

Item No.	Classification:	Date:	Meeting Name:
6.3	Open	14 July 2015	Planning Committee
Report title:	Development Management planning application: Application 14/AP/3842 for: Full Planning Permission Address: 185 PARK STREET, LONDON SE1 9BL Proposal: Demolition of existing buildings and redevelopment to provide a mixed use development providing three new buildings comprising basement, lower ground and ground floor plus part 9, 14 and 18 storeys (maximum height 19 storeys) containing 163 residential units (Class C3), Office (Class B1), Retail (Class A1/A3/A4), Cultural facility (Class D1/A1/A3/A4); provision of hard and soft landscaping and the provision of parking, servicing and plant areas.		
Ward(s) or groups affected:	Cathedrals		
From:	Head of Development Management		
Application Start Date 10/10/2014		Application Expiry Date 09/01/2015	
Earliest Decision Date 29/11/2014			

RECOMMENDATION

1. That the Planning Committee grant planning permission subject to conditions and the applicant entering into an appropriate legal agreement by no later than 31 October 2015 and subject to referral to the Mayor of London.
2. If it is resolved to grant planning permission, that it is confirmed that the environmental information has been taken into account as required by Regulation 3(4) of the Town and Country Planning (Environmental Impact Assessments) Regulations 2011.
3. That it is confirmed that, following issue of the decision, the Director of Planning should place a statement on the Statutory Register pursuant to Regulation 24 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2011 which contains the information required by Regulation 21 and that for the purposes of Regulation 24(1)(c) the main reasons and considerations on which the Planning Committee's decision was based shall be set out as in this report.
4. In the event that the requirements of paragraph 1 above are not met by 31 October 2015, the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 199.

BACKGROUND INFORMATION

Site location and description

5. The site measures approximately 0.47 hectares in size and sits approximately 90 metres south of the River Thames and 30 metres south east of the Tate Modern.

6. It is occupied by a single commercial building which is currently in office use. The existing building has three wings ranging in height from three to seven stories, connected by a central core/circulation space. The main frontage/entrance is located on Park Street which forms the west and north boundaries of the application site. Sumner Street and Emerson Street form the south and east boundaries respectively.
7. There is a small car park and service yard to the rear of the building that is accessed from Emerson Street and an additional basement car park for staff. Landscaping is limited to a small area in the south west corner of the site which contains a number of mature trees. The office space is leased to a range of small businesses. The building was originally designed for and occupied by The National Grid as their main control centre and headquarters.
8. The surrounding area is in mixed use including office, residential and cultural uses. To the north the site is bounded by an office building occupied by HSBC that extends along the northern side of Park Street. To the east the site is bounded by Emerson Street and the adjacent commercial buildings. The residential blocks of Sumner Buildings lie to the south across Sumner Street and the student accommodation block of Bankside House is located further to the south west on the corner of Sumner Street and Great Guilford Street. The Tate Modern and the (under construction) Tate extension are located opposite the site.

Details of proposal

9. Planning consent is sought to demolish the existing building and replace it with three new buildings linked by a single two level basement. In land use terms the proposal will include B1 office, residential, retail and a cultural facility. The proposed land use areas are detailed in the table below;

Land Use	Area (sqm - GIA)
Office	8,090
Residential	19,229
Retail (Class A1/A3/A4)	777
Cultural Space (D1/A1/A3/A4)	1,711
Ancillary space	6,207
Total	36,014

10. The development would be formed in three distinct blocks linked below ground by a single two level basement.
11. Block 1 is the office building which would extend to ten storeys in height. At ground floor level there would be two large retail units fronting Park Street and Emerson Street as well as associated plant and servicing including an internal servicing yard with turning circle accessed from Park Street. External terraces for the office building would be provided on floors 7 to 9. Block 1 would be located to the north of the site flanking Park Street however the main frontage of the office building and the main entrance to the office accommodation would be from within the site.
12. Blocks 2 and 3 are the residential towers which would rise to 15 and 19 storeys respectively. Together they would provide 163 residential units and the schedule of accommodation is detailed in the table below. Block 2 would be located adjacent to Emerson Street, just south of Block 1 across the newly formed Emerson Place. Block 3 would be located on the corner of Sumner Street and Park Street in the south west corner of the site. Blocks 2 and 3 would be linked at ground floor level by a single residential reception which separates the public realm on Emerson Place from the resident's gardens on Sumner Street/Emerson Street.

No of Bedrooms	No of Units	Size Range (sq.m)
Studio	8	36
1 Bed	56	50 to 61
2 Bed	56	82 to 106
3 Bed	41	122 to 197
4 Bed	2	480
Total	163	

13. Blocks 2 and 3 would also include retail at ground floor. Additionally Block 2 would accommodate a ground floor resident's lounge and the car lifts providing access to the basement levels. Block 3 would contain the entrance to the large cultural facility that would be located within basement level 1, which also accommodates a resident's spa, plant and the cycle parking/shower facilities for the office accommodation. Basement level 2 accommodates additional plant as well as all refuse storage, car parking and the residential cycle parking.
14. There are currently 11 trees on site and nine would be retained. None of the trees are subject to a Tree Preservation Order. Additional planting is proposed that would replace those that would need to be removed. The development would create a new route through the site in an east-west direction linking the planned new Tate Park with Emerson Street. This new route would be called Emerson Place and would include hard landscaping, dynamic fountains in the 'Water Gardens' and space for outside seating. In the south west corner of the site there would be a garden amphitheatre that would complement the cultural space as well as providing an outdoor seating area and an informal child play space. The south east corner of the site contains the resident's garden and a sculpture pavilion.
15. Revisions were submitted during the course of the application amending the detailed design of Block 1 to give more prominence to the entrance reducing the height of Block 3 by two storeys to minimise the impact on the view of St Paul's Cathedral from both Alexandra Palace and Camberwell Green/Camberwell Road.

Planning history

16. 04/AP/1820 Application type: Full Planning Permission (FULL)
 Replacement of existing office building with a new mixed use development comprising of:-
 Building A - Ground floor plus 23 upper floors for retail (A1/A3) use on ground and mezzanine and 113 flats (C3) on floors 1 to 22;
 Building B - Ground plus 7 upper floors for use as offices (B1) together with retail (A1/A2/A3) and community use at parts of basement and ground; and
 Building C - Ground plus 4 upper floors on the Sumner Street frontage to provide 25 flats (C3) together with a crèche or nursery (D1) on part of ground floor.
 The new buildings to have 2 basement levels providing 68 car spaces and cycle parking facilities and plant and the provision of a new public open space fronting Sumner Street.
 Decision date 07/03/2006 Decision: Refuse (REF) Appeal decision date: 17/04/2007
 Appeal decision: Planning appeal dismissed (DIS)
- LBS Reasons for refusal:
- 1). It is considered that the proposed tower (Building A), by reason of its location, height, scale and massing and its visual impact would adversely affect the character of the local area, the setting of the Tate Modern and views of the area from Southwark Bridge. The proposal is therefore contrary to the Policy E.2.2 'Heights of Buildings' of the Southwark Unitary Development Plan, Policy 3.13 'Urban Design' of the Revised Draft Southwark Plan (February*

2005), and Policies 4B.9 'Large scale buildings - design and impact' and 4B.17 'Assessing development impact on designated views' of the London Plan, February 2004.

2). *The proposed Buildings A and B, which are tall buildings as defined by Policy 3.20 of the emerging Southwark Plan, fail to make a positive contribution to the landscape, or relate well to their surroundings, and in the case of Building B do not demonstrate the highest architectural standard. Therefore the development fails to comply with the requirements of Policy 3.20 'Tall Buildings' of the Revised Draft Southwark Plan (February 2005) and Policy 4B.9 'Large-scale buildings - design and impact' of the London Plan.*

3). *The proposed development would have a detrimental effect upon the strategic view of St. Paul's Cathedral from Alexandra Palace. The proposal, given its proximity to St. Paul's, fails to protect the integrity of this view. The proposal is contrary to the Policy E.2.2 'Heights of Buildings' of the Southwark Unitary Development Plan and Policy 3.21 'Strategic Views' of the Revised Draft Southwark Plan (February 2005). It is also contrary to Regional Planning Guidance 3a, dated 1991, Policy 4B.17 of the London Plan, as well as the emerging the London View Management Framework Draft SPG.*

4). *The siting of the proposed tower (Building A) would adversely affect local views of St. Paul's from Great Guildford Street and would fail to contribute to the local environment and enhancement of the public realm. The proposal is therefore contrary to the Policy E.2.3 'Aesthetic Control' of the Southwark Unitary Development Plan and Policies 3.11 'Quality in Design' and 3.13 'Urban Design' of the Revised Draft Southwark Plan (February 2005).*

5). *The proposal would be an overdevelopment of this site resulting in an excessive height and density, with adverse impact upon the amenity of neighbouring properties. This would be contrary to Policies E.2.2 'Heights of Buildings', E.3.1 'Protection of Amenity' and H.1.7 'Density of New Residential Development' of the Southwark Unitary Development Plan, and Policies 3.1 'Environmental effects', 3.2 'Protection of Amenity', 3.10 'Efficient Use of Land', 3.13 'Urban Design' and 4.1 'Density of Residential Development' in the Revised Draft Southwark Plan (Feb. 2005).*

6). *The proposed development provides an unacceptable dwelling mix with too great a provision of one-bedroom flats and inadequate provision of flats with three or more bedrooms, thereby providing an inadequate mix of accommodation types and an inadequate provision of family sized accommodation. The proposal fails to meet the identified housing needs of the Borough, and therefore is contrary to Policy H.1.5 'Mix of New Dwellings' of the Southwark Unitary Development Plan and Policy 4.3 'Mix of Dwellings' of the Revised Draft Southwark Plan (February 2005)*

7). *The provision of affordable housing at 25 per cent of the total housing provision does not achieve the 40% per cent provision sought within the Central Activity Zone. The proposal will therefore fail to meet the recognised housing needs within the Borough, and is contrary to Policy 4.4 'Affordable Housing' of the Revised Draft Southwark Plan (February 2005) and Policy 3A.8 'Negotiating Affordable Housing' of the London Plan.*

8). *The proposed development would provide some residential accommodation that would have a poor arrangement and cramped layout that would result in unsatisfactory accommodation for future occupiers. This would be contrary to Policy H.1.8 'Residential Standards' of the Southwark Unitary Development Plan and the 'Standards, Controls and Guidelines for Residential Development' in Supplementary Planning Guidance, and Policy 4.2 'Quality of Residential Accommodation' in the Revised Draft Southwark Plan (Feb. 2005).*

Planning Inspectorate Reasons for refusal: In his summary on the appeal decision, the Inspector noted that the height of the buildings would take no account of the Tate Modern chimney, an element that defines the townscape. He further noted that such a tall building would have implications for the character of the area from both wider viewpoints and local streets, making particular reference to the interruption of the view of St Paul's Cathedral from Great Guildford Street and the importance this view has in establishing a local sense of place.

17. **14/AP/0528 Application type: Scoping Opinion (EIA) (SCP)**
Scoping Opinion for the redevelopment of the site to provide a mixed use residential, office and retail development with underground car parking and servicing, a landscaped public square and other works incidental to the development of the site.
Decision date 01/05/2014 Decision: Scoping Opinion - EIA Regs (SCP)

Planning history of adjoining sites

18. Application Reference 12/AP/3940: Sampson House and Ludgate House - GRANTED 28/03/2014

Demolition of existing buildings and the construction of a mixed use development totalling 144,571 sq.metres GEA comprising 492 flats (Class C3), 45,372 sq.m (including basement) of offices (Class B1), 2,581sqm of retail (Classes A1-A5), 1,969sqm of community uses (Class D1) and 1,014sqm of gym (Class D2). New open space including formation of two new east-west routes, new public square, reconfigured vehicular and pedestrian access and works to the public highway with associated works including landscaping and basement car park for 200 cars (including 54 disabled car parking spaces) plus servicing and plant areas. Change of use of the railway arches from a nightclub to retail, gym and community uses. Configuration of the toilet block for retail uses and toilets. This permission has not been implemented.

19. Application reference 12/AP/1784: 1-16 Blackfriars Road GRANTED 14/12/2012

Erection of a 50 storey tower, and a 4 and 6 storey building to provide a mixed use development comprising a hotel, 274 flats, retail space. This scheme is now in the early stages of construction;

20. Application Reference 11/AP/2566: Bankside House Sumner Street - GRANTED 26/03/2012

Demolition of eighth floor and mezzanine in order to construct a three floor extension to provide an additional 104 student rooms, associated minor facade alterations, access, landscape, public realm works and cycle storage. This permission has not been implemented and has now expired.

21. Application reference 09/AP/0039: Tate Modern - GRANTED 14/05/2009

Erection of an 11 level (70.4m AOD) 24,786sqm (gross external area) extension to Tate Modern to comprise Class D1 (non residential institution) use including display and exhibition spaces, performance spaces, education and learning facilities together with ancillary offices, catering, retail and other facilities, landscaping, external lighting, servicing, vehicle and cycle parking and associated works including works to the public highway and necessary demolition of outbuildings, annexes and structures. Construction is under way and the extension is 'topped out'.

22. Application reference 06/AP/1481: Bankside Industrial Estate (Neo Bankside) - GRANTED 19/06/2007

Demolition of existing buildings and erection of five buildings, one 6 storey, two 12 storey, one 18 storey and one 24 storey, each with two basement levels, to provide 229 residential flats on the upper floors, with retail (Class A1, A2, & A3) use at ground and basement levels; works of hard and soft landscaping including alterations to highways and access, with the provision of servicing areas and ancillary vehicle parking (92 car parking spaces) at land at Bankside Industrial Estate, 118 to 122 Southwark Street. Laying out of an area of open space, including the option of

construction of a small structure for community, cultural and/or recreational purposes (D1/D2) and/or any other purposes to facilitate and define use of the open space at the site of 44 Holland Street/47 Hopton Street. This development is now complete and occupied.

23. Application reference 02/AP/1799: 135 Park Street -GRANTED 18/02/2004

Demolition of the existing buildings and the erection of a basement, ground plus eight storey building for office use (Class B1) and use of part basement and part ground floor as dual retail (Class A1) and/or Class A3 (hot food) purposes. This permission was subject to a technical implementation although construction was not continued.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

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

- a) principle of the proposed development in terms of land use;
- b) affordable housing and the principle of off site provision and a payment in lieu;
- c) design issues, including site layout, scale/massing and impact on local and strategic views;
- d) housing mix, density and quality of accommodation;
- e) the impact on the historic setting of heritage assets;
- f) impact on the amenities of occupiers of adjoining properties;
- g) impact of adjoining and nearby uses on occupiers and users of the proposed development;
- h) flood risk;
- i) traffic issues, including level of car parking;
- j) archaeology;
- k) planning obligations;
- l) sustainable development implications;
- m) environmental impacts; and
- n) all other relevant material planning considerations.

Planning policy

25. The statutory development plans for the Borough comprise the National Planning Policy Framework 2012, London Plan 2015, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007 - July).

26. The site is located within the:

- Central Activities Zone (CAZ)

- Bankside, Borough and London Bridge Opportunity Area
 - Borough, Bermondsey and Rivers Archaeological Priority Zone
 - Air Quality Management Area
 - Borough and Bankside District Town Centre
 - Bankside, Borough and London Bridge Strategic Cultural Area
 - The Thames Policy Area.
27. It has a Public Transport Accessibility Level (PTAL) of 6b where 1 is the lowest level and 6b the highest.
28. The following listed structures are adjacent to the site:
- Union Works (Grade II);
 - Post at the west corner of Bear Gardens (Grade II); and
 - Post at the west corner with Rose Alley (Grade II).
29. The Grade I listed Southwark Cathedral lies to the east of the site at a distance of approximately 470m
30. The following conservation areas are adjacent to the site:
- Bear Gardens - approximately 10 metres northeast of the site
 - Thrale Street - approximately 70 metres east of the site
31. The following conservation areas lie within the surrounding area:
- Union Street - approximately 160m south east of the site
 - Borough High Street which lies 210 metres to the south west
32. The application site lies within the LVMF protected view of St Paul's Cathedral from Alexandra Palace. Other important local views include the view of St Paul's Cathedral from Camberwell Green/Camberwell Road and Great Guildford Street as well as the view of the Southbank from the Millennium Bridge.
33. This application should be determined in accordance with the development plan unless material considerations indicate otherwise; and the following national framework, regional and local policy and guidance are particularly relevant:

National Planning Policy Framework (the Framework)

The NPPF came into effect on 27 March 2012 and is a material planning consideration. Relevant sections are:

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

London Plan July 2011 consolidated with further alterations March 2015

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 3.14 Affordable housing thresholds
Policy 3.18 Healthcare facilities
Policy 3.19 Education facilities
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 7.7 Location and design of tall and large buildings
Policy 7.8 Heritage assets and archaeology
Policy 7.11 London View Management Framework
Policy 7.12 Implementing the London View Management Framework
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

Core Strategy 2011

The relevant policies of the Core Strategy are:
Strategic Targets Policy 1 - Achieving growth

Strategic Targets Policy 2 - Improving places
Strategic Policy 1 - Sustainable development
Strategic Policy 2 - Sustainable transport
Strategic Policy 3 - Shopping, leisure and entertainment
Strategic Policy 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

Southwark Plan 2007 (July) - saved policies

The Council's cabinet on 19 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.

The relevant saved policies include:

Policy 1.1 Access to Employment Opportunities
Policy 1.4 Employment Sites
Policy 1.7 Development within Town and Local Centres
Policy 2.5 Planning Obligations
Policy 3.1 Environmental Effects
Policy 3.2 Protection of Amenity
Policy 3.3 Sustainability Assessment
Policy 3.4 Energy Efficiency
Policy 3.6 Air Quality
Policy 3.7 Waste Reduction
Policy 3.9 Water
Policy 3.11 Efficient Use of Land
Policy 3.12 Quality in Design
Policy 3.13 Urban Design
Policy 3.14 Designing Out Crime
Policy 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites
Policy 3.19 Archaeology
Policy 3.20 Tall Buildings
Policy 3.28 Biodiversity
Policy 3.29 Development within the Thames Policy Area
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

Supplementary Planning Documents

Affordable Housing SPD September 2008 and draft 2011
Bankside, Borough and London Bridge Draft SPD February 2010
Design and Access Statements SPD September 2007
Residential Design Standards SPD October 2011
Section 106 Planning Obligations and CIL SPD 2015
Sustainability Assessment 2009
Sustainable Design and Construction SPD February 2009
Sustainable Transport Planning SPD September 2010

Greater London Authority Supplementary Guidance

Housing SPG 2012 (SPG to the London Plan)
London View Management Framework 2012 (SPG to the London Plan)
Providing for Children and Young People's Play and Informal Recreation 2008 (SPG to the London Plan)
Use of planning obligations in the funding of Crossrail 2010

Principle of development

34. 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.
35. 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.
36. 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

37. The London Plan designates Bankside, Borough and London Bridge as one of four Opportunity Areas in the London South Central area.
38. The London Plan notes that this area has considerable potential for intensification and scope to develop the strengths of the Area for strategic office provision as well as housing, especially in the hinterland between Blackfriars and London bridges. Mixed leisure and culture related development should enhance its distinct offer as part of the South Bank Strategic Cultural Area
39. Strategic Targets Policy 2 of the Core Strategy underpins the London Plan and states that Southwark's vision for Bankside, Borough and London Bridge is to continue to provide high quality office accommodation, world-class retail, tourism, cultural and entertainment facilities including the delivery of 1900 new homes, 665 affordable homes and around 25,000 new jobs by 2026.

Central Activities Zone and Borough and Bankside District Town Centre

40. 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.

41. 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.

Bankside, Borough and London Bridge SPD 2010

42. The Council consulted on the above SPD in February 2010 and again in September 2010. Further work on the above SPD has been on hold while the Bankside Neighbourhood Forum prepares a Neighbourhood Plan in line with the Government's Localism Act. Following this, the intention is to review the SPD in collaboration with the GLA and produce a joint document which the Mayor of London can endorse as an Opportunity Area Planning Framework (OAPF). As such, the current draft SPD would have limited weight in decisions on planning applications due to its early stage in the adoption process and likelihood of revisions being made to the current document.

Bankside, Borough and London Bridge Strategic Cultural Area

43. The Strategic Cultural Area recognises the concentration of existing attractions within the north of the borough and links in with other attractions in Lambeth, Westminster, the City and Tower Hamlets. The area has been designated to protect and enhance the provision of arts, culture and tourism.

Conclusion on policy designations

44. The principle of a large scale development containing a mix of uses including retail, offices and cultural uses 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.

Reprovision of office floorspace

45. The site falls within the CAZ, which contains London's geographical, economic and administrative core. The London Plan does not protect office floorspace in the CAZ, it simply identifies office use as an appropriate land use in the CAZ and notes that there is capacity for 25,000 jobs in the Opportunity Area.
46. 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.
47. 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.
48. The buildings are partially occupied, and the site is suitable for continued office use. The existing floorspace amounts to 10,785sqm (GIA). As proposed, this would reduce to 8,090sqm (GIA), resulting in a loss of 2,695sqm. However, the specialist design of the existing building and the fact that large areas are unusable as they were designed specifically for the plant required by the National Grid Control Room is a material consideration in determining whether the level of replacement office space is acceptable.
49. The existing office accommodation has deep, inefficient floorplans, poor distribution of windows and natural light and illegible access and circulation. As such it would not meet the expectations of modern office users.
50. The replacement offices would be modern, high quality and more efficiently laid out and thus would be much more attractive to office users. Whilst there would be a reduction in overall floorspace, the design and layout improvements would result in a more efficient office floorspace and a higher quality office environment with a greater overall employment potential than the existing building. Additionally, there are significant amounts of retail and cultural floorspace being provided which are town centre uses as defined by category (c) of policy 1.4 outlined in paragraph 56 above. These areas, when taken together with the new office floorspace, result in only a very small overall loss of around 200sqm of employment space on the site, thus broadly satisfying the terms of saved policy 1.4. In order to ensure the timely delivery of the office floorspace to meet the strategic objectives of providing employment floorspace, any permission issued should include a condition that requires the office building to be constructed in advance of the residential buildings with the office space available for occupation prior to the occupation of any dwellings.

Retail uses

51. The development would include new retail units (A1/A3/A4) at ground floor level of all three of the new buildings. In total, 777sqm (GIA) of retail floorspace is proposed, which would off-set 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.
52. The retail units would activate the ground floor of the development, particularly along the Park Street frontage, 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 with retail opening out onto the newly formed public realm with opportunities to provide tables and chairs outside, encouraging visitors to stay for longer periods. The amount and scale of provision is considered to be acceptable and would help to meet the needs of residents, workers and visitors in the area.

53. In order to protect the amenities of the area, it is suggested that a cap be placed on the amount of floorspace that could be used for Classes A4-A5 (drinking establishments and hot food takeaways). A condition is attached to this effect.

Cultural space

54. The proposal would include the provision 1,711sqm (GIA) of cultural floorspace within basement level 1, accessed from a large ground floor reception in Block 3. The provision of cultural space is supported given the Strategic Cultural Area designation and accordingly is a positive aspect of the scheme. Additionally, D1 is a Town Centre use and as such is appropriate as an alternative to office accommodation in line with category (c) of saved Southwark Plan policy 1.4 and as such offsets the loss of office space.
55. At the time of writing, no cultural user has been secured although it is acknowledged that the Globe have expressed a very strong interest in taking over this space.
56. Further details would be secured by the Legal agreement in relation to the level of fit out of the space and the extent to which the space could be made available to local groups. Local groups such as Better Bankside and the Tate may want to be involved in the process of finding suitable tenants should the Globe decide not to pursue their interest, this would ensure that the cultural offer complements the attractions found nearby and will be secured in the Legal Agreement.
57. It is noted that the applicant seeks a flexible consent for the cultural space to allow for A1/A3 or A4 in the event that they are unsuccessful in finding a tenant for the cultural facility. Whilst there are no objections to the proposed A class uses, the Legal Agreement should include provisions to require a proper search for a cultural user, in order to maximise the benefits to the Strategic Cultural Area.

Provision of housing

58. The proposed development comprises 163 new homes. The provision of residential accommodation is supported by the London Plan, the saved Southwark Plan and the Core Strategy.
59. London Plan Policy 3.3 - Increasing Housing Supply sets a minimum target of 27,362 additional homes to be provided in Southwark over a period from 2015-2025. A specific target of 1,900 homes is given for the Opportunity Area. 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.
60. The proposed 163 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.

Conclusions on land use

61. The proposal involves a reduction in office floorspace on the site. However, the site lies within a district Town Centre and the proposed retail and cultural space are acceptable uses to make up the shortfall, and with these uses in place there would be only a very small net loss of employment floorspace. Additionally, the replacement office building would provide high quality, efficient modern offices with active ground

floors. The high quality office spaces are capable of attracting new employers to Southwark, enhancing the employment potential of the area and could provide up to 700 new jobs. As such, the loss of the office space is acceptable in policy terms and it facilitates the provision of a mixed use scheme including new housing.

62. The proposed development includes a mix of uses that are considered to be appropriate for the sites location within the CAZ, Opportunity Area, Strategic Cultural Area and district town centre. As well as the retail and cultural uses, which will support the cultural and visitor functions of the area, it will provide a significant number of new homes, which is a priority of the current Government as well as local and London-wide planning policies.

Environmental impact assessment

63. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary, depending on whether they are found in Schedule 1 (mandatory) or Schedule 2 (discretionary) of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (the 'EIA Regulations'). The applicants did not submit a request for a Screening Opinion therefore the submission of the EIA is discretionary.
64. In this case, the proposal does not exceed the site area threshold for 'Urban Development Projects' however it was considered that the development has the potential to generate significant environmental effects by virtue of its size, based on a review of the Schedule 3 selection criteria for screening Schedule 2 Development.
65. Prior to the submission of the planning application, the applicant requested a 'Scoping Opinion' under Regulation 10 of the EIA Regulations (then 1999) to ascertain what information the Local Planning Authority considered an Environmental Statement (ES) should include (ref: 14/AP/0528).
66. Regulation 3 of the EIA Regulations 2011 precludes the granting of planning permission unless the Council has first taken the 'environmental information' into consideration. The 'environmental information' means the ES, including any further information, any representations made by consultation bodies, and any other person, about the environmental effects of the development.
67. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a Non-Technical Summary, Environmental Statement and Technical Appendices accompanies the application.
68. Following mitigation measures, there are likely to be some adverse impacts as a result of the development with regards to daylight and overshadowing, townscape (in relation to the views of St Pauls Cathedral), transport and air quality (both owing to construction activities). However, the impacts are not significant enough to warrant refusal of the application. Information on specific impacts are included, where relevant, in the various sections of this report.

Affordable housing

69. The applicant seeks to meet the requirement to provide affordable housing by providing off-site affordable housing in the form of a fully affordable Extra Care housing facility on a site at 96-114 Southwark Park Road. This affordable housing scheme is at an advanced stage of design however it does not have planning consent and an application for planning permission has not yet been submitted. Some pre-application discussions have taken place, and the draft scheme, by a Stirling Prize winning architectural practice, is high quality in terms of both the quality of

accommodation and the architectural design. The developer is close to concluding the acquisition of the site from the Council. However, the final form of the scheme, and the number of units it could provide, are not yet resolved. In addition to the proposed units at Southwark Park Road, the applicant is offering an in lieu payment, which would be used by the Council to deliver additional affordable housing units as part of the Council's Direct Delivery programme.

70. In determining whether the affordable housing provision is acceptable, two key issues need to be addressed. Firstly, whether the provision of affordable housing off-site, and through an additional in lieu payment, is justified in the special circumstances of the case, and secondly, whether the amount of affordable housing being provided is the maximum that the scheme can support whilst remaining viable and deliverable.

Policy context

National

71. 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.

Regional

72. The regional policies and guidance relating to affordable housing are set out in the London Plan and the Mayor's housing supplementary planning guidance (2012). The London Plan forms part of the development plan for Southwark. The key relevant policies within the London Plan in relation to this aspect of the application are:
73. Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes:

Part A of the policy requires that the maximum reasonable amount of affordable housing should be sought with regard to a number of factors including:

- current and future requirements for affordable housing
- the need to encourage rather than restrain development
- the need to promote mixed and balanced communities
- the specific circumstances of individual sites
- resources available to fund affordable housing, to maximise affordable housing output and the investment criteria set by the Mayor
- the priority to be accorded to provision of affordable family housing

Part B of the policy sets out that negotiations on sites should take account of their individual circumstances including development viability.

Part C of the policy sets out that affordable housing should normally be provided on-site. In exceptional cases where it can be demonstrated robustly that this is not appropriate in terms of the policies in this Plan, it may be provided off-site. A cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies in this Plan and should be ring-fenced and, if appropriate, pooled to secure additional affordable housing either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing.

74. The supporting text in paragraph 3.74 repeats part C of the policy setting out that in exceptional circumstances an off-site or cash in lieu contribution may be accepted. Where a cash in-lieu contribution is acceptable the text sets out that it should be ring fenced, and if appropriate 'pooled', to secure efficient delivery of additional affordable housing on identified sites elsewhere. These exceptional circumstances include those where, it would be possible to:
- secure a higher level of provision
 - better address priority needs, especially for affordable family housing
 - secure a more balanced community
 - better sustain strategically important clusters of economic activities, especially in parts of CAZ.

Local

75. The local policies are saved Southwark Plan Policy 4.4 Affordable housing, and Core Strategy Strategic Policy 6 – Homes for people on different incomes. Further guidance on how to implement the policies is contained within the Council's adopted Affordable Housing SPD 2008 and draft Affordable Housing SPD 2011.
76. Core Strategy Strategic Policy 6 'Homes for people on different incomes' requires as much "affordable housing on developments of 10 or more units as is financially viable". It also sets a minimum target of 8,558 net affordable homes between 2011 and 2026. It requires a minimum of 35 per cent of affordable housing on developments with 10 or more units.
77. Saved Southwark Plan Policy 4.4: Affordable housing is used alongside the overarching Core Strategy policy 6. Parts iv) and vi) of the policy require that:
- iv). the affordable housing provided must be an appropriate mix of dwelling type and size to meet the identified needs of the borough.
 - vi). A tenure mix of 70:30 social rented: intermediate housing ratio for the Central Activities Zone.
78. The Council's adopted Affordable Housing SPD 2008 (Section 3.6) together with the draft Affordable Housing SPD 2011 (section 6.3) clarifies the Southwark Plan and Core Strategy policy framework and sets out the approach in relation to securing the maximum level of affordable housing from developments. Specifically, it sets out the sequential tests relating to the delivery of affordable housing as:
- On site provision: All housing, including affordable housing should be located on the development site.
 - Off site provision: In exceptional circumstances, where affordable housing cannot be provided on site or where it can be demonstrated that significant benefits will be gained by providing units in a different location in the local area, the affordable housing can be provided on another site.
 - In lieu payment: In very exceptional circumstances where it is accepted that affordable housing cannot be provided on-site or off-site, a payment towards the delivery of affordable housing will be required.
79. It is therefore expected that the applicant demonstrate that the steps as set out above are followed in order to demonstrate that exceptional circumstances exist sufficient to justify the provision of an off-site affordable housing solution with a top-up in lieu payment. The SPDs make it clear that a financial appraisal must be submitted to justify any off-site provision or in lieu contribution. As set out in paragraph 6.3.9 of the draft 2011 SPD the appraisal must justify that at least as much affordable housing is

being provided as would have been provided if the minimum 35% affordable housing requirement were achieved on-site.

80. In line with SPDs, a financial appraisal was submitted to allow an assessment of the maximum level of affordable housing that could be supported by the development. The appraisal was reviewed by the District Valuer (DVS) on behalf of the Local Planning Authority. Following the review of the appraisal and the assessment of a number of options testing affordable housing delivery, it has been concluded that based on the development plan as a whole, the best approach is for affordable housing to be provided off site with a top-up in lieu payment to be made. This is discussed in detail below.

The justification for providing affordable housing off-site

81. The NPPF, London Plan and local policies all set out that in exceptional circumstances (the local policy refers to “very exceptional” circumstances) the provision of off-site affordable housing and/or a commuted sum may be acceptable in lieu of on-site affordable housing.
82. The application site at 185 Park Street benefits from some of the highest land and development values in the Borough. Housing is being provided in the form of two towers, each with a single core. For affordable housing to be provided within either of the towers, an additional core would need to be provided to serve the affordable units. This is a space intensive solution that would result in a substantial area of each floor being taken up by service and circulation space and would reduce the overall number of flats on site. The provision of on-site affordable housing would thereby reduce the efficiency of the site and the number of homes capable of being provided. Allowing an off-site solution will enable the towers to proceed with a single core and efficient floor layouts that could maximise the residential quantum on site. This would result in a higher total capital receipt to the developer. The Financial Viability Appraisal allows this additional value to positively impact on the amount of affordable housing which can be delivered by the scheme. Ultimately, more affordable housing can be delivered through off-site (and through the top-up in lieu payment) than would be possible if it were incorporated on-site. This satisfies the test in London Plan policy 3.12 that off-site and in lieu provision secures a higher level of overall provision of affordable housing.
83. Policies in both the London Plan and Southwark's own documents refer to the need for affordable general needs housing. Whilst this is a widely recognised priority, there is also a specific need in Southwark for specialist accommodation for the elderly. The site in Southwark Park Road would deliver around 56 units of 'Extra Care' housing for elderly residents, all of which would be affordable.
84. The Affordable Housing SPD states that, in very exceptional cases where it is justified and accepted that affordable housing can not be built on-site as part of a development, the off-site provision is required to be built on another site near the development. The off-site affordable housing should be built and ready for occupation at the same time as the on-site market housing. The off-site affordable housing is additional to the affordable housing that would need to be provided on the identified site in any case. For off-site provision, planning permission should have been granted for the development of housing on the site/sites identified for the off-site affordable housing or a planning application submitted for the off-site affordable housing provision at the same time as the application for the facilitating development.
85. The Southwark Park Road site is located in the north of the borough and provides a clear opportunity to provide a much needed 'Extra Care' facility with an established operator. Whilst an application has not yet been submitted the applicants are close to

completing the acquisition of the site, and have an agreement with United St Saviours Charity to deliver and manage the completed development. This commitment would be enshrined in the s106 agreement. However, the agreement would also need to include provision that, in the event that, despite all reasonable endeavours it is not possible to deliver the Southwark Park Road scheme, then the applicants will be required to undertake a detailed site search for an alternative site for affordable housing. As an option of last resort, then should the off-site affordable housing not be delivered within a certain timeframe then a mechanism will be in place to allow an in lieu payment to be made towards affordable housing.

86. The site in Southwark Park Road could not accommodate the full requirement for affordable housing generated by the 185 Park Street development. The DVS, in reviewing the submitted appraisal, concluded that the development could support additional provision. It is therefore recommended that an in lieu payment also be secured; this issue is discussed further below.

In-lieu payment

87. As detailed above, the quantum of affordable housing that could be provided on the Southwark Park Road site is not sufficient to meet the affordable needs of the 185 Park Street development as well as the 35 per cent affordable housing the site would be expected to provide in addition to this. The applicant proposes to make up this difference by way of an in lieu payment.
88. In order to support the proposed approach to affordable housing delivery, the applicants have submitted a Financial Viability Appraisal that has been reviewed by the District Valuer Service on behalf of the Council. The DVS concluded that the scheme could support affordable housing to the value of £30 million. The applicant has also submitted a build cost summary for the Southwark Park Road scheme. This was also reviewed for the Planning Authority, and this review found that the costs, including the costs of acquiring the site, were broadly reasonable. The Southwark Park Road scheme is a high quality building, which is expected to cost in the region of £28.5 million to provide, including a contribution of £5 million from the end user, the United St Saviours Charity. In effect, the cost to the developer of 185 Park Street is around £23.5 million. It is clear therefore that the development of 185 Park Street could support more affordable housing than would be provided in Southwark Park Road. The additional amount that the scheme could support is unlikely to be sufficient to provide a cost-effective housing development on its own. It is therefore recommended that it would be appropriate to accept this 'balancing' sum as an in lieu payment to be pooled with other funds to support the Council's Direct Delivery programme.
89. The Council's commitment to build a further 11,000 council homes over the next 30 years enables the Council to provide new genuinely affordable homes to a quality and type which meets the priority needs.

Determining the appropriate amount of affordable housing

90. The development at 185 Park Street includes units that are much larger than 'standard' flats. All rooms larger than 27.5sqm have been counted as two habitable rooms in line with policy. In addition, rooms which are far greater in size than 27.5sqm have been counted as multiple habitable rooms as agreed with the applicant in order to ensure a reasonable approach to the calculation of affordable housing requirement. Under this method, the development will provide the equivalent of 670 habitable rooms and the 35 per cent affordable housing requirement would equate to 235 affordable habitable rooms.

91. When providing affordable housing off-site, consideration must be given to the level of affordable housing need that the identified site would have generated in its own right. The Affordable Housing SPD makes it clear that, in normal circumstances, the level of affordable housing required through off-site delivery must make allowance for the 35 per cent affordable housing required as a base level on the recipient site. To be policy compliant as an off-site affordable housing solution the proposed site must provide the 35 per cent affordable housing generated by 185 Park Street as well as the 35 per cent required in its own right.
92. The Core Strategy requires developments to provide as much affordable housing as is financially viable and the London Plan requires the maximum reasonable amount. The off-site affordable housing at 96-114 Southwark Park Road will provide around 56 flats, all of which would be social rent 'Extra Care' flats. In the current pre-application submission, this equates to 202 habitable rooms of affordable housing. This figure takes into account an allowance for rooms above 27.5 sq.m and an allowance for communal rooms and shared facilities. If it was assumed that this development would have generated a requirement in its own right for 35 per cent affordable housing, this would reduce the number of affordable habitable rooms being provided through 185 Park Street to 131. The development at 185 Park Street generates a requirement for 235 rooms of affordable housing. Therefore the Southwark Park Road site would provide 131 of the 235 affordable habitable rooms required by the Park Street development.
93. In response to the shortfall, the applicant has offered an in lieu payment. The viability appraisal concluded that the maximum sum that the development at Park Street could support was £30 million. Evidence has been submitted to demonstrate that, based on the current pre-application proposal, it would cost the developer £23.5 million to deliver the 202 habitable room equivalents in Southwark Park Road (taking into account an additional contribution from the end user). As such, they have offered an in lieu contribution of £6.5 million to deliver affordable housing elsewhere in the borough. This is considered to be the maximum that the scheme can support, and therefore satisfies the requirements of the London Plan, Southwark Plan and Core Strategy.
94. It is recognised that the Southwark Park Road development has not yet been submitted as a formal application, and so has not been subject to statutory consultation or comprehensive assessment, and the Council has received only limited information relating to its impact on neighbours. It may be necessary to modify, or reduce the scale of the scheme, in order for it to secure planning permission. If this were to be necessary, and the number of habitable rooms is reduced, then the s106 agreement would secure a larger in lieu payment. This would be calculated on the basis of £127,660 per room defaulted. Similarly, if it were not possible to deliver the Southwark Park Road scheme (despite the developer's reasonable endeavours to secure planning permission) then the developer would be obligated to search for alternative affordable housing sites in the vicinity, and to deliver those.

Conclusions on affordable housing

95. It is recommended that, in the exceptional circumstances of the case, the provision of affordable housing off site (with an additional in lieu payment) is appropriate, and will maximise the amount of affordable housing the development can provide. The off-site affordable proposal at Southwark Park Road would deliver high quality 'extra care' housing for the elderly, thus meeting a recognised priority need in the borough. The Council would have nomination rights to these new units, which would be let on social rent terms. As well as providing specialised housing for the growing elderly population, it will enable larger units elsewhere in the borough to be released for family use. The developer would commit to early delivery of the Southwark Park Road scheme, which is a particular benefit of the proposal.

96. It is recognised that the proposal for Southwark Park Road has not yet received planning permission. Therefore, the assumptions about the number of habitable rooms must be treated with some caution. It is recommended that the s106 agreement secures additional in lieu sums in the event that the number of affordable habitable room equivalents in Southwark Park Road falls below 202.
97. The top-up in lieu payment of £6.5 million, which represents the difference between the build costs of the Southwark Park Road scheme and the maximum reasonable amount of affordable housing that the Park Street development can support, is considered acceptable and officers are satisfied that this accords with policy requirements. In the event that the developer could not deliver Southwark Park Road, the applicant would be required to undertake a comprehensive site search to identify alternative sites and a further in lieu payment would only be appropriate once all alternative options had been exhausted.

Housing mix and density

Unit type

98. Strategic Policy 7 of the Core Strategy expects 60 per cent of developments to have more than two bedrooms and in this area of the CAZ at least 20 per cent 3 or more bedrooms. A maximum of 5 per cent as studios and only for private housing. At least 10 per cent of the units should be suitable for wheelchair users. The mix of units provided is shown in the table below.

No of Bedrooms	Total Units (number)	Total Units (%)
Studio	8	5%
1 Bed	56	34%
2 Bed	56	34%
3 Bed	41	25%
4 Bed	2	1%
Total	163	

99. 60 per cent of units would have two or more bedrooms; this meets the 60 per cent target. 26 per cent of the units would have three or more bedrooms which exceeds the 20 per cent target and will provide much needed family housing. The numbers of studios proposed, at 5 per cent, would not exceed the 5 per cent maximum and therefore is acceptable.
100. In terms of wheelchair accommodation, 11 per cent (18 units) would be provided. The units would be provided in Block 2 and would all be two bedroom units. This is considered acceptable.

Density

101. 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.

102. The development as a whole would have a density of 2688 habitable rooms per hectare. Since the maximum upper limit of 1100hrh would be significantly exceeded, the development would need to demonstrate that it would be excellent in relation to housing quality. If it can be demonstrated that an excellent standard of accommodation would be provided, and the response to context and impact on amenity to existing occupiers is acceptable, then it is considered that the high density in this Opportunity Area location would not raise any issues to warrant withholding permission. There are a number of high quality and high density schemes in the area, most notably the redevelopment of Sampson House and Ludgate House as well as the One Blackfriars development. The principle of the high density of the proposal is considered appropriate given the local context and the high PTAL (6B). The design and accommodation quality will be discussed further below.

Quality of accommodation

Unit size

103. 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.
104. 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 (sq.m)	Size Range (sq.m)
Studio	36	36
1 Bed (flat)	50	50-61
2 Bed (flat)	61-66	82-106
3 Bed (flat)	74-85	122-197
4 Bed (flat)	90-95	480

105. The flat sizes comfortably meet and in most cases significantly exceed the standards as set out in the SPD. In terms of aspect 70 per cent of the units would be dual aspect and of the 49 units (30 per cent) which are single aspect, none are north facing and all single aspect units enjoy east or southern aspects which is positive. Space has been allocated for storage and all kitchens enjoy natural light and ventilation. Overall, it is therefore considered that the flat sizes and layouts are acceptable, and would provide for a very good standard of internal amenity.

Internal daylight

106. Of the 542 habitable rooms tested within the proposed development, 81 per cent meet or exceed the required minimum Average Daylight Factor for the room type. 96 per cent of all tested rooms achieve the recommended No Sky Line (NSL). Of the 107 rooms falling short of ADF, a large number either:
- i) are not the primary living area (36 are bedrooms); or
 - ii) are living areas that, whilst falling short of the ADF recommended levels, meet the recommended levels of NSL;
 - iii) or are open plan kitchen/living/dining rooms which achieve the recommended levels of ADF for a living room (1.5 per cent) but fall short of those recommended for a kitchen (2 per cent). This is the case for 25 living/kitchen/diners.

107. It is therefore considered that the proposed units would achieve a good standard of internal daylight.

Overlooking

108. The distance between the southern face of Block 1 and the northern face of Block 2 falls short of the minimum requirement of 12 metres across highways, with a distance of 8 metres apart at their closest point (measuring from the face of the building as opposed to the edge of the balconies). There was a concern that this would have an adverse impact on the amenity of the future occupiers of the north facing units of Block 2 however these units face onto the main core of Block 1 where there would be limited opportunity for overlooking due to the form of the building and the materials employed on this part of the facade.

Amenity space

109. 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 sq.m per child bed space (covering a range of age groups).

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

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

111. All units would have access to private amenity space as detailed in the table below:

No of Beds	No of Units	Amenity Space (sq.m)	Amenity Shortfall (sq.m)
Studio	8	8-9	15
1 Bed	56	8-12	50
2 Bed	56	10-21	30
3 Bed	41	7-90	14
4 Bed	2	169-191	0
Total	163		109

112. Balcony areas are generally very generous, but of the 41 three bedroom units that are proposed eight would not meet the minimum 10sq.m private amenity space requirement. The shortfall ranges are 3sq.m (one unit), 2sq.m (four units) and 1sqm (three units). These shortfalls are considered to be fairly minor in the context of the generally very large balconies and the overall high quality of accommodation. In all cases the private amenity space shortfalls have been accumulated and will be

provided as part of the communal amenity space.

Communal amenity space

113. In terms of communal amenity space, the proposal includes a resident's lounge at ground floor within Block 2, a residents garden measuring 315sq.m that would comfortably accommodate the 50sq.m requirement for each residential block as well as the 109m shortfall from the private amenity space. The resident's garden is located at ground floor with level access and is south facing to ensure that it will be a well lit and pleasant open space. The space is for use by both new residents, and is also open to the public.

Children's play space

114. Children's play space would be provided within the following areas:

- (i) the 'Water Gardens' on Emerson Place (141sq.m)
- (ii) the Garden Amphitheatre (134sq.m)

115. In line with the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG the development would be required to provide 197.4sq.m of children's play space. Between the Water Gardens and the Garden Amphitheatre a total of 275sq.m of informal child play space within the public realm would be provided. Although this does not provide dedicated formal child's play facilities, it will provide a range of attractive informal play environments.

116. It is noted that the Water Gardens and the Garden Amphitheatre are suitable for the under 5's and the 5 to 11 age groups. No provision has been made within the site for the 12+ age group which has a requirement of 110sq.m of play space. On balance this is considered acceptable given the close proximity to the Southbank, the planned Tate Park and the surrounding cultural offerings as well as the large residents lounge within the ground floor of Block 2 overlooking the residents gardens and sculpture pavilion. Additionally a payment of £16,610 will be made, in line with the S106/SCIL SPD towards improving and supporting other open spaces in the vicinity.

Conclusion on amenity space

117. Overall, the amount of amenity space is considered acceptable. Whilst there are 8 three bedroom flats that do not meet the 10sq.m requirement for private amenity space, the amount and variety of communal and children's play space is considered positive and in addition, an internal resident's amenity space is provided in the development for other social uses.

Impact on the amenities of adjoining properties

Daylight

119. 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.
120. 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 per cent 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 per cent of their original value before the loss is noticeable.

121. 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 per cent in the area of sky visibility, daylight may be affected.
122. 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 per cent for kitchens, 1.5 per cent for living rooms and 1 per cent 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.
123. The daylight report has considered a large number of rooms around the site. It assessed 385 windows for daylight amenity, which serve 158 rooms at 60 Park Street, 1 to 30 and 71 to 100 Sumner Buildings and Bankside House. Of the 385 windows assessed 252 (65 per cent) would satisfy the BRE recommended levels for VSC. Of the 158 rooms assessed, 11 (93 per cent) would meet the BRE standards for NSL. A more localised assessment is detailed below.

60 Park Street

124. There are a total of 26 rooms and 128 windows in this building that have been assessed. In terms of the 128 windows assessed, 114 would satisfy BRE criteria in relation to VSC. The remaining 14 windows would lose more than 20 per cent. Of the 26 rooms assessed, 25 would satisfy BRE criteria in relation to NSL. Whilst there are a number of windows that will lose more than 20 per cent VSC it is noted that 25 of the 26 rooms will pass the NSL test and as such the impact of the development on these properties is considered to be negligible.

1-30 Sumner Buildings

125. A total of 65 rooms and 110 windows within this building have been assessed. It is noted that all 110 windows will fail the VSC test with losses in the range of 20.2 per cent to 59.66 per cent. 89 of these windows previously had a VSC level in excess of 27 per cent and will experience a greater than 20 per cent reduction in VSC. The remaining 21 windows had existing VSC levels below 27 per cent and will also experience more than a 20 per cent reduction. All of the rooms affected are north facing bedrooms.
126. Of the 65 rooms assessed against the NSL criteria, 10 would fail to meet the BRE standards. The remaining 55 however would exceed the minimum NSL standards. All of the affected rooms and windows serve bedrooms. It is recognised that bedrooms are generally less sensitive to reductions in daylight. As such, whilst it is recognised that this impact is significant, it is considered to be acceptable on balance as a reduction in daylight levels to these bedrooms is not considered to reduce their functionality or amenity levels to a detrimental level.

71-100 Sumner Buildings

127. All windows and rooms assessed within this building meet the BRE standards for VSC and NSL.

Bankside House

128. This building is a student housing block. 25 rooms and 65 windows were assessed. Of the windows assessed a total of nine will experience a noticeable loss of VSC. Seven of the nine will have a loss of VSC greater than 20 per cent but will still continue to have at least 27 per cent VSC and as such can be considered well lit. The remaining two will have a reduction of more than 20 per cent VSC. All 25 rooms meet the BRE NSL standards. The impact on daylight at this building is considered to be acceptable.

Conclusions on daylight

129. The results of the daylight assessment do reveal that there would be a number of rooms that would not meet the relevant day lighting standards of the BRE, with those flats to the south of the site particularly affected (1 to 30 Sumner Buildings). The ES has categorised losses of 20.29.9 per cent VSC as minor adverse, 30 to 39.9 per cent VSC as moderate adverse and any losses exceeding 40 per cent VSC as major adverse. In this respect there are 79 (47 rooms) windows that will experience a loss of more than 40 per cent VSC and officers agree that this would be a major adverse impact.
130. However, the proposed development does provide for gaps between the buildings, which would allow flats to obtain views and glimpses through the buildings. Additionally, all of the affected rooms at Sumner Buildings are bedrooms which are considered to be less sensitive to reductions in daylight. The site layout would also allow for these flats to obtain views of the open spaces within the development, such as the residents garden and the Sculpture Pavilion and therefore this is considered to represent an improvement over the existing situation. In addition, 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.
131. In conclusion, it is considered that whilst the impacts to some rooms would fail to meet the relevant standards of the BRE, other factors such as the gaps through the buildings, the views of open spaces and the improvement to the urban environment and public realm should be given weight, and accordingly would be sufficient to consider the level of impact, on balance, acceptable.

Sunlight

132. All of the windows within 90 degrees of due south have been assessed with regards to impact on sunlight. The BRE guide states that if a window can receive 25 per cent of summer sunlight, including at least 5 per cent of Annual Probable Sunlight Hours between 21 September and 21 March, then the room would be adequately sunlight. A reduction in APSH of more than 20 per cent is considered to be an adverse impact.
133. In this case the only affected residential windows that face within 90 degrees of due south are located within the building at 60 Park Street. A total of 108 windows have been assessed for sunlight and 22 (20 per cent) would have a reduction in APSH exceeding 20 per cent of their former value. The remaining 86 windows (80 per cent) would still continue to enjoy sunlight in line with the BRE guidelines.

Conclusions on sunlight

134. As with daylight, there are a number of windows which would not meet the BRE guidelines for summer and winter sunlight. In some cases, this is because of existing marginalised levels of sunlight. However, the extent of non compliance is considered minor overall, owing to creation of gaps between the proposed buildings and the

highly urbanised central London location.

Overlooking

135. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. These distances are all met in terms of the impact of the proposal on adjacent buildings

Noise and vibration

136. The noise and vibration impacts from the site would be highest during the demolition of the existing buildings and substructure works, including excavation and piling and lowest during the internal fit out and landscaping. Traffic noise from construction would increase noise levels, particularly along Sumner Street and Emerson Street. These impacts would be temporary, short term and most apparent within 10 metres of the application site. These impacts could be mitigated by way of a construction management plan that would act to reduce excessive noise as far as is possible.
137. The predicted change in traffic flow is low and would have a negligible impact on noise levels. The development would result in a significant increase in the number of residents, workers and, as a result of the cultural facility, visitors. The ES has concluded that these noise levels would not be significant to have an impact on any adjacent occupiers or indeed future residents of the development. The site is located in a busy central London environment where some level of noise should be expected.

Air Quality

138. The site lies within an Air Quality Management Area. The main impacts during the construction phase relate to dust however, like noise and vibration, this could be mitigated by the adoption of a Construction Management Plan. Construction traffic is expected to have a minor adverse effect however this would be temporary and short term and during all other phases this impact would be negligible. Pollution dispersion modelling has taken place and during the operational phase of the development it has been demonstrated that there would be no significant adverse impact on air quality as a result of road traffic and heating plant emissions.

Lighting

139. Details of any external lighting would be required by way of a planning condition to ensure that any of the surrounding residential properties, especially those located to the south of the site at Sumner Buildings do not experience any significant light pollution.

Wind

140. Microclimate has been considered as part of the ES the assessment considers the impact of the development on the wind conditions both on the site and surrounding the site. The demolition and construction works would not be expected to have a significant effect on wind conditions within or surrounding the site. During construction and upon completion the impact has been assessed as ranging from negligible to minor beneficial. Consequently no mitigation is required in this respect.

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

141. It is not anticipated that there will be any conflict of use that would have any adverse impact on occupiers of the proposed dwellings or operators of the retail, office and cultural spaces.

Transport issues

142. 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

143. The site has the highest level of public transport accessibility with a PTAL level of 6b, rated on a scale of 1 to 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, Waterloo and London Bridge stations are all relatively close by around 20 minutes walk. The site is well connected to the London bus network, cycle routes and walking routes. The applicant has agreed to finance some bus shelter improvements in the area and negotiations are on-going with TfL regarding a potential contribution towards improvements at Bankside Pier.

Site Layout

144. The proposed site layout would improve pedestrian routes in the area, in particular providing a new east-west route through the site linking Emerson Street with Park Street at the new Tate Park improving legibility and pedestrian flow.

Servicing

145. The office block and retail units will be serviced from the loading bay accessed from Park Street. The remaining servicing is proposed to take place from Emerson Place and could effectively continue until 22:00 under the applicants proposed servicing arrangement. Emerson Place is a new pedestrian route through the site and is a positive aspect of the scheme. The proposal to service the residential units and the ground floor of Blocks 2 and 3 from Emerson Place is unacceptable both in terms of the proposed hours and the use of this route by vehicles. It is considered acceptable to deal with this issue by condition. As such a detailed Service Management Plan will be required prior to the commencement of the development in order to ensure that all servicing arrangements are suitable, designed out in full and minimise any impact on the surrounding highway network and proposed public realm.

Car parking

146. Saved Policy 5.6 (Car Parking) of the Southwark Plan and Core Strategy Policy 2 (Sustainable Transport) state that residential developments should ideally be car free. For office use, a maximum of one space per 1500sq.m is permitted. No parking (except disabled provision) is expected for retail or culture uses. In this instance the office building will have one parking space within basement level 2. This will be an

accessible parking space. This is well below the maximum parking level and is acceptable

- 147.. Parking for the residential element is proposed at 0.28 spaces per unit, or 28 per cent provision, equating to a total of 45 spaces, all provided at basement level 2. This includes provision of 17 accessible residential bays and 28 general needs residential bays. This is clearly well in excess of current policy which expects residential developments within the Central Activities Zone to be 'Car Free'.
148. During the course of the application, a reduction in car parking was requested by officers and the GLA. The applicants have argued that for developments of this nature, occupants of the residential units do not regularly use their cars at peak hours and request parking spaces for occasional use. It is also submitted that non-provision of car parking spaces will impact on the viability of the project and the applicant has provided evidence of this within a viability assessment.
149. It is noted that the level of car parking provided in this instance is less than that provided on the recently consented schemes on the Samson and Ludgate site (Ref 12/AP/3940) and on the 1-16 Blackfriars site (Ref 12/AP/1784). These sites also had a PTAL level of 6b and car parking was provided at a rate of 0.4 spaces per unit on both of these sites.
150. The level of office car parking is well below the maximum parking range whilst the residential parking exceeds the policy aspiration to provide car free residential developments in the CAZ. The level of car parking is still lower than permitted on other nearby schemes and is considered acceptable on balance given the wider public realm benefits of the proposed development as well as the cultural and employment space being provided. The rights of residents or any members of staff to apply for CPZ permits should be removed however in order to alleviate any pressure on on-street parking. A car park management plan will also be required as part of the Legal Agreement.

Cycling

151. The site is well served by designated cycle routes, Blackfriars Road and Southwark Street are part of the National Cycle Network and connects to Westminster Bridge to the west with the north-south Cycle Super Highway on Southwark Bridge Road to the east. A further Cycle Super Highway is under construction on Blackfriars Road. The existing cycle lane on Park Street will not be affected by the proposed development.
152. A total of 428 cycle parking spaces will be provided, split between the various land uses on site as detailed in the table below:

Land use	Basement cycle parking	Street cycle parking
Residential	262	17
Office	98	11
A1/A3/A4	5	15
Cultural Facility	1	15
Cultural Facility Office	4	0
Total	370	58

153. Access to the Block 1 cycle parking will be via the service lift adjacent to the northern service yard whilst Blocks 2 and 3 cycle parking will be accessed via the car lifts on Emerson Street. The cycle parking numbers are considered acceptable and comply with the updated FALP standards. Furthermore, the majority of basement cycle parking is in the form of Sheffield Stands, this is welcomed. The applicants are also

providing a financial contribution towards the cycle Quietway, this will be included in the Legal Agreement.

154. The transport team have raised concerns regarding the location of the on-street cycle parking bays and the impact they will have on the improved public realm and pedestrian movements and as such it is considered appropriate to apply a condition to secure the details of all cycle parking in order to ensure that a suitable location can be found to the satisfaction of all parties.

Cycle docking station

155. The initial submission included a cycle hire docking station however agreement on the potential location of the docking station could not be agreed. As such the applicant has committed to funding a £200,000 cycle hire docking station with details to be agreed with TfL and the Council. This has been agreed with TfL and would be included in the S106 Legal Agreement.

Car club

156. The applicant has committed to providing a car club bay. At the time of report writing the exact location of the car club bay has not been finalised. Two options have been put forward:

- Option 1 - The existing permit holder bay on Emerson Street immediately to the north of the existing Car Club bay is converted to provide a second Car Club bay. The permit holder bay (C1) is relocated to Sumner Street east.
- Option 2 - The existing parking provision on Emerson Street is retained as is (apart from the relocation of the northern bays to the eastern side of the road) which includes the current Car Club bay at the southern end of Emerson Street. A new Car Club bay would be provided on Sumner Street in the location of the existing single yellow line at the eastern end of Sumner Street.

157. Option 2 is considered to be the most appropriate solution and the relevant plan detailing this new car club parking bay will be included in the S106 Agreement as part of the S.278 works. The obligation will be to provide three years free membership to every eligible resident.

Waste storage and management

158. The proposed waste storage for all elements of the development are considered acceptable both in terms of volume and location. All refuse stores are located within the basement level 2. It is noted that the retail refuse storage for the retail units in Blocks 2 and 3 is located in the section of basement under Block 1. It would be more convenient for these retail units to have their refuse storage located within the main basement area under Blocks 2 and 3. As such a condition will be imposed to agree details of both domestic and commercial refuse storage in order to ensure that all refuse storage is appropriately located and to clarify the split between refuse and recycling receptacles.

159. All waste will be brought to street level via the car lifts on collection days and this will be secured in a Service Management Plan condition and an Estate Management Plan as part of the S106 Agreement.

Construction traffic

160. Construction is estimated to take four years with completion anticipated to be in 2019.

A full Construction Logistics and Environmental Management Plan should be secured in the Legal Agreement. This should specifically require measures to mitigate the increased risk to pedestrians and cyclists arising from construction vehicle operation, through provision of equipment on vehicles, driver training, licence checks, etc. following best practice established by the CrossRail project. A construction Logistics Plan will also be required by condition and will secure full details of anticipated vehicle movements, type of vehicles used, proposed routes and details of construction material storage and plant storage.

Way finding schemes

161. The applicant has committed to the Legible London scheme and will provide £20,000 towards three signs within the immediate vicinity of the site and £15,000 towards additional signs within 15 minutes of the site.

Travel plans

162. The travel plans are largely acceptable subject to referencing the Better Bankside Travel Planning Group, which operates in the area (<http://www.betterbankside.co.uk/travel>). The group offers a transport forum and initiatives for local businesses and residents, and the travel plans should link with this forum. The plan should also detail how the parking spaces can be re-allocated should take-up be low – e.g. extra car club spaces, motorcycle or cycle parking, etc. There should also be commitments to monitoring, such as undertaking reviews at relevant periods. The travel plan monitoring should be secured by the legal agreement.

Conclusion on transport

163. The layout of the site is considered acceptable, with the main vehicle service entrance point located on Park Street at the northern site boundary. The provision of the new east-west pedestrian route through the site is also welcomed. It is noted that the demolition and construction phases are likely to have minor adverse impacts of local significance as detailed in the ES however these will be short term and temporary and will be mitigated by Construction Logistics and Environmental Management Plans.
164. The proposal to provide such a high level of car parking is contrary to policy however it is accepted that this level of car-parking would not cause the degree of harm to warrant refusal of the application given the wider public realm and employment benefits of the proposal. The level of parking is also lower than that consented on similarly accessible sites. The rights of residents or any members of staff to apply for CPZ permits would be removed in order to alleviate any pressure on-street parking. A car park management plan will also be required through the Legal Agreement.
165. The proposal includes a high quantum of cycle parking spaces for residents, staff and visitors. The proposal includes a new crossing point across Park Street, and a significant contribution to the Sumner Street/Bankside Urban Forest public realm improvements. A contribution will be made towards the implementation of a new cycle hire docking station and further contributions have been agreed towards wayfinding (£35,000) new bus shelters (£34,000) and the Quietway (£15,000). Car club membership, car club parking bay, electric vehicle charging points and new crossings will also be secured in the S106 Legal Agreement.

Design

Site layout

166. This development would fundamentally remodel and improve the layout of the site by

introducing three new buildings (Block 1 office and Blocks 2 and 3 residential) in a staggered arrangement that would open up this island site and create a new public route through to Park Street and the new Tate Park from Emerson Street. The tripartite arrangement sits well on the site and gives each building an appropriate setting. On Park Street the commercial building responds to the urban character of this street and brings much-needed activity to its edges. The square plan form of the two residential towers help define the two distinct areas of public open space as well as leaving the rest of the site open to public use. These simple forms reinforce the Emerson Street and Sumner Street frontages and allow space to flow into and around the site. In layout terms the location of the buildings is rational and will improve legibility and pedestrian flow as a result of the new route through the site and the much improved public realm that will compliment the Tate Park.

Tall buildings

167. All three proposed buildings would exceed 30 meters in height and would be considered tall buildings although it is acknowledged that the most prominent elements would be the two residential towers at 15 and 19 storeys. Saved Policy 3.20 requires that any tall building should:
- i. Make a positive contribution to the landscape; and
 - ii. Be located at a point of landmark significance; and
 - iii. Be of the highest architectural standard; and
 - iv. Relate well to its surroundings, particularly at street level; and
 - v. Contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
168. This policy seeks to ensure that a balance is struck between the height of the buildings and the benefits to the local and wider area as a result of high quality design and public realm.

Landscape and public realm

169. The landscaped space proposed for this site is made up of two parts. One part faces west and is located at the heart of the site, and the other faces south onto Sumner Street. These two spaces are separated by a pavilion that links the residential towers and establishes a hierarchy of landscaped spaces. The main public space lies centrally between Block 2/3 and Block 1 and is planned as a busy public space at the centre of the site from which all the different parts of the development can be accessed. This space would include a piazza with mature planting, a water feature and a garden amphitheatre at the foot of the tallest tower (Block 3). This high quality space would compliment the new Tate Park and contribute to the improved permeability across the site, becoming one of a sequence of spaces leading from Tate Park to Emerson Street.
170. The second open space lies to the south of Blocks 2/3 and would take the form of a more tranquil landscaped space, residential in character and characterised by mature planting. Whilst it would form the residents' communal amenity space it would also be accessible to the public from the street and would include a small sculpture pavilion. This public space would make a positive contribution to the character of Sumner Street and would significantly improve the pedestrian experience at street level.
171. The proposed site layout, landscaped spaces and new route through the site work together to enhance the character of the area. They offer the potential for a much improved public realm across the site and would compliment existing public spaces to enhance the immediate area.

Location

172. Tall buildings are required to be located at a point of landmark significance which is defined in the Southwark Plan as “*where a number of important routes converge, where there is a concentration of activity and which is or will be the focus of views from several directions.*” The application site is a point of landmark significance where Park Street, Great Guildford Street and Sumner Street converge at the main southern approach to Tate Modern, itself the primary landmark. The height of the residential towers is considered to have the potential to improve legibility of the area and guide the general public to the Tate.

Architectural design

173. The architectural composition is made of three parts and the architects have described the commercial building (Block 1), the lower residential tower (Block 2) and the taller (Block 3) as a family of buildings characterised by the same materials regardless of their function and characterised by the sculptural undulating forms of their floors, balconies and terraces.
174. The fabric is proposed to be sculptural cast concrete balconies contrasted with deeply ridged metallic cladding and full-height windows. This composition is used both on the commercial block and the two residential towers successfully. On the residential towers the undulating balconies break the simple square plan of the buildings giving a fluid and sculptural quality. The residential towers have a well articulated base, middle and top. At the base, the form of the balconies becomes an expressive generous canopy which would be landscaped to soften its edges and reinforce the tower’s public face. The tops of the towers are highly articulated with the top three storeys terracing back in a sculpted form to give the towers a recessive silhouette. In terms of architectural design the proposal is considered to offer an exceptional and original design concept that will add visual interest and transform the existing site from a barrier at street level to a destination and vibrant thoroughfare.

Street scene

175. The nature of the proposed street-scene is an important measure of the quality of any design. In this case, the limited footprint of the scheme means that the base of each building has to accommodate all its public-facing functions as well as its servicing requirements. The office (Block 1) reinforces the Park Street edge and the building line allows for tree planting at key locations where they are likely to act as landmarks and encourage permeability. All its edges are activated with the main entrance being at the prominent south-west corner onto the square with servicing is limited to a small portion of Park Street.
176. The residential towers have been designed to maximise their active frontages. Block 2 includes the main service entrance from Emerson Street, a retail frontage on the main square and a residential common room facing onto the residents garden. Block 3, the tallest of the three buildings, is encircled by public uses and accommodates the main entrance to the cultural space in the basement, retail uses onto Tate Park and a reception office on Sumner Street. This is the most prominent marker of the group and it is positive that it is active on all frontages. The residential towers and associated public realm work in synch with the Tate extension to provide the eastern bookend to the Tate Park and helping to frame this important public open space.
177. The proposal relates well to its surroundings with the office block forming a relationship with the larger office block to the north of Park Street whilst the residential towers located to the south of the site consolidate the residential nature of Sumner

Street. The public realm, open spaces and active frontages greatly improve the visitor experience at street level where this proposal is considered to be particularly successful.

Contribution to the London skyline – Strategic Views

178. The scheme has been tested in the local and wider views as well as the strategic views as set out in the London View Management Framework (2012). These accurate visual representations comply with the requirements of the LVMF and demonstrate the impact of this proposal on the London skyline.
179. Block 1 does not have any impact on the London skyline or any strategic or local views. Blocks 2 and 3 do have an impact on three important views, the view of St Paul's Cathedral from Alexandra Palace (particularly in the context of Block 3 and the western towers of St Paul's), the view of St Paul's Cathedral from Camberwell Green and the view of the Tate chimney from Sumner Street and the local area.

LVMF View 1A.1 - St Paul's Cathedral from Alexandra Palace

180. The tallest element of the proposal, Block 3, appears in the protected backdrop of this strategic view. Block 3 has been reduced in height from 21 to 19 storeys since the initial submission and first round of consultations. The views demonstrate that proposal is clearly visible near St Paul's Cathedral in this view within the Background Consultation area. This incursion is limited and its impact is primarily on the Western Towers and not the dome itself. Added to this, the terraced design of the top also means that the building is angled away from the strategically important landmark. In this case an assessment must be made as to the ability of the viewer to 'recognise and appreciate' the strategic landmark. The limited nature of the incursion, the significant distance between the viewer and the Strategic Landmark, and the fact that it is located well away from the dome, has been taken into consideration and it is unlikely to harm the viewer's ability to recognise and appreciate the strategic landmark of St Paul's from this view.
181. Historic England have raised significant concerns over the impact of the development on this view and have directed refusal unless the scheme is amended further to address their concern. However, at this stage the GLA have not followed the direction of the national authority on the heritage. St Paul's Cathedral have also raised serious concerns about the impact on this view, and the conclusions made in the applicants Environmental Statement, and have requested that revisions be made, or the application refused. At the heart of this is the LVMF SPG's assertion that Strategically Important Landmarks should have an appropriate setting and proposals should avoid the 'canyon effect' both in the foreground and the background. The reduction in height of Block 3 and the sculptural form of the top of the building allows the western towers of St Paul's Cathedral to be clearly defined in this view. Block 3 on the other hand is more difficult to make out due to the dense band of trees in the view and the surrounding tall buildings. Officers are satisfied that the proposal avoids a canyon effect and that the setting of St Paul's in the view from Alexandra Palace remains unharmed.
182. The TVIA submitted as part of the ES asserts that the proposed development will have a minor beneficial impact on the view of St Paul's Cathedral from Alexandra Palace. Officers would not agree with this conclusion and consider that the impact would be negligible as opposed to beneficial.

Local Views

St Paul's Cathedral from Camberwell Green/Camberwell Road

183. The view of St Paul's Cathedral from Camberwell Green/Road is a remarkable and important local view that is mentioned in the Camberwell Green Conservation Area Appraisal. This view was also noted in the council's recently published Elephant & Castle SPD and helped to shape development of the Heygate Masterplan to ensure that this view was preserved. The initial submission demonstrated that Block 3 would have a substantial incursion into the view of the dome. Following negotiation with officers, Block 3 was reduced by two storeys. The updated views submitted based on the reduced height of Block 3 demonstrate that the view of the dome itself will be preserved albeit with an incursion into the view of the peristyle. The main body of the dome will remain unharmed and the peristyle will still be visible to the east. Although the proposal has not been completely removed from this view, the level of incursion is now minor enough to ensure that one's appreciation of the dome from this viewpoint is largely preserved. Again, the TVIA submitted as part of the ES classifies this impact as being minor beneficial. Officers would not agree with this conclusion and would consider the impact to be negligible to minor adverse. On balance, the impact is considered to be acceptable.

Tate chimney

184. The views submitted with the application demonstrate that the current view of the Tate chimney from Sumner street is lost as a consequence of this design. Whilst this is unfortunate, it is not considered to be detrimental, especially when it is balanced against the significant improvements provided to Sumner Street and the wider benefits of this proposal.

Southbank from Millennium Bridge

185. The residential towers would be visible to the left of the Tate Modern when crossing the Millennium Bridge from north to south. The Tate Modern then becomes framed in the view by the proposed residential towers and the Tate extension, with the Tate chimney located centrally and unaffected by the development. This view is also noteworthy for the role that the residential towers play in townscape terms by forming the eastern edge of the 'step down' in height from the cluster of tall buildings at Blackfriars Road.

St Paul's Cathedral from Great Guildford Street

186. One of the main factors in the design of the proposed development was the opportunity to retain and enhance the view of St Paul's Cathedral from Great Guildford Street. The view of the dome can be appreciated when approaching the site northwards on Great Guildford Street and is perfectly framed by the Tate Modern and the HSBC building on Park Street. In the previous appeal decision the Planning Inspector noted that this view had an important role to play in establishing a local sense of place and refused the previous application based on the loss of this view. The fact that This is a beneficial outcome of the design and site arrangement.

Impact on heritage assets

187. Due to the tightly knit urban grain of the surrounding area the proposed development is not considered to have any demonstrable impact on any of the surrounding heritage assets such as the Grade II listed Union Works, post at the west corner of Bear Gardens or the post at the west corner with Rose Alley. Likewise there will be no

adverse impact on the nearest conservation areas at Thrale Street or Bear Gardens.

Design Review Panel

188. The scheme was reviewed by the Southwark DRP in March 2014. The panel broadly welcomed the proposal to redevelop this important site and felt it presented a fantastic opportunity to compliment the cultural quarter around the Tate and Bankside. They reviewed an earlier version of the design which included a pavilion in the Sumner Street space – where the current proposal is for a resident's garden. At the time they questioned the character and scale of built form and how this was proposed to be balanced by public realm. In conclusion, they welcomed the proposed cultural offer on the site but felt more needed to be done to justify the proposed height and density in relation to the context of the local streets.
189. The applicants have subsequently amended the design to remove the large glazed pavilion and provide the entrance to the cultural facility from within the base of Block 3. This allows a more generous and open public realm on Sumner Street and provides increased focus to the central open space within the site where the frontages of all of the main functions and activity will be located. A more significant revision was the removal of the top two storeys from Block 3 to reduce the height and preserve the view of St Paul's Cathedral from Camberwell Green.

Archaeology

190. The site is located within the Borough, Bermondsey and Rivers Archaeological priority zone, but it is to the south of Park Street, the main east-west route that is included on historic maps since the 16th century. Whilst there are nationally significant archaeological sites to the south of Park Street the applications site sites outside the area of major activity. Previous archaeological material was recorded prior to the construction of the existing building in 1964. The archaeological advisor to the applicant provided a tour of the existing building in an effort to identify a suitable location for an evaluation trench, however, this was not possible due to the continued use of the building and the exceptionally low headroom within the underground car park and as such a borehole was completed instead which revealed a sequence of alluvial deposits over gravels to a considerable depth. A different pattern of underlying geologies may well be identified in other parts of the site.
191. In line with the findings of the ES it is recommended that any site investigation works undertaken are archaeologically monitored. The demolition of the building should be to slab level only and an appropriate archaeological evaluation undertaken. As part of the evaluation works it may well be necessary to undertake a programme of further geoarchaeological assessment in the form of samples take with boreholes or monolith tins. The presence of prehistoric flint work may well indicate that there is a raised eyot within the site. Conditions have been recommended for a programme of archaeological evaluation works and subsequent mitigation works. A further condition to secure the receipt of a timely report has also been included should consent be granted.

Impact on trees

192. A tree survey was undertaken on 27 February 2014 which identified 11 trees within or immediately adjacent to the site including London Plane Trees, Maple, Hornbeam and Liquid Amber. None of these trees are protected by Tree Preservation Order. Five trees were graded as Category B (moderate quality and value). The remaining trees have been graded as Category C owing to their lower quality and value. Nine of the trees will be retained however two will require removal in order to enable development as they sit within the footprint of Block 3. The two trees that would need to be removed

are T11 - London Plane Cat B and T10 - London Plane Cat C.

193. Whilst these two trees would need to be removed, their quality is such that they would not be afforded any formal protection. Furthermore the applicant is proposing a comprehensive landscaping scheme that would include the planting of an additional six trees to ensure that there would be no net loss on site. This includes three Liquid Amber and three Acer. An additional benefit is the retention of the impressive Maple Tree at the entrance to the current building. This tree will be located centrally within the new public realm and will form the centrepiece to this open space. The Urban Forester has considered this proposal and is of the view that this is a suitable response to the site as the highest quality trees are being retained and a suitable re-planting scheme has been proposed. Further details and specifications are required by condition to secure a landscaping scheme of the highest quality on this important site and the retained trees on Sumner Street require protection. The loss of two trees is considered acceptable given the significant public realm improvements that will be delivered as part of this high quality development.

Flood Risk

194. 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. The site is protected by the Thames Barrier and related defences. A flood risk assessment has been submitted with the application and the associated breach analysis demonstrates that the site would not flood in the event of a breach of the Thames tidal defences. The Environment Agency was consulted on the application and they have advised that they would have no objection to the proposal subject to the submission of an addendum to ensure that the 'more vulnerable' use in the basement has been fully considered and mitigated. The applicant has submitted the required information to the Environment Agency who confirmed that they have no objection to the proposal subject to conditions.

Planning obligations (S.106 undertaking or agreement)

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

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

196. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. The Infrastructure Tariff identified in the Aylesbury Area Action Plan, is also replaced by SCIL and the where appropriate the remaining S106. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

S106 obligations

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

Planning Obligation	Mitigation	Applicant Position
Employment During Construction	<p>78 Jobs lasting a minimum of 26 weeks for an unemployed Southwark resident.</p> <p>78 residents trained in pre/post employment short courses.</p> <p>20 new apprenticeships.</p> <p>Or a payment of £377,100.</p>	Agreed
Employment in the Development	<p>81 Southwark business jobs lasting a minimum of 26 weeks.</p> <p>9 Southwark retails jobs lasting a minimum of 26 weeks.</p> <p>Or a payment of £387,000.</p>	Agreed
Child Play Equipment	<p>Delivery on site of new open spaces including play facilities. An additional contribution of £16,610 towards play for older children is required due to the shortfall in play space for this age group</p>	Agreed
Transport Site Specific	<p>A new raised table crossing is required between Park Street and the new Tate Park as well as an informal diagonal crossing between Park Street and Emerson Street. These can either be provided by the applicant as part of the S.278 works or there will be a fall back financial contribution. A contribution of £15,000 is also sought towards the Quietway.</p>	Agreed
Transport for London	<p>Cycle hire docking station - £200,000</p> <p>Wayfinding -£35,000</p> <p>New bus shelters -£34,000</p> <p>Bankside Pier</p>	Agreed with Bankside Pier contribution TBC.
Public Realm	<p>The developer will be providing an improved public realm as part of the development.</p> <p>£250,000 contribution to the Bankside Urban</p>	Agreed

	Forest/Sumner Street improvements.	
Archaeology	£11,171	Agreed
Cycle Hire	Cycle hire docking station - £200,000.	Agreed
Car Club	Provision of a car club bay on Emerson Street and three years membership for every eligible resident.	Agreed
Trees	Not specifically required unless highways issues prevent some of the proposed trees from being planted in which case a contribution will be sought - £3,000 per tree.	Agreed
Community Facilities	The developer is providing a new community space on site.	Agreed
Admin Charge (2%)	£5,632.20	Agreed

S106 Provisions

198. The S106 Agreement will also secure the off-site affordable housing, in lieu payment and relevant cascade system as well as the standard of fit out and marketing period for the wheelchair accessible homes and an Estate Management Plan, Construction and Environmental Management Plan, Parking Management Plan and Service Management Plan. The contributions and in lieu works detailed in the table above will also be secured under the S106 Agreement alongside any S.278 Highways works and amendments to the traffic management order. The Parking Management Plan will be included as an obligation within the S106 and will need to be formally approved by the council. The legal agreement will also secure the delivery of the office accommodation and a Cultural Strategy to manage the occupation of the cultural facility. The contributions of the S106 agreement will be paid on implementation.
199. In the event that an agreement has not been completed by 31 October 2015, the Committee is asked to authorise the Director of Planning to refuse permission, if appropriate, for the following reason:

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

Community Infrastructure Levy (CIL)

200. S143 of the Localism Act 2011 states that any financial sum that an authority has received, will, or could receive in the payment of CIL is a material “local financial consideration” in planning decisions. The requirement for Mayoral and Southwark CIL is a material consideration. However, the weight to be attached to a local finance consideration remains a matter for the decision-maker.

201. Mayoral CIL is to be used for strategic transport improvements in London, primarily Crossrail. The levy is applied to all developments at a rate of £35 (plus indexation) per square metre in Southwark. Southwark CIL in this location has a residential rate of £400 per square metre, £125 for retail, £70 for office and zero for other proposed uses. SCIL is to be used for infrastructure that supports growth with a Southwark commitment to spend at least 25% locally.
202. The following rationale has been used to calculate the floorspace of the proposed development in terms of CIL calculations:
- Existing floor space of 13,940sq.m of which 10,785sq.m is office and 3,155sq.m is other.
 - Proposed floor space of 36,014sq.m of which 10,268sq.m is office (28.5 per cent), 23,081sq.m of residential (64.1 per cent), 954sq.m of retail (2.7 per cent) and 1711sq.m of cultural space (4.8 per cent).
 - And that the existing floor space has been used for 6 months in the last 36 months.
203. Using the calculations above, the proposed development generates a Mayoral CIL payment of £883,404.48 based on a 22,074sq.m increase in total floor space at £40.02 (indexed £35 per sq.m).
204. Likewise the development generates a Southwark CIL payment of £6,304,333.30 based on:
- $22,074\text{sq.m} \times 0.285$ (proportion of increased floor space as office) = 6,291.09sq.m x £70sq.m = £440,376.30
 - $22,074\text{sq.m} \times 0.641$ (proportion of increased floor space as residential) = 14,149.43sq.m x £400sq.m = £5,659,772
 - $22,074\text{sq.m} \times 0.027$ (proportion of increased floor space as retail) = 596sq.m x £125sq.m = £74,500
 - $22,074\text{sq.m} \times 0.047$ (proportion of increased floor space as cultural/retail) = 1,037.48sq.m x £125sq.m = £129,685.

Sustainable development implications

205. 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 per cent through the use of on-site renewable energy generation wherever feasible. In addition, the London Plan expects developments to achieve a reduction in carbon dioxide emissions of 35 per cent over Part L of the 2013 Building Regulations.
206. The proposed development will incorporate a site wide CHP served by a single energy centre that will be located within the south west corner of basement level 2. The CHP scheme has been designed to allow connectivity to any future district heating scheme. Renewable energy is being incorporated in the form of Photovoltaic panels on Block 3 as Blocks 2 and 1 are considered unfeasible due to the level of overshadowing they will experience. The 60sq.m array would generate a 1.1 per cent reduction in CO2 emissions and whilst this falls short of the 20 per cent policy target the development would achieve an overall saving of 35.4 per cent over the 2013 Building Regulations when both the CHP and PV panels are taken together. This is policy compliant.

Other issues

Socio Economics

207. During the demolition and construction phase of the project, the development is expected to support 130 full time equivalent jobs whilst the completed development will support increased job generation by virtue of the quantum and mix of land uses being proposed. The impact of the development on local services such as education, health care and open space is considered to be satisfactorily mitigated by both the development (in terms of provision of open space) and through Southwark CIL.

Ground conditions and contamination

208. The ES has concluded that there would be a negligible impact. Further mitigation is provided in the form of planning conditions that will be attached to any consent issued.

Conclusion on planning issues

209. The redevelopment of the site for mixed use is supported and welcomed. The range of employment uses ensures that there will be only a marginal loss of employment floorspace in line with saved policy 1.4 of The Southwark Plan. The new high quality office floorspace is a major benefit of the scheme and would be capable of attracting new employers to Southwark and secure up to around 700 new jobs.
210. The retail use is considered appropriate in this location and activates the key frontages, and the proposed cultural facility would provide a high quality visitor space that would compliment the existing cultural offer in this area.
211. The principle 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.
212. The principle of providing off-site affordable housing with the balance made up by a payment in lieu is acceptable in the specific circumstances of this case, and is considered to be the mechanism capable of providing the maximum quantum of affordable housing, and would meet a priority need for 'Extra Care' housing. It is reasonable to receive the 'balancing' sum by way of an in lieu payment to assist in the delivery of Council homes through the Direct Delivery programme.
213. The proposed mix of uses will add to the vibrancy of the area which is further improved by the high quality public realm and the new east west route of Emerson Place that will link Emerson Street with the new Tate Park improving both legibility and connectivity in the area. The proposal would transform this island site with extensive improvements in the streetscape together with new active frontages which would improve the experience for pedestrians, and provide for natural surveillance.
214. The buildings are considered to be of an exceptional design that would make a positive contribution to the local townscape. The enhancement of the view of St Paul's from Great Guildford Street is a positive aspect of the scheme. The impact on the strategic view of St Pauls from Alexandra Palace has been carefully considered, and the objections from Historic England and St Paul's Cathedral have been noted. The view of the GLA, expressed in their 'Stage 1 report', has also been noted. Whilst officers do not accept the view in the ES that the impact on this view is beneficial, it is considered that the impact of the incursion is limited, and is unlikely to harm the viewer ability to recognise and appreciate the St Pauls landmark. The reduction of Block B by two storeys has reduced the impact on the view of St Paul's from Camberwell Road and the main body of the dome now preserved in this view.

215. The loss of the two trees to facilitate the improved layout, neither of which are protected, is considered acceptable on account of the high quality public realm and re-planting scheme that is proposed.
216. The impacts of the scheme in relation to daylight and sunlight, particularly with regards to the existing flatted dwellings at Sumner House, are on balance considered acceptable, and whilst there would be departures from the BRE guidelines, other factors such as the gaps created through the buildings, views of open spaces, high quality public realm, and the location of the site within a central London Opportunity Area should be given weight.
217. The submitted Environmental Statement does not raise any impacts which, following mitigation, would warrant withholding planning permission.
218. It is therefore recommended that detailed planning 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, and referral to the GLA.

Community impact statement

219. 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) No issues relevant to particular communities/groups likely to be affected by the proposal have been identified.
220. In line with best practice the applicant has submitted a Statement of Community Involvement detailing the consultation process they have adopted from pre-application stage to submission.
221. A range of communication methods were utilised in order to provide information and get feedback including:
- holding a series of 1-to-1 meetings with key stakeholders to explain the proposals and obtain feedback;
 - giving presentations at public meetings arranged by local amenity groups to explain the proposals and gain the feedback of the local community; and
 - holding a two day exhibition to give people the opportunity to view the plans and discuss the proposals with the applicant and the project team that was attended by 81 people.

Consultations

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

Consultation replies

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

Summary of consultation responses (including re-consultation)

224. Following neighbour consultation, 20 letter/emails of objection have been received on the following grounds:

- The development will harm the view of St Paul's Cathedral from Alexandra Palace.
- The development will impact the setting of St Paul's, and the ES does not properly represent the scale of the impact.
- The development will impact on the view of St Paul's from Camberwell Green/Road.
- The proposed development includes no on-site affordable housing.
- The Heygate re-development was designed to preserve the view of St Paul's from Camberwell Green, this proposal should be designed to offer the same protection
- The buildings are too high, overbearing and not in keeping with their surroundings.
- The surrounding street network will not be able to cope with the additional transport requirements.
- No provision is made for new facilities (schools, dentists, doctors, public open space) to cope with the additional population.
- The buildings will have an adverse impact on the Tate Modern, The Globe and Bear Gardens Conservation Area due to their height.
- Parking problems will be worsened.
- There is too much commercial use in the area.
- The area needs people to actually live in it rather than empty investment properties.
- The development will detract from the historic and cultural richness of the area.
- The closure of Park Street would be unacceptable.
- Lower buildings will experience overshadowing.
- Crossing Park Street can be dangerous for pedestrians; the development should try and improve this.
- The development will have an adverse impact on wind, creating a wind tunnel effect.
- There will be a significant adverse impact on the daylight and sunlight to Sumner Buildings.
- The proposed flats will not help local housing need.
- Block 3 is close to Sumner buildings and will result in overlooking.
- Car parking is excessive and the development should be car free.
- Car lifts on Emerson Street will result in congestion as there is no place for cars to wait.
- Permeability is reduced as the route through the site from Sumner Street is no longer proposed.
- Commercial use will result in noise and disturbance.
- Insufficient green/open space is provided.
- Loss of trees is unacceptable and replacement trees are too small.
- There has been a lack of community involvement and consultation.

225. One letter/email of support has been received from the Globe Theatre on the basis of the high quality design, improvement of the free-flow of pedestrians, public accessibility and the beneficial inclusion of a large cultural space that may be taken up by the Globe with agreement from the developer.

Summary of responses from local groups

226. 20th Century Society

No comment.

227. Trustees of the Tate Gallery

The Tate are generally supportive of the proposals but there are concerns over the lack of on-site affordable housing. The design and mix of uses is supported but the Tate would like to be consulted on potential occupiers of the ground floor retail units as well as being involved in the discussions on future occupiers of the cultural space should the Globe not go ahead with their intention to take up this space. There are serious concerns regarding the impact of the new buildings on light amenity to neighbouring buildings and the Tate objects on this basis. It is also requested that the Bankside Urban Forest initiative is considered by the applicants and they are encouraged to join the Bankside and London Bridge logistics group to coordinate construction management. Tate would also like to ensure that the Tate extension has been factored into the wind and microclimate modelling that has been undertaken as part of the ES.

Summary of responses from external and statutory consultees

228. Environment Agency

No objection subject to conditions.

229. Greater London Authority

The land use principles are strongly supported. The inability to provide on-site affordable housing needs to be fully demonstrated and the off-site solution fully evidenced. The housing quality, density and play space are all acceptable. The design is high quality and the impact on strategic and local views is considered acceptable. The provision of car parking is high for an accessible site and contributions are sought towards transport and wayfinding improvements in the area. Carbon reductions fall short of London Plan policy and additional measures should be investigated.

230. Historic England

Objection in the basis that the development will have an adverse impact on the view of St Paul's Cathedral from Alexandra Palace. The amended height of the building still exceeds the 52.1m limit set out in the London View Management Framework.

231. St Paul's Cathedral

Object to the impact of the development on this nationally important historic landmark. The buildings encroach on the protected LVMF view of St Paul's from Alexandra Palace. The buildings also adversely impact on the view from the Golden Gallery, and on the wider setting of St Paul's. The ES analysis is not impartial and does not provide evidence for its conclusions. Request that an impartial expert evaluation is sought, that the development be significantly amended, and if not, the application should be refused.

232. Natural England

The application is unlikely to result in significant impacts on statutory designated sites and landscapes.

233. Port of London Authority

No objection but would like to see more robust targets set for river use.

234. Thames Water

No objections with regards to sewerage infrastructure capacity. Conditions should be imposed to secure details of piling, water supply and drainage.

235. Transport for London

Contributions sought towards improvements to Bankside Pier, bus shelter upgrades, signage and cycle hire. The level of car parking is high and a reduction in parking spaces would be welcomed.

236. No response, comments or objections were received from the following:

BAA
London City Airport
London Borough of Lambeth
London Borough of Tower Hamlets
London Borough of Camden
London Borough of Haringey
London Borough of Islington
London Borough of Lewisham
Westminster City Council
London Fire Brigade
London Underground
Network Rail
Royal Borough of Greenwich
Sport England

Human rights implications

237. 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.

238. This application has the legitimate aim of providing an office, retail, cultural and residential mixed use development. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

239. None.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1523-185 Application file: 14/AP/3842 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	Additional Image 1
Appendix 4	Additional Image 2
Appendix 5	Additional Image 3
Appendix 6	Recommendation

AUDIT TRAIL

Lead Officer	Gary Rice, Head of Development Management	
Report Author	Terence McLellan, Team Leader Planning	
Version	Final	
Dated	3 July 2015	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic director, finance & corporate services	Yes	Yes
Strategic director, environment and leisure	Yes	Yes
Strategic director, housing and community services	Yes	No
Director of regeneration	Yes	No
Date final report sent to Constitutional Team	3 July 2015	

Consultation undertaken

Site notice date: 05/11/2014

Press notice date: 21/05/2015

Case officer site visit date: 21/05/2015

Neighbour consultation letters sent: 30/10/2014

Internal services consulted:

Ecology Officer
Economic Development Team
Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]
Flood and Drainage Team
HIGHWAY LICENSING
Highway Development Management
Housing Regeneration Initiatives
Waste Management

Statutory and non-statutory organisations consulted:

Arqiva - digital communications
BAA - Safeguarding
City Of London
City of Westminster
Civil Aviation Authority
Commission for Architecture and the Built Environment
Countryside Commission
Dean and Chapter, Dean and Chapter of Cathedral Church of St Paul's
Dept. for Communities & Local Government [Referrals under T&CP (Consultation)(England) Direction 2009 -for London only- as per Annex B of Chief Planner's letter 10 March 2011 - see details on Xdrive]
EDF Energy
English Heritage
Environment Agency
Greater London Authority
Historic England
London Ambulance Service, HQ Annex Gnd Floor
London Borough of Camden
London Borough of Haringey
London Borough of Islington
London Borough of Lambeth
London Borough of Lewisham
London Borough of Tower Hamlets
London City Airport
London Fire & Emergency Planning Authority
London Underground Limited
Metropolitan Police Service (Designing out Crime)
Natural England - London Region & South East Region
Network Rail (Planning)

Port of London Authority
Royal Borough of Greenwich
Southwark PCT
Sport England
Thames Water - Development Planning
The Royal Parks
Transport for London (referable & non-referable app notifications and pre-apps)
Twentieth Century Society

Neighbour and local groups consulted:

36 Sumner Buildings Sumner Street SE1 9JX	Flat 9 Anchor Terrace SE1 9HQ
35 Sumner Buildings Sumner Street SE1 9JX	Flat 12 Anchor Terrace SE1 9HQ
34 Sumner Buildings Sumner Street SE1 9JX	Flat 15 Anchor Terrace SE1 9HQ
37 Sumner Buildings Sumner Street SE1 9JX	Flat 14 Anchor Terrace SE1 9HQ
4 Sumner Buildings Sumner Street SE1 9JX	Flat 13 Anchor Terrace SE1 9HQ
39 Sumner Buildings Sumner Street SE1 9JX	Flat 24 Anchor Terrace SE1 9HQ
38 Sumner Buildings Sumner Street SE1 9JX	Flat 5 21 Great Guildford Street SE1 9EP
33 Sumner Buildings Sumner Street SE1 9JX	Flat 4 21 Great Guildford Street SE1 9EP
29 Sumner Buildings Sumner Street SE1 9JX	Flat 3 21 Great Guildford Street SE1 9EP
28 Sumner Buildings Sumner Street SE1 9JX	Flat 6 21 Great Guildford Street SE1 9EP
27 Sumner Buildings Sumner Street SE1 9JX	Flat 9 21 Great Guildford Street SE1 9EP
3 Sumner Buildings Sumner Street SE1 9JX	Flat 8 21 Great Guildford Street SE1 9EP
32 Sumner Buildings Sumner Street SE1 9JX	Flat 7 21 Great Guildford Street SE1 9EP
31 Sumner Buildings Sumner Street SE1 9JX	Flat 2 21 Great Guildford Street SE1 9EP
30 Sumner Buildings Sumner Street SE1 9JX	Flat 27 Anchor Terrace SE1 9HQ
40 Sumner Buildings Sumner Street SE1 9JX	Flat 26 Anchor Terrace SE1 9HQ
50 Sumner Buildings Sumner Street SE1 9JX	Flat 25 Anchor Terrace SE1 9HQ
5 Sumner Buildings Sumner Street SE1 9JX	Flat 28 Anchor Terrace SE1 9HQ
49 Sumner Buildings Sumner Street SE1 9JX	Flat 1 21 Great Guildford Street SE1 9EP
6 Sumner Buildings Sumner Street SE1 9JX	56 Park Street London SE1 9AR
9 Sumner Buildings Sumner Street SE1 9JX	Flat 29 Anchor Terrace SE1 9HQ
8 Sumner Buildings Sumner Street SE1 9JX	101 Block B 60 Holland Street SE1 9JF
7 Sumner Buildings Sumner Street SE1 9JX	62 Holland Street London SE1 9JF
48 Sumner Buildings Sumner Street SE1 9JX	102 Block B 60 Holland Street SE1 9JF
43 Sumner Buildings Sumner Street SE1 9JX	201 Block B 60 Holland Street SE1 9JF
42 Sumner Buildings Sumner Street SE1 9JX	105 Block B 60 Holland Street SE1 9JF
41 Sumner Buildings Sumner Street SE1 9JX	103 Block B 60 Holland Street SE1 9JF
44 Sumner Buildings Sumner Street SE1 9JX	1002 Block A 50 Holland Street SE1 9FU
47 Sumner Buildings Sumner Street SE1 9JX	803 Block A 50 Holland Street SE1 9FU
46 Sumner Buildings Sumner Street SE1 9JX	802 Block A 50 Holland Street SE1 9FU
45 Sumner Buildings Sumner Street SE1 9JX	801 Block A 50 Holland Street SE1 9FU
51 Bankside London SE1 9JE	901 Block A 50 Holland Street SE1 9FU
49 Bankside London SE1 9JE	1001 Block A 50 Holland Street SE1 9FU
35 Southwark Bridge Road London SE1 9HH	903 Block A 50 Holland Street SE1 9FU
52 Bankside London SE1 9JE	902 Block A 50 Holland Street SE1 9FU
11 Sumner Buildings Sumner Street SE1 9JX	202 Block B 60 Holland Street SE1 9JF
10 Sumner Buildings Sumner Street SE1 9JX	501 Block B 60 Holland Street SE1 9JF
1 Sumner Buildings Sumner Street SE1 9JX	405 Block B 60 Holland Street SE1 9JF
Block A Flat 14 Peabody Estate SE1 0TW	403 Block B 60 Holland Street SE1 9JF
Block A Flat 13 Peabody Estate SE1 0TW	502 Block B 60 Holland Street SE1 9JF
Block A Flat 12 Peabody Estate SE1 0TW	601 Block B 60 Holland Street SE1 9JF
Union Works Bear Gardens SE1 9EB	505 Block B 60 Holland Street SE1 9JF
12 Sumner Buildings Sumner Street SE1 9JX	503 Block B 60 Holland Street SE1 9JF
22 Sumner Buildings Sumner Street SE1 9JX	402 Block B 60 Holland Street SE1 9JF
21 Sumner Buildings Sumner Street SE1 9JX	301 Block B 60 Holland Street SE1 9JF
20 Sumner Buildings Sumner Street SE1 9JX	205 Block B 60 Holland Street SE1 9JF
23 Sumner Buildings Sumner Street SE1 9JX	203 Block B 60 Holland Street SE1 9JF
26 Sumner Buildings Sumner Street SE1 9JX	302 Block B 60 Holland Street SE1 9JF
25 Sumner Buildings Sumner Street SE1 9JX	401 Block B 60 Holland Street SE1 9JF
24 Sumner Buildings Sumner Street SE1 9JX	305 Block B 60 Holland Street SE1 9JF
2 Sumner Buildings Sumner Street SE1 9JX	303 Block B 60 Holland Street SE1 9JF
15 Sumner Buildings Sumner Street SE1 9JX	101 Block A 50 Holland Street SE1 9FU
14 Sumner Buildings Sumner Street SE1 9JX	402 Block E 118 Southwark Street SE1 0FE
13 Sumner Buildings Sumner Street SE1 9JX	102 Block A 50 Holland Street SE1 9FU
16 Sumner Buildings Sumner Street SE1 9JX	202 Block A 50 Holland Street SE1 9FU
19 Sumner Buildings Sumner Street SE1 9JX	201 Block A 50 Holland Street SE1 9FU
18 Sumner Buildings Sumner Street SE1 9JX	103 Block A 50 Holland Street SE1 9FU
17 Sumner Buildings Sumner Street SE1 9JX	401 Block E 118 Southwark Street SE1 0FE
91 Sumner Buildings Sumner Street SE1 9JY	102 Block E 118 Southwark Street SE1 0FE
90 Sumner Buildings Sumner Street SE1 9JY	101 Block E 118 Southwark Street SE1 0FE
89 Sumner Buildings Sumner Street SE1 9JY	Health And Safety Executive Rose Court SE1 9HF
92 Sumner Buildings Sumner Street SE1 9JY	201 Block E 118 Southwark Street SE1 0FE
95 Sumner Buildings Sumner Street SE1 9JY	302 Block E 118 Southwark Street SE1 0FE
94 Sumner Buildings Sumner Street SE1 9JY	301 Block E 118 Southwark Street SE1 0FE

Block K Flat 2 Peabody Estate SE1 OTN
Block I Flat 10 Peabody Estate SE1 OTL
Block I Flat 5 Peabody Estate SE1 OTL
Block I Flat 4 Peabody Estate SE1 OTL
Block I Flat 3 Peabody Estate SE1 OTL
Block I Flat 6 Peabody Estate SE1 OTL
Block I Flat 9 Peabody Estate SE1 OTL
Block I Flat 8 Peabody Estate SE1 OTL
Block I Flat 7 Peabody Estate SE1 OTL
Block E Flat 13 Peabody Estate SE1 OTG
Block E Flat 12 Peabody Estate SE1 OTG
Block E Flat 11 Peabody Estate SE1 OTG
Block E Flat 14 Peabody Estate SE1 OTG
Block E Flat 17 Peabody Estate SE1 OTG
Block E Flat 16 Peabody Estate SE1 OTG
Block E Flat 15 Peabody Estate SE1 OTG
Block E Flat 10 Peabody Estate SE1 OTG
Block E Flat 5 Peabody Estate SE1 OTG
Block E Flat 4 Peabody Estate SE1 OTG
Block E Flat 3 Peabody Estate SE1 OTG
Block E Flat 6 Peabody Estate SE1 OTG
Block E Flat 9 Peabody Estate SE1 OTG
Block E Flat 8 Peabody Estate SE1 OTG
Block E Flat 7 Peabody Estate SE1 OTG
Block E Flat 18 Peabody Estate SE1 OTG
Block G Flat 12 Peabody Estate SE1 OTH
Block G Flat 11 Peabody Estate SE1 OTH
Block G Flat 10 Peabody Estate SE1 OTH
Block G Flat 13 Peabody Estate SE1 OTH
Block H Flat 3 Peabody Estate SE1 OTJ
Block H Flat 2 Peabody Estate SE1 OTJ
Block G Flat 14 Peabody Estate SE1 OTH
Block G Flat 9 Peabody Estate SE1 OTH
Block G Flat 4 Peabody Estate SE1 OTH
Block G Flat 3 Peabody Estate SE1 OTH
Block G Flat 2 Peabody Estate SE1 OTH
Block G Flat 5 Peabody Estate SE1 OTH
Block G Flat 8 Peabody Estate SE1 OTH
Block G Flat 7 Peabody Estate SE1 OTH
Block G Flat 6 Peabody Estate SE1 OTH
Block C Flat 3 Peabody Estate SE1 OTR
Block C Flat 2 Peabody Estate SE1 OTR
Block F Flat 14 Peabody Estate SE1 OTQ
Block C Flat 4 Peabody Estate SE1 OTR
Block C Flat 7 Peabody Estate SE1 OTR
Block C Flat 6 Peabody Estate SE1 OTR
Block C Flat 5 Peabody Estate SE1 OTR
Block F Flat 13 Peabody Estate SE1 OTQ
Block F Flat 8 Peabody Estate SE1 OTQ
Block F Flat 7 Peabody Estate SE1 OTQ
Block F Flat 6 Peabody Estate SE1 OTQ
Block F Flat 9 Peabody Estate SE1 OTQ
Block F Flat 12 Peabody Estate SE1 OTQ
Block F Flat 11 Peabody Estate SE1 OTQ
Block F Flat 10 Peabody Estate SE1 OTQ
Block C Flat 8 Peabody Estate SE1 OTR
Block A Flat 6 Peabody Estate SE1 OTW
Block A Flat 5 Peabody Estate SE1 OTW
Block A Flat 4 Peabody Estate SE1 OTW
Block A Flat 7 Peabody Estate SE1 OTW
Block A Flat 10 Peabody Estate SE1 OTW
Block A Flat 9 Peabody Estate SE1 OTW
Block A Flat 8 Peabody Estate SE1 OTW
Block A Flat 3 Peabody Estate SE1 OTW
Block C Flat 11 Peabody Estate SE1 OTR
Block C Flat 10 Peabody Estate SE1 OTR
Block C Flat 9 Peabody Estate SE1 OTR
Block C Flat 12 Peabody Estate SE1 OTR
Block A Flat 2 Peabody Estate SE1 OTW
Block C Flat 14 Peabody Estate SE1 OTR
Block C Flat 13 Peabody Estate SE1 OTR
Block K Flat 15 Peabody Estate SE1 OTN
Block K Flat 14 Peabody Estate SE1 OTN
Block K Flat 13 Peabody Estate SE1 OTN
Block K Flat 16 Peabody Estate SE1 OTN
Block B Flat 2 Peabody Estate SE1 OTP
Block K Flat 18 Peabody Estate SE1 OTN
Block K Flat 17 Peabody Estate SE1 OTN
Block K Flat 12 Peabody Estate SE1 OTN
Flat 7 Peabody Buildings SE1 OTL
Empire Warehouse Bear Gardens SE1 9ED
16 Peabody Buildings Southwark Street SE1 OTR
25a Sumner Street London SE1 9JZ
11-17 Great Guildford Street London SE1 0ES
47 Bankside London SE1 9JE
Suite 6 Ground Floor South Building 185 Park Street SE1 9DY
Unit 2 133 Park Street SE1 9EA
Basement 4 Emerson Street SE1 9DU
Suite 5 Part First Floor South Building 185 Park Street SE1 9DY
Basement 6-8 Emerson Street SE1 9DU
Eat Cafe Riverside House SE1 9HA
Second Floor Notcutt House SE1 9EU
First Floor Riverside House SE1 9HA
Unit 3 Riverside House SE1 9HA
The Real Greek Riverside House SE1 9HA
Suite Three Ground Floor South Building 185 Park Street SE1 9DY
Third Floor 32 Southwark Bridge Road SE1 9EU
Ground Floor 32 Southwark Bridge Road SE1 9EU
43-47 Southwark Bridge Road London SE1 9HH
Units 2 To 3 Benbow House SE1 9DS
Tate Modern Sumner Street SE1 9TG
First Floor 32 Southwark Bridge Road SE1 9EU
Unit 4 23a Great Guildford Street SE1 9EP
Unit 3 23 Great Guildford Street SE1 9EZ
Units 1 And 2 19-19a Great Guildford Street SE1 9EZ
First Floor 135 Park Street SE1 9EA
Basement 32 Southwark Bridge Road SE1 9EU
Second Floor 135 Park Street SE1 9EA
Ground Floor 135 Park Street SE1 9EA
Unit 1 Benbow House SE1 9DS
First Floor Notcutt House SE1 9EU
60 Park Street London SE1 9EA
1 Bear Gardens London SE1 9ED
53-61 Southwark Bridge Road London SE1 9HH
18 Great Guildford Street London SE1 0FD
90b Southwark Street London SE1 1RQ
90a Southwark Street London SE1 0SW
20 Great Guildford Street London SE1 0FD
16 Sumner Street London SE1 9JZ
14 Sumner Street London SE1 9JZ
22 Great Guildford Street London SE1 0FD
106 Southwark Street London SE1 0SU
Twelfth Floor Blue Fin Building SE1 0SU
Eleventh Floor South Wing Blue Fin Building SE1 0TA
Third Floor Blue Fin Building SE1 0SU
Blue Fin Building 110 Southwark Street SE1 0SU
Fifth Floor To Eleventh Floor Blue Fin Building SE1 0SU
Fourth Floor Blue Fin Building SE1 0SU
18 Sumner Street London SE1 9JZ
6 Canvey Street London SE1 9AN
4 Canvey Street London SE1 9AN
2 Canvey Street London SE1 9AN
First Floor Blue Fin Building SE1 0SU
Fifth Floor Rose Court SE1 9HF
49 Southwark Bridge Road London SE1 9HH
Part Second Floor Left 4-8 Emerson Street SE1 9DU
12 Sumner Street London SE1 9JZ
3 Canvey Street London SE1 9AN
22 Sumner Street London SE1 9JZ
20 Sumner Street London SE1 9JZ
5 Canvey Street London SE1 9AN
Second Floor East Wing Blue Fin Building SE1 0TA
Second Floor Excluding East Wing Blue Fin Building SE1 0SU
7 Canvey Street London SE1 9AN
Third Floor 4-8 Emerson Street SE1 9DU
Suite Right Second Floor 4-8 Emerson Street SE1 9DU
Ground Floor Left Suite H 4-8 Emerson Street SE1 9DU
North Building Ground Floor 1 185 Park Street SE1 9DY
South Building Ground Floor 2 185 Park Street SE1 9DY
North Building Ground Floor 3 185 Park Street SE1 9DY
North Building Ground Floor 2 185 Park Street SE1 9DY
Second Floor Rear 32 Southwark Bridge Road SE1 9EU
First Floor 76-80 Southwark Street SE1 0PN
Suite Six Part First Floor South Building 185 Park Street SE1 9DY
North Building Second Floor East 185 Park Street SE1 9DY
Second Floor Front 32 Southwark Bridge Road SE1 9EU
North Building Second Floor West 185 Park Street SE1 9DY
Suite Two Ground Floor South Building 185 Park Street SE1 9DY

Block K Flat 7 Peabody Estate SE1 OTN
Block K Flat 6 Peabody Estate SE1 OTN
Block K Flat 5 Peabody Estate SE1 OTN
Block K Flat 8 Peabody Estate SE1 OTN
Block K Flat 11 Peabody Estate SE1 OTN
Block K Flat 10 Peabody Estate SE1 OTN
Block K Flat 9 Peabody Estate SE1 OTN
Block B Flat 3 Peabody Estate SE1 OTP
Block B Flat 14 Peabody Estate SE1 OTP
Block B Flat 13 Peabody Estate SE1 OTP
Block B Flat 12 Peabody Estate SE1 OTP
Block F Flat 2 Peabody Estate SE1 OTQ
Block F Flat 5 Peabody Estate SE1 OTQ
Block F Flat 4 Peabody Estate SE1 OTQ
Block F Flat 3 Peabody Estate SE1 OTQ
Block B Flat 11 Peabody Estate SE1 OTP
Block B Flat 6 Peabody Estate SE1 OTP
Block B Flat 5 Peabody Estate SE1 OTP
Block B Flat 4 Peabody Estate SE1 OTP
Block B Flat 7 Peabody Estate SE1 OTP
Block B Flat 10 Peabody Estate SE1 OTP
Block B Flat 9 Peabody Estate SE1 OTP
Block B Flat 8 Peabody Estate SE1 OTP
Flat E 17 Southwark Bridge Road SE1 9HH
Flat 70 Benbow House SE1 9DS
Flat 69 Benbow House SE1 9DS
Flat 68 Benbow House SE1 9DS
Flat 71 Benbow House SE1 9DS
Flat 74 Benbow House SE1 9DS
Flat 73 Benbow House SE1 9DS
Flat 72 Benbow House SE1 9DS
Flat 67 Benbow House SE1 9DS
Flat 62 Benbow House SE1 9DS
Flat 61 Benbow House SE1 9DS
Flat 60 Benbow House SE1 9DS
Flat 63 Benbow House SE1 9DS
Flat 66 Benbow House SE1 9DS
Flat 65 Benbow House SE1 9DS
Flat 64 Benbow House SE1 9DS
Flat 8 20 New Globe Walk SE1 9DX
Flat 7 20 New Globe Walk SE1 9DX
Flat 6 20 New Globe Walk SE1 9DX
Flat 9 20 New Globe Walk SE1 9DX
Flat 12 20 New Globe Walk SE1 9DX
Flat 11 20 New Globe Walk SE1 9DX
Flat 10 20 New Globe Walk SE1 9DX
Flat 5 20 New Globe Walk SE1 9DX
22 Southwark Bridge Road London SE1 9HB
38-48 Southwark Bridge Road London SE1 9EJ
Flat 1 20 New Globe Walk SE1 9DX
Flat 4 20 New Globe Walk SE1 9DX
Flat 3 20 New Globe Walk SE1 9DX
Flat 2 20 New Globe Walk SE1 9DX
Flat 39 Benbow House SE1 9DS
Flat 38 Benbow House SE1 9DS
Flat 37 Benbow House SE1 9DS

Flat 40 Benbow House SE1 9DS
Flat 43 Benbow House SE1 9DS
Flat 42 Benbow House SE1 9DS

Flat 41 Benbow House SE1 9DS
Flat 36 Benbow House SE1 9DS
Flat 31 Benbow House SE1 9DS
Flat 30 Benbow House SE1 9DS
Flat 29 Benbow House SE1 9DS
Flat 32 Benbow House SE1 9DS
Flat 35 Benbow House SE1 9DS
Flat 34 Benbow House SE1 9DS
Flat 33 Benbow House SE1 9DS
Flat 44 Benbow House SE1 9DS
Flat 55 Benbow House SE1 9DS
Flat 54 Benbow House SE1 9DS
Flat 53 Benbow House SE1 9DS
Flat 56 Benbow House SE1 9DS
Flat 59 Benbow House SE1 9DS
Flat 58 Benbow House SE1 9DS
Flat 57 Benbow House SE1 9DS
Flat 52 Benbow House SE1 9DS

South Building Ground Floor 4 185 Park Street SE1 9DY
Eighth Floor Riverside House SE1 9HA
Arches 1 To 12 54 Park Street SE1 9EA
Arches 13 And 14 54 Park Street SE1 9EA
South Building Fifth Floor 185 Park Street SE1 9DY
South Building Fourth Floor 185 Park Street SE1 9DY
Suite Four Part First Floor South Building 185 Park Street SE1 9DY
Arches 15 And 16 54 Park Street SE1 9EA
Ninth Floor Riverside House SE1 9HA
Ground Floor To Fifth Floor And Eleventh Floor Riverside House SE1 9HA
602 Block C 70 Holland Street SE1 9NX
Basement Unit E South Buliding SE1 9DY
Basement Unit D South Buliding SE1 9DY
Basement Unit C South Buliding SE1 9DY
Basement Unit F South Buliding SE1 9DY
Basement Unit I South Buliding SE1 9DY
Basement Unit H South Buliding SE1 9DY
Basement Unit G South Buliding SE1 9DY
Basement Unit B South Buliding SE1 9DY
First Floor Right 4-8 Emerson Street SE1 9DU
First Floor Left 4-8 Emerson Street SE1 9DU
405 Block A 50 Holland Street SE1 9FU
Basement Unit A South Buliding SE1 9DY
Basement Unit J South Buliding SE1 9DY
Fifth Floor Intel House SE1 9HF
Fourth Floor Intel House SE1 9HF
Sixth Floor Riverside House SE1 9HA
Sixth Floor Intel House SE1 9HF
Basement Unit M South Buliding SE1 9DY
Basement Unit L South Buliding SE1 9DY
Basement Unit K South Buliding SE1 9DY
Basement Unit N South Buliding SE1 9DY
Bankside 2 And 3 90-100 Southwark Street SE1 0SW
Basement Unit O South Buliding SE1 9DY
18 Bear Pit Apartments 14 New Globe Walk SE1 9DR
17 Bear Pit Apartments 14 New Globe Walk SE1 9DR
16 Bear Pit Apartments 14 New Globe Walk SE1 9DR
19 Bear Pit Apartments 14 New Globe Walk SE1 9DR
22 Bear Pit Apartments 14 New Globe Walk SE1 9DR
21 Bear Pit Apartments 14 New Globe Walk SE1 9DR
20 Bear Pit Apartments 14 New Globe Walk SE1 9DR
15 Bear Pit Apartments 14 New Globe Walk SE1 9DR
10 Bear Pit Apartments 14 New Globe Walk SE1 9DR
9 Bear Pit Apartments 14 New Globe Walk SE1 9DR
8 Bear Pit Apartments 14 New Globe Walk SE1 9DR
11 Bear Pit Apartments 14 New Globe Walk SE1 9DR
14 Bear Pit Apartments 14 New Globe Walk SE1 9DR
13 Bear Pit Apartments 14 New Globe Walk SE1 9DR
12 Bear Pit Apartments 14 New Globe Walk SE1 9DR
23 Bear Pit Apartments 14 New Globe Walk SE1 9DR
Unit 11a Blue Fin Building SE1 0SU
Workshop Peabody Buildings SE1 0TW
305 Block A 50 Holland Street SE1 9FU
205 Block A 50 Holland Street SE1 9FU
105 Block A 50 Holland Street SE1 9FU
Lower Ground And Mezzanine And Third Floor And Fourth Floor 36 Southwark Bridge Road SE1 9EU
24 Bear Pit Apartments 14 New Globe Walk SE1 9DR
Seventh Floor Rear Riverside House SE1 9HA
Basement And Ground Floor And Second Floor To Fifth Floor 76-80 Southwark Street SE1 0PN
Unit 15 100 Southwark Street SE1 0SW
Ninth Floor Bankside 3 90-100 Southwark Street SE1 0SW
107 Block D 5 Sumner Street SE1 9RE
Unit A Blue Fin Building SE1 0SU
The Swan Bar And Restaurant Shakespeare Globe Theatre SE1 9DT
Unit 1 Block B SE1 9JF
Unit B Blue Fin Building SE1 0SU
Mezz Riverside House SE1 9HA
1506 Block B 60 Holland Street SE1 9JF
Part Second Floor Excluding East Wing Blue Fin Building SE1 0SU
1105 Block B 60 Holland Street SE1 9JF
Davies House 60a Park Street SE1 9EA
Block F Flat 1 Peabody Estate SE1 OTQ
Block B Flat 1 Peabody Estate SE1 OTP
Block K Flat 1 Peabody Estate SE1 OTN
Block C Flat 1 Peabody Estate SE1 OTR
Block E Flat 2 Peabody Estate SE1 OTG
Block E Flat 1 Peabody Estate SE1 OTG

Flat 47 Benbow House SE1 9DS
Flat 46 Benbow House SE1 9DS
Flat 45 Benbow House SE1 9DS
Flat 48 Benbow House SE1 9DS
Flat 51 Benbow House SE1 9DS
Flat 50 Benbow House SE1 9DS
Flat 49 Benbow House SE1 9DS
Third Floor 34 Southwark Bridge Road SE1 9EU
Second Floor 34 Southwark Bridge Road SE1 9EU
First Floor 34 Southwark Bridge Road SE1 9EU
9 Sumner Street London SE1 9JZ
Store Adjacent 1 Peabody Buildings SE1 0TW
Ground Floor 34 Southwark Bridge Road SE1 9EU
Flat F 37 Southwark Bridge Road SE1 9HH
Flat E 37 Southwark Bridge Road SE1 9HH
Flat D 37 Southwark Bridge Road SE1 9HH
Flat G 37 Southwark Bridge Road SE1 9HH
1 Southwark Bridge Road London SE1 9HL
Fourth Floor 4-8 Emerson Street SE1 9DU
11 Sumner Street London SE1 9JZ
Estate Workshop Sumner Buildings SE1 9JY
Flat 23 20 New Globe Walk SE1 9DX

Flat 22 20 New Globe Walk SE1 9DX
Flat 21 20 New Globe Walk SE1 9DX
Flat 24 20 New Globe Walk SE1 9DX
Flat 27 20 New Globe Walk SE1 9DX
Flat 26 20 New Globe Walk SE1 9DX
Flat 25 20 New Globe Walk SE1 9DX
Flat 20 20 New Globe Walk SE1 9DX
Flat 15 20 New Globe Walk SE1 9DX
Flat 14 20 New Globe Walk SE1 9DX
Flat 13 20 New Globe Walk SE1 9DX
Flat 16 20 New Globe Walk SE1 9DX
Flat 19 20 New Globe Walk SE1 9DX
Flat 18 20 New Globe Walk SE1 9DX
Flat 17 20 New Globe Walk SE1 9DX
Flat 28 20 New Globe Walk SE1 9DX
Flat 818 Bankside House SE1 9JA
Flat 817 Bankside House SE1 9JA
Flat 816 Bankside House SE1 9JA
Flat 16 Benbow House SE1 9DS
Flat C 37 Southwark Bridge Road SE1 9HH
Flat B 37 Southwark Bridge Road SE1 9HH
Flat A 37 Southwark Bridge Road SE1 9HH
Flat 808 Bankside House SE1 9JA
Flat 31 20 New Globe Walk SE1 9DX
Flat 30 20 New Globe Walk SE1 9DX
Flat 29 20 New Globe Walk SE1 9DX
Flat 32 20 New Globe Walk SE1 9DX
Flat 807 Bankside House SE1 9JA
Flat 34 20 New Globe Walk SE1 9DX
Flat 33 20 New Globe Walk SE1 9DX
Flat 28 Benbow House SE1 9DS
Flat 30 Old Theatre Court SE1 9ES
Flat 29 Old Theatre Court SE1 9ES
Flat 28 Old Theatre Court SE1 9ES
Flat 31 Old Theatre Court SE1 9ES
Flat 35 Old Theatre Court SE1 9ES
Flat 33 Old Theatre Court SE1 9ES
Flat 32 Old Theatre Court SE1 9ES
Flat 27 Old Theatre Court SE1 9ES
Flat 21 Old Theatre Court SE1 9ES
Flat 20 Old Theatre Court SE1 9ES
Flat 19 Old Theatre Court SE1 9ES
Flat 22 Old Theatre Court SE1 9ES
Flat 26 Old Theatre Court SE1 9ES
Flat 25 Old Theatre Court SE1 9ES
Flat 23 Old Theatre Court SE1 9ES
Flat 36 Old Theatre Court SE1 9ES
4 Anchor Terrace 125 Park Street SE1 9EW
3 Anchor Terrace 125 Park Street SE1 9EW
2 Anchor Terrace 125 Park Street SE1 9EW
5 Anchor Terrace 125 Park Street SE1 9EW
Flat 8 Anchor Terrace SE1 9HQ
Flat 7 Anchor Terrace SE1 9HQ
15 New Globe Walk London SE1 9DR
1 Anchor Terrace 125 Park Street SE1 9EW
Flat 39 Old Theatre Court SE1 9ES

Block A Flat 1 Peabody Estate SE1 0TW
Block I Flat 1 Peabody Estate SE1 0TL
905 Block D 5 Sumner Street SE1 9RE
607 Block D 5 Sumner Street SE1 9RE
Pepys House 60b Park Street SE1 9EA
906 Block D 5 Sumner Street SE1 9RE
Block H Flat 1 Peabody Estate SE1 0TJ
Block G Flat 1 Peabody Estate SE1 0TH
25 Bear Pit Apartments 14 New Globe Walk SE1 9DR
Cafe 1 Bear Gardens SE1 9ED
South Building Part Third Floor 185 Park Street SE1 9BL
Suite Two Third Floor South Building 185 Park Street SE1 9BL
Suite 4 Ground Floor South Building 185 Park Street SE1 9BL
Suite Five Ground Floor South Building 185 Park Street SE1 9BL
First Floor Intel House SE1 9HF
Ground Floor Intel House SE1 9HF
Basement Intel House SE1 9HF
Second Floor Intel House SE1 9HF
Third Floor Intel House SE1 9HF
Part Fifth Floor Blue Fin Building SE1 0SU
Suite One Third Floor South Building 185 Park Street SE1 9BL
Excluding First Part Second Fourth Eleventh West And South Twelfth And Second East
Fin Building SE1 0SU
7 Bear Pit Apartments 14 New Globe Walk SE1 9DR
1605 Block C 70 Holland Street SE1 9NX
1603 Block C 70 Holland Street SE1 9NX
1602 Block C 70 Holland Street SE1 9NX
1701 Block C 70 Holland Street SE1 9NX
1705 Block C 70 Holland Street SE1 9NX
1703 Block C 70 Holland Street SE1 9NX
1702 Block C 70 Holland Street SE1 9NX
1601 Block C 70 Holland Street SE1 9NX
1405 Block C 70 Holland Street SE1 9NX
1403 Block C 70 Holland Street SE1 9NX
1402 Block C 70 Holland Street SE1 9NX
1501 Block C 70 Holland Street SE1 9NX
1505 Block C 70 Holland Street SE1 9NX
1503 Block C 70 Holland Street SE1 9NX
1502 Block C 70 Holland Street SE1 9NX
1801 Block C 70 Holland Street SE1 9NX
102 Block D 5 Sumner Street SE1 9RE
101 Block D 5 Sumner Street SE1 9RE
103 Block D 5 Sumner Street SE1 9RE
106 Block D 5 Sumner Street SE1 9RE
105 Block D 5 Sumner Street SE1 9RE
104 Block D 5 Sumner Street SE1 9RE
2201 Block C 70 Holland Street SE1 9NX
1902 Block C 70 Holland Street SE1 9NX
1901 Block C 70 Holland Street SE1 9NX
1802 Block C 70 Holland Street SE1 9NX
2001 Block C 70 Holland Street SE1 9NX
2102 Block C 70 Holland Street SE1 9NX
2101 Block C 70 Holland Street SE1 9NX
2002 Block C 70 Holland Street SE1 9NX
901 Block C 70 Holland Street SE1 9NX
805 Block C 70 Holland Street SE1 9NX
803 Block C 70 Holland Street SE1 9NX
902 Block C 70 Holland Street SE1 9NX
1001 Block C 70 Holland Street SE1 9NX
905 Block C 70 Holland Street SE1 9NX
903 Block C 70 Holland Street SE1 9NX
802 Block C 70 Holland Street SE1 9NX
701 Block C 70 Holland Street SE1 9NX
605 Block C 70 Holland Street SE1 9NX
603 Block C 70 Holland Street SE1 9NX
702 Block C 70 Holland Street SE1 9NX
801 Block C 70 Holland Street SE1 9NX
705 Block C 70 Holland Street SE1 9NX
703 Block C 70 Holland Street SE1 9NX
1002 Block C 70 Holland Street SE1 9NX
1301 Block C 70 Holland Street SE1 9NX
1205 Block C 70 Holland Street SE1 9NX
1203 Block C 70 Holland Street SE1 9NX
1302 Block C 70 Holland Street SE1 9NX
1401 Block C 70 Holland Street SE1 9NX
1305 Block C 70 Holland Street SE1 9NX
1303 Block C 70 Holland Street SE1 9NX
1202 Block C 70 Holland Street SE1 9NX
1101 Block C 70 Holland Street SE1 9NX

Flat 38 Old Theatre Court SE1 9ES
Flat 37 Old Theatre Court SE1 9ES
Flat 50 Old Theatre Court SE1 9ES
Flat 53 Old Theatre Court SE1 9ES
Flat 52 Old Theatre Court SE1 9ES
Flat 51 Old Theatre Court SE1 9ES
62-76 Park Street London SE1 9DZ
105 Sumner Street London SE1 9HZ
Flat 6 Anchor Terrace SE1 9HQ
Shakespeare Globe Theatre 21 New Globe Walk
SE1 9DT
Bankside House 24 Sumner Street SE1 9JA
22 New Globe Walk London SE1 9DR
13 Gatehouse Square London SE1 9HN
12 Gatehouse Square London SE1 9HN
11 Gatehouse Square London SE1 9HN
14 Gatehouse Square London SE1 9HN
15 Gatehouse Square London SE1 9HN
Flat 1 Old Theatre Court SE1 9ES
Flat 13 Old Theatre Court SE1 9ES
Flat 12 Old Theatre Court SE1 9ES
Flat 11 Old Theatre Court SE1 9ES
Flat 15 Old Theatre Court SE1 9ES
Flat 18 Old Theatre Court SE1 9ES
Flat 17 Old Theatre Court SE1 9ES
Flat 16 Old Theatre Court SE1 9ES
Flat 10 Old Theatre Court SE1 9ES
Flat 5 Old Theatre Court SE1 9ES
Flat 3 Old Theatre Court SE1 9ES
Flat 2 Old Theatre Court SE1 9ES
Flat 6 Old Theatre Court SE1 9ES
Flat 9 Old Theatre Court SE1 9ES
Flat 8 Old Theatre Court SE1 9ES
Flat 7 Old Theatre Court SE1 9ES
Flat 6 Benbow House SE1 9DS
Flat 5 Benbow House SE1 9DS
Flat 7 Benbow House SE1 9DS
Flat 10 Benbow House SE1 9DS
Flat 9 Benbow House SE1 9DS
Flat 8 Benbow House SE1 9DS
Flat 17 21 Great Guildford Street SE1 9EP
Flat 12 21 Great Guildford Street SE1 9EP
Flat 11 21 Great Guildford Street SE1 9EP
Flat 10 21 Great Guildford Street SE1 9EP
Flat 13 21 Great Guildford Street SE1 9EP
Flat 16 21 Great Guildford Street SE1 9EP
Flat 15 21 Great Guildford Street SE1 9EP
Flat 14 21 Great Guildford Street SE1 9EP
Flat 11 Benbow House SE1 9DS
Flat 23 Benbow House SE1 9DS
Flat 22 Benbow House SE1 9DS
Flat 21 Benbow House SE1 9DS
Flat 24 Benbow House SE1 9DS
Flat 27 Benbow House SE1 9DS
Flat 26 Benbow House SE1 9DS
Flat 25 Benbow House SE1 9DS
Flat 20 Benbow House SE1 9DS
Flat 14 Benbow House SE1 9DS
Flat 13 Benbow House SE1 9DS
Flat 12 Benbow House SE1 9DS
Flat 15 Benbow House SE1 9DS
Flat 19 Benbow House SE1 9DS
Flat 18 Benbow House SE1 9DS
Flat 17 Benbow House SE1 9DS
Flat 19 Anchor Terrace SE1 9HQ
Flat 18 Anchor Terrace SE1 9HQ
Flat 17 Anchor Terrace SE1 9HQ
Flat 20 Anchor Terrace SE1 9HQ
Flat 23 Anchor Terrace SE1 9HQ
Flat 22 Anchor Terrace SE1 9HQ
Flat 21 Anchor Terrace SE1 9HQ
Flat 16 Anchor Terrace SE1 9HQ
Flat 11 Anchor Terrace SE1 9HQ
Flat 10 Anchor Terrace SE1 9HQ

1005 Block C 70 Holland Street SE1 9NX
1003 Block C 70 Holland Street SE1 9NX
1102 Block C 70 Holland Street SE1 9NX
1201 Block C 70 Holland Street SE1 9NX
1105 Block C 70 Holland Street SE1 9NX
1103 Block C 70 Holland Street SE1 9NX
904 Block D 5 Sumner Street SE1 9RE
903 Block D 5 Sumner Street SE1 9RE
902 Block D 5 Sumner Street SE1 9RE
1001 Block D 5 Sumner Street SE1 9RE
Ipc Media Blue Fin Building SE1 0SU
Flat 617 Bankside House SE1 9JA
1002 Block D 5 Sumner Street SE1 9RE
901 Block D 5 Sumner Street SE1 9RE
704 Block D 5 Sumner Street SE1 9RE
703 Block D 5 Sumner Street SE1 9RE
702 Block D 5 Sumner Street SE1 9RE
801 Block D 5 Sumner Street SE1 9RE
804 Block D 5 Sumner Street SE1 9RE
803 Block D 5 Sumner Street SE1 9RE
802 Block D 5 Sumner Street SE1 9RE
Donovan Data Systems Blue Fin Building SE1 0TA
2 Bear Pit Apartments 14 New Globe Walk SE1 9DR
1 Bear Pit Apartments 14 New Globe Walk SE1 9DR
Unit 16 100 Southwark Street SE1 0SW
3 Bear Pit Apartments 14 New Globe Walk SE1 9DR
6 Bear Pit Apartments 14 New Globe Walk SE1 9DR
5 Bear Pit Apartments 14 New Globe Walk SE1 9DR
4 Bear Pit Apartments 14 New Globe Walk SE1 9DR
Seventh Floor Front Riverside House SE1 9HA
Tenth Floor Riverside House SE1 9HA
Str Global Ltd Blue Fin Building SE1 0TA
Suite Seven Part First Floor South Building 185 Park Street SE1 9DY
South Building Ground Floor 5 185 Park Street SE1 9DY
Suite Three Part First Floor South Building 185 Park Street SE1 9DY
305 Block D 5 Sumner Street SE1 9RE
304 Block D 5 Sumner Street SE1 9RE
303 Block D 5 Sumner Street SE1 9RE
306 Block D 5 Sumner Street SE1 9RE
403 Block D 5 Sumner Street SE1 9RE
402 Block D 5 Sumner Street SE1 9RE
401 Block D 5 Sumner Street SE1 9RE
302 Block D 5 Sumner Street SE1 9RE
203 Block D 5 Sumner Street SE1 9RE
202 Block D 5 Sumner Street SE1 9RE
201 Block D 5 Sumner Street SE1 9RE
204 Block D 5 Sumner Street SE1 9RE
301 Block D 5 Sumner Street SE1 9RE
206 Block D 5 Sumner Street SE1 9RE
205 Block D 5 Sumner Street SE1 9RE
404 Block D 5 Sumner Street SE1 9RE
603 Block D 5 Sumner Street SE1 9RE
602 Block D 5 Sumner Street SE1 9RE
601 Block D 5 Sumner Street SE1 9RE
604 Block D 5 Sumner Street SE1 9RE
701 Block D 5 Sumner Street SE1 9RE
606 Block D 5 Sumner Street SE1 9RE
605 Block D 5 Sumner Street SE1 9RE
506 Block D 5 Sumner Street SE1 9RE
501 Block D 5 Sumner Street SE1 9RE
406 Block D 5 Sumner Street SE1 9RE
405 Block D 5 Sumner Street SE1 9RE
502 Block D 5 Sumner Street SE1 9RE
505 Block D 5 Sumner Street SE1 9RE
504 Block D 5 Sumner Street SE1 9RE
503 Block D 5 Sumner Street SE1 9RE
52 Grove Lane London SE5 8ST
25 Aoleshaw House Camberwell SE5 8DW
Flat 14, 1-3 Comber Grove London SE5 0AS
30 Heber Road London SE22 9LA
Flat 2, 160 Benhill Road Camberwell SE57LZ
Graces Road X
204 Camberwell Grove London SE5 8RJ

Re-consultation: 26/05/2015

Consultation responses received**Internal services**

Flood and Drainage Team

Statutory and non-statutory organisations

City of Westminster
 English Heritage
 Environment Agency
 Historic England
 London Borough of Islington
 London Borough of Tower Hamlets
 London Fire & Emergency Planning Authority
 London Underground Limited
 Natural England - London Region & South East Region
 Network Rail (Planning)
 Port of London Authority
 Sport England
 Thames Water - Development Planning
 Transport for London (referable & non-referable app notifications and pre-apps)

Neighbours and local groups

Block I Flat 11 Peabody Estate SE1 0TL
 Email representation
 Email representation
 Email representation
 Email representation
 Email representation
 Email representation
 Flat 10 Old Theatre Court SE1 9ES
 Flat 13 Old Theatre Court SE1 9ES
 Flat 14, 1-3 Comber Grove London SE5 0AS
 Flat 2, 160 Benhill Road Camberwell SE57LZ
 Flat 22 Benbow House SE1 9DS
 Flat 22 20 New Globe Walk SE1 9DX
 Flat 34 20 New Globe Walk SE1 9DX
 Flat 6 20 New Globe Walk SE1 9DX
 Flat 67 Benbow House SE1 9DS
 Flat 68 Benbow House SE1 9DS
 Graces Road X
 Shakespeare Globe Theatre 21 New Globe Walk SE1 9DT
 Shakespeare Globe Theatre 21 New Globe Walk SE1 9DT
 16 Sears Street Camberwell SE5 7JL
 204 Camberwell Grove London SE5 8RJ
 25 Aoleshaw House Camberwell SE5 8DW
 30 Heber Road London SE22 9LA
 414 Bankside Lofts 65 Hopton Street SE1 9GZ
 512 Bankside Lofts London SE1 9GZ
 52 Grove Lane London SE5 8ST
 55 Sumner Buildings Sumner Street SE1 9JY