

Item No.	Classification:	Date:	Meeting Name:
6.1	OPEN	3 September 2013	Planning Committee
Report title:	Development Management planning application: Application 13/AP/0966 for: Full Planning Permission Address: 169-173 BLACKFRIARS ROAD (BOUNDED BY SURREY ROW AND POCOCK STREET), LONDON SE1 8ER Proposal: Demolition of existing buildings and structures followed by the erection of a part 10 storey / part 6 storey building comprising 87 residential units, five retail/commercial units totaling 451 sqm (Use Classes A1-A5 and D1), a reception area, ancillary cycle and disabled car parking, private and public amenity space, basement and ancillary plant		
Ward(s) or groups affected:	Cathedrals		
From:	Head of Development Management		
Application Start Date 18/04/2013		Application Expiry Date 08/08/2013	
Earliest Decision Date 06/06/2013			

RECOMMENDATION

- 1 It is recommended that planning permission be refused for the following reason:

The affordable housing proposed does not meet the minimum policy requirement of 35% and the Council considers that the viability information provided with the application does not demonstrate that as much affordable housing has been proposed as is financially viable for this development. The application is therefore contrary to Strategic Policy 6 (Homes for people of different incomes) of the Southwark Core Strategy 2011 and Policy 3.12 (Negotiating affordable housing on individual private residential and mixed use schemes) of the London Plan 2011.

BACKGROUND INFORMATION

Site location and description

- 2 The site, measuring 0.17 hectares is located on the eastern side of Blackfriars Road between Surrey Row and Pocock Street. The existing buildings on the site comprise a five storey 'mansion flats' (St Georges Mansions) building fronting Blackfriars Road and Pocock Street (Nos. 169-173) comprising retail and café units at ground floor level with residential above (currently vacant), and a part two/part three storey public house building (No.173) on the corner of Blackfriars Road and Surrey Row. To the rear of these buildings are 45 domestic garages accessed via Pocock Street.
- 3 To the north of the site, on the opposite side of Surrey Road, is a twelve storey residential building (Helen Gladstone House) and adjacent garden area. A part four/part five storey residential building (Pakeman House) is located adjacent to the rear boundary. To the south, fronting onto the opposite side of Pocock Street, is an

eight storey building comprising student flats (Manna Ash House) and a seven storey office building fronting onto Blackfriars Road.

- 4 The site is located in a sustainable and accessible location (PTAL 6b - excellent) within walking distance of Southwark underground, Waterloo station and bus stops serving several bus routes. It is within the Central Activities Zone, the Bankside, Borough and London Bridge Opportunity Area and the Bankside and Borough District Town Centre.

Details of proposal

- 5 The application proposes the demolition of the existing buildings and a replacement part 10 storey/part 6 storey building, plus basement, comprising 87 residential units, five commercial units (A1-A5, and D1) amounting to 451 sqm of floorspace, along with ancillary amenity space, disabled car parking, cycle parking and landscaping. The 10 storey element will front onto Blackfriars Road with the six storey element at the rear facing onto both Surrey Row and Pocock Street.
- 6 The mix of residential units is set out below:

Unit Type	Number of Units	Percentage (%)
Studio	3	3
1 Bed	22	25
2 Bed	44	51
3 Bed	18	21
Total	87	100

The proposed residential density amounts to 1,476 habitable rooms per hectare.

- 7 The affordable housing proposed within the scheme amounts to 20% of habitable rooms, comprising a 71%/29% split between social rent and shared ownership. A viability assessment has been submitted with the application seeking to demonstrate that as much affordable housing has been proposed as is financially viable.
- 8 Ten of the proposed residential units are designed for wheelchair units (seven private units and three affordable units). Eight disabled parking spaces are proposed at ground floor level, accessed from Pocock Street with exit onto Surrey Row. A communal garden is proposed on the roof of the seven storey building and further shared amenity space would be located in front of the development adjacent to Surrey Row.
- 9 During the course of consideration of the application revised drawings have been submitted by the applicant incorporating the following amendments:
 - Reduction in the height of the part of the building fronting Surrey Row and Pocock Street from seven to six storeys (approximately 2.8 metres);
 - Alterations to the detailed design of the elevations;
 - Alterations to the internal layout of the scheme including a reduction of seven residential units.

Planning history

- 10 In 2011 a planning application was submitted but subsequently withdrawn for the demolition of 173 Blackfriars Road (the public house) and a replacement seven storey building comprising new restaurant/bar and nine flats above. In 2008 an application

for a Certificate of Lawful Use for use of St Georges Mansions as a residential hostel was refused. There have been several other planning applications but none are relevant to the current proposals.

Planning history of adjoining sites

- 11 Detailed planning permission (12/AP/3558) has recently been granted at 90-92 Blackfriars Road (the other side of Blackfriars Road to the current proposal) for the demolition of the existing buildings and the erection of a five to eight storey building (plus basement) comprising 53 residential units (21% of which is affordable), 633 sqm of retail floorspace and 767 sqm of office floorspace.
- 12 Planning permission was granted in 2010 and has been recently implemented for a maximum seven storey building comprising retail use at ground floor level with offices above at 102-107 Blackfriars Road, approximately 50 metres to the south of the application site.
- 13 Planning permission has also been granted for a residential scheme further along Pocock Street to the east of the site.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

- 14 The main issues to be considered in respect of this application are:
 - a) The demolition of the existing buildings, including their townscape contribution and the role of the public house as a community asset.
 - b) The acceptability in principle of the proposed uses within the replacement building including their role in replacing the commercial floorspace lost through demolition.
 - c) The design and appearance of the building including how it relates to existing development in Blackfriars Road and the surrounding locality.
 - d) Impact upon the setting of the adjacent conservation area and listed buildings.
 - e) The acceptability of the proposed housing mix and quality of accommodation provided within the development.
 - f) The impact on the living conditions of neighbouring residential properties.
 - g) The provision of affordable housing within the scheme.
 - h) Transportation impacts.
 - i) Energy and sustainability.
 - j) Planning obligations.

Planning policy

- 15 National Planning Policy Framework (NPPF)

The NPPF came into effect on 27 March 2012 and is a material planning consideration. In relation to this application the most relevant sections are:

- 1 Building a strong competitive economy
- 2 Ensuring the vitality of town centres
- 4 Promoting sustainable development
- 6 Delivering a wide choice of good quality homes
- 7 Requiring good design
- 8 Promoting healthy communities
- 11 Conserving and enhancing the natural environment
- 12 Conserving and enhancing the historic environment

16 London Plan 2011

- Policy 2.9 Inner London
- 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 2.15 Town Centres
- Policy 3.3 Increasing Housing Supply
- Policy 3.4 Optimising Housing Potential
- Policy 3.5 Quality and Design of Housing Developments
- Policy 3.6 Children and Young People's Play and Informal Recreation Facilities
- Policy 3.7 Large Residential Developments
- Policy 3.8 Housing Choice
- Policy 3.9 Mixed And Balanced Communities
- Policy 3.11 Affordable Housing Targets
- Policy 3.12 Negotiating Affordable Housing On Individual Private Residential And Mixed Use Schemes
- Policy 4.7 Retail and Town Centre Development
- Policy 4.8 Supporting a Successful and Diverse Retail Sector
- Policy 4.9 Small Shops
- 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 5.5 Decentralised Energy Networks
- Policy 5.6 Decentralised Energy In Development Proposals
- Policy 5.7 Renewable Energy
- Policy 5.8 Innovative Energy Technologies
- 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 Wastewater Infrastructure
- Policy 5.15 Water Use And Supplies
- Policy 6.3 Assessing Effects of Development on Transport Capacity
- Policy 6.9 Cycling
- Policy 6.10 Walking
- Policy 6.13 Parking
- Policy 7.1 Building London's Neighbourhoods And Communities
- 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 7.13 Safety, Security And Resilience To Emergency
- Policy 7.14 Improving Air Quality

Policy 7.15 Reducing Noise And Enhancing Soundscapes
Policy 7.19 Biodiversity and Access to Nature
Policy 7.21 Trees and Woodlands
Policy 8.2 Planning obligations
Policy 8.3 Community Infrastructure Levy

17 Core Strategy 2011

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 5 - Providing new homes
Strategic Policy 6 - Homes for people on different incomes
Strategic Policy 7 - Family homes
Strategic Policy 10 - Jobs and business
Strategic Policy 11 - Open spaces and wildlife
Strategic Policy 12 - Design and conservation
Strategic Policy 13 - High environmental standards

18 Southwark Plan 2007 (July) - saved policies

Policy 1.1 Access to Employment Opportunities
Policy 1.4 Employment Sites outside the preferred office locations.
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 3.22 Important local views
Policy 3.28 Biodiversity
Policy 4.2 Quality of residential accommodation
Policy 4.3 Mix of dwellings
Policy 4.4 Affordable housing
Policy 4.5 Wheelchair affordable housing
Policy 5.1 Locating developments
Policy 5.2 Transport impacts
Policy 5.3 Walking and cycling
Policy 5.4 Public transport improvements
Policy 5.6 Car parking
Policy 5.7 Parking standards for disabled people and the mobility impaired

19 The Council's cabinet on 19th March 2013, as required by paragraph 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the

NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

- 20 The Council published for consultation the draft Blackfriars Road SPD in June 2013. Consultation is open on the Draft SPD until 12 September 2013. This documents is still subject to consultation and at an early stage of preparation and therefore it only carries limited weight in the determination of this application.

Principle of development

Loss of the Existing Buildings – Townscape

- 21 The proposal includes the demolition of both frontage buildings along with the single storey garages to the rear. Objections have been made to the loss of the two frontage buildings by the Georgian and Victoria Societies and by several local residents, due to their character and the positive contribution they make to the character of the streetscape. Neither of these buildings are listed and they are not located with a conservation area.

The applicant has commissioned for the application two separate heritage assessments of the two frontage buildings.

- 22 The assessment by Nathaniel Litchfield and Partners concludes that 169-171 Blackfriars Road (St George's Mansions) is not a particularly good example of turn of the century mansion blocks and has very low value of heritage significance. 173 Blackfriars Road (Imbibe Public House), which has been much altered and extended, is concluded to have low heritage value. The assessment goes on to state that the loss of these buildings would give rise to a minor adverse heritage impact and that, in accordance with NPPF (paragraph 135), the scale of harm and effect on significance should be weighed in the planning balance against the moderate beneficial aspects of the scheme including the enhancements of views out of the conservation area arising from the redevelopment of the garage site.
- 23 The additional heritage assessment carried out by CGMS concludes that the frontage buildings are modest buildings of their type and period, exhibiting little evidence of architectural embellishment or innovation that distinguishes them. It goes on to state that they retain some degree of historic interest for their illustrative value as part of a much altered historic streetscape, and as modest examples of their respective periods, these buildings make only a limited contribution to the character and appearance of the highly varied streetscape of Blackfriars Road, Surrey Row and Pocock Street and may be replaced with a high quality new scheme for the site, which would sit well within the existing varied townscape.
- 24 Paragraph 135 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 25 Officers consider that both existing buildings have some architectural merit and make a positive contribution to the character and appearance of the streetscene in Blackfriars Road. It is also recognised that the retention of older buildings, where appropriate, can make a positive contribution to the streetscape alongside more contemporary buildings. However, both the buildings have undergone significant alteration and neither is considered to have the quality to justify being listed. The

historic maps show that a public house has been located on the corner with Surrey Row as early as 1873; however, the current building is much altered both internally and to the rear and retains little interest beyond the facade onto the Blackfriars Road. St Georges Mansions has also been altered, particularly the ground floor shop fronts and at the rear of the site, and whilst being an attractive building in the streetscape, the conclusions of the applicant's heritage assessment are agreed in that it is not a particularly good example of the typical mansion block, lacking the elevation interest of other such buildings.

- 26 In conclusion on this issue, whilst the existing buildings have some limited merit, they are not particularly good examples of their type and it is considered their loss could be justified provided the replacement buildings are of a suitably high design quality to outweigh the limited harm that would result from the demolition of the existing buildings. This is considered in more detail in the section on *Design Issues* below.

Loss of Existing Buildings - Community and Other Uses

- 27 The demolition of 173 Blackfriars Road would result in the loss of the public house building which as pub and restaurant provides a local service and facility for the local community and other users. There are several other public house and restaurants in the vicinity of the site and the applicant proposes to provide a replacement A4 facility (drinking establishment) within the new development which can be secured via a planning condition. No objections are therefore raised to the loss of the public house A4 use.
- 28 In total the proposed replacement buildings comprise 454 sqm of replacement commercial facilities split between five units for use as A1-A5 and D1 (community) uses. This overall provision will allow flexibility for new uses at ground floor level, providing vitality to this part of Blackfriars Road, and compensates for the loss of the existing retail and other uses within the existing buildings.

Acceptability in Principle of the Proposed Uses

- 29 At a sustainable location within the Central Activities Zone, the Bankside and Borough Town Centre and Opportunity Area, the principle of a mixed use development comprising residential, retail and community facilities is considered to be acceptable. The 'retail' uses should allow scope for a range of A Class uses in order to provide a mixed and diversified range of facilities and should be at least equivalent to the floor area of those existing on the site.
- 30 The residential density of the scheme (1,476 hrph) exceeds the recommended acceptable range for the Central Activities Zone (650 to 1100 hrph). The application therefore needs to demonstrate that the proposed development achieves an exemplary standard of design, exceeding the residential design standards set out in the SPD.

Environmental impact assessment

- 31 A Screening Opinion has previously been issued by the Council confirming that the proposed development does not require the submission of an Environmental Statement (ES). Whilst an ES is not required, the application includes a number of reports assessing the impacts of the proposals upon the surrounding area.

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

- 32 The application site is adjacent to existing residential properties on Surrey Row

(including Helen Gladstone House (12 storeys) to the north and Pakeman House (five storeys) immediately to the east). Manna Ash, an eight storey building comprising student accommodation, is located to the south on the opposite side of Pocock Street

- 33 Helen Gladstone House is located close to the pavement edge on Surrey Row and is orientated so that its front elevation directly faces the application site. At the closest point there will be 17 metres between the two buildings. The proposed development has the potential to impact upon the occupiers of this building, particularly those flats on the lower floors which have principal windows directly facing the proposed building. These are small one bedroom flats whose primary outlook will be onto the new building.
- 34 During the consideration of the application, concerns have been raised by officers and local residents at the impact of the proposed building in terms of both the levels of day/sun light reaching the lower flats within Helen Gladstone House and the overbearing impact and oppressive sense of enclosure that would result for existing residents from the new building. Whilst the daylight and sunlight reaching these flats is already affected to some extent by the balconies of the flats above, the proposed building would result in a significantly greater impact upon the occupiers living conditions. Though recognising the urban context of the proposals and the impact of the existing balconies, the figures in the applicants Daylight and Sunlight Report delineate these concerns.
- 35 As a result of these concerns the applicant has submitted revised drawings removing one storey from the whole rear section of the building fronting Surrey Row and Pocock Street. This has resulted in a reduction in the height of this section of the building by approximately 2.8m, from 20.75m to 17.95m. The height of the front section of the building adjacent to Blackfriars Road remains at 29.9m, this part of the building not having as significant an impact upon the residents of Helen Gladstone House.
- 36 Whilst the reduced six storey section of building facing Helen Gladstone House would still retain a dominant presence, on balance, it is considered that it would not result in a significantly detrimental impact upon the living conditions of the adjacent residents in Helen Gladstone House. The reduction in height of the building will also serve to alleviate impacts upon day light and overbearing impact for the adjacent student accommodation building (Manna Ash House).
- 37 The proposals would also result in the potential for windows, balconies and communal amenity areas to overlook the facing windows and balconies in Helen Gladstone House. However, taking account of the minimum separation distance of 17 metres between the respective buildings, and the urban context of the proposals, it is not considered that there would be significantly detrimental impacts in terms of overlooking and privacy.
- 38 Given the orientation and separation distances involved, it is not considered that the proposals would result in any significant impacts upon the living conditions of other residential buildings in the vicinity of the site. Objections have also been received from the Estate Management Office (City of London Corporation) of Pakeman House, principally in relation to the impacts upon the living conditions of this neighbouring building to the east of the application site and the impacts of the proposal upon the redevelopment potential of the Pakeman House site. There are no facing windows in the flank elevation of this neighbouring building and, whilst there is likely to be a degree of indirect views into adjacent flats and balconies these would not be significant. There are no current proposals for the redevelopment of Pakeman House and it is not considered that the layout, design and scale of the proposed scheme is such to jeopardise or hinder the future development of the adjacent site.

- 39 The proposed building would also result in some overshadowing and loss of sun light to the communal external amenity areas on the corner of Blackfriars Road and Surrey Row. The applicant's sun light testing has concluded that 50% of this area would receive 2 hours of sunlight and it is concluded, taking into account the regeneration benefits of the scheme, this impact would not be so significant to justify the refusal of the scheme on this basis. Similarly, the impacts on other communal external amenity areas around the site is not considered to be significant.

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

- 40 There are no adjacent or nearby land uses which are expected to have significant impacts upon the incoming residents of the proposed development.

Design issues

- 41 The NPPF stresses the importance of good design and states in paragraph 56 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"*. 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 3.13 asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.
- 42 The proposal is arranged on the site in the form of a 'T' with a block fronting onto the Blackfriars Road and an attached block extending east along Pocock Street. This arrangement reflects the urban form of its main frontages which generally have buildings rising from the rear edge of the pavement. The arrangement also sets the building back to the southern edge of the site to allow the creation of a small landscaped area which echoes the 'pocket park' immediately to the north on Surrey Row and establishes a more generous public realm on this narrow street. This arrangement is a sound response to the site and preserves the urban character of the area.
- 43 The proposal, as amended, ranges in height between ten storeys on the Blackfriars Road and six storeys on Pocock Street / Surrey Row. The proposal is clad in brickwork generally to reflect the character of the area with the changes in scale carefully articulated by lighter glass and metal structures at prominent corners. The building facing the Blackfriars Road is set at ten storeys (29.9m) in height and is characterised by a strong grid of brick with large windows which take on a mansion block character addressing the principal frontage onto the boulevard. The design has a strong base which extends across the lower two floors with double-height pilasters and a generous active frontage which extends back along Pocock Street and includes a set-back colonnaded frontage on Surrey Row. Special attention has been paid to the corners with prominent wrap-around windows on the northern corner at the junction with Surrey Row. On the southern edge at the junction with Pocock Street the change in scale is articulated by a lightweight block that reaches from Blackfriars Road back along Pocock Street.
- 44 In this sensitive context the views of the development are important considerations. The views of the proposal submitted with the application demonstrate that the development does not intrude into the views of the neighbouring conservation areas. Indeed, by reflecting the draft Blackfriars Road SPD height on the Blackfriars Road and reducing in height and massing onto Pocock Street / Surrey Row the proposal

responds sensitively to its immediate and its historic context. This analysis is consistent with the findings of the draft SPD which encourages development that will reinforce the boulevard character of the Blackfriars Road and respect the prominence of local landmarks like the Palaestra building nearby.

- 45 Saved policy 3.12 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.*” This is particularly important on this case in, bearing in mind the loss of existing buildings and the potential for the development to impact upon the setting of conservation areas and listed buildings. The proposal is divided into two parts, the mansion block fronting onto the Blackfriars Road and the long low building onto Pocock Street / Surrey Row. Both parts are clad in a brick to reflect the character of the area however, each is treated differently. The mansion-type block is clad in a darker grey brick with deep window reveals and a strong geometric form. On Pocock Street / Surrey Row the chosen brick is lighter and the design takes on the character of a stacked terrace with split-level dual aspect apartments accessed from a central corridor.
- 46 In its geometry the design employs a civic order for the main road frontage onto the Blackfriars Road. Here the base, middle and top of the building have given the scheme a clear horizontal definition with coupled windows and balconies to give it stature. Vertically, the design is split into three bays to reflect the finer grain of the original Blackfriars Road townscape and at the corner with Pocock Street a glazed cantilevered block steps down to express the corner and mediate between the civic scale of the Blackfriars Road and the lower scale of Pocock Street. This corner feature is deliberately transparent with projecting metal fins to contrast against the solidity of the main facade to give the development a striking layered appearance in the approach from St George’s Circus.
- 47 The council’s Design Review Panel reviewed an earlier version of the design and a taller option in January 2013. The Panel welcomed the comprehensive re-development of the site but did not endorse the taller proposal. It encouraged the designers to develop this early version of lower proposal and to improve its architectural expression especially on Blackfriars Road and Pocock Street, to enhance the public realm especially in relation to the pocket park on Surrey Row and to address the fragmented massing of the earlier scheme. As a consequence the current proposal has been developed with a far stronger civic design for the Blackfriars Road frontage. The massing of the submitted scheme was articulated and a glass and metal block introduced at the corner to mediate between the Blackfriars Road block and the lower wing on Pocock Street. Finally, the public realm on Surrey Row was significantly enhanced with the introduction of a colonnade and a greater emphasis on well designed and generous entrance halls and more active frontages on the Surrey Row and Pocock Street frontages.
- 48 In conclusion, the proposal is a high quality architectural design and urban design which responds to its urban and historic context and reinforces them without being overly dominant. The mix of uses and the arrangement of height scale and massing are appropriate and the views demonstrate that the development will be a meaningful addition to the Blackfriars Road area.

Impact on character and setting of listed buildings and conservation areas

- 49 Saved policy 3.18 echoes the requirement in the NPPF which requires development to conserve or enhance the historic environment (section 12) including its setting. Saved policy 3.18 defines this and requires development to preserve or enhance among other things, “*the setting of a conservation area; or views into or out of a conservation*

area". The nearest listed buildings are located at 44-47 Nelson Square and have their back gardens on Surrey Row. The proposal does not affect the significance or the setting of these heritage assets whose main aspect is to the north. On Blackfriars Road the nearest listed buildings include the Peabody Buildings to the south near St George's Circus and to the north at 85 and 85 Blackfriars Road. Both are located well away from the site on the opposite side of the street and their settings are unaffected by this proposal.

50 No significant impacts are concluded to result upon the setting of the conservation areas or nearby listed buildings.

51 Impact on trees and proposed landscaping

There are no existing trees of significant amenity value that would be affected by the application proposals. Landscaping measures are included in the application details providing an appropriate landscaped setting for the building, additional details of which can be secured through a planning condition.

Layout and quality of residential accommodation

52 The general mix of proposed residential accommodation complies with the Residential Design SPD guidance. All the proposed flats at least meet, and in the majority of cases exceed, the minimum dwelling and room size standards. The two and three bed units in particular are larger than the minimum standards.

53 The scheme has been designed to maximise the amount of double aspect units. This is particularly important for this development given the relationship of the scheme with the existing buildings on either side of Surrey Row and Pocock Street.

54 In accordance with the design standards, each of the three bed units has a private amenity/balcony area of at least 10 sqm. The majority of the two bed units also enjoy private amenity areas of at least 10 sqm. Communal amenity space is also provided on the roof of the six storey part of the building (500 sqm) and at ground floor level. The communal amenity areas exceed the shortfall of private residential amenity space (125 sqm) from the those one and two bed flats which do not enjoy 10 sqm amenity areas and therefore complies with the design standards on amenity space. A contribution towards off site amenity is also to be provided in accordance with the S106 Toolkit requirements.

55 Ten of the proposed units (10% of all habitable rooms) are designed for wheelchair users, seven of which are private dwellings and three of which are affordable. A condition is recommended requiring these to be constructed in accordance with the 'Southeast London Housing Partnership Wheelchair Design Guidelines'.

56 Details of noise mitigation installation, extraction details and air quality measures are capable of being secured via planning condition.

57 In conclusion, the scheme proposes a suitably high standard of residential accommodation, exceeding minimum design standards, that is appropriate for the high density proposed.

Affordable Housing

58 The scheme proposes a total of 17 affordable units amounting to 20% of the total number of habitable rooms. The affordable housing provided consists of 12 social rent units and 5 shared ownership units amounting to a 71:29 % split. The social rent units comprise 6 x one bed and 6 x three bed units, whilst the shared ownership units

comprise 2 x one bed and 3 x two bed units.

- 59 Policy 3.12 of the London Plan requires that the maximum reasonable amount of affordable housing should be sought when negotiating on individual schemes, having regard to:
- a) Current and future requirements for affordable housing at local and regional levels,
 - b) Affordable housing targets,
 - c) The need to encourage rather than restrain residential development,
 - d) The need to promote mixed and balanced communities,
 - e) The size and type of affordable housing needed in particular locations,
 - f) The specific circumstances of individual sites.
- 60 In recognising the pressing need for affordable housing within the borough, Strategic Policy 6 (Homes for people on different incomes) of the Southwark Core Strategy includes the requirement that developments should provide as much affordable housing as is reasonably possible requiring as much affordable housing on developments of 10 or more units as is reasonably viable with a minimum target required of 35%.
- 61 Saved Policy 4.5 of the Southwark Plan allows for the provision of each affordable wheelchair unit to amount to a reduction of 1 habitable room in the target for affordable housing. In this case, this would reduce the target to 85 rooms, or 34%.
- 62 The applicant has submitted a viability appraisal with the application which has been assessed by the in-house property valuation team. The borough valuer does not agree with the results of the applicant's viability assessment and concludes that the development is capable of viably delivering more affordable housing than proposed in the application. In particular, the borough valuer considers that the scheme revenues have been significantly understated, including sales values, and, to a lesser degree, costs such as building costs have been overstated. When combined with changes to the project time scale and cash flow, a significantly higher land value arises which is a much more realistic reflection of the market for this location.
- 63 Whilst acknowledging that the scheme provides a range of tenure options and includes six family sized social rented units which are particularly needed in the area, it is considered that the overall affordable housing provision is below what the development can viably support.
- 64 The applicant received the assessment of the Council's valuation team very shortly before this committee report was finalised (the applicants viability information was updated to reflect the design and layout revisions to the scheme). It is understood that the applicant will submit further information on the viability and affordable housing position following further discussions with officers. Members will be updated on any further relevant information through an addendum to this report.
- 65 In conclusion, the affordable housing proposed does not meet the minimum policy requirement of 35% and the Council's considers that the viability information provided with the application does not demonstrate that as much affordable housing has been proposed as is financially viable for this development. The application is therefore contrary to Strategic Policy 6 (Homes for people of different incomes) of the Southwark Core Strategy 2011 and Policy 3.12 (Negotiating affordable housing on individual private residential and mixed use schemes) of the London Plan 2011.

Transport issues

- 66 The site has the highest possible PTAL (Public Transport Accessibility Level) of 6b

and therefore enjoys excellent public transport accessibility including bus, underground and rail. No general car parking is proposed which is supported by policies seeking to minimise the use of private cars in areas with excellent access to public transport. The Traffic Order would be amended to prevent future residents of the scheme from applying for on-street parking permits. The s106 agreement will also include a commitment by the developer to pay for three years car club membership for residents of the development. There are two existing on-street car club spaces in close proximity to the site.

- 67 Eight off-street disabled parking spaces, accessed from Surrey Row with egress onto Pocock Street, are proposed at ground floor level within the building to serve the ten wheelchair units within the development. Given the excellent accessibility of the site, including public transport links close to the site, this provision is considered to be acceptable for this development.
- 68 A total of 96 secure cycle parking spaces are provided for the private and affordable residential apartments in accordance with the Council's standards, at ground floor level and within the basement of the building. In addition, six external cycle parking spaces are proposed on Surrey Row. The cycle parking accords with the Council's policies in respect of both numbers and type.
- 69 A Framework Travel Plan has been submitted with the application setting out the measures to enable residents, employees and visitors of the development to make more informed decisions about their travel and to encourage sustainable forms of travel, including cycle use. A requirement for a full travel plan to be submitted and monitored should be included in the s106 agreement, if planning permission is granted.
- 70 Servicing and refuse collection are proposed to be undertaken from Pocock Street. The Transport Assessment submitted with the application calculates that there would be expected to be an average of nine servicing trips per day in connection with the residential units and nineteen trips per day for the commercial units. This assessment of trips is considered by Officers to be reasonable. Given that a) there are not anticipated to be a significant amount of trips generated, and b) servicing vehicles such as refuse vehicles would only be stationary in the highway for a short period of time, it is not considered to be necessary for off street parking space to be provided for this scheme. Metered parking bays are also available in the vicinity of the site for parking of servicing vehicles (plumbers, fitters etc) for longer periods of time.
- 71 A Construction Management Plan and Delivery and Servicing Management Plan are recommended to be required by condition.
- 72 In addition to the toolkit contributions towards Strategic Transport, Site Specific Transport and Public Realm the applicant has agreed with TfL to pay an additional £50,000 contribution towards the Blackfriars Road improvement scheme.
- 73 On transport matters, it is concluded that the proposals will promote sustainable travel and will not result in any adverse impacts upon local highway conditions in accordance with the relevant transportation policies including Strategic Policy 2 (Sustainable Transport) of the Southwark Core Strategy and saved Policy 5.2 (Transport Impacts) of the Southwark Plan.

Planning obligations (S.106 undertaking or agreement)

- 74 Through the s106 agreement the development will make a financial contribution of £682,516 towards local infrastructure and facilities, this being proportionate to the impacts of the development upon the local area. This includes a contribution of

£50,000 towards the proposed Blackfriars Road improvement scheme, which is in addition to the standard Southwark S106 toolkit contributions.

- 75 The table below sets out the agreed financial contributions that will be paid by the developer:

Planning Obligation	Toolkit Standard Charge	Proposed Contribution
Education	£158,459	£158,459
Employment in the development	n/a	n/a
Employment during construction	£64,704	£64,704
Employment during construction management fee	£5,071	£5,071
Public open space	£27,541	£27,541
Children's play equipment	£12,389	£12,389
Sports development	£67,208	£67,208
Transport Strategic	£43,941	£43,941
Transport Site Specific	£43,500	£43,500
Public Realm (General)	£65,250	£65,250
Public Realm (Blackfriars Rd)	Non toolkit requirement	£50,000
Health	£98,214	£98,214
Community Facilities	£14,229	£14,229
Admin Charge	£12,101	£12,101
Total	£612,607	£662,607

76

Other obligations to be included in the s106 agreement are:

- Provision of 20% affordable housing on the site comprising a 71%/29% split between social rent and shared ownership.
- Affordable housing viability review
- Travel Plan including monitoring
- Car club membership for three years
- Future proof connection to district heating network
- Provision of wheelchair units
- Highway works, public realm works and road safety audit

- 77 In the event that the members of the planning committee resolve to grant permission and the section 106 agreement is not signed by 21 October 2013, it is recommended that the Head of Development Management be authorised to refuse the application 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 the public realm, public open space, health care provision, the transport network, and employment and the proposal is therefore contrary to Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan.

78 **Community Infrastructure Levy**

S143 of the Localism Act 2011 states that any financial sum that an authority has received, will or could receive in the payment of a CIL is a material 'local financial consideration, in planning decisions. The requirement of the Mayoral CIL is a material

consideration. However, the weight to be attached to a local finance consideration remains a matter for the decision maker. Mayoral CIL is to be used for strategic transport improvements in London, primarily Crossrail. In Southwark, the levy is applied to all developments at a rate of £35 per square metre. The CIL contribution is based on all the additional floor space created. This amounts to 6937 sqm resulting in an applicable CIL payment of £242,795.

Sustainable development implications

- 79 Core Strategy Strategic Policy 13 (High Environmental Standards) requires all proposed development to investigate the feasibility of using decentralised CHP or CCHP (Combined Cooling Heat and Power) systems and development of over 40 dwellings should be connected to existing or those being developed area-wide CHP or CCHP systems where they are within 200m of the site. The scheme proposes a Gas-fired CHP system. The energy strategy addresses the energy hierarchy of “Be Lean”, “Be Clean”, and “Be Green” stages to reduce the energy consumption of the development. The energy statement confirms that space allowance in the plant space will be provided for heat exchangers to connect to an off-site district heating and cooling network. This needs to be secured through the s106 agreement.
- 80 The energy statement submitted with the application states that utilising a large CHP plant to provide heat will provide an estimated CO2 emission saving of approximately 25% over Part L of the 2010 Building Regulations.
- 82 The London Plan (2011) also states that there is a presumption that all major development proposals will seek to reduce carbon dioxide emissions by at least 20 per cent through the use of on-site renewable energy generation wherever feasible.
- 81 The statement states that a number of renewable technologies have been appraised in terms of technical, physical and financial feasibility, as potential renewable systems for use on the project. Each technology was considered as an alternative option operating in conjunction with CHP. Solar photovoltaic panels (PV) are proposed onto the roofs of the building, achieving a 5.9% CO2 reduction.
- 82 The energy and sustainability strategies set out how the development is capable of achieving Code for Sustainable Homes Level 4 for the residential accommodation and BREAM excellent for the commercial premises in accordance with the Strategic Policy ENV13.
- 83 Overall, whilst the development is not able to provide, a 20% reduction in carbon dioxide from on site zero carbon sources of energy, it has been demonstrated why this is not possible in this case. The proposed CHP and air source heat pump systems will provide an efficient and sustainable source of energy for the scheme which generally accords with the targets set out in Strategic Policy 13.

Other matters

- 84 *Demolition and Construction Works*
Provided the works take place in accordance with best practice and relevant legislation it is not considered that the demolition and construction works associated with the development would result in significant impacts upon properties in the vicinity of the site, including the cumulative impacts along with other development that may be proceeding in the area at the same time. A condition is recommending requiring works to be carried out with an Environmental Management Plan which will need to be submitted to and approved in writing by the Council prior to the commencement of works. This should include consideration and the environmental impacts and the required remedial measures.

85 *Flood Risk*

The site is located in Flood Zone 3 which is deemed to be high risk though it is within an area benefiting from the River Thames tidal flood defences. The application includes a Flood Risk Assessment (FRA) and the Environment Agency has confirmed it has no objections subject to a condition requiring that the development is carried out in accordance with the mitigation measures included in the FRA.

86 *Ecology*

The site does not affect any site of ecological importance. As ecological assessment has been submitted with the application which recommends several ecological enhancements which can be secured through conditions of planning permission including the use of a green/brown roof, native planting details and species encouragement.

87 *Archaeology*

The applicants have submitted a desk-based assessment. The application is located over the boundary of the parish of Christ Church Blackfriars and Paris Garden Manor. This boundary appears to be a long-standing landscape feature and is likely to be of early medieval origin. It is likely that the boundaries of Paris Gardens Manor are those of the estate known as Wideflete donated to Bermondsey Abbey in 1113, and subsequently passed to the Templar and Hospitaller knights before entering secular ownership with the dissolution of the monasteries. There is a potential that this boundary follows an existing landscape feature or relict watercourse and it is worth of record, should it survive on site. The use of part of the site as an emery and blacking factory is also worth of record. Industrial uses of this kind have been little investigated and are worthy of record.

The buildings presently occupying the Blackfriars street frontage are of interest and townscape value, and, as such are worthy of record. It is therefore recommended that they should be subject to archaeological building recording.

It is recommended that conditions are attached in relation to:

- i) Submission of a written scheme of investigation
- ii) Archaeological Building Recording
- iii) Archaeological Reporting

Conclusion on planning issues

88 The application proposes a high density residential led mixed use redevelopment scheme proposing a range of residential apartments and flexible ground floor retail/commercial and community uses.

89 Whilst the existing buildings have some merit, they are not particularly good examples of their type, and it is considered their loss could be justified provided the replacement buildings are of a suitably high design quality to outweigh the limited harm that would result from the demolition of the existing buildings.

90 The proposal is a high quality architectural design and urban design which responds to its urban and historic context and reinforces them without being overly dominant. The mix of uses and the arrangement of height scale and massing are appropriate and the views demonstrate that the development will be a positive addition to the Blackfriars Road area. The development would preserve the setting of both nearby listed buildings and conservation areas.

- 91 In terms of layout the residential accommodation, in the majority of cases, the flat and room sizes exceed the Council's standards with double aspect units prevalent. Private amenity space is good and additional communal amenity space is provided on the roof of the building. Putting aside the affordable housing issues, the standard of residential accommodation is high and meets the Council's expectations for developments of greater density than the recommended ranges.
- 92 Following the receipt of amended plans the rear section of the development has been reduced in height by one storey. Whilst the development will still be a strong presence when viewed from facing residential properties in Helen Gladstone House and result in some impacts upon day and sun light, it is not considered that the revised proposal would result in such significant impacts upon living conditions of these, or any other, neighbouring properties, to justify refusing permission.
- 93 However, the affordable housing proposed does not meet the minimum policy requirement of 35% and the Council's considers that the viability information provided with the application does not demonstrate that as much affordable housing has been proposed as is financially viable for this development. The benefits of the scheme as set out above in paragraphs 88-92 do not outweigh the failure of the proposed development to provide the maximum reasonable amount of affordable housing, which is a strategic priority for both Southwark and London. The application is therefore contrary to Strategic Policy 6 (Homes for people of different incomes) of the Southwark Core Strategy 2011 and Policy 3.12 (Negotiating affordable housing on individual private residential and mixed use schemes) of the London Plan 2011.
- 94 All other matters and issues raised in policies and representations have been taken into consideration but none of which are considered to result in significant planning impacts.

Community impact statement

- 95 In line with the Council's Community Impact Statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.
- 96 a) The impact on local people is set out above.
- b) The following issues relevant to particular communities/groups likely to be affected by the proposal have been identified as
- c) The likely adverse or less good implications for any particular communities/groups have been also been discussed above. Specific actions to ameliorate these implications are

Consultation

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

Consultation replies

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

Human rights implications

- 98 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.
- 99 This application has the legitimate aim of seeking planning permission for a mixed use redevelopment scheme. 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.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

- 100 Advice sought from other officers is summarised in the body of the main report and reported in Appendix 2.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1390-169 Application file: 13/AP/0966 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 4351 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Images
Appendix 4	Recommendation

AUDIT TRAIL

Lead Officer	Gary Rice, Head of Development Management	
Report Author	David Cliff, Team Leader, Major Applications	
Version	Final	
Dated	15 August 2013	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments Included
Strategic Director of Finance and Corporate Services	No	No
Strategic Director, Environment and Leisure	Yes	Yes
Strategic Director, Housing and Community Services	Yes	Yes
Director of Regeneration	No	No
Date final report sent to Constitutional Team	22 August 2013	

APPENDIX 1

Consultation Undertaken

Site notice dates: 07/05/2013 & 16/08/13

Press notice date: 09/05/2013

Case officer site visit date: 07/05/2013

Neighbour consultation letters sent: 09/05/2013 & 16/08/13

Internal services consulted:

Transportation Team
Environmental Protection Team
Ecology Officer
Archeological Officer
Planning Policy Team
Housing
Economic Development

Statutory and non-statutory organisations consulted:

Environment Agency
Transport for London
Thames Water
Metropolitan Police
Heath and Safety Executive
Victorian Society
Georgian Society

Neighbours and local groups consulted:

Residents living within approximately 100m of the site boundaries have been consulted.

Re-consultation:

Following the receipt of amended plans site notices have been posted and notification letters sent to all those residents originally notified along with additional residents who have made representations.

APPENDIX 2

Consultation Responses Received

Internal services

Transportation Team

Servicing and Refuse: Servicing and refuse collection will be undertaken from Poco. Due to site constraints no off street serving facilities can be provided. Given the nature of the proposed development and the location of the bin stores it is not thought there will be:

- many service vehicle movements associated with the above application; or
- refuse vehicles stationary in the highway for an extended period.

The applicant should be aware of any loading waiting and restrictions that operate in the area and that any contraventions will be enforced accordingly.

Given the car free nature of the proposed development the trips associated with vehicles is expected to be low.

Cycle storage: The Transport Group do not have any reason to suggest a refusal with regards to the number of cycle spaces that have been provided. However, the applicant will be required (through the travel plan) to revisit how well the cycle storage area is being used. If the cycle stands are not being used to the full capacity, then, through the Travel Plan the applicant will need to show how they are expecting to encourage and increase the use of cycles. (eg installing cages/lockers to allow users to store their helmets, wet jackets shoes etc). However, if the cycle storage is well used the applicant will need to demonstrate how they will accommodate the high use of cycle storage (eg increase the cycle storage area)

The applicant is required to submit to the Council, for approval, detailed and scaled drawings to demonstrate the storage to be of the dimensions, and be of a recommended style as stated in our best practice guidance.

Recommend Sheffield stands as the preferred cycle storage method in all cases and request that the applicant makes every attempt to provide these in the design. Two-tiered or vertical (and semi-vertical) storage systems are not recommended; although manufacturers will often state the ease of use of such systems, it is known that the elderly, children and the mobility-impaired often have difficulty in using them.

No cycle storage has been provided for the use of each commercial element of the development. The applicant should refer to the London Plan (table 6.3 page 207) to ensure that they provide the required provision. The proposed cycle storage should adhere to the requirements set out within the Southwark Plan-Policy 5.6.

For reasons of security cycle storage will need to be stored separately for all elements of the development.

Car Parking: The site is located in an area that benefits from a high PTAL (6) and excellent transport links. The applicant proposes a car-free development (with the exception of disabled parking), as is required by policy for developments within a CPZ and within the CAZ a car-free development. However, without controls on the issue of residents' and business parking permits, the imposition of additional demand for on-

street parking would be to the detriment of the amenity of existing residents. Therefore it is recommended that new residents and businesses are excluded from eligibility for on-street parking permits in the usual way.

Travel Plan: The framework travel plan submitted with the application is of good standard; however, it is requested that the applicant makes amendments prior to the full travel plan being submitted prior to occupation. The following areas must be changed/added

The number of residents expected on site must be given.

- Cycle storage-reviewing the cycle storage in one years time to asses the cycle use and how the applicant will try to encourage more residents to cycle, or increase the cycle storage area if it is well used.
- Zip Car-All eligible adults (residential) to be provided with three years minimum membership.

A full travel plan must be submitted and approved by the Local Authority prior to occupation.

Should planning permission be granted it is recommended that a full travel plan is secured by Section 106 agreement and through this; commitment to surveying residents at 1, 3 and 5 years, commitment to updating the travel plan following each of the surveys, and commitment to measures identified within the travel plan, should be sought. If a Section 106 is not applicable then it is recommended that a Travel Plan condition incorporating the above requirements is applied.

Should planning permission be granted, it is recommended that a sum of £3,000 is secured for LBS's monitoring of the travel plan, either through the Section 106 agreement or unilateral undertaking.

Public Realm: A list of public realm comments have been provided and all public realm details will required the approval of the Highway Authority.

Archaeological Officer

The applicants have submitted a desk-based assessment. The application is located over the boundary of the parish of Christ Church Blackfriars and Paris Garden Manor. This boundary appears to be a long-standing landscape feature and is likely to be of early medieval origin. Certainly it is likely that the boundaries of Paris Gardens Manor are those of the estate known as Wideflete donated to Bermondsey Abbey in 1113, and subsequently passed to the Templar and Hospitaller knights before entering secular ownership with the dissolution of the monasteries. There is a potential that this boundary follows an existing landscape feature or relict watercourse and it is worth of record, should it survive on site.

The use of part of the site as an emery and blacking factory is also worth of record. Industrial uses of this kind have been little investigated and are worthy of record.

The buildings presently occupying the Blackfriars street frontage are of interest and townscape value, and, as such are worthy of record. It is therefore recommended that they should be subject to archaeological building recording.

It is recommended that conditions are attached in relation to:

- i) Submission of a written scheme of investigation
- ii) Archaeological Building Recording

iii) Archaeological Reporting

Ecological Officer

The preliminary ecological appraisal meets best practice and its conclusions and recommendations are agreed. With regards to bats there is negligible potential for the site to support roosting bats.

Conditions are recommended relating to green/brown roofs, native planting details and insect, bird and bat homes.

Environmental Protection Team

The proposed development lies within the heart of the AQMA and will introduce some 250 + new residents to pollution exposure. The applicants consultants have concurred that pollution objectives are exceeded however have concentrated their assessment and report on the contribution this development may have – which I agree would be negligible in traffic terms. It does not appear the proposed CHP energy system has been evaluated for its pollution potential. It is proposed that the development will be mechanically ventilated by a centralised system, which together with the window design to provide the sound insulation levels required should reduce exposure.

Although the commercial units are speculative A1 – A5 - the opportunity should be taken to design in a vertical discharge connection for kitchen extract equipment to be connected to for commercial cooking operations within A3 /5.

The development will be exposed to external environmental noise principally from road traffic and the residential accommodation and particularly on the Blackfriars Road facade needs to adequately sound insulated. Clement Acoustics have undertaken assessment and their findings have advised the extent of insulation required to each facade, however this has been based on BS standard where 40dBA living rooms and 35dBA bedrooms is defined. Suggest a validation test shall be carried out on a relevant sample of premises following completion of the development but prior to occupation. The results shall be submitted to the LPA for approval in writing.

Conditions are recommended requiring:

- Details of CHP plans and dispersion of flue gases.
- Kitchen extraction equipment
- Internal and external noise levels
- Sound insulation between commercial and residential premises
- Plant noise details
- Contamination surveys and mitigation
- The submission of an Environmental Management Plan

Planning Policy Team

The redevelopment of the site for mixed use development comprising of commercial units on the ground floor and residential on the upper floors is consistent with overarching policy of locating higher density schemes in areas of excellent public transport accessibility, and in town centres. However, the density of the scheme at 1,570 hrh exceeds the maximum set out in Policy 5 of the Core Strategy for the CAZ (1,200 hrh). The scheme must demonstrate an exemplary standard of design and excellent level of accommodation in order to justify this level of density.

This level of affordable housing is not policy compliant. We will only consider affordable

rent once a financial appraisal has been submitted to demonstrate why the policy requirement cannot be met, in line with the Affordable Housing SPD. If the financial appraisal demonstrates to our satisfaction that the required level or mix of affordable housing is not financially viable we will consider proposals for affordable rent in line with the 3 options set out in the December 2011 committee report.

The proposal does not meet the Policy 13 target for CO2 reduction from the use of on-site low and zero carbon technologies. Recommend that further work is undertaken, secured by planning condition, to determine whether any additional savings in CO2 emissions can be achieved.

The proposed ground floor commercial frontage complies with policies and Draft SPD. The SPD also encourages flexibility in the design of the commercial units to permit adaptability for multiple uses if needed in the future. Support the provision of a D1 community use as part of this mixed use development.

Statutory and non-statutory organisations

Georgian Group

Objects to the demolition of 173 Blackfriars Road, in principle, on the grounds that it is an undesignated heritage asset that is a positive contributor to the public realm. The retention of this building is in line with Southwark Council's and Transport for London's aspirations to regenerate this corridor as a quality gateway into the city, as first envisaged by The Corporation in the 18th Century. The contribution to the public realm and the retention of historic assets is one way that the street's significance can be enhanced.

The current proposals are to demolish a historic building of historic character, and three storey's high, and replace it with a seven storey tower; this cannot be considered to be in accordance with the draft Bankside, Borough and London Bridge SPD. The existing pub/restaurant is likely to encourage people to 'visit and linger' to a greater extent than the proposed commercial tower.

The demolition of a public house, a facility that can provide many community benefits, is clearly contrary to the aims of the NPPF on community facilities.

The Georgian Group recommends that the application is refused on the grounds that it will result in the demolition of a building of good local character, within an area defined by a draft SPD as being in need of environmental improvements, and loss of a positive community facility, as defined by the NPPF (para 70). We consider the application to be in conflict with the aim of local planning documents and the NPPF. The group objects to the application in principle.

Victorian Society

Objects to the proposed demolition of the historic buildings at 169-173 Blackfriars Road. The buildings are modest historic structures which contribute positively to the character of the surrounding streetscape. 169-172 is an early 20th century mansion block of red brick construction. With a chamfered south-western corner to address the southern approach, free use of simple ornamentation and strong vertical emphasis - reinforced by its protruding central gabled bay - confer the building with presence, character and aesthetic appeal. The same is true of the three storey public house on the north western corner of the site. Though altered, it retains its basic historic form, window surrounds and some historic decorative treatment.

Both buildings possess good local character and contribute positively to the streetscape

and should be considered non-designated heritage assets, a material consideration in evaluating planning applications, in line with paragraph 135 of the NPPF.

Given the considerable extent of the application site, there should be sufficient room to provide the desired buildings to the rear of the two retained historic buildings.

The Conservation Areas Advisory Group for Southwark

This project is a conservation disaster for the regeneration of the Blackfriars Road. Proposed is the demolition of a handsome pair of substantial 19th century buildings to make way for a tall, block-wide housing project. The two buildings proposed for demolition are a handsome late-19th century Renaissance Revival block of flats and a mid-19th century stucco fronted Italianate pub. Both these buildings are in use are in good condition and complement the existing collection of 19th century public and commercial architecture on the Blackfriars Road. The demolition of these buildings would be a great loss to the historic environment on the Blackfriars Road and diminish the integrity conservation areas surrounding it.

The site of the proposed development is very deep, extending back about 60 meters along Pocock Street. Our recommendation is to preserve the historic buildings to the Blackfriars Road and create a dense new development to the rear, eastern part of the site. The two historic buildings could potentially be extended vertically.

The Blackfriars Road is one of Southwark's finest avenues and an important route into the borough from the north. We welcome intelligent new development, but lets not waste its historic buildings. There is a lot of new development on this Road, this must be balanced with the preservation of the existing 19th century fabric of this street. We recommend the refusal and a more sensitive re-design of this scheme. Surely the preservation of these buildings is would also help create a greener more environmentally friendly scheme.

CAAG also suggests that there should be more attention to the public frontage to Blackfriars Road, i.e. reinstatement of York stone paving, and appropriate large street tree planting e.g. London Plane as a part of a street-long treatment of Blackfriars Road from Blackfriars Bridge to St George's Circus.

Environment Agency

No objections raised subject to conditions relating to:

- i) Implementation of the approved flood risk strategy,
- ii) Submission of a scheme to deal risks associated with contamination,
- iii) Previously unidentified contamination,
- iv) Piling and other foundation designs using penetrative methods,
- v) Infiltration of surface water drainage

Thames Water

No objection with regard to sewerage or water infrastructure. Further details of the impacts of piling upon sewerage and water infrastructure should be agreed in writing with the Local Planning Authority before any piling is commenced.

Neighbours and local groups

Forty four letters of objection (including twenty three pro-forma letters) have been received from residents living in the vicinity of the site. The issues raised are summarised below:

- Loss of existing buildings will be detrimental to the character of the area. There is a lack of historic buildings in the area. Design could incorporate the existing terrace and public house, or at least the facades, with new development built behind. Inaccuracies within applicants heritage statement.
- Loss of local facilities such as cafe, newsagent, dry cleaners and pub.
- Impact on living conditions of neighbouring properties from construction noise, disturbance and pollution.
- Loss of daylight/sunlight and overshadowing to adjacent residential buildings. Previous proposal had to be kept at same height as Pakeman House.
- Future residents would have access to day light and sunlight obstructed by Manna Ash House.
- Overshadowing of park area of Nelson Square and community garden in Surrey Row.
- Impact on amenities in the local area (i.e. parking, open spaces, GP surgeries)
- Design, appearance, bulk, height and general scale of the development is not appropriate to the local area and surrounding buildings.
- Proposed development is too high. Building is out of scale with surrounding development. Height should be compatible with Pakeman House.
- Overdevelopment of the site.
- Unimaginative design.
- Insufficient details of materials provided with application.
- Disturbance from increase in traffic.
- Disturbance and obstruction from delivery and service vehicles.
- Loss of and interference with on-street parking spaces.
- Insufficient pavement around the building.
- Proposed safety barrier on roof will add height to the building.
- Loss of privacy from windows, balconies and amenity areas.
- Details of public amenity space are unclear. Existing green spaces are already under great pressure to which this will add.
- Loss of independent shops and bars. Do not want to see more chain stores and restaurants.
- Development should provide more 3/4 bedroom family homes.
- Cumulative impact of this and other developments needs to be considered, visually and in terms of local resource and infrastructure planning.
- Impacts upon road safety, including pedestrian and child safety.
- Attention needs to be paid to the utilities infrastructure, particularly water and sewage systems.
- Area will become over populated.
- Insufficient affordable housing provision.
- Interference of TV signals in Nelson Square.
- Wind tunnel effect from proposed building.
- Other developments in area have been built but are empty.

The representations from neighbours outline above were received from the following addresses:

- Helen Gladstone House (3)
- Pakeman House (16)
- Rowland Hill House (6)
- Webber Street (1)
- Nelson Square (3)
- Pocock Street (1)
- Bridgehouse Court (1)
- Blackfriars Road (1)
- Ring Court (1)

- Applegarth House (8)
- Rushworth Street (1)
- Unspecified (2)

BNP Paribas on behalf of the City of London Corporation (COLC)

- The COLC Estate Managers Office for Pakeman House is located immediately to the east of the application site.
- Imperative that the development proposals do not prohibit the future development of Pakeman House site. Discussions, at an early stage, are ongoing with Linden Homes in relation to the potential of a comprehensive development.
- Proposals would compromise the future development of Pakeman House by virtue of restricting the daylight/sunlight received by the site as well as overshadowing.
- Overlooking from proposed windows and balconies would restrict the developable area of Pakeman House.
- The position of the proposed building in close proximity to Pakeman House would leave very limited options for mitigating impacts.
- COLC request that the proposed fenestration and external amenity areas are reviewed to ensure no overlooking of the adjacent site.
- The high density and design of the scheme could limit the development potential of the adjacent site and would represent an overdevelopment.