

Examination of Draft Revised Lambeth Local Plan 2020 - 2035

Matter 8 – Quality of the Built Environment

**Examination Statement on behalf of the London Fire
Commissioner**

Overview

1. This statement has been prepared by Nexus Planning on behalf of the London Fire Commissioner (the LFC), who is currently working in partnership with U+I Group PLC to deliver the redevelopment of its former headquarters site at 8 Albert Embankment (including land to the rear of that), and has fire stations across the Lambeth Borough including at Brixton, Clapham, Lambeth and West Norwood.
2. A summary of the key issues that are of relevance to this Matter are provided below, but the LFC also continues to rely upon its representations to the Regulation 19 consultation (March 2020).

Matter 8: Quality of the Built Environment

8.3 Tall buildings: (i) There is no 'up front' definition of tall buildings in policy Q26 (tall buildings), although there is the table in the explanatory text (paragraph 10.147) and the range of heights which are set out in Annex 11. In view of the relative complexity of developments in parts of Lambeth and some very important townscape considerations, such as the Westminster World Heritage Site, is this approach both justified and realistic? (ii) Does the range of definitions for tall buildings provide some consistency for development management purposes, and if not, what would be appropriate for Lambeth? [Some London Boroughs specify a number of storeys or heights as a yardstick] (iii) There is no inclusion of any criteria in the policy to relate tall buildings to public transport accessibility, which is a crucial relationship; in this regard, should the policy relate to PTAL levels, and if so, how? (iv) How valid are the concerns that tall buildings cause alienation, e.g. in relation to daylight, overshadowing, mutual privacy, microclimate, wind deflection and turbulence, and impact at street level, or is this a matter that can be overcome by sensitive design? (v) Is the presumption against tall buildings in certain areas in Lambeth consistent with national policy? (vi) Some of the representations express concern that the existing tall building policy has not been enforced; if this is true, what is the evidence that this Plan will be more successful than its predecessor? (vii) Is it appropriate for the policy to specify that a public benefits case can be a material justification in relation to proposals to breach the height limits in the table in paragraph 10.147?

3. The approach of Policy 26 (Tall Buildings) is that tall buildings are supported in specific locations (as identified in Annex 11 of the draft Local Plan); and outside of those Annex 11

locations full justification would need to come forwards to demonstrate the appropriateness of that different location for a tall building.

4. The Council's 'Tall Building Topic Paper' (November 2019) is helpful in explaining that it is not possible to preclude the possibility of tall buildings in other parts of the borough, outside the current Annex 11 locations. Indeed in recent years the Council has benefited from 'windfall' opportunities of tall buildings.
5. The reason why Policy 26 is unable to take a more definitive approach is contained in the Topic Paper – that the Council's limited resources do not allow an exhaustive borough-wide survey to identify and test every potential appropriate location. It is therefore inevitable that had the Council had such resource a greater number of appropriate tall building locations would have been identified and included in Annex 11.
6. There is a planning application (reference 19/01304/FUL) submitted by the LFC and U+I for a mixed use development on the Policy PN2 Site 10 allocation of 8 Albert Embankment (and land to the rear), which includes tall buildings of up to 26 storeys in a location not included in Annex 11.
7. This application has been considered by the Council in great detail, resolving to grant planning permission. On matters relating to the proposed tall buildings the officers' reports sets out that:

"The height and massing of the development has been assessed in relation to its impact from a wide range of viewpoints and has been found to be satisfactory, including in relation to its impact on heritage assets. An assessment of the current application has identified less than substantial harm caused. This view is supported by both the GLA and Historic England who have also come to the same conclusion."; and

"There is therefore no objection to the development's height in this location, which has a very high public transport accessibility level. The proposed buildings on the site have been sensitively designed, taking inspiration from the surroundings and historic context of the site, and would respect the character, context and the form and scale of neighbouring buildings and would sit comfortably within the streetscene and surrounding area. The appearance and detailed façade treatment of the development is considered to be high quality, displaying an appropriate response to the surrounding character and the proposal would have no adverse impact on the setting

of nearby listed buildings, conservation areas and protected views.” (Executive summary)

8. The Mayor of London has confirmed he is content for the Council to determine the application in his Stage 2 response, with comments on the height of the buildings including:

“There is general support for tall buildings in the London Plan and intend to publish London Plan within the CAZ, Opportunity Areas and areas that have good access to public transport; and the Vauxhall SPD and the VNEB OAPF both recognise the potential for tall buildings on the site, with the latter identifying Albert Embankment as suitable for buildings of up to 80-90 metres, which both of the taller buildings proposed would be below. The character of the area now includes a number of tall buildings of similar height to those proposed, and the design of the two taller buildings has been given careful consideration in discussions with Historic England, the Council and the GLA; (paragraph 36) and

“As stated at consultation stage, GLA officers consider that the proposed buildings would cause no harm to the significance of the WHS and no harm to LVMF views. The proposals would conserve the Outstanding Universal Value of the WHS.” (paragraph 40); and

“Taking account of the existing and emerging context of tall and large-scale buildings; GLA officers consider that the proposed buildings would cause no harm to the significance of other heritage assets in the vicinity (Conservation Areas, listed buildings, and locally listed buildings), including heritage assets associated with Lambeth Palace.” (paragraph 42)

9. The work to assess and consider the development has provided the resource to fully test Policy PN2 Site 10 as to whether or not it is an appropriate location for tall buildings, which was not available to the Council’s plan making team. Had the Council had the plan making resource to test the site in the same way, the conclusion would have been the same as through the development management process – that the site is an appropriate location for tall buildings.
10. Therefore for the draft Local Plan to be effective and justified, in reflecting the evidence and assessment of the development management process, Annex 11 of the draft Local Plan

should be updated to confirm that tall buildings are appropriate on parts of the Policy PN2 Site 10 at 8 Albert Embankment and land to the rear.

11. Identification of Policy PN2 Site 10 as an appropriate location of tall buildings would be consistent with both the Vauxhall SPD and the VNEB OAPF, as highlighted in the Mayor of London's Stage 2 comments that recognise the potential for taller buildings in the location of Site 10 and more generally along Albert Embankment.
12. With respect to concerns from some that tall buildings cause alienation, e.g. in relation to daylight, overshadowing, mutual privacy, microclimate, wind deflection and turbulence, and impact at street level. These can all be addressed by sensitive design on a site by site basis and should not be reasons for resisting tall buildings. The focus should be on high quality design that optimises development
13. Without these amendments the local plan would not be positively prepared or effective.