

## Planning Committee

Monday 20 July 2020  
2.00 pm

Online/Virtual: Members of the public are welcome to attend the meeting.  
Please contact [Constitutional.Team@southwark.gov.uk](mailto:Constitutional.Team@southwark.gov.uk) for a link or  
telephone dial-in instructions to join the online meeting

### Membership

Councillor Martin Seaton (Chair)  
Councillor Kath Whittam (Vice-Chair)  
Councillor Barrie Hargrove  
Councillor Adele Morris  
Councillor Margy Newens  
Councillor Damian O'Brien  
Councillor Catherine Rose  
Councillor Cleo Soanes

### Reserves

Councillor Eleanor Kerlake  
Councillor Sarah King  
Councillor Richard Livingstone  
Councillor James McAsh  
Councillor Hamish McCallum  
Councillor Darren Merrill  
Councillor Jason Ochere  
Councillor Jane Salmon

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### INFORMATION FOR MEMBERS OF THE PUBLIC

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#### Access to information

You have the right to request to inspect copies of minutes and reports on this agenda as well as the background documents used in the preparation of these reports.

#### Babysitting/Carers allowances

If you are a resident of the borough and have paid someone to look after your children, an elderly dependant or a dependant with disabilities so that you could attend this meeting, you may claim an allowance from the council. Please collect a claim form at the meeting.

#### Access

The council is committed to making its meetings accessible. Further details on building access, translation, provision of signers etc for this meeting are on the council's web site: [www.southwark.gov.uk](http://www.southwark.gov.uk) or please contact the person below.

**Contact:** Gerald Gohler on 020 7525 7420 or email: [gerald.gohler@southwark.gov.uk](mailto:gerald.gohler@southwark.gov.uk)

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Members of the committee are summoned to attend this meeting

**Eleanor Kelly**  
Chief Executive  
Date: 3 July 2020



# Planning Committee

Monday 20 July 2020  
2.00 pm

Online/Virtual: Members of the public are welcome to attend the meeting. Please contact [Constitutional.Team@southwark.gov.uk](mailto:Constitutional.Team@southwark.gov.uk) for a link or telephone dial-in instructions to join the online meeting

## Order of Business

Item No.	Title	Page No.
1.	<b>APOLOGIES</b>	
	To receive any apologies for absence.	
2.	<b>CONFIRMATION OF VOTING MEMBERS</b>	
	A representative of each political group will confirm the voting members of the committee.	
3.	<b>NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT</b>	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	<b>DISCLOSURE OF INTERESTS AND DISPENSATIONS</b>	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	<b>MINUTES</b>	1 - 3
	To approve as a correct record the minutes of the open section of the meeting held on 15 June 2020 at 2pm.	
6.	<b>DEVELOPMENT MANAGEMENT</b>	4 - 7
	<b>6.1 33-38 RUSHWORTH STREET, LONDON, SE1 0RB 1-7 KING BENCH STREET SE1</b>	8 - 76

**Item No.**

**Title**

**Page No.**

**6.2 160 BLACKFRIARS ROAD LONDON SOUTHWARK**

77 - 198

**EXCLUSION OF PRESS AND PUBLIC**

The following motion should be moved, seconded and approved if the committee wishes to exclude the press and public to deal with reports revealing exempt information:

“That the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 1-7, Access to Information Procedure rules of the Constitution.”

Date: 3 July 2020

## Planning Committee

### Guidance on conduct of business for planning applications, enforcement cases and other planning proposals (virtual meetings)

**Please note:**

The council has made the following adaptations to the committee process to accommodate virtual meetings:

- The agenda will be published earlier than the statutory minimum of five working days before the meeting. We will aim to publish the agenda ten clear working days before the meeting.
- This will allow those wishing to present information at the committee to make further written submissions in advance of the meeting in order to:
  - Correct any factual information in the report
  - Confirm whether their views have been accurately reflected in the report
  - Re-emphasise the main points of their comments
  - Suggest conditions to be attached to any planning permission if granted.
- **Those wishing to speak at the meeting should notify the constitutional team at [Constitutional.Team@southwark.gov.uk](mailto:Constitutional.Team@southwark.gov.uk) in advance of the meeting by 5pm on the working day preceding the meeting.**

1. The reports are taken in the order of business on the agenda.
2. The officers present the report and recommendations and answer points raised by members of the committee.
3. The role of members of the planning committee is to make planning decisions openly, impartially, with sound judgement and for justifiable reasons in accordance with the statutory planning framework.
4. The following may address the committee (if they are present in the virtual meeting and wish to speak) for **not more than three minutes each**. **Speakers must notify the constitutional team at [Constitutional.Team@southwark.gov.uk](mailto:Constitutional.Team@southwark.gov.uk) in advance of the meeting by 5pm on the working day preceding the meeting.**

- (a) One representative (spokesperson) for any objectors. If there is more than one objector wishing to speak, the time is then divided within the three-minute time slot.
- (b) The applicant or applicant's agent.
- (c) One representative for any supporters (who live within 100 metres of the development site). If there is more than one supporter (who lives within 100 metres of the development site) wishing to speak, the time is divided within the 3-minute time slot.
- (d) Ward councillor (spokesperson) from where the proposal is located.



(e) The members of the committee will then debate the application and consider the recommendation.

**Note:** Members of the committee may question those who speak only on matters relevant to the roles and functions of the planning committee that are outlined in the constitution and in accordance with the statutory planning framework.

5. If there are a number of people who are objecting to, or are in support of, an application or an enforcement of action, you are requested to identify a representative to address the committee. If more than one person wishes to speak, the three-minute time allowance must be divided amongst those wishing to speak. Where you are unable to decide who is to speak in advance of the meeting, the chair will ask which objector(s)/supporter(s) would like to speak at the point the actual item is being considered. The clerk will put all objectors who agree to this in touch with each other, so that they can arrange a representative to speak on their behalf at the meeting. The clerk will put all supporters who agree to this in touch with each other, so that they can arrange a representative to speak on their behalf at the meeting.
6. Speakers should lead the committee to subjects on which they would welcome further questioning.
7. Those people nominated to speak on behalf of objectors, supporters or applicants, as well as ward members, will be speaking in their designated time-slots only, apart from answering brief questions for clarification; this is **not** an opportunity to take part in the debate of the committee.
8. Each speaker should restrict their comments to the planning aspects of the proposal and should avoid repeating what is already in the report. The meeting is not a hearing where all participants present evidence to be examined by other participants.
9. This is a council committee meeting to which is open to the public and there should be no interruptions from members of the public.
10. Members of the public are welcome to record, screenshot, or tweet the public proceedings of the meeting.
11. Please be considerate towards other people and take care not to disturb the proceedings.
12. This meeting will be recorded by the council and uploaded to the Southwark Council YouTube channel the day after the meeting.

**The arrangements at the meeting may be varied at the discretion of the chair.**

**Contacts:** General Enquiries  
Planning Section, Chief Executive's Department  
Tel: 020 7525 5403

**FOR ACCESS TO THE VIRTUAL MEETING (ONLINE/BY TELEPHONE)**

**PLEASE CONTACT:**

Planning Committee Clerk, Constitutional Team  
Finance and Governance

Tel: 020 7525 7420 or email: [gerald.gohler@southwark.gov.uk](mailto:gerald.gohler@southwark.gov.uk)



## Planning Committee

MINUTES of the virtual Planning Committee held on Monday 15 June 2020 at 2.00 pm.

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**PRESENT:** Councillor Martin Seaton (Chair)  
 Councillor Barrie Hargrove  
 Councillor James McAsh (Reserve)  
 Councillor Darren Merrill (Reserve)  
 Councillor Adele Morris  
 Councillor Damian O'Brien  
 Councillor Catherine Rose

**OTHER MEMBERS PRESENT:** Councillor David Noakes

**OFFICER SUPPORT:** Simon Bevan (Director of Planning)  
 Jon Gorst (Legal Officer)  
 Yvonne Lewis (Group Manager Strategic Applications Team)  
 Martin McKay (Team Leader, Design and Conservation)  
 Alex Oyebade (Team Leader Transport Policy)  
 Chris Constable (Senior Archaeology Planner)  
 Patrick Cronin (Planning Officer)  
 Gerald Gohler (Constitutional Officer)

### 1. APOLOGIES

There were apologies for absence from Councillors Kath Whittam (Vice-Chair) and Cleo Soanes.

### 2. CONFIRMATION OF VOTING MEMBERS

Those members listed as present were confirmed as the voting members for the meeting.

### 3. NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT

The chair gave notice of the following additional papers which were circulated before the

meeting:

1. Supplemental Agenda No.1 containing the addendum report
2. Supplemental Agenda No.2 containing the members' pack.

#### 4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

The following member of the committee declared an interest in item 5.1 Landmark Court, bounded by Southwark Street, Redcross Way and Cross Bones Graveyard, London SE1:

Councillor Adele Morris, non-pecuniary, as the application is in her ward. Councillor Morris informed the meeting that while she had attended an initial exhibition, she had had no discussions about this application with anyone and had not expressed any view on it.

#### 5. DEVELOPMENT MANAGEMENT

##### RESOLVED:

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the agenda be considered.
2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the reports unless otherwise stated.
3. That where reasons for decisions or conditions are not included or not as included in the reports relating to an individual item, they can be clearly specified.

#### 5.1 LANDMARK COURT, BOUNDED BY SOUTHWARK STREET, REDCROSS WAY AND CROSS BONES GRAVEYARD, LONDON SE1

Planning application number: 19/AP/0830

##### PROPOSAL

*Mixed-use development involving the demolition of 25-33 Southwark Street, the restoration of 15 Southwark Street for residential use and the erection of new buildings comprising: a part 6/8/9-storey office (Class B1) building incorporating a single-storey basement, flexible ground floor uses (Classes A1/A2/A3/A4 and D2) and workspace units (Class B1); a 3-storey workshop building (Class B1); a marketplace with up to 9 permanent stalls (Class A1); 36 residential units in the refurbished 15 Southwark Street building and a new 8-storey block; associated areas of new public realm; hard and soft landscaping; enhancements to Crossbones Burial Ground; means of access and enclosure, and ancillary plant and equipment.*

The committee heard the officer's introduction to the report and addendum report. Members of the committee asked questions of the officers.

The objectors addressed the committee and responded to questions put by members of

the committee.

The applicant's representatives addressed the committee, and answered questions put by the committee.

A supporter who lived within 100 metres of the development site addressed the meeting and answered questions from the committee.

Councillor David Noakes addressed the meeting in his capacity as a ward councillor, and answered questions put by the committee.

The committee put further questions to the officers and discussed the application.

A motion to amend the proposed conditions to exclude A3 and A4 use for the retail unit on the corner of Woods Yard and Redcross Way was moved, seconded, put to the vote and declared carried.

A motion to grant the application was moved, seconded put to the vote and declared carried.

**RESOLVED:**

1. That full planning permission be granted for application 19/AP/0830, subject to:
  - a. the conditions set out in the report and addendum report, and amended as outlined above,
  - b. referral to the Mayor of London, and
  - c. the applicant entering into a satisfactory legal agreement.
2. That in the event that the legal agreement is not entered into by 30 October 2020, the director of planning be authorised to refuse planning permission for 19/AP/0830, if appropriate, for the reasons set out in paragraph 341 of the report.

The meeting ended at 4.43 pm.

**CHAIR:**

**DATED:**

<b>Item No.</b> 6.	<b>Classification:</b> Open	<b>Date:</b> 20 July 2020	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>		Development Management	
<b>Ward(s) or groups affected:</b>		All	
<b>From:</b>		Proper Constitutional Officer	

## RECOMMENDATIONS

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the attached items be considered.
2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the attached reports unless otherwise stated.
3. That where reasons for decisions or conditions are not included or not as included in the reports relating to an individual item, they be clearly specified.

## BACKGROUND INFORMATION

4. The council's powers to consider planning business are detailed in Part 3F which describes the role and functions of the planning committee and planning sub-committees. These were agreed by the annual meeting of the council on 23 May 2012. The matters reserved to the planning committee and planning sub-committees exercising planning functions are described in part 3F of the Southwark Council constitution.

## KEY ISSUES FOR CONSIDERATION

5. In respect of the attached planning committee items members are asked, where appropriate:
  - a. To determine those applications in respect of site(s) within the borough, subject where applicable, to the consent of the Secretary of State for Housing, Communities and Local Government and any directions made by the Mayor of London.
  - b. To give observations on applications in respect of which the council is not the planning authority in planning matters but which relate to site(s) within the borough, or where the site(s) is outside the borough but may affect the amenity of residents within the borough.
  - c. To receive for information any reports on the previous determination of applications, current activities on site, or other information relating to specific planning applications requested by members.

6. Each of the following items are preceded by a map showing the location of the land/property to which the report relates. Following the report, there is a draft decision notice detailing the officer's recommendation indicating approval or refusal. Where a refusal is recommended the draft decision notice will detail the reasons for such refusal.
7. Applicants have the right to appeal to Planning Inspector against a refusal of planning permission and against any condition imposed as part of permission. Costs are incurred in presenting the council's case at appeal which maybe substantial if the matter is dealt with at a public inquiry.
8. The sanctioning of enforcement action can also involve costs such as process serving, court costs and of legal representation.
9. Where either party is felt to have acted unreasonably in an appeal the inspector can make an award of costs against the offending party.
10. All legal/counsel fees and costs as well as awards of costs against the council are borne by the budget of the relevant department.

#### **Community impact statement**

11. Community impact considerations are contained within each item.

#### **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

##### **Director of Law and Democracy**

12. A resolution to grant planning permission shall mean that the director of planning is authorised to grant planning permission. The resolution does not itself constitute the permission and only the formal document authorised by the committee and issued under the signature of the director of planning shall constitute a planning permission. Any additional conditions required by the committee will be recorded in the minutes and the final planning permission issued will reflect the requirements of the planning committee.
13. A resolution to grant planning permission subject to legal agreement shall mean that the director of planning is authorised to issue a planning permission subject to the applicant and any other necessary party entering into a written agreement in a form of words prepared by the director of law and democracy, and which is satisfactory to the director of planning. Developers meet the council's legal costs of such agreements. Such an agreement shall be entered into under section 106 of the Town and Country Planning Act 1990 or under another appropriate enactment as shall be determined by the director of law and democracy. The planning permission will not be issued unless such an agreement is completed.
14. Section 70 of the Town and Country Planning Act 1990 as amended requires the council to have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations when dealing with applications for planning permission. Where there is any conflict with any policy contained in the

development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published, as the case may be (s38(5) Planning and Compulsory Purchase Act 2004).

15. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The development plan is currently Southwark's Core Strategy adopted by the council in April 2011, saved policies contained in the Southwark Plan 2007, the where there is any conflict with any policy contained in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published, as the case may be (s38(5) Planning and Compulsory Purchase Act 2004).
16. On 15 January 2012 section 143 of the Localism Act 2011 came into force which provides that local finance considerations (such as government grants and other financial assistance such as New Homes Bonus) and monies received through CIL (including the Mayoral CIL) are a material consideration to be taken into account in the determination of planning applications in England. However, the weight to be attached to such matters remains a matter for the decision-maker.
17. "Regulation 122 of the Community Infrastructure Levy regulations (CIL) 2010, provides that "a planning obligation may only constitute a reason for granting planning permission if the obligation is:
  - a. necessary to make the development acceptable in planning terms;
  - b. directly related to the development; and
  - c. fairly and reasonably related to the scale and kind to the development.

A planning obligation may only constitute a reason for granting planning permission if it complies with the above statutory tests."

18. The obligation must also be such as a reasonable planning authority, duly appreciating its statutory duties can properly impose i.e. it must not be so unreasonable that no reasonable authority could have imposed it. Before resolving to grant planning permission subject to a legal agreement members should therefore satisfy themselves that the subject matter of the proposed agreement will meet these tests.
19. The National Planning Policy Framework (NPPF) came into force on 27 March 2012. The NPPF replaces previous government guidance including all planning practice guidance (PPGs) and planning policy statements (PPSs). For the purpose of decision-taking policies in the Core Strategy (and the London Plan) should not be considered out of date simply because they were adopted prior to publication of the NPPF. For 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted in accordance with the Planning and Compulsory Purchase Act (PCPA) 2004 even if there is a limited degree of conflict with the NPPF.
20. In other cases and following and following the 12 month period, due weight should be given to relevant policies in existing plans according to their degree of consistency with the NPPF. This is the approach to be taken when considering saved plan policies under the Southwark Plan 2007. The approach to be taken is that the closer the

policies in the Southwark Plan to the policies in the NPPF, the greater the weight that may be given.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Council assembly agenda 23 May 2012	Constitutional Team 160 Tooley Street London SE1 2QH	Virginia Wynn-Jones 020 7525 7055
Each planning committee item has a separate planning case file	Development Management 160 Tooley Street London SE1 2QH	Planning Department 020 7525 5403

## APPENDICES

No.	Title
None	

## AUDIT TRAIL

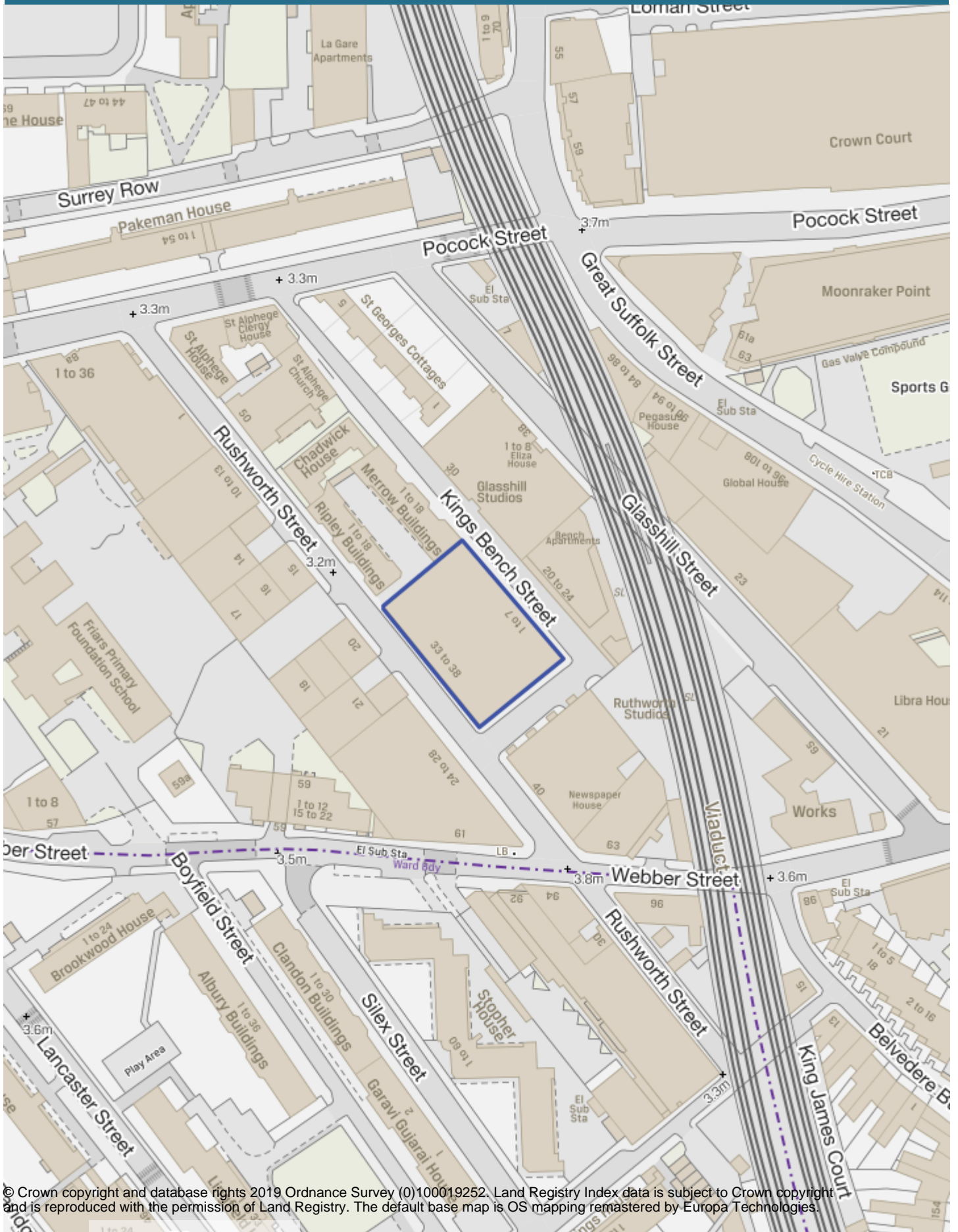
<b>Lead Officer</b>	Chidilim Agada, Head of Constitutional Services	
<b>Report Author</b>	Gerald Gohler, Constitutional Officer Jonathan Gorst, Head of Regeneration and Development	
<b>Version</b>	Final	
<b>Dated</b>	3 July 2020	
<b>Key Decision?</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments sought</b>	<b>Comments included</b>
Director of Law and Democracy	Yes	Yes
Director of Planning	No	No
<b>Cabinet Member</b>	No	No
<b>Date final report sent to Constitutional Team</b>		3 July 2020



# Agenda Item 6.1



33-38 RUSHWORTH STREET, LONDON SE1 0RB AND  
1-7 BENCH STREET, LONDON SE1



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## TABLE OF CONTENTS

RECOMMENDATIONS .....	3
Executive summary .....	3
BACKGROUND INFORMATION.....	5
Site location and description.....	5
Details of proposal .....	7
Planning history .....	8
Planning history of adjoining sites .....	9
KEY ISSUES FOR CONSIDERATION.....	9
Summary of main issues .....	9
Legal context .....	10
Planning policy.....	10
Emerging planning policy.....	13
Principle of development .....	17
Environmental impact assessment .....	20
Impact of proposed development on amenity of adjoining occupiers and surrounding area.....	20
Impact of adjoining and nearby uses on occupiers and users of proposed development .....	25
Transport issues .....	25
Design and heritage.....	27
Impact on trees .....	34
Planning obligations (S.106 undertaking or agreement.....	34
Community Infrastructure Levy.....	36
Sustainable development implications.....	36

Other matters ..... 37

Conclusion on planning issues ..... 38

Community impact statement ..... 38

Consultations ..... 39

Consultation replies ..... 39

Human rights implications..... 46

<b>Item No.</b> 6.1	<b>Classification:</b> Open	<b>Date:</b> 20 July 2020	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 17/AP/4289 for: Full Planning Application  <b>Address:</b> 33-38 RUSHWORTH STREET, LONDON SE1 0RB 1-7 KING BENCH STREET SE1  <b>Proposal:</b> Part demolition of existing commercial buildings (Class B1 Business Use) and construction, behind retained facades, of a part 3, part 4 and part 5 storey building (plus plant enclosure) comprising 3,288sqm GIA of Class B1 Office/Business floorspace and 953sqm GIA of Class A1 / A3 / B1 / D1 / D2 Use floorspace (retail/restaurant/business/community/leisure use), plus service bay, plant, cycles storage, and associated hard landscaping and public realm.		
<b>Ward(s) or groups affected:</b>	Borough and Bankside		
<b>From:</b>	Director of Planning		
<b>Application Start Date</b> 17/01/2018		<b>Application Expiry Date</b> 18/04/2018	
<b>Earliest Decision Date</b> 10/03/2018		<b>PPA Date</b> 2 October 2020	

## RECOMMENDATIONS

1. That the planning committee grant planning permission subject to conditions and the applicant entering into an appropriate legal agreement by no later than 2 October 2020.
2. That in the event that the requirements of (1) are not met by 2 October 2020, the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 131.

## Executive summary

3. The current application was originally included on the agenda for planning committee in September of 2018 however it was withdrawn from consideration following consultation with the chair of the planning committee in order to allow amendments to be made.
4. As originally submitted, the proposed development would have resulted in the

complete removal of the fourth gable that forms the end elevation to Kings Bench Street. This would have been replaced with a new build contemporary brick structure. The remaining three gables would have been retained and the building would be extended upwards to create an additional three storeys of office floorspace to bring the total height of the building to five storeys with the top floor set back, plus an additional level of plant within a screen enclosure.

5. Following withdrawal from the September 2018 planning committee agenda, the applicant has amended the scheme in order to effectively retain the fourth gable fronting Kings Bench Street that was previously proposed for demolition. As part of the amended scheme the retained gable would be modified to create new entrances at ground floor level. The remaining three gables would also be retained and the building would continue to extend upwards by three storeys albeit with setbacks at second and third floor level and a further set back at top floor level. The extended upper floors have also been amended in terms of detailed design and materials.
6. The proposed development would result in a significant uplift in office floorspace, and the introduction of a potential retail or community use within a retained and modified building that would be extended upwards. This would create new employment and retail opportunities in what is a sustainable, well connected location.
7. The historic character of the existing building would be retained and the fabric of the existing building restored to improve its appearance within the streetscene. The alterations to the retained fabric, and the extension, would be a well-considered, sensitive and appropriate addition to the conservation area, particularly in light of the changing context of the surrounding area. Notwithstanding the objection submitted by Historic England, officers considered that the scheme does preserve the character of the Kings Bench conservation area and the setting of nearby listed buildings.
8. The impact on the amenity of neighbours in terms of privacy, outlook and impact on natural light is set out in the report, and it is concluded that whilst there will be impacts, these are no inconsistent with the character of the area and in line with the flexibility expected by the BRE when looking at dense urban environments.
9. The Impact on the highway network, public transport and sustainability are also assessed in the report, and no significant harm is identified which would warrant withholding planning permission, provided that suitable mitigation is secured through conditions and the s106 agreement.
10. Following amendments to the proposed development, a further consultation exercise has been completed. Taking into account both consultation exercises, a total of 74 objections have been received. It should be noted that many of the more recent responses are supplementary comments from residents who originally submitted responses to the initial consultation exercise. The main points of objection and the frequency with which they have been raised are set out in the table below:

Main point of objection	No. of times raised.
Heritage Issues	41
Design, scale, massing	36
Daylight impacts	34

Privacy/Overlooking	33
Consultation issues	21
Noise and disturbance	16
Public realm	13
Land use issues	12
Wind impacts	9
Services and infrastructure	7
Pollution and air quality	6
Transport and traffic	6
Overdevelopment	5
Impact on local businesses	4
Ecology	2
Validation issues	2

## **BACKGROUND INFORMATION**

### **Site location and description**

11. The application relates to a commercial building located at 33-38 Rushworth Street, on the corner with King's Bench Street. The existing building occupies the entire plot and benefits from three street facing frontages: Rushworth Street to the west and King's Bench Street to the east and south. On the northern boundary the building sits immediately adjacent to Merrow House and Ripley House which are both Grade II listed buildings.
12. The existing building has an industrial/warehouse style typically found in the northern part of the borough. It is finished in brick with large windows and four gable end bays. Whilst the building is two storeys in height, the ridge height of the gabled bays takes the total height of the existing building to an equivalent of three storeys.

Image – Site plan



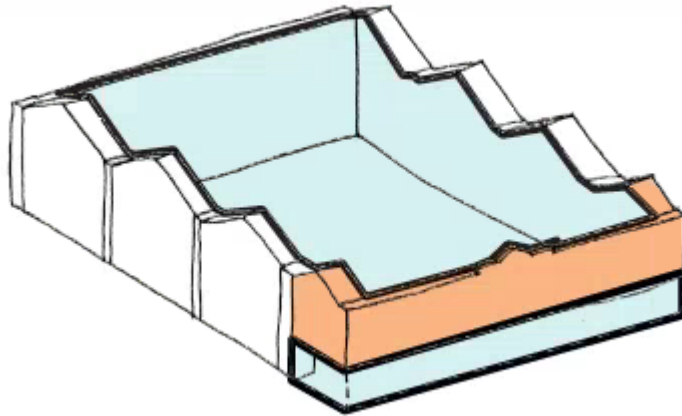
13. The existing building occupies a prominent position within the King's Bench Conservation Area and whilst the building itself is not listed it is considered to be an important heritage asset which makes a positive contribution to the conservation area.
14. The surrounding immediate area is characterised by narrow streets with buildings fronting directly onto the street and ranging in height from three to five storeys. Many of the surrounding buildings have recently been redeveloped (such as Newspaper House to the south-east), or substantially altered and extended (such as Glasshill Studios to the north-west). Other nearby sites are currently under construction, such as at 24-28 Rushworth Street, a mixed use building rising to eight storeys, and 14-21 Rushworth Street, a commercial scheme rising to six storeys. Taller buildings are located on surrounding streets, particularly to the north and west closer to Blackfriars Road, Pocock Street and Great Suffolk Street. In terms of land uses, the area is of a mixed character with uses including offices, residential and commercial. Glasshill Studios includes purpose built rehearsal studio space on the ground floor of this mixed use building.
15. The application site benefits from a PTAL of 6B which indicates the highest level of accessibility to public transport and is located approximately 500m from Southwark Underground Station and 950m from Waterloo East Station.



### Details of proposal

16. Planning consent is sought for the partial demolition of the existing commercial building and development incorporating the remaining facades to provide a part three/part four/part five storey building with basement and a rooftop plant enclosure. The proposed building would accommodate Class A1/A3/B1/D1/D2 floorspace at basement and ground floor level and Class B1 office floorspace part ground floor and all upper levels. Up to 156 cycle parking spaces would be provided within the basement. In total it would provide 3288sqm of Class B1 office space and 953sqm of flexible commercial floorspace. 276sqm of Class B1 space will be provided as affordable workspace.

Image – Fourth gable retained and modified



17. The proposal would result in alterations to the ground floor façade of the end bay fronting onto King's Bench Street opposite Newspaper House. This bay was a later addition to the building and is of a different design and proportions to the remaining facades. In design and heritage terms, it is not considered to be of an equivalent quality to the remaining facades. The proposal would alter this part of the building to increase the amount of glazing at ground floor level to improve the entrance to the offices. The remaining facades would be retained and restored, but with alterations to increase the size of the window openings to improve light to the internal spaces. Above these facades, three new floors of offices would be constructed, set back from the main facades and faced in glass and steel. A further area of roof pant enclosure is set above this.
18. The building would incorporate a vehicle loading bay accessed from Rushworth Street, to enable servicing to take place off-street. The proposal also includes the resurfacing and improvement of the footways around the site, including a slightly widened area of footway on the short end of Kings Bench Street where the new façade has been set back.



## Planning history

19. A pre-application enquiry was submitted in 2016 under references 16/AP/0219 and 16/AP/0311. The pre-application discussions focused on a commercial-led redevelopment of the site retaining the facades. The response to the pre-application enquiry concluded that redevelopment of the site to provide more and enhanced office space in this part of the Central Activities Zone would be welcome. The proposed scale and mass of the building was considered to be broadly acceptable subject to appropriate set backs at the upper floors and further detailed design considerations including improving the contextual relationship between the retained facade and the new building. Further advice was given that the final scheme design should not result in a substantial intrusion into the setting of the listed buildings and should minimise amenity impacts.
20. The current application was included on the agenda for the planning committee on 9 September 2018, however prior to that meeting the decision was taken, in consultation with the Chair of the Committee, that the item would be withdrawn from consideration. Following withdrawal from the September 2018 Planning Committee agenda, the applicant has amended the scheme in order to effectively retain the fourth gable fronting Kings Bench Street, which was previously proposed for demolition. As part of the amended scheme the retained gable would be modified to create new entrances at ground floor level. The remaining three gables would also be retained and the building would continue to extend upwards by three storeys albeit with setbacks at second and third floor level and a further set back at top floor level. The detailed design of the extended upper floors has also been amended to use more muted materials and an amended fenestration pattern.
21. 

<p>07/AP/2938 Application type: Full Planning Application (FUL)  Demolition of existing two storey building and the erection of a part three, part five storey building comprising 2,375 sqm of B1 office floorspace, six two bed flats and two three bed flats  RE-SUBMISSION AGAINST 07-AP-0825  Decision date 20/03/2008 Decision: Refused (REF)  The application was refused for the following reasons:</p>
<ul style="list-style-type: none"> <li>• Excessive scale and massing as well as having poor street frontage and access and being out of character with the area;</li> <li>• Failing to provide for standards of sustainable construction, energy efficiency, provision of on site renewables or reduction in carbon dioxide emissions;</li> <li>• Failure to make provision for the replacement of small business units;</li> <li>• Failure to make acceptable financial contributions in line with the S106 Planning Obligations SPD in order to mitigate the impacts of the development;</li> <li>• Inadequate provision of cycle storage;</li> <li>• Inadequate provision of refuse storage;</li> <li>• Failure to adequately address impacts from flooding; and</li> <li>• Failure to provide a detailed Transport Assessment/Statement to enable assessment of the impacts of the development on the highway network.</li> </ul>

## **Planning history of adjoining sites**

### 10-13 Rushworth Street

22. 13/AP/0943 Planning permission granted with legal agreement on 2 July 2013 for the Demolition of existing building and erection of a five storey plus basement building comprising of office floorspace (B1) on lower ground, ground and first floors with 9 (3x 1 beds, 4x 2 beds, 2x 3 beds) residential apartments above, amenity space, refuse/recycling stores, cycle storage and plant/equipment. This development has now been completed and is occupied.

### 14-21 Rushworth Street

23. 15/AP/4000 – Planning permission granted with legal agreement on 31 March 2016 for the erection of a new part five, part six storey building to provide commercial floorspace at lower ground, ground and first floor level (Use Class B1) and 47 residential units (Use Class C3) on first to fifth floor levels, associated disabled car parking, cycle parking and landscaping. This development was not implemented and the permission has now expired.
24. 17/AP/1959 – Planning permission granted with legal agreement on 4 December 2017 for the construction of a new part five, part six storey building to provide commercial floorspace (Use Class B1), associated servicing, cycle parking and landscaping. This development is now under construction.

### 24-28 Rushworth Street and 61 Webber Street

25. 15/AP/2705 Planning application granted with legal agreement on 4 August 2016 for the Demolition of the existing building and erection of part six part eight storey (plus basement) mixed use building comprising 40 residential units (15 x 1 bed, 18 x 2 bed & 7 x 3 bed) (use class C3) and 2241 sqm (GIA) flexible commercial space (use class B1) and associated works. This development is currently under construction.

### 40 Rushworth Street

26. 13/AP/4404 Planning permission granted with legal agreement on 2 May 2014 for the construction of a ground plus three/four storey building to provide 1163 sqm (GEA) of Class B1 employment floorspace and nine residential units comprising 5 x 2 bedroom apartments and 4 x 3 bedroom maisonettes, shared courtyard and garden space, ancillary plant and equipment. This development is complete.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

27. The main issues to be considered in respect of this application are:
- a) principle of the proposed development in terms of land use;
  - b) design quality;

- c) heritage, in terms of the impact on the existing fabric of the building and the surrounding heritage assets;
- d) amenity impacts on neighbouring occupiers, including in terms of outlook, privacy, daylight and sunlight;
- e) transport impacts;
- f) energy and sustainability;
- g) planning obligations;
- h) community involvement and engagement;
- i) consultation responses
- j) other relevant material planning considerations.

These matters are discussed in detail in the 'Assessment' section of this report.

### **Legal context**

- 28. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless other material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2016, Southwark Core Strategy 2011, and saved policies from the Southwark Plan (2007).
- 29. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

### **Planning policy**

- 30. The site is located within the:
  - Central Activities Zone (CAZ);
  - Bankside, Borough and London Bridge Opportunity Area;
  - Bankside and Borough District Town Centre;
  - Air Quality Management Area.
- 31. It has a Public Transport Accessibility Level (PTAL) of 6b where 1 is the lowest level and 6b the highest, indicating excellent access to public transport.
- 32. The following listed structures are close to the site:
  - Chadwick House and attached railings (Grade II);
  - Merrow House (Grade II);

- Ripley House (Grade II);
  - The Drapers Almshouses, 1-5 Glasshill Street (Grade II).
33. The site is located within the King's Bench Conservation Area and the following conservation areas are nearby:
- Valentine Place;
  - Liberty of the Mint;
  - Union Street.

National Planning Policy Framework 2019 (the Framework)

34. The National Planning Policy Framework published in February 2019 sets out the national planning policy and how it should be applied. The NPPF focusses on sustainable development with three key objectives: economic, social and environmental.
35. Paragraph 215 states that policies in the Framework are material considerations which should be taken into account in dealing with applications.

The relevant chapters of the NPPF are:

Section 2: Achieving sustainable development

Section 6: Building a strong, competitive economy

Section 7: Ensuring the vitality of town centres

Section 9: Promoting sustainable transport

Section 11: Making effective use of land

Section 12: Achieving well designed places

Section 14: Meeting the challenge of climate change, flooding and coastal change

Section 16: Conserving and enhancing the historic environment

The London Plan 2016

36. The London Plan is the regional planning framework and was adopted in 2016. The relevant policies of the London Plan are:

Policy 2.5 Sub-regions

Policy 2.10 Central Activities Zone - strategic priorities

Policy 2.11 Central Activities Zone - strategic functions

Policy 2.13 Opportunity areas and intensification areas

Policy 4.1 Developing London's economy

Policy 4.2 Offices

Policy 4.3 Mixed use development and offices

Policy 4.12 Improving opportunities for all

Policy 5.1 Climate change mitigation

Policy 5.2 Minimising carbon dioxide emissions

Policy 5.3 Sustainable design and construction

Policy 5.12 Flood risk management

Policy 5.13 Sustainable drainage

Policy 5.15 Water use and supplies

Policy 5.18 Construction, excavation and demolition waste  
 Policy 5.21 Contaminated land  
 Policy 6.1 Strategic approach (Transport)  
 Policy 6.9 Cycling  
 Policy 6.10 Walking  
 Policy 6.12 Road network capacity  
 Policy 7.3 Secured by design  
 Policy 7.4 Local character  
 Policy 7.5 Public realm  
 Policy 7.6 Architecture  
 Policy 7.8 Heritage assets and archaeology  
 Policy 7.14 Improving air quality  
 Policy 7.15 Reducing and managing noise  
 Policy 8.2 Planning obligations  
 Policy 8.3 Community infrastructure levy

Greater London Authority Supplementary Guidance

37. Mayor of London: Sustainable design and construction (Saved SPG, 2006)  
 Mayor of London: Accessible London, achieving an inclusive environment (Saved SPG, 2004)  
 Mayor of London: Central Activities Zone (SPG, 2016)  
 Greater London Authority: Use of planning obligations in the funding of Crossrail (SPG, Updated 2016)  
 Mayor of London: Character and Context (SPG, 2014)

Core Strategy 2011

38. The Core Strategy provides the spatial planning strategy for the borough. The relevant policies of the Core Strategy are:

Strategic Targets Policy 1 - Achieving growth  
 Strategic Targets Policy 2 - Improving places  
 Strategic Policy 1 - Sustainable development  
 Strategic Policy 2 - Sustainable transport  
 Strategic Policy 3 – Shopping, leisure and entertainment  
 Strategic Policy 4 – Places for learning, enjoyment and healthy lifestyles  
 Strategic Policy 10 - Jobs and businesses  
 Strategic Policy 12 - Design and conservation  
 Strategic Policy 13 - High environmental standards  
 Strategic Policy 14 - Implementation and Delivery

Southwark Plan 2007 (July) - saved policies

39. With the exception of policy 1.8 (location of retail outside town centres) the council resolved in 2013 to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated in the Core Strategy. Paragraph 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to the publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework.

40. The relevant saved policies of the Southwark Plan 2007 are:

Policy 1.1 Access to Employment Opportunities  
 Policy 1.4 Employment Sites  
 Policy 1.7 Development within Town and Local Centres  
 Policy 2.5 Planning Obligations  
 Policy 3.1 Environmental Effects  
 Policy 3.2 Protection of Amenity  
 Policy 3.3 Sustainability Assessment  
 Policy 3.4 Energy Efficiency  
 Policy 3.6 Air Quality  
 Policy 3.7 Waste Reduction  
 Policy 3.9 Water  
 Policy 3.11 Efficient Use of Land  
 Policy 3.12 Quality in Design  
 Policy 3.13 Urban Design  
 Policy 3.14 Designing Out Crime  
 Policy 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites  
 Policy 3.19 Archaeology  
 Policy 3.28 Biodiversity  
 Policy 3.31 Flood Defences  
 Policy 5.1 Locating Developments  
 Policy 5.2 Transport Impacts  
 Policy 5.3 Walking and Cycling  
 Policy 5.6 Car Parking

Southwark Supplementary Planning Documents

41. Bankside, Borough and London Bridge (Draft SPD, 2010)  
 Design and Access Statements (SPD, 2007)  
 Section 106 Planning Obligations and CIL (SPD, 2015 with 2017 Addendum)  
 Sustainability Assessment (SPD, 2009)  
 Sustainable Design and Construction (SPD, 2009)  
 Sustainable Transport (SPD, 2010)
42. The King's Bench Conservation Area Appraisal 2010 is also a material consideration in determining this application.

**Emerging planning policy**

43. The draft development plan documents of the New London Plan and New Southwark Plan are material considerations that can be given weight

Draft London Plan

44. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2 March 2018. Following an Examination in Public, the Mayor then issued the Intend to Publish London Plan. The Secretary of State responded to the Mayor in March 2020 where he expressed concerns about the

Plan and has used his powers to direct changes to the London Plan. The London Plan cannot be adopted until these changes have been made.

45. Until the London Plan reaches formal adoption it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.
46. The draft New London Plan is the strategic plan which sets out an integrated economic, environmental, transport and social framework for the development of London for the period from 2019 to 2041. The annual housing targets are set for the first 10 years only of the Plan. A range of consultation responses were received to the draft policies from London councils, individuals, businesses, campaign groups, community groups, government bodies etc.
47. Due to the stage it has reached, just before its adoption, the New London Plan can be given weight in decision making, and it is noted that the GLA when commenting upon referable applications does accord substantial weight to many of the emerging policies. The following policies are relevant to this proposal:

GG2: Making the best use of land

GG5: Growing a good economy

SD1: Opportunity Areas

SD4: The Central Activities Zone

SD5: Offices, other strategic functions and residential development in the CAZ

SD6: Town centres and high streets

D1: London's form, character and capacity for growth

D2: Infrastructure requirements for sustainable densities

D3: Optimising site capacity through the design-led approach

D4: Delivering good design

D5: Inclusive design

D8: Public realm

E1: Offices

E2: Providing suitable business space

E3: Affordable workspace

E11: Skills and opportunities for all

HC1: Heritage conservation and growth

G1: Green infrastructure

G5: Urban greening

SI1: Improving air quality

SI2: Minimising greenhouse gas emissions

SI7: Reducing waste and supporting the circular economy

SI12: Flood risk management

T1: Strategic approach to transport

T2: Healthy streets

T3: Transport capacity, connectivity and safeguarding

T4: Assessing and mitigating transport impacts

T5: Cycling

T7: Deliveries, servicing and construction

T9: Funding transport infrastructure through planning  
 DF1: Delivery of the Plan and Planning Obligations.

New Southwark Plan (NSP)

48. For the last five years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 consultation closed in May 2019. These two documents comprise the Proposed Submission Version of the New Southwark Plan.
49. These documents and the New Southwark Plan Submission Version (Proposed Modifications for Examination) were submitted to the Secretary of State in January 2020 for Local Plan Examination. The New Southwark Plan Submission Version (Proposed Modifications for Examination) is the council's current expression of the New Southwark Plan and responds to consultation on the NSP Proposed Submission Version. This version will be considered at the Examination in Public (EiP).
50. It is anticipated that the plan will be adopted in late 2020 following an EiP. As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.
51. The evidence base to support the NSP is substantially complete. The NPPF states that the more advanced the preparation of the plan, the more weight can be given. The NSP has been subject to six rounds of consultation and comprehensive consultation reports have been prepared at each stage in response to representations. The council received 332 representations to the Proposed Submission Version (2018) and as a result some policies were amended and further consultation took place in 2019. The council received 131 representations to the Amended Policies consultation. A full consultation report incorporating comments from both stages of the Regulation 19 consultation was prepared alongside Submission. The council is meeting various community planning interest groups, as well as preparing Statements of Common Ground with individuals and organisations who will be taking an active part in the EiP.
52. In response to the various rounds of consultation on the NSP, a variety of comments and objections were received from individuals, groups and businesses. Where no objections were received a draft policy can be given more weight than for policies where objections were received and have not been resolved, particularly where there is little change from current adopted policies. For example, the following NSP policies can be given moderate weight as no objections were received or they are very similar to policies in the development plan.

P12 Design of places

P13 Design quality

P15 Designing out crime

P17 Efficient use of land

P18 Listed buildings and structures



P19 Conservation areas  
 P22 Archaeology  
 P32 Business relocation  
 P48 Public transport  
 P49 Highway impacts  
 P50 Walking  
 P52 Cycling  
 P53 Car parking (no substantial objections were received, comments related to minimising residential car parking)  
 P55 Protection of amenity  
 P58 Green infrastructure  
 P59 Biodiversity  
 P60 Trees  
 P61 Reducing waste  
 P63 Contaminated land and hazardous substances  
 P64 Improving air quality  
 P67 Reducing flood risk  
 P68 Sustainability standards.

53. Where draft policies are different from the adopted policy (or are completely new policies) and objections were received, the specifics of those objections and the differences from the adopted policy need to be considered for each planning application proposal. For example:

P27 Access to employment and training – objection was received relating to the financial burden.

P29 Office and business development – objections related to the two year marketing justification and differentiation of B Class uses.

P30 Affordable workspace – objections relating to strengthening the policy and including viability testing.

P34 Town and local centres – objections relate to a lower threshold and strengthening the policy.

P40 Hotels and other visitor accommodation – objections received in terms of the new ancillary features requirement.

P46 Community uses – objections to strengthening this policy.

P65 Reducing noise pollution and enhancing soundscapes – the agent of change principle in the NPPF must also be considered.

54. Where objections were received to a draft policy and these have not been resolved through revisions, that policy can have only limited weight. In these instances, the degree of change from adopted policy on these topics should also be considered. Examples of these policies include:

P54 Parking standards for disabled people and mobility impaired people.

P69 Energy – objections that the December 2017 version P62 being too onerous for the carbon reductions

55. The NSP responds positively to the NPPF, by incorporating area visions, development management policies and 82 site allocations which plan for the long term delivery of housing. The NSP responds to rapid change which is occurring in Southwark and

London as a whole and responds positively to the changing context of the emerging New London Plan.

### **Principle of development**

56. At the heart of the NPPF is the presumption in favour of sustainable development. Amongst the key themes in achieving sustainable development are ensuring the vitality of town centres, promoting sustainable transport, supporting a strong economy, and delivering good design.

### Land use

57. The development would provide over 4,000sqm of commercial floorspace, which is approximately double the floorspace of the existing building. This new and improved space includes 3,288 sqm (GIA) of office space and the introduction of 953sqm (GIA) of potential retail or community space at ground floor and basement level. This space is designed for flexible use, so could also be used as additional Class B1 space. The development would provide 10% of its additional Class B1 space as affordable workspace.
58. The application site is located within the Central Activities Zone (CAZ); Bankside, Borough and London Bridge Opportunity Area; and the Borough and Bankside District Town Centre.
59. The London Plan considers Opportunity Areas to be “the capital’s major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other developments linked to existing or potential improvements to public transport.”
60. Southwark’s Core Strategy reinforces the London Plan aspirations for development in the CAZ to support London as a world class city. The CAZ and Opportunity Areas are targeted as growth areas in the borough where development will be prioritised. The council will allow more intense development for a mix of uses in the growth areas and make sure development makes the most of a site's potential (Strategic Policy 1). Additionally, Strategic Policy 10 aims to protect existing business space and support the provision of up to 500,000 sq. metres of additional business floorspace and 25,000 new jobs in the Bankside, Borough and London Bridge Opportunity Area. The policy also seeks to protect existing business floorspace in the wider CAZ and town centre locations where up to 30,000 sq. metres of new business space will be encouraged. The Southwark Plan requires existing employment space to be re-provided when sites are developed.
61. The proposed scheme would deliver 4,241sqm (GIA) of floorspace, not including plant and ancillary space. This would represent an increase of 2,077sqm overall and an uplift of at least 1,124sqm of Class B1 floorspace compared to the existing building, and the extended building could provide around 500 jobs. This is compliant with Southwark Plan and Core Strategy policies as well as fulfilling the principle of prioritising new development within the CAZ and Opportunity Areas. The principle of development is therefore strongly supported. The re-provision and enlargement of B1 office floorspace with high quality, modern and flexible office accommodation is welcomed as a significant benefit of the scheme in accordance with adopted local and

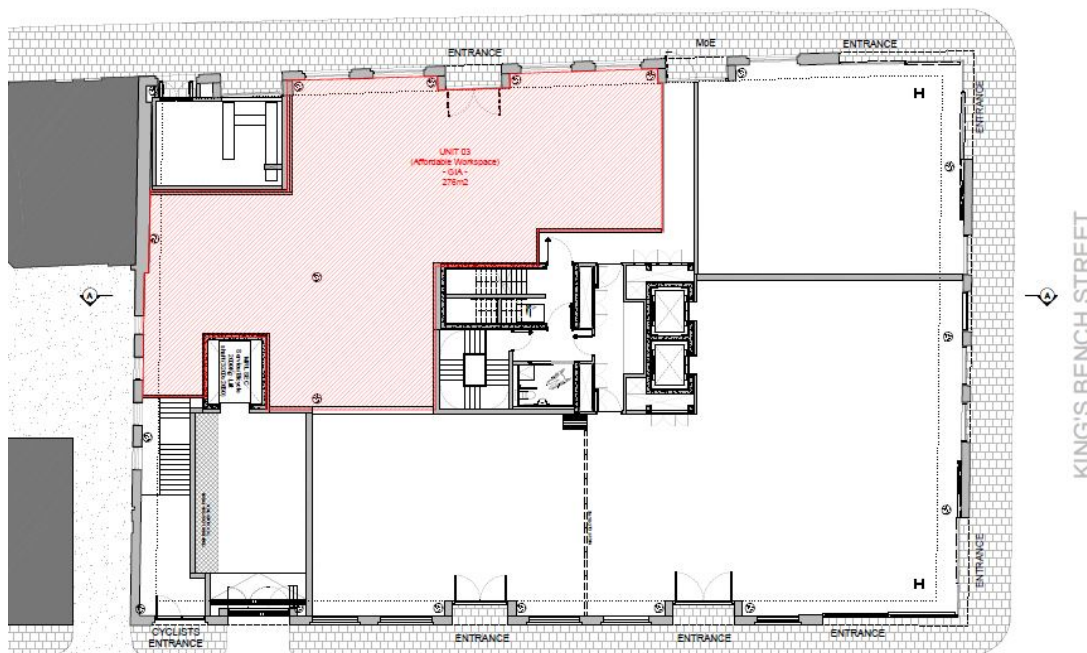
regional policy and meets the Core Strategy objective of increasing the number of jobs in Southwark.

62. The applicant seeks flexible use for the space at basement and ground floor level (953sqm) that could be used for retail (A1/A3), office (B1) or community/leisure uses (D1/D2). Class B1 use has already been determined to be an acceptable land use on this site. Use of this space for Class A1/A3 purposes is fully supported and would provide retail services for office staff and local residents in line with the requirements of Strategic Policy 3 of the Core Strategy. Whilst it is noted that the site is just outside of the Strategic Cultural Area, the potential provision of Class D1/D2 uses (such as gyms, health facilities or training establishments) are appropriate town centre uses which would be supported by Strategic Policy 3 of the Core Strategy. The inclusion of retail or community and leisure uses at ground floor would provide an active frontage in an area which currently lacks activation along most of its street frontages
63. The London Plan has an expectation that commercial development within the CAZ will include an element of housing however this policy should be interpreted flexibly and given the small size of the application site it is considered that the inclusion of housing would not be practicable. The requirement for an additional core to serve residential uses, for instance, would compromise the floor areas and lead to the requirements for outdoor amenity space for any flats. Given the characteristics of the site, including the retention of the facades, it is considered more reasonable to optimise the employment floorspace.

#### Affordable workspace

64. The adopted Core Strategy and saved Southwark Plan policies do not contain a requirement for developments to provide affordable workspace. Policy E3 of the draft London Plan states that '*planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for specific social, cultural or economic development purposes*'. The London Plan is at an advanced state of preparation, and so this policy can be accorded some weight.
65. Emerging policy P28 of the New Southwark Plan deals with affordable workspace. It requires major development proposals to deliver at least 10% of the gross new employment floorspace as affordable workspace on site at a discounted rate for a period of at least 30 years.
66. The applicant has offered to provide a ground floor unit as affordable workspace (note, this is not part of the 'flexible' space.) This unit totals 276sqm and has independent access from Kings Bench Street.

Image – Affordable workspace location



67. The principle of securing affordable workspace as a proportion of the uplift in floorspace where a building is being retained and extended has been established through the early operation of the NSP policy. In this case, the existing building has a Gross Internal Area (GIA) of 2,164sqm. The proposed extended building would have a GIA of 4,976sqm. This figure includes ancillary spaces such as plant rooms and cores. The uplift is therefore 2,812sqm. This figure includes the flexible ground floor space which may, or may not, be used for B class purposes. The offer of 276sqm of affordable workspace is therefore just short (by 5sqm) of 10% of the total uplifted floor area. However, as can be seen from the plan above, the affordable unit is effectively a net area (ie the entire space is useable, rather than including circulation areas, lift cores, plant etc). The unit would therefore represent a highly efficient unit, and much more than 10% of the uplifted net internal area.
68. The space is likely to be operated by the building owners (rather than a specialist workspace provider), which is acceptable provided that they can demonstrate an ability to identify, attract and secure suitable tenants. This would be secured through the s106 agreement. The space would be offered at a 25% discount below market rates for the units, which is likely to be in the region of £37.50 per sqft (ie a 25% discount on £50 per sqft), inclusive of service charges. The affordable workspace would be secured for 30 years from first occupation, with increases in rents linked to inflation. The tenants of the affordable unit would have access to facilities in other parts of the building such as cycle stores, showers and loading areas.

#### Conclusion on land use

69. The development would provide a significant uplift in high quality office floorspace,

improved employment opportunities and would offer active frontages at ground floor level. The affordable workspace meets the requirements of NSP policy P28. The proposal is therefore appropriate in this highly accessible area and would support the designations as an Opportunity Area and town centre. As such, the uses are in compliance with the development plan for this area.

### **Environmental impact assessment**

70. It is considered that the proposed development does not constitute EIA development, based on a review of the scheme against both the EIA Regulations 2017 and the European Commission guidance. The scheme would not generate impacts of more than local significance which would warrant submission of an EIA.

### **Impact of proposed development on amenity of adjoining occupiers and surrounding area**

#### Local environment

71. The immediate local context is typified by long and narrow street blocks fronting directly onto the pavement. The streets are narrow, generally between six to eight metres in width, and enclosed by residential and industrial buildings which generally range in height from two to five storeys although recent consents have permitted buildings up to six and eight storeys tall. With the exception of the gardens to the Draper's Almshouses, there are no formal open spaces and this in turn contributes to the overall sense of a dense urban form with well defined streets. The maintenance of this established character is a factor which should be taken into account when assessing the overall impact of this development.

#### Daylight

72. A daylight and sunlight report was submitted which assessed the original scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight. The revisions to the scheme set the upper floors slightly further back but the daylight and sunlight assessments were not re-run. The figures set out below therefore are based on the original submission, and it is clear that the revisions would have slightly (albeit not significantly) improved the levels of daylight and sunlight retained.
73. The BRE sets out the rationale for testing the daylight impacts of new development through various tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of the original value before the loss is noticeable.
74. The second method that can be used is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and

plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight may be affected.

75. A third test, Average Daylight Factor (ADF), is generally used to measure lighting quality within new developments but it can also be used to assess the impact of a development on a consented scheme that has not yet been built.
76. The following properties have been assessed as part of the daylight and sunlight assessment;
- Glasshill Studios
  - Newspaper House
  - Bench Apartments
  - 24-28 Rushworth Street
  - 14-21 Rushworth Street
  - Ripley House
  - Merrow House.

#### Ripley House and Merrow House

77. These buildings sit to the north west of the proposed development and all of the windows that have been assessed for VSC would continue to meet the BRE requirements.

#### Glasshill Studios

78. Living accommodation in this building starts on the first floor and continues on all upper levels. 15 windows at this property have been assessed for VSC with 13 continuing to meet the BRE guidelines. Of the two windows that have losses beyond the BRE guidelines, one window would have a VSC change from 0.7% to 0.07% which would not be noticeable given the existing very low level and the other window would have a residual VSC level of 18.75% which is considered to be an acceptable level within a dense urban environment.

#### Newspaper House

79. Newspaper House is located to the south of the development site and accommodates commercial use on ground floor and residential use on all upper levels. A total of 30 windows have been assessed for VSC and of these 20 will continue to achieve levels of daylight that either meet or exceed the BRE guidelines. Those windows that would experience losses beyond the BRE guidelines would see VSC reductions in the range of 44% - 25% however in all cases, the residual VSC values would be at least 18.81% which is positive given the tight street pattern and the urban location.

#### Bench Apartments

80. This building is located to the west of the proposed development and a total of 50 windows have been assessed for VSC with 17 windows continuing to receive BRE

compliant daylight. The remaining 33 windows would see VSC reductions of between 45% and 22% with residual VSC values of between 13.63% and 26.56%. It has been noted above that the area around the application site has a very tightly knit street pattern with narrow streets. The BRE allows different daylight and sunlight criteria to be used based on the requirements for daylighting in an area taking into account existing constraints. An important issue is whether an existing building is a good neighbour with appropriate separation distances from adjacent buildings/sites.

81. The BRE allows for a mirror image of an existing building to be taken in order to gauge what a reasonable VSC target for affected windows should be. The applicant has therefore taken a mirror image of Bench Apartments set to an equal height and distance away from the boundary. This 'mirror image' test determines that the reasonable target value for Bench Apartments would be 16.5% VSC.
82. Of the 33 windows that do not meet the BRE Guidelines, 22 would exceed the alternative target value of 16.5%. Overall this would equate to 39 windows meeting the alternative target value in line with the BRE guidelines. Those windows that do not meet the 16.5% target are all located at first floor level and would have VSC levels of between 13.63% and 15.95% which is slightly below the alternative target of 16.5% VSC by between 0.55% and 2.87%. On balance, the impacts on Bench Apartments are considered acceptable taking into account the specific local environment.

#### 24-28 Rushworth Street

83. This building is located to the west/south west of the application site. At the time this application was originally submitted the building on this site was a three storey commercial property however the site is now under development following a planning permission for a for a part six/part eight storey mixed use building.
84. As the new building is not yet been completed, the BRE allows analysis to be undertaken by average daylight factor (ADF). Assessing the impacts on an ADF basis, there would be 32 of 41 rooms that would meet the BRE guidance on suitable ADF levels (78%). Those rooms that would not meet the required ADF are located within deeply inset balconies.
85. Balconies and overhangs significantly reduce the light entering windows below them. This is a particular problem if the balcony is recessed as the windows cannot benefit from light at either side and with the combined effect of the overhang and deep recess it may be difficult to see the sky from inside the room, and hence to receive any direct skylight or sunlight. In these situations the BRE allows further tests to be undertaken with the balcony removed and if the results improve then it can be considered that the balcony is the main obstruction to daylight. In this instance, as the balcony is recessed and not projecting, the test can be undertaken at the façade of the building instead. In this scenario 40 of the 41 rooms would meet the required ADF level which is positive considering the narrow street pattern.
86. The Daylight Distribution test also demonstrates that 28 of the 41 rooms would meet the BRE guidance. It is therefore considered that the impact of the development on the approved schemes at 24-28 Rushworth Street, would be acceptable.

### 14-21 Rushworth Street

87. There was a previous planning permission on this site for a part five/part six storey mixed use commercial and residential building (15/AP/0400). This planning consent now sits alongside a new permission (17/AP/1959) for a wholly commercial scheme.
88. Construction is now underway on the commercial permission (which has no residential units within it). Since at the time of submission it was not clear which permission would be implemented on 14-21 Rushworth Street, the applicants made an assessment for the impact on the residential scheme. That assessment used the Average Daylight Factor (ADF).
89. When assessing the ADF a total of 26 of the 36 rooms would be compliant, and 31 of the 36 rooms would be compliant for Daylight Distribution. However since the building will now be entirely commercial, there is no reason to give weight to these results.

### Conclusions on daylight

90. The daylight and sunlight assessment was undertaken based on the originally submitted plans. The subsequent amendment to the scheme resulted in the upper floors of the building having a deeper set back from the site boundaries and as such these daylight and sunlight results would represent a worst case scenario as the impacts would likely be reduced as a result of the amended scheme. Overall, the impacts on daylight are limited and are considered acceptable taking into account the existing tight knit urban grain of the immediate locality, the fact that the residual VSC levels would be conversant with those typically found in urbanised locations, and the benefits that would be brought forward from developing the site including the uplift in employment floorspace and jobs as well as the provision of high quality office accommodation.

### Sunlight

91. Only windows that face within 90 degrees of due south have been tested. This includes windows within Ripley House, Merrow House, Glasshill Studios and Bench Apartments. All windows assessed at Ripley House, Merrow House and Glasshill Studios pass the BRE sunlight tests.
92. Of the 48 windows assessed for sunlight at Bench Apartments, 42 would comply with the BRE guidelines and the remaining six would achieve sunlight values of between 22% and 23% which is only marginally below the BRE target of 25% and as such the impacts are considered to be acceptable.

### Overlooking, outlook and privacy

93. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear.
94. Following scheme amendments, at the closest points there would be a separation distance of approximately 11.8m between the extended upper floors of the proposed development and Newspaper House on King's Bench Street and between 12.84m and



11.98m between extended upper floors of the development and Bench Apartments. Given that the scheme retains much of the façade and building line of the existing building, the proposed separation distances mimic the existing situation albeit that the building is increasing in height to accommodate new upper levels.

Image – Separation distances and height context (originally proposed)

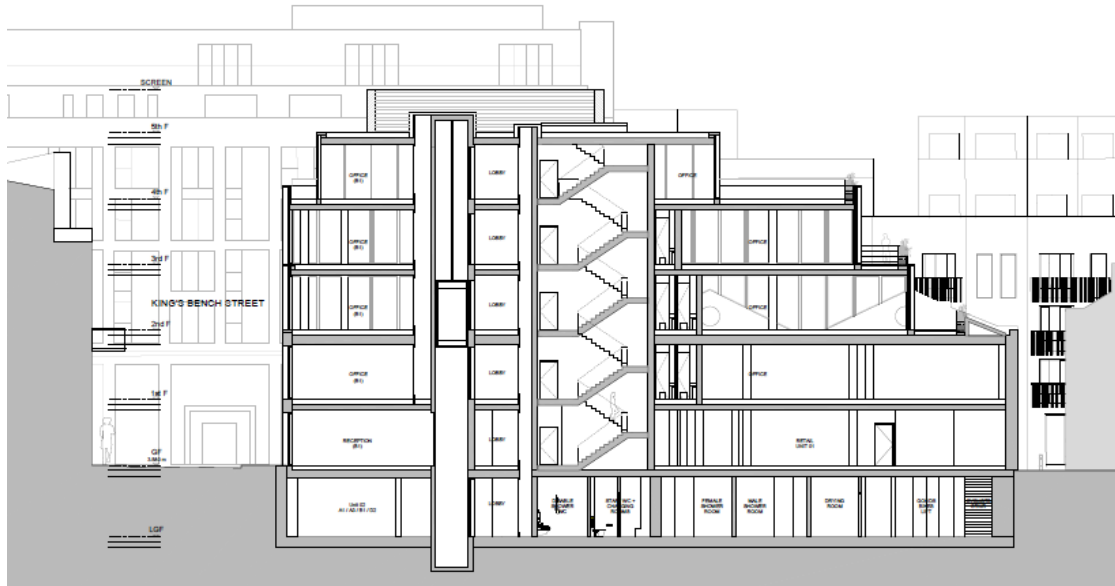
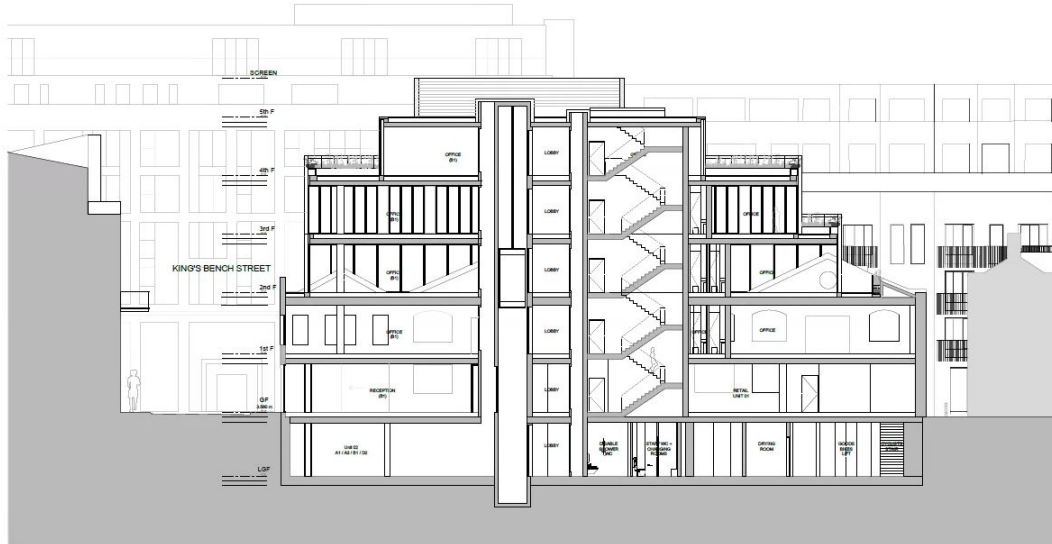


Image – Separation distances and height context (amended proposal)



95. In conclusion, the recommended separation distances would not be achieved in all instances however the shortfalls are considered to be very minor in nature ranging from 2cm to 20cm and are acceptable in the context of the narrow street width typical of the immediate area and the existing situation with the current building. The separation distances being proposed are comparable to other recently approved

schemes in the area including Newspaper House and the schemes on Rushworth Street, all of which approved buildings fronting directly onto the pavement. Officers are therefore satisfied that neither outlook nor privacy for adjacent occupiers would be significantly compromised.

#### Disturbance

96. The use of the site for an increased quantum of commercial floorspace is not anticipated to result in any significant additional disturbance to residents. It is noted that the proposal includes roof terraces at levels immediately adjacent to Mellow House and Ripley House however these terraces step away from the common boundary and it is considered that conditions to control the hours of use of the terraces can adequately mitigate any potential harmful impacts.
97. It is noted that Glasshill Studios includes rehearsal space at ground floor level. Concerns have been raised by the current operator that the rehearsal space would be subject to unacceptable and ongoing disturbance as a result of both demolition/construction and the operation of the completed development. The operator of Glasshill Studios considers that these impacts would detrimentally harm their business. Whilst it is noted that all new developments entail a degree of disturbance during the construction period which is largely unavoidable if development is to take place, these impacts can be reduced, managed and mitigated through the implementation of a Demolition/Construction Environmental Management Plan, a Construction Logistics Plan and a Service Management Plan. These plans would be required by planning condition should consent be granted and the details of the plans would be considered in full consultation with the council's Environmental Protection Team.

#### **Impact of adjoining and nearby uses on occupiers and users of proposed development**

98. It is not anticipated that there will be any conflict of use that would have any adverse impact on occupiers of the proposed retail or office spaces.

#### **Transport issues**

99. Saved policy 5.1 of the Southwark Plan seeks to ensure that development is located near transport nodes or, where they are not, it must be demonstrated that sustainable transport options are available to site users and sustainable transport is promoted. In addition, saved policy 5.6 of the Southwark Plan requires development to minimise the number of car parking spaces provided and include justification for the amount of car parking sought taking into account the site Public Transport Accessibility Level (PTAL), the impact on overspill car parking, and the demand for parking within the controlled parking zones.

#### Public transport accessibility

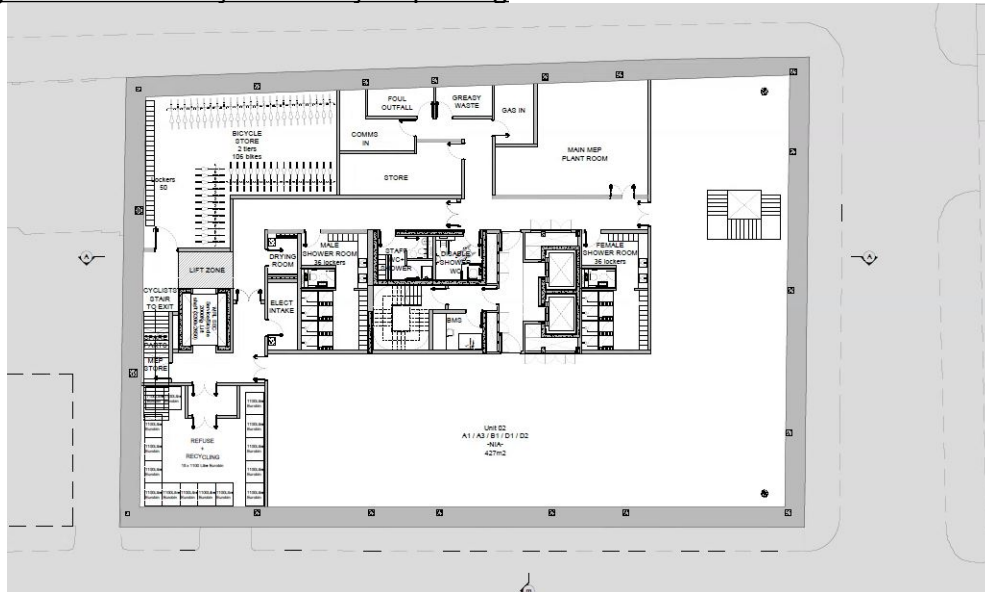
100. The site is located within an area of excellent (6b, the highest level) public transport accessibility with short walking distances to both Southwark Underground and Waterloo Station as well as lying in close proximity to Blackfriars Road and the many

bus routes that use this artery.

### Car Parking

101. Borough Controlled Parking Zone provides adequate parking control in this vicinity on weekdays from 08:30 to 18:30. There are some car club spaces in the vicinity of this development including one on Pocock Street and loading bays on the stretches of King's Bench Street/Rushworth Street flanking this development. The proposed development would be car free which is fully supported in addition to the development being excluded from those eligible for car parking permits in the surrounding CPZ.

### Image – Basement layout and cycle parking



### Cycle Parking

102. There are a number of cycle docking stations close to this site, one of which is on the neighbouring Webber Street. The applicant has proposed 53 two-tier cycle racks and 50 lockers together containing 156 cycle parking spaces in the basement level, which would be accessed via a lift and stairs from the ground floor. The cycle parking level is significantly higher than the required 112 cycle parking spaces required by the London Plan and as such is considered to be policy compliant.

### Servicing

103. Overall, the council's Transport Team have estimated that this development would produce around 29 and 35 two-way vehicle movements in the morning and evening peak hours respectively. It is also forecasted that the existing office use of this building would have created 8 two-way vehicle movements in the morning or evening peak hours, meaning that that this development would generate 21 and 27 net additional two-way vehicle movements in the morning and evening peak hours, individually. The Transport team consider that this would not have any noticeable adverse impact on the prevailing vehicle movements on the adjoining roads.

104. Servicing would take place via a loading bay accessed from Rushworth Street however this would require vehicles to either reverse into the loading bay or reverse out of it onto the highway. The councils Transport policy team have raised some concerns about this arrangement, however the alternative preferred option of a vehicle being able to turn within the site is not feasible given the size and layout of the building. The creation of an inset on-street loading bay would also not be feasible since the building line is being maintained and an inset bay would narrow the pavement. On balance, the on-site loading bay is acceptable as the best option in the circumstances. A Service Management Plan will also be required as part of the S106 Agreement in order to ensure adequate servicing provision as well as mitigation of any impacts.

### **Design and heritage**

105. The King's Bench Conservation Area Appraisal notes that it is important that the integrity of this development pattern is retained and that any new buildings within the conservation area must observe the same building lines and set-backs as the historic street, and, similarly, the same plot width and rhythms of historic development. The appraisal notes that opportunities for new development in the conservation area are limited; however, there may be opportunities for sensitive adaptation or restoration of the existing buildings. Though new design would need to be sympathetic to the existing characteristics of the area, modern design is not necessarily to be precluded. The success of contemporary design in conservation areas comes not from aping the style of the existing historic buildings, but in building on the unique townscape opportunities of density and height that the historic development pattern affords.
106. The application site comprises the southern end of a narrow street block, formed by King's Bench as it dog-legs west to connect to Rushworth Street. The site is built out as a single, low-rise industrial warehouse that sits at the back edge of the narrow pavements that surround its three sides. The two-storey warehouse dates from the early twentieth century and was initially constructed as three gabled bays that span east to west across the site, providing a double-fronted building onto Rushworth Street and King's Bench (east). A fourth gabled bay was added shortly after its completion, albeit of a narrower footprint, with entrances onto King's Bench (south). The punched-hole facades are mainly in red brickwork with brown brick footings, and feature attractive segmental arched and round openings, with many of the windows retaining their traditional multi-paned steel fenestration. Others, however, have been replaced in unappealing modern uPVC and the building's doorways are secured by external roller shutters. Several brickwork panels and piers have become over-painted or rendered, whilst the roof has been re-covered in standing-seam metal.
107. Whilst the building is in need of general refurbishment, it nonetheless remains an attractive Edwardian warehouse and makes a positive contribution to the King's Bench Conservation Area; its distinctive gabled form is illustrative of the area's wider industrial character. Whilst its form sits well with the intimately scaled streets and the Grade II listed tenement blocks of neighbouring Ripley House and Merrow House, its context is changing with the completion of the part 4/5-storey Bench Apartments building (22 King's Bench) and similar scaled Newspaper House (40 Rushworth Street); and the consented 6-storey redevelopment of 14-21 Rushworth Street and 8

storey 24-48 Rushworth Street now under construction.

108. The scheme has been amended following responses to consultation, but the general approach remains the same. The additional office floors would rise in a lightweight construction and geometric form from behind the retained two storey façade of the existing warehouse building.
109. Importantly, the scheme makes excellent use of the retained facades at ground floor and first floor level to provide a well-activated and highly animated street frontage around the site's perimeter. The steel shutters are removed and bricked-up windows re-opened to allow much more engagement with the adjacent public realm, presenting a high quality of urban design. The new facades would allow views into the building to activate the frontages.
110. Whilst the general approach remains unchanged, a series of design amendments have been made to address concerns raised by the Members and the public and in response to comments made by Historic England; albeit the latter maintain its objection to the scheme.
111. The most significant revision is the retention of the gabled end bay onto King's Bench Street (south), which previously was proposed to be demolished to make way for a new building that would form the main office entrance(s). That the existing end bay is now retained is welcomed; although it is considered to be of a lower overall quality than the three main bays, it does relate well to the rest of the building and to the character of the street. Although the retention is welcomed, it does mean that the widening of the footway on Kings Bench Street offered under the previous design cannot be achieved. Some limited increase in the pavement width is achieved through the slight setting back of the glazing line in areas where the façade is opened up, but the increase in public realm is less than could have been gained if the bay had been rebuilt to a narrower footprint as originally proposed.

Image – Rushworth Street contextual elevation



112. Whilst the end bay is effectively being retained, in practical terms it will require some dismantling and rebuilding, as the original brickwork is patched and altered and the

façade is generally in a poor state of repair. Conversely, its careful rebuilding should enhance its appearance and contribution to the street, though the detailed operation of this should be controlled by condition. It is notable that in its rebuilding the opportunity would be taken to incorporate fully glazed ground floor entrances onto both street corners. The corner cutaways bring a strong legibility and contemporary appearance to the building's main entrances, without undermining or unduly detracting from the façade's inherent design.

113. Elsewhere along the street frontages, the existing bays and new, distinctive double-height glazed entrances are retained from the original design iteration, emphasising the rhythm of the facades. However, the proposals no longer include the restoration in full of the multi-paned steel windows, opting instead to install large paned windows. This gives the historic facades an updated, transparent feel and is part of the modern office aesthetic

Image – Kings Bench Street



114. In addition to retaining the end gable, the other main change is to the massing of the new building as it emerges above. The setback of the new floorplate has been increased to 1.5m behind the retained facades, including onto King's Bench (south). This increase may well be modest but is sufficient to retain the distinct profile of the original built form, with the setting back of the new building above reading as more pronounced. The increased articulation brings a greater visual balance between the two contrasting gabled and geometric forms, as well as easing the apparent scale of the overall building within the townscape.
115. Whilst the footprints of the upper floors are reduced in size, the office accommodation nonetheless remains high quality, with flexible, decent sized floorplates; excellent



floor-to-ceiling heights; and good daylight penetration.

116. A final notable feature is the switch in material finish of the upper floor offices. Whilst the curtain-wall glazing and outer framework remain as previous, the latter's rose-coloured aluminium has been substituted with corten steel. The revised finish is a distinct improvement both in terms of material quality and appearance. Its naturally weathered dark tones and engaging patina bring a visual richness that sits well with the robust brickwork below; and brings a quasi-industrial aesthetic that complements the historic warehouse. Importantly, the detailed design of the framework remains unchanged, with its stacked arrangement of vertical fins that vary in separation between floors. The appearance is ordered and refined, and is sufficiently open and lightweight as not to appear overbearing.
117. In terms of the townscape and heritage impacts, the additional height of the new building reads as comfortable within the wider townscape setting that includes similar scaled new office and residential buildings to the north and west of the site. Closer by, within King's Bench and Rushworth Street, where the scale is expressed as three storeys, the retention of the warehouse façades and the setback form above moderate the visual impact of the increased scale. A good sense of the existing shoulder height to the street is retained, with the upper pavilion structure sitting sufficiently discreet in the background. The new upper floors are significantly set back from the neighbouring Ripley House and Merrow House, maintaining the existing visual relationship of the retained warehouse with the adjacent residential blocks, with the significant increase in massing stepped away from the Grade II listed buildings, thereby preserving their settings.

Image – Rushworth Street/Kings Bench Street

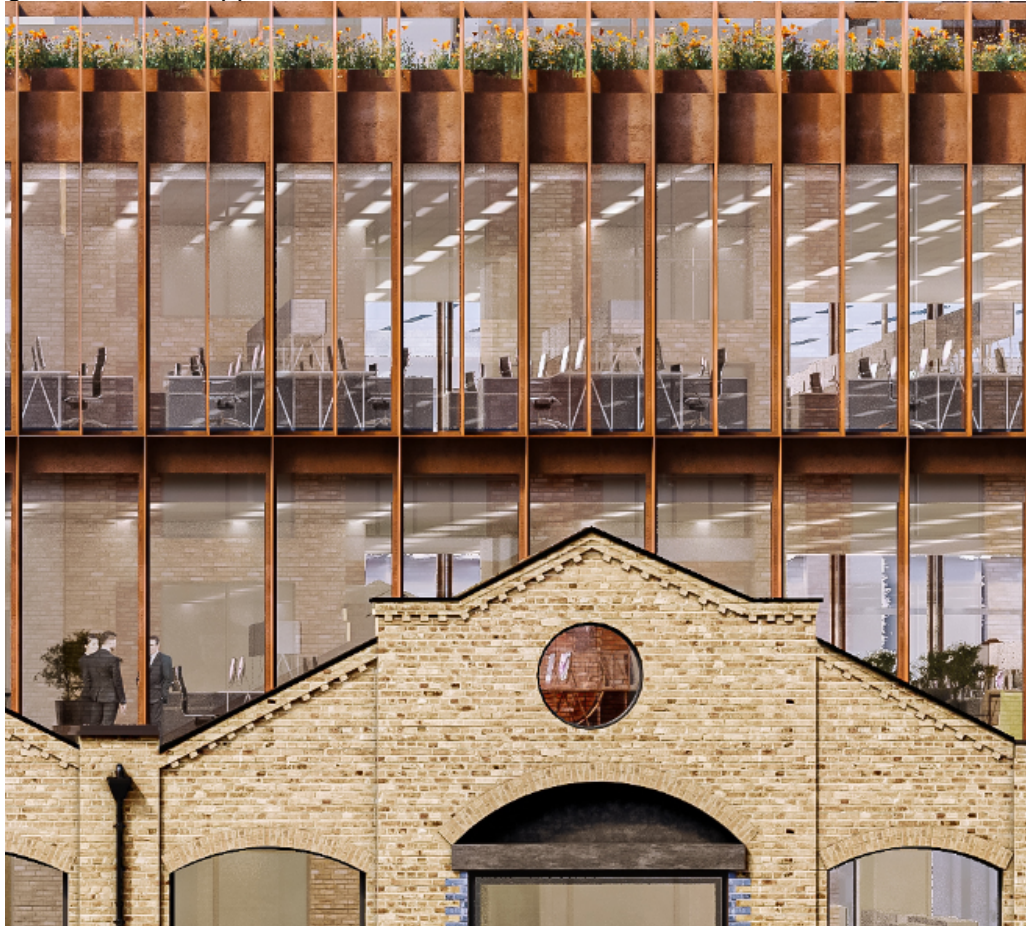


118. In terms of the impact on the King's Bench conservation area, the retention and refurbishment of the building's façades are a direct response to working to preserve the positive contribution that the building makes to the character and appearance of the area. The façades represent the most significant elements of the Edwardian building, further analyses having shown the interior fabric to be utilitarian and not worthy of retention. Nonetheless, the proposals bring distinct changes to a non-designated heritage asset, not least the modern interventions of the glazed cut-away corners, modern entrances and single pane windows; albeit these features are secondary to the contribution of its restored brickwork fabric and distinctive gabled roof form.
119. Whilst the addition of the pavilion-like extension intrudes upon the host building, this is moderated by the pavilion's articulated massing and high architectural and material qualities. It offers an engaging contrast to the host building without challenging its attractive brickwork facades or overwhelming its distinctive gabled roof form. That there is a loss of architectural integrity as a stand-alone Edwardian warehouse building is nonetheless acknowledged. The impacts of this and the modest elevational interventions (see above) on the non-designated heritage asset and its positive contribution to the conservation area are harmful, but represent less than substantial harm. The impacts should be weighed against the public benefits of the scheme; which, among others, include the design benefits of the retained and refurbished warehouse facades; the urban design contribution of the active street frontages; and



the architectural quality of the new office accommodation.

Image – Extended upper level



120. Overall, the proposals represent a high quality scheme, where the new architecture is refined and well-articulated; and where its contrast with the retained Edwardian warehouse works well, presenting an engaging, but sufficiently neutral backdrop. The amendments are welcome improvements to the scheme; with more of the original facades retained, and the extended setbacks working in the round both to retain a greater sense of the warehouse profile and to improve the apparent scale onto the adjacent streets.
121. The proposals sit comfortably within the wider townscape and setting of the King's Bench Conservation Area, whilst preserving the setting of the adjacent Grade II listed tenement blocks. There are some impacts upon the building as a non-designated heritage asset and its positive contributor to the conservation area, though the impacts are less than substantial. Special regard should be paid to the need to preserve or enhance the conservation area, and in this case the limited harm has been outweighed by planning benefits, including design benefits.

Image – Long view



122. Historic England has acknowledged the revisions to the scheme and welcomed the retention of the external facades of the 4<sup>th</sup> bay, but has maintained its overall objection to the scheme. It regards the proposals as being ‘skin deep’ and lacking authenticity and identity, whilst the building rising above appears incongruous. It considers that the scheme has not been adequately justified and the proposed roof extension harms the conservation area and setting of the adjacent Grade II listed social housing.
123. In response, whilst the building is an attractive early twentieth century warehouse, beyond its handsome facades and gabled form there is little merit within the building. As referred to earlier, following further inspection, it is evident that its interior is distinctly utilitarian in design and material finishes. Its floorplans have been crudely subdivided into a warren of small commercial studio units; a number of which are windowless.
124. The revised scheme preserves and restores the facades in-the-round and repurposes them for a high quality office scheme. The additional setback of the new upper floors is similarly in-the-round and is sufficient to allow the building’s gabled form to remain distinct within the streetscene. The upper floor extension will be seen, although its

massing is eased by the setback and steps away sufficiently from the adjacent listed buildings, preserving their setting.

125. Whilst there would be the loss of some original fabric through the internal works and the modest elevation interventions, the impacts and harm are less than substantial, and can be outweighed by the planning benefits of the scheme. Importantly, the architecture is refined and well-articulated, and whilst contrasting, does not overpower or challenge the host facades and gable form, but sits calmly above. As such, the design approach is welcome.

### **Impact on trees**

126. The proposed development includes roof terraces and the provision of three street trees. The roof terraces and trees will be secured by condition in order to secure further design detail as well as an appropriate species. No trees would be removed as a result of the proposed development.

### **Planning obligations (S.106 undertaking or agreement)**

127. Saved Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 of the Southwark Plan is reinforced by the recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic Policy 14 'Implementation and delivery' of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

128. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

129. After detailed evaluation, the following table sets out the required site specific mitigation and the applicant's position with regard to each point:

Planning Obligation	Mitigation	Applicant Position
Employment in the development	33 sustained jobs for unemployed Southwark Residents at the end phase or meet any shortfall through the Employment in the End Use Shortfall Contribution. The maximum Employment in the End Use Shortfall Contribution is	Agreed

	£141,900 (based on £4300 per job).	
Transport - site specific	£139,680 towards the provision of bus countdown facilities at bus stops on Blackfriars Road; raised entry treatment at Rushworth Street junctions; improvements to the pedestrian route to the riverside and relocation of cycle store and lighting columns. Submit a scheme for the provision of 2(two) disabled bays, 1(one) of which must be equipped with an active electric vehicle charging point (EVCP).	Agreed
Public realm	Works to resurface King's Bench Street including the pavement on the east side and tree planting. The works will be required 'in kind' and will form part of the S.278 Agreement.	Agreed
Trees	Not specifically required unless highways issues prevent some of the proposed trees from being planted in which case a contribution will be sought - £5,000 per tree.	Agreed
Total	£431,100	Agreed
Admin charge (2%)	£8,622	Agreed

The S106 Agreement would also secure

130. The contributions and in lieu works detailed in the table above will be secured under the S106 Agreement alongside an Affordable Workspace Strategy, amendments to the Traffic Management Order and the following S.278 Highways work:

- The retaining walls of the basement are in close proximity to the public highway and as such detailed design and method statements (AIP) for foundations and basement structures retaining the highway (temporary and permanent) in accordance with BD 2/12 'Technical Approval of Highway Structures' should be submitted and approved by the Highway Authority prior to construction.
- Repaving of the footway fronting the proposed development including new kerbing on Rushworth Street and King's Bench Street using materials in accordance with Southwark's Streetscape Design Manual Heritage palette – i.e. Yorkstone slabs and 300mm wide silver grey granite kerbs.
- Construction of the crossover for the loading bay to SSDM Type 1 detail.
- All utility covers within affected footway areas to be changed to recessed type covers.
- Promote TRO to amend parking arrangement on Rushworth Street. As well as



- works to include road marking and signage.
  - Repair any damages to the highway within the vicinity of the development resulting from construction vehicles.
  - The reconstruction of the footways adjoining this site on Rushworth Street and King's Bench Street plus the relocation of the badly-positioned lighting columns on King's Bench Street.
  - Works to resurface King's Bench Street including the pavement on the east side, provision of a loading bay and tree planting.
131. In the event that an agreement has not been completed by 2 October 2020, the Committee is asked to authorise the director of planning to refuse permission, if appropriate, for the following reason:

In the absence of a signed Section 106 Agreement, there is no mechanism in place to avoid or mitigate the impact of the proposed development on public realm, transport network or employment and the proposal would therefore be contrary to Saved Policy 2.5 'Planning Obligations' of the Southwark Plan and Policy 14 - 'Implementation and delivery' of the Southwark Core Strategy, the Southwark Supplementary Planning Document 'Section 106 Planning Obligations' 2015, and Policy 8.2 Planning obligations of the London Plan.

### **Community Infrastructure Levy**

132. S143 of the Localism Act 2011 states that any financial sum that an authority has received, will, or could receive in the payment of CIL is a material "local financial consideration" in planning decisions. The requirement for Mayoral and Southwark CIL is a material consideration. However, the weight to be attached to a local finance consideration remains a matter for the decision-maker.
133. Mayoral CIL is to be used for strategic transport improvements in London, primarily Crossrail. The levy is applied to all developments at a rate of £60 (plus indexation) per square metre in Southwark. Southwark CIL in this location has a rate of £125 for retail and £0 for office. SCIL is to be used for infrastructure that supports growth with a Southwark commitment to spend at least 25% locally. The proposed development would generate the following estimated Mayoral and Southwark CIL contributions:
134. Mayoral CIL - £762,643.27  
Southwark CIL - £166,446.51
135. The final CIL figures will be determined prior to completion of the S106 Agreement based on the detailed CIL liability information that will be submitted. The applicant can offset the Mayoral CIL payment against the Cross Rail contribution.

### **Sustainable development implications**

#### Carbon reduction

136. The Energy Strategy demonstrates how the energy hierarchy has been applied to the proposed development in order to achieve the carbon reduction targets set out in Strategic Policy 13 of the Core Strategy and the London Plan. The Core Strategy and

the London Plan also state that there is a presumption that all major development proposals will seek to reduce carbon dioxide emissions by at least 20% through the use of on-site renewable energy generation wherever feasible. In addition, the London Plan expects developments to achieve a reduction in carbon dioxide emissions of 35% over Part L of the 2013 Building Regulations.

137. The proposed development will incorporate Air Source Heat Pump technology alongside a range of Be Lean, Be Clean, Be Green principles that result in an overall carbon reduction of 36.7% over Part L of the 2013 Building Regulations which is compliant with the London Plan.

#### BREEAM

138. The new building will be required to meet BREEAM 'Excellent' and a BREEAM pre-assessment has been submitted with the application demonstrating that this category is achievable for all floorspace that would be in B1 use. Should the flexible unit on the ground floor be used for retail uses then this unit would achieve 'Very Good'. Attaining BREEAM 'Excellent' for the overall development will be a conditioned requirement of any consent issued.

#### **Other matters**

##### Air quality and noise

139. A flexible use is sought for the ground floor and basement meaning that the end user is not yet defined. As such the space could be used as a retail unit, restaurant, office space or a Class D1/D2 use which could include a gym, training establishment or health facility. As such, the councils Environmental Protection Team have recommended a series of conditions aimed at protecting amenity for adjacent occupiers in order to minimise disturbance from noise and odours. The relevant conditions will be imposed on any consent issued and will need to be satisfied prior to any development taking place.

##### Archaeology

140. The site is not within an Archaeological Priority Zone, and the proposed new build is of limited below ground impact. In this instance the archaeological resource would not be compromised by these works. Therefore, no further archaeological assessment, fieldwork or conditions are required in consideration of this application.

##### Flood risk

141. The site is located in Flood Zone 3 which is defined as having a 'high probability' of river and sea flooding and accordingly the applicant has submitted a Flood Risk Assessment. The Environment Agency were consulted on the application and have recommended several conditions that should be attached to any consent issued alongside conditions that have been recommended by the councils own Flood and Drainage Team.

### **Conclusion on planning issues**

142. The development of this site is welcomed and it would provide additional high quality commercial floorspace that would bring with it the potential to create around 500 jobs as well as providing affordable workspace in a high value area of the borough. This fully complies with the development plan and reinforces the role of the CAZ in supporting London's economy. The retention and refurbishment of the high quality facades which are a key heritage asset within the surrounding conservation area is also welcomed.
143. The proposed development would exhibit high standards of design and materiality and is set to an appropriate height, scale and massing in the context of the immediate area and the adjacent emerging developments. The high quality of design together with the benefits of restoration of the historic facades would serve to preserve the character of the King's Bench Conservation Area and the setting of the adjacent listed buildings at Merrow House and Ripley House.
144. The impacts of the scheme in relation to daylight/sunlight and privacy are considered to be acceptable on balance particularly in the context of the historic street pattern, the retention of the existing facades and the pattern of new development taking place on Rushworth Street and completed developments on King's Bench Street such as Newspaper House which reinforce the tight knit nature of the conservation area.
145. It is therefore recommended that planning permission be granted, subject to conditions as set out in the attached draft decision notice and the completion of a s106 legal agreement on terms as set out above.

### **Community impact statement**

146. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act:
- a) The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
  - b) The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
    - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connect to that characteristic
    - Take steps to meets the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
    - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
  - c) The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due

regard, in particular, to the need to tackle prejudice and promote understanding.

147. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
148. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.
149. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
150. The applicant has submitted a Statement of Community Involvement that outlines the various consultation methods and events that were undertaken to locally publicise the proposed development including invitation flyers, invitation emails and public exhibitions held on 22 and 23 September 2017. The applicant made further contact with surrounding residents following the submission of the revised information last October, and offered to discuss the changes to the scheme.

### **Consultations**

151. Details of consultation and any re-consultation undertaken in respect of this application are set out in Appendix 1.

### **Consultation replies**

152. Details of consultation responses received are set out in Appendix 2.

#### Summary of consultation responses

##### Environment Agency

153. No objection subject to conditions regarding groundwater contamination, remediation and Sustainable Urban Drainage Systems.  
**Response** - Noted and agreed. The relevant conditions will be attached to any consent issued.

##### Historic England

154. Concerns regarding the demolition works to the existing building and that this will cause harm to the significance of local heritage assets and the conservation area. Historic England has acknowledged the major revisions to the scheme and welcomed the retention of the external facades of the 4<sup>th</sup> bay, but has maintained its overall objection to the scheme. It regards the proposals as being 'skin deep' and lacking authenticity and identity, whilst the building rising above appears incongruous. It considers that the scheme has not been adequately justified and the proposed roof extension harms the conservation area and setting of the adjacent Grade II listed social housing.  
**Response** – The majority of the building will be retained, including all facades with only the internal fabric being removed as well as some minor modifications to increase



window openings and provide new entrances. Whilst the building is an attractive early 20<sup>th</sup> century warehouse, beyond its handsome facades and gabled form there is little merit within the building. As referred to earlier, following further inspection, it is evident that its interior is distinctly utilitarian in design and material finishes. Its floorplans have been crudely subdivided into a warren of small commercial studio units; a number of which are windowless. The revised scheme preserves and restores the facades in-the-round and repurposes them for a high quality office scheme. The additional setback of the new upper floors is sufficient to allow the building's gabled form to remain distinct within the streetscene. The upper floor extension will be seen, although its massing is eased by the setback and steps away sufficiently from the adjacent listed buildings, preserving their setting. The high quality of design together with the retention of the historic facades would serve to preserve the character of the King's Bench Conservation Area and the setting of the adjacent listed buildings at Merrow House and Ripley House.

London Fire Brigade

155. No objections.  
**Response** - Noted.

Metropolitan Police

156. No objection, the development should be required to achieve Secured by Design certification.  
**Response** - Noted and agreed, the relevant condition will be attached to any consent issued.

Natural England

157. No objections  
**Response** - Noted.

Thames Water

158. No objection subject to conditions regarding piling.  
**Response** - Noted.

Transport for London

159. No objections.  
**Response** - Noted.

Neighbour responses

160. Following neighbour consultation and subsequent re-consultation, 74 letters of objection have been received including a Heritage Report by KM Heritage Consultants. The main points of objection have been summarised and addressed below.
161. Objection - The proposed development is unacceptable in terms of its design and would not fit in with the Conservation Area.

**Response** – The proposed redevelopment retains the important, historic façades whilst extending the existing building with a newly built vertical extension which is considered to be a high standard of design that would enhance the setting of the conservation area. The modifications to the fourth gable are considered to be minimal, high quality and would preserve the character of the building.

162. Objection - The consultation undertaken for the proposed development has been inadequate.

**Response** – The applicant undertook consultation prior to submission of the application and the council has since undertaken two rounds of statutory consultation as part of the planning application by way of neighbour letters, site notices and press notices. The applicant stated that they have offered to engage further with residents since the submission of the revisions in October.

163. Objection - The existing building is pleasant and makes a positive contribution to the Conservation Area. The proposed building will result in the loss of this building and would not be a benefit to the area.

**Response** – The proposal would restore the facades of the existing building, enhancing its contribution to the immediate streetscene.

164. Objection - The existing building houses community scale businesses and social projects including projects that help the homeless and these will be lost in order to provide more office space which is not what the area needs.

**Response** – The application site lies within the Central Activities Zone and the re-provision and enlargement of B1 office floorspace with high quality, modern and flexible office accommodation is welcomed as a significant benefit of the scheme in accordance with adopted local and regional policy and meets the Core Strategy objective of increasing the number of jobs in Southwark. Furthermore, the development would provide new affordable workspace that could be used by small scale businesses and start-ups.

165. Objection – Glasshill Studios has been given no consideration in the committee report.

**Response** – The impact on Glasshill Studios has been fully considered, assessed and reported.

166. Objection – Glasshill Studios have not been consulted on the proposed development.

**Response** – Glasshill Studios have been fully consulted on both rounds of formal consultation undertaken by the council.

167. Objection – A bespoke arrangement should be agreed with Glasshill Studios with regards to servicing and construction management.

**Response** - It is noted that Glasshill Studios includes rehearsal space at ground floor level. Concerns have been raised by the current operator that the rehearsal space would be subject to unacceptable and ongoing disturbance as a result of both demolition/construction and the operation of the completed development. The operator of Glasshill Studios considers that these impacts would detrimentally harm their business. Whilst it is noted that all new developments entail a degree of disturbance during the construction period which is largely unavoidable if development is to take place, these impacts can be reduced, managed and mitigated through the implementation of a Demolition/Construction Environmental Management Plan, a

Construction Logistics Plan and a Service Management Plan. These plans would be required by planning condition should consent be granted and the details of the plans would be considered in full consultation with the council's Environmental Protection Team.

168. Objection - Demolition of the existing building should not be supported and its loss would have an adverse impact on the Conservation Area.

**Response** – Following amendments to the scheme, all facades would be retained/restored with minor modifications in order to increase the size of the openings and provide a new entrance. As such the development would preserve and enhance the character of the conservation area.

169. Objection - The proposed development is contrary to the Southwark Plan, which includes a general presumption in favour of protecting those buildings that support the character and appearance of Conversation Areas.

**Response** – The proposal is compliant with The Southwark Plan and the King's Bench Conservation Area Appraisal as it protects a building which is considered to make a positive contribution to the conservation area.

170. Objection - The proposed building is excessive in scale, height and massing and would dominate the surrounding streets and neighbouring buildings.

**Response** - The height, scale and massing is considered to be contextually appropriate and would reinforce the historic pattern of development that characterises the King's Bench Conservation Area as well as reflecting the larger scale or newer buildings competed or under construction..

171. Objection - The development would have an unacceptable impact on neighbouring properties daylight/sunlight, privacy and overlooking.

**Response** - The daylight and sunlight assessment was undertaken based on the originally submitted plans. The subsequent amendment to the scheme resulted in the upper floors of the building having a deeper set back from the site boundaries and as such the daylight and sunlight results would represent a worst-case scenario as the impacts would likely be reduced as a result of the amended scheme. Overall, the impacts on daylight are limited and are considered acceptable taking into account the existing tight knit urban grain of the immediate locality, the fact that the residual VSC levels would be conversant with those typically found in urbanised locations, and the benefits that would be brought forward from developing the site including the uplift in employment floorspace and jobs as well as the provision of high quality office accommodation. These issues are considered in more detail in the '*Impact of proposed development on amenity of adjoining occupiers and surrounding area*' section of the main report.

172. Objection - Noise levels would increase and local residents would be subjected to increased disturbance.

**Response** - A flexible use is sought for the ground floor and basement meaning that the end user is not yet defined. As such the space could be used as a retail unit, restaurant, office space or a Class D1/D2 use which could include a gym, training establishment or health facility. As such, the councils Environmental Protection Team have recommended a series of conditions aimed at protecting amenity for adjacent occupiers in order to minimise disturbance from noise and odours. The relevant

conditions will be imposed on any consent issued and will need to be satisfied prior to any development taking place.

173. Objection - The daylight and sunlight report submitted by GL Hearn is flawed and should not be relied upon. The BRE guidance makes it clear that the use of the MMS is appropriate only in order to ensure that a proposed development does not affect the development of adjoining land and this is plainly not the context in which it has been used in this case as Newspaper House is already developed.

**Response** – Officers have reviewed the conclusions of the Daylight and Sunlight Report and have considered the individual results when assessing the application. Furthermore, officers are satisfied that the Mirror Massing test has been employed in an appropriate way in line with the BRE guidance.

174. Objection - There are technical deficiencies with the application. It should never have been validated as there is no heritage assessment provided. This is in breach of the council's own validation requirements and para 128 of NPPF which requires applicants to describe the significance of any heritage assets. The DAS fails to address this as does the planning statement.

**Response** – Heritage impacts have been dealt with fully in the Design and Access Statement and as such the application is not considered to be deficient and a stand alone Heritage Statement would not be required as the matter is dealt with in the submission documents.

175. Objection - The site notices posted at the site did not contain the date the consultation period commenced or expired.

**Response** – Site notices were posted at the site as well as neighbour letters and press notices. This exercise was then repeated as part of the re-consultation exercise. As such the council has met statutory obligations with regards to neighbour consultations.

176. Objection - The planned building will destroy an area worth protecting in terms of architecture, scale and local character and that the plan runs counter to the aim of the King's Bench Conservation Area.

**Response** – The proposed development will retain and restore the important facades and will preserve the character of the conservation area. The scale and massing of the proposed building is contextually appropriate given the existing and emerging schemes.

177. Objection - The proposed building is effectively six storeys and would be out of scale with the urban block running along the whole street that has a two and three storey character and also runs counter to the consistency of materials, both features forming the heart of the conservation area.

**Response** – The proposed building is five storeys with the fifth storey being set back and a plant enclosure on the roof. The contextual elevations show that this height would be consistent with other schemes on Rushworth Street and only marginally taller than the newer developments on King's Bench Street.

178. Objection - The proposed public realm improvements are outside the ownership of the applicant and do not represent a meaningful public benefit that could in any way compensate for the harm caused by demolishing the existing building and constructing

the proposed building.

**Response** – The public realm improvement works, whilst outside of the red line, can be secured by a S.78 agreement and would improve the appearance of King’s Bench Street and Rushworth Street.

179. Objection - The granting of planning permission to build new office developments to the west along Rushworth Street, is irrelevant as it falls outside the CA and should not set a precedent for the new proposed development within it.

**Response** – Whilst the approved developments on Rushworth Street sit outside of the conservation area they do form part of the immediate context of the application site and as such their scale, massing and appearance is relevant.

180. Objection - This application is objectionable because it exacerbates the social cleansing that has blighted the area in recent times.

**Response** – The application will replace commercial space with an increase quantum of commercial space, offering more employment opportunities.

181. Objection - Local infrastructure and services are not sufficient to cope with such a large development.

**Response** – The applicant will have to pay the Community Infrastructure levy towards infrastructure improvement within the local area. A scheme of this size is not anticipated to have significant impacts on local infrastructure.

182. Objection - The proposed development does not propose any ecological benefits and would have an adverse impact on ecology and biodiversity.

**Response** – This scheme would have a neutral impact on ecology and biodiversity as there is no ecological/biodiverse value in the existing building. As part of the proposed scheme, a condition has been imposed to secure the provision of three House Sparrow terraces

183. Objection - The proposal disregards the need for more social housing in the area.

**Response** - The London Plan has an expectation that commercial development within the CAZ will include an element of housing however this policy should be interpreted flexibly and given the small size of the application site it is considered that the inclusion of housing would compromise the ability to retain the facades and maximise employment floorspace.

184. Objection - The sewerage system supporting this part of Blackfriars cannot cope. The existing fatberg at the junction of Webber Street and Blackfriars Road is extensive and has been directly caused by the onset of development approved by the council.

**Response** – Thames Water have been consulted on the application and have raised no objections to the proposal subject to conditions.

185. Objection - The proposed demolition and construction works could affect local businesses including the rehearsal space at Glasshill Studios.

**Response** – All development within central London will cause some element of disturbance to immediate neighbours and this is largely unavoidable in order for development to take place. However, whilst demolition and construction can cause a degree of disturbance, it is considered that these temporary impacts can be adequately mitigated by conditions. As such a Demolition/Construction Environmental

Management Plan and a Construction Logistics Plan will be secured by way of planning condition on any consent issued.

186. Objection - The King's Bench Street pavements are very narrow and cannot accommodate retail or office entrances.

**Response** – Narrow pavements and streets are a key feature of the conservation area and should be retained as set out in the Conservation Area Appraisal

187. Objection - The proposed materials do not relate to the historic context of the conservation area and the design is simply a glass box above a retained facade which is crude and not of a sufficient quality for the location.

**Response** - The new additions to the building, notably the vertical extensions, would create a lightweight and modern addition to the building with metal and glazing offering clean lines and a pleasing contrast with the retained facades and adjacent new developments that employ brickwork as the primary material.

188. Objection - Any development approved on this site should come with an obligation to replace the remaining pavements on Rushworth Street especially outside the student accommodation, Academy costumes and Ripley/Merrow House with York stone slabs to match those outside recent developments. The slabs which have not been replaced are eyesores and in many cases loose and dangerous.

**Response** – This will be secured by way of a S.278 Highways Agreement.

189. Objection - The demolition of the 1916 Newspaper House and the adaptation of 38-40 Glasshill Street have already destroyed some characteristic historic buildings and 33-38 Rushworth Street is the best example and should be reserved intact.

**Response** - The proposed development is considered to be of a high standard of design which retains the historic façade of the existing building.

190. Objection – The development would result in air quality impacts and air pollution.

**Response** – Air quality issues during construction would be mitigated through the implementation of a Construction Management Plan.

191. Objection – The development would lead to dark, narrow and unwelcoming streets.

**Response** - Narrow pavements and streets are a key feature of the conservation area and should be retained as set out in the Conservation Area Appraisal. Taking into account the site orientation and the scale of the adjacent developments, the proposal would not result in daylight impacts to streets that would make them unwelcoming.

192. Objection - The 2010 decision of Southwark Council to extend the King's Bench Conservation Area included the area where the site is situated and specifically referenced 33-38 Rushworth Street, among other buildings, as a key unlisted building which contributes positively to the character and appearance of the Conservation Area. The loss of this building should therefore be resisted as it does not comply with the council planning policies or the Conservation Area Appraisal.

**Response** – As set out above, the proposed development is considered to be of a high standard of design which retains the historic façade of the existing building.

193. Objection - The applicant has provided no information about the negative acoustic impact of the development.

**Response** - A flexible use is sought part of the ground floor and basement meaning that the end user is not yet defined. As such the space could be used as a retail unit, restaurant, office space or a Class D1/D2 use which could include a gym, training establishment or health facility. As such, the council's Environmental Protection Team have recommended a series of conditions aimed at protecting amenity for adjacent occupiers in order to minimise disturbance from noise and odours. The relevant conditions will be imposed on any consent issued and will need to be satisfied prior to any development taking place.

### Human rights implications

194. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
195. This application has the legitimate aim of providing a mixed-use commercial development. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

### BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1445-33 Application file: 17/AP/4289 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5365 Council website: www.southwark.gov.uk

### APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation

## AUDIT TRAIL

<b>Lead Officer</b>	Simon Bevan, Director of Planning	
<b>Report Author</b>	Terence McLellan, Team Leader Planning	
<b>Version</b>	Final	
<b>Dated</b>	30 June 2020	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>		1 July 2020



**APPENDIX 1****Consultation undertaken**

**Site notice date:** 06/02/2018 and 21/11/2019

**Press notice date:** 15/02/2018 and 21/11/2019

**Case officer site visit date:** 06/02/2018 and 21/11/2019

**Neighbour consultation letters sent:** 08/02/2018 and 22/11/2019

**Internal services consulted**

Flood Risk Management & Urban Drainage  
 Highways Licensing  
 Highways Development and Management  
 Waste Management  
 Ecology  
 Archaeology  
 Design and Conservation Team [Formal]  
 Urban Forester  
 Archaeology  
 Design and Conservation Team [Formal]  
 Ecology  
 Highways Development and Management  
 Highways Licensing  
 Flood Risk Management & Urban Drainage  
 Waste Management

**Statutory and non-statutory organisations**

Metropolitan Police Service (Designing O  
 Environment Agency  
 Thames Water  
 Transport for London  
 Network Rail  
 Great London Authority  
 EDF Energy

London Fire & Emergency Planning Authori  
 London Underground  
 Metropolitan Police Service (Designing O  
 Natural England - London & South East Re

Planning Policy

Thames Water

London Underground  
 London Fire & Emergency Planning Authori  
 Natural England - London & South East Re  
 Environment Agency

EDF Energy

Environment Agency  
Great London Authority

London Fire & Emergency Planning Authority  
London Underground  
Natural England - London & South East Region  
Network Rail  
Planning Policy  
Metropolitan Police Service (Designing Out Crime)  
Transport for London

Thames Water

**Neighbour and local groups consulted:**

Flat 4 59 Webber Street London	Flat 4 Newspaper House 40 Rushworth Street
Flat 5 59 Webber Street London	Flat 5 Newspaper House 40 Rushworth Street
Flat 6 59 Webber Street London	Flat 6 Newspaper House 40 Rushworth Street
Flat 1 59 Webber Street London	Excluding Part Ground And Part First Floor 1 Rushworth Street London
Flat 2 59 Webber Street London	Flat 1 96 Webber Street London
Flat 3 59 Webber Street London	Flat 2 96 Webber Street London
Flat 10 59 Webber Street London	Unit A Newspaper House 40 Rushworth Street
Flat 11 59 Webber Street London	Unit B Newspaper House 40 Rushworth Street
Flat 12 59 Webber Street London	Part Ground And Part First Floor 1 Rushworth Street London
Flat 7 59 Webber Street London	Flat 10 Clandon Buildings Boyfield Street
Flat 8 59 Webber Street London	Flat 11 Clandon Buildings Boyfield Street
Flat 9 59 Webber Street London	Flat 12 Clandon Buildings Boyfield Street
94 Webber Street London SE1 0QN	Flat 9 Ripley House Rushworth Street
Friars Primary School Webber Street London	Flat 1 Stopher House 90 Webber Street
Unit 9 33 Rushworth Street London	Flat 1 Clandon Buildings Boyfield Street
Unit 12 33 Rushworth Street London	Flat 5 Clandon Buildings Boyfield Street
Flat 8 Clandon Buildings Boyfield Street	Flat 6 Clandon Buildings Boyfield Street
Flat 9 Clandon Buildings Boyfield Street	Flat 7 Clandon Buildings Boyfield Street
Flat 16 Stopher House 90 Webber Street	1 St Georges Cottages Glasshill Street London
Unit 11 33 Rushworth Street London	2 St Georges Cottages Glasshill Street London
Unit 7 33 Rushworth Street London	33 Rushworth Street London SE1 0RB
35-37 Rushworth Street London SE1 0RB	17 Rushworth Street London SE1 0RB
1-3 Kings Bench Street London SE1 0QX	Unit 8 33 Rushworth Street London
Unit 17 33 Rushworth Street London	30 Kings Bench Street London SE1 0QX
Flat 6 Stopher House 90 Webber Street	Unit 14 33 Rushworth Street London
Flat 7 Stopher House 90 Webber Street	Unit 15 33 Rushworth Street London
Flat 8 Stopher House 90 Webber Street	Unit 16 33 Rushworth Street London
Flat 3 Stopher House 90 Webber Street	20 Rushworth Street London SE1 0RB
Flat 4 Stopher House 90 Webber Street	65 Glasshill Street London SE1 0QR
Flat 5 Stopher House 90 Webber Street	
Flat 12 Stopher House 90 Webber Street	
Flat 13 Stopher House 90 Webber Street	
Flat 14 Stopher House 90 Webber Street	
Flat 9 Stopher House 90 Webber Street	
Flat 10 Stopher House 90 Webber Street	
Flat 11 Stopher House 90 Webber Street	
Flat 9 Newspaper House 40 Rushworth Street	

Newspaper House 65 Webber Street  
 London  
 Unit 23 33 Rushworth Street London  
 14 Rushworth Street London SE1 0RB  
 Unit 21 33 Rushworth Street London  
 18 Pocock Street London SE1 0BW  
 Second Floor 61 Webber Street London  
 Ground Floor Studio 63 Webber Street  
 London  
 Rushworth And Friars Primary School  
 Webber Street London  
 20 Pocock Street London SE1 0BW  
 Flat 20 Stopher House 90 Webber Street  
 Flat 21 Stopher House 90 Webber Street  
 Flat 15 Stopher House 90 Webber Street  
 Flat 17 Stopher House 90 Webber Street  
 Flat 18 Stopher House 90 Webber Street  
 Flat 25 Stopher House 90 Webber Street  
 Flat 26 Stopher House 90 Webber Street  
 Flat 27 Stopher House 90 Webber Street  
 Flat 22 Stopher House 90 Webber Street  
 Flat 23 Stopher House 90 Webber Street  
 Flat 24 Stopher House 90 Webber Street  
 Flat 57 Stopher House 90 Webber Street  
 Flat 58 Stopher House 90 Webber Street  
 Flat 59 Stopher House 90 Webber Street  
 Flat 54 Stopher House 90 Webber Street  
 Flat 55 Stopher House 90 Webber Street  
 Flat 56 Stopher House 90 Webber Street  
 Global House 96-108 Great Suffolk Street  
 London  
 96 Webber Street London SE1 0QN  
 Flat 30 Patrick Court 92 Webber Street  
 Flat 25 Patrick Court 92 Webber Street  
 Flat 26 Patrick Court 92 Webber Street  
 Flat 27 Patrick Court 92 Webber Street  
 Flat 18 Patrick Court 92 Webber Street  
 Flat 9 Patrick Court 92 Webber Street  
 Flat 10 Patrick Court 92 Webber Street  
 Flat 11 Patrick Court 92 Webber Street  
 Flat 6 Patrick Court 92 Webber Street  
 Flat 7 Patrick Court 92 Webber Street  
 Flat 8 Patrick Court 92 Webber Street  
 Flat 15 Patrick Court 92 Webber Street  
 Flat 16 Patrick Court 92 Webber Street  
 Flat 17 Patrick Court 92 Webber Street  
 Flat 12 Patrick Court 92 Webber Street  
 Flat 13 Patrick Court 92 Webber Street  
 Flat 14 Patrick Court 92 Webber Street  
 Flat 47 Patrick Court 92 Webber Street  
 Flat 48 Patrick Court 92 Webber Street  
 Flat 49 Patrick Court 92 Webber Street  
 2 Bench Apartments 22 Kings Bench Street  
 London  
 Flat 3 94 Webber Street London  
 Flat 4 94 Webber Street London  
 Friars Court Rushworth Street London

Unit 10 33 Rushworth Street London  
 Unit 13 33 Rushworth Street London  
 Unit 19 33 Rushworth Street London  
 7A Kings Bench Street London SE1 0QX  
 7B Kings Bench Street London SE1 0QX  
 Middle Floor Flat Alphege House 2 Pocock  
 Street  
 Flat 14 59 Webber Street London  
 Unit 20 33 Rushworth Street London  
 Unit 22 33 Rushworth Street London  
 Unit 24 33 Rushworth Street London  
 Ground Floor Pegasus House 90-94 Great  
 Suffolk Street  
 First Floor To Fourth Floor Pegasus House  
 90-94 Great Suffolk Street  
 30 Rushworth Street London SE1 0RB  
 14 Bench Apartments 22 Kings Bench Street  
 London  
 15 Bench Apartments 22 Kings Bench Street  
 London  
 16 Bench Apartments 22 Kings Bench Street  
 London  
 Flat 3 Patrick Court 92 Webber Street  
 Flat 4 Patrick Court 92 Webber Street  
 Flat 5 Patrick Court 92 Webber Street  
 24 Kings Bench Street London SE1 0QX  
 Flat 32 Sharpley Court 8A Pocock Street  
 Flat 23 Sharpley Court 8A Pocock Street  
 Flat 24 Sharpley Court 8A Pocock Street  
 Flat 25 Sharpley Court 8A Pocock Street  
 Flat 20 Sharpley Court 8A Pocock Street  
 Flat 21 Sharpley Court 8A Pocock Street  
 Flat 22 Sharpley Court 8A Pocock Street  
 Flat 29 Sharpley Court 8A Pocock Street  
 Flat 30 Sharpley Court 8A Pocock Street  
 Flat 31 Sharpley Court 8A Pocock Street  
 Flat 26 Sharpley Court 8A Pocock Street  
 Flat 27 Sharpley Court 8A Pocock Street  
 Flat 28 Sharpley Court 8A Pocock Street  
 6 Eliza House 38 Glasshill Street London  
 7 Eliza House 38 Glasshill Street London  
 8 Eliza House 38 Glasshill Street London  
 3 Eliza House 38 Glasshill Street London  
 4 Eliza House 38 Glasshill Street London  
 5 Eliza House 38 Glasshill Street London  
 Flat 75 Patrick Court 92 Webber Street  
 First Floor 20 Kings Bench Street London  
 Ground Floor 20 Kings Bench Street London  
 Flat 68 Patrick Court 92 Webber Street  
 Flat 59 Patrick Court 92 Webber Street  
 Flat 60 Patrick Court 92 Webber Street  
 Flat 61 Patrick Court 92 Webber Street  
 Flat 56 Patrick Court 92 Webber Street  
 Flat 57 Patrick Court 92 Webber Street  
 Flat 58 Patrick Court 92 Webber Street  
 Flat 65 Patrick Court 92 Webber Street  
 Flat 66 Patrick Court 92 Webber Street

Flat 67 Patrick Court 92 Webber Street  
 Flat 62 Patrick Court 92 Webber Street  
 Flat 63 Patrick Court 92 Webber Street  
 Flat 64 Patrick Court 92 Webber Street  
 Flat 11 Sharpley Court 8A Pocock Street  
 Flat 12 Sharpley Court 8A Pocock Street  
 Flat 13 Sharpley Court 8A Pocock Street  
 Flat 2 Stopher House 90 Webber Street  
 Flat 16 59 Webber Street London  
 Flat 17 59 Webber Street London  
 Flat 18 59 Webber Street London  
 Flat 12A 59 Webber Street London  
 Flat 12B 59 Webber Street London  
 Flat 15 59 Webber Street London  
 Flat 22 59 Webber Street London  
 St Alphege Church Kings Bench Street  
 London  
 50 Rushworth Street London SE1 0RB  
 Flat 19 59 Webber Street London  
 Flat 20 59 Webber Street London  
 Flat 21 59 Webber Street London  
 Flat 10 Merrow House Rushworth Street  
 Flat 11 Merrow House Rushworth Street  
 Flat 12 Merrow House Rushworth Street  
 5 Kings Bench Street London SE1 0QX  
 Flat 1 Merrow House Rushworth Street  
 Flat 5 Merrow House Rushworth Street  
 Flat 6 Merrow House Rushworth Street  
 Flat 7 Merrow House Rushworth Street  
 Flat 2 Merrow House Rushworth Street  
 Flat 3 Merrow House Rushworth Street  
 Flat 4 Merrow House Rushworth Street  
 46 Rushworth Street London SE1 0QN  
 Flat 7 Newspaper House 40 Rushworth  
 Street  
 Flat 2 Clandon Buildings Boyfield Street  
 Flat 3 Clandon Buildings Boyfield Street  
 Flat 4 Clandon Buildings Boyfield Street  
 Flat 8 Ripley House Rushworth Street  
 Flat 10 Ripley House Rushworth Street  
 Flat 11 Ripley House Rushworth Street  
 Flat 12 Ripley House Rushworth Street  
 Flat 8 Merrow House Rushworth Street  
 Flat 9 Merrow House Rushworth Street  
 Flat 1 Ripley House Rushworth Street  
 Flat 5 Ripley House Rushworth Street  
 Flat 6 Ripley House Rushworth Street  
 Flat 7 Ripley House Rushworth Street  
 Flat 2 Ripley House Rushworth Street  
 Flat 3 Ripley House Rushworth Street  
 Flat 4 Ripley House Rushworth Street  
 Manna House 8-20 Pocock Street London  
 Flat A Alphege House 2 Pocock Street  
 Flat B Alphege House 2 Pocock Street  
 59A Webber Street London SE1 0RF  
 St Alphege Clergy House Pocock Street  
 London  
 The Convent 48 Rushworth Street London  
 3A St Georges Cottages Glasshill Street  
 London  
 3B St Georges Cottages Glasshill Street  
 London  
 3C St Georges Cottages Glasshill Street  
 London  
 Studio 2 63 Webber Street London  
 First Floor 61 Webber Street London  
 3 Kings Bench Street London SE1 0QX  
 Newspaper House Kings Bench Street  
 London  
 Ground Floor 24-28 Rushworth Street  
 London  
 3D St Georges Cottages Glasshill Street  
 London  
 4 St Georges Cottages Glasshill Street  
 London  
 5 St Georges Cottages Glasshill Street  
 London  
 37 Rushworth Street London SE1 0RB  
 Studio 1 63 Webber Street London  
 Ground Floor 61 Webber Street London  
 First Floor 24-28 Rushworth Street London  
 Second Floor 24-28 Rushworth Street  
 London  
 Third Floor 24-28 Rushworth Street London  
 Flat 32 Stopher House 90 Webber Street  
 Flat 33 Stopher House 90 Webber Street  
 Flat 34 Stopher House 90 Webber Street  
 Flat 29 Stopher House 90 Webber Street  
 Flat 30 Stopher House 90 Webber Street  
 Flat 31 Stopher House 90 Webber Street  
 Flat 38 Stopher House 90 Webber Street  
 Flat 39 Stopher House 90 Webber Street  
 Flat 40 Stopher House 90 Webber Street  
 Flat 35 Stopher House 90 Webber Street  
 Flat 36 Stopher House 90 Webber Street  
 Flat 37 Stopher House 90 Webber Street  
 Flat 28 Stopher House 90 Webber Street  
 Flat 19 Stopher House 90 Webber Street  
 21 Rushworth Street London SE1 0RB  
 Flat 60 Stopher House 90 Webber Street  
 15-16 Rushworth Street London SE1 0RB  
 82 Great Suffolk Street London SE1 0BE  
 Flat 53 Stopher House 90 Webber Street  
 Flat 44 Stopher House 90 Webber Street  
 Flat 45 Stopher House 90 Webber Street  
 Flat 46 Stopher House 90 Webber Street  
 Flat 41 Stopher House 90 Webber Street  
 Flat 42 Stopher House 90 Webber Street  
 Flat 43 Stopher House 90 Webber Street  
 Flat 50 Stopher House 90 Webber Street  
 Flat 51 Stopher House 90 Webber Street  
 Flat 52 Stopher House 90 Webber Street  
 Flat 47 Stopher House 90 Webber Street  
 Flat 48 Stopher House 90 Webber Street

Flat 49 Stopher House 90 Webber Street  
 Flat 3 Newspaper House 40 Rushworth Street  
 Flat 22 Patrick Court 92 Webber Street  
 Flat 23 Patrick Court 92 Webber Street  
 Flat 24 Patrick Court 92 Webber Street  
 Flat 19 Patrick Court 92 Webber Street  
 Flat 20 Patrick Court 92 Webber Street  
 Flat 21 Patrick Court 92 Webber Street  
 Flat 28 Patrick Court 92 Webber Street  
 Flat 29 Patrick Court 92 Webber Street  
 Flat 44 Patrick Court 92 Webber Street  
 Flat 45 Patrick Court 92 Webber Street  
 Flat 46 Patrick Court 92 Webber Street  
 Flat 53 Patrick Court 92 Webber Street  
 Flat 54 Patrick Court 92 Webber Street  
 Flat 55 Patrick Court 92 Webber Street  
 Flat 50 Patrick Court 92 Webber Street  
 Flat 51 Patrick Court 92 Webber Street  
 Flat 52 Patrick Court 92 Webber Street  
 Flat 43 Patrick Court 92 Webber Street  
 Flat 34 Patrick Court 92 Webber Street  
 Flat 35 Patrick Court 92 Webber Street  
 Flat 36 Patrick Court 92 Webber Street  
 Flat 31 Patrick Court 92 Webber Street  
 Flat 32 Patrick Court 92 Webber Street  
 Flat 33 Patrick Court 92 Webber Street  
 Flat 40 Patrick Court 92 Webber Street  
 Flat 41 Patrick Court 92 Webber Street  
 Flat 42 Patrick Court 92 Webber Street  
 Flat 37 Patrick Court 92 Webber Street  
 Flat 38 Patrick Court 92 Webber Street  
 Flat 39 Patrick Court 92 Webber Street  
 Flat 1 94 Webber Street London  
 Flat 2 94 Webber Street London  
 1 Bench Apartments 22 Kings Bench Street London  
 Flat 1 Patrick Court 92 Webber Street  
 Flat 2 Patrick Court 92 Webber Street  
 13 Bench Apartments 22 Kings Bench Street London  
 6 Bench Apartments 22 Kings Bench Street London  
 7 Bench Apartments 22 Kings Bench Street London  
 8 Bench Apartments 22 Kings Bench Street London  
 3 Bench Apartments 22 Kings Bench Street London  
 4 Bench Apartments 22 Kings Bench Street London  
 5 Bench Apartments 22 Kings Bench Street London  
 9 Bench Apartments 22 Kings Bench Street London  
 10 Bench Apartments 22 Kings Bench Street London  
 11 Bench Apartments 22 Kings Bench Street London  
 Flat 36 Sharpley Court 8A Pocock Street  
 Unit 101 Foundry Annexe 65 Glasshill Street London  
 Flat 33 Sharpley Court 8A Pocock Street  
 Flat 34 Sharpley Court 8A Pocock Street  
 Flat 35 Sharpley Court 8A Pocock Street  
 18-19 Rushworth Street London SE1 0RB  
 12 Rushworth Street London SE1 0RB  
 Unit 103 Foundry Annexe 65 Glasshill Street London  
 Church Hall St Alphege Church Kings Bench Street  
 Flat 1 Newspaper House 40 Rushworth Street  
 Flat 2 Newspaper House 40 Rushworth Street  
 28 Glasshill Street London SE1 0QR  
 28A Glasshill Street London SE1 0QR  
 40 Kings Bench Street London SE1 0QX  
 2 Eliza House 38 Glasshill Street London  
 Apartment 4 10 Rushworth Street London  
 Apartment 5 10 Rushworth Street London  
 Apartment 6 10 Rushworth Street London  
 Apartment 1 10 Rushworth Street London  
 Apartment 2 10 Rushworth Street London  
 Apartment 3 10 Rushworth Street London  
 9 Rushworth Street London SE1 0RB  
 1 Eliza House 38 Glasshill Street London  
 Apartment 7 10 Rushworth Street London  
 Apartment 8 10 Rushworth Street London  
 Apartment 9 10 Rushworth Street London  
 Flat 72 Patrick Court 92 Webber Street  
 Flat 73 Patrick Court 92 Webber Street  
 Flat 74 Patrick Court 92 Webber Street  
 Flat 69 Patrick Court 92 Webber Street  
 Flat 70 Patrick Court 92 Webber Street  
 Flat 71 Patrick Court 92 Webber Street  
 84 Great Suffolk Street London SE1 0BE  
 86-88 Great Suffolk Street London SE1 0BE  
 Workshop Stopher House 90 Webber Street  
 Flat 8 Sharpley Court 8A Pocock Street  
 Flat 9 Sharpley Court 8A Pocock Street  
 Flat 10 Sharpley Court 8A Pocock Street  
 Flat 17 Sharpley Court 8A Pocock Street  
 Flat 18 Sharpley Court 8A Pocock Street  
 Flat 19 Sharpley Court 8A Pocock Street  
 Flat 14 Sharpley Court 8A Pocock Street  
 Flat 15 Sharpley Court 8A Pocock Street  
 Flat 16 Sharpley Court 8A Pocock Street  
 Flat 7 Sharpley Court 8A Pocock Street  
 Second Floor Global House 96-108 Great Suffolk Street  
 Third Floor Global House 96-108 Great Suffolk Street

Ground Floor Global House 96-108 Great  
Suffolk Street  
First Floor Global House 96-108 Great  
Suffolk Street  
Flat 4 Sharpley Court 8A Pocock Street  
Flat 5 Sharpley Court 8A Pocock Street

Flat 6 Sharpley Court 8A Pocock Street  
Flat 1 Sharpley Court 8A Pocock Street  
Flat 2 Sharpley Court 8A Pocock Street  
Flat 3 Sharpley Court 8A Pocock Street

**Re-consultation:**

**APPENDIX 2****Consultation responses received****Internal services**

Ecology  
 Archaeology  
 Urban Forester  
 Archaeology  
 Ecology  
 Highways Development and Management

**Statutory and non-statutory organisations**

Metropolitan Police Service (Designing O  
 London Underground  
 Metropolitan Police Service (Designing O  
 Natural England - London & South East Re  
 Thames Water

London Underground  
 London Fire & Emergency Planning Authori  
 Natural England - London & South East Re  
 Environment Agency

**Neighbour and local groups consulted:**

Flat 8 Newspaper House 40 Rushworth  
 Street  
 Rushworth Street 40 Southwark/ London  
 SE10RB  
 Flat 10, Bench Apartments 22 Kings Bench  
 St London  
 Shardeloes Road 50D New Cross/ London  
 SE146SL  
 Flat 8 115 Brandon Street London  
 8 Ripley House London SE1 0RA  
 Flat 7 Newspaper House 40 Rushworth  
 Street London  
 9 Newspaper House 40 Rushworth Street  
 London  
 6, Eliza House 38-40 Glasshill Street London  
 Flat 5 22 King's Bench Street London  
 Flat 6, Newspaper House 40 Rushworth  
 Street London  
 Raleigh Rotherhithe SE165GB  
 Flat 5 22 King's Bench Street London  
 11 Bench Apts 22 King's Bench St  
 Southwark  
 Flat 11 Bench Apartments 22 Kings Bench  
 Street London  
 Bridge Cottage Bridge Road Lymington

8 Bench Apartments 22 King's Bench Street  
 London  
 50, Hartfield Crescent Wimbledon SW19  
 3SD  
 42 Mill Road Epsom KT174AR  
 70 Golden Avenue W.Sussex BN161QU  
 Flat 12 Bench Apartments 22 Kings Bench  
 Street London  
 Flat 1, Newspaper House 40 Rushworth  
 Street Southwark, London  
 Flat 1, Newspaper House 40 Rushworth  
 Street London  
 Apartment 1 10 Rushworth Street London  
 Newspaper House 40 Rushworth Street  
 London  
 Glasshill Studios Kings Bench Street London  
 Apartment 9 40 Rushworth Street London  
 94 Webber Street London SE1 0QN  
 8 Eliza House 38 Glasshill Street London  
 2, Rushworth Studios, 63 Weeber Street  
 London  
 Flat 3 40 Rushworth Street London  
 2 Eliza House 38 Glasshill Street London  
 Flat 3, Newspaper House Rushworth Street,  
 London

Flat 3 Newspaper House 40 Rushworth Street London  
 12 Bench Apartments 22 Kings Bench Street London  
 12 Rushworth Street London SE1 0RB  
 Flat 16, Lefroy House, Collinson Street London SE1 1QE  
 50 Highsett Cambridge CB2 1NZ  
 Flat 8 115 Brandon Street London  
 63 Webber St. London  
 8 Eliza House Southwark SE1 0QR  
 27 Oswin Street London SE11 4TF  
 50 Highsett Cambridge CB21NZ  
 Flat 11 Bench Apts 22 Kings Bench Street Southwark  
 50 Hartfield Crescent London SW19 3SD  
 Flat 4, Newspaper House 40 Rushworth Street London  
 Flat 6 Newspaper House 40 Rushworth Street London  
 Galakidon 11 Athens 111 46  
 3 Raleigh Court Clarence Mews Rotherhithe  
 2 Eliza House 38 Glasshill Street London  
 Flat 10 Bench Apartments 22 Kings Bench Street London  
 Flat 8 Newspaper House 40 Rushworth Street London  
 Flat 16, st peters gardens 332 ladywell road London  
 12 Bench Apartments 22 Kings Bench street London  
 Flat 2 Bench Apartments 22 Kings Bench Street London  
 59 Bunhil Row London EC1Y 8qw  
 94 Webber St London SE1 0QN  
 9 Newspaper House 40 Rushworth Street London  
 Flat 8, Newspaper house Rushworth Street Southwark  
 Galakidon 11 Athens 11146  
 50 Hartfield Crescent LONDON SW19 3SD  
 57 Amberley Road Enfield Middx EN1 2QZ  
 Flat 16, st Peter Gardens 332 Ladywell Road London  
 Flat 9 22 King's Bench Street London  
 12 Bench Apartments 22 Kings Bench Street London  
 Flat 3 Bench Apartments, 22 King's Bench Street London SE1 0QX  
 6 Eliza House 38 Glasshill Street London  
 Flat 9 Newspaper House 40 Rushworth Street London  
 160 Tooley Street SE1  
 160 Tooley Street SE1  
 160 Tooley Street SE1  
 160 Tooley Street SE1

160 Tooley Street SE1  
 160 Tooley Street SE1



## RECOMMENDATION

This document shows the case officer's recommended decision for the application referred to below.  
This document is not a decision notice for this application.

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<b>Applicant</b>	GMS Estates Ltd	<b>Reg. Number</b>	17/AP/4289
<b>Application Type</b>	Major application	<b>Case Number</b>	1445-33
<b>Recommendation</b>	Major - GRANTED		

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### Draft of Decision Notice

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**Planning Permission was GRANTED for the following development:**

Part demolition of existing commercial buildings (Class B1 Business Use) and construction, behind part-retained existing facades, of a part 3, part 4 and part 5 storey building (plus plant enclosure) comprising 3,232m of Class B1 Office/Business floorspace and 1,026m of Class A1 / A3 / B1 / D1 / D2 Use floorspace (retail/restaurant/business/community/leisure use). Associated hard landscaping and public realm (Reconsultation due to design revisions)

33-38 Rushworth Street London SE1 0RB 1-7 King Bench Street SE1

**In accordance with application received on 13 November 2017**

**and Applicant's Drawing Nos.:**

Existing Plans

1435-0100-AP-100 REV PL01; 1435-0100-AP-002 REV PL01; 1435-0100-AP-003 REV PL01; 1435-0100-AP-004 REV PL01; 1435-0100-AP-005 REV PL01; 1435-0100-AP-006 REV PL01; 1435-0100-AP-007 REV PL01. received

Proposed Plans

1435-0200-AP-001 PL02  
 1435-0200-AP-002 PL02  
 1435-0200-AP-003 PL02  
 1435-0200-AP-004 PL02  
 1435-0200-AP-005 PL02  
 1435-0200-AP-006 PL02  
 1435-0200-AP-007 PL02  
 1435-0200-AP-008 PL02  
 1435-0200-AP-010 PL02  
 1435-0300-AP-001 PL02  
 1435-0300-AP-001 PL02  
 1435-0400-AP-001 PL02  
 1435-0400-AP-002 PL02  
 1435-0400-AP-003 PL02  
 1435-0400-AP-004 PL03  
 received

Other Documents

Air Quality Assessment June 2017; BREEAM Ecology Report August 2017; BREEAM Report Stage I November 2017; Daylight and Sunlight Assessment October 2; Design and Access Statement (and addendum); Energy Strategy Statement November 2017; Flood Risk Assessment July 2017; Habitat Management Plan August 2017; Planning Report November 2017; Planning Statement November 2017; Security Risk Management October 2017; Statement of Community Involvement October 2017; Transport Statement November 2017. received

**Time limit for implementing this permission and the approved plans**

**Time limit for implementing this permission and the approved plans**

1. The development hereby permitted shall be begun before the end of three years from the date of this permission.

Reason:

As required by Section 91 of the Town and Country Planning Act 1990 as amended.

2. The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:

1435-0200-AP-001 PL02

1435-0200-AP-002 PL02

1435-0200-AP-003 PL02

1435-0200-AP-004 PL02

1435-0200-AP-005 PL02

1435-0200-AP-006 PL02

1435-0200-AP-007 PL02

1435-0200-AP-008 PL02

1435-0200-AP-010 PL02

1435-0300-AP-001 PL02

1435-0300-AP-001 PL02

1435-0400-AP-001 PL02

1435-0400-AP-002 PL02

1435-0400-AP-003 PL02

1435-0400-AP-004 PL03

Reason:

For the avoidance of doubt and in the interests of proper planning."

**Permission is subject to the following pre-commencements conditions**

3. Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

- 1) A preliminary risk assessment which has identified:

all previous uses

potential contaminants associated with those uses

a conceptual model of the site indicating sources, pathways and receptors

potentially unacceptable risks arising from contamination at the site.

- 2) A site investigation scheme, based on (1) to provide information for a detailed

assessment of the risk to all receptors that may be affected, including those off site. 3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken. 4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

#### Reason

For the protection of Controlled Waters. The site is located over a Secondary Aquifer but no information has been provided to assess the potential for historic land contamination.

4. Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

#### Reason

The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to Controlled Waters.

5. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

6. No works shall commence until suitable investigations are undertaken to determine the ground and groundwater conditions (including levels) at the site and a Basement Impact Assessment (BIA) shall be submitted to and approved in writing by the Local Planning Authority. This should include groundwater flood risk mitigation measures as required, with the measures constructed to the approved details. The BIA shall assess if the lowest level of the basement will be above, or below the groundwater levels recorded from the ground investigations. Additionally, the BIA shall consider fluctuations in groundwater levels and the risks this can pose to the site and shall include a plan of the basement area within the boundary of the site, with any known (investigated) basements and subterranean structures adjacent to the site. This is to see if there may be a risk of obstructing groundwater flows which could potentially cause a build up of pressure on the upstream side of the subterranean structures. Further guidance on preparing BIA can be found in appendix to our SFRA 2016 here: <https://www.southwark.gov.uk/environment/flood-risk-management/strategic-flood-risk-assessment-sfra?chapter=2>

#### Reason:

To minimise the potential for the site to contribute to changes in groundwater conditions

and any subsequent flooding in accordance with the Southwark Strategic Flood Risk Assessment (2016).

7.
  - a) Prior to the commencement of any development, a site investigation and risk assessment shall be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site.
    - i) The Phase 1 (desk study, site categorisation; sampling strategy etc.) shall be submitted to the Local Planning Authority for approval before the commencement of any intrusive investigations.
    - ii) Any subsequent Phase 2 (site investigation and risk assessment) shall be conducted in accordance with any approved scheme and submitted to the Local Planning Authority for approval prior to the commencement of any remediation that might be required.
  - b) In the event that contamination is present, a detailed remediation strategy to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment shall be prepared and submitted to the Local Planning Authority for approval in writing. The scheme shall ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out in accordance with its terms prior to the commencement of development, other than works required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority shall be given two weeks written notification of commencement of the remediation scheme works.
  - c) Following the completion of the works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed shall be submitted to and approved in writing by the Local Planning Authority.
  - d) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-c above.

#### Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007), strategic policy 13' High environmental standards' of the Core Strategy (2011) and the National Planning Policy Framework 2019.

8. Details of house sparrow terraces shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of any part of the development hereby approved. No less than three house sparrow terraces shall be provided and the details shall include the exact location, specification and design of the habitats. The house sparrow terraces shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained and they shall be installed strictly in accordance with the details so approved and shall be maintained as such thereafter. Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the nest/roost features

have been installed to the agreed specification.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: 5.10 and 7.19 of the London Plan 2011, Policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core strategy.

9. No development shall take place, including any works of demolition, until a Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to construction site management and to use all best endeavours to minimise off-site impacts, and will include the following information:

A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;

Site perimeter continuous automated noise, dust and vibration monitoring;

Engineering measures to eliminate or mitigate identified environmental impacts e.g. hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.;

Arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, residents liaison meetings, etc.)

A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme;

Site traffic ' Routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;

Site waste Management ' Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations.

The parking of vehicles of site operatives and visitors;

Loading and unloading of plant and materials;

Storage of plant and materials used in constructing the development;

The erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;

Wheel washing facilities;

Measures to control the emission of dust and dirt during construction;

A scheme for recycling / disposing of waste resulting from demolition and construction works

To follow current best construction practice, the CEMP shall include the following:-

Southwark Council's Technical Guide for Demolition & Construction at

<http://www.southwark.gov.uk/noise-and-antisocial-behaviour/construction-noise>

S61 of Control of Pollution Act 1974,

The London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition',

The Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites',

BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites',

BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration,

BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting,

Relevant EURO emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended & NRMM London

emission standards <http://nrmm.london/>  
 The Party Wall Act 1996  
 Relevant CIRIA practice notes, and  
 BRE practice notes.

All demolition and construction work shall be undertaken in strict accordance with the approved CEMP and other relevant codes of practice, unless otherwise agreed in writing by the Local Planning Authority.

#### Reason

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with Strategic Policy 13 'High environmental standards' of the Core Strategy (2011), Saved Policy 3.2 'Protection of amenity' of the Southwark Plan (2007), and the National Planning Policy Framework (2019).

10. Prior to commencement of development, shop drawings scale 1:5 for all new fenestration, doors, facade, parapet and junctions with existing building shall be submitted to the Local Planning Authority and approved in writing; the development shall not be carried out otherwise than in accordance with any such approval given.

#### Reason:

In order to ensure that the design and details are in the interest of the special architectural interest of the building in accordance with The National Planning Policy Framework 2019, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies: 3.15 Conservation of the Historic Environment; 3.16 Conservation Areas; of The Southwark Plan 2007.

11. Prior to commencement of demolition works, a valid construction contract (under which one of the parties is obliged to carry out and complete the works of redevelopment of the site for which planning permission was granted simultaneously with this consent) shall be entered into and evidence of the construction contract shall be submitted for approval in writing by the Local Planning Authority.

#### Reasons

As empowered by Section 74(3) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and to maintain the character and appearance of the Kings Bench Conservation Area in accordance with The National Planning Policy Framework 2019, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies 3.15 Conservation of the Historic Environment, 3.16 Conservation Areas, and 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites of The Southwark Plan 2007.

12. Prior to works commencing, full details of all proposed planting of three street trees shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections, planting and maintenance specifications, use of guards or other protective measures and confirmation of location, species, sizes, nursery stock type, supplier and defect period. All tree planting shall be carried out in accordance with those details and at those times. Planting shall comply with BS5837: Trees in relation to demolition, design and construction (2012) and BS: 4428 Code of practice for general landscaping operations.

If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place in the first suitable planting season., unless the local planning authority gives its written consent to any variation.

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in accordance with The National Planning Policy Framework 2019; policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

**Permission is subject to the following grade conditions**

13. Before any above grade work hereby authorised begins, details of security measures shall be submitted and approved in writing by the Local Planning Authority and any such security measures shall be implemented prior to occupation in accordance with the approved details which shall seek to achieve the 'Secured by Design' accreditation award from the Metropolitan Police.

**Reason**

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention in accordance with The National Planning Policy Framework 2019, Strategic Policy 12 - Design and conservation of The Core Strategy 2011 and Saved Policy 3.14 Designing out crime of the Southwark plan 2007.

14. The commercial spaces within the development sharing a party wall element with existing neighbouring properties shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that noise due to the use of the premises does not exceed NR20. A written report shall be submitted to and approved by the Local Planning Authority prior to any above grade works taking place. The development shall be carried out in accordance with the approval given. The approved scheme shall be implemented prior to the commencement of the use hereby permitted and shall be permanently maintained thereafter. Following completion of the development and prior to occupation a validation test shall be carried out. The results shall be submitted to the LPA for approval in writing.

**Reason**

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011), saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007) and the National Planning Policy Framework 2019.

15. Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILE) Guidance for the Reduction of Obtrusive Light (January 2012). Details of any external lighting (including: design; power and position of luminaries; light intensity contours) of all affected external areas (including areas beyond the boundary of the development) shall be submitted to and approved by the Local Planning Authority in writing before any such lighting is installed. The development shall not be carried out otherwise in accordance with any such approval given. Prior to the external lighting being commissioned for use a validation report shall be submitted to the LPA for approval in writing.

**Reason**

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with The National Planning Policy Framework

2019, Strategic Policy 12 Design and Conservation and Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.14 Designing out crime of the Southwark Plan 2007.

16. Before any fit out works to the commercial premises hereby authorised begins, an independently verified BREEAM report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum 'very good' for Class A uses and 'excellent' for Class B and D uses shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given; Before the first occupation of the building hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed standards at (a) have been met.

**Reason**

To ensure the proposal complies with The National Planning Policy Framework 2019, Strategic Policy 13 - High Environmental Standards of The Core Strategy 2011 and Saved Policies 3.3 Sustainability and 3.4 Energy Efficiency of the Southwark Plan 2007.

17. Sample panels of all external facing materials including brickwork (brick, bonding, coursing), metal, glazing and cladding materials to be used in the carrying out of this permission shall be made available for inspection on site and approved by the Local Planning Authority in writing before any work in connection with this permission is carried out and the development shall not be carried out otherwise than in accordance with any such approval given.

**Reason:**

In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with The National Planning Policy Framework 2019, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies: 3.12 Quality in Design and 3.13 Urban Design of The Southwark Plan 2007.

18. Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, surfacing materials of any parking, access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.

The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

**Reason**

So that the Council may be satisfied with the details of the landscaping scheme in accordance with The National Planning Policy Framework 2019 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.



19. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

**Reason**

There is always the potential for unexpected contamination to be identified during development groundworks. We should be consulted should any contamination be identified that could present an unacceptable risk to Controlled Waters.

**Permission is subject to the following Pre-Occupation Condition(s)**

20. Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the local planning authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

**Reason**

Should remediation be deemed necessary, the applicant should demonstrate that any remedial measures have been undertaken as agreed and the environmental risks have been satisfactorily managed so that the site is deemed suitable for use.

21. Prior to the commencement of any Class A3 use, full particulars and details of a scheme for the ventilation of the premises to an appropriate outlet level, including details of sound attenuation for any necessary plant and the standard of dilution expected, shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given.

**Reason**

In order to ensure that the ventilation ducting and ancillary equipment will not result in an odour, fume or noise nuisance and will not detract from the appearance of the building in the interests of amenity in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 - High Environmental Standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

22. Prior to the commencement of any A1/A3/D1/D2 uses, a scheme of sound insulation shall be installed to ensure that the LFmax sound from amplified and non-amplified music and speech shall not exceed the lowest L90 5min at 1m from the facade of nearby residential premises at all third octave bands between 63Hz and 8kHz shall be submitted to the local planning authority for written approval. The scheme of sound insulation shall be constructed and installed in accordance with the approval given and shall be permanently maintained thereafter. Following completion of the development and prior to the commencement of use of the commercial premises a validation test shall be carried out. The results shall be submitted to the LPA for approval in writing.

**Reason**

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities associated with non-residential premises in accordance with the National Planning Policy Framework 2019, Strategic Policy 13 'High environmental standards' of the Core Strategy (2011) and saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

23. The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014. Prior to the plant being commissioned a validation test shall be carried out following completion of the development. The results shall be submitted to the LPA for approval in writing. The plant and equipment shall be installed and constructed in accordance with the approval given and shall be permanently maintained thereafter.

**Reason**

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

24. a) Before the first occupation of the building hereby permitted commences the applicant shall submit in writing and obtain the written approval of the Local Planning Authority to a Travel Plan setting out the proposed measures to be taken to encourage the use of modes of transport other than the car by all users of the building, including staff and visitors.
- b) At the start of the second year of operation of the approved Travel Plan a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

**Reason**

In order that the use of non-car based travel is encouraged in accordance with The National Planning Policy Framework 2019, Strategic Policy 2 Sustainable Transport of The Core Strategy 2011 and Saved Policies 5.2 Transport Impacts, 5.3 Walking and Cycling and 5.6 Car Parking of the Southwark Plan 2007.

25. Before the first occupation of the building hereby permitted a Service Management Plan detailing how all elements of the site are to be serviced has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approval given and shall remain for as long as the development is occupied.

**Reason**

To ensure compliance with The National Planning Policy Framework 2019, Strategic Policy 2 Sustainable Transport of The Core Strategy 2011 and Saved Policy 5.2 Transport Impacts of the Southwark Plan 2007.

26. Prior to occupation of any part of the development, details of the arrangements for the storing of refuse shall be submitted to and approved in writing by the Local Planning Authority and the facilities approved shall be provided and made available for use by the occupiers of the dwellings and the facilities shall thereafter be retained and shall not be used or the space used for any other purpose.

## Reason

To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and Policy 3.7 Waste Reduction of The Southwark Plan 2007

**Permission is subject to the following compliance conditions**

27. Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to Controlled Waters. The development shall be carried out in accordance with the approval details.

## Reason

Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

28. Any gas boilers shall meet 'ultra-low NOx' criteria such that the dry NOx emission rate does not exceed 40mg/kWh.

## Reason

To minimise the impact of the development on local air quality within the designated Air Quality Management Area in accordance with Policy 7.14 of the London Plan. 2016

29. Any deliveries, unloading and loading to the commercial units shall only be between the following hours: Monday to Saturday - 08:00 - 20:00, Sundays/ Bank Holidays - 10:00-16:00.

## Reason

To ensure that and occupiers of the development and occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy 201 and Saved Policies 3.2 Protection of Amenity of The Southwark Plan 2007

30. The terraces at 2nd and 3rd floor level shall not be used outside the hours of 09:00 - 17:00 on weekdays and not at all on weekends. The terrace at 4th floor level shall not be used outside the hours of 08:00 - 20:00 Monday to Friday, 10:00-16:00 Saturdays and not at all on Sundays and Bank Holidays. Additionally, no part of the 4th floor terrace as hatched in red on approved drawing 1435-0200-AP-006 Rev PL02 shall be used.

## Reason:

To safeguard the amenities of neighbouring residential properties in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

31. No developer, owner or occupier of any part of the development hereby permitted, with the exception of disabled persons, shall seek, or will be allowed, to obtain a parking permit within the controlled parking zone in Southwark in which the application site is situated.

## Reason

To ensure compliance with Strategic Policy 2 - Sustainable Transport of the Core Strategy

2011 and saved policy 5.2 Transport Impacts of the Southwark Plan 2007.

32. Prior to occupation of any part of the development, the cycle storage facilities shall be provided and thereafter such facilities shall be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason

To ensure that satisfactory safe and secure bicycle parking is provided and retained for the benefit of the users and occupiers of the building in order to encourage the use of alternative means of transport and to reduce reliance on the use of the private car in accordance with The National Planning Policy Framework 2019, Strategic Policy 2 - Sustainable Transport of The Core Strategy and Saved Policy 5.3 Walking and Cycling of the Southwark Plan 2007.

33. Any A1/A3/D1/D2 use hereby permitted shall only be carried out between the hours of 07:00 22:00 on Monday to Friday, 08:00 -22:00 on Saturday, 09:00 ' 18:00 on Sundays and Bank Holidays.

Reason

To safeguard the amenity of neighbouring residential properties in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

34. Notwithstanding the provisions of Parts 24 and 25 The Town & Country Planning [General Permitted Development] Order 1995 [as amended or re-enacted] no external telecommunications equipment or structures shall be placed on the roof or any other part of a building hereby permitted.

Reason

In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with The National Planning Policy Framework 2019, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.13 Urban Design of the Southwark Plan 2007.

35. No roof plant, equipment or other structures, other than as shown on the plans hereby approved or approved pursuant to a condition of this permission, shall be placed on the roof or be permitted to project above the roofline of any part of the building[s] as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosure[s] of any building[s] hereby permitted.

Reason

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with The National Planning Policy Framework 2019, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.13 Urban Design of the Southwark Plan 2007.

### **Statement of positive and proactive action in dealing with the application**

The Council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material

considerations indicate otherwise.

The Council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

The Council commits to negotiating with applicants wherever possible to secure changes and/or additional information to a scheme to make it acceptable. The case officer adopted this approach when bringing this application to a conclusion.

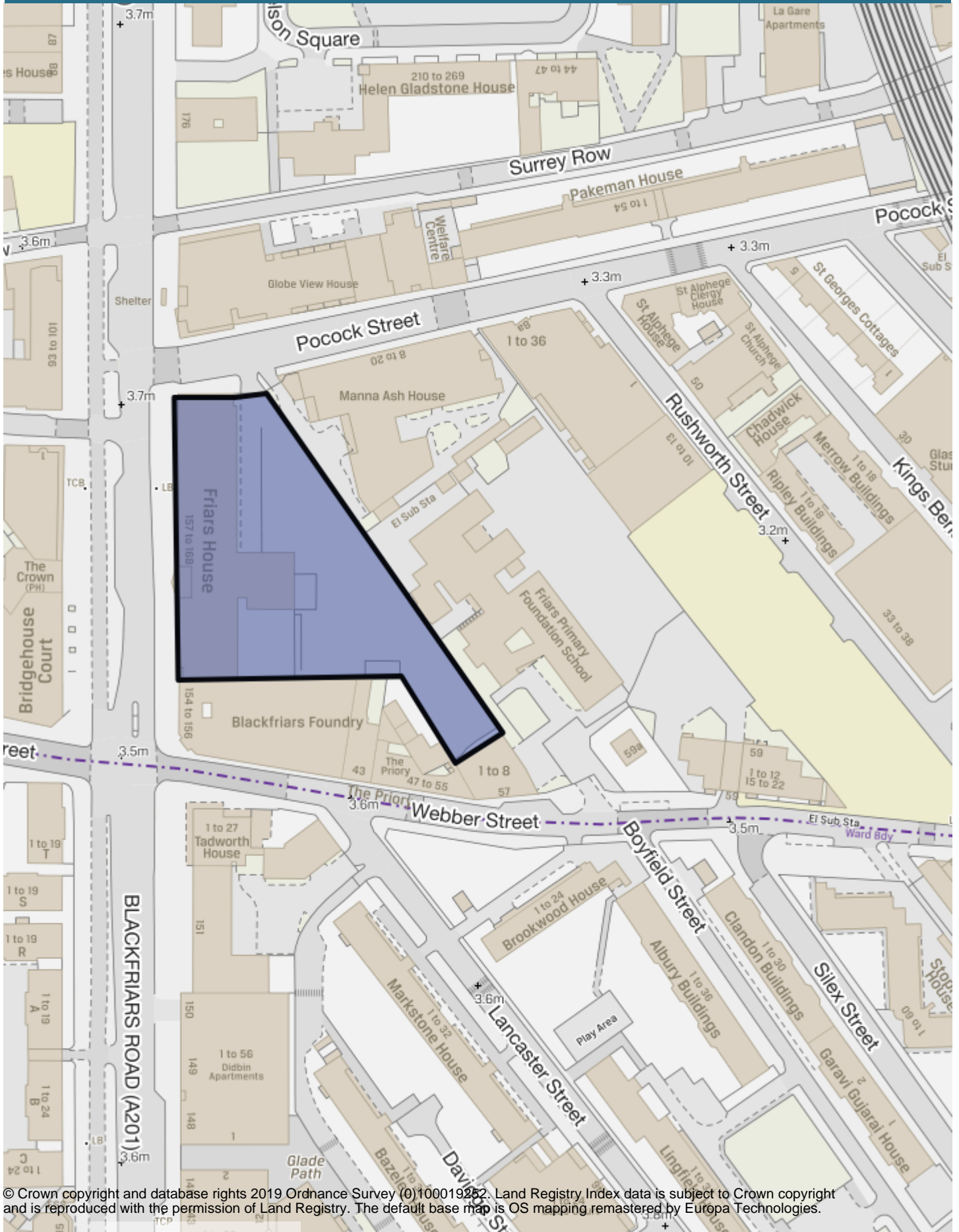
The application was validated promptly and decided within the statutory determination period.

### **Informatives**

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

There is a Thames Water main crossing the development site which may/will need to be diverted at the Developer's cost, or necessitate amendments to the proposed development design so that the aforementioned main can be retained. Unrestricted access must be available at all times for maintenance and repair. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.

The London Fire Brigade require that this development conform to the requirements of part B5 of Approved Document B.



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## CONTENTS

RECOMMENDATIONS .....	2
EXECUTIVE SUMMARY.....	2
BACKGROUND INFORMATION .....	3
Site location and description .....	3
Details of proposal .....	4
Planning history (including summary of recent appeal decision) .....	9
KEY ISSUES FOR CONSIDERATION .....	12
Legal context.....	12
Adopted planning policy .....	13
Emerging planning policy .....	15
Assessment.....	20
Principle of proposed development in terms of land uses.....	20
Environmental impact assessment .....	28
Design .....	28
Quality of accommodation.....	33
Impact of proposed development on amenity of adjoining occupiers and surrounding area .....	34
Impact of adjoining and nearby uses on occupiers and users of proposed development.....	40
Archaeology .....	40
Sustainable development implications .....	40
Trees, landscaping and ecology .....	42
Transport and highways issues.....	42
Planning obligations and Community Infrastructure Levy (CIL) .....	45
Community involvement and engagement.....	48
Community impact and equalities assessment .....	56
Human rights implications .....	56
Positive and proactive engagement: summary table .....	57

<b>Item No.</b> 6.2	<b>Classification:</b> Open	<b>Date:</b> 20 July 2020	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 20/AP/0556 for: Full Planning Application  <b>Address:</b> 160 BLACKFRIARS ROAD LONDON SOUTHWARK  <b>Proposal:</b> Erection of an eight storey building with basement, comprising a hotel (Class C1), flexible commercial or community unit (Class B1/D1), retail floorspace (Class A1/A3), creation of public space, landscaping and associated works. Works to the existing office building at ground and roof levels (including a new rooftop terrace, balustrades and PV panels); elevational alterations; and alterations associated with the creation of a new entrance on the Blackfriars Road elevation.		
<b>Ward(s) or groups affected:</b>	Borough & Bankside		
<b>From:</b>	Director of Planning		
<b>Application Start Date</b> 06/03/2020		<b>Application Expiry Date</b> 05/06/2020	
<b>Earliest Decision Date</b> 02/04/2020			

### RECOMMENDATIONS

1. That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement.
2. That in the event that the requirements of (1) are not met by 30 September 2020, the director of planning be authorised to refuse planning permission (if appropriate) for the reasons set out in paragraph 212.

### EXECUTIVE SUMMARY

3. This application is reported to planning committee because more than five objections were received. It proposes a hotel, office and retail redevelopment on a car park at the rear of an office block on Blackfriars Road.
4. The application follows on from an earlier scheme that was refused by the council in December 2018 (ref. 18/AP/1215), and dismissed by the Planning Inspectorate in October 2019. The key changes from the refused scheme are that current application is two storeys lower than the refused scheme, has a revised architecture, and contains a reduced number of hotel bedrooms (169 bedrooms, rather than 220).
5. The revisions made to the height and design are considered to have successfully addressed the reasons for the dismissal of the recent appeal. Therefore this application is recommended for approval, subject to conditions and the completion of

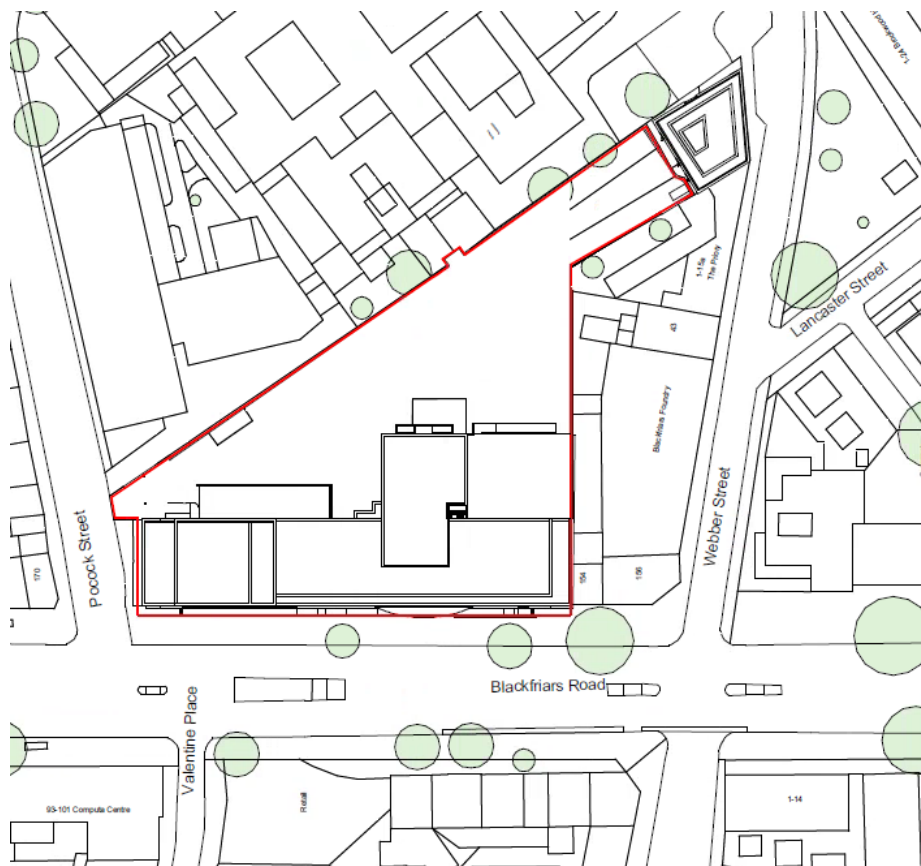


a legal agreement.

## BACKGROUND INFORMATION

### Site location and description

6. The application site is the building, 67-space car park and service yard located at 160 Blackfriars Road. The existing nine-storey building is known as Friars House and is occupied by Class A1 and A3 uses at ground floor level (including a Pret, a Sainsbury's local store, a Costa coffee and juice bar) and Class B1 office space on all upper levels. The existing building is broadly 'T' shaped and extends along the Blackfriars Road frontage of the 0.42 hectare triangular plot. There is a large car park and service yard to the rear on the eastern side which is accessed from Pocock Street, and extends to the south-east, up to the rear of the Webber Street properties.
7. The main site frontage is on Blackfriars Road, and the rest of the site is bound by Pocock Street to the north; Manna Ash House (student halls of residence) to the north east; Friars Primary Foundation School to the east; and The Priory and Blackfriars Foundry to the south on Webber Street.



Site plan (north direction is to the left)

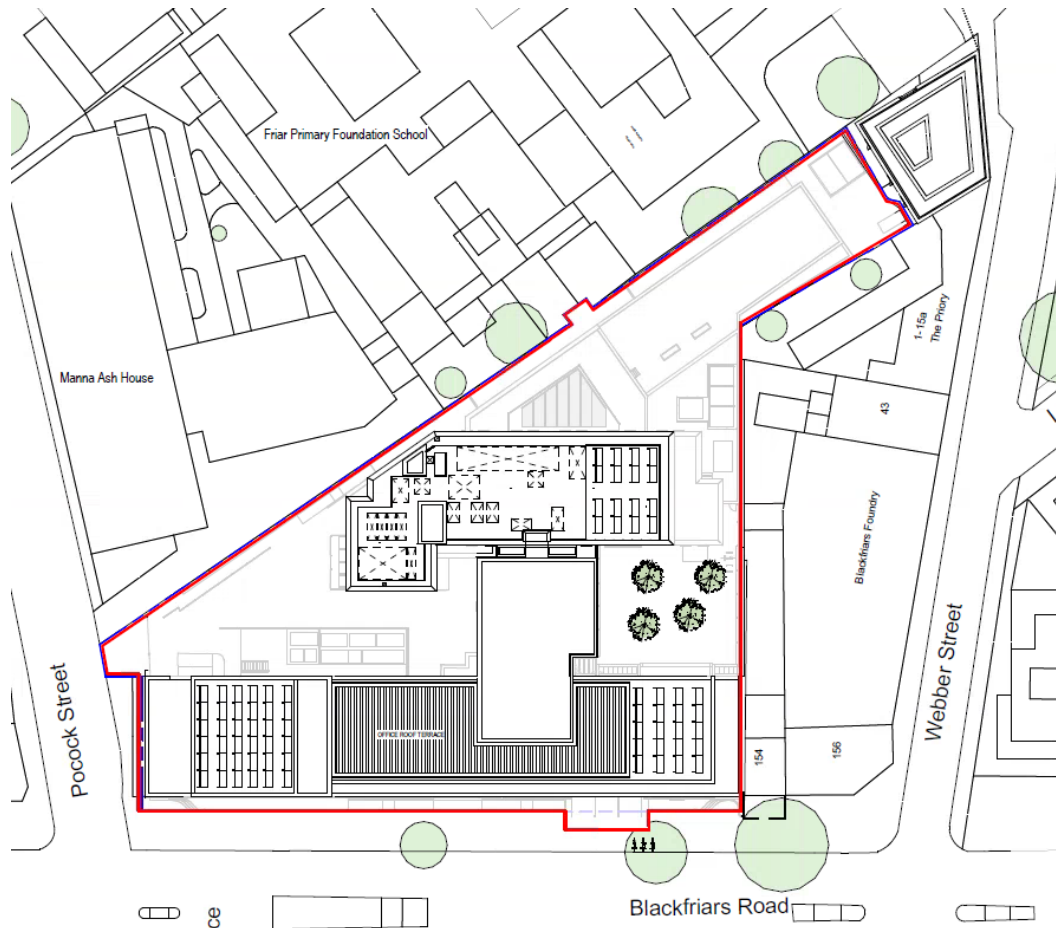
8. The area comprises a variety of building heights and uses, as well as a mix of modern and heritage buildings. To the north of the site, Globe View House has ten storeys (in residential use) and to the north-east Manna Ash House has eight storeys (student housing and ground floor offices). To the east and south on Rushworth Street and Webber Street the buildings are typically lower rise, in the region of three to five storeys in height providing office and residential use. It should be noted that there are

planning permissions on Rushworth Street for buildings rising six and eight storeys that are currently under construction.

9. The site is to the south of, and separate from, the established tall buildings cluster at the northern end of Blackfriars Road.
10. The site is within the Central Activities Zone, Bankside and Borough district town centre, and the Bankside, Borough and London Bridge Opportunity Area. It is also within the air quality management area and flood zone 3. In the emerging New Southwark Plan, the site is within the South Bank Strategic Cultural Quarter and forms the majority of site allocation NSP14 'Friars House, 157-168 Blackfriars Road'.
11. Blackfriars Road is a classified A road with a cycle superhighway and several bus routes which, together with the close proximity of both Waterloo East railway station and Southwark Underground station, give the site a high PTAL of 6B indicating an excellent level of access to public transport.
12. The site is not located within a conservation area nor are there any listed buildings or structures within the application site. It is close to two conservation areas, the Valentine Place Conservation Area 30m to the west, and the King's Bench Conservation Area 50m to the north-east. The Blackfriars Foundry (on the corner with Webber Street) is considered to be a building of townscape merit. The site is close to the following listed buildings:
  - the grade II listed Former Sons of Temperance Friendly Society Building, 60m to the north on Blackfriars Road.
  - the grade II listed Ripley, Chadwick and Merrow Houses on Rushworth Street (100m to the east of the site), and the Drapers Almshouses on Glasshill Street (130m to the east).
  - the grade II listed Albury House and Clandon House – 50m to the south-east of the site on Boyfield Street.
  - the grade II listed Peabody Buildings – 40m to the south-west of the site on Blackfriars Road.

#### **Details of proposal**

13. Planning permission is sought to develop the rear part of the site to provide an 8-storey (plus basement) hotel building with 169 bedrooms, including 10 wheelchair accessible bedrooms and 13 ambulant disabled bedrooms.
14. The hotel building would stand within the current car park and would be linked to the existing Friars House office building at ground floor level.



*Proposed site plan*

15. The development would include a basement to accommodate plant rooms, water tanks, staff room, changing and toilet facilities.
16. The ground floor part would extend into the south-eastern part of the site as a single storey building, behind the Webber Street properties, as shown on the proposed site plan above. The ground floor would provide the hotel reception area and seating space, kitchen, 11 hotel bedrooms in the single storey element that extends into the south-eastern part of the site, plant, refuse stores and back of house spaces.
17. A 223sqm unit for use as affordable workspace or community space is proposed, with toilet facilities. The applicant has been talking to local organisations and providers about how this unit could be used, for example as an artist and maker space, for community events, as a gallery, or for a cultural use, so both Class B1 and D1 uses are proposed to allow flexibility. This unit would open onto a new public realm yard space – called “Friars Yard” – currently where an outdoor terrace for the retail units in the frontage building is located, which would be between the reconfigured retail unit and proposed building. This would be a landscaped space with seating, planting, paving and trees.



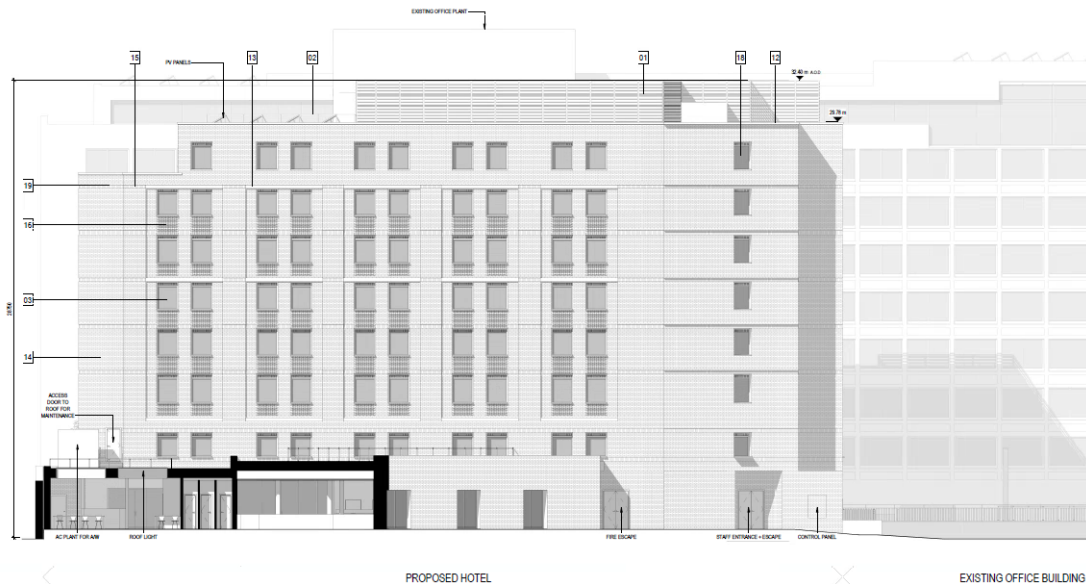
*Proposed ground floor layout*



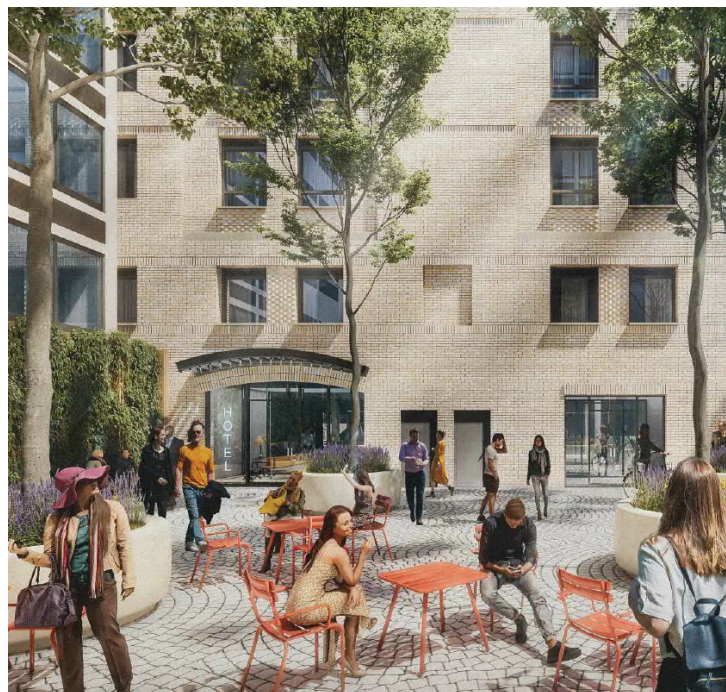
*Typical upper floor plan*



18. The first floor to the sixth floor would have 23 bedrooms each, and the top (seventh) floor would have 20 bedrooms. The building would be 48m wide and 20.3m deep (at its widest point). The roof of the hotel building would house plant and PV panels.
19. The building would have a parapet height of 26.1m (29.8m AOD) and the plant enclosure and lift over run would extend above to a height of 28.8m (32.4m AOD).



*The east elevation (with the ground floor element off to the left, and Friars House on the right)*



*Image of the Friars Yard public realm and lower floors of the hotel building*

20. The hotel building would be in a yellow brick, with patterned panels beneath most windows, soldier courses, stone lintels and coping. The roof plant would be enclosed by metal louvres.

21. The proposal involves changes to the existing office building as well:

- At ground level, removing two existing retail units in order to create a new, covered pedestrian entrance from Blackfriars Road that would lead into the courtyard, and continue to the hotel reception. A replacement retail unit and office reception (for the existing offices above) would be provided on the frontage. The current curved canopy over the Blackfriars Road entrance would be replaced with a larger, rectangular, illuminated one. Alterations are proposed to the stepped and ramped entrances from Blackfriars Road for the ground floor units, office and hotel entrances (see visual below).
- At roof level, the proposal would extend the rooftop terrace over the existing office building, add a glass balustrade and add two areas of PV panels with green roofs below.
- The basement under the existing office building accessed from Pocock Street would be amended to remove the access ramp and replace it with a car lift. The existing 5 car parking spaces would be retained, with two being reconfigured as wheelchair parking spaces.



*Proposed entrance from Blackfriars Road*

#### Amendments

22. Following comments from TfL on the proposed works along the Blackfriars Road frontage, the originally proposed seating has been removed and amended plans provided.

#### Comparison with previous scheme

23. When compared with the previous scheme ref. 18/AP/1215 (that was refused by the council and dismissed at appeal), the following changes have been made:

- Reduction in height from 10 storeys (36.6m high) to 8 (28.8m high), and setting back the southern end of the top floor. This results in a reduction in the number of bedrooms from 220 to 169.
- The layout of the hotel floors has been amended, which removes nearly all of the internal, windowless hotel rooms of the refused scheme. The two hotel rooms without a window would be served by rooflights.

- Changing the architecture of the building which previously was to have a “veil” design of terracotta battens in a paler colour across its top three floors. The building is now proposed in yellow brick throughout, with design features inspired by Victorian warehouses and decorative brickwork features.
- Removing some of the previously proposed alterations to the existing office building – such as the roof terrace pergola and the vertical fins down the front elevation that were intended to highlight the entrance in the 2018 application.
- Rearranging the proposed ground floor to add hotel bedrooms, remove a previously proposed retail unit and rear courtyard, relocate the affordable workspace unit to be next to Friars Yard, and no longer proposing a second courtyard space next to the hotel reception.
- Adding Class D1 use to the ground floor unit so that it could be used for affordable workspace or Class D1 “community” use (although the applicant has not set out what uses within Class D1 this could be).

### **Planning history (including summary of recent appeal decision)**

24. See Appendix 3 for the relevant planning history of the application site. Most relevant is application ref. 18/AP/1215 which was refused by the planning committee, and later dismissed at appeal. That proposal was for:

*Erection of a 10 storey building (40.23m AOD) with basement, comprising a 220 bedroom hotel with ancillary restaurant (Class C1); flexible office space (Class B1); retail units (Class A1/A3); creation of public space; landscaping and associated works. Works to the existing building at ground and roof levels (including a new rooftop terrace, enclosure and PV panels); elevational alteration; creation of a new entrance and the installation of an architectural feature along the Blackfriars Road elevation.*

Refused by the Council - 19/12/2018

Dismissed at appeal - 14/10/2019.

25. The council refused planning permission in December 2019 for six reasons:

**Reason for refusal 1)** *In the absence of a completed s106 agreement, the development has failed to provide appropriate planning obligations to mitigate its adverse impacts on the local area, including in relation to transport, employment and public realm, contrary to saved Southwark Plan policy 2.5 ‘Planning Obligations, Core Strategy policy SP14 ‘Implementation and delivery, London Plan policy 8.2 ‘Planning obligations’ and Southwark’s ‘S106 Planning Obligations’ SPD 2015.*

**Reason for refusal 2)** *The proposed development would lead to an over dominance of visitor accommodation in the locality which would detract from the vitality of the area and harm the local character, and would reduce the potential for other services and uses to be provided for the benefit of residents and visitors. As such the proposal would be contrary to saved policy 1.12 – Hotels and Visitor Accommodation of the saved Southwark Plan (2007) and policy SP10 ‘Jobs and businesses’ of the Core Strategy 2011.*

**Reason for refusal 3)** *The development of a hotel would be contrary to the requirements of site allocation NSP15 of the draft submission version of the New Southwark Plan 2017 which does not list hotels as a required or accepted use. Development of the site for a hotel would remove the potential of the site to deliver new homes, for which there is an acute need in the borough, and which are an acceptable use under the draft site allocation. As such, the development fails to comply with the site allocation within the draft submission New Southwark Plan.*

**Reason for refusal 4)** *The proposal represents an overdevelopment of a constrained site that would lead to an unacceptable impact on the amenity of adjacent occupiers at Globe View House and Sharpley Court in terms of a loss of daylight and sunlight as well as a reduced quality of the learning environment for Friars Primary School as a result of excessive overshadowing of the playground and classrooms. As such the proposed development would be contrary to saved policy 3.2 – Protection of Amenity and 3.11 – Efficient Use of Land of the Southwark Plan (2007); and SP12 – Design and Conservation and SP13 – High Environmental Standards of the Core Strategy (2011).*

**Reason for refusal 5)** *The proposed hotel would include poor quality and sub standard visitor accommodation as a result of providing hotel rooms with no access to natural light and ventilation. As such the proposed development would be contrary to Policy 4.5 - London's Visitor Infrastructure of the London Plan (2016) and the guidance contained within section C which seeks to improve the range and quality of visitor accommodation.*

**Reason for refusal 6)** *The proposed hotel development would have an adverse impact on the townscape by virtue of its excessive height relative to the existing buildings on the main Blackfriars Road frontage. The hotel building would be defined as a 'tall building' by virtue of its height exceeding 30m, but is not located at a point of landmark significance, as required by saved policy 3.20 – Tall Buildings of Southwark Plan (2007), nor does it reinforce character or create a new focal point at a major transport junction as expected under policy SPD 5 – Building Heights of the Blackfriars Road Supplementary Planning Document (2014).*

26. In October 2019 the Inspector dismissed the appeal, but not on all of the same grounds as the council's reasons for refusal. The Inspector's consideration is summarised below against each reason for council's refusal, and the full Inspector's report is attached at Appendix 5. The appeal was dismissed only due to the harm to the character and appearance of the area and the harm to the setting of Blackfriars Foundry (i.e. reason 6 in the council's refusal).

**Reason for refusal 1)** A unilateral undertaking was provided by the applicant to secure the necessary mitigation and contributions, and therefore the appeal was not dismissed for reason for refusal 1.

**Reason for refusal 2)** The Inspector concluded that *"a single additional hotel on the appeal site would not tip the balance for the nearby area such as to amount to a significant change in character for this locality. Both on its own, and in combination with other existing and permitted developments, the addition of one further hotel on the appeal site would not unduly compromise the balance of local land uses."* The appeal was not dismissed for this reason.

**Reason for refusal 3)** The Inspector stated that:  
*"There is no scheme to demonstrate that the car park alone could be suitable for any significant amount of housing development and the owners have expressly ruled out redevelopment for housing. The existing office has been recently refurbished, and is unlikely to be redeveloped soon, so there is very little prospect of housing development on the site in the foreseeable future. While there could be conflict with the allocation in emerging policy NSP15 of the draft submission version of the New Southwark Plan 2017, which stipulates that development proposals for the wider site should include housing, as this is unlikely to happen, even over a 15 year timespan, and as the policy is far from adoption, this conflict should be given limited weight."* The appeal was not dismissed for this reason.



**Reason for refusal 4)** The Inspector commented that the nursery area of the adjacent primary school would be affected by a loss of daylight and a reduction in sunlight. The decision notes *“While these matters are not sufficient to outweigh the general benefits of a substantial development in a prime location, they nonetheless add slightly to the harm I have identified.”* He did not comment on the impact of surrounding residential properties. The appeal was not dismissed for this reason.

**Reason for refusal 5)** Some 23% of the proposed hotel rooms would have had no window. The Inspector found that *“the size and lack of windows alone should not be a bar to this development”* and so did not dismiss the appeal for this reason.

**Reason for refusal 6)** The Inspector did agree with this reason for refusal. The Inspector considered the taller height of the hotel at 36m compared with the height of nearby buildings at 30m or below would be a significant increase *“amounting to a step change in heights”*. This increase would be particularly apparent when seen above the Foundry (a non-designated heritage asset) from Blackfriars Road, and from Webber Street. The Inspector considered that the proposed materials to the upper floors would not break up the appearance of an otherwise monolithic block, but would *“likely stand out in a more pronounced fashion”* and so result in an awkward mix of a building failing to be *“either an attractive landmark or a subtle and subservient addition”*. He found the proposal to be in conflict with the tall building criteria of policy 3.20 and the Blackfriars Road SPD, and significant harm to the setting of the Foundry.

#### **Planning history of adjoining and nearby sites**

##### 27. 90-92 Blackfriars Road

- 12/AP/3558 – Demolition of existing buildings and erection of a replacement building of five to eight storeys in height (max height of 27.5m), plus basement, comprising 53 residential units, 633 sqms of retail floorspace (Use Class A1) and 767sqms of office floorspace (Use Class B1), disabled parking spaces and roof top landscaped amenity areas. Granted 4 March 2013. Under construction.
- 19/AP/5503 – Variation of condition 19 (restriction of roof plant) of planning permission 14/AP/2922 granted on 18/08/2015 for 'Variation of condition 2 (approved plans) to planning permission 12/AP/3558 granted on 04/06/2013 for 'Demolition of existing buildings and erection of a replacement building of five to eight storeys in height (max height 27.5m) plus basement, comprising 53 residential units 633sqm of retail floorspace (Use Class A1) areas' to allow for installation of x3 mechanical smoke extraction fans at 6th and 7th floor roof levels and x2 air conditioning units to the 7th floor roof levels. Current application pending determination.

##### 28. Caretakers House, Friars Primary School, Webber Street

- 16/AP/5208 – Construction of a new part educational and part residential five storey building comprising ground and first floor educational space (Use class D1) and 8 x flats (Use class C3) above with access, landscaping and ancillary works together with the demolition of the former caretaker's house. Granted 15 May 2017. Development completed.

##### 29. 24-28 Rushworth Street and 61 Webber Street

- 15/AP/2705 – Demolition of the existing building and erection of part six part eight storey (plus basement) mixed use building comprising 40 residential units (15 x 1

bed, 18 x 2 bed & 7 x 3 bed) (use class C3) and 2241 sqm (GIA) flexible commercial space (use class B1) and associated works. Granted 4 August /2016.

- 17/AP/1959 – Planning permission granted with legal agreement on 4 December 2017 for the construction of a new part five, part six storey building to provide commercial floorspace (Use Class B1), associated servicing, cycle parking and landscaping. Under construction.

30. 14-21 Rushworth Street

- 15/AP/4000 – Planning permission granted with legal agreement on 31 March 2016 for the erection of a new part five, part six storey building to provide commercial floorspace at lower ground, ground and first floor level (Use Class B1) and 47 residential units (Use Class C3) on first to fifth floor levels, associated disabled car parking, cycle parking and landscaping. Under construction.

31. 33-38 Rushworth Street

- 17/AP/4289 – Part demolition of existing commercial buildings (Class B1 Business Use) and construction, behind part-retained existing facades, of a part 3, part 4 and part 5 storey building (plus plant enclosure) comprising 3,232m of Class B1 Office/Business floorspace and 1,026m of Class A1 / A3 / B1 / D1 / D2 Use floorspace (retail/restaurant/business/community/leisure use). Associated hard landscaping and public realm. Current application pending determination.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

32. The main issues to be considered in respect of this application are:

- Principle of development in terms of land uses;
- Environmental impact assessment;
- Design;
- Quality of accommodation;
- Impact on the amenities of occupiers of adjoining properties;
- Impact of adjoining and nearby uses on occupiers and users of the proposed development;
- Archaeology;
- Sustainable development implications;
- Trees, landscaping and ecology;
- Transport and highways issues;
- Planning obligations and Community Infrastructure Levy (CIL);
- Community involvement and engagement;
- Community impact and equalities assessment;
- Human rights and;
- Positive and proactive statement.

33. These matters are discussed in detail in the Assessment section of this report.

### **Legal context**

34. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan (2016), the Core Strategy (2011), and the saved policies

of the Southwark Plan (2007).

35. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

### **Adopted planning policy**

36. The site is within the Central Activities Zone (CAZ), and Air Quality Management Area (AQMA). The site is within the Bankside, Borough and London Bridge Opportunity Area and the Bankside and Borough district town centre. The site is within the area covered by the Blackfriars Road SPD.
37. The planning application should be determined in general accordance with the development plan and National Planning Guidance unless material considerations indicate otherwise; and the following national, regional and local policies and guidance are of particular relevance to this proposal:

#### National Planning Policy Framework

38. The National Planning Policy Framework (NPPF) is a material consideration. The revised NPPF was published in February 2019 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.
39. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications. The following sections are relevant:
- Chapter 2 Achieving sustainable development
  - Chapter 6 Building a strong, competitive economy
  - Chapter 7 Ensuring the vitality of town centres
  - Chapter 8 Promoting healthy and safe communities
  - Chapter 9 Promoting sustainable transport
  - Chapter 11 Making effective use of land
  - Chapter 12 Achieving well-designed places
  - Chapter 14 Meeting the challenge of climate change, flooding and coastal change
  - Chapter 15 Conserving and enhancing the natural environment
  - Chapter 16 Conserving and enhancing the historic environment.

#### The London Plan 2016

40. The London Plan is the regional planning framework and was adopted in 2016. The relevant policies of the London Plan are:
- Policy 2.5 Sub-regions
  - Policy 2.10 Central Activities Zone – strategic priorities
  - Policy 2.11 Central Activities Zone – strategic functions
  - Policy 2.12 Central Activities Zone – predominantly local activities
  - Policy 2.13 Opportunity areas and intensification areas
  - Policy 3.16 Protection and enhancement of social infrastructure
  - Policy 4.1 Developing London's economy
  - Policy 4.2 Offices
  - Policy 4.3 Mixed use development and offices
  - Policy 4.5 London's visitor infrastructure
  - Policy 4.7 Retail and town centre development
  - Policy 4.12 Improving opportunities for all

Policy 5.1 Climate change mitigation  
 Policy 5.2 Minimising carbon dioxide emissions  
 Policy 5.3 Sustainable design and construction  
 Policy 5.7 Renewable energy  
 Policy 5.9 Overheating and cooling  
 Policy 5.10 Urban greening  
 Policy 5.11 Green roofs and development site environs  
 Policy 5.12 Flood risk management  
 Policy 5.13 Sustainable drainage  
 Policy 5.14 Water quality and waste water infrastructure  
 Policy 5.15 Water use and supplies  
 Policy 5.18 Construction, excavation and demolition waste  
 Policy 5.21 Contaminated land  
 Policy 6.1 Strategic approach  
 Policy 6.3 Assessing effects of development on transport capacity  
 Policy 6.5 Funding Crossrail and other strategically important transport infrastructure  
 Policy 6.9 Cycling  
 Policy 6.10 Walking  
 Policy 6.11 Smoothing traffic flow and tackling congestion  
 Policy 6.12 Road network capacity  
 Policy 6.13 Parking  
 Policy 7.1 Lifetime neighbourhoods  
 Policy 7.2 An inclusive environment  
 Policy 7.3 Designing out crime  
 Policy 7.4 Local character  
 Policy 7.5 Public realm  
 Policy 7.6 Architecture  
 Policy 7.8 Heritage assets and archaeology  
 Policy 7.11 London View Management Framework  
 Policy 7.14 Improving air quality  
 Policy 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes  
 Policy 7.19 Biodiversity and access to nature  
 Policy 8.2 Planning obligations  
 Policy 8.3 Community Infrastructure Levy.

#### Core Strategy 2011

41. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy are:
- Strategic Targets Policy 1 – Achieving growth
  - Strategic Targets Policy 2 – Improving places
  - Strategic Policy 1 – Sustainable development
  - Strategic Policy 2 – Sustainable transport
  - Strategic Policy 3 – Shopping, leisure and entertainment
  - Strategic Policy 4 – Places for learning, enjoyment and healthy lifestyles
  - Strategic Policy 10 – Jobs and businesses
  - Strategic Policy 12 – Design and conservation
  - Strategic Policy 13 – High environmental standards
  - Strategic Policy 14 – Implementation and delivery.

#### Southwark Plan 2007 - saved policies

42. In 2013, the council resolved to 'save' all of the policies in the Southwark Plan 2007

unless they had been updated by the Core Strategy with the exception of Policy 1.8 (location of retail outside town centres). Paragraph 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. The relevant policies of the Southwark Plan are:

Policy 1.1 Access to Employment Opportunities

Policy 1.4 Employment sites outside the Preferred Office Locations and Preferred Industrial Locations

Policy 1.7 Development within town and local centres

Policy 1.12 Hotels and other visitor accommodation

Policy 2.2 Provision of new community facilities

Policy 2.5 Planning Obligations

Policy 3.1 Environmental Effects

Policy 3.2 Protection of Amenity

Policy 3.3 Sustainability Assessment

Policy 3.4 Energy Efficiency

Policy 3.6 Air Quality

Policy 3.7 Waste Reduction

Policy 3.9 Water

Policy 3.11 Efficient Use of Land

Policy 3.12 Quality in Design

Policy 3.13 Urban Design

Policy 3.14 Designing Out Crime

Policy 3.18 Setting of listed buildings, conservation areas and World Heritage Sites

Policy 3.19 Archaeology

Policy 3.28 Biodiversity

Policy 5.1 Locating Developments

Policy 5.2 Transport Impacts

Policy 5.3 Walking and Cycling

Policy 5.6 Car Parking

Policy 5.7 Parking Standards for Disabled People and the Mobility Impaired.

#### Southwark Supplementary Planning Documents

43. The following Supplementary Planning Documents issued by the council are material considerations:

Blackfriars Road SPD (2014)

Design and Access Statements SPD (2007)

Section 106 Planning Obligations and CIL SPD (2015)

Sustainability Assessment SPD (2009)

Sustainable Design and Construction SPD (2009)

Draft Borough, Bankside and London Bridge SPD (2009).

#### GLA Supplementary Planning Guidance

44. The following Supplementary Planning Guidance issued by the GLA are material considerations:

Sustainable Design and Construction SPG (2014)

Central Activities Zone SPG (2016)

Crossrail Funding SPG (2016).

#### **Emerging planning policy**

45. The draft development plan documents of the New London Plan and New Southwark

Plan are material considerations that can be given weight.

#### Draft London Plan

46. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2 March 2018. Following an Examination in Public, the Mayor then issued the Intend to Publish London Plan. The Secretary of State responded to the Mayor in March 2020 where he expressed concerns about the Plan and has used his powers to direct changes to the London Plan. The London Plan cannot be adopted until these changes have been made.
47. Until the New London Plan reaches formal adoption it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.
48. The draft New London Plan is the strategic plan which sets out an integrated economic, environmental, transport and social framework for the development of London for the period from 2019 to 2041. The annual housing targets are set for the first 10 years only of the Plan. A range of consultation responses were received to the draft policies from London councils, individuals, businesses, campaign groups, community groups, government bodies etc.
49. Due to the stage it has reached, just before its adoption, the New London Plan can be given weight in decision making, and it is noted that the GLA when commenting upon referable applications does accord substantial weight to many of the emerging policies. The following policies are relevant to this proposal:
  - GG1: Building strong and inclusive communities
  - GG2: Making the best use of land
  - GG3: Creating a healthy city
  - GG5: Growing a good economy
  - GG6: Increasing efficiency and resilience
  - SD1: Opportunity Areas
  - SD4: The Central Activities Zone
  - SD5: Offices, other strategic functions and residential development in the CAZ
  - SD6: Town centres and high streets
  - SD7: Town centres development principles and Development Plan Documents
  - D1: London's form, character and capacity for growth
  - D2: Infrastructure requirements for sustainable densities
  - D3: Optimising site capacity through the design-led approach
  - D4: Delivering good design
  - D5: Inclusive design
  - D8: Public realm
  - D14: Noise
  - S1: Developing London's social infrastructure
  - E1: Offices
  - E2: Providing suitable business space
  - E3: Affordable workspace
  - E9: Retail, markets and hot food takeaways
  - E10: Visitor infrastructure
  - E11: Skills and opportunities for all
  - HC1: Heritage conservation and growth
  - G1: Green infrastructure
  - G5: Urban greening

G6: Biodiversity and access to nature  
 G7: Trees and woodlands  
 S11: Improving air quality  
 S12: Minimising greenhouse gas emissions  
 S17: Reducing waste and supporting the circular economy  
 S112: Flood risk management  
 S113: Sustainable drainage  
 T1: Strategic approach to transport  
 T2: Healthy streets  
 T3: Transport capacity, connectivity and safeguarding  
 T4: Assessing and mitigating transport impacts  
 T5: Cycling  
 T6: Car parking  
 T7: Deliveries, servicing and construction  
 T9: Funding transport infrastructure through planning  
 DF1: Delivery of the Plan and Planning Obligations.

### New Southwark Plan

50. For the last five years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 consultation closed in May 2019. These two documents comprise the Proposed Submission Version of the New Southwark Plan.
51. These documents and the New Southwark Plan Submission Version (Proposed Modifications for Examination) were submitted to the Secretary of State in January 2020 for Local Plan Examination. The New Southwark Plan Submission Version (Proposed Modifications for Examination) is the council's current expression of the New Southwark Plan and responds to consultation on the NSP Proposed Submission Version. This version will be considered at the Examination in Public (EiP).
52. It is anticipated that the plan will be adopted in late 2020 following an EiP. As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.
53. The evidence base to support the NSP is substantially complete. The NPPF states that the more advanced the preparation of the plan, the more weight can be given. The NSP has been subject to six rounds of consultation and comprehensive consultation reports have been prepared at each stage in response to representations. The council received 332 representations to the Proposed Submission Version (2018) and as a result some policies were amended and further consultation took place in 2019. The council received 131 representations to the Amended Policies consultation. A full consultation report incorporating comments from both stages of the Regulation 19 consultation was prepared alongside Submission. The council is meeting various community planning interest groups, as well as preparing Statements of Common Ground with individuals and organisations who will be taking an active part in the EiP.
54. In response to the various rounds of consultation on the NSP, a variety of comments and objections were received from individuals, groups and businesses. Where no objections were received a draft policy can be given more weight than for policies

where objections were received and have not been resolved, particularly where there is little change from current adopted policies. For example, the following NSP policies can be given moderate weight as no objections were received or they are very similar to policies in the development plan:

P12 Design of places  
 P13 Design quality  
 P15 Designing out crime  
 P17 Efficient use of land  
 P18 Listed buildings and structures  
 P19 Conservation areas  
 P22 Archaeology  
 P32 Business relocation  
 P48 Public transport  
 P49 Highway impacts  
 P50 Walking  
 P52 Cycling  
 P53 Car parking (no substantial objections were received, comments related to minimising residential car parking)  
 P55 Protection of amenity  
 P58 Green infrastructure  
 P59 Biodiversity  
 P60 Trees  
 P61 Reducing waste  
 P63 Contaminated land and hazardous substances  
 P64 Improving air quality  
 P67 Reducing flood risk  
 P68 Sustainability standards.

55. Where draft policies are different from the adopted policy (or are completely new policies) and objections were received, the specifics of those objections and the differences from the adopted policy need to be considered for each planning application proposal. For example:

P27 Access to employment and training – objection was received relating to the financial burden.  
 P29 Office and business development – objections related to the two year marketing justification and differentiation of B Class uses.  
 P30 Affordable workspace – objections relating to strengthening the policy and including viability testing.  
 P34 Town and local centres – objections relate to a lower threshold and strengthening the policy.  
 P40 Hotels and other visitor accommodation – objections received in terms of the new ancillary features requirement.  
 P46 Community uses – objections to strengthening this policy.  
 P65 Reducing noise pollution and enhancing soundscapes – the agent of change principle in the NPPF must also be considered.

56. Where objections were received to a draft policy and these have not been resolved through revisions, that policy can have only limited weight. In these instances, the degree of change from adopted policy on these topics should also be considered. Examples of these policies include:

P54 Parking standards for disabled people and mobility impaired people.  
 P69 Energy – objections that the December 2017 version P62 being too onerous for



the carbon reductions.

57. The NSP responds positively to the NPPF, by incorporating area visions, development management policies and 82 site allocations which plan for the long term delivery of housing. The NSP responds to rapid change which is occurring in Southwark and London as a whole, and responds positively to the changing context of the emerging New London Plan.
58. The application site is within the AV.04 Blackfriars Road Area Vision, which seeks to increase the number of homes, provide new employment floorspace, hotels and shops, and improve the look and feel of streets and public spaces. It is within site allocation NSP14 'Friars House, 157-168 Blackfriars Road' (formerly listed as NSP15) which states that:

*"Redevelopment of the site must:*

- *Provide at least the amount of employment floorspace (B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and*
- *Provide active frontages with ground floor town centre uses A1, A2, A3, A4, D1, D2 on Blackfriars Road.*

*Redevelopment of the site should:*

- *Provide new homes (C3)."*

59. NSP14 goes on to state that redevelopment of the site will retain a similar mix of uses with employment uses remaining the principal use, and which could include taller buildings, subject to consideration of impacts on existing character, heritage and townscape.
60. In line with paragraph 48 of the NPPF, as both the New London Plan and the New Southwark Plan are at an advanced stage of preparation (the New London Plan being further progressed) both can be afforded some material weight and this is detailed in the report where relevant to particular policy issues.

## **Consultation**

61. Details of consultation undertaken in respect of this application are set out in paragraph 216 onwards below and Appendices 1 and 2.
62. Statutory consultation was undertaken on the proposed development including neighbour letters, sites notices and a press notice in Southwark News. The applicant undertook community engagement consulting on the proposals prior to the submission of the planning application. A consultation engagement summary was submitted to support the application to this effect. Further information can be found in paragraph 213 below and it is attached at Appendix 6.

### Summary of consultation responses

63. 26 comments were received from members of the public regarding the proposed development. 22 of these were objections, one neutral and three in support. The issues raised by the submitted objections are summarised as:
- The scheme has not changed sufficiently from the previous refusal.
  - The principle of another hotel in this location, which would harm the character of the area.

- The local community needs housing, community use or a park not another hotel.
  - Poor design and quality of accommodation.
  - Impacts on neighbour amenity from loss of privacy, outlook, daylight and sunlight, and from noise during construction and operation.
  - Construction impacts from vehicles and pollution.
  - Additional vehicles for servicing and hotel guests, parking stress increasing.
64. The one neutral comment questioned the design for this context next to beautiful heritage buildings.
65. The three comments in support were in regard to:
- The local community engagement and changes made in response to comments.
  - Noting the design changes since the refusal, and how it would address an unsightly and vacant section of road frontage.
  - It being a sensible plan for an empty car park.
  - The high environmental standards.
  - While a more ambitious architecture might be better, there is little reason to discourage development in this central London location. High quality detailing is needed.
66. These matters are covered in detail in the remainder of this report.

## **Assessment**

### **Principle of proposed development in terms of land uses**

67. At the heart of the NPPF is the presumption in favour of sustainable development. Among the key themes in achieving sustainable development are ensuring the vitality of town centres, promoting sustainable transport, supporting a strong economy, and delivering good design. This section sets out the adopted policy context, and the emerging policy documents in terms of the principle of the development of this site for the proposed uses. The recent appeal decision is also referenced.

### Policy context

68. The application site is located within the Central Activities Zone (CAZ), the Bankside, Borough and London Bridge Opportunity Area and the Borough and Bankside district town centre. The site also falls within the area designated in the Blackfriars Road SPD.
69. The London Plan considers Opportunity Areas to be *“the capital’s major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other developments linked to existing or potential improvements to public transport”* (paragraph 2.58). Within Opportunity Areas, London Plan policy 2.13 seeks to optimise residential and non-residential output and densities, provide social and other infrastructure to sustain growth, and, where appropriate contain a mix of uses. Development proposals should contribute towards meeting (or where appropriate, exceeding) the indicative estimates for employment capacity including supporting wider regeneration (including in particular improvements to environmental quality) and integration of developments to the surrounding area. London Plan policy 4.5 ‘London’s visitor infrastructure’ expects strategically important hotel provision to be located in Opportunity Areas.
70. Table A1.1 in Annex 1 of the London Plan provides an indicative employment capacity

of 25,000 new jobs to be delivered within the Bankside, Borough and London Bridge Opportunity Area over the Plan period (up to 2031).

71. Southwark's Core Strategy reinforces the London Plan aspirations for development in the CAZ to support London as a world class city. The CAZ and Opportunity Areas are targeted as growth areas in the borough where development will be prioritised. The council will allow more intense development for a mix of uses in the growth areas and make sure development makes the most of a site's potential and protects open space (Strategic Policy 1).
72. The council's Blackfriars Road SPD sets out (at paragraph 2.2.3) the emerging vision: *"Blackfriars Road will be transformed into a vibrant place where people will want to work, live and visit. The historic, wide boulevard will provide a range of different activities, regenerating the area from the river along Blackfriars Road and stimulating change at the Elephant and Castle."*
73. The SPD encourages the generation of new jobs and businesses to reinforce the area as a strategic office and employment location. It requires existing business floorspace to be retained or replaced and encourages a range of other town centre uses which include hotels as defined by the NPPF. Policy SPD2 of the SPD encourages this mixed use nature and states: *"We will encourage the provision of town centre uses to help enhance the commercial attractiveness of Blackfriars Road, supporting proposals for new hotels and other forms of visitor accommodation (Class C1) to ensure there is a good supply of accommodation for visitors and to contribute to a mix of uses and employment opportunities. Proposals should seek to maximise the opportunity to include activity along the lower and street level frontages."*

#### Emerging policy context

74. There are two important emerging policy documents that are material considerations for the assessment of this application; the draft London Plan; and the draft New Southwark Plan.
75. The New Southwark Plan (NSP) is in its submission version, which was submitted to the Secretary of State in January 2020 for Local Plan Examination. As the NSP is not yet adopted policy, it cannot be given full weight. Decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework. This is set out in more detail in the policy section above, but in summary the main policies that relate to land uses each fall into the category where objections were received to the draft policies that differ from adopted policy. Therefore the differences from the adopted policy need to be considered for each application proposal:
  - P34 Town and local centres – ensures main town centre uses are located in town and local centres while not resulting in a concentration of uses that harms the vitality and viability of the centre, provide active uses at ground floor, and retain Class A use or replace with an alternative use that provides a service to the public.
  - P40 Hotels and other visitor accommodation – requires the design, scale and function, parking and servicing arrangements to respond positively to local character and protect amenity, and to provide at least 10% of the total floorspace as ancillary facilities.
  - P29 Office and business development – in the CAZ, Opportunity Areas and town

centres requires the retention or increase in the amount of employment floorspace in Class B uses.

- P30 Affordable workspace – supports and requires the provision of affordable workspace on Class B schemes.
  - P46 Community uses – supports new facilities that are accessible for all members of the community.
76. The site is listed as an allocated site in the NSP within the Blackfriars Road Area Vision. The site allocation requirements are framed to assume a full redevelopment of the site, which extends to the south to include part of Blackfriars Foundry, 43 Webber Street and the rear of The Priory on Webber Street as well. Site allocation 'NSP14: Friars House 157-168 Blackfriars Road' includes a requirement for redevelopment to:
- provide at least the amount of employment floorspace (B class) currently on the site or to provide at least 50% of the development as employment floorspace, whichever is greater.
  - provide active frontages with ground floor town centre uses A1, A2, A3, A4, D1, D2 on Blackfriars Road.
  - it states that redevelopment of the site “should provide new homes (C3)”.
77. In this application (as with the 2018 application), the office block is retained mainly in its current form with only changes to its reception area and roof, with the proposed hotel constructed on the car park behind. The application is assessed against the emerging NSP at paragraphs 93-98 below.
78. The draft London Plan had its examination in public in 2019, and the Secretary of State responded to the Mayor in March 2020 where he expressed concerns about the Plan and has used his powers to direct changes to the London Plan. Decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.
79. Draft London Plan policies GG2 'Making the best use of land' and SD1 'Opportunity Areas' seek to enable the development of brownfield land particularly in Opportunity Areas, to intensify the use of land in locations that are well-connected and support developments that create employment opportunities. Policy SD4 'The CAZ' in part B acknowledges the nationally and internationally significant office function of the CAZ which should be supported and enhanced; in part E acknowledges the unique concentration of cultural, arts, entertainment and tourist functions that should be promoted and enhanced (with the supporting text noting that tourism facilities including hotels are strategic functions of the CAZ) and; in part F supports its retail functions. Similarly policy SD6 'Town centres and high streets' suggests commercial activity, an accessible environment and tourist infrastructure should be enhanced and promoted. Policy SD7 'Town centres: development principles and DPDs' sets out the town centre first approach for main town centre uses.

Land use assessment for each part of the proposal against adopted and emerging policies

80. The Blackfriars Road SPD's aspiration for the area is to have a mix of shops, offices and services. It expects opportunities to increase the amount and type of development to be maximised, especially opportunities for flexible innovative business space and town centre uses which include hotels.
81. The proposed development would comprise a hotel, affordable workspace or

community use, a replacement office reception, and a replacement retail unit (with an overall reduction in retail space). Each use is considered in turn below.

#### Hotel (Class C1)

82. The London Plan in policy 4.5 'London's visitor infrastructure' aims to provide a net increase of 40,000 hotel bedrooms by 2036 and seeks to focus strategically-important new visitor provision within Opportunity Areas in the CAZ. Strategic policy 10 'Jobs and businesses' of the Core Strategy advises that hotels would be allowed in town centres, strategic cultural areas and places with good accessibility to public transport, providing that there is no harm to local character. Saved policy 1.12 of the Southwark Plan states that hotels will be encouraged in areas with high public transport accessibility, but that they will not be permitted where they would result in an over dominance of visitor accommodation in the locality. The Blackfriars Road SPD supports the provision of new hotels, particularly in SPD2, to ensure there is a good supply of accommodation for visitors and to contribute to a mix of uses and employment opportunities.
83. The GLA's Hotel Demand Study (2006) indicated that approximately 2,500 additional hotel rooms would be needed in the borough over the period 2007 to 2026. Given the number of new hotels built, and those that have permission, it is likely that this target will be reached and exceeded. A more recent GLA report 'Projections of demand and supply for visitor accommodation in London to 2050' (2017), which provides part of the evidence base to the draft London Plan, sets a higher target of 58,140 net additional rooms across London by 2041. It suggests a target for Southwark of 1,795 net additional rooms in the period 2015 to 2041. It also notes that Southwark currently provides 4% of the total visitor accommodation for London, the 7th highest borough total. Within the borough, most visitor accommodation is concentrated within the north-western part of the borough within the CAZ.
84. The application site is located within the CAZ, an Opportunity Area, and a town centre. It has a high public transport accessibility level (which is 6b which represents the highest accessibility) and is within walking distance of Southwark, Blackfriars and Waterloo stations. Several bus routes serve Blackfriars Road and Blackfriars Station also provides a direct route to both Gatwick and Luton Airports. This location therefore meets the requirement for high public transport accessibility. The site is considered to be well suited for hotel use given its excellent accessibility to public transport and close proximity to a number of major tourist attractions. The majority of the borough's attractions are located within the Bankside and London Bridge area (with the strategic cultural area 200m to the north of the site) and as such it is reasonable to expect to see hotel accommodation provided in these areas.
85. The requirement in saved Southwark Plan policy 1.12 for the proposal to not result in an over dominance of visitor accommodation also needs to be considered. An over-concentration of hotels can detract from the vitality of an area, reduce the opportunity for a range of other services to be provided, and can increase the transient population in an area, which does not help towards creating a stable and engaged community, as well as potentially being detrimental to the character and functioning of an area. There are a number of existing hotels which are located within close proximity to the application site and in the wider Bankside area. The Bankside area has seen a strong growth in hotels and, whilst this growth helps meet a demand, it is important that this is balanced against the aim of fostering a stable community, and providing space for offices and other important facilities. The number of hotel developments, both built and in the development pipeline, has increased significantly in the last decade and these are concentrated in the northern part of the borough.

86. The number of existing and approved hotels in the area was discussed in the public inquiry for the previous application as it formed one of the council's reasons for refusal. While the planning policies do not define the size of a 'local area' both the council and appellant used a 800m (0.5 mile) radius around the site as the assessment area. In compiling evidence for the public inquiry in summer 2019, officers found there were 22 hotels, four apart-hotels and two hostels within 800m of the application site providing 4,325 rooms. The majority of these are within Southwark's boundary, with five hotels and four serviced apartments in Lambeth. Taking account of the estimated figure of 5,800 existing visitor rooms across Southwark, the visitor accommodation in Southwark within 800m of the appeal site represented over 50% of the total rooms within the borough.
87. The council also gave evidence to the Inspector on the concentration of visitor accommodation in this area, and how visitor accommodation in this area was set to increase, with nine permissions for visitor accommodation (as new hotels, an apart-hotel and extensions to existing) within 800m of the appeal site totalling a further 1,3815 rooms, two of which were under construction in summer 2019. If all these permissions were implemented, there would be a total of 5,706 visitor rooms within 800m of the site.
88. Following on from the evidence submitted to the public inquiry, the council's NSP background paper "Hotels and visitor accommodation December 2019" includes data on recent permissions and current applications for hotels in the borough. The data for approvals between 2016-2019 for permissions across the borough that were extant in June 2019, totalled 1,798 rooms. One further permission has since been approved (ref. 18/AP/0657) in June 2020 for the site of 19 Harper Road/325 Borough High Street for another 328 hotel rooms, which is within 0.5 miles of the application site.
89. For reference, the applicant's figures suggest that as of January 2020 there are 24 hotels (with 4,337 rooms) within 800m of the site, and in terms of recent permissions there are a further six hotels with planning permission and a further three permissions for extensions to existing hotels (with a total of 1,658 rooms) within 800m of the site.
90. Despite the evidence put to the Inspector by the council of the number of existing hotels and bedrooms in the local area, and the additional visitor accommodation in the pipeline, the Inspector did not dismiss the appeal for this reason. The Inspector concluded that *"a single additional hotel on the appeal site would not tip the balance for the nearby area such as to amount to a significant change in character for this locality. Both on its own, and in combination with other existing and permitted developments, the addition of one further hotel on the appeal site would not unduly compromise the balance of local land uses."*
91. When assessing the current application, officers conclude that while there are a number of hotels in the locality, the surrounding land uses of this site remain very mixed and include offices, residential and retail. Therefore in light of the Inspector's conclusion that one further hotel *"would not unduly compromise the balance of local land uses"*, it is recommended that it would not be prudent or appropriate to refuse permission for this revised scheme on the basis of an over-concentration of hotel uses. It is also acknowledged that this revised proposal has 51 fewer bedrooms than the appeal scheme.
92. The proposal has been considered against the emerging planning documents as these are material considerations. Draft London Plan policy E10 'Visitor infrastructure' in part F supports serviced accommodation in the CAZ and Opportunity Areas except

in wholly residential streets or predominantly residential neighbourhoods, and subject to the impact on office space and other strategic functions, and avoiding compromising local amenity or the balance of local land uses. The site in this part of Blackfriars Road is in a mixed use area, and not a wholly residential street or predominantly residential neighbourhood with student housing, school, residential and commercial uses adjoining the site. The various amenity considerations are set out in the later sections of the assessment below, and the proposal would not harm the balance of land uses – indeed it would add a hotel use on what is already a mixed use site.

93. Policy P40 of the draft NSP supports hotels where the design, scale, function, parking and servicing arrangements respond positively to local character and protect amenity and does not direct hotels to any particular areas; these matters are considered in the different assessment sections below. In terms of the second part of NSP policy P40 (which requires 10% of the floor space as ancillary facilities), the ground floor reception of approximately 350sqm is proposed as a publicly accessible area open to hotel guests and the community with wi-fi and meeting spaces available to the public in the front of house area. This area represents only 5% of the total hotel floor area, however the separate affordable workspace unit, public realm and replacement retail unit would add further activity to the site with a variety of uses. The proposal is considered to have sufficiently addressed this draft policy, which cannot yet be given significant weight as the NSP has not been through its Examination in Public.
94. In terms of the draft NSP site allocation (NSP14, listed as NSP15 in the earlier version), it does not list hotels as a required or suitable use. The draft allocation states that redevelopment 'should' provide housing, which the current application does not do. This formed one of the council's reasons for refusal of the previous scheme, and evidence was provided on this issue at the public inquiry, including in the statements by local residents and ward member. The Inspector's report made the following comment:  
*"There is no scheme to demonstrate that the car park alone could be suitable for any significant amount of housing development and the owners have expressly ruled out redevelopment for housing. The existing office has been recently refurbished, and is unlikely to be redeveloped soon, so there is very little prospect of housing development on the site in the foreseeable future. While there could be conflict with the allocation in emerging policy NSP15 of the draft submission version of the New Southwark Plan 2017, which stipulates that development proposals for the wider site should include housing, as this is unlikely to happen, even over a 15 year timespan, and as the policy is far from adoption, this conflict should be given limited weight."*
95. The Inspector concluded that a housing development on the site is unlikely to be deliverable in the foreseeable future and the draft site allocation should be given limited weight. It is also noted that the applicant has made representations during the consultation on the NSP's draft site allocation, particularly that as the applicant owns the long leasehold of the recently-refurbished office building and considers it would not become available for redevelopment soon. Therefore the applicant is of the view that only the car park part of the site would come forward for development during the lifetime of the NSP, rather than a comprehensive redevelopment of the site allocation area, and the site allocation is therefore not reasonable nor deliverable.
96. In its response to the consultation comments received to the NSP, the council has replied as follows:  
*"The site has been a proposed development site in the emerging New Southwark Plan since the February 2017 Proposed Submission Area Visions and Site Allocations document and has been through two rounds of consultation. The site allocation is*

*written assuming comprehensive redevelopment of the whole site. Therefore, it assumes a mix of uses could be provided, requiring the re-provision of employment uses in line with other policies in the CAZ. The site allocation is not too prescriptive, and provides flexibility for development to incorporate a range of employment generating uses, in particular, the provision of active frontages with ground floor town centre uses A1, A2, A3, A4, D1, D2. The requirement for the re-provision/provision of employment floorspace (B class) is in conformity with the NPPF as it seeks to meet the development needs of the area.”*

97. Given the applicant's objection to the draft site allocation, this would need to be considered further during the examination in public of the NSP prior to the adoption of a final site allocation. The objection to the detail of the site allocation also means the draft policy can be given only limited weight.
98. In light of the Inspector's comments and the weight of support in adopted plans for hotel use on sites such as this, and in the absence of any other material considerations to suggest that a hotel use would not be appropriate here, the failure to comply with the emerging NSP site allocation (by providing a hotel and not including housing) is considered not be a sound reason to withhold permission. It is noted that the allocation has not gained any significant additional weight since the Inspector's decision was issued on the appeal (in October 2019).
99. When taking account of the weight of support in London Plan policy 4.5 'London's visitor infrastructure' (as the adopted policy, with full statutory weight) for hotels in the CAZ and Opportunity Areas, the importance of tourism to London's economy, and the recent appeal decision, the proposed hotel land use is considered to be acceptable in principle.

#### Office (Class B1)

100. A key objective towards achieving sustainable development is building a strong, competitive economy through securing economic growth. Policies 4.1 and 4.2 of the London Plan promote the contribution made by central London to London's economic success and support developments which meet the needs of the central London office market. At the local level, Strategic Policy 10 of the Core Strategy aims to protect existing business space and support the provision of up to 500,000sqm of additional business floorspace in the Bankside, Borough and London Bridge Opportunity Area. Saved policy 1.4 of the Southwark Plan requires existing office floorspace to be reprovided when sites are redeveloped. The Blackfriars Road SPD encourages new jobs and businesses along Blackfriars Road area to help consolidate and expand the existing business cluster and reinforce the area as a strategic office and employment location. New business floorspace is encouraged and existing business floorspace is required to be retained or replaced.
101. The existing building on the application site provides Class B1 office floorspace and this would be retained, and the reception area extended by approximately 90sqm. The construction of the hotel would not undermine the functioning of the office block, whose servicing capacity would be retained (the impact on amenity is considered separately in the assessment later in this report). The proposed new ground floor unit that may be used for affordable workspace is considered separately below.
102. In terms of the draft NSP site allocation, the proposal would retain the floorspace within the existing office building and enlarge its reception area. The proposal therefore meets the requirements of this emerging designation in that at least the amount of employment floorspace currently on site would be retained, and at least



50% of the total development on the site would be employment floorspace.

Affordable workspace (Class B1) or community use (Class D1)

103. The application proposes the new rear ground floor unit, between the hotel reception and Friars Yard, be used either for affordable workspace (Class B1 use – such as artist studio or creative space) or community use (as a form of Class D1 non-residential institutions).
104. As set out above, there is policy support for increased office provision in this area, and for affordable space in the draft London Plan (policy E3) and New Southwark Plan in policy P30. The 223sqm of affordable workspace would be welcomed as a benefit of the scheme and meets policy objectives of increasing the number of jobs in Southwark. It could be secured as affordable workspace through a legal agreement if the unit is used for Class B1 use. Discussions between the applicant and organisations who have expressed strong interest in taking on this unit are on-going. The applicant has stated it is committed to a discounted rent of £20/sqft (indexed link and excluding service charge) which it considered to be an approximately 65% discount on open market rents for this area (of circa £60-65/sqft) to ensure that the space is truly affordable for the intended occupiers. This percentage reduction is larger than the minimum discount that would be sought usually, and the applicant is keen to show that this reflects its commitment to ensure that a local business can take on the unit. It is noted that there is no policy requirement to provide affordable workspace here however, since the offices are not being significantly expanded or redeveloped as part of the application. Therefore, if the developer decided to instead bring forward this space for Class D1 use, then this would not raise any policy conflict with emerging policies on affordable workspace.
105. If the unit is used for Class D1 use, there is policy support in the Southwark Plan (policy 2.2), Core Strategy (policy 4) and London Plan (policy 3.16) for community facilities. The use as a community space is also welcomed, and the applicant has been in discussed with organisations in the area as to what the unit could be used for, e.g. hosting meetings and events, group lunches, cultural events or gallery space. The unit would be accessible. The exact Class D1 use has not been proposed by the applicant, and given the range of uses this Class contains, it is considered appropriate to exclude certain uses that would likely raise amenity issues (e.g. its use as a school, nursery or a place of worship) from noise or traffic that would need to be assessed in more detail in a separate application.

Retail (Class A)

106. The existing building has two Class A retail units on the ground floor accessed from Blackfriars Road that would be removed in the proposal. The proposal would provide one retail unit that would front Blackfriars Road and the new Friars Yard, but with a loss of retail floorspace compared with the existing two units (a reduction of approximately 130sqm) because of creating the route through to the hotel. Saved policy 1.7 'Development within town and local centres' seeks to retain and replace Class A floorspace, unless the proposed use provides a direct service to the public, and the proposal would not harm the retail vitality and viability of the centre.
107. This reduction in Class A use would not harm the vitality of the other retail units in the site (currently occupied by Sainsbury's and Pret), and the scale of this loss within the designated Blackfriars town centre and CAZ would not cause harm to the vitality of these wider areas. The loss of retail floorspace has to be balanced with the proposed addition of affordable workspace or community use, small increase in office space,

and hotel use in this application which would be in line with the aspirations of the SPD.

#### Jobs and spending

108. The applicant estimates that hotel guests would spend £8.9m per year, a proportion of which would be in the local area. The applicant also estimates that the proposal is expected to result in 75-98 full time equivalent jobs from the hotel, workspace and replacement retail unit. The Section 106 Planning Obligations and CIL SPD sets out the requirements for local training and opportunities during construction and completed developments, and for the use of local businesses, and these requirements would be secured in a legal agreement.

#### Conclusion on land uses

109. The location of the site within the CAZ, a town centre, an Opportunity Area, and with excellent access to public transport, meets the requirements of regional and local plans for development of hotels. There are a number of existing and planned hotels in the Bankside and Blackfriars Road area, however one further hotel would not over-dominate to the extent that hotels would harm the character of the area or its vitality, in line with the recent Inspector's report. Given the clear conclusions in the recent Inspector's decision, and in the absence of any change in the development plan since that time, it would not be reasonable to refuse planning permission for the current scheme based on the over-dominance of hotels, or the failure to include housing on the site. The local training and opportunities would be secured in a planning obligation. The function of the retained office block would not be adversely affected. There is a small reduction in Class A floorspace, but this would be balanced by the introduction of affordable workspace or community use and hotel use on the site. The proposed development should therefore be supported in land use terms.

#### **Environmental impact assessment**

110. The European SEA Directive is transposed into UK law by the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2017. The Regulations set out the circumstances under which development needs to be underpinned by an Environmental Impact Assessment (EIA). Schedule 1 of the Regulations set out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development for which an EIA might be required on the basis that it could give rise to significant environmental impacts. Schedule 3 sets out that the significance of any impact should include consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.
111. The scale of development proposed by this application does not reach the minimum thresholds established in the Regulations that would otherwise trigger the need for an EIA. The proposal's location and its nature do not give rise to significant environmental impacts in this urban setting sufficient to warrant a requirement for an EIA. An EIA for this proposed development is not required. It is noted that the same conclusion was reached in the previous 2018 application for a larger hotel development on this site.

#### **Design**

112. The NPPF emphasises the importance of good design and states in paragraph 124 that: "*Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.*"

113. Chapter 7 of the London Plan sets out the policies relating to design matters. In particular, policy 7.1 sets out the design principles required for new development and policy 7.6 requires that architecture should make a positive contribution to the public realm, streetscape and cityscape. Policy 7.8 asserts that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.
114. Policy SP12 of the Core Strategy states that *“Development will achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.”* Saved policy 3.12 of the Southwark Plan asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. When considering the quality of a design, the fabric, geometry and function of the proposal are included as they are bound together in the overall concept for the design. Saved policy 3.13 states that the principles of good urban design must be taken into account, including the height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.
115. Objections were received to the scale and design of the proposal having not changed sufficiently from the refused scheme, still being too much for this site, and the architecture being bland. As set out below, the design of the proposal is considered to be acceptable.

#### *Background*

116. This proposal follows the refused application and dismissed appeal for 10-storey hotel building at the rear of the large office block fronting Blackfriars Road. This was refused by the council on the grounds of:

*“adverse impact on the townscape by virtue of its excessive height relative to existing building on the main Blackfriars Road frontage. The hotel would be defined as a tall building by virtue of its height exceeding 30m but is not located at a point of landmark significance as required by Policy 3.20 of the Southwark Plan.”*

117. In dismissing the appeal, the Inspector’s report focused on the visibility of the building over the top of the Blackfriars Foundry (a non-designated heritage asset) on Webber Road and on non-compliance with the tall building policy 3.20 of the Southwark Plan.

#### *Scale and townscape*

118. This revised scheme has reduced in height to 8-storeys and now comes comfortably under the 30m threshold at which buildings are deemed by saved Southwark Plan policy 3.20 to be ‘tall’. Alterations have been made to the footprint of the new building at ground floor level and to adjacent courtyards, and the previously proposed roof pergola to the existing office building has been omitted.
119. The proposal is large for an extension building but would be subservient to the larger frontage office building and would read as part of a coherent and enlarged whole. The scale of the building is now such that the upper parts of the building would only just be visible above the Foundry when viewed from Blackfriars Road and the western part of Webber Street, at a much reduced height and massing than the refused scheme. It would not dominate or take away from the presence of this smaller heritage building in the way that the previous proposal did. In other viewpoints within the surrounding

townscape the extension would be visible mainly as a fairly distant object that is similar in scale to the office building and adjoining halls of residence. The reduction in height is a significant, positive change from the refused scheme.

120. The proposal remains close to its north-eastern boundary with the adjacent school. The views from within the school grounds are not public viewpoints and the extension's scale has been reduced such that it is similar to the neighbouring halls of residence.
121. In conclusion, the proposal is acceptable in height and townscape terms and does not breach the council's building heights policy.

#### *Architecture*

122. Apart from plant enclosure on the roof, the facades of the extension are to be constructed in brick. Unlike the refused scheme there would be no decorative top to the building (referred to as a "veil"), nor a variety of materials. This quieter façade concept is appropriate given the proposal's location at the rear of the wider site.
123. The need for a repeated hotel layout of bedrooms can produce repetitive facades. In this scheme, this is avoided by the pairing of windows within triple and double height recessed bays. The windows are recessed again within their own reveals and decorative brick spandrel panels would add further variety. This concept is inspired by the traditional warehouses in Southwark, albeit stripped down and at a larger scale. This concept is appropriate for Southwark and the depth and texture that would be imparted by the detailing is welcomed. The building would be markedly more interesting than the adjacent, rather plain student halls of residence building, and the rear of the office building.
124. The proposed changes to the existing frontage building have been reduced since the appeal scheme. The rather inelegant entrance 'gantry' of the previous scheme has been replaced by a simple, large projecting canopy over the main entrance leading to the rear hotel extension and its associated courtyards. This entrance concept is more in sympathy with the 1960s architecture of the frontage building and is welcome.
125. The extended roof terrace would be surrounded by a simple balustrade that would not be prominent in public views from ground level. Access to it is by stairs only from the top floor level at present, and no lift access to the roof terrace is proposed which is disappointing in that it would remain inaccessible to those unable to use stairs. However, being an extension to an existing terrace, this is considered not to be a sound ground for refusal.
126. The changes to the stairs and ramps along Blackfriars Road would improve this public frontage, and ensure the ground floor entrances to the various units remain accessible, and with an improved appearance compared to the existing.

#### *Courtyard public realm*

127. The placement of the rear building creates and defines the outdoor courtyard (Friar's Yard) and the enclosed link from Blackfriars Road. Both have a strong landscaping concept and mix of surrounding uses that would add activity and vitality to this aspect of the scheme.

*Impact on heritage assets*

128. The nearest heritage assets to the site include the following:
- the grade II listed Albury House and Clandon House – 50m to the south-east of the site on Boyfield Street.
  - the grade II listed Peabody Buildings – 40m to the south-west side of the site on Blackfriars Road.
  - the grade II listed Ripley, Chadwick and Merrow Houses on Rushworth Street (100m to the east of the site), and the Drapers Almshouses on Glasshill Street (130m to the east).
  - the grade II listed Former Sons of Temperance Friendly Society Building, 60m to the north on Blackfriars Road.
  - the Valentine Place Conservation Area 30m to the west, and the King's Bench Conservation Area 50m to the north-east.
  - the Blackfriars Foundry (on the corner with Webber Street) is considered to be a building of townscape merit.
129. Due to the scale of the 8-storey building and its position to the rear of the office block, which would shield it in views from many approaches, it would not have a harmful impact on the setting of most of these heritage assets. The verified views in the submitted Townscape and Visual Impact Assessment show the massing of the building to be wholly or partially screened from most of the tested view points. For example it would not be visible from the views in Valentine Place Conservation Area, Kings Bench Conservation Area or St George's Circus Conservation Area.
130. The changes made since the refused scheme with the reduction in height by two storeys, the change in façade design and materials, and by setting the top storey in to give articulation to the top floor, mean that the current proposal would not cause harm to the setting of the non-designated heritage asset of The Blackfriars Foundry. This successfully addresses another reason for the appeal dismissal. The visuals below compare the previous scheme, with the current scheme. The visuals are taken from slightly different viewpoints which affect the perspective, however the reduction in the height of the scheme is clear.



*Image of the 2018 scheme*



*Image of the current scheme (taken from a slightly different viewpoint)*

131. In terms of other heritage assets in the area, the hotel building would be visible from

near listed Albury House on Boyfield Street. This listed building is a LCC housing block completed in 1897; its significance lies in its character as an example of late 19th century social housing and its arts and crafts detailing. From the street, the appearance of this modest 3-storey block is characterised by the horizontal access walkways leading to the housing on every level. Its roof line is articulated by the gabled ends of the block and the gabled centre feature. The listing description highlights the importance of the rear facade as the facade with greater merit. The building and Clandon House are experienced from Boyfield Street as a set piece and together they give the street a strong sense of enclosure. More modern buildings in the area are also visible to the north and the south of Boyfield Street, and do not affect the viewer's ability to identify and appreciate the listed buildings. Based on the townscape views submitted, from the southern side of Boyfield Street the proposed development would be visible above the northern part of the listed building, and when closer to the listed building would be seen alongside the northern gable of Albury House. The Inspector commented on the previous scheme that "*their significance is not dependent on an extensive setting, the hotel would be at some distance, and the existing offices are already visible in the settings. On this point I find no demonstrable harm or conflict with relevant preservation policies.*" The current proposal is also considered to cause no harm to the setting of this listed building.

132. The revisions made since the refused scheme to reduce the height and change the façade design have successfully addressed the design and heritage impact reasons for the dismissal of the earlier scheme. Conditions for materials and construction details are recommended to ensure the design quality continues through to the build. Subject to the conditions, the proposal would comply with policies 7.4, 7.5 and 7.6 of the London Plan, Core Strategy policy 12, and saved policies 3.12 and 3.13 of the Southwark Plan.

#### **Quality of accommodation**

133. The council refused the previous scheme in terms of the "*poor quality and sub standard visitor accommodation as a result of providing hotel rooms with no access to natural light and ventilation*" which would be contrary to London Plan policy 4.5 "London's Visitor Infrastructure", as 23% of the proposed rooms had no window. The Inspector concluded that "*the size and lack of windows alone should not be a bar to this development*", therefore this did not form part of the reason for dismissing the appeal.
134. Most bedrooms within the current scheme would have a window to provide daylight and outlook, except for two ground floor bedrooms (equating to 1.2% of the scheme) that would have one rooflight each. Two bedrooms per floor in the main building (14 in total) would face each other across a lightwell at a distance of only 2.8m, which would limit their daylight, outlook and privacy. However, the changes to the scheme result in an overall improvement on the refused scheme in terms of the quality of accommodation. The bedrooms would all be ensuite, sized at 13-14sqm for the standard rooms, 15-16 for ambulant disabled rooms, and 18sqm for the wheelchair accessible rooms.
135. To address the air quality in the area, mechanical ventilation would be needed to the bedrooms, and a condition to require further details is proposed in line with the comments from the environmental protection team.
136. In terms of accessibility, the ramps to Blackfriars Road would provide level access to the new hotel, workspace/community unit, retail unit and public realm, and these would have level entrances. Within the hotel, 10 rooms (5.9%) would be sized and laid

out to be wheelchair accessible and a further 13 (7.7%) as ambulant disabled rooms, which would be larger than the standard rooms. Two lifts would provide level access throughout. The route from the basement blue badge parking spaces to the hotel is long and would require the wheelchair users to use the car lift to get up to ground level, and a long route around to the hotel entrance, alternatively the applicant has suggested a valet parking service might be used. Further details of this would be required by a condition.

137. The design has given sufficient consideration to accessibility, and would overall provide an acceptable quality of accommodation for visitors. Considering the Inspector's comments, and the improvements to the quality of accommodation in this revised scheme, it would not be reasonable to refuse permission due to the quality of accommodation.

#### **Impact of proposed development on amenity of adjoining occupiers and surrounding area**

138. Core Strategy policy 13 "High environmental standards" seeks to avoid amenity and environmental problems. Saved policy 3.1 "Environmental effects" of the Southwark Plan seeks to prevent development from causing material adverse effects on the environment and quality of life. Saved policy 3.2 "Impact on amenity" of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity to present and future occupiers in the surrounding area, or on the application site.
139. References to the loss of privacy, daylight and sunlight were made in the objections received, and to the increased noise and disturbance from the hotel use and during its construction.

#### Outlook and privacy

140. The nearest residential properties to the proposed development are located to the south at The Priory (47-55 Webber Street) and The Bell (57 Webber Street). The flank elevation of the proposed hotel immediately adjacent to these neighbours does not contain any windows and as such would not result in any direct overlooking or loss of privacy. Furthermore, the closest point between the multi-storey part of the hotel and the nearest residential property is 16.3m and although this is less than the 21m set out in the Residential Design Standards SPD, the opposing facades are set at an angle which together with the 16.3m separation distance would ensure that there is no detrimental loss of privacy. Acceptable levels of outlook would be retained as the separation distances involved are sufficient to ensure there would be no significant sense of enclosure.
141. The single storey part of the proposal that extends to the south-eastern part of the site would be closer to the Webber Street neighbours, especially no. 45 and The Priory. These structures have been kept at a low height close to the boundary, and mainly would be 3.9m high but step down in height to 2.7m closest to the rear garden of The Priory. The cycle store is shown to be 2.5m high. These measures are sufficient to prevent an overbearing impact to these southern neighbours.
142. The proposed façade of the hotel would be 8.2m and 5.6m from the southern wing of Manna Ash House at the closest points. The facades of the relevant part of hotel have no bedroom windows, there is one window per floor in the stair core which would be infrequently used and as such there would be no significant loss of privacy or overlooking. In terms of outlook, the close proximity of the hotel to Manna Ash House



would affect one bedroom and one shared kitchen/dining space on each floor. The bedroom is affected to a lesser degree as views west/north west would be unimpeded. The shared kitchen/dining space does not have the potential for other views however this is a space that is in temporary use throughout the day for meal preparation and eating as opposed to a living space that is seen in a cluster flat. On balance, the impact on Manna Ash House is considered acceptable, as it was for the taller proposal in the previous application.

143. The closest windows of Friars Primary School would be at a distance of 17.2m from the nearest hotel façade, and officers consider that this would ensure no significant overlooking or loss of privacy, and retain a suitable level of outlook for the school. There would be some overlooking of the playground (as already from the offices on the site, Manna Ash House, Webber Street and Rushworth Street properties) but this is considered to be a fairly typical urban relationship and would not be harmful.
144. The proposed hotel windows would mainly face away from the offices on the site; those that do face square onto the windows would be 16.5m away, while those at 90 degrees would afford obtuse views at 13m away. While the council does not have a recommended distance between non-residential uses, these are considered to be sufficient, and would not cause significant harm to the function of these offices.
145. Separation distances between the proposed hotel and the business centre at the Blackfriars Foundry would be 7.6m. There would be no direct overlooking from the upper floors as the closest hotel facade would have no windows. Additionally the relatively limited depth of the hotel facade at this point means that the impact on these properties as a result of the proximity of the hotel would be more limited. At ground floor, the 3 windows in the Foundry on the boundary would be retained; these currently look onto the retail terrace so while the Friars Yard is likely to have more public use, the views into these boundary windows are considered not to cause a significantly loss of amenity to the commercial use.

#### Daylight

146. A daylight and sunlight report has been submitted which assesses the scheme based on the Building Research Establishment's (BRE) guidelines on daylight and sunlight.
147. The BRE guidance sets out the rationale for testing the daylight impacts of new development through various tests. The first is the Vertical Sky Component test (VSC); this considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of the original value before the loss is noticeable.
148. The second method that can be used is the No Sky Line (NSL) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight distribution within a room may be affected.
149. The following residential properties were assessed as part of the submitted daylight and sunlight assessment:

- Globe View House (169-173 Blackfriars Road)
- The Bell (57 Webber Street)
- The Priory (47-55 Webber Street)
- Bridgehouse Court (109-115 Blackfriars Road)
- The Crown (Public House)
- Tadworth House
- Sharpley Court.

#### Daylight (VSC test)

	<b>Total windows tested</b>	<b>Windows that pass</b>	<b>Windows that fail</b>
Globe View House	110	102	8
The Bell	17	17	0
The Priory	27	27	0
Bridgehouse Court	36	36	0
The Crown	8	8	0
Tadworth House	91	88	3
Sharpley Court	12	12	0
<b>Total</b>	<b>301</b>	<b>289 (96%)</b>	<b>11 (4%)</b>

#### Daylight (daylight distribution no sky line – NSL test)

	<b>Total rooms tested</b>	<b>Rooms that pass</b>	<b>Room that fail</b>
Globe View House	57	48	9
The Bell	13	13	0
The Priory	15	15	0
Bridgehouse Court	12	12	0
The Crown	4	4	0
Tadworth House	44	44	0
Sharpley Court	12	6	6
<b>Total</b>	<b>157</b>	<b>141 (90%)</b>	<b>15 (10%)</b>

#### Globe View House

150. This building has residential flats on part of the ground floor and on all upper floors. 110 windows have been assessed at this property, 102 of the windows would meet the BRE guidelines (93% compliance). The remaining eight windows have low baseline VSC levels due to the deep balconies above these windows, with the highest existing VSC level being 5.35%. Therefore any reduction in the VSC level would be a disproportionate percentage reduction. While these windows would see VSC proportional reductions of between 22.5% and 36.4% the actual VSC changes would be between 0.35 and 1.76, which is unlikely to be noticeable to occupiers. The reduction in the height of the proposal from the previous scheme has reduced its VSC impacts to this neighbouring property.
151. Nine rooms located on the first, second and third floors would experience a reduction in daylight distribution (NSL) of more than 20%, however only five of these rooms would have windows where the VSC is also noticeably affected. Most of these rooms

are set below balconies. Given the VSC reductions are low in real terms, officers consider the impacts to be acceptable and that the development would not result in a detrimental loss of daylight at this building sufficient to warrant withholding permission.

The Bell, 57 Webber Street

152. The windows and rooms assessed at this property would experience some reduction but all pass the VSC and NSL tests.

The Priory, 47-55 Webber Street

153. The windows and rooms assessed at this property would experience some reduction but all pass the VSC and NSL tests.

Bridgehouse Court, 109-115 Blackfriars Road

154. The windows and rooms assessed at this property would experience some reduction but all pass the VSC and NSL tests.

The Crown Public House

155. The windows and rooms assessed at this property would experience some reduction but all pass the VSC and NSL tests.

Tadworth House

156. 88 windows would experience a reduction in VSC but at levels within the guidance; the remaining three windows are affected by a projecting balcony above and so have low VSC levels (existing VSC values of 1.86-3.8) so that any reduction represents a high percentage change. All rooms pass the NSL test. Taking the two tests together, the impact of the proposed development on the daylight of this building is considered acceptable.

Sharpley Court

157. Sharpley Court has commercial use at ground and first floor and residential use to its upper floors. The applicant has tested the windows on the second floor only as these will present a worst case scenario for the residential units (and windows on the third to fifth floors would be less affected). All of the second floor windows assessed would retain VSC levels that are compliant with the BRE. In terms of NSL six living/kitchen/dining rooms would be noticeably affected for their daylight distribution (i.e. there is more than a 20% reduction in the current area of the room that receives direct sunlight) of between 20.8% and 34.5%. This is likely due to the long depth of these rooms and the projecting balconies above the windows. When considered with the compliant VSC levels to the windows, and noting that the Inspector did not dismiss the taller appeal scheme for this reason, the impact of the development on Sharpley Court's daylight is considered not to be a justifiable reason for refusal of this scheme. It is noted below that it would retain good sunlight levels.

Sunlight

158. The same residential properties were tested for the sunlight hours to the windows, where those windows face within 90 degrees of south. A window would fail the sunlight test where all three criteria are met:
- The window would receive less than 25% of annual probable sunlight hours or 5% of winter hours; and

- It would experience more than a 20% reduction in current hours and;
- The absolute reduction in annual hours would be more than 4%.

159. The results are summarised in the table below for annual probable sunlight hours and winter sunlight hours.

	<b>Total rooms tested</b>	<b>Rooms that pass both annual and winter hours tests</b>	<b>Rooms that fail annual hours</b>	<b>Rooms that fail winter hours</b>
Globe View House	55	55	0	0
The Bell	-	-	-	-
The Priory	4	4	0	0
Bridgehouse Court	-	-	-	-
The Crown	4	4	0	0
Tadworth House	13	13	0	0
Sharpley Court	12	12	0	0
<b>Total</b>	<b>89</b>	<b>89 (100%)</b>	<b>0 (0%)</b>	<b>0 (0%)</b>

160. The detailed results provided for Globe View House show that rooms at the lower levels facing the site have very low sunlight hours currently of 5 to 7 hours in both the annual and winter tests, which makes the reductions to 3 to 5 hours a high percentage change, however the rooms still pass the BRE test as the reduction in values is not by more than 4% (which is the final criteria that must be met for a noticeable reduction). This reduction in sunlight is considered not to cause such harm to the amenity of these properties as to warrant refusal, particularly as the appealed application for a taller scheme was not dismissed for this reason.

#### Hambridge House

161. The eight new flats in the recent redevelopment of the former caretakers house of Friars Primary School (now called Hambridge House, 59a Webber Street) have not been included in the daylight assessment. However given their distance from the multi-storey part of the proposal, and as the nearer neighbouring properties of 57 Webber Street would not experience a significant reduction in daylight, the proposal is unlikely to significantly reduce the amenity of these new residential properties. The proposal would not affect the sunlight to these new units as the site is to the north of Hambridge House.

#### Friars Primary School

162. The applicant has undertaken a daylight and sunlight assessment to better understand the potential impacts on the school. This has taken the same form as the assessment of the residential properties by considering VSC and NSL. 34 windows serving six rooms have been assessed. Four windows would see reductions of more than 20% VSC, in all instances the windows serve two rooms that benefit from multiple windows that would continue to receive BRE compliant VSC levels, and would retain good average daylight factors.

163. The sunlight assessment demonstrates that all rooms would continue to receive good

levels of sunlight. As well as the daylight and sunlight impacts to the building the applicant has assessed the overshadowing to the playground area which is not covered by the canopy, in particular the spaces that are assumed to be used by the nursery closest to the application site. The proposal would overshadow parts of the playground from midday onwards.

164. The results demonstrate that the main nursery space that would continue to receive at least two hours of sunlight on 21 March, changing from the current 68.1% to 54.6%. As at least half of this area retains two hours of sun on ground, this accords with the BRE criteria. The main playground on the eastern side of the school would continue to receive good sunlight as well.
165. The Inspector noted that the loss of daylight and sunlight to the school were “not sufficient to outweigh *the general benefits of a substantial development in a prime location*”. Officers consider that the daylight, sunlight and overshadowing impacts to the school are acceptable and would not materially harm the operation of the school or the use and enjoyment of the spaces.

#### Noise and disturbance

166. The use of the site for an increased quantum of commercial floorspace and in particular for use as a hotel is not anticipated to result in any significant additional disturbance to residents. People arriving and leaving the hotel would use Blackfriars Road which is a major central London thoroughfare, with only those using the basement parking using the Pocock Street access. It is noted that servicing would take place from the rear and that this would be an increase on the current servicing requirements of the site however officers, in consultation with the council’s transport team and environmental protection team, are satisfied that this would not lead to additional disturbance and can be adequately controlled by conditions. Conditions will also be imposed on the hours of use for the replacement retail unit, and the expanded office terrace. The roof terrace would be for the sole use of the existing office building and conditions will ensure that it is not used after 22:00.
167. The submitted noise assessment considers the likely noise from plant within the proposal, and sets design criteria for the plant (which has yet to be selected) to ensure it does not cause harm to neighbour amenity. Further information of the plant would be required by condition to ensure the necessary mitigation is included to achieve acceptable noise levels. The Class A3 and Class D1 uses of the ground floor units may raise noise issues, so a sound insulation condition is also proposed. Similarly conditions are proposed regarding kitchen extraction plant to prevent odours, and any external lighting to minimise impacts to neighbours.
168. The submitted Construction Environment Management Plan was reviewed by EPT, and it would need to be amended before it would be acceptable. A planning obligation is proposed to require a revised CEMP to be submitted for approval prior to works starting.

#### Conclusion

169. The previous, taller scheme was not dismissed at appeal for its impact on the amenity of surrounding properties. This revised proposal, with a reduced massing, would not cause significant harm to the amenity of surrounding residential and non-residential properties, subject to conditions regarding plant noise, hours of use and servicing hours. Subject to the conditions referred to above, the proposal would comply with Strategic Policy 13 of the Core Strategy, and saved policies 3.1 and 3.2 of the

Southwark Plan.

### **Impact of adjoining and nearby uses on occupiers and users of proposed development**

170. It is not anticipated that there would be any conflict of neighbouring uses that would have an adverse impact on occupiers of the proposed hotel, retail, office or community spaces on this site.

### **Archaeology**

171. This site lies outside of a borough designated Archaeological Priority Zone (APZ), however current industry standards for London recommend that all major planning applications over 0.5 hectares - whether in an APZ or not - should be considered for archaeological interest. Recent archaeological work to the opposite side of Blackfriars Road has revealed remains from the prehistoric and Roman periods.
172. An archaeological Historic Environment Assessment was submitted. The archaeological survival potential is assessed as high, particularly with regard to medieval and post-medieval settlement and water management. There is also a possibility that Roman deposits may survive across the central area of the site (where the basement is proposed). As high archaeological potential is recognised this endorses the need for further safeguards to properly understand the nature and significance of any buried remains. On present evidence it is reasonable to expect that the site could contain archaeological remains which will inform recognised national and Greater London research objectives, i.e. non-designated heritage assets of archaeological interest in NPPF terminology.
173. The assessment shows that if archaeological remains do survive on this site, it is likely that they will survive in localised pockets in the central area. There is sufficient information to establish that the development is not likely to cause such harm as to justify refusal of planning permission, provided that conditions are applied to any consent and targeted on the central area of the site.
174. A financial contribution would also be secured for the archaeologist's monitoring and advice during the pre-commencement and construction works, in line with the Section 106 Planning Obligations and CIL SPD. Subject to this and conditions, the proposal would accord with London Plan policy 7.8, strategic policy 12 of the Core Strategy, and saved policy 3.19 of the Southwark Plan.

### **Sustainable development implications**

175. The submitted Energy Strategy demonstrates how the energy hierarchy has been applied to the proposed development in order to achieve the carbon reduction targets set out in Strategic Policy 13 of the Core Strategy and the London Plan. The Core Strategy and the London Plan also state that there is a presumption that all major development proposals will seek to reduce carbon dioxide emissions by at least 20% through the use of on-site renewable energy generation wherever feasible. In addition, the London Plan expects developments to achieve a reduction in carbon dioxide emissions of 35% over Part L of the 2013 Building Regulations.
176. The proposed development would incorporate energy efficiency measures, air source heat pumps, photovoltaic panels on the existing building and proposed building for the renewable energy component and a range of "be lean" and "be green" principles that result in an overall carbon reduction of 67% over Part L of the 2013 Building

Regulations which is fully compliant with the London Plan. The scheme includes provision for future connection to a district heating network should one become available.

177. The BREEAM pre-assessment report indicates how sufficient credits can be acquired in the subsequent design and construction phases to ensure an Excellent rating is achieved. The mandatory requirements and a score of 70.5% is indicated, with a potential score of 80.38% if further credits are achieved. This would be secured by a proposed condition, to ensure compliance with Core Strategy policy 13 for sustainable construction, and draft NSP policy P68.
178. A submitted land contamination desk study report outlines numerous historic contaminative land uses near the site. The study was revised by the environmental protection team. The proposed development would be breaking ground and contaminants may be exposed which may need to be treated. Whilst the desk study concludes there is a low risk of being significant contamination that would result in the need for major remediation, there may still to contaminants present that require treating, and further testing on site would prove this. Therefore a condition is proposed to require site investigation and risk assessment, plus the subsequent phase 1 and phase 2 assessments and verification report.
179. The site is located in flood zone 3 which is defined as having a 'high probability' of river and sea flooding and accordingly the applicant has submitted a flood risk assessment. The Environment Agency were consulted on the application and have not raised any objections subject to an informative regarding an evacuation plan. Compliance with the finished floor level would be required by a condition.
180. The surface water drainage strategy includes blue roofs to the proposed building and a below-ground attenuation tank beneath the northern part of the site, to reduce discharge rates to greenfield rates. A condition is proposed based on the advice of the flood risk management team regarding drainage, the need for investigation work and to update the basement impact assessment.
181. In terms of air quality and noise, retail, office and restaurant/bar use will take place on the ground floor and the end user/operator is not yet defined. Given the proposed range of uses and their potential for disturbance to adjacent properties, the council's environmental protection team has recommended a series of conditions aimed at protecting amenity for adjacent occupiers in order to minimise disturbance from noise and odours. The relevant conditions will be imposed on any permission and will need to be satisfied prior to any development taking place. This will include operating hours of the retail units, bar/restaurant and office terrace.
182. The removal of most of the on-site car parking would assist in reducing air pollution, and an electric vehicle charging point would be required. The submitted air quality assessment identifies the necessary mitigation measures during demolition and construction to reduce dust and air pollution. The removal of the CHP and biomass burning from the previous proposal (now replaced by air source heat pumps) would further reduce air pollution. Ventilation is needed for the hotel rooms and details would also be secured by condition, given the proximity to Blackfriars Road.
183. Subject to conditions to secure the BREEAM rating of Excellent, energy strategy measures, contamination remediation measures, flood mitigation, surface water drainage and air quality measures, the proposal would comply with policies 5.2, 5.3, 5.7, 5.9, 5.12, 5.13, 5.14, 5.15, 5.21 and 7.14 of the London Plan, policy 13 of the Core Strategy, saved policies 3.1, 3.2, 3.3, 3.4, 3.6 and 3.9 of the Southwark Plan.

### **Trees, landscaping and ecology**

184. There are some large existing trees on Blackfriars Road, and neighbouring sites contain trees (although the boundary walls are likely to have reduced root growth into the site). The council's urban forester has reviewed the application and does not consider the trees on Blackfriars Road to be a constraint to development, nor threatened by the development itself. Relevant tree protection measures are to be put in place to protect these trees and those on neighbouring sites during construction, which would be secured by condition. Landscaping conditions have been proposed to secure the additional landscaping of the site, particularly the new 280sqm Friars Yard public realm, appropriate tree pits and planting within the courtyard.
185. An ecological assessment was submitted which has been reviewed by the council's ecologist and found to be acceptable. Green and blue roofs totalling 760sqm are proposed to the existing office building, to part of the hotel roofs, and across the roof of the single storey part of the hotel. This would more than replace the 400sqm sedum roof of the existing office building which is to be removed for the roof terrace extension. Green walls are proposed to two sides of the public square. The recommendations in the report for biodiverse roofs, green walls, landscaping and swift bricks (bricks rather than the proposed boxes) would be secured by conditions to ensure the biodiversity benefits.
186. Subject to the conditions relating to tree protection measures, landscaping, green roofs, bird bricks, the proposal would comply with policies 5.10, 5.11 and 7.19 of the London Plan, policies 11 and 13 of the Core Strategy, and saved policy 3.28 of the Southwark Plan.

### **Transport and highways issues**

187. Saved policy 5.1 of the Southwark Plan seeks to ensure that development is located near transport nodes or, where they are not, it must be demonstrated that sustainable transport options are available to site users and sustainable transport is promoted. In addition, saved policy 5.6 of the Southwark Plan requires development to minimise the number of car parking spaces provided and include justification for the amount of car parking sought taking into account the site Public Transport Accessibility Level (PTAL), the impact on overspill car parking, and the demand for parking within controlled parking zones.

#### Trip generation

188. The site is located within an area of excellent public transport accessibility (PTAL of 6b) within short walking distances to both Southwark Underground and Waterloo stations as well as being situated on Blackfriars Road which is served by many cross-London bus routes and a Cycle Superhighway.
189. The applicant has estimated that the proposal would generate three and six two-way vehicle movements in the morning and evening peak hours respectively. Officer's interrogation of comparable sites' travel surveys within TRICS travel database has revealed that the hotel aspect of this development would generate a higher volume of 17 and 13 two-way vehicle movements in the morning and evening peak hours respectively while its workspace aspect would create one two-way vehicle movement in the morning and evening peak hours. It is not expected that the retail element would generate any more vehicle movements as it is of similar size to the existing.



190. Based on the council's higher trip generation estimates, the development would produce 18 and 14 additional two-way vehicle movements in the morning and evening peak hours respectively. Although these numbers of net forecasted supplementary vehicular traffic are higher than those of the applicant's consultants, officers considered that they would not have any noticeable adverse impact on the prevailing vehicle movements on the adjoining roads. The applicant's consultants have also demonstrated that the existing public transport infrastructure at this location would accommodate the public transport demand emanating from this development.
191. The applicant has proposed travel plan initiatives such as the provision of public transport information and shower and changing facilities for cyclists; this is mainly targeted at staff with the appointment of a co-ordinator and by providing visitors with information on sustainable transport modes. A contribution for fitting countdown facilities to the two bus shelters closest to the site would be secured through the legal agreement. While TfL does not agree with the trip generation the applicant has used (without a detailed assessment of key pinch points in stations and the base data from line loading), TfL does not expect the proposal to have a noticeable impact on public transport services.

#### Car and coach parking

192. Borough Controlled Parking Zone provides parking control in this vicinity on weekdays from 08:30 to 18:30. The development of the existing service yard to the rear would result in the loss of 67 car parking spaces. The five basement car parking spaces would be retained with two becoming disabled car parking spaces. This is a significant reduction in car parking in what is one of the most accessible and sustainable locations within the borough, and is supported. A condition regarding electric vehicle charging is proposed, and another regarding how wheelchair users would access and exit the basement to reach the hotel at ground level. The applicant has suggested an obligation (in response to TfL's comments) that any excess car parking would be removed, subject to the termination of lease agreements within existing office tenants.
193. There is a car club space near this site on the adjoining Pocock Street and there are loading bays on both sides of this stretch of Blackfriars Road. No on-site coach parking has been proposed, however there are three existing coach parking bays on Blackfriars Road and Southwark Street, and these spaces and a large part of the on-street space on Pocock Street plus all the delivery bays on both sides of the adjacent segment of Blackfriars Road were observed to be vacant during the transport officer's site visit. A taxi and coach management plan would be required on any permission (as part of a wider hotel management plan).
194. Occupiers of the development will be excluded from those eligible for car parking permits for the CPZ. Owing to this site's characteristics the proposed level of car parking is considered acceptable.

#### Pedestrians and cycling

195. The footway adjoining this site on Blackfriars Road is wide and connects northerly to Southwark tube station. In the southbound direction, it joins with the pedestrian routes running towards Elephant and Castle and the Imperial War Museum. This footway also links with the northbound and southbound bus stops immediately north of this site on Blackfriars Road. There are signalised crossings beside this site on the four arms of the adjacent Blackfriars Road/Webber Street junction and traffic calming measures on the segments of Pocock Street and Webber Street next to this site. There is a dedicated cycle route on the western side of this section of Blackfriars Road. There

are a number of cycle docking stations close to this site, one of which is on Webber Street.

196. There are concerns that the footway next to this site is substandard and contains uneven and broken pavement slabs, and is therefore prone to trip hazards. The alternative route to the riverside (stations and cultural attractions) via Burrell Street is also poor. Pedestrians would benefit from an additional crossing facility between the two junctions of Blackfriars Road with The Cut/Union Street and Webber Street, in the form of refuge, as these are around 300m apart.
197. The applicant has agreed to provide contributions to improvements to the pedestrian routes northwards towards the coach bays and Southwark Underground station as well as a contribution towards a new crossing point on Blackfriars Road. This financial contribution would be secured in the legal agreement. The highway works for repaving the section of Pocock Street at the junction with Blackfriars Road (with new kerb), reconstructing the vehicle crossover on Pocock Street and upgrading the street lighting would be secured through the legal agreement. This will provide a sufficient level of amenity to pedestrians and improve the public realm.
198. The proposal was amended to remove seating that was originally proposed on the Blackfriars Road frontage, in response to TfL's objection that this would reduce the width of the pavement.
199. The application proposes 26 cycle parking spaces on the ground floor for staff, guests and visitors. This cycle parking meets the standards stated in the New Southwark Plan and the draft London Plan. However the detailed type and layout of the cycle parking facilities have not been shown. A condition is recommended to ensure Sheffield stands are provided and including provision for at least one cargo bike and one disabled cycle. The applicant has agreed to make a contribution to improving cycle hire facilities in the area and these could be used by staff and hotel guests as a sustainable form of transport, which would be secured in the legal agreement.

#### Servicing

200. A survey of servicing activities of a similar hotel in 2018 that was undertaken by the applicant's consultants indicated that this proposal would generate around ten more deliveries per day, with another survey of refuse collection on this other site in the same period suggesting that four refuse vehicles per day would visit this site. An operation management plan was submitted demonstrating how coaches/taxis would be controlled.
201. The proposal retains the existing gated vehicular access at the northern end of this site on Pocock Street connecting to a new car lift to the basement level, and a service yard incorporating a loading bay and refuse bin stores on the ground floor. Vehicle swept path analysis confirms that the servicing area of this site would have ample vehicle manoeuvring space that would ensure that light vans and refuse vehicles accessing and exiting it would do so in a forward gear. In addition to this it should be noted that there is also on-street loading facilities on Blackfriars Road, which are located in close proximity to the site. A "goods in manager" would be appointed for managing the servicing and deliveries, with the hotel concierge able to accept smaller deliveries.
202. A delivery and servicing management plan would be secured in the legal agreement, along with the associated bond and monitoring fee. Further information on the management of taxis and coaches would also be secured.

### Construction phase

203. The applicant submitted a construction logistics management plan demonstrating how the construction phase of this development would be managed. The submitted management plan needs to be revised before it would be acceptable. It would need to include minimising the number of articulated lorries, agreeing crane installation method, noise and dust suppression measures, an undertaking to sweep the adjoining highway daily, daily/hourly profile of deliveries, default penalties in the form of turning away delivery vehicles not complying with scheduled delivery times and banning construction vehicles not adhering to the agreed routeing of vehicles, vehicle swept path analysis, confirmation of whether or not any of the adjacent parking bays would be suspended at any stage of the relevant building works, confirmation that contractors would subscribe to considerate constructors' scheme and have a minimum 'silver' membership of FORS plus site layout plans for each phase of the development showing loading area, operators' parking spaces, location of wheel washing facilities, vehicle entrance arrangement and on-site routeing of traffic. A revised construction management plan would be required by a planning obligation.

### Conclusion

204. Subject to the items to be secured by planning obligations in terms of the highway works, travel plan, preventing the issue of CPZ permits, and conditioning the provision of the cycle parking, EVCPs and refuse store, the proposal does not raise significant transport or highway safety issues. It would comply with transport policies in the London Plan, Core Strategy policy 2, saved policies 5.1, 5.2, 5.3, 5.6 and 5.7 of the Southwark Plan.

### **Planning obligations and Community Infrastructure Levy (CIL)**

205. Saved policy 2.5 of the Southwark Plan and policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved policy 2.5 of the Southwark Plan is reinforced by the recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic policy 14 'Implementation and delivery' of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:
- necessary to make the development acceptable in planning terms;
  - directly related to the development; and
  - fairly and reasonably related in scale and kind to the development.
206. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration, however the weight attached is determined by the decision maker.
207. The Mayoral CIL2 is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail. The levy within Central London is £185/sqm for office, £165/sqm for retail and £140/sqm for hotel use. Southwark CIL in this location has a rate of £136 per square metres for hotels, £136 for retail and £0 for office. Southwark CIL is to be used for infrastructure that supports growth with a Southwark commitment to spend at least 25% locally.

208. Based on the existing floor areas provided in the agent's CIL Form dated 12 June 2020 and proposed areas from the architects' GIA Schedule (A-0700 Rev 1, 07.02.2), the gross amount of CIL is approximately £1,796,301.91 consisting £865,293.72 of Mayoral CIL and £931,008.19 of Borough CIL. It should be noted that this is an estimate, and the floor areas will be checked when related CIL Assumption of Liability Form is submitted after planning approval has been obtained. Payment of the Mayoral CIL would accord with policy 8.3 of the London Plan.
209. The following table sets out the required site specific mitigation to be secured by a section 106 agreement, and the applicant's position with regard to each point:

<b>Planning Obligation</b>	<b>Mitigation</b>	<b>Applicant Position</b>
Archaeological monitoring	Contribution of £6,778 (indexed) towards the provision of specialist advice from the council's archaeologist, as there is high potential for remains in the site, in line with the S106 and CIL SPD.	Agreed
Affordable workspace	Securing the affordable workspace, if the unit is used for B1 space. Specification of the workspace. Marketing strategy Management plan Provision at least a 30% discount on market rent levels for 30 years.	Wants to secure the proposed £20/ sqft (indexed linked and excluding service charge) - which is a larger reduction than a 30% discount.  Question what a marketing and management plan would include given the applicant hopes to have a preferred occupier signed up and the low rental level suggested.  Agree to secure for 30 years
Car park management plan		Agreed
Construction management plan		Agreed
Employment during construction	14 sustained jobs for unemployed Southwark residents, 14 short courses and 3 construction industry apprenticeships or a payment of £66,800 for shortfall, and the associated	Agreed

	employment, skills and business support plan	
Employment in the development	11 sustained jobs for unemployed Southwark Residents at the end phase, or meet any shortfall through the Employment in the End Use Shortfall Contribution (the maximum Employment in the End Use Shortfall Contribution is £47,300, based on £4,300 per job) and the associated skills and employment plan	Agreed
Local procurement	During construction and in the end use.	Agreed
Energy Strategy	To build in accordance with the Energy Strategy.	Agreed
Hotel Management Plan	To detail the servicing and delivery arrangements, taxi and coach management, minimising noise, litter and disruption.  Delivery and servicing bond, including monitoring fee (£6,033).	Agreed
Transport improvements	£40,000 towards the provision of bus countdown facilities at bus stops on Blackfriars Road.  £68,720 towards improved pedestrian routes to the riverside and coach bays on Southwark Street and Pocock Street/Burrell Street.  £20,000 towards an additional pedestrian crossing on Blackfriars Road.  £67,000 towards cycle hire facilities.	Agreed
Public realm (on site)	Provision of the public realm on the site with planting, seating etc prior to first occupation of the hotel, its maintenance, and unrestricted public access.	Agreed
Public realm and highway works	Repave the footway including new kerbing fronting the development on Pocock Street at junction with Blackfriars Road using materials in accordance with Southwark's Streetscape Design Manual.  Reconstruct the vehicle crossover on Pocock Street using materials in accordance with Southwark's Streetscape Design Manual  Associated amendments to the Traffic	Agreed

	Management Order.	
Parking permit restriction	Occupiers will not be eligible for CPZ parking permits, except for blue badge holders	Agreed
Removal of excess car parking		Agreed
Travel Plan		Agreed
Administration charge (2%)	£3,914	Agreed

210. These obligations are necessary in order to make the development acceptable in planning terms, and to ensure the proposal accords with policies 2.5 of the Southwark Plan, Core Strategy policy 14 and London Plan policy 8.2, and the Section 106 Planning Obligations and CIL SPD.
211. In the absence of a legal agreement to secure the items and mitigation listed in the table above, the proposal would be contrary to these policies and the NPPF.
212. In the event that a satisfactory legal agreement has not been entered into by 30 September 2020, the director of planning be authorised to refuse planning permission (if appropriate) for the following reason:

*“In the absence of a signed Section 106 Agreement, there is no mechanism in place to avoid or mitigate the impact of the proposed development on public realm, transport network or employment and the proposal would therefore be contrary to Saved Policy 2.5 'Planning Obligations' of the Southwark Plan and Policy 14 - 'Implementation and delivery' of the Core Strategy, the 'Section 106 Planning Obligations' Supplementary Planning Document 2015, and Policy 8.2 'Planning obligations' of the London Plan.”*

### **Community involvement and engagement**

213. The applicant has completed the engagement summary template, which is appended as Appendix 6. Since the appeal scheme was dismissed, the applicant held a public exhibition on two days in January 2020, advertised by over 4,000 fliers sent to surrounding properties, invitations to local groups and Ward Councillors, and a newspaper advert. 37 people attended and 13 feedback forms completed. The feedback received was supportive of the community use now included and the public realm, but also that the design changes needed to go further, and echoed comments and objection topics made on the earlier application (on the oversaturation of hotels in the area, noise, traffic). A dedicated website was set up by the applicant as well. The applicant used the council's pre-application service for one meeting after the appeal decision.
214. This most recent community involvement is in addition to the consultation undertaken before the 2018 planning application and appeal.
215. Following the submission of the planning application, the council advertised it by

neighbour letters, site notices and a press notice. The objections and comments received from the local community and statutory consultees are summarised later in this report.

### **Consultation responses and how the application addresses the concerns raised**

#### Consultation responses from members of the public

216. Summarised below are the material planning considerations raised in the objections from members of the public.

#### Comments in objection

217. 22 objections were received which have been summarised as follows:

218. Insufficient changes made since the refusal:

- Minimal changes have been made since the refused scheme, and demonstrate a lack of commitment to the local area from the applicant. Most of the objections to the earlier scheme still apply. The initial application was refused for good reason, not so that a developer can come back with a few tweaks of the original proposal.

Officer response: While this remains a hotel scheme, the changes made to the height and design have successfully addressed the reasons given in the Inspector's dismissal of the earlier scheme.

219. The number of hotels in the area and there being no need for further:

- Yet another hotel is not needed. There are so many new hotels in the area - 6 within a 3-4 minute walk, plus one under construction opposite the site and another consented at St Giles, and serviced apartments and Airbnb accommodation as well – with no need for further hotel accommodation. There are already 25 existing hotels with a total of 3,659 rooms within half a mile of the proposed development and another 11 hotels with a further 1,849 rooms in the pipeline. There are a lot of competing hotels in the area for a wide range of budgets and no benefit to the community of adding another one.
- Another hotel harming the character of the area, pushing out residents and making it more like the northern end of Blackfriars Road. Hotels are ruining the architectural landscape of Borough and Bankside. Blackfriars Road has been transformed into a maze of hotels and highly priced apartments with no benefit for local residents.
- The new visitor accommodation targets of Southwark have already been met and Lambeth has already stopped approving hotel accommodation due to overconcentration.
- Potential long term disruption to tourism and hospitality caused by the Covid pandemic, and to economic needs. The demand side of the applicant's argument is now unclear and unreliable in the short and medium term. All of the assumptions on which the application is based in respect of the need demand for hotel supply in the area, are now likely to be absolutely unreliable. Policies of the GLA and Southwark Council need time to address and adapt to the post Covid world - to the extent they clarify where hotels are needed and in what form they are acceptable. There is no reason to consider this application and it should be declined until the council and GLA are able to reformulate their policies to account for these new factors, and how they influence the need / requirements for hotels in this area.
- The council must consider the needs of the area and the health and safety of immediate residents.

Officer response: There is policy support for hotels in the CAZ in highly accessible locations such as this, and the assessment section above details the number of hotels in the area. The Inspector did not agree with the council's reason for refusal of the previous scheme that adding another hotel would result in an over-concentration of hotels in the area. While the Covid pandemic has all but removed tourism in London, it will pick up again and it would be for the applicant to consider whether to build out any permission (and to do so in line with the safe construction guidance in place at the time). There is no sound reason to not determine this application.

220. Redevelopment for another use:

- A hotel is not a desirable use of scarce land.
- More weight should be given to the new NSP policies rather than dated older policies. The site has been allocated for housing in the NSP and the community needs more homes. Not building housing will worsen the housing crisis. Another comment that there is no housing crisis.
- There are much better uses for this land which would benefit the community, and not just the developers; e.g. 4-storey housing blocks, affordable housing, an expansion of the Friars Primary School, a public park or a big food market.
- The applicant itself is permanently preventing the land use designated by the council in the NSP, frustrating such objectives to achieve its own desired use.

Officer response: The ground floor unit is proposed for either affordable workspace or community use, and an area of public realm would also be provided. The policies that support hotel development in the adopted development plan have more weight than the emerging NSP policies and site designation, to which the applicant has objected, and has not had its examination in public. The Inspector's report disagreed with the council's reason for refusal of the previous scheme on not providing housing on this site.

221. Neighbour amenity:

- Harm from increased numbers of people, 24/7 noise from visitors, late-night drinking (especially outside) and deliveries, affecting residents' lives, peace and quiet.
- Loss of privacy particularly with a hotel that is occupied 24hrs a day, and outlook.
- Loss of daylight, sunlight and views of the sky from neighbouring flats (The Priory, The Blackfriars Foundry, Bell House, Sharpley Court), the primary school and student accommodation. There has been no serious attempt to address the loss of light issues as the footprint of the proposal has not changed, only its height. The light impacts to neighbouring properties in many cases breach BRE guidelines. The applicant is only able to make a case for the development on the basis of a series of technical loopholes, and does not detail the scale of the impact before such loopholes. The results for the Sharpley Court flats have not been reported on. The loss of daylight to Sharpley Court due to the long, narrow rooms is not the problem of the design of these neighbours, but of the proposed development. Sharpley Court block was approved via the planning process, and the council must therefore ensure that they receive sufficient light.
- Harm from the increased traffic during construction and once occupied. The corner of Webber Street and Blackfriars Road is already too busy and noisy.
- Noise from the use of the terrace for functions.
- Impacts on the health and wellbeing of local residents.
- Change in the airflow around the building, causing mould in neighbouring flats.

Officer response: The neighbour amenity impacts are considered in detail in the



assessment above, and found to have an acceptable impact on the daylight and sunlight levels of neighbouring properties, nor to not cause a material loss of privacy. The test results for the Sharpley Court flats are included in the submitted report and the assessment above, and the different test results are included in the appendices to the submitted report. Conditions and obligations are proposed regarding opening hours of the office terrace and servicing, the management of deliveries and taxis to reduce noise and disturbance to neighbouring properties. The routing of construction traffic and vehicles during operation would be considered in the management plans. Given the distances left between the proposed buildings and its neighbours, and it no longer being a tall building, it is considered not to cause a significant change in wind conditions in the area.

222. Impact of the proposal on the offices on the site:

- Loss of privacy to the Friars House offices which deal with confidential information, loss of daylight and sunlight which hasn't been included in the assessment. The office layout may change at any time.

Officer response: These were not reasons for refusal of the previous, taller scheme. The proposed hotel windows would mainly face away from the offices, and those that do face square onto the windows would be 16.5m away, while those at 90 degrees would afford obtuse views at 13m away. While the council does not have a recommended distance between non-residential uses, these are considered to be sufficient. There would be some loss of daylight and sunlight to the rear office windows, with the frontage windows unaffected. As an office building, the daylight and sunlight impacts have not been assessed by the applicant, and the council does not set standards for commercial buildings.

223. Construction phase impacts:

- Noise and pollution with long working hours and build length will disturb residents, the offices on the site, and the primary school. There is already a lot of construction around this site that has been going on for years.
- Already a lot of construction vehicles in the area, from early in the morning, causing air pollution. The side roads should be totally off limits to construction traffic and taxis during both the construction and operating phase, discouraging use as a shortcut.

Officer response: The CEMP would aim to reduce construction impacts, pollution, noise and disturbance, and would include construction vehicle routing.

224. Transport impacts:

- The car park isn't used currently, so a hotel would result in increased numbers of vehicles.
- Increased traffic, vehicle and servicing access to the development causing noise and air pollution.
- The Inspector specifically identified rat running as a reason for declining the application which has not been addressed in the revisions.
- The addition of the cycle lanes on Blackfriars Road has caused significant confusion with vans and lorries often backing up as they attempt to go down the cycle lane. This makes the corner noisy, polluted and dangerous. A hotel would mean that it will be a noisy and dangerous corner for 24-hours a day.
- Unless restricted to Blackfriars Road, vehicles cut through to/from Waterloo Road via Webber Street. The current number of heavy goods vehicles and taxis using Webber Street is onerous, damaging the tarmac and causing dust and dirt, and significant noise, to the residents in Valentine Place. Westbound traffic from the

site will funnel along Valentine Place (as there is no right turn from Blackfriars Road onto Webber Street, and no left turn onto The Cut), causing noise and pollution to residents on this narrow road. Restrictions are needed for the additional taxis, deliveries and construction traffic of this proposal, especially to prevent vehicles turning down Valentine Place. Harm to the Valentine Place Conservation Area from the increased traffic heading westward from the site.

- Air pollution from deliveries.
- Additional parking stress on surrounding streets from hotel residents, especially at weekends. There will be Uber drivers loitering around waiting to pick up customers.
- Additional tourists making travelling to work difficult for the local community.

Officer response: The large rear car park is under-used, but lawfully could be more intensively used; its redevelopment reduces the number of vehicles that could be housed on site, even though deliveries and taxis would still visit the site's servicing yard, basement car park or on-street bay. Management of the construction traffic (including routes) would be secured in the CEMP, and in operational phase a hotel management plan would be required (which would include taxis and deliveries) and the recommended routing for vehicles. Given the highly accessible location it is likely that most visitors and staff would travel by public transport to reach the site, with several rail, Underground and bus options near to the site. The public realm and transport improvement contributions would improve the quality of these facilities and links to the site, and are a proportionate mitigation. The proposal by itself does not necessitate a revised layout of Blackfriars Road (a TfL road). The Inspector did not refuse the scheme on transport issues, the only reference to rat running in his report being in terms of the other topics raised beyond those of the council's reasons for refusal. Measures within a legal agreement would prevent CPZ permits being issued.

#### 225. Design:

- The design is of poor architectural taste, bulky and would inelegantly contrast with the residential blocks of flats which it would overlook.
- The scale is unacceptable for such a small piece of land; the proposed awkward layout of a massive 8-storey building erected at the back of a matching size building would be a questionable use of that land, with impractical accesses for people and goods deliveries from Pocock Street.
- Hiding a hotel behind the office building is not a positive contribution to the landscape or skyline, does not create an architectural quality or significance to address tall building policies. Reducing the height merely hides the building better.

Officer response: The revised design is considered much improved from the refused scheme, and is of an appropriate height at 8-storeys (no longer a tall building in policy terms).

#### 226. Quality of the accommodation:

- Hotel rooms would have poor views and very little sunlight.
- The rooms do not meet the Mayor of London's space standards of 10.2 sqm for a 2 person room.
- At least 5 rooms per floor have no windows, other have barely any natural light which would make it a 1 star hotel, not the 3 or 4 star the applicant claims. The Mayor's Accessible Hotels Guide states that a basic accessible room should be a minimum size of 20 to 26 sqm.

Officer response: The hotels bedrooms are 13-18sqm plus the ensuite area, and the wheelchair rooms are 18sqm plus its ensuite (to give a total area of 24.5sqm). The

Mayor of London's 2010 Accessible Hotels Guide refers to draft best practice guidance in an appendix of three possible layouts from 20-45sqm. The proposed wheelchair rooms would exceed the smallest size. Only two ground floor rooms have no window (but have rooflights), the rest of the rooms do have a window. The number of stars a hotel is rated is not a planning matter.

227. Lack of benefits:

- There are no benefits to local residents. Sceptical of any benefits suggested by the developer. The outside space behind Costa and Crush will be removed, which local people enjoy in the summer.

Officer response: The proposal would bring benefits of jobs, visitor spending, public realm provision, affordable workspace or community use, and improvements to the highways and transport facilities in the area.

228. Increasing community division:

- Community division increases crime. The local community needs more investment in accessible and inclusive structures to bring the community together, and address the lack of space for the LBGTIQ+ community.

Officer response: The ground floor space is proposed as either affordable workspace or as a community space. The public realm would be open to all. The scheme would contribute towards the borough's CIL funding as well which could be used for community infrastructure in the local area.

229. Timing of consultation:

- The application and its consultation should not continue while the Coronavirus outbreak is in full swing, and due process should still be followed.

Officer response: Consultation by letters, site notices and newspaper advert began in early March ahead of the virus lockdown, and all comments received even after the end of the consultation period have been included in this assessment.

230. Non-planning matters:

- Impact on property values and rental values. Bad investment in hotels as there is decreased demand for hotels.

Officer response: these are not material planning considerations.

231. One neutral comment:

- The design looks quite dull, flat and needs more imagination. Why not build something that is consistent and in keeping with those beautiful heritage properties in the area, otherwise it will be an opportunity missed.

Officer response: The design is considered in the Assessment section above, and considered to be acceptable for this site and the surrounding heritage assets.

232. Three in support:

- Noting the design changes since the refusal as 'polite' revisions, and encouraged to see so many comments taken on board in the revisions. While a more ambitious design might be better there are few reasons to discourage development in this central location on an axial boulevard. Detailing and finishes

- will be critical. It addresses an unsightly and vacant section of road frontage.
- Impressed by the high environmental standards.
  - The pre-application involvement by the developer with the community and detail in the daylight survey showing a thorough approach.
  - It will be of benefit to the local area, and is a sensible plan for an empty car park without encroaching too much on the feeling of space.

Officer response: The design, sustainability, daylight and sunlight impacts, and public benefits are considered in the Assessment section above, and found to be acceptable.

#### Consultation responses from internal consultees

233. Summarised below are the material planning considerations raised by internal consultees.

234. Environmental protection team:

- Comments on the submitted technical reports, and recommend conditions regarding air quality, noise, contaminated land, hours of use and servicing, and construction management plan.

Officer response: Conditions to secure these technical details are proposed.

235. Ecologist:

- Considers the submitted ecology report to be acceptable and recommends conditions on green roofs, landscaping and swift bricks.

Officer response: Conditions to secure these details are proposed.

236. Flood risk management team:

- Technical comments on the need for ground investigation prior to any works commencing, the monitoring of groundwater levels prior to construction, and amendments to the basement impact assessment.

Officer response: Conditions to secure these details are proposed.

237. Highways:

- If consent is granted the developer must enter into a section 278 agreement to for the necessary highway works, and notes that Blackfriars Road is a TfL road.

Officer response: These would be secured in the legal agreement.

238. Local economy team:

- The affordable workspace is welcomed. The number of construction phase and end phase skills and employment opportunities (and financial contributions for shortfalls) would be secured in the legal agreement.

239. Comments from the highways team, environmental protection team, flood and drainage team and the ecologist have been incorporated into the assessment sections above.

#### Consultation responses from external consultees

240. Summarised below are the material planning considerations raised by external consultees, along with the officer's responses.

## 241. Environment Agency:

- Initially objected but withdrew that objection on flood levels and recommend a condition regarding compliance with the FRA.

Officer response: The condition is included in the recommendation.

## 242. London Fire Brigade:

- Requested an undertaking that access for fire appliances and adequate water supplies for fire fighting would be provided.

Officer response: The applicant has confirmed that adequate water supplies and access for the fire service will be provided.

## 243. Met Police:

- Recommends a condition regarding Secured by Design.

Officer response – the condition is included in the recommendation, and the applicant has had recent discussions with the Met Police since the application was made.

## 244. Natural England:

- Has no comment.

## 245. London Underground:

- Has no comment.

## 246. Thames Water:

- Initially commented that there is insufficient capacity in the water network (with a suggested condition), but following further discussion with the applicant has confirmed that there is capacity.
- No objection to waste water aspects and the comments on proximity to public sewers, water pressure, ground water discharge etc can be added as informatives.

Officer response: The later correspondence from Thames Water confirmed there is sufficient infrastructure capacity. Therefore, the condition has not been included in the recommendation.

## 247. Transport for London (TfL):

- Trip generation – TfL has concerns with how the trip generation assessment was carried out, but considers the forecasted trip generation would not cause significant impact on the transport network.
- Walking and cycling – welcomes the Healthy Streets audit. Cycling will be a very important mode to encourage sustainable travel, with cycle hire docking stations on Webber Street, Great Suffolk Street and Southwark station. TfL requests £67,000 as a contribution towards a new cycle hire docking station or to be used to help fund manual re-distribution of bikes in the area and to support active travel in the area.
- Cycle parking – the hotel cycle parking complies with the minimum standards of draft policy T5 of the new London Plan. Asked for the cycle parking for the existing office to be reprovided and improved. All proposed cycle parking spaces must accord with the London Cycling Design Standards.
- TfL objected to encroachment on the highway by the seating and landscaping at the front of the site. Any works to the public highway will require a s278

- agreement with TfL.
- Car parking – welcomes the removal of the car parking, the basement spaces should both have EVCP.
- A construction logistics plan, servicing management plan and travel plan should be secured on any permission.

Officer response: The applicant has confirmed that the existing cycle parking for the office is within the basement of the office (and would not be affected by the proposal). Details of the cycle parking for the new uses would be required by a proposed condition. The cycle hire contribution and documents would be secured in the legal agreement. The proposal was amended to remove the seating at the front of the site, and the works at the front are all within the applicant's site (not on the highway).

### **Community impact and equalities assessment**

248. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three “needs” which are central to the aims of the Act:

1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act.
2. The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
  - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
  - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
  - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
3. The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

249. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

250. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights

251. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

### **Human rights implications**

252. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

253. This application has the legitimate aim of providing a hotel and commercial space through the redevelopment of a brownfield site. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

**Positive and proactive engagement: summary table**

254. The council has published its development plan on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
255. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and submissions that are in accordance with the application requirements.

Was the pre-application service used for this application	Yes
If the pre-application service was used for this application, was the advice given followed?	Yes
Was the application validated promptly?	Yes
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	N/a
To help secure a timely decision, did the case officer submit their recommendation in advance of the statutory determination date?	No

**Conclusion**

256. The submission follows on from the appeal dismissed in 2019 of an earlier application which was refused by this committee in October 2018. The revisions made have successfully addressed the issues raised by the Inspector in his decision.
257. There is support in the London Plan, Core Strategy and Southwark Plan for hotels to support the visitor economy. The construction of a hotel would contribute to the supply of visitor accommodation and support the tourist industry which is important to London's economic well-being. The site meets the policy requirements for visitor accommodation, being in the CAZ, an Opportunity Area and a town centre, and has the highest level of accessibility to public transport. A hotel on this site would not result in an overconcentration of hotels to the exclusion of other land uses and so would not adversely affect the character of the area. This issue was specifically addressed by the Inspector in his report on the earlier appeal.
258. The hotel development would not undermine the operation of the existing office block, which would benefit from the improvements to its entrance. The retail and workspace/community units would support the function of the town centre, and together with the public space would be positive aspects of the proposed development.
259. The design of the building (now two storeys lower than the refused scheme and with a revised architecture) is of an acceptable scale as an extension to the existing office

building, and would not harm the setting the Foundry, nor other heritage assets in the local and wider area. The current scheme therefore addresses the Inspector's reasons for the dismissal of the previous scheme.

260. It would not cause significant harm to the amenity of neighbouring properties through overlooking or reduction in light or outlook. Conditions are proposed to secure the sustainability aspects (e.g. carbon reduction, BREEAM excellent), potential archaeological impacts, biodiversity and flood risk mitigation. Highway works and management plans would be secured by the legal agreement to ensure the development makes appropriate improvements to the local area to mitigate its impacts.
261. Subject to the proposed conditions and completion of an appropriate legal agreement to secure the necessary planning obligations, the proposal is considered to accord with the development plan and emerging policies, and it is recommended that planning permission is granted.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: www.southwark.gov.uk

## APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Relevant planning history
Appendix 4	Recommendation
Appendix 5	Appeal decision for the 2018 planning application
Appendix 6	Engagement summary for the Development Consultation Charter



**AUDIT TRAIL**

<b>Lead Officer</b>	Simon Bevan, Director of Planning	
<b>Report Author</b>	Victoria Crosby, Team Leader	
<b>Version</b>	Final	
<b>Dated</b>	29 June 2020	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>		1 July 2020

**APPENDIX 1****Consultation undertaken****Site notice date:** 10/03/2020**Press notice date:** 12/03/2020**Case officer site visit date:** 10/3/2020**Neighbour consultation letters sent:** 06/03/2020**Internal services consulted**

Design and Conservation Team  
 Transport Policy  
 Highways Development and Management  
 Environmental Protection  
 Flood Risk Management & Urban Drainage  
 Highways Licensing  
 Waste Management  
 Ecology  
 Local Economy  
 Archaeology  
 Urban Forester

**Statutory and non-statutory organisations**

Environment Agency  
 Thames Water  
 Transport for London  
 Historic England  
 London Fire & Emergency Planning Authority  
 London Underground  
 Metropolitan Police Service (Designing Out Crime)  
 Natural England

**Neighbour and local groups consulted:**

Flat 54 Stopher House 90 Webber Street  
 Flat 55 Stopher House 90 Webber Street  
 96 Webber Street London SE1 0QN  
 21 Rushworth Street London SE1 0RB  
 82 Great Suffolk Street London SE1 0BE  
 Flat 60 Stopher House 90 Webber Street  
 15-16 Rushworth Street London SE1 0RB  
 49 Surrey Row London SE1 0BY  
 Flat 52 Stopher House 90 Webber Street  
 Flat 42 Stopher House 90 Webber Street  
 Flat 43 Stopher House 90 Webber Street  
 Flat 44 Stopher House 90 Webber Street  
 Flat 41 Stopher House 90 Webber Street  
 Flat 38 Stopher House 90 Webber Street  
 Flat 39 Stopher House 90 Webber Street  
 Flat 40 Stopher House 90 Webber Street

Flat 49 Stopher House 90 Webber Street  
 Flat 50 Stopher House 90 Webber Street  
 Flat 51 Stopher House 90 Webber Street  
 Flat 48 Stopher House 90 Webber Street  
 Flat 45 Stopher House 90 Webber Street  
 Flat 46 Stopher House 90 Webber Street  
 Flat 47 Stopher House 90 Webber Street  
 Flat 6 Stopher House 90 Webber Street  
 Flat 29 Bazeley House Library Street  
 Flat 30 Bazeley House Library Street  
 Flat 19 Overy House Webber Row Estate  
 Webber Row  
 Flat 2 Overy House Webber Row Estate  
 Webber Row  
 Flat 17 Overy House Webber Row Estate  
 Webber Row

Flat 14 Overy House Webber Row Estate  
 Webber Row  
 Flat 15 Overy House Webber Row Estate  
 Webber Row  
 Flat 16 Overy House Webber Row Estate  
 Webber Row  
 Flat 8 Algar House Webber Row Estate  
 Webber Row  
 Flat 21 Algar House Webber Row Estate  
 Webber Row  
 Flat 22 Algar House Webber Row Estate  
 Webber Row  
 Flat 23 Algar House Webber Row Estate  
 Webber Row  
 Flat 20 Algar House Webber Row Estate  
 Webber Row  
 Flat 18 Algar House Webber Row Estate  
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 Flat 19 Algar House Webber Row Estate  
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 Flat 2 Algar House Webber Row Estate  
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 Flat 5 Algar House Webber Row Estate  
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 Flat 6 Algar House Webber Row Estate  
 Webber Row  
 Flat 12 Bazeley House Library Street  
 Flat 10 Bazeley House Library Street  
 Flat 11 Bazeley House Library Street  
 Flat 21 Bazeley House Library Street  
 Flat 22 Bazeley House Library Street  
 Flat 23 Bazeley House Library Street  
 Flat 20 Bazeley House Library Street  
 Flat 17 Bazeley House Library Street  
 Flat 18 Bazeley House Library Street  
 Flat 19 Bazeley House Library Street  
 94 Webber Street London SE1 0QN  
 Flat 20 59 Webber Street London  
 Flat 21 59 Webber Street London  
 Flat 22 59 Webber Street London  
 Flat 19 59 Webber Street London  
 Flat 16 59 Webber Street London  
 Block N Flat 4 Peabody Square Blackfriars  
 Road  
 Block M Flat 8 Peabody Square Blackfriars  
 Road  
 Block M Flat 9 Peabody Square Blackfriars  
 Road  
 Block M Flat 10 Peabody Square Blackfriars  
 Road  
 Block N Flat 9 Peabody Square Blackfriars  
 Road  
 Block N Flat 10 Peabody Square Blackfriars  
 Road  
 Block N Flat 11 Peabody Square Blackfriars  
 Road  
 Block N Flat 8 Peabody Square Blackfriars  
 Road  
 Block N Flat 5 Peabody Square Blackfriars  
 Road  
 Block N Flat 6 Peabody Square Blackfriars  
 Road  
 Block N Flat 7 Peabody Square Blackfriars  
 Road  
 Rear Of 207 Waterloo Road London  
 Studio 1 63 Webber Street London  
 Ground Floor 61 Webber Street London  
 First Floor 6-10 Valentine Place London  
 Basement To First Floors 4 Valentine Place  
 London  
 Second Floor 4 Valentine Place London  
 Ground Floor 6-10 Valentine Place London  
 Childrens Play Centre Tadworth House  
 Lancaster Estate Webber Street  
 Rushworth And Friars Primary School  
 Webber Street London  
 First Floor 61 Webber Street London  
 Second Floor 61 Webber Street London  
 Ground Floor Studio 63 Webber Street  
 London  
 Attic 2 Valentine Place London  
 First Floor 24-28 Rushworth Street London  
 Flat 6 Patrick Court 92 Webber Street  
 Flat 7 Patrick Court 92 Webber Street  
 Flat 8 Patrick Court 92 Webber Street  
 Flat 17 Patrick Court 92 Webber Street  
 Flat 18 Patrick Court 92 Webber Street  
 Flat 19 Patrick Court 92 Webber Street  
 Flat 16 Patrick Court 92 Webber Street  
 Flat 13 Patrick Court 92 Webber Street  
 Flat 14 Patrick Court 92 Webber Street  
 Flat 15 Patrick Court 92 Webber Street  
 Flat 5 Patrick Court 92 Webber Street  
 Second Floor 82-83 Blackfriars Road  
 London  
 Third Floor 82-83 Blackfriars Road London  
 First Floor Front 82-83 Blackfriars Road  
 London  
 First Floor Rear 82-83 Blackfriars Road  
 London  
 15 Bench Apartments 22 Kings Bench Street  
 London  
 Flat 35 Pakeman House Pocock Street  
 Flat 4 Pakeman House Pocock Street  
 Flat 40 Pakeman House Pocock Street  
 Flat 38 Pakeman House Pocock Street  
 Flat 36 Pakeman House Pocock Street  
 Flat 37 Pakeman House Pocock Street  
 Flat 28 Pakeman House Pocock Street  
 Flat 19 Pakeman House Pocock Street  
 Flat 2 Pakeman House Pocock Street  
 Flat 20 Pakeman House Pocock Street  
 Flat 18 Pakeman House Pocock Street

Flat 15 Pakeman House Pocock Street  
 Flat 16 Pakeman House Pocock Street  
 Flat 17 Pakeman House Pocock Street  
 Flat 25 Pakeman House Pocock Street  
 Flat 26 Pakeman House Pocock Street  
 Flat 17 59 Webber Street London  
 Flat 18 59 Webber Street London  
 Flat 3 Stopher House 90 Webber Street  
 Flat 4 Stopher House 90 Webber Street  
 Flat 5 Stopher House 90 Webber Street  
 Flat 2 Stopher House 90 Webber Street  
 St Alphege Church Kings Bench Street  
 London  
 50 Rushworth Street London SE1 0RB  
 47 Nelson Square London SE1 0QA  
 Flat 15 59 Webber Street London  
 Flat 5 59 Webber Street London  
 Flat 6 59 Webber Street London  
 Flat 7 59 Webber Street London  
 Flat 4 59 Webber Street London  
 Flat 23 Overy House Webber Row Estate  
 Webber Row  
 Flat 9 Overy House Webber Row Estate  
 Webber Row  
 Flat 1 Quentin House Gray Street  
 Flat 10 Quentin House Gray Street  
 Flat 8 Overy House Webber Row Estate  
 Webber Row  
 Flat 5 Overy House Webber Row Estate  
 Webber Row  
 Flat 6 Overy House Webber Row Estate  
 Webber Row  
 Flat 7 Overy House Webber Row Estate  
 Webber Row  
 Block B Flat 6 Peabody Square Blackfriars  
 Road  
 Block B Flat 7 Peabody Square Blackfriars  
 Road  
 Block B Flat 8 Peabody Square Blackfriars  
 Road  
 Block B Flat 5 Peabody Square Blackfriars  
 Road  
 Block B Flat 2 Peabody Square Blackfriars  
 Road  
 Block B Flat 3 Peabody Square Blackfriars  
 Road  
 Block B Flat 4 Peabody Square Blackfriars  
 Road  
 Block C Flat 4 Peabody Square Blackfriars  
 Road  
 215 Waterloo Road London SE1 8XH  
 227-229 Waterloo Road London SE1 8XH  
 219 Waterloo Road London SE1 8XH  
 189 Waterloo Road London SE1 8UX  
 217 Waterloo Road London SE1 8XH  
 56 Webber Row London SE1 8QP  
 38 Webber Row London SE1 8QP  
 4 Webber Row London SE1 8QP  
 40 Webber Row London SE1 8QP  
 36 Webber Row London SE1 8QP  
 30 Webber Row London SE1 8QP  
 32 Webber Row London SE1 8QP  
 34 Webber Row London SE1 8QP  
 50 Webber Row London SE1 8QP  
 52 Webber Row London SE1 8QP  
 54 Webber Row London SE1 8QP  
 48 Webber Row London SE1 8QP  
 42 Webber Row London SE1 8QP  
 44 Webber Row London SE1 8QP  
 46 Webber Row London SE1 8QP  
 233 Waterloo Road London SE1 8XH  
 Flat 9 Dauncy House Webber Row Estate  
 Webber Row  
 Flat 1 Algar House Webber Row Estate  
 Webber Row  
 Flat 27 Pakeman House Pocock Street  
 Flat 24 Pakeman House Pocock Street  
 Flat 21 Pakeman House Pocock Street  
 Flat 22 Pakeman House Pocock Street  
 Flat 23 Pakeman House Pocock Street  
 Flat 41 Pakeman House Pocock Street  
 Flat 10 Vaughan House Nelson Square  
 Flat 11 Vaughan House Nelson Square  
 Flat 12 Vaughan House Nelson Square  
 Flat 1 Vaughan House Nelson Square  
 Flat 7 Pakeman House Pocock Street  
 Flat 8 Pakeman House Pocock Street  
 Flat 54 Pakeman House Pocock Street  
 Flat 53 Pakeman House Pocock Street  
 Flat 51 Pakeman House Pocock Street  
 Flat 49 Pakeman House Pocock Street  
 Flat 5 Pakeman House Pocock Street  
 Flat 50 Pakeman House Pocock Street  
 Flat 14 Pakeman House Pocock Street  
 30 Dibdin Apartments 149 Blackfriars Road  
 London  
 31 Dibdin Apartments 149 Blackfriars Road  
 London  
 32 Dibdin Apartments 149 Blackfriars Road  
 London  
 29 Dibdin Apartments 149 Blackfriars Road  
 London  
 26 Dibdin Apartments 149 Blackfriars Road  
 London  
 27 Dibdin Apartments 149 Blackfriars Road  
 London  
 28 Dibdin Apartments 149 Blackfriars Road  
 London  
 37 Dibdin Apartments 149 Blackfriars Road  
 London  
 38 Dibdin Apartments 149 Blackfriars Road  
 London  
 39 Dibdin Apartments 149 Blackfriars Road  
 London

36 Dibdin Apartments 149 Blackfriars Road London	Block O Flat 4 Peabody Square Blackfriars Road
33 Dibdin Apartments 149 Blackfriars Road London	Block O Flat 5 Peabody Square Blackfriars Road
34 Dibdin Apartments 149 Blackfriars Road London	Block P Flat 5 Peabody Square Blackfriars Road
35 Dibdin Apartments 149 Blackfriars Road London	Block P Flat 6 Peabody Square Blackfriars Road
25 Dibdin Apartments 149 Blackfriars Road London	Block P Flat 7 Peabody Square Blackfriars Road
15 Dibdin Apartments 149 Blackfriars Road London	Block P Flat 4 Peabody Square Blackfriars Road
16 Dibdin Apartments 149 Blackfriars Road London	Block O Flat 11 Peabody Square Blackfriars Road
17 Dibdin Apartments 149 Blackfriars Road London	Block P Flat 2 Peabody Square Blackfriars Road
14 Dibdin Apartments 149 Blackfriars Road London	Block P Flat 3 Peabody Square Blackfriars Road
11 Dibdin Apartments 149 Blackfriars Road London	Block O Flat 2 Peabody Square Blackfriars Road
12 Dibdin Apartments 149 Blackfriars Road London	Block D Flat 2 Peabody Square Blackfriars Road
13 Dibdin Apartments 149 Blackfriars Road London	Block D Flat 3 Peabody Square Blackfriars Road
45 Dibdin Apartments 149 Blackfriars Road London	Block D Flat 4 Peabody Square Blackfriars Road
Flat 1 Pakeman House Pocock Street	Block C Flat 11 Peabody Square Blackfriars Road
55 Dibdin Apartments 149 Blackfriars Road London	Block C Flat 8 Peabody Square Blackfriars Road
46 Dibdin Apartments 149 Blackfriars Road London	Block C Flat 9 Peabody Square Blackfriars Road
47 Dibdin Apartments 149 Blackfriars Road London	Flat 3 Dauncy House Webber Row Estate Webber Row
44 Dibdin Apartments 149 Blackfriars Road London	Flat 19 Dauncy House Webber Row Estate Webber Row
41 Dibdin Apartments 149 Blackfriars Road London	Flat 16 Dauncy House Webber Row Estate Webber Row
42 Dibdin Apartments 149 Blackfriars Road London	Flat 17 Dauncy House Webber Row Estate Webber Row
43 Dibdin Apartments 149 Blackfriars Road London	Flat 18 Dauncy House Webber Row Estate Webber Row
52 Dibdin Apartments 149 Blackfriars Road London	28 Webber Row London SE1 8QP
Flat 10 Algar House Webber Row Estate Webber Row	9 Lagare Apartments 51 Surrey Row London
Flat 8 Dauncy House Webber Row Estate Webber Row	10 Lagare Apartments 51 Surrey Row London
Flat 5 Dauncy House Webber Row Estate Webber Row	11 Lagare Apartments 51 Surrey Row London
Flat 6 Dauncy House Webber Row Estate Webber Row	8 Lagare Apartments 51 Surrey Row London
Flat 7 Dauncy House Webber Row Estate Webber Row	5 Lagare Apartments 51 Surrey Row London
Flat 15 Algar House Webber Row Estate Webber Row	6 Lagare Apartments 51 Surrey Row London
Flat 16 Algar House Webber Row Estate Webber Row	7 Lagare Apartments 51 Surrey Row London
	16 Lagare Apartments 51 Surrey Row London
	17 Lagare Apartments 51 Surrey Row London

18 Lagare Apartments 51 Surrey Row London  
 15 Lagare Apartments 51 Surrey Row London  
 12 Lagare Apartments 51 Surrey Row London  
 13 Lagare Apartments 51 Surrey Row London  
 14 Lagare Apartments 51 Surrey Row London  
 4 Lagare Apartments 51 Surrey Row London  
 Unit 8 33 Rushworth Street London  
 30 Kings Bench Street London SE1 0QX  
 Unit 23 33 Rushworth Street London  
 17 Rushworth Street London SE1 0RB  
 Unit 14 33 Rushworth Street London  
 Unit 15 33 Rushworth Street London  
 Unit 16 33 Rushworth Street London  
 1 Lagare Apartments 51 Surrey Row London  
 2 Lagare Apartments 51 Surrey Row London  
 Block O Flat 1 Peabody Square Blackfriars Road  
 Block B Flat 1 Peabody Square Blackfriars Road  
 Block C Flat 1 Peabody Square Blackfriars Road  
 53 Dibdin Apartments 149 Blackfriars Road London  
 54 Dibdin Apartments 149 Blackfriars Road London  
 51 Dibdin Apartments 149 Blackfriars Road London  
 48 Dibdin Apartments 149 Blackfriars Road London  
 49 Dibdin Apartments 149 Blackfriars Road London  
 50 Dibdin Apartments 149 Blackfriars Road London  
 Flat 196 Applegarth House Nelson Square  
 Flat 197 Applegarth House Nelson Square  
 Flat 198 Applegarth House Nelson Square  
 Flat 195 Applegarth House Nelson Square  
 Flat 192 Applegarth House Nelson Square  
 Flat 193 Applegarth House Nelson Square  
 Flat 194 Applegarth House Nelson Square  
 Flat 203 Applegarth House Nelson Square  
 Flat 204 Applegarth House Nelson Square  
 Flat 205 Applegarth House Nelson Square  
 Flat 202 Applegarth House Nelson Square  
 Flat 227 Helen Gladstone House Nelson Square  
 Flat 186 Applegarth House Nelson Square  
 Flat 206 Applegarth House Nelson Square  
 Flat 226 Helen Gladstone House Nelson Square  
 Flat 228 Helen Gladstone House Nelson Square  
 Flat 225 Helen Gladstone House Nelson Square  
 Flat 222 Helen Gladstone House Nelson Square  
 Flat 223 Helen Gladstone House Nelson Square  
 Flat 224 Helen Gladstone House Nelson Square  
 Flat 233 Helen Gladstone House Nelson Square  
 Flat 234 Helen Gladstone House Nelson Square  
 Flat 235 Helen Gladstone House Nelson Square  
 Flat 232 Helen Gladstone House Nelson Square  
 Flat 229 Helen Gladstone House Nelson Square  
 Flat 230 Helen Gladstone House Nelson Square  
 Flat 231 Helen Gladstone House Nelson Square  
 Flat 221 Helen Gladstone House Nelson Square  
 Flat 211 Helen Gladstone House Nelson Square  
 Flat 212 Helen Gladstone House Nelson Square  
 Flat 213 Helen Gladstone House Nelson Square  
 Flat 210 Helen Gladstone House Nelson Square  
 Flat 207 Applegarth House Nelson Square  
 Flat 208 Applegarth House Nelson Square  
 Flat 209 Applegarth House Nelson Square  
 Flat 218 Helen Gladstone House Nelson Square  
 Flat 219 Helen Gladstone House Nelson Square  
 Flat 220 Helen Gladstone House Nelson Square  
 Flat 32 Vaughan House Nelson Square  
 Flat 4 Vaughan House Nelson Square  
 Flat 40 Vaughan House Nelson Square  
 Flat 41 Vaughan House Nelson Square  
 Flat 23 Vaughan House Nelson Square  
 Flat 24 Vaughan House Nelson Square  
 Flat 25 Vaughan House Nelson Square  
 Flat 22 Vaughan House Nelson Square  
 Flat 2 Vaughan House Nelson Square  
 Flat 20 Vaughan House Nelson Square  
 Flat 21 Vaughan House Nelson Square  
 Block D Flat 1 Peabody Square Blackfriars Road  
 Block M Flat 1 Peabody Square Blackfriars Road

Block N Flat 1 Peabody Square Blackfriars Road  
 Block K Flat 1 Peabody Square Blackfriars Road  
 Block R Flat 1 Peabody Square Blackfriars Road  
 Block U Flat 4 Peabody Square Blackfriars Road  
 Block P Flat 1 Peabody Square Blackfriars Road  
 Block Q Flat 1 Peabody Square Blackfriars Road  
 Flat 14 Bridgehouse Court Blackfriars Road  
 Block T Flat 8 Peabody Square Blackfriars Road  
 Block T Flat 9 Peabody Square Blackfriars Road  
 Block T Flat 10 Peabody Square Blackfriars Road  
 7 Lagare Apartments 53 Surrey Row London  
 2 Webber Row London SE1 8QP  
 85 Blackfriars Road London SE1 8HA  
 6 Lagare Apartments 53 Surrey Row London  
 8 Lagare Apartments 53 Surrey Row London  
 5 Lagare Apartments 53 Surrey Row London  
 2 Lagare Apartments 53 Surrey Row London  
 3 Lagare Apartments 53 Surrey Row London  
 4 Lagare Apartments 53 Surrey Row London  
 169 Blackfriars Road London SE1 8ER  
 Barons Place 195-203 Waterloo Road London  
 Newspaper House 65 Webber Street London  
 33 Rushworth Street London SE1 0RB  
 176 Blackfriars Road London SE1 8ER  
 Flat 3 Tadworth House Lancaster Estate Webber Street  
 Flat 4 Tadworth House Lancaster Estate Webber Street  
 Flat 5 Tadworth House Lancaster Estate Webber Street  
 Flat 27 Tadworth House Lancaster Estate Webber Street  
 Flat 24 Tadworth House Lancaster Estate Webber Street  
 Flat 25 Tadworth House Lancaster Estate Webber Street  
 Flat 26 Tadworth House Lancaster Estate Webber Street  
 Flat 1 Brookwood House Lancaster Estate Webber Street  
 Flat 10 Brookwood House Lancaster Estate Webber Street  
 Flat 11 Brookwood House Lancaster Estate Webber Street  
 Flat 9 Tadworth House Lancaster Estate Webber Street  
 Flat 6 Tadworth House Lancaster Estate Webber Street  
 Flat 7 Tadworth House Lancaster Estate Webber Street  
 Flat 8 Tadworth House Lancaster Estate Webber Street  
 Flat 23 Tadworth House Lancaster Estate Webber Street  
 Flat 14 Tadworth House Lancaster Estate Webber Street  
 171A Blackfriars Road London SE1 8ER  
 Unit 3 160 Blackfriars Road London  
 Unit 1 160 Blackfriars Road London  
 Unit 2 160 Blackfriars Road London  
 Flat 3 Globe View House 171 Blackfriars Road  
 Flat 4 Globe View House 171 Blackfriars Road  
 Flat 5 Globe View House 171 Blackfriars Road  
 Flat 2 Globe View House 171 Blackfriars Road  
 173A Blackfriars Road London SE1 8ER  
 173B Blackfriars Road London SE1 8ER  
 Flat 1 Globe View House 171 Blackfriars Road  
 Apartment 9 10 Rushworth Street London  
 12 Rushworth Street London SE1 0RB  
 Apartment 1 10 Rushworth Street London  
 Flat 3 Vaughan House Nelson Square  
 Flat 30 Vaughan House Nelson Square  
 Flat 31 Vaughan House Nelson Square  
 Flat 29 Vaughan House Nelson Square  
 Flat 26 Vaughan House Nelson Square  
 Flat 27 Vaughan House Nelson Square  
 Flat 28 Vaughan House Nelson Square  
 Flat 46 Vaughan House Nelson Square  
 Flat 166 Applegarth House Nelson Square  
 Flat 167 Applegarth House Nelson Square  
 Flat 168 Applegarth House Nelson Square  
 Flat 165 Applegarth House Nelson Square  
 Flat 162 Applegarth House Nelson Square  
 Flat 163 Applegarth House Nelson Square  
 Flat 164 Applegarth House Nelson Square  
 Flat 173 Applegarth House Nelson Square  
 Flat 174 Applegarth House Nelson Square  
 Flat 175 Applegarth House Nelson Square  
 Unit 203 2-6 Boundary Row London  
 Flat 8 Vaughan House Nelson Square  
 Flat 9 Vaughan House Nelson Square  
 Unit 202 2-6 Boundary Row London  
 Unit 204 2-6 Boundary Row London  
 Unit 201 2-6 Boundary Row London  
 8A Lagare Apartments 51 Surrey Row London  
 Part Ground And Part First Floor 1 Rushworth Street London

Excluding Part Ground And Part First Floor 1  
 Rushworth Street London  
 Unit 209 2-6 Boundary Row London  
 Unit 210 2-6 Boundary Row London  
 Unit 211 2-6 Boundary Row London  
 Unit 208 2-6 Boundary Row London  
 Unit 205 2-6 Boundary Row London  
 Unit 206 2-6 Boundary Row London  
 Unit 207 2-6 Boundary Row London  
 Ground Floor 2-6 Boundary Row London  
 Unit 105 2-6 Boundary Row London  
 Unit 106 2-6 Boundary Row London  
 Unit 107 2-6 Boundary Row London  
 Unit 104 2-6 Boundary Row London  
 Unit 101 2-6 Boundary Row London  
 Unit 102 2-6 Boundary Row London  
 Unit 103 2-6 Boundary Row London  
 Unit 112 2-6 Boundary Row London  
 Unit 114 2-6 Boundary Row London  
 Unit 115 2-6 Boundary Row London  
 Unit 111 2-6 Boundary Row London  
 Unit 108 2-6 Boundary Row London  
 Unit 109 2-6 Boundary Row London  
 Unit 302 2-6 Boundary Row London  
 Unit 303 2-6 Boundary Row London  
 Unit 304 2-6 Boundary Row London  
 Unit 305 2-6 Boundary Row London  
 Unit 214 2-6 Boundary Row London  
 Unit 215 2-6 Boundary Row London  
 Unit 301 2-6 Boundary Row London  
 Unit 310 2-6 Boundary Row London  
 Unit 311 2-6 Boundary Row London  
 Unit 312 2-6 Boundary Row London  
 Unit 309 2-6 Boundary Row London  
 Unit 306 2-6 Boundary Row London  
 Unit 307 2-6 Boundary Row London  
 Flat 4 Ripley House Rushworth Street  
 Flat 7 Ripley House Rushworth Street  
 Flat 5 Ripley House Rushworth Street  
 Flat 6 Ripley House Rushworth Street  
 Flat 8 Merrow House Rushworth Street  
 Flat 1 Merrow House Rushworth Street  
 Flat 10 Merrow House Rushworth Street  
 Flat 11 Merrow House Rushworth Street  
 5 Kings Bench Street London SE1 0QX  
 Flat 267 Helen Gladstone House Nelson  
 Square  
 Flat 268 Helen Gladstone House Nelson  
 Square  
 Flat 269 Helen Gladstone House Nelson  
 Square  
 Flat 5 Merrow House Rushworth Street  
 Flat 6 Merrow House Rushworth Street  
 Flat 7 Merrow House Rushworth Street  
 Flat 4 Merrow House Rushworth Street  
 Flat 12 Merrow House Rushworth Street  
 Flat 2 Merrow House Rushworth Street  
 Flat 21 Albury Buildings Boyfield Street  
 Flat 22 Albury Buildings Boyfield Street  
 Flat 2 Albury Buildings Boyfield Street  
 Flat 20 Albury Buildings Boyfield Street  
 Flat 7 Clandon Buildings Boyfield Street  
 Flat 1A Pakeman House Pocock Street  
 Flat 1 Bazeley House Library Street  
 Flat 2 Bazeley House Library Street  
 Unit 12 33 Rushworth Street London  
 8 The Priory Webber Street London  
 9 The Priory Webber Street London  
 Unit 9 33 Rushworth Street London  
 Flat 7 Bazeley House Library Street  
 Flat 8 Bazeley House Library Street  
 Flat 9 Bazeley House Library Street  
 Flat 6 Bazeley House Library Street  
 Flat 3 Bazeley House Library Street  
 Flat 10 Lingfield House Lancaster Estate  
 Lancaster Street  
 Flat 11 Lingfield House Lancaster Estate  
 Lancaster Street  
 Flat 9 Markstone House Lancaster Street  
 Flat 1 Lingfield House Lancaster Estate  
 Lancaster Street  
 Flat 30 Markstone House Lancaster Street  
 Flat 21 Markstone House Lancaster Street  
 Flat 22 Markstone House Lancaster Street  
 Flat 23 Markstone House Lancaster Street  
 Flat 20 Markstone House Lancaster Street  
 Flat 18 Markstone House Lancaster Street  
 Flat 19 Markstone House Lancaster Street  
 Flat 2 Markstone House Lancaster Street  
 Flat 28 Markstone House Lancaster Street  
 Flat 29 Markstone House Lancaster Street  
 Flat 3 Markstone House Lancaster Street  
 Flat 27 Lingfield House Lancaster Estate  
 Lancaster Street  
 Flat 26 Lingfield House Lancaster Estate  
 Lancaster Street  
 Flat 28 Lingfield House Lancaster Estate  
 Lancaster Street  
 Flat 25 Lingfield House Lancaster Estate  
 Lancaster Street  
 Flat 22 Lingfield House Lancaster Estate  
 Lancaster Street  
 Flat 23 Lingfield House Lancaster Estate  
 Lancaster Street  
 Unit 308 2-6 Boundary Row London  
 Cafe 2-6 Boundary Row London  
 Flat 20 Zeiss Court 46 Lancaster Street  
 Flat 21 Zeiss Court 46 Lancaster Street  
 Flat 22 Zeiss Court 46 Lancaster Street  
 Flat 19 Zeiss Court 46 Lancaster Street  
 Flat 16 Zeiss Court 46 Lancaster Street  
 Flat 17 Zeiss Court 46 Lancaster Street  
 Flat 18 Zeiss Court 46 Lancaster Street  
 2 Eliza House 38 Glasshill Street London



3 Eliza House 38 Glasshill Street London  
 4 Eliza House 38 Glasshill Street London  
 1 Eliza House 38 Glasshill Street London  
 Flat 23 Zeiss Court 46 Lancaster Street  
 Flat 24 Zeiss Court 46 Lancaster Street  
 Flat 15 Zeiss Court 46 Lancaster Street  
 Flat 5 Zeiss Court 46 Lancaster Street  
 Flat 9 Newspaper House 40 Rushworth Street  
 5 Eliza House 38 Glasshill Street London  
 Seventh Floor 160 Blackfriars Road London  
 Madano 160 Blackfriars Road London  
 Unit A Newspaper House 40 Rushworth Street  
 Unit B Newspaper House 40 Rushworth Street  
 Fourth Floor 1 Valentine Place London  
 Fifth Floor 1 Valentine Place London  
 Sixth Floor 1 Valentine Place London  
 Lower Ground And Ground Floors 1 Valentine Place London  
 East Studio 2 Pontypool Place London  
 First Floor 1 Valentine Place London  
 Second And Third Floors 1 Valentine Place London  
 Flat 8 Newspaper House 40 Rushworth Street  
 28A Glasshill Street London SE1 0QR  
 40 Kings Bench Street London SE1 0QX  
 28 Glasshill Street London SE1 0QR  
 6 Eliza House 38 Glasshill Street London  
 7 Eliza House 38 Glasshill Street London  
 8 Eliza House 38 Glasshill Street London  
 Flat 5 Newspaper House 40 Rushworth Street  
 Flat 6 Newspaper House 40 Rushworth Street  
 Flat 7 Newspaper House 40 Rushworth Street  
 Flat 4 Newspaper House 40 Rushworth Street  
 Flat 1 Newspaper House 40 Rushworth Street  
 Flat 2 Newspaper House 40 Rushworth Street  
 Flat 3 Newspaper House 40 Rushworth Street  
 33 Buckstone Apartments 140 Blackfriars Road London  
 34 Buckstone Apartments 140 Blackfriars Road London  
 35 Buckstone Apartments 140 Blackfriars Road London  
 32 Buckstone Apartments 140 Blackfriars Road London  
 29 Buckstone Apartments 140 Blackfriars Road London  
 19 Elliston Apartments 9 Glade Path London  
 6 Buckstone Apartments 140 Blackfriars Road London  
 7 Buckstone Apartments 140 Blackfriars Road London  
 8 Buckstone Apartments 140 Blackfriars Road London  
 9 Elliston Apartments 9 Glade Path London  
 10 Elliston Apartments 9 Glade Path London  
 11 Elliston Apartments 9 Glade Path London  
 8 Elliston Apartments 9 Glade Path London  
 5 Elliston Apartments 9 Glade Path London  
 Flat 24 Lingfield House Lancaster Estate Lancaster Street  
 21 Webber Street London SE1 8QW  
 231 Waterloo Road London SE1 8XH  
 Suite 213 154-156 Blackfriars Road London  
 Suite 301 154-156 Blackfriars Road London  
 Block D Estate Office Peabody Square Blackfriars Road  
 Suite 306 154-156 Blackfriars Road London  
 2-6 Boundary Row London SE1 8HP  
 Suite G02 154-156 Blackfriars Road London  
 Suite 109 154-156 Blackfriars Road London  
 Suite 107 154-156 Blackfriars Road London  
 Suite 201 154-156 Blackfriars Road London  
 Suite G07 154-156 Blackfriars Road London  
 St Alphege Clergy House Pocock Street London  
 The Convent 48 Rushworth Street London  
 Suite 200A 154-156 Blackfriars Road London  
 Health Centre 151-153 Blackfriars Road London  
 Suite 206 154-156 Blackfriars Road London  
 Suite 105 154-156 Blackfriars Road London  
 Suite 104 154-156 Blackfriars Road London  
 Suite 208 154-156 Blackfriars Road London  
 Suite 101 154-156 Blackfriars Road London  
 19 Valentine Place London SE1 8QH  
 Suite 108 154-156 Blackfriars Road London  
 Suite G03 And G04 154-156 Blackfriars Road London  
 Suite 200B 154-156 Blackfriars Road London  
 Block R Flat 7 Peabody Square Blackfriars Road  
 Block R Flat 8 Peabody Square Blackfriars Road  
 Block R Flat 9 Peabody Square Blackfriars Road  
 Block R Flat 6 Peabody Square Blackfriars Road  
 Block K Flat 9 Peabody Square Blackfriars Road  
 Block M Flat 7 Peabody Square Blackfriars Road

Block K Flat 7 Peabody Square Blackfriars Road  
 Block K Flat 8 Peabody Square Blackfriars Road  
 Block K Flat 6 Peabody Square Blackfriars Road  
 Block K Flat 3 Peabody Square Blackfriars Road  
 Block K Flat 4 Peabody Square Blackfriars Road  
 Block K Flat 5 Peabody Square Blackfriars Road  
 Suite 207 154-156 Blackfriars Road London  
 154-156 Blackfriars Road London SE1 8EN  
 Suite G05 154-156 Blackfriars Road London  
 Suite 103 154-156 Blackfriars Road London  
 Block K Flat 10 Peabody Square Blackfriars Road  
 Block K Flat 11 Peabody Square Blackfriars Road  
 Suite 102 154-156 Blackfriars Road London  
 Block K Flat 2 Peabody Square Blackfriars Road  
 2 Delarch House Webber Row Estate Webber Row London  
 2 St Georges Cottages Glasshill Street London  
 1 St Georges Cottages Glasshill Street London  
 Flat 1B Pakeman House Pocock Street  
 5 Delarch House Webber Row Estate Webber Row London  
 5 St Georges Cottages Glasshill Street London  
 6 Delarch House Webber Row Estate Webber Row London  
 4 St Georges Cottages Glasshill Street London  
 3C St Georges Cottages Glasshill Street London  
 3D St Georges Cottages Glasshill Street London  
 4 Delarch House Webber Row Estate Webber Row London  
 6 Elliston Apartments 9 Glade Path London  
 7 Elliston Apartments 9 Glade Path London  
 16 Elliston Apartments 9 Glade Path London  
 17 Elliston Apartments 9 Glade Path London  
 18 Elliston Apartments 9 Glade Path London  
 15 Elliston Apartments 9 Glade Path London  
 12 Elliston Apartments 9 Glade Path London  
 13 Elliston Apartments 9 Glade Path London  
 Flat 2 1 Valentine Row London  
 Flat 11 1 Valentine Row London  
 Flat 12 1 Valentine Row London  
 Flat 13 1 Valentine Row London  
 Flat 10 1 Valentine Row London

Flat 7 1 Valentine Row London  
 Flat 8 1 Valentine Row London  
 Flat 9 1 Valentine Row London  
 Flat 4 5 Valentine Place London  
 Flat 52 Globe View House 27 Pocock Street  
 Flat 53 Globe View House 27 Pocock Street  
 Flat 54 Globe View House 27 Pocock Street  
 Flat 51 Globe View House 27 Pocock Street  
 Flat 48 Globe View House 27 Pocock Street  
 Flat 49 Globe View House 27 Pocock Street  
 Flat 50 Globe View House 27 Pocock Street  
 Flat 59 Globe View House 27 Pocock Street  
 Flat 60 Globe View House 27 Pocock Street  
 Flat 61 Globe View House 27 Pocock Street  
 Flat 58 Globe View House 27 Pocock Street  
 Flat 55 Globe View House 27 Pocock Street  
 Flat 56 Globe View House 27 Pocock Street  
 Flat 57 Globe View House 27 Pocock Street  
 Flat 47 Globe View House 27 Pocock Street  
 Flat 37 Globe View House 27 Pocock Street  
 Flat 38 Globe View House 27 Pocock Street  
 Flat 39 Globe View House 27 Pocock Street  
 Globe View House 171 Blackfriars Road Southwark  
 C/O Freeths XXXX  
 24 Sharpley Court 8A Pocock Street London  
 C/O Email XXXX  
 10-16 Ashwin Street Dalston London  
 11TH Floor 1 Angel Court London  
 4 Underwood Row London N1 7LP  
 140 Southwark Bridge Road London SE1 0DG  
 Flat 36 Globe View House 171 Blackfriars Road  
 C/O Members Room 160 Tooley Street London  
 Flat 79 Globe View House 29 Pocock Street  
 Flat 78 Globe View House 29 Pocock Street  
 Flat 80 Globe View House 29 Pocock Street  
 Flat 1 5 Valentine Place London  
 Flat 2 5 Valentine Place London  
 Flat 3 5 Valentine Place London  
 Flat 85 Globe View House 29 Pocock Street  
 Flat 86 Globe View House 29 Pocock Street  
 Flat 77 Globe View House 29 Pocock Street  
 Flat 67 Globe View House 27 Pocock Street  
 Flat 68 Globe View House 27 Pocock Street  
 Flat 69 Globe View House 27 Pocock Street  
 Flat 66 Globe View House 27 Pocock Street  
 Flat 63 Globe View House 27 Pocock Street  
 1 Delarch House Webber Row Estate Webber Row London  
 Flat 7 84 Blackfriars Road London  
 Flat 8 84 Blackfriars Road London  
 Flat A Alphege House 2 Pocock Street  
 Flat 6 84 Blackfriars Road London  
 Flat 3 84 Blackfriars Road London

Flat 4 84 Blackfriars Road London  
 Flat 5 84 Blackfriars Road London  
 Studio 2 63 Webber Street London  
 Third Floor Flat 176 Blackfriars Road  
 London  
 Third Floor Flat 81 Blackfriars Road London  
 Second Floor Flat 81 Blackfriars Road  
 London  
 Flat B Alphege House 2 Pocock Street  
 Basement Flat 81 Blackfriars Road London  
 Ground Floor Flat 81 Blackfriars Road  
 London  
 7 Delarch House Webber Row Estate  
 Webber Row London  
 156 Blackfriars Road London SE1 8EN  
 Flat 22 Patrick Court 92 Webber Street  
 Flat 23 Patrick Court 92 Webber Street  
 Flat 32 Patrick Court 92 Webber Street  
 Flat 33 Patrick Court 92 Webber Street  
 Flat 34 Patrick Court 92 Webber Street  
 Flat 31 Patrick Court 92 Webber Street  
 Flat 28 Patrick Court 92 Webber Street  
 Flat 29 Patrick Court 92 Webber Street  
 Flat 30 Patrick Court 92 Webber Street  
 Flat 32 Pakeman House Pocock Street  
 Flat 33 Pakeman House Pocock Street  
 Flat 34 Pakeman House Pocock Street  
 Flat 31 Pakeman House Pocock Street  
 Flat 29 Pakeman House Pocock Street  
 Flat 3 Pakeman House Pocock Street  
 Flat 30 Pakeman House Pocock Street  
 Flat 39 Pakeman House Pocock Street  
 17 Delarch House Webber Row Estate  
 Webber Row London  
 18 Delarch House Webber Row Estate  
 Webber Row London  
 15 Delarch House Webber Row Estate  
 Webber Row London  
 16 Delarch House Webber Row Estate  
 Webber Row London  
 Flat 38 Quentin House Chaplin Close  
 Flat 39 Quentin House Chaplin Close  
 Flat 40 Quentin House Chaplin Close  
 Flat 37 Quentin House Chaplin Close  
 Flat 7 Quentin House Gray Street  
 Flat 8 Quentin House Gray Street  
 Flat 9 Quentin House Gray Street  
 Flat 45 Quentin House Chaplin Close  
 Flat 46 Quentin House Chaplin Close  
 Flat 47 Quentin House Chaplin Close  
 Flat 44 Quentin House Chaplin Close  
 Flat 41 Quentin House Chaplin Close  
 Flat 42 Quentin House Chaplin Close  
 Flat 43 Quentin House Chaplin Close  
 Flat 6 Quentin House Gray Street  
 Flat 3 Quentin House Gray Street  
 Flat 30 Quentin House Gray Street

Flat 31 Quentin House Gray Street  
 Flat 29 Quentin House Gray Street  
 Flat 26 Quentin House Gray Street  
 Flat 27 Quentin House Gray Street  
 Flat 64 Globe View House 27 Pocock Street  
 Flat 65 Globe View House 27 Pocock Street  
 Flat 74 Globe View House 29 Pocock Street  
 Flat 75 Globe View House 29 Pocock Street  
 Flat 76 Globe View House 29 Pocock Street  
 Flat 73 Globe View House 29 Pocock Street  
 Flat 70 Globe View House 29 Pocock Street  
 Flat 71 Globe View House 29 Pocock Street  
 Flat 72 Globe View House 29 Pocock Street  
 4 Bench Apartments 22 Kings Bench Street  
 London  
 5 Bench Apartments 22 Kings Bench Street  
 London  
 6 Bench Apartments 22 Kings Bench Street  
 London  
 3 Bench Apartments 22 Kings Bench Street  
 London  
 Ro 43 Webber Street London  
 Flat 9 Polychrome Court 261 Waterloo Road  
 Flat 10 Polychrome Court 261 Waterloo  
 Road  
 Flat 2A Vaughan House Nelson Square  
 Flat 3 6 Barons Place London  
 Flat 1 6 Barons Place London  
 Flat 2 6 Barons Place London  
 Flat 1 86 Blackfriars Road London  
 Flat 2 86 Blackfriars Road London  
 Flat 3 86 Blackfriars Road London  
 Flat 5 6 Burrows Mews London  
 Flat 2 6 Burrows Mews London  
 Flat 3 6 Burrows Mews London  
 Flat 4 6 Burrows Mews London  
 13 Bench Apartments 22 Kings Bench Street  
 London  
 14 Bench Apartments 22 Kings Bench Street  
 London  
 5 Burrows Mews London SE1 8LD  
 Flat 4 86 Blackfriars Road London  
 Flat 5 86 Blackfriars Road London  
 Unit 4 109-115 Blackfriars Road London  
 Flat 1 6 Burrows Mews London  
 Flat 2 44 Nelson Square London  
 Flat 3 44 Nelson Square London  
 Flat 1 45 Nelson Square London  
 Flat 1 44 Nelson Square London  
 Ground Floor First Floor And Second Floor  
 1-2 Silex Street London  
 Tenants Hall Overy House Webber Row  
 Estate Webber Row  
 Flat 6 45 Nelson Square London  
 Flat 5 45 Nelson Square London  
 Flat 2 45 Nelson Square London  
 Flat 3 45 Nelson Square London

Flat 4 45 Nelson Square London  
 Unit 20 33 Rushworth Street London  
 Unit 24 33 Rushworth Street London  
 Flat 14 59 Webber Street London  
 Unit 10 33 Rushworth Street London  
 Unit 13 33 Rushworth Street London  
 Unit 19 33 Rushworth Street London  
 Flat 4 94 Webber Street London  
 Friars Court Rushworth Street London  
 Flat 3 94 Webber Street London  
 David Barker House 115A Blackfriars Road London  
 Flat 1 94 Webber Street London  
 Flat 2 94 Webber Street London  
 Flat 1 Polychrome Court 241 Waterloo Road  
 Flat 2 Polychrome Court 241 Waterloo Road  
 Flat 3 Polychrome Court 241 Waterloo Road  
 Flat 4 6 Barons Place London  
 Flat 28 Quentin House Gray Street  
 Flat 36 Quentin House Gray Street  
 Flat 4 Quentin House Gray Street  
 Flat 9 Pakeman House Pocock Street  
 Flat 17 Vaughan House Nelson Square  
 Flat 18 Vaughan House Nelson Square  
 Flat 19 Vaughan House Nelson Square  
 Flat 16 Vaughan House Nelson Square  
 Flat 13 Vaughan House Nelson Square  
 Flat 14 Vaughan House Nelson Square  
 Flat 15 Vaughan House Nelson Square  
 Flat 6 Pakeman House Pocock Street  
 Flat 46 Pakeman House Pocock Street  
 Flat 47 Pakeman House Pocock Street  
 Flat 48 Pakeman House Pocock Street  
 Flat 45 Pakeman House Pocock Street  
 Flat 42 Pakeman House Pocock Street  
 Flat 43 Pakeman House Pocock Street  
 Flat 44 Pakeman House Pocock Street  
 Flat 52 Pakeman House Pocock Street  
 Flat 1 Mawdley House Webber Row Estate Webber Row  
 Flat 9 Mawdley House Webber Row Estate Webber Row  
 Flat 18 Mawdley House Webber Row Estate Webber Row  
 Flat 53 Quentin House Chaplin Close  
 Flat 10 Mawdley House Webber Row Estate Webber Row  
 Flat 52 Quentin House Chaplin Close  
 Flat 49 Quentin House Chaplin Close  
 Flat 50 Quentin House Chaplin Close  
 Flat 51 Quentin House Chaplin Close  
 Flat 15 Mawdley House Webber Row Estate Webber Row  
 Flat 16 Mawdley House Webber Row Estate Webber Row  
 Flat 17 Mawdley House Webber Row Estate Webber Row  
 Flat 14 Mawdley House Webber Row Estate Webber Row  
 Flat 11 Mawdley House Webber Row Estate Webber Row  
 Flat 12 Mawdley House Webber Row Estate Webber Row  
 Flat 13 Mawdley House Webber Row Estate Webber Row  
 Flat 25 Quentin House Gray Street  
 Flat 11 Overy House Webber Row Estate Webber Row  
 Flat 12 Overy House Webber Row Estate Webber Row  
 Flat 13 Overy House Webber Row Estate Webber Row  
 Flat 10 Overy House Webber Row Estate Webber Row  
 Flat 9 Algar House Webber Row Estate Webber Row  
 Centre For Language In Primary Education Webber Street London  
 Flat 1 Overy House Webber Row Estate Webber Row  
 Flat 18 Overy House Webber Row Estate Webber Row  
 22 Dibdin Apartments 149 Blackfriars Road London  
 23 Dibdin Apartments 149 Blackfriars Road London  
 24 Dibdin Apartments 149 Blackfriars Road London  
 21 Dibdin Apartments 149 Blackfriars Road London  
 18 Dibdin Apartments 149 Blackfriars Road London  
 19 Dibdin Apartments 149 Blackfriars Road London  
 20 Dibdin Apartments 149 Blackfriars Road London  
 40 Dibdin Apartments 149 Blackfriars Road London  
 Flat 1 96 Webber Street London  
 Flat 2 96 Webber Street London  
 Flat 5 6 Barons Place London  
 Flat 6 6 Barons Place London  
 Flat 70 Patrick Court 92 Webber Street  
 Flat 71 Patrick Court 92 Webber Street  
 Flat 72 Patrick Court 92 Webber Street  
 Flat 69 Patrick Court 92 Webber Street  
 Flat 66 Patrick Court 92 Webber Street  
 Flat 67 Patrick Court 92 Webber Street  
 Flat 68 Patrick Court 92 Webber Street  
 Flat 6 6 Burrows Mews London  
 First Floor 20 Kings Bench Street London  
 Ground Floor 20 Kings Bench Street London  
 Apartment 1 46 Webber Street London  
 Flat 60 Patrick Court 92 Webber Street

First Floor 46 Webber Street London  
 Second Floor 46 Webber Street London  
 Ground Floor 46 Webber Street London  
 Lower Ground 46 Webber Street London  
 Apartment 6 46 Webber Street London  
 Apartment 7 46 Webber Street London  
 Apartment 8 46 Webber Street London  
 Apartment 5 46 Webber Street London  
 Apartment 2 46 Webber Street London  
 Apartment 3 46 Webber Street London  
 Apartment 4 46 Webber Street London  
 Ground Floor And First Floor 12-12A  
 Valentine Place London  
 Living Accommodation 108 Blackfriars Road  
 London  
 Fourth Floor 207 Waterloo Road London  
 Third Floor 4 Valentine Place London  
 Workshop Stopher House 90 Webber Street  
 Block S Ground Floor Office Peabody  
 Square Blackfriars Road  
 159A Applegarth House Nelson Square  
 London  
 Third Floor 207 Waterloo Road London  
 92 Blackfriars Road London SE1 8HW  
 21 Valentine Place London SE1 8QH  
 Flat 50 Patrick Court 92 Webber Street  
 Flat 10 Patrick Court 92 Webber Street  
 Flat 11 Patrick Court 92 Webber Street  
 Flat 12 Patrick Court 92 Webber Street  
 Flat 9 Patrick Court 92 Webber Street  
 Flat 3 Patrick Court 92 Webber Street  
 16 Bench Apartments 22 Kings Bench Street  
 London  
 Fourth Floor 82-83 Blackfriars Road London  
 Flat 2 Patrick Court 92 Webber Street  
 Flat 4 Patrick Court 92 Webber Street  
 Flat 1 Patrick Court 92 Webber Street  
 Ground Floor 82-83 Blackfriars Road  
 London  
 30 Rushworth Street London SE1 0RB  
 Flat 20 Patrick Court 92 Webber Street  
 Flat 40 Patrick Court 92 Webber Street  
 Flat 41 Patrick Court 92 Webber Street  
 Flat 42 Patrick Court 92 Webber Street  
 Flat 39 Patrick Court 92 Webber Street  
 Flat 36 Patrick Court 92 Webber Street  
 Flat 37 Patrick Court 92 Webber Street  
 Flat 38 Patrick Court 92 Webber Street  
 Flat 47 Patrick Court 92 Webber Street  
 Flat 48 Patrick Court 92 Webber Street  
 Flat 49 Patrick Court 92 Webber Street  
 46 Rushworth Street London SE1 0RB  
 115 Blackfriars Road London SE1 8HW  
 56 Dibdin Apartments 149 Blackfriars Road  
 London  
 113 Blackfriars Road London SE1 8HW  
 114 Blackfriars Road London SE1 8HW  
 Flat 11 Pakeman House Pocock Street  
 Flat 12 Pakeman House Pocock Street  
 Flat 13 Pakeman House Pocock Street  
 Flat 10 Pakeman House Pocock Street  
 Flat 25 Algar House Webber Row Estate  
 Webber Row  
 Flat 7 Algar House Webber Row Estate  
 Webber Row  
 Flat 4 Algar House Webber Row Estate  
 Webber Row  
 Flat 24 Algar House Webber Row Estate  
 Webber Row  
 Flat 3 Algar House Webber Row Estate  
 Webber Row  
 Flat 20 Overy House Webber Row Estate  
 Webber Row  
 Flat 16 Quentin House Gray Street  
 Flat 17 Quentin House Gray Street  
 Flat 18 Quentin House Gray Street  
 Flat 15 Quentin House Gray Street  
 Flat 12 Quentin House Gray Street  
 Flat 13 Quentin House Gray Street  
 Flat 14 Quentin House Gray Street  
 Flat 22 Quentin House Gray Street  
 Flat 23 Quentin House Gray Street  
 Flat 24 Quentin House Gray Street  
 Flat 21 Quentin House Gray Street  
 Flat 19 Quentin House Gray Street  
 Flat 2 Quentin House Gray Street  
 Flat 20 Quentin House Gray Street  
 Flat 11 Quentin House Gray Street  
 Flat 25 Overy House Webber Row Estate  
 Webber Row  
 Flat 3 Overy House Webber Row Estate  
 Webber Row  
 Flat 4 Overy House Webber Row Estate  
 Webber Row  
 Flat 24 Overy House Webber Row Estate  
 Webber Row  
 Flat 21 Overy House Webber Row Estate  
 Webber Row  
 Flat 22 Overy House Webber Row Estate  
 Webber Row  
 Flat 199 Applegarth House Nelson Square  
 Flat 200 Applegarth House Nelson Square  
 Flat 201 Applegarth House Nelson Square  
 Flat 191 Applegarth House Nelson Square  
 Flat 181 Applegarth House Nelson Square  
 Flat 182 Applegarth House Nelson Square  
 Flat 183 Applegarth House Nelson Square  
 Flat 180 Applegarth House Nelson Square  
 Flat 177 Applegarth House Nelson Square  
 Flat 178 Applegarth House Nelson Square  
 Flat 179 Applegarth House Nelson Square  
 Flat 188 Applegarth House Nelson Square  
 Flat 189 Applegarth House Nelson Square  
 Flat 190 Applegarth House Nelson Square

Flat 187 Applegarth House Nelson Square  
 Flat 184 Applegarth House Nelson Square  
 Flat 185 Applegarth House Nelson Square  
 Block C Flat 6 Peabody Square Blackfriars Road  
 Block C Flat 5 Peabody Square Blackfriars Road  
 Block C Flat 3 Peabody Square Blackfriars Road  
 Block B Flat 9 Peabody Square Blackfriars Road  
 Flat 46 Patrick Court 92 Webber Street  
 Flat 43 Patrick Court 92 Webber Street  
 Flat 44 Patrick Court 92 Webber Street  
 Flat 45 Patrick Court 92 Webber Street  
 Flat 35 Patrick Court 92 Webber Street  
 Flat 25 Patrick Court 92 Webber Street  
 Flat 26 Patrick Court 92 Webber Street  
 Flat 27 Patrick Court 92 Webber Street  
 Flat 24 Patrick Court 92 Webber Street  
 Flat 21 Patrick Court 92 Webber Street  
 34 Globe View House 27 Pocock Street London  
 14 Elliston Apartments 9 Glade Path London  
 11 Tadworth House Webber Street London  
 171 Blackfriars Rd London SE1 8ER  
 Tadworth House London SE1 0RH  
 Flat 37 Globe View House 27 Pocock Street London  
 Flat 25 Patrick Court, 92 Webber Street London SE1 0GB  
 27 Pocock Street 61 Globe View House London  
 46 Globe View House 27 Pocock Street London  
 13 Quentin House Gray Street London  
 Flat 24, Didbin Apartments 149 Blackfriars Road London  
 Pocock Street London SE1 0BJ  
 61 Globe View House London SE1 0FU  
 Flat 68, Globe View House, 27 Pocock Street, London  
 Globe View House London SE1 0FU  
 Apt 5, 10 Rushworth Street London SE1 0RB  
 Flat 12 Sharpley Court 8A Pocock Street London  
 Flat 32 Sharpley Court 8A Pocock Street London  
 13 Sharpley Court 8A Pocock St London  
 8A Pocock Street London SE1 0BJ  
 53 Globe View House 27 Pocock Street London  
 Flat 17 171 Blackfriars Road London  
 19 Brookhouse Avenue Leicester LE2 0JE  
 Flat 29, Globe View House, 171 Blackfriars Road, London  
 171 Blackfriars Road Flat 40 London  
 Globe View House London SE1 0BZ  
 Flat 10 Tadworth House Lancaster Estate Webber Street  
 Flat 15 Tadworth House Lancaster Estate Webber Street  
 Flat 16 Tadworth House Lancaster Estate Webber Street  
 Flat 13 Tadworth House Lancaster Estate Webber Street  
 Flat 11 Tadworth House Lancaster Estate Webber Street  
 Flat 12 Tadworth House Lancaster Estate Webber Street  
 Flat 20 Tadworth House Lancaster Estate Webber Street  
 Flat 21 Tadworth House Lancaster Estate Webber Street  
 Flat 22 Tadworth House Lancaster Estate Webber Street  
 Flat 2 Tadworth House Lancaster Estate Webber Street  
 Flat 17 Tadworth House Lancaster Estate Webber Street  
 Flat 256 Helen Gladstone House Nelson Square  
 Flat 20 Brookwood House Lancaster Estate Webber Street  
 Flat 21 Brookwood House Lancaster Estate Webber Street  
 Flat 1 Tadworth House Lancaster Estate Webber Street  
 Flat 257 Helen Gladstone House Nelson Square  
 Flat 258 Helen Gladstone House Nelson Square  
 Flat 255 Helen Gladstone House Nelson Square  
 Flat 252 Helen Gladstone House Nelson Square  
 Flat 253 Helen Gladstone House Nelson Square  
 Flat 254 Helen Gladstone House Nelson Square  
 Flat 13 Stopher House 90 Webber Street  
 Flat 10 Stopher House 90 Webber Street  
 Block B Flat 10 Peabody Square Blackfriars Road  
 Block C Flat 2 Peabody Square Blackfriars Road  
 Block A Flat 10 Peabody Square Blackfriars Road  
 Block S Flat 11 Peabody Square Blackfriars Road  
 Block S Flat 12 Peabody Square Blackfriars Road

Block A Flat 2 Peabody Square Blackfriars Road  
 Block S Flat 10 Peabody Square Blackfriars Road  
 Block S Flat 7 Peabody Square Blackfriars Road  
 Block S Flat 8 Peabody Square Blackfriars Road  
 Block S Flat 9 Peabody Square Blackfriars Road  
 Block A Flat 7 Peabody Square Blackfriars Road  
 Block A Flat 8 Peabody Square Blackfriars Road  
 Block A Flat 9 Peabody Square Blackfriars Road  
 Block A Flat 6 Peabody Square Blackfriars Road  
 Block A Flat 3 Peabody Square Blackfriars Road  
 Block A Flat 4 Peabody Square Blackfriars Road  
 Block A Flat 5 Peabody Square Blackfriars Road  
 Block C Flat 7 Peabody Square Blackfriars Road  
 Block O Flat 7 Peabody Square Blackfriars Road  
 Block O Flat 8 Peabody Square Blackfriars Road  
 Block O Flat 9 Peabody Square Blackfriars Road  
 Block O Flat 6 Peabody Square Blackfriars Road  
 Block O Flat 3 Peabody Square Blackfriars Road  
 Flat 217 Helen Gladstone House Nelson Square  
 Flat 214 Helen Gladstone House Nelson Square  
 Flat 215 Helen Gladstone House Nelson Square  
 Flat 216 Helen Gladstone House Nelson Square  
 Flat 176 Applegarth House Nelson Square  
 Flat 37 Vaughan House Nelson Square  
 Flat 38 Vaughan House Nelson Square  
 Flat 39 Vaughan House Nelson Square  
 Flat 36 Vaughan House Nelson Square  
 Flat 33 Vaughan House Nelson Square  
 Flat 34 Vaughan House Nelson Square  
 Flat 35 Vaughan House Nelson Square  
 Flat 43 Vaughan House Nelson Square  
 Flat 44 Vaughan House Nelson Square  
 Flat 45 Vaughan House Nelson Square  
 Flat 42 Vaughan House Nelson Square

Block D Flat 11 Peabody Square Blackfriars Road  
 Block C Flat 10 Peabody Square Blackfriars Road  
 Block D Flat 9 Peabody Square Blackfriars Road  
 Block D Flat 10 Peabody Square Blackfriars Road  
 Block D Flat 8 Peabody Square Blackfriars Road  
 Block D Flat 5 Peabody Square Blackfriars Road  
 Block D Flat 6 Peabody Square Blackfriars Road  
 Block D Flat 7 Peabody Square Blackfriars Road  
 Block S Flat 6 Peabody Square Blackfriars Road  
 Flat 4 Bridgehouse Court Blackfriars Road  
 Flat 5 Bridgehouse Court Blackfriars Road  
 Flat 6 Bridgehouse Court Blackfriars Road  
 Flat 3 Bridgehouse Court Blackfriars Road  
 39 Webber Street London SE1 8QW  
 Flat 1 Bridgehouse Court Blackfriars Road  
 Flat 2 Bridgehouse Court Blackfriars Road  
 Flat 263 Helen Gladstone House Nelson Square  
 Flat 264 Helen Gladstone House Nelson Square  
 Flat 265 Helen Gladstone House Nelson Square  
 Flat 9 Brookwood House Lancaster Estate Webber Street  
 Flat 18 Tadworth House Lancaster Estate Webber Street  
 Flat 19 Tadworth House Lancaster Estate Webber Street  
 Flat 12 Brookwood House Lancaster Estate Webber Street  
 Flat 1 Markstone House Lancaster Street  
 Flat 10 Markstone House Lancaster Street  
 Flat 8 Brookwood House Lancaster Estate Webber Street  
 Flat 5 Brookwood House Lancaster Estate Webber Street  
 Flat 6 Brookwood House Lancaster Estate Webber Street  
 Flat 7 Brookwood House Lancaster Estate Webber Street  
 Flat 15 Markstone House Lancaster Street  
 Flat 16 Markstone House Lancaster Street  
 Flat 17 Markstone House Lancaster Street  
 Flat 14 Markstone House Lancaster Street  
 Flat 11 Markstone House Lancaster Street  
 Flat 12 Markstone House Lancaster Street  
 Flat 13 Markstone House Lancaster Street

Flat 4 Brookwood House Lancaster Estate  
 Webber Street  
 Flat 17 Brookwood House Lancaster Estate  
 Webber Street  
 Flat 18 Brookwood House Lancaster Estate  
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 Flat 19 Brookwood House Lancaster Estate  
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 Flat 16 Brookwood House Lancaster Estate  
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 Flat 13 Brookwood House Lancaster Estate  
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 Flat 14 Brookwood House Lancaster Estate  
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 Flat 15 Brookwood House Lancaster Estate  
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 Flat 23 Brookwood House Lancaster Estate  
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 Flat 24 Brookwood House Lancaster Estate  
 Webber Street  
 Flat 3 Brookwood House Lancaster Estate  
 Webber Street  
 Flat 22 Brookwood House Lancaster Estate  
 Webber Street  
 Flat 2 Brookwood House Lancaster Estate  
 Webber Street  
 Flat 9 Globe View House 171 Blackfriars  
 Road  
 Flat 18 Globe View House 171 Blackfriars  
 Road  
 Flat 19 Globe View House 171 Blackfriars  
 Road  
 Flat 20 Globe View House 171 Blackfriars  
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 Flat 17 Globe View House 171 Blackfriars  
 Road  
 Flat 14 Globe View House 171 Blackfriars  
 Road  
 Flat 15 Globe View House 171 Blackfriars  
 Road  
 Flat 16 Globe View House 171 Blackfriars  
 Road  
 5 Bell House 57 Webber Street London  
 Flat 18 Sharpley Court 8A Pocock Street  
 Flat 19 Sharpley Court 8A Pocock Street  
 Flat 20 Sharpley Court 8A Pocock Street  
 Flat 261 Helen Gladstone House Nelson  
 Square  
 Flat 262 Helen Gladstone House Nelson  
 Square  
 Flat 259 Helen Gladstone House Nelson  
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 Flat 260 Helen Gladstone House Nelson  
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 Flat 251 Helen Gladstone House Nelson  
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 Flat 241 Helen Gladstone House Nelson  
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 Flat 242 Helen Gladstone House Nelson  
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 Flat 243 Helen Gladstone House Nelson  
 Square  
 Flat 7 Stopher House 90 Webber Street  
 Flat 8 Stopher House 90 Webber Street  
 Flat 9 Stopher House 90 Webber Street  
 Flat 19 Stopher House 90 Webber Street  
 Flat 20 Stopher House 90 Webber Street  
 Flat 21 Stopher House 90 Webber Street  
 Flat 18 Stopher House 90 Webber Street  
 Flat 14 Stopher House 90 Webber Street  
 Flat 15 Stopher House 90 Webber Street  
 Flat 17 Stopher House 90 Webber Street  
 Flat 37 Stopher House 90 Webber Street  
 Flat 57 Stopher House 90 Webber Street  
 Flat 58 Stopher House 90 Webber Street  
 Flat 59 Stopher House 90 Webber Street  
 Flat 56 Stopher House 90 Webber Street  
 Flat 31 Bazeley House Library Street  
 Flat 28 Bazeley House Library Street  
 Flat 25 Bazeley House Library Street  
 Flat 26 Bazeley House Library Street  
 Flat 27 Bazeley House Library Street  
 Unit 11 33 Rushworth Street London  
 Unit 7 33 Rushworth Street London  
 35-37 Rushworth Street London SE1 0RB  
 Unit 17 33 Rushworth Street London  
 Flat 32 Bazeley House Library Street  
 Flat 11 Bridgehouse Court Blackfriars Road  
 Flat 12 Bridgehouse Court Blackfriars Road  
 Flat 13 Bridgehouse Court Blackfriars Road  
 Flat 10 Bridgehouse Court Blackfriars Road  
 Flat 7 Bridgehouse Court Blackfriars Road  
 Flat 8 Bridgehouse Court Blackfriars Road  
 Flat 9 Bridgehouse Court Blackfriars Road  
 37 Webber Street London SE1 8QW  
 Block U Flat 1 Peabody Square Blackfriars  
 Road  
 Block U Flat 2 Peabody Square Blackfriars  
 Road  
 Block U Flat 3 Peabody Square Blackfriars  
 Road  
 Flat 172 Applegarth House Nelson Square  
 Flat 169 Applegarth House Nelson Square  
 Flat 170 Applegarth House Nelson Square  
 Flat 171 Applegarth House Nelson Square  
 Flat 161 Applegarth House Nelson Square  
 Flat 50 Vaughan House Nelson Square  
 Flat 51 Vaughan House Nelson Square  
 Flat 6 Vaughan House Nelson Square  
 Flat 5 Vaughan House Nelson Square  
 Flat 47 Vaughan House Nelson Square  
 Flat 48 Vaughan House Nelson Square  
 Flat 49 Vaughan House Nelson Square



Flat 158 Applegarth House Nelson Square  
 Flat 159 Applegarth House Nelson Square  
 Flat 160 Applegarth House Nelson Square  
 Flat 157 Applegarth House Nelson Square  
 Flat 7 Vaughan House Nelson Square  
 Block T Flat 5 Peabody Square Blackfriars Road  
 Block T Flat 6 Peabody Square Blackfriars Road  
 Block T Flat 3 Peabody Square Blackfriars Road  
 Block T Flat 4 Peabody Square Blackfriars Road  
 Block S Flat 3 Peabody Square Blackfriars Road  
 Block S Flat 4 Peabody Square Blackfriars Road  
 Block S Flat 5 Peabody Square Blackfriars Road  
 Block S Flat 2 Peabody Square Blackfriars Road  
 Block T Flat 11 Peabody Square Blackfriars Road  
 Block T Flat 12 Peabody Square Blackfriars Road  
 Block T Flat 14 Peabody Square Blackfriars Road  
 Block T Flat 2 Peabody Square Blackfriars Road  
 Flat 19 Bridgehouse Court Blackfriars Road  
 Flat 20 Bridgehouse Court Blackfriars Road  
 Flat 21 Bridgehouse Court Blackfriars Road  
 Flat 18 Bridgehouse Court Blackfriars Road  
 Flat 15 Bridgehouse Court Blackfriars Road  
 Flat 16 Bridgehouse Court Blackfriars Road  
 Flat 17 Bridgehouse Court Blackfriars Road  
 Flat 26 Bridgehouse Court Blackfriars Road  
 Flat 27 Bridgehouse Court Blackfriars Road  
 Flat 28 Bridgehouse Court Blackfriars Road  
 Flat 25 Bridgehouse Court Blackfriars Road  
 Flat 22 Bridgehouse Court Blackfriars Road  
 Flat 23 Bridgehouse Court Blackfriars Road  
 Flat 24 Bridgehouse Court Blackfriars Road  
 Flat 236 Helen Gladstone House Nelson Square  
 9 Rushworth Street London SE1 0RB  
 Flat 240 Helen Gladstone House Nelson Square  
 Flat 237 Helen Gladstone House Nelson Square  
 Flat 238 Helen Gladstone House Nelson Square  
 Flat 239 Helen Gladstone House Nelson Square  
 Flat 248 Helen Gladstone House Nelson Square  
 Flat 249 Helen Gladstone House Nelson Square  
 Flat 250 Helen Gladstone House Nelson Square  
 Flat 247 Helen Gladstone House Nelson Square  
 Flat 244 Helen Gladstone House Nelson Square  
 Flat 245 Helen Gladstone House Nelson Square  
 Flat 246 Helen Gladstone House Nelson Square  
 Flat 266 Helen Gladstone House Nelson Square  
 Flat 12 Ripley House Rushworth Street  
 Flat 2 Ripley House Rushworth Street  
 Flat 3 Ripley House Rushworth Street  
 Flat 11 Ripley House Rushworth Street  
 Flat 9 Merrow House Rushworth Street  
 Flat 1 Ripley House Rushworth Street  
 Flat 10 Ripley House Rushworth Street  
 Flat 8 Ripley House Rushworth Street  
 Flat 9 Ripley House Rushworth Street  
 Flat 1 Stopher House 90 Webber Street  
 24 Kings Bench Street London SE1 0QX  
 2 Bell House 57 Webber Street London  
 3 Bell House 57 Webber Street London  
 4 Bell House 57 Webber Street London  
 1 Bell House 57 Webber Street London  
 Lower Ground Floor Barons Place 195-203 Waterloo Road  
 Ground Floor Flat 86 Blackfriars Road London  
 First Floor 88-89 Blackfriars Road London  
 Flat 33 Sharpley Court 8A Pocock Street  
 Flat 34 Sharpley Court 8A Pocock Street  
 Flat 35 Sharpley Court 8A Pocock Street  
 Flat 32 Sharpley Court 8A Pocock Street  
 Flat 29 Sharpley Court 8A Pocock Street  
 Flat 30 Sharpley Court 8A Pocock Street  
 Flat 16 Sharpley Court 8A Pocock Street  
 Flat 17 Sharpley Court 8A Pocock Street  
 Flat 14 Sharpley Court 8A Pocock Street  
 Flat 15 Sharpley Court 8A Pocock Street  
 Flat 25 Sharpley Court 8A Pocock Street  
 Flat 26 Sharpley Court 8A Pocock Street  
 Flat 27 Sharpley Court 8A Pocock Street  
 Flat 24 Sharpley Court 8A Pocock Street  
 Flat 21 Sharpley Court 8A Pocock Street  
 Flat 22 Sharpley Court 8A Pocock Street  
 Flat 23 Sharpley Court 8A Pocock Street  
 Flat 13 Sharpley Court 8A Pocock Street  
 Flat 3 Sharpley Court 8A Pocock Street  
 Flat 4 Sharpley Court 8A Pocock Street  
 Flat 5 Sharpley Court 8A Pocock Street  
 Flat 2 Sharpley Court 8A Pocock Street  
 Apartment 9 46 Webber Street London

Flat 1 Sharpley Court 8A Pocock Street  
 Flat 10 Sharpley Court 8A Pocock Street  
 Flat 11 Sharpley Court 8A Pocock Street  
 Flat 12 Sharpley Court 8A Pocock Street  
 Milcote House Milcote Street London  
 1-3 Kings Bench Street London SE1 0QX  
 Unit 110 2-6 Boundary Row London  
 Unit 212 2-6 Boundary Row London  
 Unit 404 2-6 Boundary Row London  
 Unit 405 2-6 Boundary Row London  
 Unit 406 2-6 Boundary Row London  
 Unit 403 2-6 Boundary Row London  
 Unit 315 2-6 Boundary Row London  
 Unit 401 2-6 Boundary Row London  
 Unit 402 2-6 Boundary Row London  
 Unit 411 2-6 Boundary Row London  
 First To Third Floors 8 Boundary Row  
 London  
 Ground Floor 8 Boundary Row London  
 Unit 410 2-6 Boundary Row London  
 Unit 407 2-6 Boundary Row London  
 Unit 408 2-6 Boundary Row London  
 Unit 409 2-6 Boundary Row London  
 Unit 314 2-6 Boundary Row London  
 8 Bell House 57 Webber Street London  
 Basement And Ground Floors Bell House 57  
 Webber Street  
 6 Bell House 57 Webber Street London  
 7 Bell House 57 Webber Street London  
 Apartment 6 10 Rushworth Street London  
 Apartment 7 10 Rushworth Street London  
 Apartment 8 10 Rushworth Street London  
 Apartment 5 10 Rushworth Street London  
 Apartment 2 10 Rushworth Street London  
 Apartment 3 10 Rushworth Street London  
 Apartment 4 10 Rushworth Street London  
 Flat 6 Globe View House 171 Blackfriars  
 Road  
 Flat 26 Globe View House 171 Blackfriars  
 Road  
 Flat 27 Globe View House 171 Blackfriars  
 Road  
 Flat 28 Globe View House 171 Blackfriars  
 Road  
 Flat 25 Globe View House 171 Blackfriars  
 Road  
 Flat 22 Globe View House 171 Blackfriars  
 Road  
 Flat 23 Globe View House 171 Blackfriars  
 Road  
 Flat 24 Globe View House 171 Blackfriars  
 Road  
 2 Surrey Row London SE1 0FX  
 Flat 32 Globe View House 171 Blackfriars  
 Road  
 Flat 29 Globe View House 171 Blackfriars  
 Road  
 Flat 30 Globe View House 171 Blackfriars  
 Road  
 Flat 31 Globe View House 171 Blackfriars  
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 Flat 21 Globe View House 171 Blackfriars  
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 Flat 11 Globe View House 171 Blackfriars  
 Road  
 Flat 12 Globe View House 171 Blackfriars  
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 Flat 13 Globe View House 171 Blackfriars  
 Road  
 Flat 10 Globe View House 171 Blackfriars  
 Road  
 Flat 7 Globe View House 171 Blackfriars  
 Road  
 Flat 8 Globe View House 171 Blackfriars  
 Road  
 Flat 6 Zeiss Court 46 Lancaster Street  
 Flat 7 Zeiss Court 46 Lancaster Street  
 Flat 4 Zeiss Court 46 Lancaster Street  
 Flat 1 Zeiss Court 46 Lancaster Street  
 Flat 2 Zeiss Court 46 Lancaster Street  
 Flat 3 Zeiss Court 46 Lancaster Street  
 Flat 12 Zeiss Court 46 Lancaster Street  
 Flat 13 Zeiss Court 46 Lancaster Street  
 Flat 14 Zeiss Court 46 Lancaster Street  
 Flat 11 Zeiss Court 46 Lancaster Street  
 Flat 9 Sharpley Court 8A Pocock Street  
 Flat 6 Sharpley Court 8A Pocock Street  
 Flat 7 Sharpley Court 8A Pocock Street  
 Flat 8 Sharpley Court 8A Pocock Street  
 Flat 28 Sharpley Court 8A Pocock Street  
 Third Floor 88-89 Blackfriars Road London  
 Fourth Floor 88-89 Blackfriars Road London  
 18-19 Rushworth Street London SE1 0RB  
 Second Floor 88-89 Blackfriars Road  
 London  
 Church Hall St Alphege Church Kings Bench  
 Street  
 Excluding Third Floor And Fourth Floor 207  
 Waterloo Road London  
 30 Buckstone Apartments 140 Blackfriars  
 Road London  
 31 Buckstone Apartments 140 Blackfriars  
 Road London  
 40 Buckstone Apartments 140 Blackfriars  
 Road London  
 41 Buckstone Apartments 140 Blackfriars  
 Road London  
 42 Buckstone Apartments 140 Blackfriars  
 Road London  
 39 Buckstone Apartments 140 Blackfriars  
 Road London  
 36 Buckstone Apartments 140 Blackfriars  
 Road London

37 Buckstone Apartments 140 Blackfriars Road London  
 38 Buckstone Apartments 140 Blackfriars Road London  
 28 Buckstone Apartments 140 Blackfriars Road London  
 18 Buckstone Apartments 140 Blackfriars Road London  
 19 Buckstone Apartments 140 Blackfriars Road London  
 Lower Ground Floor 1-7 Boundary Row London  
 Flat 31 Sharpley Court 8A Pocock Street 105 Blackfriars Road London SE1 8HW  
 1 Valentine Place London SE1 8QH  
 Flat 36 Sharpley Court 8A Pocock Street Ground Floor 1-7 Boundary Row London  
 Flat 8 7 Valentine Place London  
 Flat 9 7 Valentine Place London  
 Flat 7 7 Valentine Place London  
 Flat 4 7 Valentine Place London  
 Flat 5 7 Valentine Place London  
 Flat 6 7 Valentine Place London  
 11 Valentine Row London SE1 8BN  
 13 Valentine Row London SE1 8BN  
 15 Valentine Row London SE1 8BN  
 9 Valentine Row London SE1 8BN  
 3 Valentine Row London SE1 8BN  
 5 Valentine Row London SE1 8BN  
 7 Valentine Row London SE1 8BN  
 Flat 3 7 Valentine Place London  
 Flat 9 5 Valentine Place London  
 Flat 10 5 Valentine Place London  
 Flat 11 5 Valentine Place London  
 Flat 8 5 Valentine Place London  
 Flat 5 5 Valentine Place London  
 Flat 6 5 Valentine Place London  
 Flat 7 5 Valentine Place London  
 Flat 16 5 Valentine Place London  
 Flat 1 7 Valentine Place London  
 Flat 2 7 Valentine Place London  
 Flat 15 5 Valentine Place London  
 Flat 12 5 Valentine Place London  
 Flat 13 5 Valentine Place London  
 Flat 14 5 Valentine Place London  
 44 Buckstone Apartments 140 Blackfriars Road London  
 45 Buckstone Apartments 140 Blackfriars Road London  
 46 Buckstone Apartments 140 Blackfriars Road London  
 Flat 8 Zeiss Court 46 Lancaster Street  
 Flat 9 Zeiss Court 46 Lancaster Street  
 Flat 10 Zeiss Court 46 Lancaster Street  
 Flat 10 Clandon Buildings Boyfield Street  
 Flat 3 Merrow House Rushworth Street  
 Flat 9 Albury Buildings Boyfield Street  
 Flat 1 Clandon Buildings Boyfield Street  
 Flat 8 Albury Buildings Boyfield Street  
 Flat 5 Albury Buildings Boyfield Street  
 Flat 6 Albury Buildings Boyfield Street  
 Flat 7 Albury Buildings Boyfield Street  
 Flat 4 Clandon Buildings Boyfield Street  
 Flat 5 Clandon Buildings Boyfield Street  
 Flat 6 Clandon Buildings Boyfield Street  
 Flat 3 Clandon Buildings Boyfield Street  
 Flat 11 Clandon Buildings Boyfield Street  
 Flat 12 Clandon Buildings Boyfield Street  
 Flat 2 Clandon Buildings Boyfield Street  
 Flat 4 Albury Buildings Boyfield Street  
 Flat 17 Albury Buildings Boyfield Street  
 Flat 18 Albury Buildings Boyfield Street  
 Flat 19 Albury Buildings Boyfield Street  
 Flat 16 Albury Buildings Boyfield Street  
 Flat 13 Albury Buildings Boyfield Street  
 Flat 14 Albury Buildings Boyfield Street  
 Flat 15 Albury Buildings Boyfield Street  
 Flat 23 Albury Buildings Boyfield Street  
 Flat 24 Albury Buildings Boyfield Street  
 Flat 3 Albury Buildings Boyfield Street  
 17 Valentine Row London SE1 8BN  
 Flat 5 27 Webber Street London  
 Flat 6 27 Webber Street London  
 Flat 7 27 Webber Street London  
 Flat 4 27 Webber Street London  
 Flat 1 27 Webber Street London  
 Flat 2 27 Webber Street London  
 Flat 3 27 Webber Street London  
 Flat 12 27 Webber Street London  
 Flat 13 27 Webber Street London  
 Flat 11 27 Webber Street London  
 Flat 8 27 Webber Street London  
 Flat 9 27 Webber Street London  
 Flat 10 27 Webber Street London  
 Flat 4 1 Valentine Row London  
 Flat 5 1 Valentine Row London  
 Flat 6 1 Valentine Row London  
 Flat 3 1 Valentine Row London  
 19 Valentine Row London SE1 8BN  
 Flat 1 1 Valentine Row London  
 1 The Priory Webber Street London  
 Flat 4 Bazeley House Library Street  
 Flat 5 Bazeley House Library Street  
 7 The Priory Webber Street London  
 10 The Priory Webber Street London  
 11 The Priory Webber Street London  
 Friars Primary School Webber Street London  
 Flat 8 Clandon Buildings Boyfield Street  
 Flat 9 Clandon Buildings Boyfield Street  
 Flat 16 Stopher House 90 Webber Street  
 4 The Priory Webber Street London  
 55 Buckstone Apartments 140 Blackfriars Road London

56 Buckstone Apartments 140 Blackfriars Road London  
 57 Buckstone Apartments 140 Blackfriars Road London  
 54 Buckstone Apartments 140 Blackfriars Road London  
 51 Buckstone Apartments 140 Blackfriars Road London  
 52 Buckstone Apartments 140 Blackfriars Road London  
 53 Buckstone Apartments 140 Blackfriars Road London  
 13 Buckstone Apartments 140 Blackfriars Road London  
 13A Glade Path London SE1 8EG  
 14 Glade Path London SE1 8EG  
 15 Glade Path London SE1 8EG  
 15 Buckstone Apartments 140 Blackfriars Road London  
 20 Buckstone Apartments 140 Blackfriars Road London  
 17 Buckstone Apartments 140 Blackfriars Road London  
 14 Buckstone Apartments 140 Blackfriars Road London  
 16 Buckstone Apartments 140 Blackfriars Road London  
 25 Buckstone Apartments 140 Blackfriars Road London  
 26 Buckstone Apartments 140 Blackfriars Road London  
 27 Buckstone Apartments 140 Blackfriars Road London  
 24 Buckstone Apartments 140 Blackfriars Road London  
 21 Buckstone Apartments 140 Blackfriars Road London  
 22 Buckstone Apartments 140 Blackfriars Road London  
 23 Buckstone Apartments 140 Blackfriars Road London  
 43 Buckstone Apartments 140 Blackfriars Road London  
 1 Dibdin Apartments 149 Blackfriars Road London  
 2 Dibdin Apartments 149 Blackfriars Road London  
 3 Dibdin Apartments 149 Blackfriars Road London  
 62 Buckstone Apartments 140 Blackfriars Road London  
 59 Buckstone Apartments 140 Blackfriars Road London  
 60 Buckstone Apartments 140 Blackfriars Road London  
 61 Buckstone Apartments 140 Blackfriars Road London  
 8 Dibdin Apartments 149 Blackfriars Road London  
 9 Dibdin Apartments 149 Blackfriars Road London  
 10 Dibdin Apartments 149 Blackfriars Road London  
 7 Dibdin Apartments 149 Blackfriars Road London  
 4 Dibdin Apartments 149 Blackfriars Road London  
 5 Dibdin Apartments 149 Blackfriars Road London  
 6 Dibdin Apartments 149 Blackfriars Road London  
 58 Buckstone Apartments 140 Blackfriars Road London  
 48 Buckstone Apartments 140 Blackfriars Road London  
 49 Buckstone Apartments 140 Blackfriars Road London  
 50 Buckstone Apartments 140 Blackfriars Road London  
 47 Buckstone Apartments 140 Blackfriars Road London  
 1 Elliston Apartments 9 Glade Path London  
 12 Glade Path London SE1 8EG  
 8 Glade Path London SE1 8EG  
 10 Glade Path London SE1 8EG  
 2 Elliston Apartments 9 Glade Path London  
 3 Elliston Apartments 9 Glade Path London  
 16 Glade Path London SE1 8EG  
 13B Glade Path London SE1 8EG  
 7 Glade Path London SE1 8EG  
 Basement Front 82-83 Blackfriars Road London  
 Computacenter House 100 Blackfriars Road London  
 Basement Rear 82-83 Blackfriars Road London  
 Retail Unit North 160 Blackfriars Road London  
 5 The Priory Webber Street London  
 6 The Priory Webber Street London  
 3 The Priory Webber Street London  
 12 The Priory Webber Street London  
 13 The Priory Webber Street London  
 2 The Priory Webber Street London  
 Flat 12 Albury Buildings Boyfield Street  
 Flat 6 Markstone House Lancaster Street  
 Flat 7 Markstone House Lancaster Street  
 Flat 8 Markstone House Lancaster Street  
 Flat 5 Markstone House Lancaster Street  
 Flat 31 Markstone House Lancaster Street  
 Flat 32 Markstone House Lancaster Street  
 Flat 4 Markstone House Lancaster Street  
 Flat 12 Lingfield House Lancaster Estate Lancaster Street

Flat 13 Lingfield House Lancaster Estate Lancaster Street	4 Glade Path London SE1 8EG
Flat 14 Lingfield House Lancaster Estate Lancaster Street	5 Glade Path London SE1 8EG
Flat 36 Globe View House 27 Pocock Street	6 Glade Path London SE1 8EG
Flat 33 Globe View House 27 Pocock Street	3 Glade Path London SE1 8EG
Flat 34 Globe View House 27 Pocock Street	11 Glade Path London SE1 8EG
Flat 35 Globe View House 27 Pocock Street	1 Glade Path London SE1 8EG
Flat 44 Globe View House 27 Pocock Street	2 Glade Path London SE1 8EG
Flat 45 Globe View House 27 Pocock Street	4 Elliston Apartments 9 Glade Path London
Flat 46 Globe View House 27 Pocock Street	3 Buckstone Apartments 140 Blackfriars Road London
Flat 43 Globe View House 27 Pocock Street	4 Buckstone Apartments 140 Blackfriars Road London
Flat 40 Globe View House 27 Pocock Street	5 Buckstone Apartments 140 Blackfriars Road London
Flat 41 Globe View House 27 Pocock Street	2 Buckstone Apartments 140 Blackfriars Road London
Flat 42 Globe View House 27 Pocock Street	20 Elliston Apartments 9 Glade Path London
Flat 62 Globe View House 27 Pocock Street	21 Elliston Apartments 9 Glade Path London
Flat 82 Globe View House 29 Pocock Street	1 Buckstone Apartments 140 Blackfriars Road London
Flat 83 Globe View House 29 Pocock Street	10 Buckstone Apartments 140 Blackfriars Road London
Flat 84 Globe View House 29 Pocock Street	11 Buckstone Apartments 140 Blackfriars Road London
Flat 81 Globe View House 29 Pocock Street	12 Buckstone Apartments 140 Blackfriars Road London
Flat 26 Markstone House Lancaster Street	9 Buckstone Apartments 140 Blackfriars Road London
Flat 27 Markstone House Lancaster Street	Flat 24 Bazeley House Library Street
Flat 24 Markstone House Lancaster Street	Flat 14 Bazeley House Library Street
Flat 25 Markstone House Lancaster Street	Flat 15 Bazeley House Library Street
Flat 15 Lingfield House Lancaster Estate Lancaster Street	Flat 16 Bazeley House Library Street
Flat 33 Lingfield House Lancaster Estate Lancaster Street	Flat 13 Bazeley House Library Street
Flat 4 Lingfield House Lancaster Estate Lancaster Street	Flat 12 59 Webber Street London
Flat 5 Lingfield House Lancaster Estate Lancaster Street	Flat 1 59 Webber Street London
Flat 32 Lingfield House Lancaster Estate Lancaster Street	Flat 2 59 Webber Street London
Flat 3 Lingfield House Lancaster Estate Lancaster Street	Flat 3 59 Webber Street London
Flat 30 Lingfield House Lancaster Estate Lancaster Street	Flat 12A 59 Webber Street London
Flat 31 Lingfield House Lancaster Estate Lancaster Street	Flat 12B 59 Webber Street London
Flat 1 Albury Buildings Boyfield Street	Flat 11 59 Webber Street London
Flat 10 Albury Buildings Boyfield Street	Flat 8 59 Webber Street London
Flat 11 Albury Buildings Boyfield Street	Flat 9 59 Webber Street London
Flat 9 Lingfield House Lancaster Estate Lancaster Street	Flat 10 59 Webber Street London
Flat 6 Lingfield House Lancaster Estate Lancaster Street	64 Webber Row London SE1 8QP
Flat 7 Lingfield House Lancaster Estate Lancaster Street	8 Webber Row London SE1 8QP
Flat 8 Lingfield House Lancaster Estate Lancaster Street	187 Waterloo Road London SE1 8UX
Flat 29 Lingfield House Lancaster Estate Lancaster Street	62 Webber Row London SE1 8QP
Flat 2 Lingfield House Lancaster Estate Lancaster Street	58 Webber Row London SE1 8QP
Retail Unit South 160 Blackfriars Road London	6 Webber Row London SE1 8QP
	60 Webber Row London SE1 8QP
	221 Waterloo Road London SE1 8XH
	225 Waterloo Road London SE1 8XH
	Flat 12 Algar House Webber Row Estate Webber Row
	Flat 17 Algar House Webber Row Estate Webber Row

Flat 14 Algar House Webber Row Estate  
 Webber Row  
 Flat 11 Algar House Webber Row Estate  
 Webber Row  
 Flat 13 Algar House Webber Row Estate  
 Webber Row  
 Flat 4 Dauncy House Webber Row Estate  
 Webber Row  
 Flat 13 Dauncy House Webber Row Estate  
 Webber Row  
 Flat 14 Dauncy House Webber Row Estate  
 Webber Row  
 Flat 15 Dauncy House Webber Row Estate  
 Webber Row  
 Flat 12 Dauncy House Webber Row Estate  
 Webber Row  
 Flat 1 Dauncy House Webber Row Estate  
 Webber Row  
 Flat 10 Dauncy House Webber Row Estate  
 Webber Row  
 Flat 11 Dauncy House Webber Row Estate  
 Webber Row  
 Flat 2 Dauncy House Webber Row Estate  
 Webber Row  
 Flat 20 Dauncy House Webber Row Estate  
 Webber Row  
 Unit 21 33 Rushworth Street London  
 3 Lagare Apartments 51 Surrey Row London  
 14 Rushworth Street London SE1 0RB  
 20 Rushworth Street London SE1 0RB  
 1 Lagare Apartments 53 Surrey Row London  
 10 Webber Row London SE1 8QP  
 12 Webber Row London SE1 8QP  
 14 Webber Row London SE1 8QP  
 The Crown 108 Blackfriars Road London  
 90 Blackfriars Road London SE1 8HW  
 22 Webber Row London SE1 8QP  
 24 Webber Row London SE1 8QP  
 26 Webber Row London SE1 8QP  
 20 Webber Row London SE1 8QP  
 16 Webber Row London SE1 8QP  
 18 Webber Row London SE1 8QP  
 Estate Office Pakeman House Pocock Street  
 Second Floor 24-28 Rushworth Street  
 London  
 Third Floor 24-28 Rushworth Street London  
 Ground Floor 24-28 Rushworth Street  
 London  
 Estate Workshop Pakeman House Pocock  
 Street  
 First Floor 2 Valentine Place London  
 Second Floor 2 Valentine Place London  
 Third Floor 2 Valentine Place London  
 Part Third Floor South 1-2 Silex Street  
 London  
 37 Rushworth Street London SE1 0RB  
 Second Floor 1-2 Silex Street London  
 Part Third Floor North 1-2 Silex Street  
 London  
 20 Pocock Street London SE1 0BW  
 18 Pocock Street London SE1 0BW  
 Newspaper House Kings Bench Street  
 London  
 3 Delarch House Webber Row Estate  
 Webber Row London  
 Flat 20 Lingfield House Lancaster Estate  
 Lancaster Street  
 Flat 21 Lingfield House Lancaster Estate  
 Lancaster Street  
 Flat 19 Lingfield House Lancaster Estate  
 Lancaster Street  
 Flat 16 Lingfield House Lancaster Estate  
 Lancaster Street  
 Flat 17 Lingfield House Lancaster Estate  
 Lancaster Street  
 Flat 18 Lingfield House Lancaster Estate  
 Lancaster Street  
 1 Bench Apartments 22 Kings Bench Street  
 London  
 2 Bench Apartments 22 Kings Bench Street  
 London  
 11 Bench Apartments 22 Kings Bench Street  
 London  
 12 Bench Apartments 22 Kings Bench Street  
 London  
 10 Bench Apartments 22 Kings Bench Street  
 London  
 7 Bench Apartments 22 Kings Bench Street  
 London  
 8 Bench Apartments 22 Kings Bench Street  
 London  
 9 Bench Apartments 22 Kings Bench Street  
 London  
 Flat 3A Vaughan House Nelson Square  
 Flat 12 Polychrome Court 261 Waterloo  
 Road  
 Flat 7 Polychrome Court 261 Waterloo Road  
 Flat 8 Polychrome Court 261 Waterloo Road  
 Flat 11 Polychrome Court 261 Waterloo  
 Road  
 Flat 5 Polychrome Court 241 Waterloo Road  
 Flat 6 Polychrome Court 241 Waterloo Road  
 223 Waterloo Road London SE1 8XH  
 Suite 309 154-156 Blackfriars Road London  
 Suite 210 154-156 Blackfriars Road London  
 Suite 303 To 307 154-156 Blackfriars Road  
 London  
 207 Waterloo Road London SE1 8XD  
 Suite 311 154-156 Blackfriars Road London  
 Suite 110 154-156 Blackfriars Road London  
 87 Blackfriars Road London SE1 8HA  
 2 Burrows Mews London SE1 8LD  
 Suite 111 154-156 Blackfriars Road London  
 Suite G06 154-156 Blackfriars Road London

Suite 209 154-156 Blackfriars Road London  
 109 Blackfriars Road London SE1 8HW  
 191 Waterloo Road London SE1 8UX  
 Suite 304 154-156 Blackfriars Road London  
 Suite 106 154-156 Blackfriars Road London  
 Suite 203 And 204 154-156 Blackfriars Road  
 London  
 Suite 308 154-156 Blackfriars Road London  
 Suite 112 To 133 154-156 Blackfriars Road  
 London  
 First Floor 1-7 Boundary Row London  
 Suite 113 154-156 Blackfriars Road London  
 Suite 212 154-156 Blackfriars Road London  
 Suite 305 154-156 Blackfriars Road London  
 First Floor Flat 81 Blackfriars Road London  
 Flat 1 84 Blackfriars Road London  
 Flat 2 84 Blackfriars Road London  
 Manna House 8-20 Pocock Street London  
 59A Webber Street London SE1 0RF  
 Flat 4 Polychrome Court 241 Waterloo Road  
 Unit 3 109-115 Blackfriars Road London  
 Flat 4 Garrett House Burrows Mews  
 Flat 1 Garrett House Burrows Mews  
 Unit 1 And Unit 2 109-115 Blackfriars Road  
 London  
 14 The Priory Webber Street London  
 15 The Priory Webber Street London  
 1 Pontypool Place London SE1 8QF  
 Flat 2 Garrett House Burrows Mews  
 3A St Georges Cottages Glasshill Street  
 London  
 3B St Georges Cottages Glasshill Street  
 London  
 3 Kings Bench Street London SE1 0QX  
 Basement And Part Ground Floor 88-89  
 Blackfriars Road London  
 Friden House 96-101 Blackfriars Road  
 London  
 8 Boundary Row London SE1 8HP  
 Basement And Ground Floor 176-177  
 Blackfriars Road London  
 First Floor 176-177 Blackfriars Road London  
 Second Floor 176-177 Blackfriars Road  
 London  
 Unit 5 109-115 Blackfriars Road London  
 12 Delarch House Webber Row Estate  
 Webber Row London  
 13 Delarch House Webber Row Estate  
 Webber Row London  
 14 Delarch House Webber Row Estate  
 Webber Row London  
 11 Delarch House Webber Row Estate  
 Webber Row London  
 8 Delarch House Webber Row Estate  
 Webber Row London  
 9 Delarch House Webber Row Estate  
 Webber Row London  
 10 Delarch House Webber Row Estate  
 Webber Row London  
 19 Delarch House Webber Row Estate  
 Webber Row London  
 20 Delarch House Webber Row Estate  
 Webber Row London  
 Flat 28 Stopher House 90 Webber Street  
 Effingham House Arundel Street London  
 Flat 29 Stopher House 90 Webber Street  
 Flat 26 Stopher House 90 Webber Street  
 Flat 23 Stopher House 90 Webber Street  
 Flat 24 Stopher House 90 Webber Street  
 Flat 25 Stopher House 90 Webber Street  
 Flat 34 Stopher House 90 Webber Street  
 Flat 35 Stopher House 90 Webber Street  
 Flat 36 Stopher House 90 Webber Street  
 Flat 33 Stopher House 90 Webber Street  
 Flat 30 Stopher House 90 Webber Street  
 Flat 31 Stopher House 90 Webber Street  
 Flat 32 Stopher House 90 Webber Street  
 Flat 22 Stopher House 90 Webber Street  
 Flat 11 Stopher House 90 Webber Street  
 Flat 12 Stopher House 90 Webber Street  
 Flat 5 Quentin House Gray Street  
 Flat 35 Quentin House Gray Street  
 Flat 32 Quentin House Gray Street  
 Flat 33 Quentin House Gray Street  
 Flat 34 Quentin House Gray Street  
 Flat 48 Quentin House Chaplin Close  
 Flat 4 Mawdley House Webber Row Estate  
 Webber Row  
 Flat 5 Mawdley House Webber Row Estate  
 Webber Row  
 Flat 6 Mawdley House Webber Row Estate  
 Webber Row  
 Flat 3 Mawdley House Webber Row Estate  
 Webber Row  
 Flat 19 Mawdley House Webber Row Estate  
 Webber Row  
 Flat 2 Mawdley House Webber Row Estate  
 Webber Row  
 Flat 20 Mawdley House Webber Row Estate  
 Webber Row  
 Block T Flat 1 Peabody Square Blackfriars  
 Road  
 Block S Flat 1 Peabody Square Blackfriars  
 Road  
 Block A Flat 1 Peabody Square Blackfriars  
 Road  
 Flat 7 Mawdley House Webber Row Estate  
 Webber Row  
 Flat 8 Mawdley House Webber Row Estate  
 Webber Row  
 43 Webber Street London SE1 0RF  
 Flat 53 Stopher House 90 Webber Street  
 Flat 3 Garrett House Burrows Mews  
 1A The Priory Webber Street London

7B Kings Bench Street London SE1 0QX  
 Middle Floor Flat Alphege House 2 Pocock  
 Street  
 2 Pontypool Place London SE1 8QF  
 7A Kings Bench Street London SE1 0QX  
 Ground Floor 85 Blackfriars Road London  
 Second Floor 1-7 Boundary Row London  
 Flat 5D Quentin House Gray Street  
 Unit 22 33 Rushworth Street London  
 Block M Flat 4 Peabody Square Blackfriars  
 Road  
 Block R Flat 3 Peabody Square Blackfriars  
 Road  
 Block R Flat 4 Peabody Square Blackfriars  
 Road  
 Block R Flat 5 Peabody Square Blackfriars  
 Road  
 Block M Flat 5 Peabody Square Blackfriars  
 Road  
 Block M Flat 6 Peabody Square Blackfriars  
 Road  
 Block M Flat 3 Peabody Square Blackfriars  
 Road  
 Block R Flat 10 Peabody Square Blackfriars  
 Road  
 Block R Flat 11 Peabody Square Blackfriars  
 Road  
 Block M Flat 2 Peabody Square Blackfriars  
 Road  
 Block R Flat 2 Peabody Square Blackfriars  
 Road  
 Block Q Flat 2 Peabody Square Blackfriars  
 Road  
 Block Q Flat 3 Peabody Square Blackfriars  
 Road  
 Block Q Flat 4 Peabody Square Blackfriars  
 Road  
 Block P Flat 11 Peabody Square Blackfriars  
 Road  
 Block P Flat 8 Peabody Square Blackfriars  
 Road  
 Block P Flat 9 Peabody Square Blackfriars  
 Road

Block P Flat 10 Peabody Square Blackfriars  
 Road  
 Block Q Flat 9 Peabody Square Blackfriars  
 Road  
 Block Q Flat 10 Peabody Square Blackfriars  
 Road  
 Block Q Flat 11 Peabody Square Blackfriars  
 Road  
 Block Q Flat 8 Peabody Square Blackfriars  
 Road  
 Block Q Flat 5 Peabody Square Blackfriars  
 Road  
 Block Q Flat 6 Peabody Square Blackfriars  
 Road  
 Block Q Flat 7 Peabody Square Blackfriars  
 Road  
 2A Burrows Mews London SE1 8LD  
 Flat 73 Patrick Court 92 Webber Street  
 Flat 74 Patrick Court 92 Webber Street  
 Flat 75 Patrick Court 92 Webber Street  
 Flat 65 Patrick Court 92 Webber Street  
 Flat 55 Patrick Court 92 Webber Street  
 Flat 56 Patrick Court 92 Webber Street  
 Flat 57 Patrick Court 92 Webber Street  
 Flat 54 Patrick Court 92 Webber Street  
 Flat 51 Patrick Court 92 Webber Street  
 Flat 52 Patrick Court 92 Webber Street  
 Flat 53 Patrick Court 92 Webber Street  
 Flat 62 Patrick Court 92 Webber Street  
 Flat 63 Patrick Court 92 Webber Street  
 Flat 64 Patrick Court 92 Webber Street  
 Flat 61 Patrick Court 92 Webber Street  
 Flat 58 Patrick Court 92 Webber Street  
 Flat 59 Patrick Court 92 Webber Street  
 Block M Flat 11 Peabody Square Blackfriars  
 Road  
 Block N Flat 2 Peabody Square Blackfriars  
 Road  
 Block N Flat 3 Peabody Square Blackfriars  
 Road

**Re-consultation:** n/a



**APPENDIX 2****Consultation responses received****Internal services**

Design and Conservation Team  
 Transport Policy  
 Highways Development and Management  
 Environmental Protection  
 Flood Risk Management & Urban Drainage  
 Ecology  
 Archaeology  
 Urban Forester

**Statutory and non-statutory organisations**

Environment Agency  
 Thames Water  
 Transport for London  
 London Underground  
 London Fire & Emergency Planning Authority  
 Metropolitan Police Service (Designing Out Crime)  
 Natural England

**Neighbour and local groups consulted:**

N7 Peabody Square Blackfriars Road London	32 Sharpley Ct 8a Pocock Street London
13 Sharpley Court 8a Pocock St London	Flat 7 57 Webber Street London
11 Windmill Gardens Leicester LE8 0LX	Flat 7 1 Valentine Row London
28 pakeman house Pocock st London	24 Sharpley Court 8A Pocock Street London
Flat 40, Pakeman House London SE1 0BH	11 Tadworth House Webber Street London
13 Bazeley House Library Street London	Flat 32 Sharpley Court 8A Pocock Street London
1 The Priory Webber Street London	Flat 23, Sharpley Court 8A Pocock Street LONDON
2 Murton Court Hillside Road St Albans	Flat 5 7 Valentine Place London
Sharpley Court Pocock Street London	Flat 12 Sharpley Court 8a Pocock Street London
9 Sharpley Court 8A Pocock Street London	Flat 118 Rowland Hill House Nelson Square
20 Sharpley Court 8a Pocock Street London	Flat 12 27 Webber Street London
2 St Albans AL13QT	
Flat 5, 7 Valentine Place London SE1 8QH	
109-115 Blackfriars Rd London SE1 8HW	

## APPENDIX 3

## RELEVANT PLANNING HISTORY

Reference and Proposal	Status
<p><b>18/AP/1215</b> Erection of a 10 storey building (40.23m AOD) with basement, comprising a 220 bedroom hotel with ancillary restaurant (Class C1); flexible office space (Class B1); retail units (Class A1/A3); creation of public space; landscaping and associated works. Works to the existing building at ground and roof levels (including a new rooftop terrace, enclosure and PV panels); elevational alteration; creation of a new entrance and the installation of an architectural feature along the Blackfriars Road elevation.</p>	<p>Refused 19/12/2018</p>
<p><b>17/EQ/0104</b> Construction of a rear extension to create a C.260 bed hotel.</p>	<p>Pre-Application Enquiry Closed 01/08/2017</p>
<p><b>14/AP/3816</b> Replace existing double doors with new single fully glazed aluminium framed entrance door and new aluminium framed glazing panel to match existing adjacent.</p>	<p>Application Not Required 08/05/2015</p>
<p><b>13/AP/2123</b> Details prior to the occupation of the office space certified Post Construction review (or other verification process ) as required by condition 3 of planning permission dated 04/06/2013 LDS:REG.NO.12-AP-4091 for variation of condition 2 (approved drawings) of planning permission 11-AP-110799 ( for the erection of a five storey building on the site of the former public house, comprising of an office unit (Class B1) on the ground floor with cycle and refuse storage and the provision of terraces on the front and rear of the building) in order to provide a new basement area for office use (use class B1)and alterations to the access routes on the ground floor and basement areas and alterations to the refuse and cycle arrangements on the ground floor.</p>	<p>Application withdrawn 18/08/2014</p>
<p><b>12/AP/2284</b> Change of use of part of ground floor from office (B1 use) to three units for A1 (retail), A2 (professional services) or A3 (cafe, restaurant) use and retention of an office unit (B1 use) together with associated elevational alterations comprising installation of new shop fronts, access doors and access ramps and installation of cycle stands to the front and external elevational changes and construction of riser ducts to the rear in connection with the refurbishment of the upper floors for continued office use.</p>	<p>Granted 13/09/2012</p>
<p><b>12/AP/4091</b> Variation of Condition 2 (approved drawings) of planning permission 11-AP-1107 (for the erection of a five storey building on the site of the former public house, comprising of an office unit (Class B1) on the ground floor with cycle and refuse storage and the provision of 3, one bedroomed flats and 5, two bedroomed flats on the upper floors, together with the provision of terraces on the front and rear of the building) in order to provide a new basement area for office use (use class B1) and alterations to the access routes on the ground floor and basement areas and alterations to the refuse and cycle arrangements on the ground floor.</p>	<p>Granted 04/06/2013</p>

<p><b>11/AP/1107</b> The erection of a five storey building on the site of the former public house, comprising of an office unit (Class B1) on the ground floor with cycle and refuse storage and the provision of 3, one bedroomed flats and 5, two bedroomed flats on the upper floors, together with the provision of terraces on the front and rear of the building.</p>	<p>Granted with unilateral undertaking 22/12/2011</p>
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## RECOMMENDATION

This document shows the case officer's recommended decision for the application referred to below.  
This document is not a decision notice for this application.

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<b>Applicant</b>	C/O Agent AG EL 160 Blackfriars Road BV	<b>Reg. Number</b>	20/AP/0556
<b>Application Type Recommendation</b>	Major application	<b>Case Number</b>	1390-157

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### Draft of Decision Notice

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**for the following development:**

Erection of an eight storey building with basement, comprising a hotel (Class C1), flexible commercial or community unit (Class B1/D1), retail floorspace (Class A1/A3), creation of public space, landscaping and associated works. Works to the existing office building at ground and roof levels (including a new rooftop terrace, balustrades and PV panels); elevational alterations; and alterations associated with the creation of a new entrance on the Blackfriars Road elevation.

160 Blackfriars Road London Southwark

**In accordance with application received on 14 February 2020**

**and Applicant's Drawing Nos.:**

Existing Plans

Proposed Plans

Floor Plans - Proposed 10937-EPR-00-01-TP-A-0201 REV 2- PROPOSED FIRST FLOOR ROOF PLAN received 03/06/2020

Floor Plans - Proposed 10937-EPR-00-01-TP-A-0204 REV 1 -PROPOSED FIRST FLOOR PLAN received 14/02/2020

Floor Plans - Proposed 10937-EPR-00-02-TP-A-0205 REV 1 - PROPOSED SECOND FLOOR PLAN received 14/02/2020

Floor Plans - Proposed 10937-EPR-00-03-TP-A-0206 REV 1 - PROPOSED THIRD FLOOR PLAN received 14/02/2020

Floor Plans - Proposed 10937-EPR-00-04-TP-A-0207 REV 1 - PROPOSED FOURTH FLOOR PLAN received 14/02/2020

Floor Plans - Proposed 10937-EPR-00-05-TP-A-0208 REV 1 - PROPOSED FIFTH FLOOR PLAN received 14/02/2020

Floor Plans - Proposed 10937-EPR-00-06-TP-A-0209 REV 1 - PROPOSED SIXTH FLOOR PLAN received 14/02/2020

Floor Plans - Proposed 10937-EPR-00-07-TP-A-0210 REV 1 - PROPOSED SEVENTH FLOOR received 14/02/2020

Floor Plans - Proposed 10937-EPR-00-08-TP-A-0211 REV 1 - PROPOSED ROOF PLAN received 14/02/2020

Elevations - Proposed 10937-EPR-00-AA-TP-A-0501 REV 2 - PROPOSED SECTION A received 03/06/2020

Elevations - Proposed 10937-EPR-00-BB-TP-A-0502 REV 2 - PROPOSED SECTION B received 03/06/2020

Floor Plans - Proposed 10937-EPR-00-BS-TP-A-0199 REV 1 - PROPOSED BASEMENT PLAN HOTEL received 14/02/2020

Elevations - Proposed 10937-EPR-00-EA-TP-A-0401 REV 1 - PROPOSED EAST ELEVATION received 14/02/2020

Floor Plans - Proposed 10937-EPR-00-GF-TP-A-0200 REV 3 - PROPOSED GROUND FLOOR PLAN received 03/06/2020

Floor Plans - Proposed 10937-EPR-00-GF-TP-A-0202 REV 4- PROPOSED GROUND PLAN HOTEL ENTRANCE received 03/06/2020

Floor Plans - Proposed 10937-EPR-00-GF-TP-A-0203 REV 2 - PROPOSED GROUND FLOOR PLAN HOTEL received 03/06/2020

Elevations - Proposed 10937-EPR-00-NO-TP-A-0402 REV 1 - PROPOSED NORTH ELEVATION received 14/02/2020

Elevations - Proposed 10937-EPR-00-SO-TP-A-0403 REV 1 - PROPOSED SOUTH ELEVATION received 14/02/2020

Elevations - Proposed 10937-EPR-00-WE-TP-A-0400 REV 2 - PROPOSED WEST ELEVATION ON BLACKFRIARS ROAD received 03/06/2020

Elevations - Proposed 10937-EPR-00-WE-TP-A-0404 REV 1 - PROPOSED WEST ELEVATION FROM INTERNAL COURTYARD received 14/02/2020

Plans - Proposed 10937-EPR-00-XX-TP-A-0101 REV 3 PROPOSED SITE PLAN received 09/03/2020

Elevations - Proposed 10937-EPR-00-XX-TP-A-0405 REV 2 PROPOSED SERVICE YARD NORTH SIDE ELEVATION received 09/03/2020

Plans - Proposed 10937-EPR-00-XX-TP-A-0510 - PROPOSED SITE SECTIONS received 14/02/2020

Plans - Proposed 10937-EPR-00-BS-TP-A-0198 REV 1 - EXISTING BASEMENT PLAN PROPOSED WORKS received 14/02/2020

Elevations - Proposed 10937-EPR-00-XX-TP-A-0410 REV 1 TYPICAL ELEVATION BAY received 14/02/2020

Elevations - Proposed 10937-EPR-00-XX-TP-A-0411 REV 1 TYPICAL ELEVATION DETAILS received 14/02/2020

Elevations - Proposed 10937-EPR-00-XX-TP-A-0412 REV 2 COURTYARD ELEVATIONS received 03/06/2020

Elevations - Proposed 10937-EPR-00-XX-TP-A-0413 REV 1 FRIARS YARD HOTEL ELEVATION HORIZONTAL BRICK SETTING OUT received 14/02/2020

Elevations - Proposed 10937-EPR-ZZ-GF-TP-A-0414 REV 1 FRIARS YARD ENTRANCE BAY DETAILS BRICK DETAILING received 14/02/2020

Plans - Proposed 10937-EPR-00-XX-TP-A-0550 REV 3 - SITE SECTION THROUGH SCHOOL received 03/06/2020

Plans - Proposed 10937-EPR-00-08-DR-A-0213 Rev 2 Proposed Roof Plan on Existing Office Building received 06/04/2020

Elevations - Proposed 10937-EPR-00-GF-DR-A-0415 Rev 1 Ground Floor Single Storey Elevations received 06/04/2020

#### Other Documents

Site location plan 10937-EPR-00-XX-TP-A-0015 REV 1 LOCATION PLAN received 14/02/2020

#### **Time limit for implementing this permission and the approved plans**

1. The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:

(SEE LIST ABOVE)

Reason:

For the avoidance of doubt and in the interests of proper planning.

2. The development hereby permitted shall be begun before the end of three years from the date of this permission.

Reason:

As required by Section 91 of the Town and Country Planning Act 1990 as amended.

**Permission is subject to the following Pre-Commencements Condition(s)**

3. INCLUSIVE ACCESS TO BASEMENT

Prior to any below ground works hereby authorised being undertaken, a detailed plan showing step free access from the basement car parking area to ground floor level of the hotel and workspace/community use unit, and detailing any valet parking arrangements shall be submitted to and approved in writing by the Local Planning Authority. The development shall be constructed in accordance with the approved details.

Reason:

To ensure that disabled people and the mobility impaired have appropriate means of access and egress to the basement parking areas in accordance with the National Planning Policy Framework (2019), Strategic Policy 2 - Sustainable Transport of the Core Strategy (2011) and Saved Policy 5.7 Parking standards for disabled people and the mobility impaired of the Southwark Plan (2007).

4. ARCHAEOLOGICAL FIELDWORK

Prior to any below ground works hereby authorised being undertaken, the applicant shall:

- A. Secure the implementation of a programme of archaeological evaluation (initial investigative trial trenching) in accordance with a written scheme of investigation (WSI), which has been submitted to and approved in writing by the Local Planning Authority;
- B. Submit a report on the results of these evaluation works to the Local Planning Authority for approval in writing. No further demolition or development shall take place until that written approval is received, which will either allow the development to be carried out without further evaluation, or will require:
- C. The implementation of a further programme of archaeological work, known as archaeological mitigation. Archaeological mitigation can involve a range of possible options, including: preservation of archaeological remains by record (archaeological excavation and removal); and/or in situ (preservation on the site by design or by the implementation of an approved preservation regime); or further options to investigate, monitor (watching brief), model or sample archaeological deposits. This further programme of archaeological work shall be in accordance with a second (Stage C) written scheme of investigation (WSI) for archaeological mitigation, which shall be submitted to the Local Planning Authority for approval in writing.

Reason:

To ensure the preservation of archaeological remains by record or in situ, to identify and record any features of archaeological interest discovered during the works, and in order to mitigate the impact of the works on the archaeological resource, in accordance with the National Planning

Policy Framework (2019), policy 7.8 (Heritage assets and archaeology) of the London Plan (2016), policy 12 (Design and Conservation) of the Southwark Core Strategy (2011) and saved policy 3.19 (Archaeology) of the Southwark Unitary Development Plan (2007).

## 5. BASEMENT AND FOUNDATION DESIGN

Prior to any below ground works hereby authorised being undertaken, a detailed scheme showing the complete scope and arrangement of the basement and foundation design, and all associated subterranean groundworks, including the construction methods shall be submitted to and approved by the Local Planning Authority. The submitted documents should show how archaeological remains will be protected by a suitable mitigation strategy. The development shall only be carried out in accordance with the approval given.

### Reason:

In order that all below ground impacts of the proposed development are known and an appropriate protection and mitigation strategy is achieved to preserve archaeological remains by record and/or in situ in accordance with Strategic Policy 12 - Design and Conservation of the Core Strategy (2011), Saved Policy 3.19 Archaeology of the Southwark Plan (2007) and the National Planning Policy Framework (2019).

## 6. SITE CONTAMINATION

- a) Prior to any below ground works hereby authorised being undertaken, a site investigation and risk assessment shall be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site.
  - i) The Phase 1 (desk study, site categorisation; sampling strategy etc.) shall be submitted to the Local Planning Authority for approval before the commencement of any intrusive investigations.
  - ii) Any subsequent Phase 2 (site investigation and risk assessment) shall be conducted in accordance with any approved scheme and submitted to the Local Planning Authority for approval prior to the commencement of any remediation that might be required.
- b) In the event that contamination is present, a detailed remediation strategy to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment shall be prepared and submitted to the Local Planning Authority for approval in writing. The scheme shall ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out in accordance with its terms prior to the commencement of development, other than works required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority shall be given two weeks written notification of commencement of the remediation scheme works.
- c) Following the completion of the works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed shall be submitted to and approved in writing by the Local Planning Authority.
- d) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to

the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-c above.

#### Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007), strategic policy 13' High environmental standards' of the Core Strategy (2011) and the National Planning Policy Framework (2019).

### 7. BASEMENT IMPACT ASSESSMENT

No below ground works shall commence until suitable investigations are undertaken to determine the ground and groundwater conditions (including levels) at the site and a Basement Impact Assessment (BIA) have been submitted to and approved in writing by the Local Planning Authority. This should include groundwater flood risk mitigation measures as required, with the measures constructed to the approved details. The BIA shall assess if the lowest level of the basement will be above, or below the groundwater levels recorded from the ground investigations. The BIA shall consider fluctuations in groundwater levels and the risks this can pose to the site and shall include a plan of the basement area within the boundary of the site, with any known (investigated) basements and subterranean structures adjacent to the site. This is to see if there may be a risk of obstructing groundwater flows which could potentially cause a build up of pressure on the upstream side of the subterranean structures.

Further guidance on preparing BIA can be found in appendix to our SFRA 2016 here: <https://www.southwark.gov.uk/environment/flood-risk-management/strategic-flood-risk-assessmentsfra?chapter=2>

The development shall be carried out in accordance with the approved details.

#### Reason:

To minimise the potential for the site to contribute to changes in groundwater conditions and any subsequent flooding in accordance with the Southwark Strategic Flood Risk Assessment (2016), the National Planning Policy Framework (2019), Strategic Policy 13 High Environmental Standards of the Core Strategy (2011) and Saved Policy 3.1 Environmental Effects of the Southwark Plan (2007).

### 8. TREE PROTECTION

- 1) Prior to works commencing, including any demolition, for the hotel or workspace/community unit an Arboricultural Method Statement including an Arboricultural Survey of the trees near the eastern and southern boundaries of the site shall be submitted to and approved in writing by the Local Planning Authority.
  - a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal.
  - b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and



- building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.
- c) Cross sections shall be provided to show surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation.
- 2) Prior to works commencing, including any demolition, on the Blackfriars Road frontage alterations (including the ramps, stairs, retaining walls, ground level balustrade, entrance canopy), an Arboricultural Method Statement including an Arboricultural Survey of the trees on Blackfriars Road shall be submitted to and approved in writing by the Local Planning Authority.
    - a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal.
    - b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.
    - c) Cross sections shall be provided to show surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation.
  - 3) The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations.
  - 4) If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained tree is removed, uprooted is destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

#### Reason

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with the National Planning Policy Framework 2019 and policies of the Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of the Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

#### 9. SECURED BY DESIGN

- a) 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 relevant parts of the development in part i) or part ii) below and shall be implemented in accordance with the approved details prior to occupation:

- i) for the hotel or workspace/community unit;
  - ii) for the office entrance, public realm or the Blackfriars Road frontage alterations (theramps, stairs, retaining walls, ground level balustrade, entrance canopy).
- b) Prior to first occupation of the development a satisfactory Secured by Design inspection must take place and the resulting Secured by Design certificate submitted to and approved by the Local Planning Authority.

Reason:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with: the National Planning Policy Framework (2019); Strategic Policy 12 (Design and Conservation) of the Core Strategy (2011), and; Saved Policy 3.14 (Designing out crime) of the Southwark Plan (2007).

### **Permission is subject to the following Grade Condition(s)**

#### 10. MATERIAL SAMPLES

- a) Prior to above grade works commencing for those parts of the development comprising the hotel, workspace/community unit, office entrance or retail unit, sample panels of all external facing materials (including the brickwork styles, brick, bonding, coursing to the hotel and workspace/community unit) to be used in the carrying out the relevant part of the development shall be made available for inspection on site and approved in writing by the Local Planning Authority; the development shall not be carried out otherwise than in accordance with any such approval given
- b) Prior to works commencing (excluding demolition and preparation works) on the Blackfriars Road frontage alterations (including those parts of the development comprising the ramps stairs, retaining walls, ground level balustrade, entrance canopy and roof level balustrade), details and samples of all external facing materials for the relevant works to be used in the carrying out of these parts of the development shall be submitted to and approved in writing by the Local Planning Authority; the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with the National Planning Policy Framework (2019), Strategic Policy 12 - Design and Conservation of the Core Strategy (2011) and Saved Policies: 3.12 Quality in Design and 3.13 Urban Design of the Southwark Plan (2007).

#### 11. DETAILED DRAWINGS

Prior to above grade works commencing for the hotel, workspace/community unit, office entrance or retail unit, section detail-drawings at a scale of at least 1:10 through:

- the facades;
- parapets; and
- heads, cills and jambs of all openings

to be used in the carrying out the relevant part of this permission shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied as to the quality of the design and details in accordance with saved policies 3.12 Quality in Design and 3.13 Urban Design of the Southwark Plan (2007).

## 12. HARD AND SOFT LANDSCAPING

- a) Prior to above grade works commencing for the office entrance or retail unit (whichever is first), detailed drawings of a hard and soft landscaping scheme showing the treatment of the alterations to the Blackfriars Road frontage (including cross sections, surfacing materials, layouts, and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.
- b) Prior to above grade works commencing for the hotel, workspace/community unit (whichever is first) detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings and not addressed by part a) above (including cross sections, surfacing materials of any pathways, layouts, materials and edge details), tree pits in the new public realm and green walls, shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.
- c) The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2019; Strategic Policies 11 (Open Spaces and Wildlife), 12 (Design and conservation) and 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity), 3.12 (Quality in Design) 3.13 (Urban Design) and 3.28 (Biodiversity) of the Southwark Plan 2007.

## 13. ROOFS FOR BIODIVERSITY

- a) Prior to above grade works commencing for the hotel, workspace/community unit, details of the 'biosolar' green roofs and blue roofs to the hotel building hereby approved and the retained office building shall be submitted to and approved in writing by the Local Planning

Authority. The green roofs shall be:

- \* biodiversity based with extensive substrate base (depth 80-150mm);
  - \* laid out in accordance with agreed plans; and
  - \* planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on wildflower planting, and no more than a maximum of 25% sedum coverage).
- b) Prior to above grade works commencing for the office entrance or retail unit, details of the 'biosolar' green roofs to the retained office building shall be submitted to and approved in writing by the Local Planning Authority. The green roofs shall be:
- \* biodiversity based with extensive substrate base (depth 80-150mm);
  - \* laid out in accordance with agreed plans; and
  - \* planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on wildflower planting, and no more than a maximum of 25% sedum coverage).
- c) The green and blue roofs shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency. The development shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.
- d) Discharge of this condition will be granted on receiving the details of the green and blue roofs and Local Planning Authority agreeing the submitted plans, and once the green/brown roof(s) are completed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: Policies 2.18 (Green Infrastructure: the Multifunctional Network of Green and Open Spaces), 5.3 (Sustainable Design and Construction), 5.10 (Urban Greening) and 5.11 (Green Roofs and Development Site Environs) of the London Plan (2016); Strategic Policy 11 (Design and Conservation) of the Core Strategy (2011), and; Saved Policy 3.28 (Biodiversity) of the Southwark Plan (2007).

#### 14. SWIFT NESTING BRICKS

Prior to above grade works commencing for the hotel or workspace/community unit, details of Swift nesting bricks, shall be submitted to and approved in writing by the Local Planning Authority. No fewer than 12 nesting bricks shall be provided and the details shall include the exact location, specification and design of the habitats. The bricks shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

The Swift nesting bricks shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the nest features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the nest features have been installed to the agreed specification.

Reason:

To ensure the development provides the maximum possible provision towards creation of

habitats and valuable areas for biodiversity in accordance with policies: 5.10 and 7.19 of the London Plan (2016), Saved Policy 3.28 of the Southwark Plan (2007) and Strategic Policy 11 of the Core Strategy (2011).

#### 15. CYCLE STORAGE DETAILS

Prior to above grade works commencing for the hotel or workspace/community unit, details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles for staff and visitors shall be submitted to and approved in writing by the Local Planning Authority. The details as a minimum shall be in accordance with the London Plan Intend to Publish, and demonstrate how they comply with the London Cycle Design Standards (2016). The cycle parking shall be installed prior to the first occupation of the development. Thereafter the cycle parking facilities provided shall be retained and the space used for no other purpose, and the development shall not be carried out otherwise in accordance with any such approval given.

##### Reason:

In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with: the National Planning Policy Framework (2019); Strategic Policy 2 (Sustainable Transport) of the Core Strategy (2011), and; Saved Policy 5.3 (Walking and Cycling) of the Southwark Plan (2007).

#### 16. INTERNAL VENTILATION

Prior to above grade works commencing for the hotel or workspace/community unit, full particulars and details of a scheme for the internal ventilation of the development which shall include; appropriately located plant, inlets and outlets; filtration and treatment of incoming air to ensure it meets the national standards for external air quality; plant noise output levels; and a management and maintenance plan shall be submitted to and approved by the Local Planning Authority. The development shall be carried out prior to first occupation of the hotel or workspace/community unit, operated and maintained in accordance with the approval given.

##### Reason:

In order that the Local Planning Authority may be satisfied that the ventilation, ducting, filtration/treatment and ancillary equipment is incorporated as an integral part of the development for this site with external air quality below the national standard, in the interests of amenity in accordance with Strategic Policy 13 - High Environmental Standards of the Core Strategy (2011) and saved policy 3.2 Protection of Amenity of the Southwark Plan (2007).

### **Permission is subject to the following Pre-Occupation Condition(s)**

#### 17. LANDSCAPING MANAGEMENT PLAN

Prior to first occupation of the hotel or workspace/community unit (whichever is first) hereby permitted, a landscape management plan, including long- term design objectives, management responsibilities and maintenance schedules for all landscaped areas and ecological features, shall be submitted to and approved in writing by the local planning authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

The scheme shall include the following elements: public realm, biodiverse roofs, green walls, bird nesting features.

**Reason:**

This condition is necessary to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site, in line with the National Planning Policy Framework (2019). This is an mandatory criteria of BREEAM (LE5) to monitor long term impact on biodiversity a requirement is to produce a Landscape and Habitat Management Plan

18. DETAILS OF THE REFUSE STORAGE FACILITIES

Before the first occupation of the hotel or workspace/community unit (whichever is first) hereby permitted, details of the arrangements for the storing of refuse shall be submitted to and approved in writing by the Local Planning Authority and the approved facilities shall be provided and made available for use by the occupiers of the development. The facilities shall thereafter be retained and shall not be used or the space used for any other purpose.

**Reason:**

To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with: the National Planning Policy Framework 2019; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity) and 3.7 (Waste Reduction) of the Southwark Plan 2007.

19. COMMERCIAL KITCHEN EXTRACT VENTILATION

Prior to the commencement of use of the hotel or retail unit, full particulars and details of a scheme for the extraction and venting of odours, fats and particulate matter from the cooking activities from the kitchens within that part of the development shall be submitted to and approved by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given. Any exhaust flue from the commercial kitchen shall terminate at 1m above the building eaves.

**Reason**

In order to ensure that that any installed ventilation, ducting and ancillary equipment in the interests of amenity will not cause amenity impacts such as odour, fume or noise nuisance and will not detract from the appearance of the building in accordance with the National Planning Policy Framework (2019), Strategic Policy 13 - High Environmental Standards of the Core Strategy (2011) and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

20. NOISE FROM AMPLIFIED MUSIC FROM NON-RESIDENTIAL PREMISES

Prior to the commencement of use of the Class A3 and Class D1 premises a scheme of sound insulation shall be submitted to the Local Planning Authority for approval. The scheme of sound insulation shall be installed to ensure that the LFmax sound from amplified and non-amplified music and speech shall not exceed the lowest L90 5min at 1m from the facade of nearby residential premises at all third octave bands between 63Hz and 8kHz. The scheme of sound insulation shall be constructed and installed in accordance with the approval given and shall be permanently maintained thereafter. Following completion of the development and prior to the commencement of use of the commercial premises a validation test shall be carried out. The results shall be submitted to the Local Planning Authority for approval in writing.

**Reason:**

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities associated with non-residential premises in accordance with the National Planning Policy Framework (2019), Strategic Policy 13 'High environmental standards' of the Core Strategy (2011) and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

**21. BREEAM**

- a) Prior to first occupation of the hotel or workspace/community unit (whichever is first) hereby permitted, the Local Planning Authority shall receive from the applicant and give written approval of an interim report/letter (together with any supporting evidence) from the licensed BREEAM assessor. The report/letter shall confirm that sufficient progress has been made in terms of detailed design, procurement and construction to be reasonably well assured that the development hereby approved will, once completed, achieve the agreed BREEAM Standards.
- b) Within six months of first occupation of the development hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed BREEAM standards have been met.

**Reason:**

To ensure the proposal complies with the National Planning Policy Framework (2019), Strategic Policy 13 - High Environmental Standards of the Core Strategy (2011) and Saved Policies 3.3 Sustainability and 3.4 Energy Efficiency of the Southwark Plan (2007).

**Permission is subject to the following compliance conditions****22. RESTRICTION ON THE INSTALLATION OF ROOF PLANT**

No roof plant, equipment or other structures, other than as shown on the plans hereby approved or approved pursuant to a condition of this permission, shall be placed on the roofs or be permitted to project above the roofline of any part of the building as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosures of any building hereby permitted.

**Reason:**

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with the National Planning Policy Framework (2019), Strategic Policy 12 - Design and Conservation of the Core Strategy (2011) and Saved Policies 3.2 Protection of Amenity and 3.13 Urban Design of the Southwark Plan (2007).

**23. RESTRICTION ON THE INSTALLATION OF TELECOMMUNICATIONS EQUIPMENT**

Notwithstanding the provisions of Part 16 of The Town & Country Planning (General Permitted Development) Order 2015 (as amended or re-enacted) no external telecommunications equipment or structures shall be placed on the roofs or any other part of a building hereby permitted, unless details of any telecommunications equipment specifically required for the hotel use only are submitted to and approved by the Local Planning Authority prior to its installation.

**Reason:**

In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with: the National Planning Policy Framework (2019); Strategic Policy 12 (Design and Conservation) of the Core Strategy (2011), and; Saved Policies 3.2 (Protection of Amenity) and 3.13 (Urban Design) of the Southwark Plan (2007).

**24. ELECTRIC VEHICLE CHARGING**

An electric vehicle charging point shall be provided to service a minimum of 50% of the car parking spaces provided for the development.

**Reason:**

To encourage the uptake of electric and hybrid vehicles and minimise the effect of the development on local air quality within the designated Air Quality Management Area in line with Policy 7.14 of the London Plan and to comply with parking standards in Policy 6.13 of the London Plan (2016).

**25. TERRACE HOURS OF USE**

The roof terrace on the retained office building shall be open to office workers only, and shall not be in use after 22:00 on any day. The roof terrace shall at no time be open to or used by guests of the hotel hereby permitted.

**Reason:**

To safeguard the amenities of neighbouring residential properties in accordance with the National Planning Policy Framework (2019), Strategic Policy 13 High environmental standards of the Core Strategy (2011) and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

**26. ROOFS TO BE USED ONLY IN EMERGENCY**

The roofs of the hotel building hereby approved shall not be used other than as a means of escape and shall not be used for any other purpose including use as a roof terrace or balcony or for the purpose of sitting out.

**Reason:**

In order that the privacy of neighbouring properties may be protected from overlooking from use of the roof area in accordance with the National Planning Policy Framework (2019), Strategic Policy 13 High environmental standards of the Core Strategy (2011) and Saved Policy 3.2 'Protection of Amenity' of the Southwark Plan (2007).

**27. CLASS A3 HOURS OF USE**

The commercial Class A3 use hereby permitted shall not be carried on outside of the hours of 08:00 to 23:00 on Sunday to Thursday, 08:00 to 00:00 Friday and Saturdays.

**Reason:**

To safeguard the amenities of neighbouring residential properties in accordance with the National Planning Policy Framework (2019), Strategic Policy 13 High environmental standards of the Core Strategy (2011) and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

**28. SERVICING HOURS**



Any deliveries or collections to the commercial units shall only be between the following hours: 07:00 to 22:00 on Monday to Fridays, 09:00 to 20:00 Saturdays and 10:00 to 16:00 on Sundays and Bank Holidays.

Reason:

To safeguard the amenity of neighbouring residential properties in accordance with the National Planning Policy Framework (2019), Strategic Policy 13 High environmental standards of the Core Strategy (2011) and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

29. RESTRICTION ON USE WITHIN THE USE CLASS HEREBY PERMITTED

Notwithstanding the provisions of Class D1 of the Town and Country Planning (Use Classes) Order and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment or enactment of those Orders) the use hereby permitted of the ground floor Class D1 unit shall not include any use as a place of worship, school, children's nursery or gym.

Reason:

Limited information of the precise use of the ground floor unit has been provided by the applicant, and given the broad range of uses within Class D1 the Local Planning Authority wishes to have the opportunity of exercising control over any subsequent alternative use within Class D1 particularly those that raise noise and transport issues that would require a detailed assessment, in accordance with: the National Planning Policy Framework 2019; Strategic Policy 13 (High environmental standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

30. NUMBER OF HOTEL BEDROOMS

The building hereby approved shall comprise a maximum of 169 hotel bedrooms.

Reason:

To ensure that the development is carried out in accordance with the approved plans and documents and otherwise conforms to the principles of sustainable development as described in the National Planning Policy Framework 2019.

31. FLOOD RISK ASSESSMENT

The ground floor finished floor level must be set no lower than 4.27m AOD metres above Ordnance Datum (mAOD), in line with the submitted '1561 - Blackfriars Road | Flood Risk Assessment and Drainage Strategy Report' by Heyne Tillet Steel (HTS) dated February 2020; Rev C, unless an alternative flood risk assessment is submitted to and approved by the Local Planning Authority.

Reason:

To ensure: the development is designed safely in reference to flood risk in accordance with The National Planning Policy Framework (2019), Strategic Policy 13 High Environmental Standards of the Core Strategy (2011) and Saved Policy 3.9 Water of the Southwark Plan (2007).

**Permission is subject to the following special conditions**

## 32. REPORTING OF ARCHAEOLOGICAL WORK

Within six months of the completion of the archaeological work on site, an assessment report detailing the proposals for the off-site analyses and post-excavation works, including publication of the site and preparation for deposition of the archive, shall be submitted to and approved in writing by the Local Planning Authority, and the works detailed in the assessment report shall not be carried out otherwise than in accordance with any such approval given. The assessment report shall provide evidence of the applicant's commitment to finance and resource these works to their completion.

## Reason:

In order that the archaeological interest of the site is secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Strategic Policy 12 - Design and Conservation of the Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2019.

## 33. PLANT NOISE

The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014. Prior to the plant being commissioned a validation test shall be carried out following completion of the development. The results shall be submitted to the Local Planning Authority for approval in writing. The plant and equipment shall be installed and constructed in accordance with the approval given and shall be permanently maintained thereafter.

## Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework (2019), Strategic Policy 13 High Environmental Standards of the Core Strategy (2011) and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

## 34. EXTERNAL LIGHTING

Details of any external lighting (including: design; power and position of luminaries; light intensity contours) of all affected external areas (including areas beyond the boundary of the development) shall be submitted to and approved by the Local Planning Authority prior to the installation of any such lighting. Prior to the external lighting being commissioned for use, a validation report shall be submitted to the Local Planning Authority for approval in writing. The development shall not be carried out or operated otherwise than in accordance with any such approval given. Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILE) Guidance Note 1 for the reduction of obtrusive light (2020).

## Reason:

In order that the Council may be satisfied as to the details of the development in the interest of

the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with the National Planning Policy Framework 2019, Strategic Policy 12 Design and Conservation and Strategic Policy 13 High environmental standards of the Core Strategy (2011), and Saved Policies 3.2 Protection of Amenity and 3.14 Designing out crime of the Southwark Plan (2007).

## Informatives

- 1 The application site falls within 'Town Centre' designation of the SSDM and the footways should be paved with granite natural stone paving slabs with 300mm wide granite kerbs. The applicant is to note that surface water from private areas is not permitted to flow onto public highway in accordance with Section 163 of the Highways Act 1980. Detailed drawings should be submitted as part of the s278 application confirming this requirement.
- 2 Air quality at this location does not meet the national standard for NO<sub>2</sub>. It is recommended that any external doors are fitted with automatic closers and that any air intake for ventilation purposes is situated on the rear façade of the development or the façade furthest from emissions sources such as busy roads.
- 3 The applicant is advised that to discharge the cycle parking condition, TfL expects to see the proposed layout accommodating at least:
  - ItP London Plan standard quantum of cycle parking;
  - At least five per cent of cycle parking should be Sheffield stands at wider spacing for larger cycles (1.8m spacing);
  - A proportion of standard spaced Sheffield stands to ensure a good mix of cycle parking solutions (for all ages and abilities).
  - 2500mm in front of the lowered frame of each two-tier rack.
  - The cycle parking will be assessed using the latest version of policy and LCDS.
- 4 The applicant is advised of the following comments from Thames Water

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. TW 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 [wwriskmanagement@thameswater.co.uk](mailto:wwriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.

There are public sewers crossing or close to the development. If planning significant work near TW

sewers, it's important that the applicant minimises the risk of damage. TW will need to check that the development doesn't limit repair or maintenance activities, or inhibit the services TW provides in any other way. The applicant is advised to read TW guide Working Near Or Diverting Our Pipes.

If planning on using mains water for construction purposes, it is important the applicant let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at [thameswater.co.uk](http://thameswater.co.uk).

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres per minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

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 TW's guide Working Near Our Assets to ensure workings are in line with the necessary processes needing to follow if considering working above or near TW's pipes or other structures.




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## Appeal Decision

Inquiry Held on 13-15 and 20 August 2019

Site visit made on 20 August 2019

**by David Nicholson RIBA IHBC**

an Inspector appointed by the Secretary of State

Decision date: 14<sup>th</sup> October 2019

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### Appeal Ref: APP/A5840/W/18/3219188

#### 160 Blackfriars Road and Land to the Rear, London SE1 8EZ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (T&CPA) against a refusal to grant planning permission.
  - The appeal is made by AG EL 160 Blackfriars Road BV against the decision of the Southwark Council.
  - The application Ref. 18/AP/1215, dated 6 April 2018, was refused by notice dated 19 December 2018.
  - The development proposed<sup>1</sup> is for: Erection of a 10 storey building (40.23m AOD) with basement, comprising a 220 bedroom hotel with ancillary restaurant (Class C1); flexible office space (Class B1); retail units (Class A1/A3); creation of public space; landscaping and associated works. Works to the existing building at ground and roof levels (including a new rooftop terrace, enclosure and PV panels); elevational alteration; creation of a new entrance and the installation of an architectural feature along the Blackfriars Road elevation.
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### Decision

1. The appeal is dismissed.

### Preliminary matters

2. Planning obligations were submitted by the developer and site owner to the Council in a Unilateral Undertaking under section 106 of the T&CPA (s106).
3. The Inquiry sat for 4 days. I held an accompanied site visit on the last day and carried out unaccompanied visits before and during the Inquiry.

### Main Issues

4. From the evidence before me, the written representations, and my inspections of the appeal site and its surroundings, I consider that the main issues are:
  - i. the effect of the proposals on the character and appearance of the area with particular regard to height and quality of design;
  - ii. their effect on the provision and concentration of visitor accommodation in the area, including its vitality and potential for other uses;
  - iii. whether the quality of the proposed accommodation would be acceptable;
  - iv. whether there would be any benefits that would outweigh any or all of the harm that might arise from the above issues in the overall planning balance.

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<sup>1</sup> As amended – see Statement of Common Ground (SoCG) dated July 2019

**Reasons***Character and appearance*

6. Blackfriars Road is a wide thoroughfare which forms an important artery through a mixed-use part of Southwark. The appeal site lies roughly halfway between Southwark Underground Station and St George's Circus, within the Central Activities Zone (CAZ) and the Bankside, Borough and London Bridge Opportunity Area. It is not far from Waterloo Station and the Southbank and is on many bus routes and a Cycle Superhighway. It has a Public Transport Accessibility Level (PTAL) of 6b (the highest). The site lies adjacent to Friars Primary School on Webber Street, and close to the Grade II listed Clanden House and Albury House on opposite sides of neighbouring Boyfield Street. It was common ground that the adjacent Blackfriars Foundry, on the corner with Webber Street, is a building of townscape merit.
7. The site itself includes part of an existing office building, with retail units on the ground floor, which forms a 'T' shape on plan with a large frontage along Blackfriars Road, and a shorter extrusion into the site. The street façade extends to 9 storeys or 28.9m above ground level with a slight set back to most of the width of the top floor behind a parapet. This increases to 32.4m to the top of the plant room, which is set further back from the road. The rear car park contains 70 parking spaces. The building was refurbished in 2013 and is fully let.
8. The proposed hotel would stand within the car park and would be linked to the existing 10-storey building. It would have a food and drink outlet on the ground floor, new public realm in the form of two open squares, set behind the existing offices and next to the proposed hotel, and a single storey affordable office building within the rear of the site. I saw that the car park is under used and note that the principle of making better and more effective use of the site was agreed with the Council.
9. The parapet height of the hotel building would be 32.9m; that of the plant enclosure 36.5m. The scheme would include a framed structure or pergola of about 4m in height around a rooftop terrace on top of the existing office building including where it fronts onto the road. The proposed hotel would be seen in public views, notably above Blackfriars Foundry, from the other side of Blackfriars Road, and from the relatively low rise Boyfield Street, particularly where it joins Webber Street at the entrance to the school.
10. Townscape studies examined the visibility of the proposals from neighbouring streets and the relationship it would have with the existing office building. For the amended scheme before me, this resulted in efforts to make the hotel appear subservient in height compared with the office building through a 'shoulder' set back at 6<sup>th</sup> floor level and the concept of a 'veil' to give a 'neutral backdrop' to the Foundry roof<sup>2</sup>. To my mind, these are acknowledgements that the hotel would be significantly higher than its neighbours and that there would be a need to soften, if not conceal, the prominence of the upper storeys.
11. The Council accepted that the hotel would not be much higher than the existing office and that this in turn is not much higher than adjacent buildings. Notwithstanding this concession<sup>3</sup>, it remains that the respective heights of both

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<sup>2</sup> Bruce §§4.6.1 and 4.8.1

<sup>3</sup> McKay in cross-examination by Warren

- the hotel and its plant room would be a storey higher than the existing office building even discounting its top floor set back. Taken together the jump in height between nearby buildings, at 30m or below, and the top of the proposed hotel plant enclosure at over 36m would be a significant increase amounting to a step change in heights. The increased would be particularly apparent when seen above the Foundry from the Blackfriars Road and in the degree to which the hotel would stand above the adjacent primary school when viewed from Webber Street and along Boyfield Road.
12. The proposed veil could be in a range of materials<sup>4</sup>, which could be controlled by conditions, but the suggestion was that it would be in the form of vertical terracotta battens which could to break up the appearance of an otherwise monolithic block and make it look more recessive. The Appellant's witness<sup>5</sup> was not able to identify examples of where upper floors had been successfully softened in this way. None of the illustrations of terracotta battens<sup>6</sup> were particularly intended to serve this purpose, indeed some were employed to articulate or enliven elevations rather than subdue them. On this point I find that, regardless of any proposed veil, the upper floors would appear monolithic and even assertive rather than subservient in the surrounding townscape. I am not persuaded that this, or any other veil or treatment, would overcome the harm that would be caused to the character and appearance of the area by the bulk of the new hotel, and by the top floors in particular.
  13. The scheme would improve the appearance of the Blackfriars Road façade and there would be functional improvements as well, albeit that those would be limited by what can be achieved to alter the access to the front of the building without radical structural alterations. The proposed new rooftop pergola to the existing office building would not only exceed the 30m height limit set by policy (see below) but, unlike the plant rooms, would do so on the frontage where it would be highly visible. On the other hand, subject to conditions controlling materials, details and planting, it could have a lightweight appearance which would go a long way towards mitigating its height.
  14. While the rear of the existing offices is not particularly attractive, at present the matching materials help it to blend into the main block along Blackfriars Road. The proposed hotel, with its change in treatment for the upper floors, would be likely to stand out in a more pronounced fashion. At street level, any positive contribution from the removal of an unsightly car park would be outweighed by the harmful impact of its replacement.
  15. While the front of the existing building is on Blackfriars Road, and Webber Street leads to Waterloo Station, to my mind the landmark on this corner is the Blackfriars Foundry, backed up by the existing office building. For the proposed hotel to amount to a landmark, it would need to become the most obvious building on the corner whereas it has apparently been designed to be subservient. None of the information provided to the Inquiry on the final materials to the upper storeys persuaded me that any external finish to the top floors could both attract the eye as a landmark and be subservient. On this point, I find that the design would fall between two stools and fail to be either an attractive landmark or a subtle and subservient addition. I acknowledge that the Appellant had persuaded the Council's officers to support the scheme as a

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<sup>4</sup> See CD A2: Design and Access Statement (DAS) pp68-72

<sup>5</sup> Murphy

<sup>6</sup> ID11. Provided only when prompted and after his evidence had been heard. He had not visited all the examples.

marked improvement on a 13 storey version, which was presented as a landmark<sup>7</sup>, but this does not make it acceptable.

16. The statutory development plan for the area comprises the Southwark Core Strategy 2011, Saved Policies of the Southwark Plan 2007 and the London Plan 2016. Of particular relevance, Saved Southwark Plan Policy 3.20 – *Tall Buildings*, which applies to all buildings taller than 30m, sets criteria all of which need to be met. These include ensuring that any tall building:
  - i) makes a positive contribution to the landscape; and
  - ii) is located at a point of landmark significance; and
  - iii) is of the highest architectural standard; and
  - iv) relates well to its surroundings, particularly at street level; and
  - v) contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
17. More up to date guidance is found in the Blackfriars Road Supplementary Planning Document (SPD) January 2014. Its SPD 5 *Building Heights* identifies *Tall buildings* as landmarks and refers to *Buildings of up to 30m along Blackfriars Road between Southwark tube station and St George's Circus*. For all buildings over 30m it adds criteria which reflect and expand on those in Saved Policy 3.20. While the SPD is no more than guidance, it reinforces this policy in a more up to date document. Although slightly less prescriptive with regard to heights, London Plan 7.7 - *Location and Design of Tall and Large Buildings* also reiterates and expands on these criteria.
18. The proposed hotel would be well above the 30m threshold in Policy 3.20 such that its criteria all apply. For the reasons set out above, I find that the scheme would conflict with most of these criteria. For similar reasons, it would be contrary to SPD 5 and conflict with London Plan Policy 7.7. It would fail to satisfy the requirements in Chapter 12 *Achieving well-designed places* in the National Planning Policy Framework (NPPF).

#### HERITAGE ASSETS

19. Blackfriars Foundry is considered a building of townscape merit (or a non-designated heritage asset in NPPF parlance). Its significance includes its architectural and historic interest and the extent to which it has survived. In particular, its ornate detailing and intricately decorated skyline, with a combination of gable, chimneys and finials, make it one of the more interesting buildings in the vicinity. The proposed hotel would stand behind and above the Foundry as does the existing office building. However, while the existing building has a single blank flank wall rising above the Foundry, subject to conditions, the hotel could add a rather more complicated external treatment in the immediate background. Consequently, even if the external treatment succeeded in making the hotel appear somewhat recessive, the more varied materials to the upper floors would cause harm to the setting of this heritage asset. Cumulatively with the existing building, whether plain or complicated, this harm would be significant. Given its lack of designation, the overall weight to this harm, and to the conflict with a raft of conservation policies, should be no more than moderate.
20. Albury House and Clandon House on Boyfield Street are Grade II listed. The proposed hotel would be visible in views along the street and so within their

<sup>7</sup> Bruce §4.2.4



settings. However, their significance is not dependent on an extensive setting, the hotel would be at some distance, and the existing offices are already visible in the settings. On this point I find no demonstrable harm or conflict with relevant preservation policies.

*Provision of visitor accommodation*

21. Saved Policy 1.12 *Hotels and visitor accommodation* encourages these in areas with high public transport accessibility but does not permit them where they would result in a loss of existing residential accommodation, or an over dominance of visitor provision in the locality. The reasons given are that visitor accommodation within Southwark contributes to local job opportunities and prosperity, as well as promoting Southwark as a tourist destination; it must be near public transport to reduce travel by private car, and be of greatest benefit to visitors. The reasons add that dominance by single uses such as hotel accommodation detracts from the vitality of an area and reduces the range of other services available to residents and visitors.
22. It was common ground that London Plan Policy 4.5Ab aims for 40,000 net additional hotel rooms by 2036; that the draft New London Plan does not set a target for additional serviced accommodation, but estimates<sup>8</sup> that London will need an additional 58,000 bedrooms of serviced accommodation by 2041; that there is an need for around 2,500 additional visitor accommodation rooms<sup>9</sup> in Southwark between 2007 and 2026; and that the latest draft New London Plan evidence base<sup>10</sup> states that the projected demand for Southwark is a net additional 1,795 visitor accommodation rooms between 2016-2041. The current number of bedrooms within Southwark is 5,802 which equates to a share of 4% of serviced accommodation room supply in London, which is the 7<sup>th</sup> highest in the capital<sup>11</sup>.
23. The agreed evidence<sup>12</sup> enumerates the existing visitor accommodation as well as the implemented, extant, and lapsed permissions, and the live applications in Southwark. The evidence<sup>13</sup> on the map of local hotels shows that these are concentrated around the back of Waterloo Station, which is in Lambeth, on the approaches to Blackfriars Bridge and Southwark Bridge, to the south of Tate Modern, and between Southwark Street and Union Street. Beyond these areas, there are only 4 hotels within half a mile of the appeal site, with further permissions for two new hotels and one extension. It was common ground that there are no hotels within 100m of the site, only one hotel within 200m and 6 hotels within 400m of the site.
24. I acknowledge that there must be a limit to hotel provision within an area before it starts to significantly alter that area's character and note that the adjoining Borough of Lambeth is putting measures in place. I accept that there is nothing in policy to indicate that compliance, or otherwise, or the definition of local, should be assessed by reference to clustering. I note that the targets for new accommodation for Southwark have already been met but this is not the same as demonstrating over-dominance. I also accept that the sense of the

<sup>8</sup> Supporting paragraph 6.10.2 to draft New London Plan Policy E10

<sup>9</sup> GLA's Hotel Demand Study (2006)

<sup>10</sup> Table 14, page 37, of the GLA Economics Working Paper 88: Projections of demand and supply for visitor accommodation in London to 2050 (GLA, 2017)

<sup>11</sup> Ibid p16

<sup>12</sup> SoCG addendum on hotel provision, Summary Table A, p3

<sup>13</sup> Table 5 and Map 2 of Ms Hills's evidence (as updated)

character of an area<sup>14</sup> can be a matter of perception, but the weight to be given to the evidence should be predominantly to factors which can be measured.

25. The maps of hotels and land use show a concentration of existing and projected accommodation towards the river, and near to connections to central London, but also highlight that the appeal site is within quite a different character area. Although relevant policy does not define what is the relevant locality, I find that a single additional hotel on the appeal site would not tip the balance for the nearby area such as to amount to a significant change in character for this locality. Both on its own, and in combination with other existing and permitted developments, the addition of one further hotel on the appeal site would not unduly compromise the balance of local land uses.
26. There is no scheme to demonstrate that the car park alone could be suitable for any significant amount of housing development and the owners have expressly ruled out redevelopment for housing. The existing office has been recently refurbished, and is unlikely to be redeveloped soon, so there is very little prospect of housing development on the site in the foreseeable future. While there could be conflict with the allocation in emerging policy NSP15 of the draft submission version of the New Southwark Plan 2017, which stipulates that development proposals for the wider site should include housing, as this is unlikely to happen, even over a 15 year timespan, and as the policy is far from adoption, this conflict should be given limited weight.
27. It follows that the scheme would not be contrary to Saved Policy 1.12 *Hotels and Visitor Accommodation* or to other relevant existing and emerging policies which generally support the provision of additional hotel rooms in both London as a whole and in Southwark in particular.

#### *Quality of visitor accommodation*

28. The proposal is for a low cost hotel and around 23% of the rooms would have no window. There is no policy excluding such accommodation and the Council's objection relied on general design policies. It is fair to say that a small, windowless room would not amount to a design that would provide a good standard of amenity for long term residents. However, the intention is that these rooms would be for short-term stays, that would spend more of their waking time in other areas of the hotel such as the sunny open spaces. Visitors just staying overnight in the winter months, or those sleeping in the daytime due to an overnight flight, might have no desire to look out of a window. Rooms would be air conditioned in any event. As discussed at the Inquiry, a condition could prevent residents staying for more than a few nights and so prevent the rooms being used for any lengthy stays.
29. For these reasons, I find that the size and lack of windows alone should not be a bar to this development and note that this was also a finding of a previous Inspector<sup>15</sup>, albeit for a scheme with a smaller proportion of windowless rooms. There would be no conflict with London Plan Policy 4.5C, which expects that LDFs should promote high quality design of new visitor accommodation.

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<sup>14</sup> Shah's evidence

<sup>15</sup> see CD D9 para 19

*Other matters*

30. One of the tenants of 160 Blackfriars Road was particularly concerned not only with the potential loss of an extremely pleasant view but also with overlooking. This concern was heightened by the nature of its business. However, my site visit showed that the areas that would be most easily overlooked are not currently in sensitive uses.
31. The nursery area for the adjacent Primary School lies very close to the boundary with the existing car park and would be affected by a loss of daylight and a reduction in sunlight. While these matters are not sufficient to outweigh the general benefits of a substantial development in a prime location, they nonetheless add slightly to the harm I have identified.

*Planning obligation and conditions*

32. The s106 obligations would include financial contributions to local and strategic transport, travel and other management plans; public realm works; employment, training and local procurement; and to an energy strategy. A single storey affordable workspace would also be secure by obligation. While these are important aspects of the scheme, in large part they would be mitigation to offset harms, or conflict with policies, that would otherwise arise and so should be given limited weight as benefits.

*Benefits*

33. Under the current development plan, as the site is within the CAZ and an Opportunity Area, the proposed hotel use would generally accord with London Plan Policy 4.5, which supports London's visitor economy; with Southwark's Core Strategy 2011 which, at Strategic Policy 10 - *Jobs and businesses* aims to protect tourism facilities and encourage new ones; it would accord with Saved Policy 1.12 - as above; and with the Blackfriars Road SPD which supports proposals for new hotels.
34. The scheme would have economic benefits, make better use of brownfield land, and make more efficient use of land in a highly sustainable location with a PTAL of 6b. These are significant benefits. An affordable workspace would be an additional benefit. There would be two new squares, at least one of which would enjoy significant levels of sunshine. On the other hand, as the public spaces are largely out of sight from the road, much of the benefit from these would be likely to be enjoyed by the new hotel customers and office users, that is to say by the occupiers of the site, rather more than by the wider public who would be less aware of their existence.
35. There would be improvements to the appearance of the façade as well as functional enhancements to the way that the ground floor operates. However, the new roof pergola would conflict with policy limiting the height of new development and access improvements would be limited by the structure. While both these are matters in favour of the appeal, for these reasons they should be given limited weight in the balance when considering the benefits.
36. I acknowledge the demonstrable quality of the architects' hotel work elsewhere but each application must be treated on its own merits.

*Overall planning balance*

37. For the above reasons, and having regard to all other matters raised, including overlooking, rat runs, potential loss of light, proximity to flats opposite, and drop-off traffic, I find that the harm to the character and appearance of the area as a result of the prominence of the new hotel, and its upper floor in particular, taken with the lesser harms to the setting of Blackfriars Foundry and other concerns, would outweigh the above benefits.
38. For these reasons, the scheme would be contrary to the development plan policies set out above and, on balance, with the development plan as a whole. The benefits do not amount to material considerations of such weight as to overcome this conflict and so, on balance, the appeal should be dismissed.

*David Nicholson*

INSPECTOR

**APPEARANCES**

## FOR THE LOCAL PLANNING AUTHORITY:

Stephanie Hall of Counsel	instructed by Southwark Council
She called	
Martin McKay MSc MRTPI BSc DipArch ARB	Southwark Council
Laura Hills BA MPlan MRTPI	Southwark Council
Andre Verster BA MTP	Southwark Council

## FOR THE APPELLANT:

Rupert Warren QC	instructed by DP9
He called	
Mark Bruce BA DipArch RIBA RIAS ARB	EPR Architects
Kevin Murphy BArch MUBC RIBA IHBC	K M Heritage
Oliver Sheppard BA Dip TP MRTPI	Director DP9

## INTERESTED PERSONS:

Sachin Shah	Local resident
Daniel Hyde	Freeths, solicitors
Cllr. Adele Morris	Local Counsellor
Miss Ramsey	Local resident

## INQUIRY DOCUMENTS (ID)

ID 1	Appellant's opening points
ID 2	SoCG Addendum (superseded)
ID 3	Summary proof of evidence from Laura Hills
ID 4	Opening submission for the Council
ID 5	Statement from Freeths solicitors
ID 6	List of suggested conditions
ID 7	Note from Miss Ramsey
ID 8	Southwark five and fifteen year housing land supply
ID 9	SoCG Addendum on hotel provision
ID 10	Note concerning hotel guestrooms without windows
ID 11	Note concerning terracotta battens
ID 12	Council's closing submissions
ID 13	Appellant's closing submissions
ID 14	Signed and dated s106 undertaking

## CORE DOCUMENTS (CD)

- CD A1 Planning application forms
- CD A2 Design and Access Statement
- CD A3 Planning Statement
- CD A4 Existing and Proposed Drawings
- CD A5 Heritage and Townscape Appraisal
- CD A6 Energy and Sustainability Statement
- CD A7 Transport Assessment
- CD A8 Travel Plan
- CD A9 Outline Construction Logistics Plan
- CD A10 Draft Operational Management Plan
- CD A11 Servicing Management Plan
- CD A12 Acoustic Report
- CD A13 Statement of Community Involvement
- CD A14 Basement Impact Assessment and Contamination
- CD A15 Daylight and Sunlight Report
- CD A16 Air Quality Assessment
- CD A17 Archaeology Assessment
- CD A18 Arboricultural Assessment
- CD A19 Flood Risk Assessment
- CD A20 Ecology Survey
- CD A21 Hotel Demand Analysis
- CD A22 Hotel Socio and Economic Impact Analysis
  
- CD B1 Officer's Committee Report
- CD B2 Decision Notice
- CD B3 GLA Stage I Report
- CD B4 GLA Stage II Report
- CD B5 Appellant Statement of Case
- CD B6 Council Statement of Case
- CD B7 Statement of Common Ground
- CD B8 Officer's Committee Report- Addendum
  
- CD C1 The National Planning Policy Framework (NPPF) 2019
- CD C2 Core Strategy (2011)
- CD C3 Saved Policies of the Southwark Plan (2007)
- CD C4 New Southwark Plan: Proposed Submission Version (2017)
- CD C5 The New Southwark Plan proposed Submission Version Amended Policies 2019
- CD C6 London Plan (2016)
- CD C7 Draft London Plan (extracts only)
- CD C8 Blackfriars Road SPD (2014)
- CD C9 Mayor's Central Activity Zone SPD (2016)
- CD C10 Planning Obligations and Community Infrastructure SPD
- CD C11 Historic England- Tall Buildings Advice Note 4 (2015)
  
- CD D1 Committee Report for 13/AP/3815- 235-241 Union Street
- CD D2 Committee Report for 16/AP/1660- Friars Bridge Court
- CD D3 Committee Report for 14/AP/1862- 128-150 Blackfriars Road
- CD D4 Committee Report for 17/AP/1959- 14-21 Rushworth Street
- CD D5 Committee Report for 18/AP/2670- 110 Peckham Road
- CD D6 Planning Statement for 18/AP/2670- 110 Peckham Road
- CD D7 Committee Report for 17/AP/4042- Former Lesoco Campus, Ufford Street
- CD D8 Quick Parking Car Park, 112A Great Russell Street, London
- CD D9 Denmark Hill Neighbourhood Housing Office, 161 Denmark Hill, London  
Ref: APP/A5840/W/18/3206258

**Engagement Summary for the Development Consultation Charter (validation requirement)****Site: Car park at rear of 160 Blackfriars Road/'Friars House' office building****Address: 160 Blackfriars Road, London SE1 8EZ****Application reference: 20/AP/0556****List of meetings**

<b>Meetings</b>	<b>Date</b>	<b>Attendees</b>	<b>Summary of discussions</b>
Pre-application meeting 1 (previous planning application)	March 2017	Council officers Endurance Land DP9 EPR	Principle of development. Existing site and extent of application boundary Massing principles. Emerging Site Allocation
Pre-application meeting 2 (previous planning application)	May 2017	Council officers Endurance Land DP9 EPR	Reduced height. Revised design-introduction of a veil
Pre-application meeting 3 (previous planning application)	October 2017	Council officers Endurance Land DP9 EPR	Reduced height. Townscape views Introduction of Friars Yard public realm
Pre-application meeting 4 (previous planning application)	December 2017	Council officers Endurance Land DP9 EPR	Design amendments Affordable workspace
Pre-application meeting 5 (previous planning application)	March 2018	Council officers Endurance Land DP9 EPR	Materiality/ elevations/ approach to veil
Pre-application meeting 6 (new planning application)	November 2019	Council officers Endurance Land Angelo Gordon DP9 EPR	Appeal decision and feedback. Inspector's comments on land use. Revised height/ massing/ design Approach to consultation.

## List of public consultation events carried out to date or planned:

Public consultation events	Date	Attendees	Summary of feedback
Public exhibition	15.01.20 & 18.01.20	37 – including local residents, representatives of community groups and one ward councillor (Cllr David Noakes)	<p>Responses suggest that local residents broadly acknowledge the changes made to the proposals to address feedback received for the previous application and are broadly supportive of the provision of new affordable workspace/community space, as well as the landscaping and public realm improvements that will form part of the proposed mixed-use development.</p> <p><i>Further details of feedback are outlined in the Statement of Community Involvement</i></p>



**Refer to checklist in the development consultation charter for pre-application consultation requirements dependent on the scale of the proposed development.**

**Evidence of consideration of the following (this list is not exhaustive):**

**Demographic context:**

- Who occupies the site?

The site is currently occupied by an underused car park that services the office building on 160 Blackfriars Road, also known as 'Friars House'. There is a row of retail units on the ground floor of the 160 Blackfriars building.

- Will they need to be relocated? On what basis? Will they be expected to return?

The office units will be unaffected by the proposals and the existing car park is under-utilised. All but one of the retail units on the ground floor of 160 Blackfriars Road will remain, with the owners of the unit to be removed already planning to move out.

- Due regard to how the development might impact people differently depending on their race, age, gender reassignment, disability, sexual orientation, religion or belief, or sex.

The community/affordable workspace provided as part of the development will seek to cater to the needs of people in the local area.

The development will provide much-needed affordable community/workspace to local people, thereby contributing to an improvement in local equality of opportunity. The diversity of the area was reflected in the makeup of the exhibition attendees.

- How the development fosters good relations between different groups in the community.

By providing ground floor affordable community/workspace that will be accessible to and usable by local residents, the development will provide an opportunity to bring different groups in the area together. Engagement with the community will continue, with the aim being to ensure that the benefits of the new space are maximised.

- Are there neighbours in close proximity?

The nearest residential neighbours of the site live in Globe View House, to the north; and Sharpley Court, to the east. Several attendees of the exhibition – some of whom had engaged with the previous application for the development of the site – came from these properties and engaged in detailed conversations with the project team.

In addition, Friars Primary School is located directly adjacent to the car park site – the School has been kept updated with information on the consultation and the proposals and has been offered meetings with and detailed briefings from the project team.

**Cultural setting:**

- Is the site in a Conservation Area?

The site does not itself lie within a Conservation Area but is close to the borders of three such areas, including Valentine Place (50 metres to the west); King's Bench (120 metres to the east); and St George's Circus (200 metres to the south). Additionally, nearby Grade II Listed buildings include Albury

House and Clandon House on Boyfield Street; the Peabody Estate on Blackfriars Road; Ripley House on the Rushworth Street Estate; and the former Sons of Temperance Friendly Society Building, at 179 Blackfriars Road.

- Is the building listed?

160 Blackfriars Road is not listed; the proposed development site is the car park to the rear.

- Is the site/building a place of community interest?

The existing car park on the site is underused by the office tenants of 160 Blackfriars Road, is not currently accessible to the public and is therefore not of community interest.

### Highways:

- How is the site accessed?

The site is presently accessed by a single set of gates on Pocock Street, designed for vehicular entry and exit.

- Will there be an increase in traffic during construction and once the new development is completed?

In line with Southwark and emerging London-wide policy, this development will significantly reduce the number of car parking spaces on site; we expect users to take advantage of good local public transport links. The hotel will discourage local coach activity by promoting these methods of transport.

The Transport Assessment, which forms part of this planning application, sets out detailed assessments of the projected impact of the development on the local transport network. It has found that there is unlikely to be an increase in the number of vehicle trips to the site such that there would be a noticeable impact on the highway.

A Construction Management Plan will be agreed with LB Southwark, aiming to minimise any disruption relating to construction traffic etc. In addition, a servicing plan will be agreed with the Council, which will also aim to minimise disruption once the building is operational.

### Other engagement:

#### Letters and flyers

- Introductory letters were sent to local stakeholder groups and politicians in January 2020, advertising the public exhibition and offering meetings and detailed briefings on the proposals.
- **4,217** flyers sent to local residents and businesses in January 2020, inviting them to the public exhibition.

#### Wider publicity

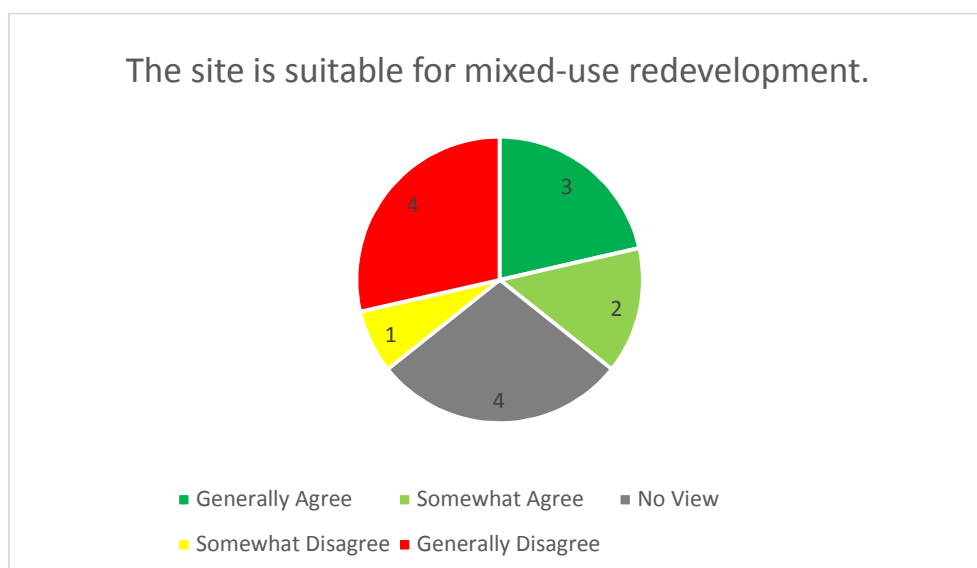
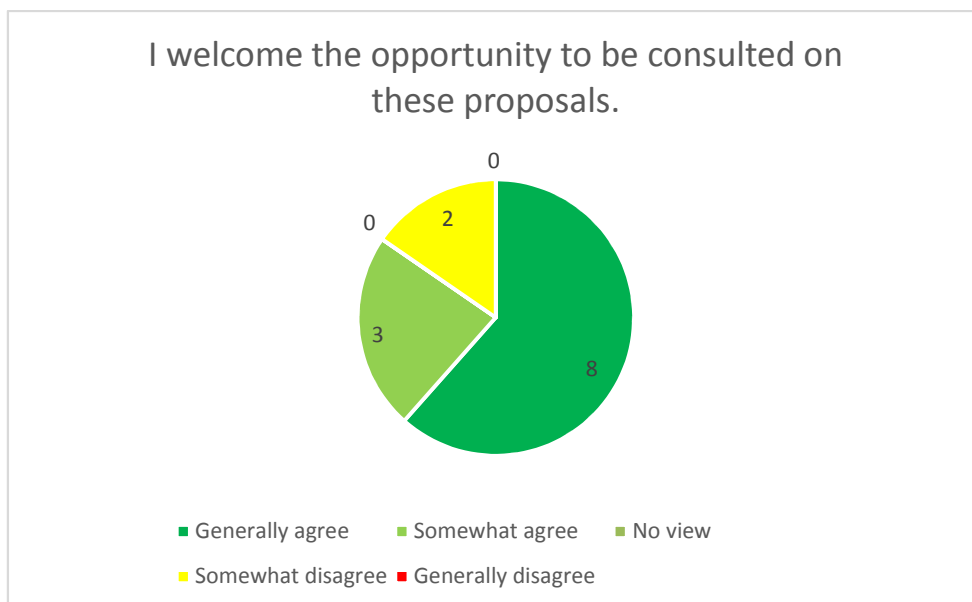
- A dedicated project website was launched ahead of the public exhibition, containing event details and further information about the proposals.
- Notices were published in *Southwark News* and on the 'London SE1' blog, advertising the public exhibition

### Ways to submit feedback responses included:

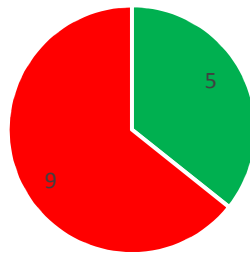
- Feedback forms submitted at the public exhibition
- Feedback forms returned via post or email subsequent to the public exhibition
- An interactive board, inviting residents to vote and provide further suggestions for proposed uses of the ground floor affordable community/workspace
- A dedicated project email inbox
- Telephone number manned during office hours

### Public consultation feedback summary

The quantitative feedback collected via the feedback forms is displayed below – as can be seen from the results displayed in the charts, the majority of attendees were supportive of the provision of new affordable workspace/community space, as well as the landscaping and public realm improvements that will form part of the proposed mixed-use development.

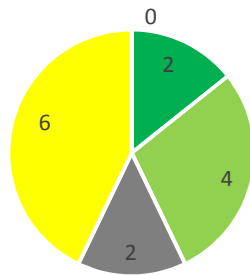


I engaged with consultation activities for the previous application.



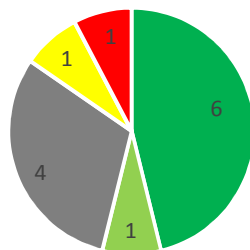
■ Yes ■ No

The revised proposals have responded to feedback on the previous planning application.



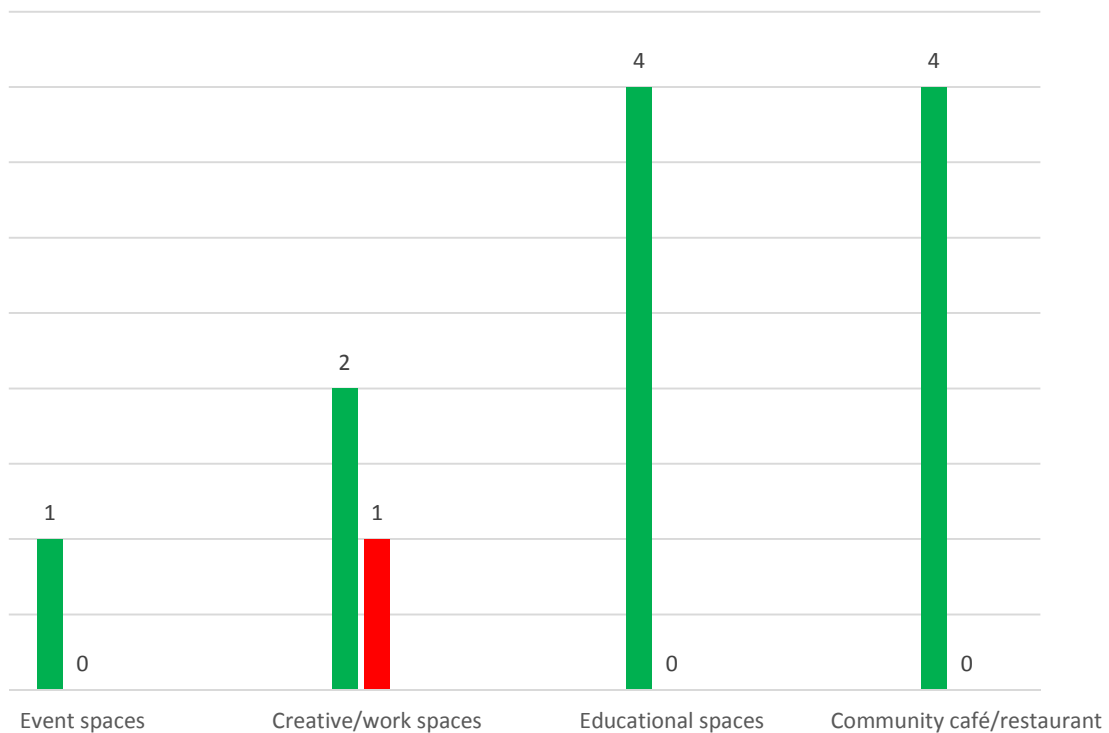
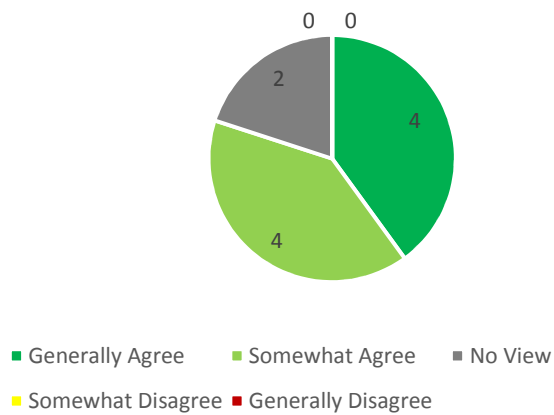
■ Generally Agree ■ Somewhat Agree ■ No View  
 ■ Somewhat Disagree ■ Generally Disagree

I support the provision of affordable workspace in these proposals.



■ Generally Agree ■ Somewhat Agree ■ No View  
 ■ Somewhat Disagree ■ Generally Disagree

I support the proposed landscaping and public realm improvements, including the provision of a new publicly-accessible courtyard.



### Public consultation qualitative feedback

The below qualitative feedback is drawn both from verbal and written comments received at the public exhibition.

#### Noise and disruption

Attendees broadly acknowledged that the proposals had responded to feedback from the Planning Inspectorate regarding the scale and visual profile of the development, by reducing the height and

altering the materiality of the façade. Some residents – particularly near neighbours of the site e.g. from Globe View House – nevertheless expressed the belief that the proposals could/should have gone further in terms of height reduction and sought further clarity on the impacts on their properties in terms of daylight/sunlight impacts etc.

### **Land use**

While most attendees accepted that the Planning Inspectorate had ruled in favour of the proposed land use during the appeal process for the previous application and that a mixed-use development on the site could deliver a number of benefits, there were nonetheless concerns from some residents about the proposal for a hotel on the site, echoing some of the arguments about oversaturation of provision associated with the previous application.

These residents pointed to the fact that the number of hotels in the area had increased significantly over the last 15-20 years and queried the need for additional visitor accommodation, as well as seeking clarity on the type of hotel being proposed. Some suggested that the site would be more suitable for a development wholly-devoted to office space/affordable workspace, while others favoured a residential development.

### **Transport and servicing**

The proposal to remove the existing car park on the site was broadly welcomed by attendees, who accepted that it was under-utilised and that the site enjoyed excellent public transport links. However, a number of attendees raised questions about the impact of the development on the local road network. In particular, there were concerns about the proposed servicing arrangements for the hotel, with a few residents suggesting that the existing servicing yard on Pocock Street was either inadequate for the task or that its use would lead to further disruption for residents on that street and nearby.

Some residents' concerns went beyond the immediate proposals and constituted a broader critique of the road network in the vicinity e.g. one-way systems; a consequent lack of traffic management; and the potential impact of these on the safety of cyclists etc. The project team noted these concerns and offered to follow up on these discussions and examine ways to provide further reassurance on transport and servicing arrangements as part of the planning application process.

### **Public realm and landscaping improvements**

The proposed improvements to the public realm and landscaping – such as the portal entrance and the publicly-accessible courtyard – were largely welcomed by attendees. They noted that the new open space could ease pressure on other areas nearby and suggested that it could be used by the community.

### **Community/affordable workspace**

The proposal for ground floor community/affordable workspace was broadly supported by attendees, a number of whom engaged with the interactive exercise on the topic during the exhibition. Some residents indicated that there was a shortage of community space in the area and all were keen to ensure that the proposed space would be genuinely affordable (a few had expressed concerns about further 'gentrification' of the area) and would be managed so as to maximise benefits for the local community, for instance by contributing to local charity/educational provision.

**Summary of how the relevant Social Regeneration Charter, Place Action Plan and Community Investment Plan have been considered.**

The Bankside, Borough and London Bridge Area was designated as an Opportunity Area under the London Plan 2015; the site is located within this area. This allocation is indicative of the growth in the area and the Greater London Assembly and Mayor of London would like to see 25,000 jobs and a minimum of 1,900 new homes in the area.

In line with this overarching ambition, the proposed development is forecast to create between 75 and 98 jobs available to local people and contribute to the growth of the area more widely. The independent Planning Inspector has previously found that the proposed land use is acceptable for the site.

**Provide examples of all consultation materials – see SCI appendices**

The **engagement summary** will be a validation requirement for any planning application. It should clearly set out how the feedback received has been addressed and how the community has shaped the proposed development. Where comments have not been addressed, this should be detailed and justified. This will be used to inform officer and committee reports.

**OPEN****MUNICIPAL YEAR 2020-21****COMMITTEE:****PLANNING COMMITTEE****NOTE:**

Original held in Constitutional Team; all amendments/queries to Tim Murtagh/Gerald Gohler, Constitutional Team, Tel: 020 7525 7187/7420

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