

Item No. 6.1	Classification: Open	Date: 22 March 2016	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 15/AP/4000 for: Full Planning Permission Address: 14-21 RUSHWORTH STREET, LONDON, SE1 0RB Proposal: Demolition of existing buildings and erection of a new part five, part six storey building to provide commercial floorspace at lower ground, ground and first floor level (Use Class B1) and 47 residential units (Use Class C3) on first to fifth floor levels associated disabled car parking, cycle parking and landscaping.		
Ward(s) or groups affected:	Cathedrals		
From:	Director of Planning		
Application Start Date 07/10/2015		Application Expiry Date 06/01/2016	
Earliest Decision Date 08/11/2015		Planning Performance Agreement Date: 30 June 2016	

RECOMMENDATIONS

1. a) That planning permission be granted, subject to conditions and the applicant entering into a satisfactory legal agreement.
- b) That in the event that a satisfactory legal agreement is not entered into by 30 June 2016 the Director of Planning refuses planning permission, if appropriate, for the reason set out in paragraph 130 of the officer report.

BACKGROUND INFORMATION

Site location and description

2. The site is located on the south-western side of Rushworth Street, to the east of Blackfriars Road. It comprises two, two storey brick buildings used for light industrial purposes, known as Friars Court. It has an off street service and parking area, accessed directly from Rushworth Street. The building is currently occupied by a courier company, a media company, a catering company and as an artist studio/storage unit. There are no trees on the site.
3. The surrounding area contains a mix of uses including residential, commercial and educational. Immediately adjoining to the north is 10-13 Rushworth Street, a recently constructed 5 storey building providing offices and residential. To the south, at 24-28 Rushworth Street, is a part 3, part 4 storey office building which also has a frontage onto Webber Street. It is known as the Colorama Building. Opposite the site on the other side

of Rushworth Street are two residential buildings known as Chadwick House and Ripley House, both of which are Grade II listed. Also opposite, at 33-38 Rushworth Street is a two storey brick building occupied by St Mungo's charity. At 40 Rushworth Street, is a site formerly known as Newspaper House, where a new development of up to five storeys is being constructed. A further residential building exists to the south, fronting onto Webber Street known as Waterloo Mansions. To the west is the Friars Primary School.

4. The site is not within a designated conservation area, but lies immediately opposite the Kings Bench Conservation Area.

Details of proposal

5. The proposal is for the demolition of the existing buildings to enable a residential led mixed use redevelopment. Commercial floorspace, totalling 2,566sqm GIA would be provided at basement, ground and part first floor levels with residential (47 units) on 1st to 5th floor levels. Courtyard amenity space is proposed at basement level for the office workers, with amenity space for the residents, including playspace provided at roof level. Affordable housing is proposed on the site, with social rented and intermediate rented housing provided.
6. The building would be up to 6 storeys high, with set backs incorporated at fourth and fifth floor levels. The building would be predominantly brick in character.
7. The proposal does not include any general car parking spaces. Two accessible parking spaces are provided at ground floor level. Servicing and refuse collection is proposed directly from Rushworth Street. Cycle storage, refuse storage and plant would be provided at basement level.
8. Revised plans were submitted to address a number of comments made by officers, residents and the Design Review Panel. The revised plans have introduced more commercial floorspace into the development (at first floor level) and have sought to make a number of design changes including some set backs to reduce the daylight and sunlight impacts to the adjoining neighbours. The revised plans were subject to a 14 day re-consultation.

Planning history

9. Pre-application advice was provided in advance of the application. A number of meetings were held with the applicant prior to the submission of this application. The discussions centred around the provision of office floorspace, the height, scale and massing of the development and impact on nearby heritage assets, the internal layout in relation to office and housing quality, the daylight impact to neighbouring properties, affordable housing, and transport impacts.
10. In addition, a prior approval application for demolition of the existing buildings (ref 16/AP/0444) has been received at the time of writing.

Planning history of adjoining sites

10-13 Rushworth Street

11. 13/AP/0943 Planning permission granted with legal agreement on 2 July 2013 for the

Demolition of existing building and erection of a five storey plus basement building comprising of office floorspace (B1) on lower ground, ground and first floors with 9 (3x 1 beds, 4x 2 beds, 2x 3 beds) residential apartments above, amenity space, refuse/recycling stores, cycle storage and plant/equipment. This development has now been completed.

24-28 Rushworth Street and 61 Webber Street

12. 15/AP/2705 Planning application submitted on 25 June 2015 for the Demolition of the existing building and erection of part six part eight storey (plus basement) mixed use building comprising 40 residential units (15 x 1 bed, 18 x 2 bed & 7 x 3 bed) (use class C3) and 2241 sqm (GIA) flexible commercial space (use class B1) and associated works. This application is under consideration.

40 Rushworth Street

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

KEY ISSUES FOR CONSIDERATION

Summary of main issues

14. The main issues to be considered in respect of this application are:
 - i) principle of the proposed development in terms of land use
 - ii) affordable housing provision
 - iii) design and impact upon the setting of adjacent listed buildings and conservation areas
 - iv) housing mix and density
 - v) quality of accommodation
 - vi) impact on the amenities of occupiers of adjoining properties
 - vii) traffic issues, including level of car parking
 - viii) flood risk
 - ix) planning obligations; and
 - x) sustainable development implications.

Planning policy

15. The statutory development plan for the borough comprises the London Plan 2015, the Southwark Core Strategy 2011, and saved policies of the Southwark Plan (2007). The site falls within the area covered by the Blackfriars Road SPD.
16. The site is located within the:
 - Central Activities Zone (CAZ)
 - Bankside, Borough and London Bridge Opportunity Area
 - Air Quality Management Area
 - Borough and Bankside District Town Centre
 - Blackfriars Road SPD area.

17. It has a Public Transport Accessibility Level (PTAL) of 6b where 1 is the lowest level and 6b the highest.
18. The following Grade II listed buildings are opposite the site:
 - Ripley House, Rushworth Street; and
 - Chadwick House, Rushworth Street.
19. The site falls outside of a designated conservation area, but lies immediately opposite the Kings Bench conservation area.

National Planning Policy Framework (the Framework)

20. 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 12: Conserving and enhancing the historic environment

London Plan July 2015

21. Policy 2.13 Opportunity areas and Intensification areas
 - Policy 3.3 Increasing housing supply
 - Policy 3.5 Quality and design of housing developments
 - Policy 3.6 Children and young people's play and informal recreation facilities
 - Policy 3.8 Housing choice
 - Policy 3.9 Mixed and balanced communities
 - Policy 3.10 Definition of affordable housing
 - Policy 3.11 Affordable housing targets
 - Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
 - Policy 3.13 Affordable housing thresholds
 - Policy 5.7 Renewable energy
 - Policy 5.8 Innovative energy technologies
 - Policy 5.11 Green roofs and development site environs
 - Policy 5.12 Flood risk management
 - Policy 5.13 Sustainable drainage
 - Policy 5.21 Contaminated land
 - Policy 6.9 Cycling
 - Policy 6.10 Walking
 - Policy 6.13 Parking
 - Policy 7.2 An inclusive environment
 - Policy 7.3 Designing out crime
 - Policy 7.4 Local character
 - Policy 7.6 Architecture
 - Policy 7.7 Location and design of tall and large buildings
 - Policy 7.8 Heritage assets and archaeology

Policy 8.2 Planning obligations
Policy 8.3 Community infrastructure levy

Core Strategy 2011

22. 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 5 - Providing new homes
 - Strategic Policy 6 - Homes for people on different incomes
 - Strategic Policy 7 - Family homes
 - Strategic Policy 10 - Jobs and businesses
 - Strategic Policy 11 - Open spaces and wildlife
 - Strategic Policy 12 - Design and conservation
 - Strategic Policy 13 - High environmental standards
 - Strategic Policy 14 - Implementation and Delivery

Southwark Plan 2007 (July) - saved policies

23. The council's cabinet on 19 March 2013, as required by paragraph 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

24. The relevant 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 3.28 Biodiversity
- Policy 3.31 Flood Defences
- Policy 4.1 Density of Residential Development
- Policy 4.2 Quality of Residential Development

Policy 4.3 Mix of Dwellings
Policy 4.4 Affordable Housing
Policy 4.5 Wheelchair Affordable Housing
Policy 5.1 Locating Developments
Policy 5.2 Transport Impacts
Policy 5.3 Walking and Cycling
Policy 5.6 Car Parking
Policy 5.7 Parking Standards for Disabled People and the Mobility Impaired

Relevant SPD's/SPG's

25. Section 106 Planning Obligations SPD
Residential Design Standards SPD October 2011
Draft Bankside, Borough and London Bridge SPD February 2010
Blackfriars Road SPD 2014
Housing SPG 2012 (SPG to the London Plan)
Use of planning obligations in the funding of Crossrail 2010
Providing for Children and Young People's Play and Informal Recreation 2008 (SPG to the London Plan)
Affordable Housing SPD (2008 – Adopted and 2011 – Draft)
Draft Southwark Viability SPD 2015
Kings Bench Conservation Area Appraisal 2010

Principle of development

26. 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.
27. The NPPF promotes the delivery of a wide choice of high quality homes, seeks to widen opportunities for home ownership and create sustainable, inclusive and mixed communities. It encourages the effective use of land by reusing land that has been previously developed and also promotes mixed use developments. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.
28. The site is located within the Bankside, Borough and London Bridge Opportunity Area, as designated by the London Plan. The London Plan supports mixed use developments in the Opportunity Area, including housing and employment generating uses.
29. The site is also 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 as well as improved streets and community facilities.
30. The site is also within 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 residential and employment uses.

31. 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 to 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. 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. It goes further to state that where an increase in floorspace is proposed, the additional floorspace may be used for suitable mixed or residential use.
32. The Blackfriars Road SPD was adopted in 2014. It states that opportunities to increase the amount and type of development will be maximised, particularly opportunities for flexible innovative business space, which is designed flexibly to accommodate a range of unit sizes. It states that such space can be developed alongside residential development in order to increase activity and strengthen the appeal of the area to visitors and to a wide range of occupiers. The SPD also requires existing business floorspace to be retained or replaced.

Offices

33. The proposal replaces and exceeds the existing employment floorspace currently on the site; with 2,566sqm GIA provided where as the existing floorspace is 2,048sqm GIA. The space would be provided at basement, ground and first floor levels. The space at basement level would be somewhat compromised, owing to the limited outlook through the limited depth of light wells and courtyards. This could limit the range of potential occupiers and the scope for some functions. However, the applicant has provided an opinion from a commercial letting agent that the space would be marketable, and the overall provision does include well-lit space on ground and first floors. The space at first floor level (which was shown as residential units in the original submission) was introduced as a revision to the application, and the total office space now forms a significant proportion of the development and would enable a range of uses and functions.
34. The office space has been provided with two separate entrances and is capable of being used by a range of small to medium sized businesses. In addition, it has the potential to be used flexibly with the space capable of subdivision. The office workers would have access to amenity space in the form of courtyards at rear basement level, which would be an additional benefit. In conclusion, the uplift in commercial floorspace is a significant benefit of the scheme and would help reinforce the role of Bankside as a major employment hub for a range of business types. The replacement of warehouse/light industrial space with office/business functions would also increase the employment density on the site, enabling an uplift in employment from approximately 20 employees as existing, to 200.

Residential

35. The proposed development comprises 47 new homes. The provision of residential accommodation is supported by the London Plan, the saved Southwark Plan and the Core Strategy.

36. London Plan Policy 3.3 supports the provision of a range of housing and sets the borough a target of 27,362 new homes between 2015 and 2025. Strategic Policy 5 of the Core Strategy seeks high quality new homes in attractive environments. It states that development will provide as much housing as possible whilst also making sure that there is enough land for other types of development. The policy sets a target of 24,450 net new homes between 2011 and 2026. A key objective is to provide as much new housing as possible and create places where people would want to live. In addition, saved policy 1.4 of the Southwark Plan supports the provision of additional floorspace in town and local centres for residential use.
37. The proposed 47 new residential units and 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 later in the report.

Conclusion on land use

38. The proposal is for a mixed use development comprising of residential and offices. The proposed mix of uses is in conformity with the aspirations of the opportunity area, central activity zone and Bankside and Borough town centre and accordingly is supported. It is recognised that the proposal more than replaces the existing Class B floorspace on the site, which is positive. Whilst some of the space is located at basement level, the provision of courtyards and light wells could make the space attractive and it is considered that the overall level of provision would attract many types of occupiers. The development would also provide a number of new homes, which is a priority of the current Government as well as local and London wide planning policies.

Environmental impact assessment

39. In 2015 the Town and Country Planning (Environmental Impact Assessment (Amendment) Regulations) were issued, which raised and amended the thresholds at which certain types of development project need to be screened in order to determine whether an environmental impact assessment is required.
40. EIA Development is defined as meaning either:
 - a) Schedule 1 development
 - b) Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.
41. The proposed development does not fall within the definition of Schedule 1. Schedule 2 development is defined by the EIA Regulations as:

Development of a description mentioned in Column 1 of the table in Schedule 2 where:

- a) any part of that development is to be carried out in a sensitive area; the site is not located in a sensitive area as defined by the Regulation
 - b) any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development.
42. Column 1 of the table in Schedule 2, Category 10 (b), relates to 'Urban Development

Projects'. The proposed development would be an Urban Development Project and as such is development of a description mentioned in Column 1 of the table in Schedule 2. Consequently the proposed development would constitute Schedule 2 development within the meaning of the EIA Regulations if the corresponding threshold in Column 2 of the table in Schedule 2 is exceeded or met. The corresponding threshold was amended by the 2015 Regulations, the relevant part of which reads as follows: In the case of urban development projects, the existing threshold of 0.5 hectares is raised and amended such that a project will need to be screened if:

- the development includes more than 1 hectare of development which is not dwellinghouse development
- the development includes more than 150 dwellinghouses
- the area of the development exceeds 5 hectares.

43. None of the above are applicable in this instance because the development would not include more than 1ha of development which is not dwellinghouse development, would not include more than 150 dwellinghouses, and the area of the development would not exceed 5ha (the site area is 0.17ha). In light of this no further screening is required and it is concluded that the development would not constitute EIA development.

Affordable housing

44. Strategic policy 6 of the Core Strategy 'Homes for people on different incomes' requires at least 35% of the residential units to be affordable. For developments of 15 or more units affordable housing is calculated as a percentage of the habitable rooms rather than total number of units. In accordance with saved policy 4.5 of the Southwark Plan, for every affordable housing unit which complies with the wheelchair design standards one less affordable habitable room will be required. With regard to tenure, saved policy 4.4 of the Southwark Plan requires a split of 70% social rented: 30% intermediate. All of the affordable units should be provided on site and a mix of housing types and sizes for the affordable units would be required. For the purposes of calculating affordable housing, kitchens less than 11sqm are not counted and rooms larger than 27.5sqm are counted as two habitable rooms.
45. In total, when taking into account habitable rooms over 27.5sqm, 147 habitable rooms would be provided in the development. In order to achieve 35% affordable housing, the development would need to provide 51 affordable habitable rooms, although this would be reduced to 48 because 3 affordable wheelchair accessible habitable units would be provided, and plans have been submitted to demonstrate this. After a period of negotiation during the course of the application which resulted in the quantum of affordable housing being significantly increased, the proposed development would provide a total of 48 affordable habitable rooms which would equate to an overall provision of 33%. The level of provision, after taking into account the wheelchair discount, is therefore acceptable and policy compliant. Viability information has been submitted which supports the delivery of the quantum of affordable housing proposed.
46. With regard to tenure split, out of the 48 affordable habitable rooms, 32 would be social rented (66%) and 16 would be intermediate rented (33%). This split does not fully comply with the 70% social rented and 30% intermediate required by the policy but the degree of deviance equates to less than one unit and is acceptable.

Table: Affordable Housing

Units	Social rented	Intermediate rented	Total
1 bed	1		1
2 bed	2	4	6
3 bed	3		3
4 bed	2		2
Total	8	4	12

47. The proposal would provide a total of 12 affordable units in a mix of unit sizes, including larger social rented family sized units, which is a positive aspect of the scheme. A section 106 agreement is recommended to secure the delivery of these units, including a clause preventing more than 50% of the private units from being occupied until the affordable units have been completed.

Design and impact upon the setting of adjacent listed buildings and conservation areas

48. The site currently comprises of two two-storey brick industrial units and a central parking and servicing area. Whilst it is not located in a conservation area, the buildings on the opposite side of Rushworth Street form part of the Kings Bench Conservation Area. Ripley House and Chadwick House opposite are both Grade II listed buildings. It is recognised that the existing buildings are of low architectural quality, and do not provide much activity or animation to the street. Accordingly, it is accepted that there is potential to develop the site and create a building which provides more interaction with the street, as well as responding appropriately to the Kings Bench Conservation Area and listed buildings.

Height and massing

49. The building is six storeys in height, with the top two floors set back from front face of the building. The four storey base is intended to reflect the scale of the buildings on Rushworth Street with the upper two storeys set back so as to remain more subservient and limit their impact on street level views within Rushworth Street, and on the setting of the conservation area and listed buildings within it. Buildings opposite and within the conservation area are of two, three and four storeys in height and the proposed four storey shoulder height would create a well balanced streetscape along Rushworth Street.
50. The long street frontage of the proposed development to Rushworth Street has been subdivided into three elements, which are similar in their articulation and material palette. Within the longest central section, a series of bays would create a vertical rhythm that would complement the grain and vertical emphasis of the existing streetscape such as that of Ripley House. On either side of the central section, the building is more mannered in its design, it rises sheer from pavement level and incorporates piers and gables. In this way, the design has the potential to break up the street frontage and reinstates the more traditional plot width which was disrupted by the current arrangement of 1980s warehouses.
51. The submitted views analysis demonstrates that the development would integrate comfortably within the existing townscape, to the existing buildings on both sides of

Rushworth Street, and would not be unduly prominent in views. It is noted that the recently completed development immediately adjacent at 10-13 Rushworth Street would have a lower shoulder height, but despite this, it is considered that the proposed building would not harm the views along Rushworth Street. The setback of the upper storeys would limit the perception of the six storey overall height with the four storey shoulder height reading as the dominant feature. On this basis, the building is considered to be of an acceptable and appropriate height.

Detailed design and materials

52. The building has made reference to the listed Ripley House opposite by incorporating vertical bays into its front façade. The rear elevation incorporates a brick base with a series of bays with irregular sized windows and projecting balconies; it is somewhat monotonous and repetitive in character but is less visible from the surrounding public townscape. The commercial space at ground and first floor levels would provide an active frontage to animate the street, which is a benefit when compared to the existing. In terms of materials, brick would be the predominant material, reflecting the surrounding context. Textured brickwork and balcony detailing would add interest in closer street views. The colour of the brick is however rather dark, and given the narrow width of the street and the lighter tone of the brick on other buildings, could be overbearing and accordingly, samples of alternatives should be requested by condition. Overall, the architectural treatment would create an appropriate balance of solid to void and vertical to horizontal that would relate well to the robustness of the conservation area. The use of brick would create a clear visual connection to the majority of buildings in the street.
53. At roof level, two amenity spaces are provided for the residents of the development. The plans show the provision of seating, planting beds and play space for children. Further details of the layout and landscaping of the space are requested by condition, including details of the boundary treatment.

The impact on the historic setting of heritage assets

54. The adjoining Kings Bench Conservation Area is a small, compact conservation area. In respect of Rushworth Street, the adopted King's Bench Conservation Area Appraisal states: "the west side of Rushworth Street (figure 14) is outside the conservation area. However, the east side forms a microcosm of the area as a whole: principally brick faced; one, two and three storeys high; with industrial development at the southern end, social housing in the middle and (originally) religious uses to the north." The proposed development, by maintaining the mix of uses, commercial and residential and respecting the prevailing scale of Rushworth Street at its 'shoulder' height and echoing the bay design of the listed Ripley Building directly opposite, will complement this sensitive historic context. Accordingly officers are satisfied that the proposal will preserve the setting of the Kings Bench Conservation Area.

Secured by design

55. At ground floor level, the building would have a good proportion of glazed windows into the office space providing natural surveillance. Doors and entrances would feature electronic locking and would be lit and appropriately signed. In line with the recommendation from the Metropolitan Police, a condition will be attached requiring secured by design accreditation.

Comments of the Design Review Panel

56. An earlier version of the scheme was presented to Design Review Panel in October 2015. In summary, the panel did not feel that the site could accommodate such a dense approach and felt strongly that the quantum of both office and residential accommodation was unacceptable. They did not believe that the office space at lower ground floor level would receive adequate daylight or sunlight and queried the quality of the courtyard spaces proposed. The quality of the residential accommodation was queried in relation to the high proportion of single aspect units, long narrow rooms, 'slot' windows being the only source of natural light for bedrooms, overlooking between bedrooms and poor quality amenity spaces. The panel were unconvinced that the site could accommodate two storeys on top of the four storey shoulder height and considered that the building would considerably overshadow the street and the buildings opposite.
57. As referred to in paragraph 8 above, revised drawings were submitted to address some of these concerns. Specifically, they have introduced more commercial floorspace into the development (at first floor level) and have sought to make a number of design changes including set backs at parapet level and to the building line in order to better respond to the street. The changes made resulted in a reduction in the number of units, from 54 to 47. Officers consider that the changes made have adequately addressed the comments made by the panel and the scheme is much improved as a consequence, and it was not invited to return to the Panel.

Housing mix and density

58. Saved Policy 4.3 of the Southwark Plan requires a mix of dwellings sizes and types to be provided within major new developments in order to cater for a range of housing needs. There is a particular need for family units in the borough and therefore policy requires that the majority of units should have two or more bedrooms and at least 20% three or more bedrooms with direct access to private outdoor amenity space. At least 10% of the units should be suitable for wheelchair users.
59. Strategic Policy 7 of the Core Strategy increases the proportion of two bed plus accommodation to be provided and expects 60% of developments to have more than two bedrooms, and in this area at least 20% 3, 4, or 5 bedrooms. A maximum of 5% as studios and only for private housing. The mix of units provided is shown in the table below.

Table: Unit mix

	Total number units (number)	Total Units (%)
Studios	1	2%
1 bed	12	26%
2 bed	26	55%
3 bed	5	11%
4 bed	3	6%
Total units	47	100%

60. 72% of units would have two or more bedrooms; this exceeds the 60% target and is a positive aspect of the scheme. 17% of the units would have three or more bedrooms,

falling short of the expected 20% provision. It should be noted that this shortfall has arisen because of the additional commercial floorspace introduced at first floor level, in lieu of family sized units originally provided here. It is noted that within the affordable tenure there is a larger proportion of family sized units, with 42% of the affordable units having 3 or 4 bedrooms. On balance, the shortfall is considered acceptable in this instance, and has enabled the provision of additional workspace. The numbers of studios proposed, at 2%, would not exceed the 5% maximum and therefore is acceptable.

61. Five wheelchair units (11% units) would be provided. The units would be provided in the social, intermediate and private tenures and across a range of unit sizes, with 3 x 1 bed units, 1 x 2 bed unit and 1 x 4 bed unit being provided. This is considered acceptable and appropriate. The social rented and intermediate wheelchair units would be required to be fully fitted for first occupation, with private units being adaptable.
62. 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.
63. The development as a whole would have a density 1,413 habitable rooms per hectare. Since the maximum upper limit of 1100hrh would be 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 would not raise any issues to warrant withholding permission. These issues are discussed later in the report.

Quality of accommodation

64. Saved Policy 4.2 of the Southwark Plan advises that planning permission will be granted provided the proposal achieves good quality living conditions. The standards in relation to internal layout are set out in the adopted Residential Design Standards SPD 2011 and include guidance on overlooking standards as well as requiring the predominance of dual aspect accommodation.
65. The following table sets out the minimum flat size requirements as set out in the adopted SPD 2008 and the Update to the Residential Design Standards 2011, and also the flat sizes that would be achieved.

Table: Unit Sizes

Unit type	SPD (sqm)	Size range proposed (sqm)
Studio	37	37
1 bed 2 person	50	50-65
2 bed 3 person	61	62-80

2 bed 4 person	70	71-88
3 bed 4 person	74	80
3 bed 5 person	86	85
3 bed 6 person	95	113-116
4 bed 5 person	90	97-102
4 bed 6 person	99	120

66. The flat sizes comfortably meet the standards as set out in the SPD, with the exception of one 3 bed 5 person flat which falls 1 sqm short of the minimum standard of 86sqm (however it would comfortably meet the standard for a 3 bed/4 person unit). Only 38% of the units would be considered as true dual aspect which does not achieve the predominance of dual aspect units required by the Residential Design Standards SPD. Many of the single aspect units are those fronting Rushworth Street, arranged around a bay window formation which would not achieve benefits such as cross ventilation. However access to sunlight, and a range of views up and across the street would be possible. Space has been allocated for storage and all kitchens would enjoy natural light and ventilation. There would be no single aspect north facing units. The single aspect units are therefore otherwise acceptable, meeting the minimum floor sizes as required by the SPD and with private balconies provided to each. Overall, it is therefore considered that the significant proportion of single aspect windows would not result in a substandard level of accommodation to warrant withholding consent.

Internal daylight (daylight within the new flats)

67. A total of 143 habitable rooms were tested within the proposed development. 86% (123 out of 143) meet or exceed the required minimum Average Daylight Factor for the room type. Of the 20 rooms falling short of ADF, most are located beneath balconies which overhang the glazing and therefore reduce their daylight potential. An assessment has been carried out with balconies removed, and this shows an increased proportion of rooms, at 98% (140 out of 143) would meet the required daylight standard.
68. It is therefore considered that the proposed units would achieve a reasonable standard of internal daylight.

Privacy

69. 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.
70. Some of the residential units are orientated such that they would be located 14m away from the habitable rooms of a different flat within the development. At 14m, the distance falls short of the required minimum of 21m and therefore could cause un-neighbourly overlooking. In addition, some balconies belonging to different flats are positioned very close to each other and also to windows belonging to other flats, again with more potential for overlooking to occur. As mitigation, most of the affected flats are provided with aspect in another direction, and so the amenity from the flats would not be unreasonably compromised. Balcony screening should be provided by condition, with details of materials, height and level of privacy that would be achieved.

Amenity space

71. 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 10sqm per child bed space (covering a range of age groups).

72. The following amount of amenity space would need to be provided:

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

73. All flats, including the studio unit, have been provided with private amenity space, which is a positive benefit of the scheme. In terms of the three and four bed flats, most would contain at least 10sqm of private amenity space, however three three-bed flats fall marginally short providing 9.6sqm, 9.8sqm and 9.9sqm respectively. This does not raise any significant concern owing to the provision of the communal amenity space at roof level, as discussed below at paragraph 74.

74. The two bed flats are all provided with private amenity space, and in some cases, the amount provided exceeds 10sqm.

Communal amenity space

75. Where the full recommended provision of 10sqm per residential unit has not been provided, the shortfall has been added to the communal requirement. In this case, a total of 35.5sqm of communal space would need to be found. Combined with the 50sqm required per block, a total of 85.5sqm of communal amenity space would be required. In total, 278sqm of communal amenity space would be provided at roof level. This 278sqm provided considerably exceeds the minimum policy expectation of 85.5sqm. The level of overall communal space would exceed the minimum required by 192.5sqm which is a further benefit of the scheme.

Children's amenity space

76. Children's' play space requirements are set out in the Greater London Authority's 'Shaping Neighbourhoods: Play and informal recreation SPG. The SPG requires the provision of 10sqm of playspace for every child space in the development, which would result in the requirement for 152sqm of playspace. The plans show the provision of two separate play areas on the roof, totalling 24sqm. The amount of playspace provided therefore falls considerably short of the 152sqm required, by 128sqm. However given the 192.5sqm over provision of communal amenity space, it is recommended that sufficient space is available to provide for good quality children's play.

Conclusion on quality of accommodation

77. Overall, the quality of the accommodation is considered acceptable. There are issues such as the minor shortfalls in three bed private amenity space provision, the

overlooking standards and the level of true dual aspect provision. However, the provision of private amenity spaces for each flat, internal storage and roof level communal amenity space are considered positive factors sufficient to outweigh these shortfalls. On this basis, it is considered that, on balance, the quality of accommodation provided justifies the density of the development and would provide an attractive living environment.

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

Daylight

78. A daylight and sunlight report has been submitted as part of the application, based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
79. The BRE sets out three detailed daylight tests. The first is the vertical sky component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of their original value before the loss is noticeable.
80. 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 more than 20% in the area of sky visibility, daylight may be affected.
81. Another method of calculation is the average daylight factor (ADF) which is a more detailed assessment and considers the amount of sky visibility on the vertical face of a window, but also the window size, room size and room use. The recommendations for ADF in dwellings are 2% for kitchens, 1.5% for living rooms and 1% for bedrooms. The BRE recommends that whilst ADF is an appropriate measure for new buildings and master planned areas, VSC/NSL should be principally used to assess impact on existing buildings.

Sunlight

82. The BRE guide states that if a window can receive 25% of the available annual sunlight, including at least 5% of winter sunlight between the hours of 21 September and 21 March, then the room would be adequately sunlight. Only windows that are orientated to face within 90 degrees of due south need to be considered.
83. The submitted report has taken into account the daylight and sunlight impacts for the following buildings:
 - 1-18 Ripley House, Rushworth Street
 - Chadwick House, Rushworth Street
 - Waterloo Mansions, 59 Webber Street
 - 10-13 Rushworth Street
 - 40 Rushworth Street
 - 1-18 Merrow Buildings, King's Bench Street

- 59A Webber Street
 - Friars Primary School, Webber Street
 - Manna Ash House, Pocock Street.
84. The remaining surrounding properties are either too far away to be affected by the proposed development or are in commercial use.
85. The site is situated in a dense urban location. As mentioned earlier in the report, it is occupied by two buildings in commercial use, both of which are two storeys in height. The buildings are low rise relative to their immediate context, including the recently constructed development at 10-13 Rushworth Street at five storeys. A gap also exists between the two buildings, and this gap in the building line is uncharacteristic of the street and the immediate context. Accordingly, the existing light levels enjoyed by the residential properties which directly overlook the site, such as Ripley House, Chadwick House and Waterloo Mansions are relatively high for an urban location of this type and consequently reductions in daylight and sunlight to neighbouring properties will occur if the site is redeveloped to a scale that is more consistent with other building heights on the street. The impact of these factors is considered in the assessment below.

1-18 Ripley House, Rushworth Street

86. This property is located on the eastern side of Rushworth Street, directly opposite the site. It contains residential accommodation from ground to third floor level. The floor plans for the building show that the living rooms in each of the flats face away from the site and the rooms facing the site are a mix of bedrooms, bathrooms and small kitchens. The plans also make clear that the bedrooms at ground floor level are served by two windows. The bathrooms have frosted glazing across the windows and since they are not habitable space, have not been included in the submitted daylight assessment. The kitchens are relatively small, comprising galley type rooms with floor areas that are less than 7.5sqm.
87. The building enjoys an open outlook due to the relatively low scale massing of the existing buildings and the servicing area creating a gap in the middle. The detailed VSC analysis shows that Ripley House will experience reductions in the levels of VSC of up to 50% VSC with the resultant values of between 5% and 25%. The level of loss is significantly beyond that recommended by the BRE guidelines and all 33 windows that face the site (counted to exclude bathrooms) would experience losses. The results of the other two methods of assessment, NSL and ADF also show large reductions.
88. In order to help understand and justify the level of loss, the applicant has prepared a “mirror image” assessment, to demonstrate what effects a building on the application site with a massing of equal height to Ripley House (11m) would have on the existing windows opposite the site. Even with an identical height and massing to that of Ripley House, reductions of up to 44% would be incurred to the ground floor of Ripley House, with retained values of typically 15.5% VSC, well below the target BRE recommendation of 27%.
89. The BRE, in the guidance, recognises that *“in a historic city centre, or in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings”*. If a new building is to match the height of the existing buildings which surround the site here, the mirror analysis demonstrates that a reduction in VSC of 44% could be expected, with a retained VSC value of around 15.5%.

90. The detailed daylight analysis of the impacts of the proposed development upon Ripley House demonstrates that the impacts would exceed those of the “mirror image” assessment. However, the differences between the two assessments are relatively small, with losses of up to 50% under the proposed scheme, and 44% with the mirror image assessment. Therefore whilst the proposed building is two storeys higher than Ripley House, it is considered that the additional impact of the set back top two floors would not be significant.
91. The affected rooms are understood to be bedrooms and kitchens, and are not the primary habitable accommodation within the flats. In addition, and as referred to above in paragraph 8, the scheme has been amended during the course of the application to slightly reduce the level of impact to Ripley House, through the lowering of parapet levels and set back of the front building line to slightly increase the distance to Ripley House. The mirror image analysis makes clear that the greatest level of obstruction is not from the two top storeys, but from redeveloping the site up to height to match Ripley House. Accordingly, given these specific factors, it is recognised that a form of development that is consistent with that of others on the street, would have a noticeable impact upon the property. Regard has been attached to the amendments made to the parapet levels and the building line. Accordingly, the level of impact is considered justified given the benefits arising from the redevelopment of the site.
92. The sunlight analysis shows that the vast majority of rooms in the Ripley building would meet the BRE recommendations, the few that do not retain in excess of 19% total sunlight, just falling short of the 25% recommendation. Given that the BRE stipulates that bedrooms and kitchens should be considered as less sensitive, the impact to these few rooms is considered acceptable.

Chadwick House, Rushworth Street

93. This property is located to the north-east of the site, on the opposite side of Rushworth Street and has residential windows at lower ground to second floor level. The property has a partial outlook over the site, towards the existing two storey buildings.
94. The results of the VSC analysis show that 15 windows in this block would experience reductions in VSC of between 20% and 34%. The affected windows are at lower ground, ground, first and second floor levels and serve bedrooms. The resultant VSC values would be low, specifically between 12% and 27%.
95. When the NSL assessment is taken into account, all but two of the windows meet the BRE guidelines recommendations. The two affected windows under this assessment are bedrooms at lower ground floor level with losses of 21% and 46% respectively.
96. The results of the remaining daylight test, namely ADF, show full compliance with the BRE guidance, with all of the rooms meeting the ADF requirement for their room use.
97. Chadwick House is located immediately next to Ripley House, and accordingly, similar arguments in relation to the “mirror image” analysis apply in relation to the similarity in the extent of reductions from that analysis and the proposed building.
98. The sunlight analysis shows that all but three rooms would meet the BRE guideline recommendations. Two of the rooms that fall short are the same lower ground floor bedroom windows referenced above with an additional bedroom at ground floor level.

The results show that these windows would receive winter sun between 1% and 4% - falling below the recommended 5% and total sunlight of between 16% and 24% - falling below the recommended 25%. The BRE guidelines suggest their target values based on living rooms, and so the retained levels in these bedrooms are considered to be adequate for bedrooms in an urban setting.

99. It is therefore considered that the daylight and sunlight impacts to this building are acceptable.

Waterloo Mansions, 59 Webber Street

100. This property is located to the south-west of the site, fronting Webber Street and contains residential accommodation across four floors. The building has a number of balconies overhanging the windows overlooking the application site. The floorplans indicate that the overhung windows are living rooms and in one instance a kitchen. The BRE guidelines recognise that windows below a balcony typically receive less daylight as the balcony cuts out light from the top part of the sky. The BRE guidelines also suggest that it is appropriate to carry out an additional calculation of the VSC without the balcony in place in order to understand the true impact of the development. Accordingly, the submitted assessment has included results with the balcony in place, and with the balcony removed.
101. The massing of the proposed development has been revised in response to daylight concerns raised by neighbours and officers. A setback has been incorporated at fourth floor level on the southern end of the proposed development to allow some additional daylight to the windows in Waterloo Mansions. This set back has meant that the daylight losses are not as significant as they were in the original scheme, but nonetheless still show some areas of non compliance as discussed below.
102. Of the 41 windows tested, 18 windows would experience losses in VSC of greater than 20%. The losses range from 20% to 38% and would result in retained VSC values of between 5% and 27%. The worst affected windows are those immediately below the balconies at ground, first and second floor levels. The NSL and ADF methods also show significant losses. The analysis undertaken without the balconies in place shows a greater level of compliance, with the worst affected window experiencing a 26% VSC reduction, which, whilst still failing short, comes closer to guideline recommendations, and is considered reasonable taking into account the urban context.
103. An additional analysis has been undertaken to identify the cumulative daylight and sunlight effect to Waterloo Mansions that would occur if the adjacent development currently proposed at 61 Webber Street & 24-28 Rushworth Street (ref 15/AP/2705) were to be implemented and built out. The results show very little difference with this additional development factored in. A very marginal increase in daylight would occur to Waterloo Mansions, but generally the main conclusions reached would be similar and as reported above.
104. All of the windows and rooms within this property that are relevant for sunlight analysis meet the BRE guideline recommendations. Therefore the sunlight effect of the development would be acceptable.

10-13 Rushworth Street

105. This property is located immediately adjacent to the site and has windows facing in a north-east and south-west direction with a very oblique view of the proposed development.
106. All of the windows in this property with the exception of two would meet the BRE recommendations in respect of the VSC levels. The two that do not meet the target values are secondary side windows for a living/kitchen rooms which have other windows, all of which meet the recommendations. In addition, all of the rooms also meet the NSL analysis. The rooms have been tested for sunlight, which also show compliance with the BRE recommendations.
107. An objection has been received from the occupiers of this property on the basis that there was no consideration in the submitted daylight and sunlight report of the sunlight impact on the four roof terraces within the development. An analysis has now been carried out, demonstrating the sunlight availability to the terraces on 21 March, both in the existing and proposed situations. The analysis of the existing condition shows that all four terraces would record less than the recommended 50% area receiving at least 2 hours of sunlight without the development in place, with 18.7%, 32.9%, 45.5% and 49.7% recorded. With the development in place, only one roof terrace would experience any loss in sunlight availability; this is a southern terrace at the rear of the development where the analysis reflects that the amount of terrace receiving two hours of sunlight would be reduced from 49.7%, to 27%. The extent of sunlight loss to this terrace would therefore be noticeable however the area of the terrace enjoying the sun at table height, rather than at ground level, would be larger, at 84.5%.

40 Rushworth Street

108. 40 Rushworth Street is a development currently under construction and includes residential development at second floor level and above. It is located on the opposite side of Rushworth Street, to the south east. The results of the daylight and sunlight analysis show that all of the rooms would continue to meet the BRE recommendations for daylight and sunlight with the development in place. The impacts on this building would therefore be acceptable.

1-18 Merrow House, King's Bench Street

109. Merrow House is a residential building located to the rear of Ripley House but has a partial view of the proposed development on the upper floors and at the south-eastern end of the property, where windows look through the gap between Ripley House and 33-38 Rushworth Street.
110. All of the windows in this property meet the BRE guideline recommendations in respect of the VSC and ADF method. The NSL form of analysis shows that all but one of the rooms would meet the BRE recommendations, the exception being a living room on the ground floor which has a reduction of 22%, and accordingly only falls marginally short, and accordingly does not raise any concern.
111. In relation to sunlight, all of the windows meet the BRE recommendations for sunlight assessment and therefore the impacts would be acceptable.

59A Webber Street

112. This property is located to the south west of the site and is currently in use as accommodation for the caretaker for the school. The analysis shows that all of the windows and rooms would meet the BRE guideline recommendations both for daylight and sunlight. The impact upon this building is therefore acceptable.

Friars Primary School, Webber Street

113. This property is located to the immediate west of the site and has been assessed for daylight and sunlight due to the use of the facility for educational purposes and the reasonable expectation of daylight and sunlight amenity.

114. The majority of the windows would meet the BRE recommendations in respect of VSC. 5 out of the 21 windows tested however would experience reductions but the extent of loss is considered marginal ranging from 20% to 26% and so just slightly beyond the 20% tolerance recommended. The NSL and ADF methods both show compliance. The sunlight analysis also shows full compliance, with all rooms retaining levels of sunlight in excess of the BRE recommendations. The impacts to this property are therefore acceptable.

Manna Ash House, Pocock Street

115. This property is located to the north west of the site and contains residential accommodation with a partial view of the proposed development. All of the windows in the property would retain levels of daylight and sunlight that are well above the BRE recommendations. The impacts to this property are therefore acceptable.

Conclusion on daylight and sunlight

116. The results of the daylight assessment reveal that there would be a number of rooms that would not meet the relevant daylighting standards of the BRE, with flats at Ripley House, Chadwick House and Waterloo Mansions particularly affected. The site is occupied by two storey buildings which are low rise in comparison to the heights of the immediate surrounding context, and also provide for a gap in between the buildings which is uncharacteristic of the area generally. Accordingly, the surrounding properties do currently experience higher levels of daylight for the urban location. The "mirror analysis" undertaken demonstrates that even if a building of a height identical to that of Ripley House was proposed, it would still give rise to significant levels of daylight loss. As discussed elsewhere in the report, the height of the development is considered acceptable and is of an appropriate massing in the streetscape. Rushworth Street is also a fairly narrow street, which has also had an impact on the extent of daylight loss. The scheme was amended during the course of the application in order to mitigate its impacts, by slightly setting back the main building line and reducing the height of the parapet wall; this has led to some improvements to the impact on Ripley and Chadwick Houses and also Waterloo Mansions. In addition, there should be some acknowledgement that the site is in a central London location and accordingly the standards should be applied with some degree of flexibility taking into account the material considerations as described. Accordingly, taking these factors into account, the impacts to the surrounding occupiers on daylight and sunlight are considered acceptable.

Overlooking/outlook

117. 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.
118. Across Rushworth Street, there would be a distance of 10m to Ripley and Chadwick House, which falls 2m short of the expected 12m at the front of the building. Rushworth Street is a fairly narrow street, and building line of the proposed development is consistent with buildings either side of it. Accordingly, the distance to the facing windows is acceptable, taking into account the specific context of the street. To the south-west, there would be an approximate 11m distance to Waterloo Mansions at 59 Webber Street, falling short of the required 21m. However the windows on the proposed development would not directly look onto the mansion block, being orientated such that would face predominantly west rather than south west. Accordingly, it is not considered that the proposed development would give rise to any harmful impacts by way of loss of privacy. To the west, there would be almost 25m to the Friars Primary School, achieving compliance. The building does overlook the school playground, but this relationship is not unusual in central London locations. There are no directly facing windows to the north, but some balconies belonging to the 10-13 Rushworth Street development do exist on the shared boundary; however it is not felt that there would be significant overlooking here. In conclusion, whilst the overlooking standards to Ripley House, Chadwick House and Waterloo Mansions would not be achieved, factors such as the narrow street width and orientation of the windows would make the development acceptable in this regard.

Noise

119. The noise impacts from the site would be highest during the demolition of the existing buildings, the basement excavation and substructure works. Traffic noise from construction would increase noise levels, however these impacts would be short term in nature. When considering the existing (light industrial) warehouse, the proposed development could be considered as a less noisy form of development, although it is accepted that there would be more comings and goings during evenings and weekends because of the increase in workers and residents. However it is unlikely that there would be any demonstrable harm caused to residential amenities from the increased movement. A neighbour has raised concern about the noise impact from the office courtyard; however, this space is fairly small and would be ancillary to the office use. It would be unlikely to cause any disturbance, particularly being located at basement level. A condition will be attached to the recommendation to ensure that noise from plant and machinery would fall below background noise levels and therefore would protect residential amenities. Conditions are also recommended in relation to construction management and servicing and delivery hours for the office use.

Transport issues

120. 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

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

Servicing and Waste Management

122. Servicing and refuse collection is proposed directly from Rushworth Street, from a new on street service bay. This is acceptable given the low number of likely deliveries and since servicing within the curtilage of the site may not be able to accommodate larger service vehicles. Refuse storage is provided at basement level.

Car parking

123. Saved Policy 5.6 (Car Parking) of the Southwark Plan and Core Strategy Policy 2 (Sustainable Transport) state that residential developments should be car free. The scheme does not include any general needs parking spaces, and provides only two accessible spaces within the ground floor of the development, accessed from Rushworth Street. Whilst the number of spaces proposed (2) does not equate to the number of disabled units (5), the council's transport group have not raised any concern since the site is located within a highly accessible location with step free access to buses and local train and tube stations. Layout and tracking plans have been provided which show that vehicles as well as the driver and passenger could enter and exit the accessible spaces satisfactorily. Conditions are recommended preventing future occupiers from being able to obtain parking permits and to secure the implementation of a travel plan.

Cycling

124. 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 to the Cycle Super Highway on Southwark Bridge to the east.
125. A total of 114 cycle parking spaces would be provided, 94 for the residential and 20 for the offices. The level of provision is considered acceptable, and has been increased during the course of the application to reflect Transport for London's comments. The office and residential cycle parking would be provided at basement level and would comprise pod stands, each stand holding 2 cycles. The council's transport team have advised that the pods would be acceptable, subject to receiving revised details regarding the dimensions and spacing to ensure there is sufficient space for the cycle to access the stand. These details can be secured by condition.

Car clubs

126. There are three car club bays located within close proximity of the site. Car club membership for three years should be secured by the legal agreement.

Flood risk

127. The site is located in Flood Zone 3 which is defined as having a 'high probability' of river and sea flooding and accordingly the applicant has submitted a Flood Risk Assessment. The Environment Agency noted some of the information included in the assessment namely the information on modelled flood extents has been superseded, but have adopted a pragmatic approach and have not objected since they consider that an updated assessment would not impact on their recommendation. Accordingly they have not objected but have recommended the attachment of conditions, with some conditions, namely contamination and surface water drainage already requested by the council's environmental protection and flood drainage teams.
128. The council's flood and drainage team have requested that a basement impact assessment be undertaken to consider the effects of the basement on ground water levels and flows. The preparation of this assessment is underway at the time of writing, and it is recommended that a condition is imposed to ensure that the recommendations of the assessment are secured in the scheme.

Planning obligations (S.106 undertaking or agreement)

129. Saved policy 2.5 'Planning obligations' of the Southwark Plan and policy 8.2 of the London Plan advise that Local Planning Authorities should seek to enter into planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Further information is contained within the Council's adopted Planning Obligations and Community Infrastructure Levy SPD. A s106 agreement is currently being drafted which should include clauses to secure the following:
- the provision of affordable housing
 - car club membership for three years
 - site specific highway works involving the repaving of the Rushworth Street footway, reinstatement of redundant vehicle crossings and formation of new
 - employment and training provisions during construction and in the completed development.
130. In the event that a satisfactory legal agreement has not been entered into by 30 June 2016 it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:

The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions in accordance with saved policy 2.5 'Planning Obligations' of the Southwark Plan (2007), strategic policy 14 'Delivery and Implementation' of the Core Strategy (2011), policy 8.2 'Planning obligations' of the London Plan (2015) and the Planning Obligations and Community Infrastructure Levy SPD (2015).

Development viability

131. Southwark's Development Viability SPD requires a financial viability appraisal to be submitted for all planning applications which trigger a requirement to provide affordable

housing, or otherwise rely upon development viability to justify compliance with planning policy requirements. The financial viability appraisal should provide a robust assessment of the viability of a proposed scheme which identifies the maximum level of affordable housing that can be sustained and justifies any proposed departures from planning policy requirements.

132. If the SPD is adopted by Cabinet on 15 March 2016 the SPD will be a consideration of significant weight as an adopted SPD. This application was accompanied by Viability report on submission. Following negotiations, the application was amended to include a policy compliant level of affordable housing. In line with the requirements of the emerging SPD, this revised offer is supported by an updated viability appraisal which explains the basis on which the improved offer can be supported within a scheme which remains deliverable. Although this updated report is in summary form (rather than a complete new appraisal) it does support the applicants assertion that they could deliver the scheme taking into account the costs and potential revenues set out in the summary appraisal.
133. The report recommends that permission be granted subject to a s106 agreement, and that the agreement should require that any subsequent renegotiation of affordable housing which represents a net reduction (for instance through an appeal) will be subject to a viability review following substantial implementation.

Sustainable development implications

Carbon emissions and renewable technologies

134. London Plan Policy 5.2 requires a reduction in carbon emissions of 35% below Part L 2013 target. A detailed energy assessment has been submitted as part of the application to demonstrate how the targets for carbon dioxide emissions reduction are to be met. Overall, the development would achieve a carbon saving of 35%, complying with the policy requirement. This has been achieved using passive measures, energy efficiency measures and a CHP plant. A 20% renewable energy contribution is proposed with the use of aero-thermal heat pumps to provide heating and cooling to the offices as well as photovoltaic panels to the roof area. The energy strategy is therefore acceptable and it is recommended that a condition be imposed to secure the details for the development.

BREEAM

135. The offices are predicted to achieve a BREEAM rating of "Excellent" which meets the standard required by Core Strategy Policy 13 High Environmental Standards. It is recommended that a post construction review be submitted by condition to confirm that the standard has been met.

Green roofs

136. The roof of the development would be used to provide communal amenity space for the development including photovoltaic panels. On parts of the roof not used for these purposes, green roofs are to be installed which is welcomed. A condition will be attached requiring further details of the exact parts of the roof, including section and planting details. A condition should also be attached requiring the installation of nest boxes.

Mayoral and Southwark Community Infrastructure Levy (CIL)

137. Section 143 of the Localism Act states that any financial contribution received in terms of community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure that supports growth in Southwark.
138. In this instance a Mayoral CIL payment of £246,754 and a Southwark CIL payment of £809,722 are due.

Other matters

139. An objection has been received from a neighbour raising concern about the impact on property value. This is not a material planning matter and therefore has not been considered as part of the assessment.

Statement of community involvement

140. 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.
141. A statement of community involvement has been submitted with the application. The document has set out the pre-application consultation that has been carried out with local residents and businesses, local community groups such as the Bankside Residents Forum and Members of Southwark Council. In terms of the consultation carried out, a public exhibition took place on 18 and 20 July 2015 at The Blackfriars Settlement. The exhibition was publicised through the sending of letters to local residents and businesses. A public drop in session was also held, again at The Blackfriars Settlement, on 15 September 2015. One to one meetings with interested parties also took place.
142. The main issues raised during the pre-application consultation were concerns about the building height and massing and the delivery of affordable housing. The submitted statement has summarised the responses received and how it has responded to the issues and concerns raised. Revisions were made to the scheme by reducing the massing of the top floors and pulling the building away from the rear boundary. Affordable housing is proposed on the site.

Conclusion on planning issues

143. The redevelopment of the site is supported and welcomed in principle. The principle of providing housing on the site is accepted, and would be in line with policy aspirations to increase the number of new housing units in the area. The office floorspace more than replaces the existing employment space on the site, which accords with relevant policies, and the design and layout of the space offers flexibility for future occupiers and would significantly increase the number of jobs the site could support. This is a very positive aspect of the proposal.

144. The proposal would be of a high quality design and of an appropriate height and massing. It would preserve the setting of the adjoining Kings Bench Conservation Area and the listed buildings of Ripley House and Chadwick House.
145. Overall, the proposal would provide a good standard of accommodation, justifying the density. The housing mix, whilst falling slightly short of 3 bed family units, is considered acceptable owing to the provision of a larger proportion of social rented 3 and 4 bed family units. The level of wheelchair housing would be in accordance with relevant policies. It would deliver a policy compliant level of affordable housing which is a further significant benefit.
146. The impacts of the scheme in relation to daylight and sunlight are on balance considered acceptable and whilst there would be departures from the BRE guidelines, other factors such as the mirror analysis, the scale of the surrounding buildings as well as the central London environment should be given weight.
147. It is therefore recommended that permission be granted, subject to conditions as set out in the attached draft decision notice and the completion of a s106 legal agreement on terms as set out above.

Community impact statement

148. 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) The following issues relevant to particular communities/groups likely to be affected have been identified above.
 - c) The likely adverse or less good implications for any particular communities/groups have been also been discussed above.

Consultations

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

Consultation replies

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

Summary of consultation responses

151. 10 neighbours have objected to the scheme, raising the following matters:

- Concern in relation to the loss of the industrial uses
- The building is much higher than the existing and should be reduced to that of Ripley and Merrow House opposite (i.e. no more than 4 storeys) so as to respect the listed buildings and the Kings Bench Conservation Area
- The building has an unattractive appearance

- Impacts on daylight and sunlight (from residents at Ripley House and 59 Webber Street)
- Impact on the balconies at the recently constructed development at 10-13 Rushworth Street – overlooking and daylight/sunlight impacts
- A building of six storeys high was not accepted at 10-13 Rushworth Street, where a development of 5 storeys was consented and built, and accordingly should not be accepted here
- Overlooking and loss of privacy (to flats in 59 Webber Street)
- Increase in noise and traffic congestion during evenings and weekends; including noise from the open office courtyards
- Impact on property value.

External consultees

152. Metropolitan Police

Request that a condition is attached requiring the development achieves Secured by Design accreditation.

153. Thames Water

No objection in relation to sewerage infrastructure capacity. Request that a piling method statement is attached by condition.

154. Transport for London

Comments made. The development proposed is to be car free which is supported by TfL given the high PTAL level of 6b measured on a scale of 1a – 6b where 6b is the highest.

155. The development proposes two Blue Badge car parking spaces on site, the London Plan (2015) standard is provision equivalent to 10% of the units (i.e. for all accessible homes) therefore TfL requests the provision is increased to reflect this. Residents should also be exempt from applying for parking permits and this should be secured as part of the S106 agreement. Electric Vehicle Charging Points (EVCPs) must be provided in accordance with London Plan standards.

156. The development proposes 75 cycle parking spaces; 9 for the office use and 66 for the residential use. This provision is well below the London Plan (2015) minimum standards, the applicant should base the cycle provision on the gross external area (square metres) for each proposed use as set out in London Plan Policy 6.9. Detail should be provided on the number of spaces allocated to long stay and short stay provision for each use, it is preferable that short stay cycle spaces are easily accessible to visitors.

(Concerns about cycle parking provision have been addressed as noted in the section on cycling above in the report)

157. As the development proposes 54 residential units a Travel Planning Statement will need to be submitted in accordance with TfL guidance, which can be found at this link:

<https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans/planning-requirements>

It should be secured by condition or as part of the S106 agreement.

158. A Delivery and Servicing Plan (DSP) and Construction Logistics Plans (CLP) prepared in accordance with TfL guidance and in line with London Plan Policy 6.3, should be submitted and secured by condition or as part of the S106 agreement.

159. In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. All new developments that create 100 square metres or more of additional floor space are liable to pay the Mayoral CIL. The levy is charged at £35 per square metre of additional floor space in the Southwark Council.

160. The site is also in the area where S106 contributions for Crossrail will be sought (where appropriate) in accordance with London Plan Policy 6.5 and the associated Supplementary Planning Guidance (SPG) 'Use of planning obligations in the funding of Crossrail' (April 2013).

161. Environment Agency

No objection subject to conditions. Note that some of the flooding information within the submitted flood risk assessment namely the information obtained from the Environment Agency relating to modelled flood extents (sections 1.0 and 5.5, Figure 5.5.1, Table 5.5 and so on) has been superseded, because our tidal River Thames flood modelling has been updated – to take account of the Thames Estuary (TE2100) project – since the information was obtained. Accordingly it may be prudent for the applicant to re-assess the development proposals with respect to the updated modelled flood extents and levels, in order to ensure that the 'best available' flooding information has been considered. However, we are adopting a pragmatic approach here and not objecting to the application since the production of an updated Flood Risk Assessment would not materially alter our stance on the proposed development. Recommend the attachment of conditions.

162. Historic England

The application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

Internal consultees

163. Flood and Drainage Team

Comments made. A basement impact assessment should be undertaken to consider the effects of the basement on ground water levels and flows. Section 8.4 of the Flood Risk Assessment states that "this report considers that surface water storage will be required below the lower ground floor level and will then be pumped back up to the receiving systems." Southwark prefer non-pumped systems wherever possible. Every effort should be made to develop a gravity system for this development, which attenuates as much of the runoff as possible. The drainage for the site has not been suitably developed. In general, Southwark now expect that every effort is made to reduce runoff from all developments to equivalent greenfield rates. The Flood Risk Assessment (FRA) does suggest that the site runoff should be limited to 11 l/s (53% reduction in flowrate). However, details of the equivalent greenfield runoff rate should be provided in order to assess whether such a reduction is feasible. As the drainage systems for this site have not yet been developed, we would recommend a condition is

imposed to require a surface water drainage strategy to be submitted.

164. Highways Development

Comments made. Visibility splays for the two off street disabled parking spaces should be provided. A service management plan should be requested. The footway should be repaved, vehicle crossings should be reinstated and new crossovers constructed to relevant standards. A traffic management order to prevent occupiers from obtaining permits should be secured.

165. Urban Forester

Comments made. No trees or soft landscape exist on the site. The opportunity exists for suitable enhancement to soften the scheme and improve biodiversity. A landscape condition is appropriate given the lack of detail regarding suitable planting palette and planters.

166. Environmental protection

Recommend approval subject to conditions in relation to plant noise, internal ventilation, servicing hours, contamination and construction management.

167. Archaeology

No response is necessary for this application.

168. Transport Group

Comments made. The site is located within the north of the borough. The site is located in an area that benefits from a high PTAL (6a) within a CPZ and also located within the Central Activities Zone. A car free development with the exception of disabled parking would be expected.

169. The applicant has proposed to provide a car free development with the provision of one off street disabled parking space. All occupiers of the development should be prevented from applying for permits by condition.

170. There are three car club bays located in close proximity the property. The applicant will be required to provide a minimum of three years free membership for each eligible adult of the residential element of the scheme.

171. Disabled parking - From the plans provided the disabled spaces proposed does not appear to be workable, there does not appear to be enough space for either the driver or passenger to exit or enter the car comfortably. It is noted that the site is located within a high PTAL and therefore has a great accessibility level. As previously stated the site is located within a high PTAL and therefore a car free development would be expected, therefore should the applicant remove the proposed disabled bays Transport Policy would not object to this proposal. Should the applicant wish to keep the disabled bays the applicant will be required to provide adequate space to enable ease of access for the vehicle user.

172. Servicing - the applicant has proposed to provide servicing on street. Transport Policy do not support this proposal. The proposed application is for the demolition and erection of a new building and therefore it can not be argued that there are site

constraints. All new developments should provide off street servicing provision. All vehicles would be expected to enter and exit the site in a forward gear.

173. Cycle storage- It is unclear from the plans provided as to what cycle stands have been proposed. This will need to be addressed. The applicant should be made aware that cycle storage provisions should be in line with the New London Plan.
174. Construction Management Plans - Should the construction of a development require the occupation or closure of the carriageway or footway; involve a high volume of construction related vehicle trips; or any other significant impact on the highway network then a Construction Management Plan is required prior to any demolition or construction works on site.
175. In order to improve the safety of cyclists in the borough we require that all drivers of HGVs related to construction projects have completed an accredited Cyclist Awareness course in advance of (but no more than two years before) the start of works. This includes drivers employed by sub-contractors, and drivers engaged in any HGV activity serving the site, including waste collection. Records of drivers accessing the site will be held as a matter of course. This should be supplemented by records of each driver's training in this respect, and such records should be provided to the Council (transport@southwark.gov.uk) within one month of the start on site and made available to view on request thereafter.
176. The applicant will be required to address the above points prior to this application being determined.

Note: the plans were updated following receipt of these comments, and concerns have been addressed.

177. Design Review Panel

An earlier version of the scheme was presented to Design Review Panel in October 2015. In summary, the Panel did not feel that the site could accommodate such a dense approach and felt strongly that the quantum of both office and residential accommodation was unacceptable. They did not believe that the office space at lower ground floor level would receive adequate daylight or sunlight and queried the quality of the courtyard spaces proposed. The quality of the residential accommodation was queried in relation to the high proportion of single aspect units, long narrow rooms, 'slot windows being the only source of natural light for bedrooms, overlooking between bedrooms and poor quality amenity spaces. The Panel were unconvinced that the site could accommodate two storeys on top of the four storey shoulder height and considered that the building would considerably overshadow the street and the buildings opposite.

(The concerns raised by the Design Review Panel have been addressed as noted in the section on Quality of Accommodation above in the report)

178. Ecology

The development site is dominated by buildings and hard landscaping and currently has negligible interest for biodiversity. Welcome the roof terraces however they will provide limited value to biodiversity due to their inaccessibility by terrestrial wildlife. There could be biodiversity gain through installation of nest boxes and a bio-diverse

roof on the main building.

Re-consultation

179. Two objections received on the following grounds:

- Loss of commercial site
- The height and density of the proposed building is not appropriate for the area;
- Impacts on daylight and sunlight (from Ripley House resident)
- Loss of privacy (to flats in 59 Webber Street)
- Increase in noise and traffic congestion
- The building would be overbearing to Ripley and Merrow House.

Human rights implications

180. 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.

181. This application has the legitimate aim of providing a redevelopment of the site with office and residential floorspace. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1445-33 Application file: 15/AP/4000 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 5513 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation
Appendix 4	Computer generated images

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Kiran Chauhan, Senior Planning Officer	
Version	Final	
Dated	10 March 2016	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic director, finance and governance	No	No
Strategic director, environment and leisure	No	No
Strategic director, housing and modernisation	No	No
Director of regeneration	No	No
Date final report sent to Constitutional Team		10 March 2016

APPENDIX 1

Consultation undertaken

Site notice date: 14/10/2015

Press notice date: 15/10/2015

Case officer site visit date: 14/10/2015

Neighbour consultation letters sent: 09/10/2015

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

EDF Energy
Environment Agency
Historic England
London Fire & Emergency Planning Authority
Metropolitan Police Service (Designing out Crime)
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

St Alphege Church Kings Bench Street SE1 0QX
50 Rushworth Street London SE1 0RB
20 Waterloo Mansions 59 Webber Street SE1 0RD
Flat 20 59 Webber Street SE1 0RD
Flat 21 59 Webber Street SE1 0RD
Unit 15 33 Rushworth Street SE1 0RB
Unit 16 33 Rushworth Street SE1 0RB
Unit 14 33 Rushworth Street SE1 0RB
15-16 Rushworth Street London SE1 0RB
21 Rushworth Street London SE1 0RB
Flat 19 59 Webber Street SE1 0RD
Flat 12 59 Webber Street SE1 0RD
Flat 12a 59 Webber Street SE1 0RD
Flat 11 59 Webber Street SE1 0RD
Flat 9 59 Webber Street SE1 0RD
Flat 10 59 Webber Street SE1 0RD
Flat 17 59 Webber Street SE1 0RD
Flat 18 59 Webber Street SE1 0RD
Flat 16 59 Webber Street SE1 0RD

9 Rushworth Street London SE1 0RB
Flat 3 Ripley House SE1 0RA
Flat 4 Ripley House SE1 0RA
Flat 2 Ripley House SE1 0RA
Flat 11 Ripley House SE1 0RA
Flat 12 Ripley House SE1 0RA
18-19 Rushworth Street London SE1 0RB
Unit 13 33 Rushworth Street SE1 0RB
Unit 19 33 Rushworth Street SE1 0RB
Unit 10 33 Rushworth Street SE1 0RB
7a Kings Bench Street London SE1 0QX
7b Kings Bench Street London SE1 0QX
Flat 14 59 Webber Street SE1 0RD
Church Hall St Alphege Church SE1 0QX
Unit 24 33 Rushworth Street SE1 0RB
Unit 20 33 Rushworth Street SE1 0RB
Unit 22 33 Rushworth Street SE1 0RB
Flat 2 59 Webber Street SE1 0RD
Flat 3 59 Webber Street SE1 0RD

Flat 12b 59 Webber Street SE1 0RD
Flat 15 59 Webber Street SE1 0RD
Ground Floor 61 Webber Street SE1 0RF
First Floor 61 Webber Street SE1 0RF
37 Rushworth Street London SE1 0RB
Second Floor 24-28 Rushworth Street SE1 0RB
Third Floor 24-28 Rushworth Street SE1 0RB
Second Floor 61 Webber Street SE1 0RF
Rushworth And Friars Primary School Webber Street SE1 0RF
First Floor 24-28 Rushworth Street SE1 0RB
14 Rushworth Street London SE1 0RB
Unit 21 33 Rushworth Street SE1 0RB
Unit 23 33 Rushworth Street SE1 0RB
17 Rushworth Street London SE1 0RB
Unit 8 33 Rushworth Street SE1 0RB
The Convent 48 Rushworth Street SE1 0RB
Ground Floor 24-28 Rushworth Street SE1 0RB
59a Webber Street London SE1 0RF
20 Rushworth Street London SE1 0RB
33 Rushworth Street London SE1 0RB
Flat 1 Ripley House SE1 0RA
Flat 10 Ripley House SE1 0RA
5 Kings Bench Street London SE1 0QX

Flat 1 59 Webber Street SE1 0RD
Unit 7 33 Rushworth Street SE1 0RB
35-37 Rushworth Street London SE1 0RB
Flat 7 59 Webber Street SE1 0RD
Flat 8 59 Webber Street SE1 0RD
Flat 6 59 Webber Street SE1 0RD
Flat 4 59 Webber Street SE1 0RD
Flat 5 59 Webber Street SE1 0RD
Unit 11 33 Rushworth Street SE1 0RB
Flat 8 Ripley House SE1 0RA
Flat 9 Ripley House SE1 0RA
Flat 7 Ripley House SE1 0RA
Flat 5 Ripley House SE1 0RA
Flat 6 Ripley House SE1 0RA
1-3 Kings Bench Street London SE1 0QX
Unit 17 33 Rushworth Street SE1 0RB
Unit 12 33 Rushworth Street SE1 0RB
Friars Primary School Webber Street SE1 0RF
Unit 9 33 Rushworth Street SE1 0RB
8 Ripley House Rushworth Street SE1 0RA
Flat 10 Bench Apartments 22 Kings Bench Street SE1 0QZ
Flat 10 22 Kings Bench St SE10QX
Rushworth Street Ltd
Chartered Building Surveyors Enterprise House NW4 2HN

Re-consultation: 24/02/2016

APPENDIX 2

Consultation responses received

Internal services

Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]
Flood and Drainage Team

Statutory and non-statutory organisations

Environment Agency
Historic England
Metropolitan Police Service (Designing out Crime)
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbours and local groups

Chartered Building Surveyors Enterprise House NW4 2HN
Email representation
Flat 10 Bench Apartments 22 Kings Bench Street SE1 0QZ
Flat 12b 59 Webber Street SE1 0RD
Flat 16 59 Webber Street SE1 0RD
Flat 3 59 Webber Street SE1 0RD
Flat 5 59 Webber Street SE1 0RD
Flat 8 59 Webber Street SE1 0RD
20 Waterloo Mansions 59 Webber Street SE1 0RD
8 Ripley House Rushworth Street SE1 0RA