

Examination of Draft Revised Lambeth Local Plan 2020 - 2035

Matter 9 – Places and Neighbourhoods

**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 9: Places and Neighbourhoods

Are the following policies positively prepared, justified, effective and consistent with national policy?

9.2 Policy PN2 (Vauxhall): including Site 10 (Albert Embankment and land to the rear bounded by Lambeth High Street, the railway viaduct and Southbank House, SE11) ...

3. There is a resolution from the Council to approve a planning application (reference 19/01304/FUL) on Policy PN2 Site 10 for a mixed use development including residential, employment, a replacement fire station, fire brigade museum, hotel, retail units, gym, offices and other business floorspace. This includes tall buildings of up to 26 storeys in height.
4. The application has also a positive Stage 2 response from the Mayor of London.
5. In the LFC's statements to Matter 4 (Economic Development) and Matter 8 (Quality of the Built Environment), it is explained why for the draft Local Plan to be sound it must (i) remove the KIBA designation from the part of Policy PN2 Site 10 it covers and (ii) include the location of Policy PN2 Site 10 as appropriate for tall buildings in Annex 11.
6. The justification for these changes include the assessment and consideration of planning application 19/01304/FUL that:

"a mixed-use approach blending residential and employment on all three sites [together comprising Policy PN2 Site 10] delivers more varied job opportunities, more housing, an enhanced public realm and significant heritage benefits when compared

with an alternative scheme for employment only within the KIBA." (Officers' Report, Executive Summary); and

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."
(Officers' Report, Executive Summary)

7. Therefore, for Policy PN2 Site 10 to be consistent with the changes required for the KIBA and tall building policies of the draft Local Plan, it should be modified as follows:

Ownership – update site ownership to London Fire Commissioner (LFC) to reflect the abolishment of the London Fire and Emergency Planning Authority;

Current use – update to confirm that The Workshop is permitted for temporary D1/B1 uses after which the use will revert back to sui generis;

Planning history – update to refer to Council's resolution to grant planning permission for application reference 19/01304/FUL, as well as listed building consent under application 19/01305/LB;

Preferred use – update to (a) align with removal of the site from the revised Southbank House and Newport Street KIBA and (b) reflect the principle of residential use of the site as part of a mixed use scheme including a London Fire Brigade Museum, hotel and employment floorspace;

Design principles and key considerations – (iv) update to note that the workshop site is suited to well-designed buildings of up to 90m (in accordance with the VNEB OAF and the Council's resolution to grant planning permission and positive Stage 2 response of the Mayor of London); and (xi) that the whole site is suitable for mixed use development that will provide greater public benefits than a more limited approach to maximise space for small and medium size enterprises.

8. For clarity, these changes to Policy PN2 Site 10 are expressed below as tracked changes:

Site 10 – 8 Albert Embankment and land to the rear bounded by Lambeth High Street, Whitgift Street, the railway viaduct and Southbank House SE11

Site area	The site comprises 8 Albert Embankment (0.52 ha) and the vacant workshop fronting Lambeth High Street (0.68 ha). Total site area 1.2 ha
Ward	Princes
Ownership	The London Fire and Emergency Planning Authority (LFEPA)-London Fire Commissioner (LFC)
Current use	Part operational fire station, part vacant former head-quarters building, officer accommodation and vacant vehicle workshop 'The Workshop Building' (currently in temporary use as display and events space and offices/workspace, after which the use will revert back to sui generis) and storage. The workshop building fronting Lambeth High Street is within the Southbank House/Newport Street Key Industrial and Business Area (KIBA).
Transport	Public transport accessibility level 6a (exceptional)
Flood zone	Flood zone 3: a site-specific flood risk assessment has been carried out as part of the strategic flood risk assessment
Heritage	Grade II listed building and Grade II listed drill tower and obelisk within the curtilage of the site Within Albert Embankment conservation area Local view (see Policy Q25 (b)(2)(xvi)) Grade II listed Southbank House, Black Prince Road adjoins the site Within an archaeological priority area Within the 'background areas' of strategic views from Primrose Hill to the Palace of Westminster and from Parliament Hill to the Palace of Westminster
How the site was identified and relevant planning history	<ul style="list-style-type: none"> • Identified in the Vauxhall Area SPD 2013 and the London Plan • Vauxhall Nine Elms Battersea Opportunity Area Planning Framework. • Identified in the GLA SHLAA 2009 list of large sites. • 10/00318/FUL (withdrawn) • 10/04473/FUL 10/04427/LB 10/04476/CON (refused February 2012) • Appeals against the above refusals dismissed in May 2013 • 19/04626/FUL change of use from Workshop (Use Class Sui Generis) to a display and events space and offices/workspace approved to 30.09.2024. Earlier planning permissions for temporary change of use of the workshop building have expired • 19/01304/FUL & 19/01305/LB mixed use redevelopment of site – resolution for approval
Preferred use	Retention/provision of an operational fire station. Mix of uses including residential and employment. Exceptionally, configuration of the site to include some residential within the KIBA boundary may be considered, if it can be demonstrated that this is necessary to achieve an acceptable scheme in all other respects. The amount of replacement employment

	should be maximised and should include space for small and medium enterprises. Provision of a London Fire Brigade Museum will be encouraged
Design principles and key development considerations	<p>The site provides an opportunity to bring back into use these underused and vacant premises.</p> <p>The council will support development on this site that:</p> <ul style="list-style-type: none"> (i) provides a sympathetic reuse of the listed buildings without radical alteration or extension; (ii) respects the silhouette of the head-quarters building as viewed from across the river; (iii) retains the ventilation obelisk on site; (iv) relates in height and bulk to the adjacent townscape taking into account the height, massing and scale of neighbouring buildings and the historic built form of the area; the heritage sensitivity of the site makes it inappropriate for tall building development; provides tall buildings subject to those buildings being of high quality design and not having an adverse impact on protected views, heritage and neighbouring buildings; (v) ensures that 8 Albert Embankment continues to make a positive contribution to the townscape; (vi) makes sure both existing and new residential amenity is protected; (vii) focuses employment uses in and around the viaduct and Lambeth High Street; (viii) provides active frontages opposite the local centre on Black Prince Road and along Lambeth High Street; (ix) minimises does not provide ground-floor residential uses on any part of the site, any ground floor residential units must demonstrate acceptability from a flood risk perspective; (x) provides public realm improvements to Albert Embankment, Lambeth High Street, Black Prince Road and Whitgift Street, to reduce traffic dominance and promote walking and cycling; (xi) maximises the amount of replacement employment and includes space for small and medium enterprises; (xii) provides a mixed and balanced community with an acceptable mix, tenure split/distribution of residential accommodation; (xiii) allows for the potential to connect to a future district-wide combined heat and power network.

9. These changes to Policy PN2 Site 10 are also required for the draft Local Plan to be consistent with the National Planning Policy Framework (as well as the Vauxhall, Nine Elms & Battersea Opportunity Framework, and Vauxhall SPD) in encouraging multiple benefits from urban land through mixed use schemes (NPPF paragraph 118), and so that the Local Plan is positively prepared and effective.