is located within 15m of our underground water assets and as such we would like the following informative attached to any application. If your development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate action is not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow when working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

Investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available. We request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been received that the following conditions have been completed; or - a development plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Reason - The development may require mains and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website www.thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the planning application, the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application being submitted for approval.

Comments

Section 6.3 Sewers and Local Drainage of the FRA is incorrect, Thames Water does have records of hydraulic flooding at the location of the development. The questionnaire provided in Appendix D was not comprehensive and did not request the history of all the address points in this site. Because of the location, we recommend the development include property level protection to prevent against internal hydraulic flooding for both building and the surrounding area. SuDS should be considered at Mercury House within the abilities of the renovation, for example rainwater reuse for landscaping, installation of a blue-green roof or attenuation tanks in the basement. The Mercury House proposal does not follow London Plan Policy SI 1 (the drainage hierarchy) and meet greenfield runoff rates. The fact that it is a renovation does not preclude it from following planning guidelines. Due to capacity concerns in the area, combined flow rates should not increase from this site and there is considerable increase in foul flows to the sewer. Rainwater reuse should also be considered. Drainage details (including point of connection into the public sewer) for Mercury House not included. A detailed assessment of flow between them or contributing area is required to assess the impact on the sewer. Connection: Connecting directly into a trunk or chemical sewer can be complex and dangerous, therefore they should only be considered where no other options are available. We don't allow connections to trunk sewers in greater London – instead, you will need to connect to a non-trunk sewer or requisition a new connection and associated pipe laying from us. If you apply for a requisition we'll consider the application on a case by case basis, which may not be your preferred connection point. Where a connection into a trunk or chemical sewer is necessary, we will inspect the connection and recharge you under Section 107 of the Water Industry Act 1991. An application to connect must be submitted to Thames Water Development Planning Department as possible to allow time to conduct technical reviews and surveys as required – costs will apply. Please see more information on the application process www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes.

Development Planning Department

Thames Water, Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ Tel:020 3577 9998 Email: devcon.team@thameswater.co.uk

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Historic England

Direct Dial: 0207 973 3777

Our ref: PA01188406

26 July 2022

Dear

Pre-application Advice

WATERLOO CENTRAL LONDON SE1 8UL

Summary

The proposals are for redevelopment of a number of buildings in order to create a new tall building on a prominent corner site on Waterloo Road.

Due to its height, scale and materials, the proposed building would affect the setting of a variety of heritage assets, including the Old Vic, Former Waterloo Fire Station and a number of conservation areas. In respect to the impact on the setting of heritage assets immediately around the site, it is not possible to fully assess the degree of impact due to the limited viewing positions presented in the Townscape and Visual Impact Assessment.

In relation to heritage assets further afield, those most likely to be affected are within the Mitre Road and Ufford Street Conservation Area and the Roupell Street Conservation Area. The proposals are seen in a number of views and are considered to have a degree of harmful impact.



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We therefore recommend that the proposed harm is justified and wherever possible, avoided or mitigated.

Significance

The site fronts onto Waterloo Road to the west, Cornwall Road to the east and Emma Cons Gardens to the south. The site contains a wide variety of buildings that mostly date from the mid and late 20th Century, many of which are of little architectural or historic interest. The most notable buildings within the site are 124 and 126 Cornwall Road, which are likely to date from the late 19th or early 20th Century. These buildings tell the story of the former industrial character of this area and are robustly constructed in high quality brick with cut brick window heads and loading doors.

Whilst the site is not contained within a conservation area or includes any listed buildings, we would consider the buildings at 122 and 124 Cornwall Road to be of some heritage interest. We also consider the iron façade of Waterloo Station and associated bridges to be of some interest and to make a strong contribution to the local street scene, albeit these buildings are not listed.

The site is also located in close proximity to a number of designated heritage assets, including conservation areas and listed buildings. Due to the fact that the proposals include the provision of a tall building (above 45 metres), it is likely that there will be impacts on the setting of heritage assets located some distance away from the site. Therefore, there may be heritage assets affected by the proposals that are not noted below.

To the south east of the site is the Mitre Road and Ufford Street Conservation Area, which comprises terraces of houses and apartment blocks laid out in the early 1900s and a small park with mature trees.

To the south west of the site is Lower Marsh Conservation Area. Lower Marsh is one of the most historic routes in Lambeth and was likely to have been laid out in its current form in the 18th Century. Whilst the buildings fronting onto Lower Marsh have been successively redeveloped over the years, the original form and narrow plot width of this former early commercial street are still evident. At the eastern end of the conservation area, is the Former Waterloo Road Fire Station, which lies opposite the site. This distinctive Edwardian Baroque style building dates from 1908-11 and was designed for the London County Council possibly by HFT Cooper incorporating glazed bricks and appliance bays at ground floor level, decorative stone cornicing and quoins to windows at the upper levels and tall dormer windows at roof level. In recognition of the historic and architectural significance of this building it is Grade II listed. Whilst we have not identified the southernmost building on the application site as being of any historic interest, we are aware that the building addresses the street at a scale and will



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a palate of materials that appears complimentary to the former fire station and the street frontage of Waterloo Station.

Roupell Street and Lambeth Conservation Areas lie to the north of the site. Roupell Street Conservation Area comprises an estate of modest two storey terrace houses laid out by John Palmer Roupell between 1820 and 1840. In recognition of the rare survival of this building type, the architectural character and completeness as a group, many of the buildings within the estate are Grade II listed.

To the south of the site, on the opposite side of Emma Cons Gardens is the Old Vic Theatre, which is noted as one of the oldest theatres to survive in England, being originally built in 1816-18 and retaining many features of interest. The north elevation is a recreation of the original façade and comprises a five-bay colonnade, whilst the Waterloo Road elevation is likely to be largely original. In recognition of the age of the theatre, its rich architectural and historic interest, it is Grade II* listed.

Associated with the Old Vic is the National Theatre Studio on The Cut, which dates from the late 1950s and is Grade II listed for its modernist architecture and operational relationship with the Old Vic.

Impact

The proposals will introduce additional development into the setting of several heritage assets. This is due to the prominent location of the site and the proposed scale and height of the building.

In considering the submitted Townscape and Visual Impact Assessment (TVIA), it is evident that the largest impacts of the proposed building are likely to be on the area immediately around the site and on local conservation areas that are relatively restrained in height, such as the Mitre Road and Ufford Street Conservation Area and Roupell Street Conservation Area.

In the area immediately around the site, the building is likely to impact on the setting of the Old Vic, the Former Waterloo Road Fire Station and on the Waterloo Road elevation of Waterloo Station. It is not possible to fully assess the degree of impact on the setting of these heritage assets due to the limited viewing positions presented in the TVIA and the presence of the trees in leaf within the given views. In the Position section below, we give recommendations on additional views and request that these be wintertime views.

In some TVIA views, we consider there to be a degree of harm arising from the proposed development where it is seen in the setting of various conservation areas, as illustrated in the following views in the TVIA:



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- View 8 at the junction of Whittlesey Street/Windmill Walk - the proposed building would appear over the rooftops of the Grade II listed buildings in Roupell Street. The proposed building would be seen along with the existing brick towers of the Union Jack Club and Capital Tower and would appear as an additional intrusion on the skyline. It would visually contrast with the scale, materials, colour and detailing of the foreground listed buildings within the conversion area.
- View 9 at the junction of Roupell Street and Threed Street - the proposed building would appear on the skyline over the foreground buildings on Roupell Street affecting the ability of the viewer to see the silhouette of the roofs and chimneys of these listed buildings within the conservation area.
- View 22 at Ufford Road Park - there would be a large and dominant new element on the skyline over the foreground buildings on Mitre Road affecting the ability of the viewer to see the silhouette of the roofs and chimneys of the conservation area buildings.

Policy

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) set out the obligation on local planning authorities to pay special regard to safeguarding the special interest of listed buildings and their settings, and preserving or enhancing the character or appearance of conservation areas.

The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the 12 core principles that define sustainable development.

Paragraph 197 advises local authorities to take account of the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraphs 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Paragraph 202 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate,



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securing its optimum viable use.

Paragraph 206 states that local planning authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably

Historic England advice notes are also likely to be of relevance in this case and we would refer you to 'Tall Buildings Advice: Historic England Advice Note 4'. This note focuses on the importance of a plan-led approach to tall building development, emphasises the need for good design and a clear understanding of the impact of proposals on the significance and setting of heritage assets.

The adopted Lambeth Local Plan 2020-2035 contains policies relating to conservation areas, non-designated heritage assets, tall buildings and the Waterloo Area. We note that Policy Q26 Part B states that outside the locations identified in Annex 10 or as identified in site allocations, there is no presumption in favour of tall building development. In referring to Appendix 10, this shows that the site falls within Location W6 entitled 'Waterloo Road/Cornwall Road' which indicates 70m AOD stepping down to the south.

Position

We note the proposed demolition of 122 and 124 Cornwall Road and the loss of part of the former industrial history of the area. As such, we would recommend that these buildings are fully recorded prior to any demolition.

As set out in the Impact section above, it is likely that the proposed development will have an impact on the setting of heritage assets immediately around the site. These include the Old Vic, the Former Waterloo Road Fire Station, the Waterloo Road elevation of Waterloo Station and on the Lower Marsh Conservation Area in views along Waterloo Road. In order to fully assess this impact, we would recommend that further visual assessment is provided as part of the TVIA, including the following:

- View from the north side of The Cut from the junction of Cornwall Road showing the site proposals in the context of the Old Vic.
- View looking north along Waterloo Road from the junction with The Cut showing the site proposals in the context of the Former Waterloo Road Fire Station and Waterloo Station.
- View looking south along Waterloo Road from the centre of the road outside the Union Jack Club showing the site proposals in the context of the Former Waterloo Road Fire Station and Waterloo Station.



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For each of these views, we would recommend that a winter photograph is used. This will show the impact of the proposals when the trees are not in leaf and there is better visibility through to the buildings beyond.

The proposals include the provision of a tall building and are therefore likely to have an impact on the setting of heritage assets beyond the immediate environs of the site.

We have considered the views given in the TVIA and conclude that the highest impacts are likely to be on the setting of the Mitre Road and Ufford Street Conservation Area and on the Roupell Street Conservation Area, where the proposals are visible over the rooftops of the conservation area buildings. In the case of the Roupell Street views, the proposals affect the setting of listed buildings.

In accordance with policies set out in the NPPF, such harm should be justified and where possible, that harm should be avoided or mitigated. As such, we would recommend exploring further options for massing and elevational design where possible. The harm would also need to be weighed against any public benefits of the proposals, in accordance with paragraph 202.

Next Steps

Thank you for involving us at this stage of pre-application discussions. We would be happy to provide further advice, as necessary. Details of our Extended Pre-applications service can be found on our website at www.HistoricEngland.org.uk/EAS ~~<http://www.HistoricEngland.org.uk/EAS>~~. If you would like to discuss this option further, please do contact me.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely



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Historic England

Claire Brady
Inspector of Historic Buildings and Areas
E-mail: claire.brady@HistoricEngland.org.uk

WATERLOO CENTRAL LONDON SE1 8UL

Pre-application Advice

Information Provided

Waterloo Central Townscape and Visual Impact Assessment document by Miller Hare Limited, dated January 2022

Waterloo Central Design and Access Statement by Buckley Gray Yeoman Architects dated 24 June 2022

Waterloo Central Heritage Assessment by The Townscape Consultancy dated January 2022



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Historic England

[REDACTED]
Lambeth Council
Planning, Regeneration and Enterprise
Development Management
Phoenix House, 10 Wandsworth Road
London
SW8 2LL

Direct Dial: [REDACTED]

Our ref: P01541473

15 September 2022

Dear Miss [REDACTED]

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**9-101, 103/107, 117 AND 109-119 WATERLOO ROAD AND 124-126 CORNWALL
ROAD LONDON SE1 8UL
Application No. 22/02489/FU**

Thank you for your letter of 23 August 2022 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Historic England was given the opportunity to comment on these proposals at pre-application stage. We understand that the submitted scheme is very similar to that which we saw at pre-application stage.

I attach a copy of our pre-application letter for reference.

In summary, our comments and concerns are the same as those raised at pre-application stage, as follows:

We consider there to be insufficient information to fully assess the impact of the proposals on the setting and significance of heritage assets immediately around the site, including the Old Vic, the Former Waterloo Road Fire Station, the Waterloo Road elevation of Waterloo Station and on the Lower Marsh Conservation Area in views along Waterloo Road. In order to fully assess this impact, we would recommend that further visual assessment is provided.

The proposals include the provision of a tall building and therefore, are likely to have an impact on the setting of heritage assets beyond the immediate environs of the site. We have considered the views given in the TVIA and conclude that the highest impacts are likely to be on the setting of the Mitre Road and Ufford Street



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Conservation Area and on the Roupell Street Conservation Area, where the proposals are visible over the rooftops of the conservation area buildings and visually interfere with the interesting rooftop silhouettes of those buildings. In the case of the Roupell Street views, the proposals affect the setting of listed buildings.

In accordance with policies set out in the National Planning Policy Framework, such harm should be justified and where possible, that harm should be avoided or mitigated. As such, we would recommend exploring further options for massing and elevational design where possible. If the Council is minded to approve planning permission, this harm would also need to be weighed against any public benefits of the proposals, in accordance with paragraph 202.

Recommendation

Historic England has concerns regarding the application on heritage grounds. *Freetext section for compliance with statute and policy. For example (delete as appropriate):*

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraph 202 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:



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Historic England

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

I

[REDACTED]

Inspector of Historic Buildings and Areas

E-mail [REDACTED]



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Your ref:
My ref: 22/05780/OBS

Please reply to:
Tel No: [REDACTED] 6
Email: southplanningteam@westminster.gov.uk

Miss [REDACTED]
Lambeth Council
Lambeth Planning
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Winchester
SO23 5DG

Development Planning
Westminster City Council
PO Box 732
Redhill, RH1 9FL

31 August 2022

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 22/05780/OBS

Application Date:

Date Received: 23.08.2022

Date Amended: 23.08.2022

Plan Nos: Letter dated 23 August 2022 from Lambeth Council (Ref: 22/02489/FUL).

Address: Development Site 99 - 119 Waterloo Road And 109 - 126 Cornwall Road, Waterloo Road, London Borough Of Lambeth, London

Proposal: Demolition of 99-101 Waterloo Road, 103-107 Waterloo Road, 124 and 126 Cornwall Road and redevelopment for a new office building (Class E g) and flexible ancillary uses (Class E a, b) together with the refurbishment of 109-119 Waterloo Road (Mercury House) for Class E a, b, and g uses, and works to the public highway, public realm, new landscaping, ancillary and enabling works, plant and equipment.

Yours faithfully



Director of Place Shaping and Town Planning

Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



Environment Department
Juliemma McLoughlin
Executive Director Environment



Lambeth Planning
Attn [REDACTED]
PO BOX 734
Winchester
SO23 5DG

Telephone 020 7332
Fax 020 7332 1806
Email
[REDACTED]

Your ref
Our ref 22/00820/OBS

Case Officer
[REDACTED]

Date 3 November 2022

Town and Country Planning Act 1990

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

In response to your notification received on 23 August 2022, Please see our comments below:

SCHEDULE

Application Number: **22/00820/OBS**

Location: **99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road, London, SE1 8UL**

Proposal : **Demolition of 99-101 Waterloo Road, 103-107 Waterloo Road, 124 and 126 Cornwall Road and redevelopment for a new office building (Class E g) and flexible ancillary uses (Class E a, b) together with the refurbishment of 109-119 Waterloo Road (Mercury House) for Class E a, b, and g uses, and works to the public highway, public realm, new landscaping, ancillary and enabling works, plant and equipment.**

CONDITIONS

- 1 The City does not wish to make any observations in relation to this proposal.



Planning and Development Director
Date of issue: 3 November 2022

[REDACTED]

From: [REDACTED] XHREPlanningTechSupport
Sent: 10 February 2023 15:02
To: [REDACTED]
Subject: FW: Network Rail Consultation Response for 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road, London, SE1 8UL
Attachments: ASPRO Informatives 2021.pdf

H [REDACTED]

FYA below and attached.

Uniform has been updated.

rgds

From: Planning <XHREPlanning@lambeth.gov.uk>
Sent: 08 February 2023 14:13
To: XHREPlanningTechSupport <PlanningTechSupport@lambeth.gov.uk>
Subject: FW: Network Rail Consultation Response for 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road, London, SE1 8UL

Good Afternoon,

Please see email below which requires your attention.

Kind regards

[REDACTED]
Customer Services Officer
Residents Experience & Digital
Resident Services
02079261000

[REDACTED]
www.lambeth.gov.uk

From: [REDACTED]
Sent: 07 February 2023 12:24
To: Planning <XHREPlanning@lambeth.gov.uk>
Subject: Network Rail Consultation Response for 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road, London, SE1 8UL

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OFFICIAL

Dear Planning Team,

Network Rail Consultation Response: 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road, London, SE1 8UL

Thank you for consulting Network Rail on the above planning application, please see our formal comments below.

Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland and Wales. As statutory undertaker, NR is under license from the Department for Transport (DfT) and Transport Scotland (TS) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway.

Due to the close proximity of the proposed works to Network Rail's land and the operational railway, Network Rail requests that, where applicable, the applicant / developer follows the attached Asset Protection informatives which are issued to all proposals within close proximity to the railway.

Should you wish to discuss any of the informatives, please contact our Asset Protection team via AssetProtectionWessex@NetworkRail.co.uk.

I trust the above is clear, please do not hesitate to contact me if you require any additional information from Network Rail.

Kind regards,



[Redacted]
Town Planning Technician
Network Rail Property (Southern)
Office Address: 1 Puddle Dock, London, EC4V 3DS
Email: [Redacted]
Mobile: TBC
Website: www.networkrail.co.uk

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Liability cannot be accepted for statements made which are clearly the sender's own and not made on behalf of Network Rail.

Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN.

Asset Protection Informatives for works in close proximity to Network Rail's infrastructure

The developer must ensure that their proposal, both during construction and after completion does not:

- encroach onto Network Rail land
- affect the safety, operation or integrity of the company's railway and its infrastructure
- undermine its support zone
- damage the company's infrastructure
- place additional load on cuttings
- adversely affect any railway land or structure
- over-sail or encroach upon the air-space of any Network Rail land
- cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

Network Rail strongly recommends the developer complies with the following comments and requirements to maintain the safe operation of the railway and protect Network Rail's infrastructure.

Future maintenance

The applicant must ensure that any construction and subsequent maintenance can be carried out to any proposed buildings or structures without adversely affecting the safety of/or encroaching upon Network Rail's adjacent land and air-space. Therefore, any buildings are required to be situated at least **2 metres (3m for overhead lines and third rail)** from Network Rail's boundary.

This requirement will allow for the construction and future maintenance of a building without the need to access the operational railway environment. Any less than **2m (3m for overhead lines and third rail)** and there is a strong possibility that the applicant (and any future resident) will need to utilise Network Rail land and air-space to facilitate works as well as adversely impact upon Network Rail's maintenance teams' ability to maintain our boundary fencing and boundary treatments. Access to Network Rail's land may not always be granted and if granted may be subject to railway site safety requirements and special provisions with all associated railway costs charged to the applicant.

As mentioned above, any works within Network Rail's land would need approval from the Network Rail Asset Protection Engineer. This request should be submitted at least 20 weeks before any works are due to commence on site and the applicant is liable for all associated costs (e.g. all possession, site safety, asset protection presence costs). However, Network Rail is not required to grant permission for any third-party access to its land.

Plant & Materials

All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 3.0m of the boundary with Network Rail.

Drainage

Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains except by agreement with Network Rail. Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property. Proper provision must be made to accept and continue drainage discharging from Network Rail's property; full details to be submitted for approval to the Network Rail Asset Protection Engineer. Suitable foul drainage must be provided separate from Network Rail's existing drainage. Soakaways, as a means of storm/surface water disposal must not be constructed within **20 metres** of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property. After the completion and occupation of the development, any new or exacerbated problems attributable to the new development shall be investigated and remedied at the applicants' expense.

Scaffolding

Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The applicant/applicant's contractor must consider if they can undertake the works and associated scaffold/access for working at height within the footprint of their property boundary.

Piling

Where vibro-compaction/displacement piling plant is to be used in development, details of the use of such machinery and a method statement should be submitted for the approval of the Network Rail's Asset Protection Engineer prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.

Fencing

In view of the nature of the development, it is essential that the developer provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. The 1.8m fencing should be adjacent to the railway boundary and the developer/applicant should make provision for its future maintenance and renewal without encroachment upon Network Rail land. Network Rail's existing fencing / wall must not be removed or damaged and at no point during or post construction should the foundations of the fencing or wall or any embankment therein, be damaged, undermined or compromised in any way. Any vegetation within Network Rail's land boundary must not be disturbed. Any fencing installed by the applicant must not prevent Network Rail from maintaining its own fencing/boundary treatment.

Lighting

Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers' vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of their detailed proposals regarding lighting.

Noise and Vibration

The potential for any noise/vibration impacts caused by the proximity between the proposed development and any existing railway must be assessed in the context of the National Planning Policy Framework which hold relevant national guidance information. The current level of usage may be subject to change at any time without notification including increased frequency of trains, night time train running and heavy freight trains.

Vehicle Incursion

Where a proposal calls for hard standing area/parking of vehicles area near the boundary with the operational railway, Network Rail would recommend the installation of a highways approved vehicle incursion barrier or high kerbs to prevent vehicles accidentally driving or rolling onto the railway or damaging lineside fencing.

Landscaping

Any trees/shrubs to be planted adjacent to the railway boundary these shrubs should be positioned at a minimum distance greater than their predicted mature height from the boundary. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary as the species will contribute to leaf fall which will have a detrimental effect on the safety and operation of the railway. Network Rail wish to be involved in the approval of any landscaping scheme adjacent to the railway. Any hedge planted adjacent to Network Rail's boundary fencing for screening purposes should be so placed that when fully grown it does not damage the fencing or provide a means of scaling it. No hedge should prevent Network Rail from maintaining its boundary fencing. If required, Network Rail's Asset Protection team are able to provide more details on which trees/shrubs are permitted within close proximity to the railway.

Existing Rights

The applicant must identify and comply with all existing rights on the land. Network Rail request all existing rights, covenants and easements are retained unless agreed otherwise with Network Rail.

Property Rights

notwithstanding the above, if any property rights are required from NRIL in order to deliver the development, NRIL's Property team will need to be contacted'

If you would like to discuss any of the above, please contact your local Network Rail's Asset Protection team:

Anglia: AssetProtectionAnglia@Networkrail.co.uk


Kent and Sussex: AssetProtectionLondonSouthEast@NetworkRail.co.uk

Wessex: AssetProtectionWessex@NetworkRail.co.uk

To identify your route, please use the link: <https://www.networkrail.co.uk/running-the-railway/our-routes>

Your ref:
My ref: 23/00565/OBS

Please reply to:
Tel No: 07866037846
Email: southplanningteam@westminster.gov.uk


Lambeth Council
Lambeth Planning
PO Box 734
Winchester
SO23 5DG

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

9 February 2023

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 23/00565/OBS

Application Date:

Date Received: 27.01.2023

Date Amended: 27.01.2023

Plan Nos: Letter dated 27th January 2023 from Lambeth Council (Ref: 22/02489/FUL).

Address: Development Site 99 - 119 Waterloo Road And 109 - 126 Cornwall Road, Waterloo Road, London Borough Of Lambeth, London

Proposal: Demolition of 99-101 Waterloo Road, 103-107 Waterloo Road, 124 and 126 Cornwall Road and redevelopment comprising a new 20 storey office building (Class E (g)) and flexible ancillary uses (Class E (a), (b)) together with the refurbishment of 109-119 Waterloo Road ('Mercury House') for flexible Class E to a specified area, and Class E (a), (b), (g) and Sui Generis (bar) uses to specified areas, and basement excavation, works to the public highway, public realm, new landscaping, ancillary and enabling works, plant and equipment.

This is a re-consultation due to revised description of development and revised details relating to Use Classes including additional information.

Yours faithfully


Director of Town Planning & Building Control

Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



[REDACTED]

From: XHREPlanningTechSupport
Sent: 06 February 2023 12:20
To: [REDACTED]
Subject: RE: 3rd Party Planning Application - 22/02489/FUL - updated info

H [REDACTED]

Here is a consultee comment for application 22/02489/FUL has been logged.

Kind Regards,

[REDACTED]
Technical Support Officer – Planning
Planning, Transport and Development
Neighbourhoods and Growth
E-mail [REDACTED]
www.lambeth.gov.uk

London Borough of Lambeth
PO Box 734, Winchester, S023 5DG

-----Original Message-----

From: Planning <XHREPlanning@lambeth.gov.uk>
Sent: 06 February 2023 08:06
To: XHREPlanningTechSupport <PlanningTechSupport@lambeth.gov.uk>
Subject: FW: 3rd Party Planning Application - 22/02489/FUL - updated info

Good Morning,

Please see email below which requires your attention.

Kind regards

[REDACTED]
Customer Services Officer
Residents Experience & Digital
Resident Services
02079261000
[REDACTED]
www.lambeth.gov.uk

-----Original Message-----

From: BCTAdmin@thameswater.co.uk <BCTAdmin@thameswater.co.uk>
Sent: 03 February 2023 13:13
To: Planning <XHREPlanning@lambeth.gov.uk>
Subject: 3rd Party Planning Application - 22/02489/FUL - updated info

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Regeneration, Housing & Environment
Phoenix House, 1st Floor
St George Wharf
10 Wandsworth Road
London
SW8 2LL

Our DTS Ref: 67317
Your Ref: 22/02489/FUL - updated info

3 February 2023

Dear Sir/Madam

Re: 91,99-101, 103-109, 117 & 119 , WATERLOO ROAD, LONDON, -, SE1 8UL

Waste Comments

Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via <https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C01%7CRVrlc%40lambeth.gov.uk%7C471c3529924d4a779a5808db083c8535%7Cc4f22780485f4507af4a60a971d6f7fe%7C0%7C0%7C638112828246801241%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6lk1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=gf6kn4JQaeJa0ATffkKLjGW249OIx7JDBOArnUlo3I%3D&reserved=0>. Please refer to the Wholesale; Business customers; Groundwater discharges section.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C01%7CRVrlc%40lambeth.gov.uk%7C471c3529924d4a779a5808db083c8535%7Cc4f22780485f4507af4a60a971d6f7fe%7C0%7C0%7C638112828246801241%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6lk1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=EB3U4t4k662niILTav5vFolAahHKKe8XMH20D1jGySg%3D&reserved=0>

The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other

structures.<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=05%7C01%7CRVrlc%40lambeth.gov.uk%7C471c3529924d4a779a5808db083c8535%7Cc4f22780485f4507af4a60a971d6f7fe%7C0%7C0%7C638112828246801241%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=S773MjDIDXn410e5vYFZs3%2FmS3fuzmbUcRxGj3npWv4%3D&reserved=0>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via <https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C01%7CRVrlc%40lambeth.gov.uk%7C471c3529924d4a779a5808db083c8535%7Cc4f22780485f4507af4a60a971d6f7fe%7C0%7C0%7C638112828246801241%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=gf6kn4JQaeJa0ATffkKlJGW2490IXr7JDBOArnUlo3I%3D&reserved=0>. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2FPlanning-your-development%2FWorking-near-our-pipes&data=05%7C01%7CRVrlc%40lambeth.gov.uk%7C471c3529924d4a779a5808db083c8535%7Cc4f22780485f4507af4a60a971d6f7fe%7C0%7C0%7C638112828246801241%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=EB3U4t4k662niLTa5vVFolAahHKKe8XMH20D1jGySg%3D&reserved=0> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Farger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C01%7CRVrlic%40lambeth.gov.uk%7C471c3529924d4a779a5808db083c8535%7Cc4f22780485f4507af4a60a971d6f7fe%7C0%7C0%7C638112828246801241%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=EB3U4t4k662niLTa5vVFolAahHKKe8XMH20D1jGySg%3D&reserved=0>

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
Tel:020 3577 9998
Email: devcon.team@thameswater.co.uk

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<https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.twitter.com%2Fthameswater&data=05%7C01%7CRVrlic%40lambeth.gov.uk%7C471c3529924d4a779a5808db083c8535%7Cc4f22780485f4507af4a60a971d6f7fe%7C0%7C0%7C638112828246801241%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Eq1EmmN65tZ7rh9mqu%2FaGliue37mdyhdsEccAz5GMIw%3D&reserved=0> or find us on

<https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.facebook.com%2Fthameswater&data=05%7C01%7CRVrlic%40lambeth.gov.uk%7C471c3529924d4a779a5808db083c8535%7Cc4f22780485f4507af4a60a971d6f7fe%7C0%7C0%7C638112828246801241%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=K6Qj%2FfsMc0wp0l4N1z9D0fNjcdiamc13cC0LxjWcb2Q%3D&reserved=0>. We're happy to help you 24/7.

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From: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>
Sent: 03 February 2023 13:46
To: Planning [REDACTED]
Subject: RE: 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL

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FA [REDACTED]

Application No: 22/02489/FUL

Site address: 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road, London, SE1 8UL

Proposal: Demolition of 99-101 Waterloo Road, 103-107 Waterloo Road, 124 and 126 Cornwall Road and redevelopment comprising a new 20 storey office building (Class E (g)) and flexible ancillary uses (Class E (a), (b)) together with the refurbishment of 109-119 Waterloo Road ('Mercury House') for flexible Class E to a specified area, and Class E (a), (b), (g) and Sui Generis (bar) uses to specified areas, and basement excavation, works to the public highway, public realm, new landscaping, ancillary and enabling works, plant and equipment.
This is a re-consultation due to revised description of development and revised details relating to Use Classes including additional information.

Thank you for your consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

[REDACTED]
Safeguarding Engineer (LU+DLR) | Infrastructure Protection
5 Endeavour Square | 7th Floor Zone B | Westfield Avenue | E20 1JN



-----Original Message-----

From: lambethplanning@Lambeth.gov.uk <lambethplanning@Lambeth.gov.uk>
Sent: 27 January 2023 18:31
To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>

Subject: 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL

Please See Attached

Disclaimers apply - full details at www.lambeth.gov.uk/email-disclaimer<<https://www.lambeth.gov.uk/email-disclaimer>>

This message has been scanned for malware by Forcepoint. www.forcepoint.com

From: [REDACTED]
Sent: 31 January 2023 16:00
To: Rozina Vrljic
Subject: Planning reference: 23/OB/0006 - Status update

You don't often get email from [REDACTED]

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir/Madam,

Our Reference: 23/OB/0006

Your Reference: 22/02489/FUL

Site address: 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road, London SE1

Proposal: Demolition of 99-101 Waterloo Road, 103-107 Waterloo Road, 124 and 126 Cornwall Road and redevelopment comprising a new 20 storey office building (Class E (g)) and flexible ancillary uses (Class E (a), (b)) together with the refurbishment of 109-119 Waterloo Road ('Mercury House') for flexible Class E to a specified area, and Class E (a), (b), (g) and Sui Generis (bar) uses to specified areas, and basement excavation, works to the public highway, public realm, new landscaping, ancillary and enabling works, plant and equipment

Thank you for your application.

I am the Case Officer and I am going to check the application documents to ensure it is valid and that there is no additional information required. This is to ensure your decision is issued on time and assessment of your submission is undertaken without delay. I will come back to you if there are any issues with your application requiring your attention.

If there are no issues I may contact you to arrange a site visit in the coming weeks if necessary. Please contact me if you have not received confirmation that your application is valid within 5 days of this letter.

Do also get in touch if you have any further queries or require additional information on the planning process.

Please note that the Council provides a paid for pre-application advice service to minimise the number of amendments submitted after submission. Making amendments to applications places a burden on the case officer and service in general mainly through additional assessment and re-consultation where it might be required. The acceptance of any amendments to live applications is entirely at the discretion of the Council and is not required by the law/legislation. To resolve these issues and to recover the cost of delivering the service, the following changes shall apply to applications valid from the 1st of April 2022: No request for any material amendment will be accepted other than through the new Planning Application Amendment service. Material amendments shall attract a fee proportionate to the work required and the benefit, if any, of the material amendment to the Council and its stakeholders. The acceptance of any material amendments to live applications is entirely at the discretion of the Council.

We are here to help.

Yours faithfully

[REDACTED]
[REDACTED]
[REDACTED]

Southwark Council
Chief Executive Department
Planning Division
Development Management
PO Box 64529
London SE1 5LX

Ema



The email you received and any files transmitted with it are confidential, may be covered by legal and/or professional privilege and are intended solely for the use of the individual or entity to whom they are addressed.

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[REDACTED]

From: Planning
Sent: 01 February 2023 08:13
To: [REDACTED]
Cc: XHREPlanningTechSupport
Subject: FW: 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL
Attachments: SL122213(SB) - 99-119 Waterloo Road.pdf

Good Morning,

Please see email below which requires your attention.

Kind regards

I
[REDACTED]
Customer Services Officer
Residents Experience & Digital
Resident Services
02079261000
[REDACTED]
www.lambeth.gov.uk

From: [REDACTED]
Sent: 31 January 2023 16:51
To: Planning <XHREPlanning@lambeth.gov.uk>
Subject: RE: 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL

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FAO [REDACTED]

Dea [REDACTED]

Thank you for consulting us on this application.

Having reviewed the changes made to the application, our position remains the same. This means that our previous response is unchanged. We have **no objection**, but we have advice relating to flood risk to provide.

Please find our previous response attached.

Kind regards,

[REDACTED]
Planning Advisor | South London Sustainable Places Team
Environment Agency | Seacole Building, 2 Marsham Street, London SW1P 4DF

Email [REDACTED]

-----Original Message-----

From: lambethplanning@Lambeth.gov.uk <lambethplanning@Lambeth.gov.uk>

Sent: 27 January 2023 18:31

To: [REDACTED]

Subject: 22/02489/FUL - 99-101, 103/107, 117 And 109-119 Waterloo Road And 124-126 Cornwall Road London SE1 8UL

Please See Attached

Disclaimers apply - full details at

<https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.lambeth.gov.uk%2Femail-disclaimer&data=05%7C01%7Ckslplanning%40environment-agency.gov.uk%7C58ac8129274646c5982e08db0094971c%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638104411378240798%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=HRp7L4GtN2R%2FyCikkT%2FP30%2F8oxvpE5MiiIftvqBRPZk%3D&reserved=0>
<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.lambeth.gov.uk%2Femail-disclaimer&data=05%7C01%7Ckslplanning%40environment-agency.gov.uk%7C58ac8129274646c5982e08db0094971c%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638104411378240798%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=TLZdly8%2F3ho%2FeI4MJ25dKUsxkoFQiRAYkZp8xaqihxs%3D&reserved=0>

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[REDACTED]
London Borough of Lambeth
Development Control
Phoenix House (10) Wandsworth Road
London
SW8 2LL

Our ref: SL/2022/122213/01-L01
Your ref: 22/02489/FUL
Date: 6 September 2022

Dear [REDACTED]

Demolition of 99-101 Waterloo Road, 103-107 Waterloo Road, 124 and 126 Cornwall Road and redevelopment for a new office building (Class E, G) and flexible ancillary uses (Class E, A, B) together with the refurbishment of 109-119 Waterloo Road (Mercury House) for Class E, A, B, and G uses, and works to the public highway, public realm, new landscaping, ancillary and enabling works, plant and equipment

**99-101, 103/107, 117 and 109-119 Waterloo Road and 124-126 Cornwall Road
London, SE1 8UL**

Thank you for consulting us on this application.

The Environment Agency has **no objection** to the proposed development as submitted.

Flood risk

The site is in Flood Zone 3 and is located within an area benefitting from flood defences. Whilst the site is protected by the River Thames tidal flood defences up to a 1 in 1000 (0.1%) chance in any year, our most recent flood modelling December 2017 shows that the site is at risk if there were to be a breach in the defences.

The submitted Flood Risk Assessment (FRA) (December 2021; AKT II) provides an accurate assessment of the tidal and fluvial flood risks associated with the proposed development.

Please note that our review is based solely on submitted documentation and reported actions, so no responsibility can be taken for the accuracy of any such information.

The Local Planning Authority should consider the submitted FRA when deciding this application in accordance with Paragraph 167 of the [National Planning Policy Framework](#) (NPPF).

We recommend that flood resistant and resilient measures are incorporated in to the design and construction of the development proposals, where practical considerations allow, using guidance contained within the Department for Communities & Local Government (DCLG) document [‘Improving the flood performance of new buildings: flood resilient construction’](#).

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated

Yours sincerely,

E-mai