

Item No. 6.4	Classification: Open	Date: 1 July 2014	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 13/AP/3791 for: Full Planning Permission Address: 1, 3-5. 7-19 VALENTINE PLACE AND 21, 27-31 WEBBER STREET, LONDON SE1 8QH Proposal: Demolition of 1, 3-5 Valentine Place and 27-31 Webber Street and part demolition of 7-19 Valentine Place and 21 Webber Street (facades retained). Redevelopment of the site to provide 62 residential units (max 7 storeys), 3853.6sqm Class B1 (business) and 138.4sqm A1/A3 (retail and food and drink) floorspace, together with landscaping and car parking.		
Ward(s) or groups affected:	Cathedrals		
From:	Head of Development Management		
Application Start Date 22/11/2013		Application Expiry Date 21/02/2014	
Earliest Decision Date 12/01/2014		PPA Date 30/09/2014	

RECOMMENDATION

- 1 That planning permission is granted subject to conditions and the applicant entering into an appropriate legal agreement by no later than 30 September 2014;
- 2 In the event that the requirements of (a) are not met by 30 September 2014, the Head of Development Management be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 171.

BACKGROUND INFORMATION

Site location and description

The site

- 3 The application site contains the buildings and land located at 1-1A, 3-5, 7-19 Valentine Place and 21, 27-31 Webber Street comprising a total area of 0.34 hectares. The site is bounded by Valentine Row, Valentine Place and Webber Street within the Valentine Place Conservation Area and is located to the west of Blackfriars Road roughly equidistant from Southwark Underground Station and St Georges Circus.
- 4 1-1A Valentine Place is a gap site following the demolition of a four storey brick building on the corner of Valentine Place and Valentine Row. At present the gap site is fenced/walled off from general public access and is used for storage and parking.
- 5 3-5 Valentine Place is a predominately single storey brick industrial building, 'L' shaped in plan with access directly onto Valentine Place and a large enclosed storage yard adjacent to the site at 1-1A Valentine Place. There is an additional pedestrian access to the rear of the building onto Valentine Row. Currently in use as a workshop and storage space the site employs about 15 people.

- 6 7-19 Valentine Place and 21 Webber Street comprise the former Maltina Bakery buildings which are a locally significant heritage asset due to the contrast of the buildings' Edwardian neo-classical style with the rather utilitarian nature of the other industrial buildings within the area. Rising to part two/part three storeys, the building is currently used as office and storage space employing approximately 12 people.
- 7 27-31 Webber Street is a one and a half storey 1970's brick built depot building on the corner of Valentine Row and Webber Street. The building is currently used as a film studio employing approximately 17 people.
- 8 Whilst it is noted that none of the buildings are listed, 7-19 Valentine Place and 21 Webber Street form a significant part of the Valentine Place Conservation Area and are a locally important heritage asset. In terms of policy designations, the site is located within the Central Activities Zone, Air Quality Management Area, Bankside and Borough District Town Centre and forms part of the Bankside, Borough and London Bridge Opportunity Area. In terms of public transport the accessibility rating is 6B reflecting the site's excellent level of access to public transport.

The surrounding area

- 9 To the north and eastern sides of the site across Valentine Place are the commercial properties of 93-101 Blackfriars Road, 2-10 Valentine Place and 12-14 Valentine Place. To the north east corner of the site is the recently completed office development at 'One Valentine Place'.
- 10 To the south west corner of the application site on the corner of Valentine Place and Webber Street is the residential building of Quentin House. Opposite Webber Street are further residential properties at 6 Baron Place and the flank elevations of 2-8 and 34-36 Webber Row. Additionally to the south of the site across Webber Street is a Special Education building and a recently constructed apartment building at 46-48 Webber Street.
- 11 To the eastern side of the site across Valentine Row is Bridgehouse Court at 109-115 Blackfriars Road. Valentine Row is a very narrow thoroughfare with the ground floor of Bridgehouse Court serving as a car park and residential accommodation on the upper levels. Adjacent to Bridgehouse Court is The Crown Public House which also includes residential accommodation on the upper floors.
- 12 The site lies to the west of the Blackfriars Road corridor which is the focal point of several large scale developments at various stages of development, the most relevant of which are detailed in the planning history section below.
- 13 The site lies close to the boundary with the London Borough of Lambeth with the borough boundary running along Pontypool Place and around Chaplin Close.

Details of proposal

- 14 Planning consent is sought for the demolition of all buildings on site with the exception of the facade of the former Maltina Bakery buildings at 7-19 Valentine Place and 21 Webber Street and redevelopment to provide a total of 62 self contained dwellings, 3853.4sqm (GIA) of Class B1 (office) floorspace and 138.4sqm of Class A1-A3 (retail/service/restaurant/cafe) floorspace. The development will be spread over five buildings (Blocks A-E) set around a communal courtyard and will include disabled car parking, basement cycle parking and landscaping.

15 Schedule of accommodation

	Market Housing	Affordable Rent	Intermediate	Total
1 Bedroom	4	6 (4W)	2	12 (20%)
2 Bedroom	20	6 (2W)	4	30 (49%)
3 Bedroom	14	1	14	14 (23%)
4 Bedroom	5			5 (8%)
Total	43	13	6	62

- 16 Block A - Built behind the retained facade of the former Maltina Bakery buildings, this block will be fully residential with access provided from both Webber Street and Valentine Place. Block A rises to four storeys in height with the top floor recessed to provide roof terrace amenity space for individual units. The total number of residential units provided in Block A is 24, comprising 21 private units and three shared ownership units.
- 17 Block B - Occupies the plot of 27-31 Webber Street and accommodates the disabled parking (six spaces) and bin stores, 55sqm Class A1-A3 floorspace and 16 flats all of which will be affordable housing. Block B rises to four storeys in height with the top floor slightly recessed and whilst the majority of the frontage is on Webber Street, the residential access will be from the corner of Valentine Row at Webber Street.
- 18 Block C - Comprises five, three storey terraced dwellinghouses with front and rear gardens, for private sale.
- 19 Block D - Is proposed as a part three/part seven storey office building (3992sqm GIA) with the top floor recessed. Building D includes 79sqm of Class A1-A3 floorspace at ground floor level adjacent to the gable of Block C and linked to the main office building at Block D by a covered walkway. Block D also provides a large basement area accommodating shower facilities, washrooms, office refuse and access to the basement of Block E where the cycle parking will be located.
- 20 Block E - Accommodates office space at ground floor level (approximately 273 sqm), access to the basement accommodating both residential and office cycle parking (96 spaces and 124 spaces respectively), refuse storage and plant. Block E rises to five storeys with the top floor recessed and provides 17 market dwellings on the upper floors.
- 21 As well as private amenity space in the form of balconies and terraces for the majority of units, several of the ground floor properties will benefit from rear gardens all units will have access to a large communal amenity space provided within the central courtyard. In terms of materials, all buildings on site will be brick-built to reflect the areas heritage, however a different material palette will be employed for each building in order to ensure a degree of distinctiveness between the buildings on site.
- 22 Servicing is provided in two locations. The servicing of the office block will take place in a semi off-street lay-by on Valentine Place close to the main entrance of the office building. A secondary servicing location will be located on Webber Street close to the parking access and refuse store in Block B. The development is proposed as 'Car Free' with the exception of the disabled car parking. Ground to air source heat pumps are proposed across the development in order to reduce carbon output and improve sustainability and public realm works are proposed for Valentine Row including tree planting.

Planning history

- 23 There have been no planning applications for the application site that are of relevance

to this proposal. The following pre-application history is of relevance;

- 24 12/EQ/0234 – Proposed re-development of site bounded by 1a, 3-5, 7-19 Valentine Place, and 21, 27-31 Webber Street.
- 25 13/EQ/0003 - Redevelopment of site bounded by 1a, 3-5, 7-19 Valentine Place, and 21, 27-31 Webber Street to provide 74 residential units and new office floorspace (approx 4400 sqms) in buildings of up to 7 storeys in height. At the time of the pre-application enquiry officers had concerns regarding the height, scale and massing of the proposal, particularly in terms of the commercial block and the residential block on Valentine Place. Concerns were also raised regarding the quality of accommodation; the loss of fabric of the retained building; dwelling mix; the quality of the public realm; the quality of design and the architectural expression and the potential impact on the setting of the conservation area. Officers also raised concerns about the lack of information provided relating to affordable housing or viability.

Planning history of adjoining and nearby sites

- 26 169-173 Blackfriars Road: a part 10 storey / part 6 storey building comprising 86 residential units, five retail/commercial units totaling 451 sqms (Use Classes A1-A5 and D1), a reception area, ancillary cycle and disabled car parking, private and public amenity space, basement and ancillary plant. (ref 13/AP/0966, GRANTED - 03/09/2014). This development is currently under construction.
- 27 12 Valentine Place - 13/AP/1336 - Minor elevational alterations to front, comprising installation of vertical glazed panels, new timber doors, glazed entrance panel, and render at ground floor level. Installation of roof lights to front roof slope. GRANTED 30/07/2013.
- 28 90-92 Blackfriars Road: 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 767 sqms of office floorspace (Use Class B1), disabled parking spaces and roof top landscaped amenity areas. (ref: 12/AP/3558 - GRANTED - 04/06/2013)
- 29 12 Valentine Place - 13/AP/0793 - Change of use from Use Class B8 (storage) with ancillary B1 (office) and B2 (light industrial) to Use Class B1 (office). GRANTED – 14/05/2013.
- 30 102-107 Blackfriars Road (known as 'One Valentine Place') - 07/AP/0962: a new part three, part four and part seven storey building containing offices (Use Class B1) on the upper floors and a shop (Use Class A1) and offices (Use Class B1) on the ground floor, and installation of biomass boiler including flue extracting at roof level and solar photovoltaic equipment at roof level. GRANTED 07/12/2010.
This building was recently completed, and would immediately adjoin the proposal site.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

- 31 The main issues to be considered in respect of this application are:
 - a) The principle of the development in terms of land use and conformity with the development plan;
 - b) The re-provision of office space and the impact on the office supply pipeline;

- c) The impact on the residential, visual and heritage amenity of the area including the impact on the Valentine Place Conservation Area;
- d) Quality in design, including the impact on public realm
- e) Quality of residential accommodation, housing mix, density and the provision of affordable housing;
- f) Transport impacts;
- g) Flood risk and sustainable development implications;
- h) Planning obligations;
- i) All other relevant material planning considerations.

Planning policy

Core Strategy 2011

- 32 Strategic Targets Policy 1 - Achieving growth
- Strategic Targets Policy 2 - Improving places
- Strategic Policy 1 - Sustainable development
- Strategic Policy 2 - Sustainable transport
- 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 businesses
- Strategic Policy 11 - Open spaces and wildlife
- Strategic Policy 12 - Design and conservation
- Strategic Policy 13 - High environmental standards
- Strategic Policy 14 - Implementation and Delivery

Southwark Plan 2007 (July) - saved policies

- 33 The Council's cabinet on 19th March 2013, as required by para 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.
- 34 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 3.2 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 3.15 - Conservation of the Historic Environment
Policy 3.16 - Conservation Areas
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 4.1 Density of Residential Development
Policy 4.2 Quality of Residential Development
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 5.6 Car Parking
Policy 5.7 Parking Standards for Disabled People and the Mobility Impaired

London Plan July 2011 consolidated with revised early minor alterations October 2013

- 35 Policy 2.5 Sub-regions
Policy 2.9 Inner London
Policy 3.1 Ensuring equal life chances for all
Policy 3.3 Increasing housing supply
Policy 3.4 Optimising housing potential
Policy 3.5 Quality and design of housing developments mayors flat sizes set out
Policy 3.6 Children and young people's play and informal recreation facilities
Policy 3.8 Housing choice
Policy 3.10 Mixed and balanced communities
Policy 3.11 Definition of affordable housing
Policy 3.12 Affordable housing targets
Policy 3.13 Negotiating affordable housing on individual private residential and mixed use schemes
Policy 4.1 Developing London's economy
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 5.9 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 5.15 Water use and supplies
Policy 5.18 Construction, excavation and demolition waste
Policy 5.21 Contaminated land
Policy 6.1 Strategic approach (Transport)
Policy 6.2 Providing public transport capacity and safeguarding land for transport
Policy 6.3 Assessing transport capacity
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 Building London's neighbourhoods and communities
 Policy 7.2 An inclusive environment
 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 noise and enhancing soundscapes
 Policy 7.21 Trees and woodlands
 Policy 8.2 Planning obligations
 Policy 8.3 Community infrastructure levy

National Planning Policy Framework (NPPF)

- 36
- Section 1: Building a strong, competitive economy
 - Section 2: Ensuring the vitality of town centres
 - Section 4: Promoting sustainable development
 - Section 6: Delivering a wide choice of high quality homes
 - Section 7: Requiring good design
 - Section 8: Promoting healthy communities
 - Section 10: Meeting the challenge of climate change, flooding and coastal change
 - Section 11: Conserving and enhancing the natural environment
 - Section 12: Conserving and enhancing the historic environment

Relevant SPD's/SPG's

- 37
- Section 106 Planning Obligations SPD July 2007
 - Design and Access Statements SPD September 2007
 - Sustainable Transport Planning SPD September 2008
 - Residential Design Standards SPD October 2011
 - Affordable Housing SPD September 2008
 - Draft Affordable Housing SPD June 2011
 - Sustainable Design and Construction SPD February 2009
 - Sustainability Assessment SPD February 2009
 - Draft Bankside, Borough and London Bridge SPD February 2010
 - Blackfriars Road SPD January 2014
 - Housing SPG 2012 (SPG to the London Plan)
 - Providing for Children and Young People's Play and Informal Recreation 2008 (SPG to the London Plan)

Principle of development, policy and land use

Policy Designations

- 38
- The National Planning Policy Framework (NPPF) was published on 27 March 2012. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development to deliver homes.
- 39
- The NPPF promotes the delivery of a wide choice of high quality homes, seeks to widen opportunities for home ownership and create sustainable, inclusive and mixed communities. It encourages the effective use of land by reusing land that has been previously developed and also promotes mixed use developments. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

Opportunity area

- 40 London South Central is a strategic regeneration priority area identified in the London Plan. It stretches across the northern part of three boroughs of central London south of the Thames (Southwark, Lambeth, and Wandsworth) and contains four Opportunity Areas, one of which is the Bankside, Borough and London Bridge Opportunity Area within which the application site is located.
- 41 Policy 2.13 of the London Plan states that developments within Opportunity Areas in London should:
- support the strategic policy directions for the opportunity areas and intensification areas;
 - seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses;
 - contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity;
 - realise scope for intensification associated with existing or proposed improvements in public transport accessibility, such as Crossrail, making better use of existing infrastructure and promote inclusive access including cycling and walking; and
 - support wider regeneration (including in particular improvements to environmental quality) and integrate development proposals to the surrounding areas.

Central Activities Zone (CAZ) and Borough and Bankside District Town Centre

- 42 The site is located within the CAZ which covers a number of central boroughs and covers London's geographic, economic, and administrative core. Strategic Targets Policy 2 - Improving Places of the Core Strategy states that development in the CAZ will support the continued success of London as a world-class city as well as protecting and meeting the more local needs of the residential neighbourhoods. It also states that within the CAZ there will be new homes, office space, shopping and cultural facilities, as well as improved streets and community facilities.
- 43 In addition, the site is part of the Borough and Bankside District Town Centre where saved policy 1.7 of the Southwark Plan states that within the centre, developments will be permitted providing a range of uses, including retail and services, leisure, entertainment and community, civic, cultural and tourism, residential and employment uses. Strategic Policy 3 of the Core Strategy advises that the network of town centres will be maintained and that at Borough and Bankside district town centre, the Council will support the provision of new shopping space.

Blackfriars Road SPD 2014

- 44 The council adopted the above SPD earlier this year. Due to the scale of growth proposed along Blackfriars Road, the SPD has been adopted to ensure that development takes place in a coordinated way and that Blackfriars Road reaches its potential as a destination with its own identifiable character and identity. The SPD states that opportunities to increase the amount and type of development will be maximised, particularly opportunities for flexible innovative business space and office accommodation. Cultural, leisure, arts and entertainment uses will also be encouraged which will benefit local residents and help make Blackfriars Road a destination, linking to the many cultural facilities along the South Bank, The Cut and at Waterloo. Social and community infrastructure will continue to be improved where opportunities arise as part of mixed use developments. There is also the intention to work with Network Rail to refurbish space under railway arches to provide a range of uses including small businesses, shops, cafes and restaurants. The SPD goes on to state that there will also be many new homes on the upper floors of commercial developments, offering a range of housing types and sizes.

Conclusion on policy designations

- 45 The principle of a development containing a mix of uses including retail, offices and residential would support the role and functioning of the Central Activities Zone and the Borough and Bankside District Town Centre as well as being consistent with the policies for the Opportunity Area. The acceptability of each of the individual uses is considered below.

Land use considerations

Office space

- 46 As detailed above, the site falls within the CAZ, which contains almost a third of all London jobs. The London Plan does not protect office floorspace in the CAZ, it simply identifies office use as an appropriate land use in the CAZ.
- 47 Core Strategy Strategic Policy 10 Jobs and Businesses states that the council will increase the number of jobs in Southwark and create an environment in which businesses can thrive. The policy goes on to state that existing business floorspace would be protected and the provision of around 400,000sqm-500,000sqm of additional business floorspace would be supported over the plan period in the Bankside, Borough and London Bridge Opportunity area to help meet central London's need for office space.
- 48 Saved Policy 1.4 Employment sites outside the Preferred Office Locations and Preferred Industrial Locations is also relevant, and states that development will be permitted provided that the proposal would not result in a net loss of floorspace in Class B use. An exception to this may be made where:
- a) The applicant can demonstrate that convincing efforts to dispose of the premises, either for continued B Class use, or for mixed uses involving B Class, including redevelopment, over a period of 24 months, have been unsuccessful; or
 - b) The site or buildings would be unsuitable for re-use or redevelopment for B Class use or mixed use, having regard to physical or environmental constraints;
 - c) The site is located within a town or local centre, whereby suitable Class A or other town centre uses will be permitted in the place of Class B uses.
- 49 In this case, the buildings are occupied, and the site is suitable for continued Class B use. The existing total B class floorspace equates to 4225.8sqm gross internal area (GIA) with a proposed re-provision of 3853.6sqm GIA of B1 space, resulting in a shortfall of 372.2sqm of B1 floorspace. Policy 1.4 allows for retail space to be provided in lieu of B Class floorspace where the site lies within a town centre. In this case, 138.4 sqm of retail space is being provided at ground floor level, which effectively reduces the loss of commercial floorspace to 233.8sqm.
- 50 The applicant has argued that the existing floorspace is inefficient in terms of layout, which reduces the useable area and the number of workers who could be accommodated in the space. When comparing the existing usable area measured in terms of net internal area (2790.8sqm NIA) with the proposed re-provision (2791.3sqm NIA including the A1-A3 floorspace) the overall re-provision of commercial floorspace the shortfall equates to only 0.5sqm.
- 51 In terms of job creation, the existing uses on site employ in the region of 54 people whereby the improved office space will have the capability of providing approximately 172 full time equivalent posts. As such, whilst it is acknowledged that there is a loss of employment floorspace when considering GIA measurements, the reprovided Class B floorspace will provide a similar net area, and be an improved and more efficient,

cohesive space with the potential to increase the employment opportunities on the site in comparison to the existing Class B floorspace.

Retail provision

- 52 The development would include new retail units (A1-A3) at ground floor level of Blocks B and D. In total, 138.4sqm of retail floorspace is proposed, which would help to offset some of the office reduction under Saved Policy 1.4. The provision of new town centre uses such as retail is supported by saved Southwark Plan Policy 1.7 since the site lies in a town centre.
- 53 The retail units would activate the ground floor of the development at Valentine Place and the corner of Valentine Row/Webber Street, serve the proposed increase in population and contribute to the vitality and viability of the district town centre. The site currently has no active frontages or retail space whereas the proposal would create a much more attractive and vibrant street environment. There are also opportunities to provide tables and chairs in the new public space created between the proposed office building and One Valentine Place. The amount and scale of provision is considered to be acceptable and would help to meet the needs of residents and workers in the area subject to conditions to manage hours of use.

Housing

- 54 The proposed development comprises 62 new homes. The provision of residential accommodation is supported by the London Plan, the saved Southwark Plan and the Core Strategy.
- 55 London Plan Policy 3.3 Increasing Housing Supply sets a minimum target of 20,050 additional homes to be provided in Southwark over a period from 2011-2021. Strategic Policy 5 of the Core Strategy seeks high quality new homes in attractive environments. It states that development will provide as much housing as possible whilst also making sure that there is enough land for other types of development. The policy sets a target of 24,450 net new homes between 2011 and 2026. A key objective is to provide as much new housing as possible and create places where people would want to live. In addition, saved Policy 1.4 of the Southwark Plan supports the provision of additional floorspace in town or local centres for residential use.
- 56 The proposed 62 new residential units would contribute towards meeting an identified housing need and accords with local, regional and national policy priorities. Issues relating to the quality of accommodation, and affordable housing, are discussed further below.

Conclusion on land use

- 57 The proposal involves a small reduction in Class B gross floorspace, however, the current space is considered to be out dated and unsuited to meet modern requirements and the replacement building (Block D) provides high quality modern office space with active ground floors. As such, the minor loss of Class B space is acceptable since it facilitates the provision of a mixed use scheme including new housing. The proposed development includes a mix of uses that are considered to be appropriate for the sites location within the CAZ, Opportunity Area and town centre. As well as the retail and B Class floorspace it will provide a significant number of new homes in a sustainable location which is a priority of the current Government as well as local and London-wide planning policies.

Environmental impact assessment

- 58 The proposed development lies outwith the scope of the Town and Country Planning Environmental Impact Assessment Regulations 2011. Whilst a formal Screening

Opinion was not sought, the development is not considered to constitute EIA development, based on a review of the scheme against both the EIA Regulations 1999 and the European Commission guidance. The applicants did not seek a formal Screening Opinion however the proposed development would not be likely to have significant effects upon the environment by virtue of factors such as its nature, size or location, and therefore an EIA would not be required.

Affordable housing

- 59 The proposal is to provide a total of 19 affordable units which would be broken down as follows;

	Affordable Rent	Intermediate	Total
1 Bedroom	6 (4W)	2	8
2 Bedroom	6 (2W)	4	10
3 Bedroom	1		1
Total	13	6	19

Policy context

- 60 *National*
The NPPF adopted in March 2012 states that local planning authorities should set policies for affordable housing need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.
- 61 *Regional*
Policy 3.8 of the London Plan requires new developments to offer a range of housing choices and the provision of affordable family housing. Policy 3.12 states that the 'maximum reasonable amount of affordable housing should be sought' having regard to a number of factors including "the need to encourage rather than restrain residential development, the need to promote mixed and balanced communities, and the specific circumstances of individual sites". The policy also advises that "Negotiations on sites should take account of their individual circumstances including development viability, the availability of public subsidy, the implications of phased development including provisions for re-appraising the viability of schemes prior to implementation..."
- 62 *Local*
Policy SP6 of the Core Strategy requires as much affordable housing as is financially viable, and specifically a minimum of 665 affordable units within the Bankside, Borough and London Bridge Opportunity Area between 2011 and 2026. A minimum of 35% affordable housing provision is required.
- 63 Policy 4.4 of the Southwark Plan requires provision of 40% affordable housing on developments within the CAZ however this is superseded by SP6 of the Core Strategy and as such 35% provision is required. Saved Policy 4.4 and the Affordable Housing SPD specifies that this provision should be split by tenure; 70% social rented & 30% intermediate. The policy requires that, in the calculation of affordable housing, any room in a dwelling which has a floor area over 27.5 sqm should count as two habitable rooms.
- 64 Using this methodology, the full development proposal provides 255 habitable rooms and at 35% provision (minus six habitable rooms as a result of providing six affordable wheelchair accessible dwellings) a policy compliant affordable provision would equate to 83 habitable rooms or 32.5%. The proposed affordable provision is 19 units (13 affordable rent and six shared ownership/intermediate) with an overall affordable

habitable room provision of 68 which equates to 26% affordable housing being proposed on site, a shortfall of 25 habitable rooms. At 26% the level of affordable housing proposed is well below the level set by Policy 4.4 of The Southwark Plan and SP6 of The Core Strategy. The applicant has submitted a detailed financial appraisal to demonstrate that a scheme providing 35% (32.5% with the wheelchair units being discounted) affordable housing would be unviable.

- 65 The viability assessment makes the argument that an increased level of affordable housing would be unviable due to the high existing use value of the current site. The viability assessment was reviewed by the Council's Property Team who considered that the original offer fell well short of what could potentially be provided by the scheme which resulted in further negotiations to seek an improved offer. Due to the number of areas of disagreement between the Council's Valuer and the applicant, the Council sought an independent assessment from valuation specialists BNP Paribas. This concluded that the development was capable of supporting additional affordable housing. In response the applicant increased the number of affordable rent units and provided an additional two shared ownership units to increase the overall offer from 18% to 26%. The shared ownership units would be provided in line with Southwark Council's affordability criteria whilst the affordable rent units would be capped at Local Housing Allowance Levels for one and two bed units with the three bed unit being at target rent.
- 66 In addition to this the applicant is also proposing to provide a £500,000 in lieu payment towards the Council's Direct Delivery programme to help fund additional off-site affordable housing. This payment will equate to an additional five habitable rooms, bringing the overall affordable total to 73 habitable rooms and an overall provision of 28%. The Council's Property Team and the external consultants who verified the viability assessment are in agreement that this is the maximum that can reasonably be sustained by the site. It would normally be expected that all affordable housing would be delivered on site. However, in this case the inclusion of an additional 5 habitable rooms would require a substantial re-design of the scheme in order to accommodate all of the affordable housing within separate cores. Given the advanced stage of the application, and the relatively small number of rooms, this is not considered to be reasonable, and would delay determination and delivery of the project. Similarly, off-site delivery would be problematic for this small number of rooms (equivalent to one or two units), and would delay the scheme. As such, it is considered reasonable to define this as an 'exceptional' case, and accept an in lieu payment which would contribute to the Direct Delivery programme of new Council homes.

Conclusion on affordable housing

- 67 The affordable housing offer of 28% made up of 26% on-site and a further 2% through an in lieu payment is considered acceptable in this case. The viability assessment has been scrutinised by the Council's Property team, and an additional external opinion has concluded that this is the most that the development could reasonably support whilst remaining viable. As such, the proposal would meet the requirements of the NPPF, and the London Plan and Core Strategy policies which acknowledge viability as a material consideration in relation to affordable housing. Potentially more affordable housing could be delivered on this site if there was a greater quantum of development overall, however due to the character of the conservation area, a more modest scale is appropriate to respect the existing context. This, together with the high existing use value, has resulted in a scheme with a lower level of affordable being acceptable in this case.

Housing mix and density

- 68 Strategic Policy 7 of the Core Strategy expects 60% of units within a development to have more than two bedrooms, and in this area at least 20% to have 3, 4, or 5

bedrooms.

- 69 Saved Policy 4.3 of the Southwark Plan requires a mix of dwellings sizes and types to be provided within major new developments in order to cater for a range of housing needs. At least 10% of the units should be suitable for wheelchair users. The mix of units provided is shown in the table below;

	Market Housing	Affordable Rent	Intermediate	Total
1 Bedroom	4	6 (4W)	2	12 (20%)
2 Bedroom	20	6 (2W)	4	30 (49%)
3 Bedroom	14	1	14	14 (23%)
4 Bedroom	5			5 (8%)
Total	43	13	6	62

- 71 80% of units would have two or more bedrooms; this exceeds the 60% target and is a positive aspect of the scheme. 32.5% of the units would have three or more bedrooms, again significantly exceeding the 20% target, which is another positive aspect of the scheme. However it is noted that only one of the larger units is provided as affordable housing.
- 72 In terms of wheelchair accommodation, 10% (6 units) would be provided. The units would be provided in Block B in the form of 4 one bedroom and 2 two bedroom apartments, all affordable rent tenure. The quantum of wheelchair unit provision is considered acceptable although it is noted that the majority is provided as one bedroom units for which demand is more limited.
- 73 Policy 3.4 Optimising Housing Potential of the London Plan states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the Plan. It also requires local context, the design principles and public transport capacity to be taken into account. Strategic Policy 5 - Providing new homes of the Core Strategy sets out the density ranges that residential and mixed use developments would be expected to meet. As the site is located within the Central Activities Zone, a density range of 650 to 1100 habitable rooms per hectare would be sought. Appendix 2 of the Saved Southwark Plan sets out guidance for how density should be calculated. In order for a higher density to be acceptable, the development would need to meet the criteria for exceptional design as set out in section 2.2 of the Residential Design Standards SPD.
- 74 The development will provide 205 actual habitable rooms. Additionally 150 habitable room equivalents are being provided based on the commercial floorspace. This equates to 355 habitable rooms being provided on a 0.34 hectare site giving a density of 1044 habitable rooms per hectare. This is within the range expected for the Central density zone, and is therefore considered acceptable.

Quality of accommodation

Unit size and aspect

- 75 Saved Policy 4.2 of the Southwark Plan advises that planning permission will be granted provided the proposal achieves good quality living conditions. The adopted standards in relation to internal layout are set out in the adopted Residential Design Standards SPD 2011. The following table sets out the minimum flat size requirements as set out in the Residential Design Standards 2011, and also the flat sizes that would be achieved.

Unit Type	SPD minimum sqm	Size range proposed (sqm)
1 Bedroom	50	50.6 - 76.7

2 Bedroom	61 - 70	66.2 - 103.8
3 Bedroom	74 - 95	96.5 - 202.2
4 Bedroom (house)	106-113	181.9

77 The flat sizes comfortably exceed the standards as set out in the SPD. In terms of aspect, 89% of the units would be dual aspect which is positive. Space has been allocated for storage and all kitchens enjoy natural light and ventilation. Overall, it is considered that the flat sizes are acceptable, and would provide for a very good standard of internal amenity.

Amenity space and children's play space

78 All new residential development must provide an adequate amount of useable outdoor amenity space. The Residential Design Standards SPD sets out the required amenity space standards which can take the form of private gardens and balconies, shared terraces and roof gardens. Policy 3.6 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children's play areas should be provided at a rate of 10 sqm per child bed space (covering a range of age groups).

79 In terms of the overall amount of amenity space required, the following would need to be provided:

- For units containing 3 or more bedrooms, 10sqm of private amenity space as required by the SPD;
- For units containing 2 bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal gardens;
- 50sqm communal amenity space per block as required by the SPD; and
- 10sqm of children's play space for every child space in the development as required by the London Plan.
- New dwellings (houses) require 50sqm.

80 In the proposed scheme, 12 units will not be provided with any private amenity space. This includes 8 one bedroom units, 3 two bedroom units and one three bedroom unit. All will have access to the communal amenity courtyard, although two of the units would not have access directly from within their core. Where the full recommended provision of 10sqm per residential unit has not been provided, the shortfall has been added to the communal requirement.

81 The provision of private amenity space is a key aspect of providing attractive and high quality homes, and failure to provide private balconies or terraces would not be acceptable unless clear justification can be made. In this case, 8 of the units sit behind the retained or extended Maltina Bakery facade, and are single aspect units which do not benefit from a face on the courtyard elevation. The introduction of balconies onto the retained facade would be damaging to its historic character, and external balconies would appear incongruous here, as well as being potentially overbearing within the narrow street. As such, the lack of balconies to these units is acceptable on balance. In the case of the other four units, the justification is less clearcut however within the context of the overall scheme, is considered acceptable on balance.

82 The proposed three storey terraced dwellings have front gardens measuring 13.1sqm, rear gardens measuring 17.6sqm and terraces measuring 11.3sqm resulting in a private amenity provision of 42.9sqm. In the context of this central London location this is considered to be a reasonable provision, and the shortfall of 7.9sqm for each of these units will be added to the communal amenity space requirement.

83 Of the remaining 44 dwellings, one of the two bed units has two balconies both with less than 3sqm which will not count towards private amenity space and 23 have

balconies in the range of 4.9sqm - 9.9sqm and the shortfall will be added to the communal amenity space figure. The number of small balconies, particularly for the larger or wheelchair units is a shortcoming of the overall scheme. The remaining 21 units have balconies/terraces in the range of 10sqm - 98.5sqm.

- 84 Overall the provision of private amenity space is considered acceptable on balance only because of the mitigating factor of the retained Maltina facade, and the shared access to a large and attractive communal courtyard. Only one large family dwelling lacks access to private amenity space and this unit has an internal floorspace of 202.2sqm and as such the lack of private amenity space can be balanced against the generosity of the unit and the constraints of its location within the corner of the retained facade of the Maltina Bakery building.
- 85 In terms of communal amenity space the development will provide an enclosed residents' landscaped courtyard measuring approximately 900sqm. In policy terms 50sqm of communal amenity space is required per block which will equate to 250sqm. Additionally the shortfall of the private amenity space equates to 262.7 which would require an overall communal amenity space provision of 512.7sqm. As such the provision of 900sqm of communal amenity space is welcomed. The courtyard space could encourage the creation of a strong community on the site, and has space for childrens play.
- 86 The proposed development provides the equivalent of 19 child bed spaces which will require 190sqm of childrens play space. Within the communal courtyard, 211sqm of childrens play space has been allocated which is policy compliant and accordingly this is a positive aspect of the scheme.

Design and site layout

Policy context

- 87 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."
- 88 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."
- 89 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.
- 90 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." When we review the quality of a design we consider the appropriateness of the fabric, geometry and function as well as the overall concept for the design relative to the site.

Site location

- 91 The site is effectively an island block with thoroughfares on three sides. Valentine Place is a narrow, characterful route leading off the Blackfriars Road and flanked by traditional warehouse buildings which have been converted to provide high quality commercial floor space. Webber Row is a busier link and is flanked to the south by the Grade II listed Peabody Estate buildings at the boundary of Southwark and Lambeth. The site is a key element of the Valentine Place conservation area, and the issues

around the demolition of much of the existing fabric, and the impact of the new buildings on the character of the conservation area, are set out at paragraphs 101-113 below.

Design

92 *Block A*

The existing building 7-19 Valentine Place and 21 Webber Street makes a significant contribution to the conservation area and it is right that this proposal seeks to retain its most significant features, namely the facades on Valentine Place and Webber Street. The existing building was considered for listing by English Heritage and rejected. However, its status as a designated heritage asset is established in the NPPF and its loss would be considered as 'substantial harm'. In this case, given that there is little of historic interest beyond the facades which are to be retained, the proposal involves less than substantial harm and can be considered under the requirements of paragraph 134 of the NPPF which states: "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use."

93 In this case, the proposed amendments introduce a modern sustainable use behind the retained facade to provide high quality residential accommodation. The former bakery building's modest part two/part three storey scale is complimented with a new attic storey in masonry construction which will match the existing terracotta facade with a further set-back attic storey designed as a recessive glazed roof-top feature. All the main entrances and windows are utilised appropriately and a mix of residential units introduce a more efficient floor plate to replace the deep window-less space of the previous industrial building, thereby balancing the modern needs of residential accommodation within the retained facade.

94 *Block B*

This block announces the scheme from the eastern approach on Webber Street and includes a small retail unit at its base. It is modest in scale at just four storeys in height and reflects the historic setting of the Peabody Estate across the way. Its design echoes the aesthetic of the historic buildings on Valentine Place with brick facades and deeply recessed windows of multi-pane metal framed design. Its location is important to the development and its scale is appropriate at the entrance to the narrow Valentine Row - a narrow yard that leads back to Valentine Place along the eastern edge of the site.

95 *Block C*

Valentine Row is a narrow intimate space that has suffered from inappropriate design which turns its back onto the pedestrian thoroughfare. Yards like this are characteristic of the area and show up on some of the earliest maps of the area. The proposal introduces a short terrace of three-storey houses facing onto Valentine Row behind narrow front gardens. This helps to introduce a finer grain to this development and responds appropriately to the modest proportions and intimate scale of this important but neglected thoroughfare. The aesthetic of the houses is appropriate and rooted in the character of the area with brick facades and punched windows establishing a rhythm and proportion to this frontage.

96 *Block D*

The office building is located a short distance back from the Blackfriars Road frontage and is set at six storeys in height to reflect a more subservient relationship to the recently completed 'One Valentine Place' which is one storey taller. The block has been designed to maximise active frontages at the base with retail units and the main entrance lobby and a route to the landscaped courtyard. The building is aligned with

the 'One Valentine Place' scheme to create a small public space between these two buildings and in this way creates a fitting termination to Valentine Passage. In its architectural design it reflects the character of the conservation area and uses brick-facing with deep-set metal-framed windows and a stepped profile with high-level terraces. The result is a highly modulated robustly detailed modern re-interpretation of the existing warehouse buildings on Valentine Place.

97 Southwark Councils Design Review Panel viewed an earlier version of the scheme at pre-application stage in April 2013. In conclusion, the Panel welcomed the holistic approach of the proposal and the comprehensive re-development of this important site. They welcomed the perimeter block approach, the mix of uses and the emphasis on landscape. Concerns were raised over the ambiguity between public and private spaces and potential new routes, the architectural expression of the Valentine Row/Webber Street and Valentine Place buildings and the nature and the detailed resolution of certain aspects of the design. They encouraged the architects to resolve these concerns and to make the necessary adjustments to their design before they submit a planning application on this site. The Panel believed that the scheme had potential for an excellent addition to the city but required a more rigorous approach to the function and the identity of each of the sub-components making the overall block more coherent.

98 Following the Design Review Panel comments, the architects have worked to reduce the ambiguity between public and private space with a clear delineation between residents space and public realm. Further improvements have been undertaken to the design approach of the Valentine Row/Webber Street and Valentine Place buildings to further refine their character and improve the quality of the design which will be reinforced by high quality materials and finishes. It is considered that the concerns of the DRP have been sufficiently addressed.

99 *Courtyard*

The landscaped court at the centre of the site is one of the most important features of this proposal. There are two points of entry/exit for residents which offer routes across the site and a landscaped space to sit away from the busy streets that surround the site. The court is encircled by lower buildings to the south and higher buildings to the north to maximise sunlight penetration and it is generously proportioned to ensure that it can be used throughout the year. At its edges the courtyard includes some private residential amenity spaces for the houses on Valentine Row and the units in the former bakery.

Conclusion on design

100 In conclusion, the proposal is for a high quality urban and architectural design that transforms this former industrial site at the heart of a conservation area. Despite the concerns raised by English Heritage it is considered that the architectural expression is both robust and confident and reflects the historic context of this important site, both retaining the key historic facade and using heights which are appropriate to the context and not overbearing on the townscape. Due to the size of the site, this comprehensive development will make up a significant proportion of the designated conservation area when it is completed. As such the quality of architectural and urban design will need to follow through to the construction of this scheme, its quality of architectural detailing, landscaping and materials all of which should be reserved by condition.

Heritage impacts

Policy context

101 Paragraph 128 of the NPPF states: "Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a

proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal."

- 102 Paragraph 134 of the NPPF states: "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use."
- 103 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".
- 104 Saved policy 3.16 seeks to protect conservation areas by managing development effectively to safeguard the character and setting of heritage assets through the use of high quality design and materials and the retention of original features.
- 105 *Valentine Place Conservation Area*
The conservation area appraisal describes the historic significance of the site including its characteristic mix of offices and light industrial uses. The area around Pontypool Place immediately to the north of the site offers pedestrian permeability across the area and make a positive contribution to the significance of the conservation area. The appraisal notes that the setting of the conservation area extends to Blackfriars Road to the east, takes in the Peabody Estate to the south and includes the corner of Barons Street and Webber Street. As a comprehensive scheme within a conservation area this proposal has to demonstrate how it will conserve or enhance the character and appearance of the conservation area, its historic significance and its setting. Harm to the significance should be avoided and where necessary should be justified appropriately in accordance with the requirements of paragraphs 132 or 133 of the NPPF.
- 106 7-19 Valentine Place/21 Webber Street, also known as Maltina Bakery, is described in the conservation area appraisal which notes its important contribution and states that the building "contrasts with the utilitarian industrial buildings of the majority of the conservation area. Built c.1910 for the Maltina Bakery Company in the Edwardian neo-classical style. The building is yellow brick with golden terracotta dressings and occupies the site on the corner of Valentine Place and Webber Street. The corner of No. 21 is canted, although the original openings have been in-filled, the others survive on Webber Street and Valentine Place. On the Valentine Place elevation the central loading bay with timber flaps and bracketed canopy and a steel crane jib has been retained. The roof is concealed behind a moulded terracotta coping. The classical pediments, projecting hoods, timber doors, sash windows and chimneys stacks and pots are all a feature of the building, which makes a positive contribution to the conservation area and wider environs."
- 107 The nearest listed buildings are the Grade II listed bollards located in Pontypool Place and the recently listed Friends of Temperance Building on Blackfriars Road. Both of these nationally important structures are unaffected by this proposal and there is no impact on their historic setting due to their separation from the site.
- 108 The conservation area appraisal offers guidance for new development and states that: "It is important that the overall form of the development remains in keeping with the morphological characteristics of the area. The urban form of the conservation area is

key to its character and any change must consider the basic principles that have determined it. As the appraisal discusses, the street pattern dates from the 18th century and the buildings largely from the late 19th century/ early 20th century. The urban structure is typified by narrow street blocks and relatively long frontage buildings."

- 109 The significance of the conservation area lies in its industrial heritage, the commercial buildings and warehouses accessed directly off the narrow lanes and streets that are typical of the area. The application property includes two large warehouse sheds of recent construction and former bakery building at the corner of Webber Row and Valentine Place which is noted in the appraisal and contributes positively to the character and appearance of the conservation area. The proposal seeks to remove the warehouse sheds at the centre of the site as well as a number of high perimeter walls. In relation to the bakery building the scheme seeks to retain its facade and a few internal features and to introduce new construction behind the facade to preserve its contribution to the Conservation Area. The bakery building retains its original finely detailed facade but is much altered internally and was rejected for listing by English Heritage. However, as a positive contributor to a conservation area it is considered as a designated heritage asset under the NPPF and its complete loss would require further justification.
- 110 In the main, the proposed demolition is restricted to the large warehouse sheds and walled enclosures which are largely inward looking and encircle the site with high windowless walls. The loss of the mid-late 20th century warehouse sheds and perimeter walls is considered less than substantial harm to the significance of the conservation area. The adopted conservation area appraisal defines the significance of the area and states in paragraph 3.1.1: "*This is a cohesive townscape comprising of mainly industrial and warehouse developments from the late 19th and early 20th centuries. The historic street layout remains, creating a legible and permeable environment. The intimate scale and high quality and architecturally interesting frontage developments of two to four storeys, have survived largely intact. This is a highly urban environment with little in the way of soft landscaping.*"
- 111 Paragraph 134 of the NPPF states that: "*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.*" Accordingly, when considering the harm to the significance of the conservation area and balancing that harm against the benefits of the scheme including the retention of the most significant heritage asset; introducing appropriate and high quality development with a mix of uses, and active highly articulated frontages where there were once tall boundary walls. As such, the proposal is considered to comply with the requirements of the NPPF in terms of demolition, and the less than substantial harm can be justified. The detailed objection received in relation to the demolition is noted, however officers are satisfied that the proposals are in accordance with the expectations of the NPPF and local policies, and the development overall would positively enhance the conservation area. However, since the planning permission would give consent for the demolition of buildings in a conservation area, it is recommended that a condition be imposed to eliminate the risk of a delay between demolition and rebuilding, to avoid creating an unsightly 'gap' in the conservation area.
- 112 This proposal reflects the principles set out in the conservation area appraisal. The design is highly articulated, with robust architectural expression and strong urban frontages that reinforce the intimate scale of the streets and pedestrian thoroughfares. It preserves the significance of the conservation area by retaining the facade of 21 Webber Street and, as noted above, responds uniquely to each street frontage with larger buildings on Valentine Place and a lower terrace of houses on Valentine Row.

Conclusion on heritage

- 113 In conclusion, the proposal compliments its historic setting and enhances the Valentine Place Conservation Area. It distributes height and massing across the site appropriately and includes active frontages, a significantly improved permeability across the site and an appropriate hierarchy of public space. The scheme proposes an appropriate and restrained palette of materials that respects the character, appearance and the setting of this important conservation area. The retention of the key historic facade of the Maltina Bakery is a positive aspect of the scheme. The remaining buildings do not make a significant contribution to the conservation area and will be fully demolished. Their loss is not considered to have a detrimental impact on the Conservation Area, the character of which will be both protected and enhanced by the proposed development.

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

Daylight

- 114 A daylight and sunlight report has been submitted as part of the Environmental Statement. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
- 115 The BRE sets out three detailed daylight 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 their original value before the loss is noticeable.
- 116 The second method 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 20% in the area of sky visibility, daylight may be affected.
- 117 Another method of calculation is the Average Daylight Factor (ADF) which is a more detailed assessment and considers the amount of sky visibility on the vertical face of a window, but also the window size, room size and room use. The recommendations for ADF in dwellings are 2% for kitchens, 1.5% for living rooms and 1% for bedrooms. The BRE recommends that whilst ADF is an appropriate measure for new buildings and master planned areas, VSC/NSL should be principally used to assess impact on existing buildings.
- 118 The daylight and sunlight assessment on five key buildings that lie adjacent to the application site and these include Quentin House, 6 Barons Place (Flats 1-6), 2-8 and 34-36 Webber Row, The Crown Public House and Bridgehouse Court at 109-115 Blackfriars Road. The commercial properties at One Valentine Place, 2-10 and 12-14 Valentine Place and the Primary Education Language Centre on Webber Street have not been assessed due to their nature as commercial properties.
- 119 *Quentin House*
The VSC results for Quentin House demonstrate that all but two of the windows assessed at ground and first floor will meet the minimum requirements of the BRE. The two windows that do not meet the minimum BRE guidelines are on the ground floor and are situated under recessed balconies with a reduction of 22% which is just above the BRE recommended limit of a 20% reduction. The BRE guidelines note that if the VSC reduction without the balconies in place would be less than 20% then it is

the balcony as opposed to potential development that is the reason for the larger reduction. In this case the assessment to the windows without the balconies in place show a reduction of less than 20% VSC indicating that the balconies are the primary reason for the reduced VSC. In terms of the No Sky Line assessment, two of the 28 rooms surveyed would fail to meet the guidelines however these rooms will have adequate VSC to ensure sufficient daylight. As such 89% of the rooms at Quentin House are compliant in relation to NSL.

120 *6 Barons Place*

The VSC and NSL results for Barons Place show that all of the windows meet the minimum BRE guidelines.

121 *2-8 and 34-36 Webber Row*

There is only one window to the flank elevation of this building that faces towards the proposed development site. The windows facing away from the development site have not been considered as the impact will be minimal. The VSC results show that the flank window will experience a small reduction in daylight however the reduction is well within the limits of the BRE guidelines and as such the impact on daylight will not be significant.

122 *The Crown Public House*

The Crown Public House has residential accommodation on the upper floors (second and third). The VSC assessment shows that all windows will meet the minimum BRE guidelines.

123 *Bridgehouse Court 109-115 Blackfriars Road*

This building is an enclosed car park on the ground floor with two levels of residential accommodation above. The VSC results show that the second floor windows will generally continue to receive good levels of daylight with only two of the windows having VSC reduced to below 27%. The results show that these windows will experience a reduction from 37.71% to 25.1% and 37.96% to 26.39% respectively. It is noted that the reduction is more than 20% (33% and 30% respectively) largely as a result of the high VSC levels previously enjoyed. In a densely urbanised environment like the Central Activities Zone a VSC of 25.1% and 26.39% is considered acceptable.

124 The VSC results for the first floor windows demonstrates that all windows facing the development site will experience a loss of VSC to a level below 27% (range 16.91% to 22.35%) with reductions in the range of 40% - 53%. Unlike the results for the second floor windows, these reductions are more likely to be noticeable by current occupiers. In situations like this it is appropriate to consider a 'mirror test', No Sky Line test and the Average Daylight Factor.

125 *Bridgehouse Court mirror test*

The BRE guidelines suggest methods of assessing an alternative benchmark VSC based on a buildings location and its relationship to a proposed development site in order to determine if the affected building is considered a "bad neighbour" in daylight terms. The most appropriate method in this case is a 'mirror test' whereby the VSC that would be experienced by the surrounding windows is calculated assuming a building of the same size, shape and relationship to the boundary as Bridgehouse Court was built on the development site. Furthermore, it should be noted that Bridgehouse Court is built directly onto the site boundary and rises to three storeys whilst the proposed building is set back from the boundary and angled away from Valentine Row.

126 The results of the 'mirror test' demonstrate that the worst affected window would achieve a VSC of 16.38% which is 0.53% less than the worst case scenario with the full proposed development in place. Additionally, of the seven first floor windows

assessed as part of the 'mirror test', five would experience a lower VSC than with the proposed development in place thereby demonstrating that the proposed development does not take more than its fair share of light from Bridgehouse Court.

127 *Bridgehouse Court no sky line*

The NSL assessment demonstrates that all but one of the rooms surveyed at Bridgehouse Court meets the BRE Guidelines. The room that does fall below experiences a reduction of 21% which is only marginally below the guidelines.

Bridgehouse Court average daylight factor

128 The Average Daylight Factor (ADF) is a more detailed assessment and considers the amount of sky visibility on the vertical face of a window, but also the window size, room size and room use. The recommendations for ADF in dwellings are 2% for kitchens, 1.5% for living rooms and 1% for bedrooms. Whilst it is noted that the BRE recommends ADF primarily as an appropriate measure for new buildings and master planned areas, it can also be used to give an indication of how well a room will be lit.

129 In this case the exact room use of the affected windows at first floor is not known however all rooms will achieve an ADF of at least 1.5% which is suitable for a living room or a bedroom. Of the seven affected rooms on the first floor, five will experience an ADF in excess of two which would comply with the BRE guidelines, one will achieve an ADF of 1.94 which is only marginally below the highest requirement and the remaining room will achieve an ADF of 1.72 which again would be suitable for a bedroom or living room.

Conclusions on daylight

130 The results of the daylight assessment do reveal that there would be a number of rooms within Bridgehouse Court that would not meet the relevant daylighting standards of the BRE in terms of VSC. In this case it has been demonstrated by the 'mirror test' that Bridgehouse Court will continue to achieve adequate levels of daylight in relation to its scale and position relative to the development site. Additionally the NSL and ADF tests illustrate that the BRE standards will be met for these criteria showing that adequate lighting will be achieved in relation to the highly urbanised location where there should also be some acknowledgement that the site is in an Opportunity Area within a Central London location and accordingly the standards should be applied with some degree of flexibility. On balance, the impact on daylight to adjoining residents is considered acceptable.

Sunlight

131 All of the windows within 90 degrees of due south have been assessed with regards to impact on sunlight. The BRE guide states with regards to Annual Probable Sunlight Hours (APSH), that if a window can receive 25% of summer sunlight, including at least 5% of winter sunlight between the hours of 21 September and 21 March, then the room would be adequately sunlit.

132 *Quentin House*

The APSH results for the ground and first floor indicate that compared to the existing situation, no new windows will fall below 5% APSH in winter. there will be some minor reductions in summer APSH however only in the range of 1%-5% with no previously compliant windows falling below the BRE standards.

133 *6 Barons Place*

Sunlight assessments have not been undertaken at this building as the windows that face onto the application site are within 90 degrees of due north, therefore sunlight availability is limited by orientation regardless of the proposed development.

134 *2-8 and 34-36 Webber Row*

Sunlight assessments have not been undertaken at this building as the windows that face onto the application site are within 90 degrees of due north, therefore sunlight availability is limited by orientation regardless of the proposed development.

135 *The Crown Public House*

The APSH results indicate that all windows would meet the BRE guidelines.

Bridgehouse Court 109-115 Blackfriars Road

136 Sunlight assessments have not been undertaken at this building as the windows that face onto the application site are within 90 degrees of due north, therefore sunlight availability is limited by orientation regardless of the proposed development.

Conclusion on sunlight

137 As with daylight, there are a small number of windows which would not meet the BRE guidelines for summer and winter sunlight. However, the extent of non compliance is considered minor overall and no previously compliant windows will become non compliant. As such the development is considered to be acceptable in terms of its impact on sunlight to neighbouring properties.

Overlooking

138 In order to prevent adverse impacts in terms of overlooking and loss of privacy, the Residential Design Standards recommends a minimum separation distance of 12 metres at the front of the building and any elevation that fronts a highway and 21 metres at the rear.

139 It is noted that the commercial properties at 2-10 and 12-14 Valentine Place all have less than a 12m separation from the proposed development (7m and 8.5m respectively) however these are commercial properties and as such their will be no impact on their amenity as such. It is noted that there could be an impact on the amenity of future occupiers of the development by being overlooked by 2-10 and 12-14 Valentine Place however as these are commercial properties it is considered that there will only be the potential for overlooking at specific times of the day (generally during business hours) when dwellings are usually less intensively used. On balance, and given the tight street plan of the area and the retention of the Maltina Bakery facade, the separation distance between 2-14 Valentine Place and the development site is not expected to generate any detrimental amenity impacts either for the commercial properties or for future residents.

140 The neighbouring residential properties at 37-53 Quentin House, 6 Barons Place, 2-8/34-36 Webber Row and the new residential development at 46-48 Webber Street all lie well in excess of 12m from the facades of the proposed development (15m at the closest point) and as such there will be no adverse amenity impacts. The primary Education Language Centre on Webber Street, whilst not residential, also lies well in excess of 12 metres from the application site and as such it is considered that there will be no adverse impact on these properties or on future occupiers of the development.

141 It is noted that the proposed terraced dwellings on Valentine Row lie well within 12m of the main facade of the dwellings at Bridgehouse Court, going from 8m separation at the widest point down to 4m at the closest. The ground floor of Bridgehouse Court is in use as car parking and as such there will be no impact on overlooking from the ground floor of the terraced dwellings on Valentine Row where the principal accommodation is located on the rear facing facade. The first floor of the terraced dwellings accommodate bedrooms on the front facing facade with the second floor accommodating bathrooms with obscure glazing which will ensure the privacy of both the occupiers of Bridgehouse Court and the future residents of Valentine Row. Given the historic street pattern that is being reinstated and the positioning of the principal

accommodation on the rear facades, the shorter separation distance is considered acceptable in this instance.

- 142 The Crown Public House has residential accommodation on the upper levels however the separation distance is only minimally below the 12m recommendation and largely faces onto the proposed new office accommodation and as such here are no significant amenity concerns in terms of overlooking or loss of privacy.

Noise and vibration

- 143 The noise impacts from the redevelopment of the site would be highest during the demolition of the existing buildings and substructure works (which would include excavation and piling works) and lowest during the internal fit out and landscaping. Traffic noise from construction would increase noise levels, particularly along Valentine Place and Webber Street however a Construction Management Plan will put in place measures to reduce excessive noise as far as is possible. The noise impacts from demolition and construction would be temporary in nature and it is not envisaged that any long term disturbance would be caused by the use of the completed scheme.

- 144 The predicted change in traffic flow on surrounding roads is considered low, and therefore there should be no increase in noise levels from vehicles. The noise from plant and machinery installed would fall below background noise levels and therefore would protect residential amenities.

- 145 There would be an increase in the number of residents, visitors and workers as a result of the new homes, retail and new offices. However, it is unlikely that there would be any demonstrable harm caused to residential amenities from their comings and goings. The site is located in a busy central London environment where some noise should be expected.

Air quality

- 146 The proposed development is within an Air quality management area that is challenged in meeting air quality objectives in particular for Nitrogen Dioxide and particulate matter. The Councils Environmental Protection Team have considered the Air Quality Assessment that has been submitted. The assessment, using historic data, predicts that the development will not have a significant impact on existing air quality whilst the traffic increase is predicted to be in the region of 1.2%. Although the objectives for NO₂ is likely to be exceeded the resultant increase in levels will not be of a magnitude to refuse planning permission.

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

- 147 It is not considered that there will be any conflict of use detrimental to amenity. Whilst it is noted that there could be an impact on the amenity of future occupiers of the development by being overlooked by 2-10 and 12-14 Valentine Place. On balance, and given the tight street plan of the area and the retention of the Maltina Bakery facade, the separation distance between 2-14 Valentine Place and the development site is not expected to generate any detrimental amenity impacts either for the commercial properties or for future residents.

Transport issues

- 148 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 (PTAL)

- 149 The site has the highest level of public transport accessibility with a PTAL level of 6b, rated on a scale of 1-6 where 1 represents low accessibility and 6 the highest accessibility. There are several railway and London Underground stations located within the vicinity of the site. Blackfriars South, Southwark and Blackfriars. Waterloo and London Bridge stations are all relatively close by at around 20 minutes walk. The site is well connected to the London bus network, cycle routes and walking routes.

Site layout

- 150 The site occupies the full development site with pedestrian and cycle access around the full perimeter and vehicular access on Valentine Place and Webber Street only. No new traffic routes are created. Cycle desire lines will be routes in northern, eastern and western directions to major employment areas in the West End and the city although some southern movement may occur towards Elephant and Castle. The levels of pedestrian footfall around the site is comparably high during typical morning and evening peaks reflecting the surrounding land uses of residential and office space. Highway widths are narrow, particularly on Valentine Place, with Webber Street carrying comparably high levels of traffic flow through out the day. However, it is acknowledged that this reflects the historic character of the area, which is important to the Valentine Place conservation area. Webber Street is also the point of access and egress for all on site car parking.

Car parking

- 151 Residential developments within CAZ should be car-free (except disabled parking provision) and as such no general parking is proposed. Given the site's high PTAL, and location in the CAZ and a CPZ this is proposal is acceptable and policy compliant.
- 152 The disabled parking will be accessed off Webber Street utilising a section of an existing crossover. It is proposed that the existing crossover will be modified to reflect the position of the proposed site access. All other residents will be prohibited from applying for on-street parking permits and this will be secured by condition.
- 153 Three years free car club membership should be provided for each eligible person associated with the residential use and this will be secured as part of the S106 Agreement.

Cycle parking

- 154 The proposed development will provide a total of 220 cycle spaces this provision is welcomed as it exceeds Southwark and London Plan standards. The spaces will be provided in a secure storage space at basement level with 96 of the spaces being dedicated to the residential development accessed separately to the office use.
- 155 The cycle parking storage will be accessible by a lift and the dimensions of the lift are suitable to accommodate a cycle and cyclist. The majority of the cycle parking being provided is two tier however a number of Sheffield Stands are also proposed with the final split being secured by planning condition as two-tiered or vertical (and semi-vertical) storage systems are not recommended for the entirety of cycle parking as it is known that the elderly, children and the mobility-impaired often have difficulty in using them.

Servicing

- 156 The initial servicing proposal was on street from midway down Valentine Place with additional servicing taking place on Webber Street. This was considered unacceptable and following officer advice the applicant is now proposing a semi off-street servicing

bay at the top of Valentine Place adjacent to the proposed new offices. This will require the relocation of motorcycle parking at cost to the applicant and this has been included within the S106 Agreement. The amended servicing location is now considered acceptable.

Travel Plan

- 157 The Framework Travel Plan is largely acceptable and should be secured in the Legal Agreement. The Applicant states that the main target of the travel plan will be to encourage cycling and achieve the cycle mode share of 7% of trips for the residential development as indicated in the trip generation analysis. A far higher target for journey to work mode share for the residential aspect of the development will be required as part of the Travel Plan. Initiatives to encourage cycle use should go beyond those included in the draft plan, including annual monitoring, and this should be clarified in the final Travel Plan.

Demolition/Construction

- 158 A construction management plan would be conditioned as part of any consent issued. The construction management plan should suitably mitigate and manage the impact of all construction related vehicles on the highway and its users, with particular focus on the protection of pedestrians and cyclist around the site.

Conclusion on transport and highways issues

- 159 The proposed development is acceptable as car free and makes good provision for disabled car parking, and will provide a satisfactory level of cycle parking. Servicing has been resolved and is now considered acceptable whilst a Service Management Plan and Construction Management Plan should be secured by condition along with details of cycle parking and refuse storage.

Flood risk

- 160 The site is located within Flood Zone 3 which is considered to be an area of high risk of flooding due to the proximity of the tidal River Thames. However the site is protected by the Thames Barrier and related defences. The Environment Agency were consulted on the application and they have advised that they would have no objection to the proposal subject to the attachment of conditions in relation to contamination, foundation design and surface water drainage (SUDS).

Archaeology

- 161 The site is not located in an archaeological priority zone, however recent work in the immediate area of the site at 109-115 Blackfriars Road has revealed finds of Anglo-Saxon pottery. Finds of this period within Southwark are rare and worthy of further investigation. It is therefore recommended that a programme of archaeological evaluation works is undertaken on site and depending upon the results of these works further archaeological work may be necessary. It is also considered prudent to apply a condition in order to manage impacts from foundations. The historic buildings at 3-5, 17-19 Valentine Place and 21 Webber Street should be subject to a programme of building recording with further conditions being applied to secure the reporting on the archaeological works and building recording.

Impact on trees

- 162 The Urban Forester has been consulted on the proposed development and welcomes the introduction of street greening and the provision of the landscaped courtyard. It is recommended that tree planting and landscaping be secured by way of a planning condition to ensure a high quality, comprehensive hard a soft landscaping scheme. Existing street trees on Webber Street will also need to be protected during

construction works and this can also be secured by condition.

Planning obligations (S.106 undertaking or agreement)

163 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 Supplementary Planning Document (SPD) on Section 106 Planning Obligations, (which sets out in detail the type of development that qualifies for planning obligations), and Circular 05/05, which advises that every planning application will be judged on its own merits against relevant policy, guidance and other material considerations when assessing 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.

164 The Community Infrastructure Levy Regulations came into force on 6th April 2010. The regulations state under 122 - "Limitation on use of planning obligations" that it is unlawful for a planning obligation to be taken into account when determining a planning application for a development, or any part of a development, that is capable of being charged CIL if the obligation does not meet all of the following tests:

- 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.

165 The applicant has submitted a proposed Heads of Terms based on the Council's Planning Obligations SPD. The following table sets out the contributions payable based on the Section 106 Planning Obligations SPD and what the applicant has proposed to offer.

Topic/Obligation	Toolkit requirement (£)	Applicants contribution (£)
Education	136,922	136,922
Employment in the development	43,111	43,111
Employment during construction	95,746	95,746
Archaeology	5,471	5,471
Employment d/c management fee	7,250	7,250
Public open space	50,936	50,936
Children's play equipment	11,050	11,050
Sports development	124,298	124,298
Transport (strategic)	80,957	80,957
Transport (site specific)	74,860	74,860
Public realm	90,360	90,360
Health	72,301	72,301
Community facilities	25,647	25,647
Admin charge	16,378	16,378
Total	835,287	835,287

167 In addition to the terms set out above, the legal agreement would also secure the following:

- Affordable housing provision in the form of 13 affordable rent units, six shared ownership units and an in lieu payment of £500,000.
- Travel plans for both the residential and commercial elements;
- Car club membership for three years;

- Relocation of motorcycle parking on Valentine Place at cost to the applicant which is estimated at £3,000 (to be included in a S.278 Agreement);
- Review mechanisms in case of a delayed commencement to secure an increased proportion of affordable housing if viability has improved.

168 In addition to the contributions outlined above a further financial contribution of £63,157 is sought on behalf of TfL towards the Blackfriars Road Improvement Project. This has been agreed by the applicant

169 It is considered that the planning obligations sought meet the planning tests of Circular 05/05 and the CIL regulations. The contributions would be spent on delivering new school places as a result of the development, job creation during construction and in the final development, improvements to open spaces and sports facilities, improvements to transport provision, improvements to the public realm, new health facilities and improvements to community facilities. The affordable housing will also be secured by S106 Agreement.

170 In accordance with the recommendation, if the Section 106 Agreement is not signed by 30th September 2014, the Head of Development Management is authorised to refuse planning permission, if appropriate, for the reason below:

171 '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 affordable housing, public realm, public open space, sports facilities, education, health, affordable housing, the transport network, community facilities and 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' 2007, and Policy 8.2 Planning obligations of the London Plan 2011.'

Mayoral Community Infrastructure Levy

172 The Mayor's CIL came into effect in April 2012 and apply a financial levy against all developments which will go towards the delivery of Crossrail. The levy is not discretionary and must be applied to all developments at a rate of £35 per square metre in Central London and will be prioritised over all other planning obligations.

173 The total amount of new floorspace being created by the development equates to 6,478sqm which would result in a CIL charge of £226,730.

Sustainable development implications

174 The energy statement 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 25%. Strategy Policy 13 also requires developments to achieve a minimum Code for Sustainable Homes standard of 'Level 4' and a BREEAM standard of 'Excellent'.

175 *Energy efficiency*

A range of passive design features and demand reduction measures are proposed to reduce the carbon dioxide emissions of the proposed development. These include air permeability, high efficiency lighting, improved specific fan power, improved thermal bridging details and mechanical ventilation with heat recovery. This should achieve a 26.2% improvement on Part L which meets the requirements of the Sustainable

Design and Construction SPD.

176 *Renewable energy*

The applicant is proposing the use of Air Source Heat Pumps in the form of a number of external modular units located on the roof of each block which will be similar in appearance to air conditioning units. ASHP have been proposed due to the carbon saving they offer and the renewable energy contribution that can be made. The total heat energy delivered by air source heat pumps is considered renewable energy once the electrical energy consumed by the heat pumps is taken into account. Expressed as a percentage, the ASHP provide a 46% on-site renewable contribution.

Code for Sustainable Homes and BREEAM

- 177 The development expects to achieve a code level 4 rating, which meets the minimum standard. A BREEAM 'excellent' rating will be required of the commercial space and both ratings will be secured by way of planning condition.

Conclusion on planning issues

- 178 The proposed scheme would have a positive impact on the Valentine Place conservation area, retaining a key facade to the Maltina bakery, and providing new buildings which respect the scale and character of the area. It will bring an underused site into beneficial use, with a mixed use development.
- 179 The redevelopment of the site is supported and welcomed in principle. The inclusion of housing on the site is also accepted, and would be in line with policy aspirations to increase the number of new housing units in the area.
- 180 The reduction of office floorspace is also considered acceptable on balance, owing to the high quality of the replacement floorspace and the increase in job creation that would result balanced against the relatively minor shortfall in re-provision.
- 181 The development would result in high quality accommodation with an excellent standard of design. It is noted that several units do not benefit from private amenity space and this is to a large extent a result of the retention of the historic facade of the Maltina Bakery building and as such is acceptable on balance.
- 182 The amenity impacts to adjacent occupiers in terms of outlook and loss of daylight/sunlight are considered to be relatively minor in the context of the development and the site location within central London and are, on balance, considered acceptable.
- 183 The loss of the majority of the buildings on the site is considered acceptable on balance due to the retention of the Maltina Bakery facade which is the key element of historic interest and the high standard of design being proposed which is considered to protect and enhance the character and setting of the conservation area.
- 184 The proposed level of affordable housing of 28%, comprising 26% on-site and a further 2% via an in lieu payment is considered acceptable on balance due to the high existing use value and the requirement to provide a modest scheme to respect the local townscape and heritage setting which has affected the viability of the scheme. The viability information has been carefully assessed and it is concluded that this is the maximum the development could reasonably support whilst remaining deliverable.
- 185 It is therefore recommended that permission be granted, subject to conditions as set out in the attached draft decision notice, completion of a S106 agreement on terms as set out above.

Community impact statement

186 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.

a) The impact on local people is set out above.

b) There are no issues relevant to particular communities/groups.

c) There are no likely adverse or less good implications for any particular communities/groups.

Consultations

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

Consultation replies

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

Summary of consultation responses

189 Following public consultation, 19 letters/emails of objection have been received, the main points of which have been summarised and addressed below;

190 Objection - Retail outlets will cause disturbance due to noise and disruption in the early morning/late evening.

Response - The retail outlets are fairly small in size and operating hours will be controlled by way of condition in order to ensure there will be no undue level of disturbance.

191 Objection - The application fails to comply with National/Local policies regarding heritage and conservation areas as almost 50% of the buildings on site will be demolished with the exception of the facade of the Maltina Bakery building. Its disappointing that no options are presented for the retention, repair and refurbishment of the Maltina Bakery building as a whole or retention/repair of the Victorian Facade at 3-5 Valentine Place. This is in direct conflict with the NPPF Section 12, The Southwark Plan 2007 and the Valentine Place Conservation Area Appraisal (2012).

Response - None of the buildings on site are listed and as such the interiors do not form part of the heritage designation of the conservation area which is based solely on external appearance and character. The applicants are retaining the key historic facade of the Maltina Bakery and retaining the internal staircase which is a positive aspect of the development.

192 Objection - The demolition of 50% of the Conservation Area disregards expert opinion on the townscape value and local support for its retention.

Response - The proposal compliments its historic setting and enhances the setting of the Valentine Place Conservation Area. The retention of the key historic facade at the Maltina Baker is a positive aspect of the scheme and the loss of the remaining buildings, which will be fully demolished, is not considered to have a detrimental impact on the Conservation Area, the character of which will be both protected and enhanced by the proposed development.

- 193 **Objection** - The planning application fails to make the case for the demolition of the Maltina Bakery building in all but its facade and the survey undertaken may not be impartial. Furthermore, there is value in the internal fabric of the building beyond the facade even though this has been altered in the past. There is particular value in the chimney, roof extension and contribution to the townscapes industrial heritage.
Response - As detailed above, none of the buildings on site are listed and as such the interiors do not form part of the heritage designation of the conservation area which is based solely on external appearance and character. The applicants are retaining the key historic facade of the Maltina Bakery and retaining one internal staircase which is a positive aspect of the development. The architectural expression of the proposed development is both robust and confident and reflects the historic context of this important site, retaining the key historic facade and heights which are appropriate to the context and not overbearing on the townscape.
- 194 **Objection** - The building has been used as a bakery, printworks and individual office space in the past and is clearly still considered to be of a suitable standard to allow people to work in it therefore the current owners should present options for refurbishment and retention of the interior.
Response - The heritage value of this site is focused on the external appearance of the buildings within the conservation area including their character and setting. The key historic fabric is the facade of the Maltina Bakery building which is being retained along with the internal staircase. The remaining internal features are limited and do not form part of the character or setting of the conservation area and as such their loss is not considered to have any demonstrable impact on the heritage asset.
- 195 **Objection** - Successive owners have failed to take care of the building in an acceptable manner, including the current owners who failed to notify emergency gas workers that they were working alongside a building of note in a conservation area leading to damage of the faience facade by rubble. Given that the building is within a Conservation Area and that the NPPF states that the deteriorated state of a heritage asset should not be taken into account where there is evidence of deliberate neglect or damage, it is reasonable to expect the applicant to present an alternative case for retention of the interior.
Response - The building is not listed and the interior is not considered to form part of the heritage value of the Conservation Area which is based on the character and setting of the buildings within the conservation area based on their use and external appearance. The inefficient layout and arrangement of the interior does not lend itself to modern office usage. The proposed scheme will rationalise the floorspace and layout whilst retaining the facade of the Maltina Bakery and providing new homes in a well designed building that is appropriate to its local context in terms of its design.
- 196 **Objection** - The applicants purchased the building in the 1990's when prices were very low compared to today and as such don't have a land cost as part of their application. It is therefore entirely reasonable to expect the applicant to come forward with a scheme that does more than retain the facade of the Maltina bakery. The Financial Viability Assessment submitted with the application has not been made available for consultees and this has created an obstacle for their being able to assess the potential for expecting the applicants to present an alternative financial case based on retention and restoration of the entire Maltina building.
Response - Whilst it would be a positive aspect of the development for the applicant to retain the buildings on site, they are not listed and are inefficient in terms of layout and internal organisation. The Viability Assessment that has been submitted is relevant to the provision of affordable housing as opposed to the retention of the interiors.
- 197 **Objection** - The application fails to make the case for the demolition of the Victorian

Facade of 3-5 Valentine Place with very little research completed which contradicts the requirements of NPPF Section 12.

Response - Its status as a designated heritage asset is established in the NPPF and since there is little of historic interest beyond the facades, which are to be retained, the proposal involves less than substantial harm and can be considered under the requirements of paragraph 134 of the NPPF which states: "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use."

- 198 **Objection** - The proposed buildings are too high, will have a series of negative effects on the Conservation Area and are in direct conflict with the Conservation Area Appraisal and consultation responses which states that new development heights should range between 2-4 storeys, respect adjacent building heights, maintain roof lines of heritage assets (warehouses and industrial buildings within the CA) and chimney stacks and pots should be retained. Furthermore, 23 questionnaire respondents stated that it was important to respect the scale and context of the locality.

Response - The highest part of the proposal is the office building on Valentine Place. In its architectural design it reflects the character of the conservation area. The result is a highly modulated robustly detailed modern re-interpretation of the existing warehouse buildings on Valentine Place. The heights are considered appropriate to their location and local context. The loss of the chimney is not considered detrimental to the character or setting of the Valentine Place Conservation Area.

- 199 **Objection** - There will be a loss of light beyond BRE guidelines at Quentin House which the applicants seek to attribute to their being recessed balconies above the affected rooms which is clearly an unreasonable claim. there would also be an impact on Bridgehouse Court in terms of daylight and sunlight (VSC).

Response - The results of the daylight assessment do reveal that there would be a number of rooms within Bridgehouse Court that would not meet the relevant daylighting standards of the BRE in terms of VSC. In this case it has been demonstrated by the 'mirror test' that Bridgehouse Court will continue to achieve adequate levels of daylight in relation to its scale and position relevant to the development site. Additionally the NSL and ADF tests illustrate that the BRE standards will be met for these criteria showing that adequate lighting will be achieved in relation to the highly urbanised location where there should also be some acknowledgement that the site is in an Opportunity Area within a Central London location and accordingly the standards should be applied with some degree of flexibility. On balance, the impact on daylight to adjoining residents is considered acceptable.

- 200 **Objection** - The applicants have disregarded the importance of the real perimeter of the conservation area and are proposing heights that are well in excess of all other existing heights along the northern perimeter and this will alter the whole setting of the conservation area.

Response - The highest part of the site is the office building close to 'One Valentine Place' and as such is contextually appropriate to the immediate locality. The buildings then step down along Valentine Place to the lower heights at the Malta Bakery and Webber Street. This is an appropriate response to the heights within the conservation area and its character/setting.

- 201 **Objection** - The whole shape of the Conservation Area will be dramatically altered along with views into it from Webber Row, Webber Street, Blackfriars Road, Gray Street and Valentine Place including the removal of sunlight to the facade of 2-10 Valentine Place and a removal of long established aerial views.

Response - There is no entitlement to a view over a third parties land and the

perimeter arrangement of the proposed block reflects the current situation and as such is not considered to alter the shape of the conservation area.

- 202 **Objection** - Building onto the Maltina Bakery will cause irreparable damage to its current integrity as a heritage asset and will negatively impact on noteworthy views of the building from Webber Street. The alterations will unbalance and degrade the building and harms the setting of the Conservation Area.
Response - The proposal is considered to be a well thought out and sensitive addition to the Maltina Baker building which will be retained as an important heritage asset. The proposed additions are considered to be a contextually appropriate response to the building.
- 203 **Objection** - The proposed building heights will create a wind tunnel effect and a gloomy passageway down Valentine Place.
Response - The heights of the proposed buildings are not considered excessive to the level that they would have micro-climate impacts such as excessive wind speeds at street level and the pattern of development reflects the historic character of the area.
- 204 **Objection** - The proposed level of affordable housing is significantly below the required policy levels.
Response - As it stands, the current affordable housing offer of 26% on-site and a further 2% in lieu is considered acceptable. Potentially more affordable housing could be delivered on this site if there was a greater quantum of development overall, however due to the heritage setting of the application site and the requirement to limit heights to respect the local townscape, a modest scheme such as this would be considered the preferable option in order to sufficiently balance the benefits of bringing a mixed use scheme forward against the impacts on the Valentine Place Conservation Area. This, together with the high existing use value, has resulted in a scheme with a lower level of affordable housing that is considered acceptable on balance.
- 205 **Objection** - All of the buildings except 27-31 Webber Street contribute to the group value of the Conservation Area which was established to preserve a small section of Southwarks Victorian and Edwardian heritage which will be demolished and disfigured by the proposals.
Response - Whilst the group of buildings contribute to the Conservation Area the most significant heritage asset is the Maltina Bakery building which will be retained. The remaining buildings that will be demolished, whilst pleasant, are not as integral to the character or setting of the Valentine Place Conservation Area.
- 206 **Objection** - The Maltina Bakery building is rich in architecture and also identifies the social history of the area, its loss will have a negative impact and shows laziness and lack of imagination.
Response - The Maltina Bakery building, along with the internal staircase, is being retained and as such will protect the character of the Conservation Area.
- 207 **Objection** - The proposed development will result in a loss of privacy, loss of outlook and loss of daylight and sunlight to Bridgehouse Court all as a result of the height and proximity of the proposed development.
Response - The issues with daylight and sunlight have been covered above in paragraphs 114-137. It is noted that the proposed terraced dwellings on Valentine Row lie well within 12m of the main facade of the dwellings at Bridgehouse Court, going from 8m separation at the widest point down to 4m at the shortest. The ground floor of Bridgehouse Court is in use as car parking and as such there will be no impact on overlooking from the ground floor of the terraced dwellings on Valentine Row where the principle accommodation is located on the rear facing facade. The first floor of the terraced dwellings accommodate bedrooms on the front facing facade with the

second floor accommodating bathrooms with obscure glazing which will ensure the privacy of both the occupiers of Bridgehouse Court and the future residents of Valentine Row. Given the historic street pattern that is being retained and the positioning of the principle accommodation on the rear facades, the shorter separation distance is considered acceptable in this instance.

208 **Objection** - There is no coherent strategy for the design of the public spaces and the impact of the development during construction will be detrimental to the road, kerbs and pavements. Furthermore the creation of a gated community is a missed opportunity to create improved connections/ground level public experience.

Response - The Metropolitan Police support the restriction on the use of the communal courtyard to residents only and this is acceptable on a small site such as this. In terms of the public spaces, materials will be secured by way of condition to ensure a cohesive, high quality finish.

209 **Objection** - The proposal will result in a loss of business use with a change in the character and quantum of business use with a move away from creative manufacturing in favour of enterprise which could also have an impact on the conservation area.

Response - The character of the conservation area will not be detrimentally affected by the re-provision of B Class floorspace or the introduction of small scale retail. Residential use is already an established part of the character of the conservation area. The reduction in employment floorspace is considered minimal and the improved quality of office accommodation will make the site more efficient in terms of the level of employment.

210 **Objection** - Commercial activity at ground floor on Valentine Place will be lost in favour of residential units which does not reflect the historic activities of the area.

Response - There is very little commercial activity on the frontages of Valentine Place and the proposal is considered to be an improvement in terms of active frontage and animation.

211 **Objection** - The proposals could improve social sustainability by accommodating a range of tenures including live work.

Response - The proposal is mixed use with retail, office and residential and as such is considered to be a positive contribution in terms of social sustainability.

212 **Objection** - Its unusual for a Conservation Area to consist of such a high proportion of building in the same ownership and developed by the same architect and the development team must prove that the Conservation Area will be enhanced by, and not detrimentally affected by their proposals.

Response - Ownership of the application buildings is not a planning consideration. The planning department are duty bound to determine the application as submitted which is considered to be of a very high standard both in terms of design and accommodation. Further details will be secured by way of planning conditions to ensure a high quality finish.

213 **Objection** - Allocating future residents with parking permits will make parking almost impossible and the existing permit hours should be extended as out of hours parking will be made even worse with 60 new properties.

Response - Future occupiers will be exempted from obtaining parking permits. There are no plans to extend the current levels of restriction.

214 **Objection** - The proposed uncovered balconies on Webber Street and Valentine Place will result in severe noise disruption.

Response - The use of balconies is not considered to be a risk in terms of noise and disturbance. Many existing properties in the area have street-facing balconies.

- 215 **Objection** - The Consultation exercise is inadequate, being carried out over Christmas which has affected the ability of some residents to respond.
Response - The original letters sent out for consultation on the 6th December specifically detailed that the consultation period would be open until the 10th of January, resulting in a consultation period of five weeks. As always the Council continued to accept letters of objection beyond the consultation period.
- 216 **Objection** - The proposal should include a higher proportion of residential accommodation to office space and given the housing targets perhaps it should be entirely residential.
Response - The level of residential accommodation being proposed is considered to be appropriate to the site and its context.
- 217 **Objection** - Occupiers on all levels of Quentin House will experience a loss of daylight and sunlight.
Response - The VSC results for Quentin House demonstrate that all but two of the windows assessed at ground and first floor will meet the minimum requirements of the BRE. The two windows that do not meet the minimum BRE guidelines are on the ground floor and are situated under recessed balconies with a reduction of 22% which is just above the BRE recommended limit of a 20% reduction. The BRE guidelines note that if the VSC reduction without the balconies in place is less than 20% then it is the balcony as opposed to potential development obstructions that is the reason for the larger reduction. In this case the assessment to the windows without the balconies in place show a reduction of less than 20% VSC indicating that the balconies are the reason for the reduced VSC. In terms of the No Sky Line assessment, two of the 28 rooms surveyed would fail to meet the guidelines however these rooms will have adequate VSC to ensure sufficient daylight. As such 89% of the rooms at Quentin House are compliant in NSL.
- 218 **Objection** - The proposals fail to comply with the planning policy on density with substantial space given to terraces which will impact on privacy.
Response - The proposed density is 1044 habitable rooms per hectare and lies within the policy range limit of 1100 habitable rooms per hectare.
- 219 **Objection** - Traditional materials and features should be re-used/retained where possible. The top storey is not in keeping with the area and the proposed materials of the top floor are unacceptable in colour and form.
Response - Materials will be secured by way of a planning condition.
- 220 **Objection** - The implementation of the works will cause disturbance and disruption to residents and detailed plans should be required to show how this will be managed and minimised.
Response - All development in urban areas has an inevitable and unavoidable level of disruption. The proposed construction hours will be in line with Southwarks standards and a Construction Management Plan will be secure by way of a condition to minimise disruption to residents.
- 221 **Objection** - Despite a considerable increase in density on the site, the proposals show a reduction of B1 commercial floorspace from 4501 sqm NIA (net internal area) to 2658 sq m NIA. The B1 space is confined to the northern part of the site and the historic commercial usage along the eastern part of Valentine Place, along Webber Street and Valentine Row will be lost.
Response - The existing total B class floorspace equates to 4225.8sqm GIA with a proposed re-provision of 3853.6sqm GIA of B1 space resulting in a shortfall of 372.2sqm of B1 floorspace. The existing floorspace is inefficient in terms of layout and when comparing the existing usable area (2790.8sqm NIA) with the proposed re-

provision (2791.3sqm NIA including the A1-A3 floorspace) the overall re-provision of B1 and A1-A3 floorspace is considered comparable to the existing situation with a difference of 0.5sqm. There is very little active commercial frontage on Valentine Place/Webber Street and the proposal will introduce more active frontage both from the office accommodation and the small scale retail.

222 **Objection** - Only 35% of the available frontage will be commercial which will represent a reversion of the spirit of the Conservation Area and the ambitions of the Waterloo Quarter Business Improvement District which aims to encourage active commercial frontages in existing commercial areas.

Response - The level of active commercial frontage will be an improvement on the existing situation and is considered a positive aspect of the scheme.

223 **Objection** – The loss of the historic buildings and the loss of the industrial/commercial use on the site will fail to preserve or enhances the special interest or historic character of the Conservation Area.

Response - The proposal compliments its historic setting and enhances the setting of the Valentine Place Conservation Area. The retention of the key historic facade at the Maltina Baker is a positive aspect of the scheme and the loss of the remaining buildings, which will be fully demolished, is not considered to have a detrimental impact on the Conservation Area, the character of which will be both protected and enhanced by the proposed development. the proposed buildings are well designed and respond to the warehouse nature of the existing buildings on site and the nature of the surrounding area.

224 **Objection** - 3-5 Valentine Place is to be demolished in its entirety losing the historic saw-toothed roof profile. The old bakery at will remain only as a façade with residential use behind. This will negatively affect the Conservation Area.

Response - Its status as a designated heritage asset is established in the NPPF and its loss would be considered as 'substantial harm'. In this case, given that there is little of historic interest beyond the facades which are to be retained, the proposal involves less than substantial harm and can be considered under the requirements of paragraph 134 of the NPPF which states: "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use."

225 **Objection** – The proposed buildings are too high at 5-7 storeys. The district has a clearly defined urban model: the main arteries of Waterloo Road and Blackfriars Road are fronted with tall facades with buildings of lesser height defining the buildings behind. The Conservation Area is already dense, but the current proposals constitute an over development of the site.

Response - The scale of the buildings, at 3-7 storeys, in considered appropriate and make efficient use of the site.

226 **Objection** - There are no proposals to improve public realm apart from a small area of open space between 7 storey buildings to the east. No improvements to the green infrastructure have been proposed and there is no detail of landscaping within the gated development.

Response - Landscaping details will be secured by condition and public realm improvements include the planting of street trees and re-paving of Valentine Passage as well as a financial contribution towards the Blackfriars Road Public Realm Improvement.

227 In addition to the above neighbour responses, comments were received from internal, statutory and non-statutory consultees and these are summarised in Appendix 2.

Human rights implications

- 228 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.
- 229 This application has the legitimate aim of providing commercial and residential accommodation. 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

- 230 N/A

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1390-102 Application file: 13/AP/3791 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

Lead Officer	Gary Rice, Head of Development Management	
Report Author	Terence McLellan	
Version	Final	
Dated	19 July 2014	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic director, finance & corporate services	No	No
Strategic director, environment and leisure	No	No
Strategic director, housing and community services	No	No
Director of regeneration	No	No
Cabinet member		No
Date final report sent to Constitutional Team		19 June 2014

APPENDIX 1

Consultation Undertaken

Site notice date: 20/12/2013

Press notice date: 05/12/2013

Case officer site visit date: 20/12/2013

Neighbour consultation letters sent: 06/12/2013

Internal services consulted:

Archaeology
Design and Conservation
Environmental Protection
Planning Policy
Transport

Statutory and non-statutory organisations consulted:

Conservation Area Advisory Group
English Heritage
Environment Agency
London Borough of Lambeth
Metropolitan Police
Thames Water
Transport for London

Neighbours and local groups consulted:

06/12/2013	FLATS 1-28 BRIDGEHOUSE COURT BLACKFRIARS ROAD LONDON SE1 8HW
06/12/2013	27-31 WEBBER STREET LONDON SE1 8QW
06/12/2013	FLATS 37-53 QUENTIN HOUSE CHAPLIN CLOSE LONDON SE1 8UZ
06/12/2013	FLAT 9 QUENTIN HOUSE GRAY STREET LONDON SE1 8UY
06/12/2013	39 WEBBER STREET LONDON SE1 8QW
06/12/2013	37 WEBBER STREET LONDON SE1 8QW
06/12/2013	BLOCK R FLATS 1-11 PEABODY SQUARE BLACKFRIARS ROAD LONDON SE1 8JF
06/12/2013	BLOCK Q FLAT 1 PEABODY SQUARE BLACKFRIARS ROAD LONDON SE1 8JE
06/12/2013	BLOCK T FLATS 1-14 PEABODY SQUARE BLACKFRIARS ROAD LONDON SE1 8HS
06/12/2013	21 WEBBER STREET LONDON SE1 8QW
06/12/2013	19 VALENTINE PLACE LONDON SE1 8QH
06/12/2013	FRIDEN HOUSE 96-101 BLACKFRIARS ROAD LONDON SE1 8HW
06/12/2013	UNIT 5 109-115 BLACKFRIARS ROAD LONDON SE1 8JS
06/12/2013	FIRST FLOOR 1-7 BOUNDARY ROW LONDON SE1 8HP
06/12/2013	3-7 VALENTINE PLACE LONDON SE1 8QH
06/12/2013	FIRST FLOOR 6-10 VALENTINE PLACE LONDON SE1 8QH
06/12/2013	GROUND FLOOR 6-10 VALENTINE PLACE LONDON SE1 8QH
06/12/2013	SECOND FLOOR 4 VALENTINE PLACE LONDON SE1 8QH
06/12/2013	FIRST FLOOR 2 VALENTINE PLACE LONDON SE1 8QH
06/12/2013	BASEMENT AND GROUND FLOOR 2 VALENTINE PLACE LONDON SE1 8QH
06/12/2013	8 BOUNDARY ROW LONDON SE1 8HP
06/12/2013	SECOND FLOOR 2 VALENTINE PLACE LONDON SE1 8QH
06/12/2013	BASEMENT TO FIRST FLOORS 4 VALENTINE PLACE LONDON SE1 8RB
06/12/2013	ATTIC 2 VALENTINE PLACE LONDON SE1 8QH
06/12/2013	THIRD FLOOR 2 VALENTINE PLACE LONDON SE1 8QH
06/12/2013	BLOCK S FLATS 1-12 PEABODY SQUARE BLACKFRIARS ROAD LONDON SE1 8HT
06/12/2013	BLOCK Q FLATS 2-11 PEABODY SQUARE BLACKFRIARS ROAD LONDON SE1 8JE
06/12/2013	105 BLACKFRIARS ROAD LONDON SE1 8HW
06/12/2013	LOWER GROUND FLOOR 1-7 BOUNDARY ROW LONDON SE1 8HP

06/12/2013 GROUND FLOOR 1-7 BOUNDARY ROW LONDON SE1 8HP
 06/12/2013 1 VALENTINE PLACE LONDON SE1 8QH
 06/12/2013 10 WEBBER ROW LONDON SE1 8QP
 06/12/2013 THE CROWN 108 BLACKFRIARS ROAD LONDON SE1 8HW
 06/12/2013 APARTMENTS 1- 9 46 WEBBER STREET LONDON SE1 8QW
 06/12/2013 30 WEBBER ROW LONDON SE1 8QP
 06/12/2013 28 WEBBER ROW LONDON SE1 8QP
 06/12/2013 26 WEBBER ROW LONDON SE1 8QP
 06/12/2013 32 WEBBER ROW LONDON SE1 8QP
 06/12/2013 38 WEBBER ROW LONDON SE1 8QP
 06/12/2013 36 WEBBER ROW LONDON SE1 8QP
 06/12/2013 34 WEBBER ROW LONDON SE1 8QP
 06/12/2013 24 WEBBER ROW LONDON SE1 8QP
 06/12/2013 16 WEBBER ROW LONDON SE1 8QP
 06/12/2013 14 WEBBER ROW LONDON SE1 8QP
 06/12/2013 12 WEBBER ROW LONDON SE1 8QP
 06/12/2013 18 WEBBER ROW LONDON SE1 8QP
 06/12/2013 22 WEBBER ROW LONDON SE1 8QP
 06/12/2013 20 WEBBER ROW LONDON SE1 8QP
 06/12/2013 2 WEBBER ROW LONDON SE1 8QP
 06/12/2013 FLATS1- 6, 6 BARONS PLACE LONDON SE1 8XB
 06/12/2013 2 PONTYPOOL PLACE LONDON SE1 8QF
 06/12/2013 FLAT 5D QUENTIN HOUSE GRAY STREET LONDON SE1 8UY
 06/12/2013 SECOND FLOOR 1-7 BOUNDARY ROW LONDON SE1 8HP
 06/12/2013 UNIT 1 AND UNIT 2 109-115 BLACKFRIARS ROAD LONDON SE1 8HW
 06/12/2013 UNIT 3 109-115 BLACKFRIARS ROAD LONDON SE1 8HW
 06/12/2013 21 VALENTINE PLACE LONDON SE1 8QH
 06/12/2013 LIVING ACCOMMODATION 108 BLACKFRIARS ROAD LONDON SE1 8HW
 06/12/2013 GROUND FLOOR AND FIRST FLOOR 12-12A VALENTINE PLACE LONDON SE1 8QH
 06/12/2013 THIRD FLOOR 4 VALENTINE PLACE LONDON SE1 8QH
 06/12/2013 BLOCK S GROUND FLOOR OFFICE PEABODY SQUARE BLACKFRIARS ROAD LONDON SE1 8HU
 06/12/2013 UNIT 4 109-115 BLACKFRIARS ROAD LONDON SE1 8HW
 06/12/2013 TENANTS HALL OVERY HOUSE WEBBER ROW ESTATE WEBBER ROW LONDON SE1 8QX
 06/12/2013 4 WEBBER ROW LONDON SE1 8QP
 06/12/2013 FLATS 10-36 QUENTIN HOUSE GRAY STREET LONDON SE1 8UY
 06/12/2013 FLATS 1-25 OVERY HOUSE WEBBER ROW ESTATE WEBBER ROW LONDON SE1 8QX
 06/12/2013 CENTRE FOR LANGUAGE IN PRIMARY EDUCATION WEBBER STREET LONDON SE1 8QW
 06/12/2013 44 WEBBER ROW LONDON SE1 8QP
 06/12/2013 42 WEBBER ROW LONDON SE1 8QP
 06/12/2013 40 WEBBER ROW LONDON SE1 8QP
 06/12/2013 46 WEBBER ROW LONDON SE1 8QP
 06/12/2013 8 WEBBER ROW LONDON SE1 8QP
 06/12/2013 6 WEBBER ROW LONDON SE1 8QP
 06/12/2013 48 WEBBER ROW LONDON SE1 8QP
 20/06/1837 Flat 6 Trident House 46-48 Webber Street London XXXXX
 20/06/1837 Flat 3 Trident House 46-48 Webber Street London
 20/06/1837 Suite 2 45-46 Lower Marsh SE1 7RG
 20/06/1837 Flat 9 Trident House 46-48 Webber Street SE1 8QW
 20/06/1837 28 Gladstone Street London SE1 6EY

Re-consultation:

Not required.

Consultation Responses Received

Internal services

Archaeology

The site is not located in an archaeological priority zone, however recent work in the immediate area of the site at 109-115 Blackfriars Road has revealed finds of Anglo-Saxon pottery. Finds of this period within Southwark are rare and worthy of further investigation. It is therefore recommended that a programme of archaeological evaluation works is undertaken on site. Depending upon the results of these works further archaeological work may be necessary. To manage impacts from foundations these should be conditioned as well. The historic buildings - 3-5 and 19-19 Valentine Place and 21 Webber Street should be subject to a programme of building recording. Conditions should also be applied to secure the reporting on the archaeological works and building recording.

Response - Noted and agreed. The relevant conditions will be imposed on any consent issued.

Urban Forester

The welcome introduction of street trees on Valentine Place needs to be made subject to a condition and existing trees on Webber Street need to be protected during works.

Response - Noted and agreed, the relevant conditions will be attached to any consent issued. Tree planting would need the further agreement of the Highway Authority.

Environmental Protection

No objection subject to conditions regarding noise, land contamination and a Construction Management Plan.

Response - Noted and agreed, the relevant conditions will be attached to any consent issued.

Transport

Details of cycle and refuse storage should be reserved by condition. On street servicing is unacceptable.

Response - Cycle and refuse storage is acceptable in principle as proposed however the detail will be secured by condition. The initial servicing proposal was on street from midway down Valentine Place with additional servicing taking place on Webber Street. This was considered unacceptable and following officer advice the applicant is not proposing a semi off-street servicing bay at the top of Valentine Place adjacent to the proposed new offices. This will require the relocation of motorcycle parking at cost to the applicant and this has been included within the S106 Agreement. The amended servicing location is now considered acceptable.

Statutory and non-statutory organisations

Conservation Area Advisory Group

A good proposal, sensitively designed. A contemporary design that is still referencing the context with its warehouse typology and materials. There is appropriate scale and interest in the landscaping. It is noted that some internal features are being retained which is good.

Response - Noted.

English Heritage

Do not wish to comment in detail. A summary of the response is provided below;

- The proposed buildings would transform completely the character of the conservation area and they would grow significantly in height, over seven storeys in

- places dominated by contemporary commercial architecture;
- efforts have been made to give the new buildings a variety of character including the retention of the most historically significant facade left on this city block;
- the design still appears non-area-specific with limited concessions to the historic character of the area;
- the proposed development is not sympathetic in its scale, design or details by virtue of the extent of change proposed (and the assertive nature of that change) would cause harm to the conservation area;
- were this development approved, it is implausible that the current conservation area would merit its designation due to the height, design and materials proposed;
- the proposed office block would be most damaging and very prominent due to its location, design, materials, excessive height and its visibility from Blackfriars Road;
- traditional design elements could be introduced to the proposed building along with a reduction in height;
- the council should negotiate a more contextually sympathetic scheme.

Response - Officers consider that the proposal compliments its historic setting and enhances the setting of the Valentine Place Conservation Area. It distributes height and massing across the site appropriately with active frontages, a significantly improved permeability across the site and an appropriate hierarchy of public space. The scheme proposes an appropriate and restrained palette of materials that respects the character, appearance and the setting of this important conservation area.

Environment Agency

No objections subject to conditions regarding contamination and Sustainable Urban Drainage (SUDS).

Response - Noted and agreed, the relevant conditions will be attached to any consent issued.

Metropolitan Police

The communal garden should only be accessible by residents and the use of large planters should be avoided as this encourages groups to loiter. Gates to the disabled car park should be remote control operated and the cycle stores should have a fob access. Ideally two secure access points should be present within each residential area of the development.

Response - Noted.

Thames Water

Recommendations regarding fat traps for catering establishments, petrol/oil interceptors should be fitted within all car parking facilities, surface water drainage should be provided to a sufficient level and non-return valves should be installed to avoid the risk of backflow. A piling method statement should be secured by condition and an informative should be added regarding minimum water pressures.

Response - Noted and agreed, the relevant condition and informative will be included on any consent issued.

Transport for London

No objections however a contribution should be secured towards the Blackfriars Road Urban Realm Improvement.

Response - Noted and agreed. The applicant has agreed to pay a contribution of £63,157.

Neighbours and local groups

Responses were received from the following addresses. Their comments and objections are set out in paragraphs 192-228 of the main report.

Anonymous x 3.

Bridgehouse Court - No. 14.
Dauncey House - No. 7.
Gladstone Street - No.28 (St Georges Circus Group).
Overy House - No. 14.
Quentin House - Nos. 31 and 50.
Styles House - No. 45.
The Albert Association
Waterloo Quarter
Webber Street (Nos.46-48) - Flats 3, 5, 6 and 9.