

WANDSWORTH BOROUGH COUNCIL

PLANNING APPLICATIONS COMMITTEE – 16TH SEPTEMBER 2009

Details of applications for permission to develop on land on south side of Nine Elms Lane including Ponton Road, SW8 together with the Borough Planner’s recommendation on each proposal.

<u>Ref.</u>	<u>Address</u>	<u>Proposal</u>
2009/1506 2009/1507 05 May 2009	Land on south side of Nine Elms Lane incorporating Ponton Road, SW8	A) Redevelopment of an area of 2.15 hectares to provide a new United States Embassy, to a maximum possible height of 97m, associated buildings, and new access road from Nine Elms Lane. (Outline application) B) Formation of new junctions and new road to replace Ponton Road, to be located between Nine Elms Lane and Post Office Way, and associated alterations to Nine Elms Lane.
MH	Queenstown	

List of abbreviations used in this report

ADF: Average Daylight Factor
AOD: Above Ordnance Datum (Sea Level)
AQMA: Air Quality Management Area
ASPH: Annual Sunlight Probable Hours
AVR: Accurately Verified Representations.
BRE: Building Research Establishment
BREEAM: Building Research Establishment Environmental Assessment Method
CABE: The Commission for Architecture and the Built Environment
CAZ: Central Activities Zone.
CCHP: Combined Cooling, Heating and Power
CHP: Combined Heat and Power
CCS: Considerate Constructor Scheme
CMS: Construction Method Statement
CPZ: Controlled Parking Zone
EA: Environment Agency
EDO: Economic Development Officer
EH: English Heritage
EIA: Environmental Impact Assessment
EMI: Electro Magnetic Interference

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EMP: Environmental Management Plan
ES: Environmental Statement
FRA: Flood Risk Assessment
GEA: Gross External Area
GSHP: Ground Source Heat Pump
GIA: Gross Internal Area
GLA: Greater London Authority
HES: Head of Environmental Services
HGV: Heavy Goods Vehicle
LDF: Local Development Framework
LGV: Light Goods Vehicle
LBW: London Borough of Wandsworth Council
LEED: Leadership in Energy and Environmental Design
LPA: Local Planning Authority
LVMF: London Views Management Framework
MGV: Medium Goods Vehicle
NSC: No Sky Contour
OAPF: Opportunity Area Planning Framework.
PTAL: Public Transport Accessibility Levels
PV's: Photovoltaics
QRA: Quantified Risk Assessment
Section 106: Section 106 of the Town and Country Planning Act 1990.
SPG: Supplementary Planning Guidance
SUDS: Sustainable Urban Drainage System
TA: Transport Assessment
TfL: Transport for London
TPC: Travel Plan Co-ordinator
UDP: Unitary Development Plan
VSC: Vertical Sky Component
ZoI: Zone of Influence

SITE: A) 2.15 hectare site of irregular shape, fronted by Nine Elms Lane to the N. with the present Ponton Road passing through the site on a N/S alignment, with the River Thames running 50m to the N and the Vauxhall-Clapham Junction railway viaduct 100m to the S. The Vauxhall transport interchange is some 600m to the NE.

B) Site of 1.29 ha for the new road to replace the existing Ponton Road, running S from Nine Elms Lane to the west and south of the site and including an element of Nine Elms Lane running to the N. of the site.

The site currently comprises 6 one and two-storey buildings, The South Bank Business Centre buildings are to the E. of the existing Ponton Road comprising 4 buildings in a variety of business uses, with a car showroom and service centre to the N. and a fine art storage facility to the S. on the W. side of Ponton Road. Part of the

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site of the new Ponton Road is on land occupied by the vacant six-storey Stationery Office building to the W of the main Embassy site.

To the S of Nine Elms Lane, W of the Embassy site and E of the new Ponton Road would be an area of land of some 4,000 sqm, which is excluded from either planning application, but surrounded by both. No details are given as to how or when this piece of land would be developed.

To the NE of the site is the extensive site of the New Covent Garden Flower Market, with the part single/ part two-storey DHL distribution depot to the SE. To the S are further storage and distribution buildings. Further to the W. is the Royal Mail South London Mail Centre, and beyond the railway viaduct to the S. and SW. is the New Covent Garden Market complex. Across Nine Elms Lane to the N. is Elm Quay, a 34m high, ten-storey residential building, with Riverside Court, a 24m high seven-storey building to the NE.

Middle Wharf and Prescott Wharf fronts the River Thames 80 m to the NW of the site. Bourne Valley Wharf, which is disused, and is not safeguarded, fronts the River to the N. of the site, E of Elm Quay.

The site is identified in the Core Strategy as being within the Nine Elms Opportunity Area, as well as an Archaeological Priority Area, and is identified in the London Plan as being within Vauxhall Battersea Nine Elms Opportunity Area of the Central Activities Zone (CAZ). The site lies within a high flood risk zone (3). The site has a Public Transport Accessibility Level of 4 (where 1 is the least, and 6 the most accessible). The nearest conservation area is St. George's Square, across the River Thames to the N in Westminster facing the site.

HISTORY: South Bank Business Centre, 1 Ponton Road; No relevant history subsequent to construction and expansion in 1970's.

Car showroom and premises, Units 2-4 Ponton Road, 1992; p.p. Use of the building as a car workshop and showroom (with external display area). No relevant subsequent history.

Warehouse, offices and premises, Units 6-12 Ponton Road; 1980 p.p. erection of light industrial and warehousing buildings. No relevant subsequent history.

DETAILS: A). An outline planning application is submitted for redevelopment of an area of land of 2.15 hectares to provide a new Embassy building for the United States of America, with three associated pavilion buildings, with all matters reserved for further consideration with the exception of access. The detailed design of the building is subject to a design competition, which is taking place at present, with 4 U.S. architectural practices having been shortlisted. A number of parameter plans have been submitted with the application, which show the minimum and maximum design

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envelopes of the Embassy and Pavilion Buildings. No detailed elevations or floor plans are therefore provided at this stage. Plans have also been submitted which identify the vehicular access points into the site, as well as indications of the pedestrian access points, and indications of the site layout.

The main Embassy building would provide between 40,477 sqm of Gross Internal Area (GIA) and 51,350 sqm GIA. Drawings have been submitted showing a maximum design envelope, which would have a maximum possible height of 97.2m along a N/S central spine and a minimum design envelope rising to 56m A.O.D. The applicants anticipate that the building will take up approximately 40% of the maximum design envelope, with the height to be in the region of fifteen to twenty-storeys. The building would be in the centre of the site, with its maximum footprint defined by the requirement for a 30m setback between any face of the building and the property boundary as one of its main design parameters. The irregular footprint of the building would have a maximum length of 93.5m (N-S) and a maximum width of 101m (E-W). The Embassy building is proposed to include public and representational spaces, a consular section, diplomatic and governmental agency departments, embassy business and employee support and recreational and social areas. A warehouse, maintenance workshop and residence quarters for a detachment of U.S. Marines are also proposed. In addition to 800 employees it is estimated the Embassy would attract 1,100 visitors per day, comprising 700 visa appointments (100 per hour) and 400 American Citizen Services (ACS) appointments (57 per hour).

The area within the 30m security zone would be landscaped, with the design of such landscaping to be submitted as a reserve matter, although the Design Competition Winners would design this integrally with the building. The applicants have indicated that this security zone could display works of art within the landscaped setting. A security boundary will surround the site, which would have the functions of providing security against unauthorised traffic and ramming, and also to prevent unauthorised pedestrian access, and is likely to be between 2.75 and 4.2m in height. Details of this will also be reserved, and the Design Competition Winners would also design this integrally with the building.

Three smaller pavilion buildings are also proposed adjacent to the perimeter of the site to control separate access and security functions for the building, and would each have a maximum height of 5m. These comprise; P1, to the east of the Embassy which would be between 200 and 450 sqm and would be specifically an entrance for Ambassador, VIP's and staff for both vehicles and pedestrians, accessed by a new estate road internal to, and running along the NE boundary of the site. P2, to the east of the Embassy which would be between 77 and 300 sqm GIA and would be specifically an entrance for day to day visitors to the Embassy such as those obtaining Visas and other such regular functions, and would be a pedestrian only entrance. P3, to the south-west of the Embassy adjacent to the new Ponton Road, which would be between 200 and 600 sqm GIA and would provide an entrance for staff and servicing

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functions of the building for both vehicles and pedestrians. The location of these pavilions is not fixed for the purposes of this application, with locations proposed indicative at this stage.

Pedestrian access is proposed to pavilion P2, to the south of the building, via the new access road to the east of the site. The applicants have proposed a public piazza adjoining the southern boundary of the site, to complement the pedestrian access point to pavilion P2, although this piazza is outside the 'red line' site boundary.

On-site operational parking is proposed within a basement level, with space proposed for 131 cars, with access through P2. These spaces would comprise 7 spaces for maintenance vehicles, 29 spaces for day passes for visiting staff allocated on a permit basis, and 95 spaces occupied by a fleet of official cars operated by the Embassy, with designated drivers with security clearance used for meetings during business hours when required. 4% of the spaces would be reserved for people with disabilities.

The applicants are proposing to provide 8 cycle parking spaces for visitors to the site, which would be provided outside the Embassy compound, adjacent to the S. boundary, within the application site B), along with a hire station with space for 12 cycles for the Mayor's Cycle Hire Scheme. 52 cycle parking spaces for staff would be provided within the basement parking area.

Taxi parking is proposed adjacent to the new Ponton Road to the S of the proposed Embassy.

B). Is a full planning application for the provision of a new Ponton Road of some 200m length running from Nine Elms Lane (where a new signal controlled junction would be provided), to the W. of its present alignment, linking with Post Office Way (which is a private road), and joining the existing Ponton Road to the S. of the Embassy site. The new road would replace the existing Ponton Road, which would become part of the application site for the Embassy building. An 11m wide vehicular roadway would be provided, with pedestrian footways on either side and would provide vehicular access to the Embassy via pavilion P3, as well as the main access to the South London Mail Centre via Post Office Way and other premises to the south on Ponton Way. The new road is proposed to be completed and open for use prior to the closure of the existing Ponton Road, and therefore before any construction work can begin on the new Embassy planned for 2012.

The application also involves improvement to, and widening of a 400m stretch of Nine Elms Lane which fronts the proposed Embassy site, including a new secondary access at the eastern end of the Embassy development. This secondary access would be an arm of some 25m, which would then join with the main application site boundary. The applicants are proposing to provide a replacement access to Elm Quay Court to replace that lost by the removal of the existing Ponton Road, with which it shares controlled signals at present, with the replacement incorporated into the

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proposed new junction but with signals triggered by vehicles entering and leaving the building only. The application boundaries for A) the Embassy and B) the new road abut one another with the exception of the triangular piece of land to the S of Nine Elms Lane, W of the Embassy site and E of the new Ponton Road, which would be retained in the ownership of Ballymore.

The existing sewer under Ponton Road would need to be abandoned and a new sewer to be constructed under the new highway between Post Office Way and Nine Elms Lane, which will need to be acceptable to Thames Water for adoption.

Amendments/Additional Information

Subsequent to the original submission of the planning application, the applicants have submitted further information in respect of the following:-

- 1) Additional information provided in respect of security and assessment of incidents at present Embassy in recent years.
- 2) Amendments to design of proposed Ponton Road junction with Nine Elms Lane in respect of an increase to flares and increase of lane widths to 4.4m.
- 3) Changes to Elm Quay Court access to provide signal controls triggered by vehicle movements.
- 4) Agreement to an informative that the positions of the pavilions are not fixed.
- 5) Removal of signalisation from the E (Ambassadors) access road.

Section 106 Agreement:

A) A draft Section 106 Agreement Heads of Terms in respect of the main Embassy application would cover:-

1. A contribution to transport improvements in the area including; Crossrail or other strategic transport intervention/Northern Line extension
2. A contribution to local transport improvements Increased demand for bus trips between Vauxhall and Nine Elms; impact of increased demand on Vauxhall rail station; increased demand for tube services to and from Vauxhall underground station, increased taxi demand; alterations to CPZ; increased pedestrian flows from Vauxhall to Nine Elms; improvements to Thames Path; promoting cycling/cycle hire and a Travel Plan.
3. Contributions to the Mayor's Cycle Hire scheme
4. Environmental improvements to Nine Elms Lane
5. Delivery of Plaza, of a minimum of 1,250 sqm in area, to adjoin the SE boundary of the site.
6. Linear Park and pedestrian/cycle link/access road between Nine Elms Lane and Wandsworth Road contributions.
7. Local Employment Agreement.
8. Enhancement of open space fronting River Thames to E. of Elm Quay and adjoining Riverside Walk.
9. Commitment to achieving a 30% carbon reduction.

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10. Commitment to further work regarding heating and cooling, and link to district network.
11. Targets for CO2 savings from renewable technologies.
12. Design Review Panel
13. Public Art Installation
14. Applicants commitment to using endeavours to resolve the concerns of RMG.

B) For the new road application S106 Agreement Heads of Terms (including agreements under Sections 38 and 278 of the Highways Act as necessary) would cover;

1. Improvements and alterations to Nine Elms Lane including the installation and alterations to the traffic signal arrangements at the existing and proposed junctions and any alterations to the utility services
2. Stopping up and diversion of Ponton Road
3. Applicant to meet the cost of constructing the new Ponton Road to a design approved by this Council. Design to be fully safety audited. Dedicate the new highway and the Council to adopt it as a public highway and to meet the cost of relaying the footway along the frontages of the development and secondary access.
4. Inspection fees (7%).

Environmental Statement: The applicants have submitted an Environmental Statement (ES) under the Town and Country Planning (Environmental Assessment) (England and Wales) Regulations 1999. The ES is submitted in relation to the outline planning application for the Embassy (2009/1506); the planning application for the road (2009/1507) is not required to be accompanied by an ES, although as the two applications are intrinsically linked, consideration is given to any potential effect of the road reconfiguration cumulative with the Embassy development.

The documents submitted comprise the main text of the Environmental Statement as well as a Townscape, Visual and Built Heritage Assessment as a separate volume together with appendices, a non-technical summary and supporting documents.

The Environmental Statement describes the likely significant environmental effects of the development during construction and following its completion. Where significant adverse effects are identified, the ES sets out methods to prevent, reduce or offset these effects, which are collectively known as mitigation measures.

The ES sets out the methodology for undertaking the EIA, describes the existing land uses, the site selection process and design process, the proposed development and goes on to assess the following broad area:

- Development Programme and Construction.
- Socio-economics
- Transportation and Access
- Air Quality.
- Noise and Vibration.

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- Archaeology.
- Ground Conditions and Contaminants.
- Water Resources and Flood Risk
- Ecology.
- Wind
- Sunlight, Daylight and Overshadowing.
- Telecommunications.
- Townscape, Visual and Built Heritage Assessment.
- Cumulative Effects

A summary of the Environmental Statement can be seen in Appendix 1. In conclusion, the applicant's Environmental Statement has been assessed by officers to ensure it meets the EIA Regulations 1999 and whether it contains sufficient information to determine whether or not planning permission should be granted, and the planning conditions/obligations that need to be attached to a permission.

The Environmental Statement including the further information is considered to meet the EIA Regulations and provide satisfactory levels of information in order for a proper assessment to have been undertaken of the environmental effects of the development proposals. The details in the ES are considered to be sufficiently comprehensive to provide a robust EIA and allow for a comprehensive assessment of the environmental impacts of the proposed development.

CONSULTATION: A) Site and Press Notices. 3000 neighbours letters delivered, 31 neighbour letters of objection,

Loss of residential amenity and visual impact:- Residents in Elm Quay will be directly affected by loss of outlook as upper bedrooms overlook Nine Elms Lane with uninterrupted views of Crystal Palace, Sydenham Hill and of skyline, as existing Jack Barclay Building is only one storey high; loss of privacy; neighbours would be completely overlooked; the proposal would result in loss of view; overshadowing of neighbours building; loss of amenity for occupiers of Millennium House, Belvedere House, Elm Quay, the proposal would be three times the size of Elm Quay ; at 97m high the build would block view and sunlight from the south throughout almost all the day; lead to increase in noise pollution; result in enormous detrimental effect on the homes. Proposed building would look down on neighbouring buildings and not be in keeping with surrounding buildings; the height of the building would be unreasonable and would dwarf all neighbouring buildings; be totally out of scale with the locality with the mass of the structure too great. The proposal would affect strategic and local views, lack of architectural coherence, the proposal would fail to enhance riverside views; will compete with the iconic power station; interfere with many sightlines; offer unwelcome disfigurement to the skyline opposite Pimlico and especially St. George's Square.

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Transport issues:-The proposal does not account for residents entering and leaving Elm Quay without causing an accident; lack of transport facilities; likely that a high proportion of visitors will be by car particularly during rush hour; construction would require high amount of site traffic and delivery of materials and would be detrimental to the traffic flows; the proposed parking provision (131) will be inadequate. Fire engines and ambulances would not be able to gain uninterrupted access to Elm Quay. Traffic impacts are unacceptable; loss of unrestricted parking along Ponton Road.

Security issues:-Would present a security risk; site could be possible location point for demonstrations and could affect up to 200 people per day including children during school run; London residents should not be placed under unnecessary risk by the location of the US Embassy being close to the river; to construct such a prominent target so close to what is already regarded as a weak spot seems extremely irresponsible. The Embassy would require security walls/fencing, which by its nature will be unsightly; potential telecommunications blackspot due to security issues.

Other issues:-Conflict with local and government policies; contribution to local economy and employment would be minimum; the proposal would result in loss of small, efficient, essential businesses; no necessity for building to maximise density; concern over the impact of raised levels of water table; the prolonged period of development will cause significant noise and dirt pollution to Elm Quay Court; enormous disruption arising from the reconfiguration of Nine Elms Lane and Ponton Road; lead to reduction of capital values of neighbouring properties; increase in insurance costs; hours of operation sits ill within a mixed use residential area; drawings are misleading.

4 letters of support. The proposal is a great idea and will help to keep Wandsworth in the London picture and greatly improve the status and condition of the area, will add to the profile of the river on the south; Nine Elms Lane is sadly in desperate need of a proposal of this type to continue the much needed regeneration of the area; such a landmark development will kick start other nearby high quality and sustainable development with further support facilities and amenities; scale of proposed scheme is brave and bold; needs to be substantial to provide the landmark that is required; will not over-impose given the size of Battersea Power Station and the pending St George tower; the proposal will revitalise the much neglected river frontage; real opportunity for a building design by world class architect to put the area on the map.

B) Site and Press Notices. 213 neighbour letters, 30 individual letters of objection, 1 objection from Royal Mail Group, letter from Riverside Maintenance Ltd

The proposed new junction ignores vehicular access into Elm Quay Court and denies pedestrian access to cross Nine Elms Lane; no account has been taken of the vehicle access needs of the residents; removal of traffic lights would lead to increased collisions; there have been two people killed outside of Elm Quay Court, one neighbour hit by speeding traffic roaring down one of the busiest roads in London;

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removal of lights at the current junction of Ponton Road and Nine Elms Lane will make access to Elm Quay Court travelling south almost impossible. The proposal will make it virtually impossible and highly dangerous to exit Elm Quay Court into Nine Elms Lane by turning right to head west. Nine Elms Lane has continuous traffic heading west which is only broken by existing traffic lights which enables this right turn; proposed traffic lights will be rarely used and pedestrian traffic will not give the breaks in traffic as suggested. Exceedingly difficult and dangerous to turn left into Elm Quay Court from Nine Elms Lane. The proposal would extend the bus lane up to the entrance of the Court and require east bound traffic wishing to enter Elm Quay Court to cut across existing bus lane without any turning or slipping distance, blocking traffic and dodging past fast moving traffic. The proposal will make it exceedingly dangerous to turn right from Nine Elms Lane into Elm Quay Court; residents will have to dodge fast following traffic when leaving and turning into Elm Quay Court. This is an accident waiting to happen; the proposal will make it virtually impossible and highly dangerous to exit Elm Quay Court into Nine Elms Lane by turning left to head east. Existing vehicles will either have to either wait in the box junction or dodge across the bus lane and with removal of lights nothing to create window gap.

The proposal would result in loss of valuable free parking in Ponton Road and new road will be restricted because of security issues; significant increase in amount of traffic using this junction; detrimental to the local residents environment; increasing traffic and junction noise; Junction should be moved further to the west; stop and start traffic noise and concentration of vehicle exhaust will be much closer to habitants in Elm Quay Court and give rise to loss of residential amenity in that respect.

The proposal should include sound reduction paving on the road surface for at least 50m in either direction; some form of passive sound barrier ie high wall for Court to minimise sounds or a reduction in speed limit this point; controlled traffic lights to Embassy during working hours; pedestrian crossing with light change request buttons; relocation of royal mail post box to enable residents to have somewhere to post.

Royal Mail Group - objection: Royal Mail Group (RMG) are a 24 hour nationally significant mail facility located south of Nine Elms Lane serving south London region as well as the area of Westminster, SE and SW postcodes; over riding concern is to safeguard the operation continuity and security of the Mail Centre. Provided that this concern is fully and properly addressed there would be no objection; serious reservations about the applicant's transport assessment. The assessment of traffic generation is predicted upon journey to work which is contrary to best practice guidance; staff working at the development are likely to travel by car due to difficulties using public transport at Nine Elms Lane, not accounted for by transport assessment. In the absence of survey data the transport assessment should be supported with a more robust assessment. The assessment of visitor trips is not accepted and the assessments conclusion that only 5% of visitors will travel by car is uncorroborated by reference data and likely to represent a significant under-estimate;

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travel plan cannot be properly monitored as staff arrangements are confidential; assumptions of the number of trips under taken during peak periods represents unduly optimistic assumption; a condition should be included to restrict use of car parking spaces outside peak hours; a total of 1500 vehicles enter the Mail Centre per day via Post Office way around 550 comprise of articulated vehicles, yet geometry of the junction appears very tight; concern that there is insufficient room within the Junction to accommodate operational vehicles waiting to access and egress the mail centre; no assumption is made regarding any trip generation arising out of any future development of the residual area; the design of the junction makes provision for only 3 specified developments including the Power Station and no allowance is made for other emerging developments which would increase traffic flows on Nine Elms Lane ; no modelling has been carried out in respect of the proposed secondary access so cannot assess whether junction will operate effectively; given the isolated location of the development a much higher proportion of staff and visitor movement is likely to involve taxis; congestion on Ponton Road raises serious risk of disruption and future use of Centre particularly by drop off point. Likelihood that development would be target for public demonstrations/protests which could result in closure of Nine Elms Lane or Ponton Road; development must incorporate a contingency to preserve uninterrupted use of Mail Centre and possibly consider redeveloping alternative route out on to Nine Elms Lane; concern that no mitigation measures incurred by neighbours to enhance security of neighbouring premises has been put forward and is both necessary and reasonable.

Further letter stating that previous holding objection should now be considered as a formal objection, given ongoing discussions with applicants have not been resolved. Consider that it would be premature for Council to determine the application at 16th September PAC, or if it does then p.p. should be refused for reasons given in previous correspondence.

Chairman of Riverside Maintenance Ltd (Representing the Riverside Court Residents)
If the intention is to link the Nine Elms Lane to Wandsworth Road and open this up to all categories of traffic it would be seen by many drivers as a convenient route to avoid Vauxhall gyratory system and certainly generate more than limited number of daily movements envisaged by the private road concept. Neighbours therefore concerned at probable increase in volume of traffic on Nine Elms Lane if the through road is not strictly a private access road to the Embassy.

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Mayor of London (Greater London Authority):- Stage 1 Report. The site is located in the Central Activities Zone (CAZ) and in the Vauxhall- Nine-Elms Battersea Opportunity Area. London Plan policies 2A.4, 3B.3, 5G.2 and 5G.3 set out the strategic objectives for the CAZ. Strategic priorities for CAZ include providing competitive, integrated, varied, global business location through development and redevelopment in CAZ opportunity areas, and provision of mixed uses as part of new developments. Wandsworth Core Strategy identifies Nine Elms Lane area for mixed-use development.

London Plan policy 5E.2 Opportunity Areas in South West London states that new developments in opportunity areas will be expected to maximise densities and contain mix uses. The opportunity area has indicated a capacity of 8,000 new jobs in period 2001-2026. Production of OAPF is currently underway. A development capacity study as part of the first draft of OAPF has identified a higher threshold of 27,000 jobs subject to public transport infrastructure being delivered. The Embassy scheme would be the first major scheme to be submitted in Nine Elms since work began on OAPF.

The Embassy would be classed as Sui Generis for land use planning purposes, but in practice the proposal would provide a significant amount of floorspace (between 40,000 to 50,000 sqm) providing around 800 jobs; other uses of building will include public and representative areas, residence quarters and servicing areas.

London Plan 3B.3 and 5G.3 state that within CAZ where increase of office floorspace is proposed there should be a mix of uses including housing unless such a mix would demonstrably conflict with other policies in the plan. Given the high profile and prestigious nature of the Embassy, it will raise the profile of and enhance the attractiveness of the Nine Elms area, it is likely to increase demand for hotel and retail services and act as a catalyst for further investment. The land use strategy of the OAPF supports high density mixed use intensification; as the first major non-residential development in the OA and in view of the strategic regenerative benefits of the embassy, it is not considered appropriate to seek housing provision as part of this proposal. More important is the need for public transport and public realm improvements and the need to secure planning obligations towards these outweighs the need for a housing contribution.

Urban design and inclusive access: Good design is central to all objectives of the London Plan. Chapter 4B addresses both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles including maximise the potential of sites, tall and large buildings, built heritage views and Blue Ribbon network. Policies 4B.9 and 4B.10 which relate specifically to tall and large scale buildings (defined as taller than their surroundings and/or have a significant impact on the skyline and larger than the threshold sizes set for the referral of planning applications to the Mayor) are of particular relevance.

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Outline applications for tall buildings are normally discouraged because of material issues, a view shared by CABI and English Heritage in their guidance on Tall Buildings (2007). The Mayor must be satisfied that the parameters and principles established within design and access statement will result in excellent urban design and architecture. In this instance by virtue of international architectural design competition with the winning design to proceed to submission of reserved matters the principle of outline application for a tall building is accepted and welcomed under London Plan 4B.2. It is suggested that in determining future reserved matters a design panel consisting of officers from LBW, GLA, CABI and EH be set up to allow input at the design stage and be set up through the 106 agreement.

Illustrative layout plans suggest main public interface of the Embassy and the dominant flow of pedestrian and vehicle traffic will be towards south of the site, with aspiration to create new public plaza adjacent to the southern boundary, of the site. Whilst welcomed, the plaza is shown outside the red line boundary its delivery is not in the applicants control and therefore is uncertain. As a matter of principle tall buildings should contribute to the public realm and facilities and interact positively with their surroundings at street level. A solution would be to realign the southern part of the proposed boundary enclosure further north, thereby enabling all parts of the public plaza to be delivered within the red boundary line. To maintain the 30m security zone, a reduction in the maximum footprint of the building would be necessary and thus reduce the size of the overall maximum of the building envelope. The relationship between the new Embassy building and Nine Elms Lane is also of concern. The new building will turn its back on Nine Elms Lane with no visible entrance or activity from the northern side of the site. In short to medium term, Nine Elms Lane is likely to function as the primary route to the site. A principle aim of OAPF is to improve Nine Elms Lane through activity edges to this key strategic route. It is suggested that pavilion 3 is moved to north to create a visual marker and gateway. The proposed earth bund between Nine Elms Lane and the Embassy building undermines the relationship between the landscape setting of the building and the open aspect of the River Thames. While security is paramount the opening up of the northern façade of the building would provide a visual connection and sense of activity between the building and the street, albeit separated by a security fence. The location of the boundary enclosure and entrance pavilion will need to be more defined. The draft OAPF also includes a new pedestrian and cycle link along the alignment of the existing Ponton Road connecting Nine Elms Lane to Wandsworth Road. The delivery of this route is considered essential to improving permeability. A consequence of the irregular shape of the application site and the alignment of the new road is a left over triangular piece of land fronting Nine Elms Lane on the west side of the Embassy site. The development potential of this site will potentially be compromised by its shape and size and proximity to the Embassy and would be better incorporated into the site.

The level of detail provided in the design and access statement is insufficient to demonstrate compliance with London Plan policy 4B.5 (creating an inclusive

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environment). The applicant should explain how the principles of inclusive design, including specific needs for disabled people will be fully integrated and implemented in the reserved matters application.

Strategic views: London Plan policies 4B.16 to 4B.18 provide the policy framework for the management of strategically important views. Also relevant is policy 4B.9, which states that tall buildings should be acceptable in terms of design and impact on surroundings. The London View Management Framework (LVMF) Supplementary Planning Guidance provides further guidance on the implementation of these policies and assessment of the impact of new developments on designated views. The applicant has submitted a townscape, visual, built heritage assessment, which assesses the impact on the development on strategic views in the LVMF as well as a series of middle distance and local views. In absence of detailed design its precise appearance and detailed effect cannot be assessed. The applicant is expected to undertake a more detailed assessment upon submission of a reserved matters application.

The LVMF river prospects from Hungerford Bridge, Waterloo Bridge and Albert Embankment are identified as being affected by the proposed development. The strategic importance in all these views are the Palace of Westminster and the towers of Westminster Abbey. From the south end of Hungerford Bridge the majority of development would be obscured; the upper most section (above 80m) would potentially appear as a new addition to the skyline to the right of existing Millbank Tower (Grade II Listed) and to far left of Palace of Westminster. From the northern end of Hungerford Bridge the development would be obscured by the Palace of Westminster. From the southern end of Waterloo Bridge the development would be obscured by Millbank Tower. In view from the northern end of Waterloo Bridge the majority of the development would be obscured by Thames House and residential Panoramic Tower behind. The upper most section of the building would be visible to the right of the Millbank Tower above the roofline of Thames House, which is already punctuated by Panoramic Tower. Draft LVMF guidance states that buildings visible to the right of Millbank Tower should not detract from the dominance of the Palace of Westminster. The proposed development would read as an extension to the Panoramic Tower and therefore the ability of the viewer to recognise and appreciate the Palace of Westminster as the strategically important landmark in the view would be maintained. Additional points north of LVMF points on Waterloo Bridge were assessed and GLA satisfied that the development will not prejudice the Mayor's intention to protect the silhouette of the Palace of Westminster.

In the river prospect view from Albert Embankment on to Westminster Bridge the northern elevation of the proposed development would be partially visible to the immediate left of Millbank Tower on the north back of the river. The incursion would read as an extension to the river front and is sympathetic to scale to Thames House to the right of Millbank Tower. The protruding element would decrease the gap in the view between St. George Wharf and Millbank Tower. This gap has already been breached by the consented Vauxhall Tower and is sufficiently maintained so as to

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preserve the setting of the Listed building. The Palace of Westminster will remain dominant landmark directly across the river in the centre of the view. The proposed development will not be visible behind the silhouette of the Palace of Westminster in line with draft LVMF and where the proposed development could be partially visible, its impact is considered acceptable in line with LVMF guidance and London Plan policy 4B.17.

Climate change: The London Plan climate change policies set out in chapter 4A collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions. The policies set out the ways in which developments must address mitigation of and adaptation to the effects of climate change (Policy 4A.1) through use of passive design, energy, efficiency and renewable energy measures.

Baseline carbon dioxide emissions: At detailed design stage a more robust assessment of the developments baseline carbon emissions should be undertaken using building regulations approved modelling software, the results should be compared with the minimum building regulations requirements. This should be secured through the section 106 agreement.

Energy efficiency: In line with London Policy 4A.3 the applicant aims for high standards of energy efficiency to achieve BREEAM excellent. Further information is needed to understand how the proposed measures would deliver 30% of savings. The applicant should estimate the carbon reductions expected to be achieved and this further information should be secured in section 106 agreement.

Heating and cooling: The proposal includes a combined heat and power (CHP) plant with a capacity of 125kWe and 165kWth. The applicant has estimated that the CHP will achieve a further 50% carbon savings above and beyond energy efficiency measures. Further information would be required to demonstrate this target. The applicant should ensure that no minimal heat is rejected by CHP. The emerging Vauxhall-Nine Elms Battersea (VNEB) opportunity strategy sets out a masterplan for implementation of a low carbon district heating network in the area. In the event that the district heat network is available at the time of construction it would be preferable to connect from the outset. To be secured in the 106 agreement. The proposal includes investigating cooling towers and free cooling at night to minimise energy requirements. Ground source cooling is proposed. Further work to determine the feasibility of these technologies should be secured in the section 106 agreement.

Renewable energy: London Plan Policy 4A.7 adopts a presumption that all developments will achieve a reduction in carbon dioxide emissions of 20% from on site renewable energy unless it can be demonstrated that such provision is not feasible. The applicant has undertaken to explore three renewable energy technologies; wind turbines, photovoltaic panels and ground source cooling. A target