Item No. 5.3	Classification: Open	Date: 12 July 2016	Meeting Name: Planning Committee		
Report title:	Development Management planning application: Application 16/AP/1660 for: Full Planning Permission				
	Address: FRIARS BRIDGE COURT, 41 - 45 BLACKFRIARS ROAD, LONDON 8NZ				
Proposal: Demolition of existing office building (Class B1a) and redeve provide a part 13, part 22 storey building plus basement compri (Class B1a) with retail (Classes A1/A3 and A4) together with cycle parking and landscaping					
Ward(s) or groups affected:	Cathedrals				
From:	Director of Planning				
Application Start Date 27/04/2016 PPA Date 31/10/2016					
Earliest Decision Date 22/06/2016					

RECOMMENDATIONS

- 1. a) That the planning committee grant planning permission subject to conditions and referral to the Mayor of London, and the applicant entering into an appropriate legal agreement by no later than 31 October 2016.
 - b) That in the event that the requirements of (a) are not met by 31 October 2016, the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 96 of the report.

BACKGROUND INFORMATION

Site location and description

- 2. The application site refers to the building and plot located at 41 45 Blackfriars Road. The site has an area of 0.16 hectares and is occupied by a nine storey building known as Friars Bridge Court which provides 12,840sqm (GIA) of Class B1 office floorspace. The building has frontages onto Blackfriars Road to the east, Meymott Street to the south and Colombo Street to the west. The northern boundary of the site abuts the Colombo Centre (sports and community centre) and the recently approved Wedge House development at 32 - 40 Blackfriars Road which is under construction.
- 3. The wider area is characterised by a mix of uses including offices, residential, hotels, commercial use and student accommodation. The site itself is immediately bordered by a hotel, a doctor's surgery, a sports/community centre and a recently approved office and hotel development. Building heights vary with the neighbouring Wedge House development reaching 14 storeys and heights stepping down westwards towards Waterloo and stepping up significantly northwards towards the tall buildings cluster at the junction of Blackfriars Road and Stamford Street.

Details of proposal

4. Planning permission is sought for the demolition of the existing office building in order to redevelop the site to provide a part 13, part 22 storey building with basement comprising 26,637 sqm (GIA) of Class B1 office floorspace and 986sqm (GIA) of Class A1/A3/A4 retail floorspace, together with servicing, cycle parking (414 spaces) and landscaping within a new public realm to the rear of the site.

5. Planning history

91/AP/0170 Application type: Full Planning Permission (FUL) Change of use of eight residential units at upper ground and first floor levels to B1 business purposes and use of nine residentially allocated basement car parking spaces for offices.

Decision date 09/03/1992 Decision: Granted with Legal Agreement (GWLA)

11/AP/3788 Application type: Certificate of Lawfulness - proposed (CLP) New condensing units to be installed in the location of two previously removed condensing units

Decision date 29/12/2011 Decision: Refused (REF)

12/AP/1462 Application type: Full Planning Permission (FUL) Two new air conditioning units on rear roof.

Decision date 19/11/2012 Decision: Granted (GRA)

15/AP/4290 Application type: Full Planning Permission (FUL) Installation of a Cycle Hire docking station on the western side of Blackfriars Road containing a maximum of 42 docking points for scheme cycles, terminal and 12 cycle stands.

Decision date 22/12/2015 Decision: Granted (GRA)

15/AP/4960 Application type: Screening Opinion (EIA) (SCR) Screening Request for In accordance with Regulation 5(2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 for the redevelopment of the site to provide a 20 storey building comprising approximately 23,000sqm Office (B1), 435sqm Retail (A1) and ancillary plant, cycle parking.

Decision date 26/01/2016 Decision: Screening Opinion - EIA not required (SCR)

15/EQ/0148 Application type: Pre-Application Enquiry (ENQ) FOLLOW-UP (Re-development of sites to provide a mix of offices, residential and community floor space)

Decision date 10/02/2016 Decision: Pre-application enquiry closed (EQC)

15/EQ/0253 Application type: Pre-Application Enquiry (ENQ) Re-development of site to provide a mix of offices, residential and community floor space.

Decision date 10/02/2016 Decision: Pre-application enquiry closed (EQC)

15/EQ/0337 Application type: Pre-Application Enquiry (ENQ) Redevelopment of site to provide active frontages at ground floor with office above.

Decision date 10/02/2016 Decision: Pre-application enquiry closed (EQC)

This was the last in a series of pre-application enquiries/discussions with the applicant concerning the proposed development. Following negotiations, the final scheme was reduced significantly in height and bulk, with an amended design and materiality and an improved public realm and servicing offer.

Planning history of adjoining sites

6. <u>Application reference 15/AP/0237: Wedge House, 32 - 40 Blackfriars Road -</u> <u>GRANTED 26/08/2015</u>

Redevelopment of land and buildings to provide a part 7, part 12, part 14 storey building plus basement, ground and mezzanine levels, comprising office (Class B1) and hotel (Class C1) with ancillary cafe/bar/restaurant. This scheme is now under construction.

7. <u>Application Reference 12/AP/3940: Sampson House and Ludgate House - GRANTED</u> 28/03/2014

Demolition of existing buildings and the construction of a mixed use development totalling 144,571 sq.metres GEA comprising 492 flats (Class C3), 45,372 sqm (including basement) of offices (Class B1), 2,581sqm of retail (Classes A1-A5), 1,969sqm of community uses (Class D1) and 1,014sqm of gym (Class D2). New open space including formation of two new east-west routes, new public square, reconfigured vehicular and pedestrian access and works to the public highway with associated works including landscaping and basement car park for 200 cars (including 54 disabled car parking spaces) plus servicing and plant areas. Change of use of the railway arches from a nightclub to retail, gym and community uses. Configuration of the toilet block for retail uses and toilets.

This permission has not been implemented

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

Erection of a 50 storey tower, and a 4 and 6 storey building to provide a mixed use development comprising a hotel, 274 flats, retail space.

This scheme is now under construction.

9. <u>Application reference 10/AP/3372: 231 - 241 Blackfriars Road - GRANTED</u> <u>15/06/2011</u>

Erection of a 20 storey building with basement (maximum 89m AOD) to provide 29,198sqm of office floorspace and 455sqm of ground floor retail floorspace (Class A1/A2/A3/A4), with plant, rear servicing area and cycle parking.

This development has now been completed.

10. Application reference 09/AP/1749: 46 - 49 Blackfriars Road - GRANTED 09/11/2009

Demolition of existing building and erection of a new 14 storey building (maximum 47.93m AOD) incorporating two hotels with a total of 477 bedrooms (Class C1 - total floorspace 16414sqm GIA) each with restaurant (Class A3 - total floorspace 142sqm

GIA).

11. Application reference 08/AP/2809: 6 Paris Gardens - GRANTED 11/02/2009

Erection of a part 9, part 13 storey (maximum height approximately 41.3 metres above ground level) building plus basement levels to provide for a mixed use development comprising a ballet school (Class D1 use) and 162 units (253 bed spaces) of student accommodation.

12. <u>Application reference 07/AP/0301: 20 Blackfriars Road - GRANTED on appeal</u> 02/05/2008

(Demolition of existing buildings and redevelopment to provide a mixed use development comprising 286 residential flats (Class C3), 25,769sqm of office floorspace (Class B1), 1,710sqm of retail floorspace (Class A), 562sqm of Class D1 (community) uses, creation of new open space, reconfigured vehicular and pedestrian access and works to the public highway together with associated works including landscaping and the provision of a basement car park for up to 82 cars, plus servicing and plant areas. The development consists of two towers: an office tower of 23 storeys (maximum height 105m AOD), a residential tower of 42 storeys (maximum height 148m AOD) and lower rise buildings of up to 7 storeys fronting Stamford Street and Paris Gardens). This development has been implemented by the demolition of existing buildings however the developer wishes to pursue an alternative scheme which is currently the subject of pre-application discussions with the council. The site is now known as 18 Blackfriars Road.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

- 13. The main issues to be considered in respect of this application are:
 - a) principle of the proposed development in terms of land use
 - b) design quality
 - c) amenity impacts
 - d) flood risk
 - e) transport impacts
 - f) heritage impacts including impacts on local and strategic views
 - g) planning obligations
 - h) sustainable development implications
 - i) all other relevant material planning considerations.

Planning policy

- 14. The statutory development plans for the borough comprise the National Planning Policy Framework 2012, London Plan 2015, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007 July).
- 15. The site is located within the:

- Central Activities Zone (CAZ)
- Bankside, Borough and London Bridge Opportunity Area
- Bankside, Borough and London Bridge Strategic Cultural Area
- Borough and Bankside District Town Centre
- Air Quality Management Area.
- 16. It has a Public Transport Accessibility Level (PTAL) of 6b where 1 is the lowest level and 6b the highest, indicating excellent access to public transport.
- 17. The following listed structures are close to the site:
 - Christ Church (Grade II)
 - Christ Church Gardens drinking fountain (Grade II)
 - 1, 2 and 3 Paris Gardens (Grade II)
 - 15 and 17 Hatfields (Grade II)
 - 1 and 3 Stamford Street (Grade II).
- 18. The Waterloo and Roupell Street Conservation Areas lie within the London Borough of Lambeth, immediately to the west of the site.
- 19. The following conservation areas lie within the surrounding area:
 - Old Barge House Alley approx 300 metres to the north west
 - Kings Bench approx 340 metres to the south east
 - Valentine Place approx 340 metres to the south.
- 20. This application should be determined in accordance with the development plan unless material considerations indicate otherwise; and the following national framework, regional and local policy and guidance are particularly relevant.

21. National Planning Policy Framework (the Framework)

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

22. London Plan July 2015 consolidated with alterations since 2011

Policy 2.5 Sub-regions Policy 2.10 Central Activities Zone - strategic priorities Policy 2.11 Central Activities Zone - strategic functions

Policy 2.13 Opportunity areas and intensification areas

Policy 4.1 Developing London's economy

Policy 4.2 Offices

Policy 4.3 Mixed use development and offices

Policy 4.12 Improving opportunities for all

Policy 5.1 Climate change mitigation

Policy 5.2 Minimising carbon dioxide emissions

Policy 5.3 Sustainable design and construction

Policy 5.12 Flood risk management

Policy 5.13 Sustainable drainage

Policy 5.15 Water use and supplies

Policy 5.18 Construction, excavation and demolition waste

Policy 5.21 Contaminated land

Policy 6.1 Strategic approach (Transport)

Policy 6.2 Providing public transport capacity and safeguarding land for transport

Policy 6.9 Cycling

Policy 6.10 Walking

Policy 6.11 Smoothing traffic flow and tackling congestion

Policy 6.12 Road network capacity

Policy 7.3 Secured by design

Policy 7.4 Local character

Policy 7.5 Public realm

Policy 7.6 Architecture

Policy 7.7 Location and design of tall and large buildings

Policy 7.8 Heritage assets and archaeology

Policy 7.14 Improving air quality

Policy 7.15 Reducing and managing noise

Policy 8.2 Planning obligations

Policy 8.3 Community infrastructure levy

23. Core Strategy 2011

Strategic Targets Policy 1 - Achieving growth Strategic Targets Policy 2 - Improving places Strategic Policy 1 - Sustainable development Strategic Policy 2 - Sustainable transport Strategic Policy 3 - Shopping, leisure and entertainment Strategic Policy 10 - Jobs and businesses Strategic Policy 11 - Open spaces and wildlife Strategic Policy 12 - Design and conservation Strategic Policy 13 - High environmental standards

24. Southwark Plan 2007 (July) – saved policies

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.

Policy 1.1 Access to Employment Opportunities

Policy 1.4 Employment Sites

Policy 1.7 Development within Town and Local Centres

Policy 2.5 Planning Obligations Policy 3.1 Environmental Effects Policy 3.2 Protection of Amenity Policy 3.3 Sustainability Assessment Policy 3.4 Energy Efficiency Policy 3.6 Air Quality Policy 3.7 Waste Reduction Policy 3.9 Water Policy 3.11 Efficient Use of Land Policy 3.12 Quality in Design Policy 3.13 Urban Design Policy 3.14 Designing Out Crime Policy 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites Policy 3.19 Archaeology Policy 3.20 Tall Buildings Policy 3.28 Biodiversity Policy 3.29 Development within the Thames Policy Area Policy 3.31 Flood Defences Policy 5.1 Locating Developments Policy 5.2 Transport Impacts Policy 5.3 Walking and Cycling Policy 5.6 Car Parking

25. Supplementary Planning Documents

Section 106 Planning Obligations and CIL SPD 2015 Blackfriars Road SPD 2014 Sustainable Transport Planning SPD September 2010 Sustainability Assessment 2009 Sustainable Design and Construction SPD February 2009 Design and Access Statements SPD September 2007

26. Greater London Authority Supplementary Guidance

Use of planning obligations in the funding of Crossrail 2010.

Principle of development

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

Policy context

- 28. The application site is located within the Central Activities Zone (CAZ); Bankside, Borough and London Bridge Opportunity Area and the Borough and Bankside District Town Centre. The site also falls within the area covered by the Blackfriars Road SPD, and was identified as a potential development site in the SPD (site 13).
- 29. The London Plan considers opportunity areas to be "the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other developments linked to existing or potential improvements to public transport." London Plan policy 2.11 'CAZ Strategic functions' and policy 4.3 'Mixed use development and offices' require that increases in office floorspace in a development should provide for a mix of uses, including housing, unless such a mix would demonstrably conflict with other policies in the London Plan. Paragraph 4.17 of

the London Plan does recognise that exemptions to this can be submitted where mixed uses might compromise broader objectives, such as sustaining an important cluster of business activity.

- 30. Southwark's Core Strategy reinforces the London Plan aspirations for development in the CAZ to support London as a world class city. The CAZ and opportunity areas are targeted as growth areas in the borough where development will be prioritised. The council will allow more intense development for a mix of uses in the growth areas and make sure development makes the most of a site's potential and protects open space (strategic policy 1).
- 31. The adopted Blackfriars Road SPD sets out (paragraph 2.2.3) the emerging vision for Blackfriars Road which is:

"Blackfriars Road will be transformed into a vibrant place where people will want to work, live and visit. The historic, wide boulevard will provide a range of different activities, regenerating the area from the river along Blackfriars Road and stimulating change at the Elephant and Castle."

32. The existing buildings on the site are under-utilised and do not maximise the efficient use of this central location. The existing building makes a poor contribution to the local streetscape and detracts from the quality of the urban environment. The proposed scheme would deliver a high quality office development with retail at ground floor and B1 office floorspace on upper levels and this fully accords with the principle of prioritising new development within the CAZ and opportunity areas. Redevelopment of the site would make an important contribution towards the regeneration of this section of Blackfriars Road, achieving the employment vision for the area creating an active frontage to Blackfriars Road. The principle of redevelopment is therefore strongly supported.

Land use

- 33. The 2014 Blackfriars Road SPD encourages new jobs and businesses along Blackfriars Road to help consolidate and expand the existing business cluster and reinforce the area as a strategic office and employment location. New business floorspace is encouraged and existing business floorspace is required to be retained or replaced.
- 34. A key objective towards achieving sustainable development is building a strong, competitive economy through securing economic growth. Policies 4.1 and 4.2 of the London Plan promote the contribution made by central London to London's economic success and seek to meet the needs of the central London office market.
- 35. At the local level, strategic policy 10 of the Core Strategy aims to protect existing business space and support the provision of up to 500,000sqm of additional business floorspace and 25,000 new jobs in the Bankside, Borough and London Bridge opportunity area. Existing business floorspace will also be protected in the wider CAZ and town centre locations where up to 30,000sqm of new business space will be encouraged. Saved policy 4.1 of the Southwark Plan requires existing office floorspace to be re-provided when sites are redeveloped.
- 36. The proposed building would provide 26,637sqm (GIA) of Class B1 office floorspace which represents an uplift of 13,797sqm. This re-provision and enlargement of B1 office floorspace with high quality, modern and flexible office accommodation is welcomed as a significant benefit of the scheme in accordance with adopted local and regional policy and meets the Core Strategy objective of increasing the number of jobs in Southwark.

- 37. The proposal would also provide 986sqm of Class A1/A3/A4 retail floorspace. This introduces a retail use on a site that is currently solely office, creating active frontages on the sites three street facing frontages and improving the retail offering for local workers and residents in line with the aspirations of the SPD.
- 38. It is noted that residential use does not form part of the mix of uses proposed on this site as required by London Plan policy 2.11. The Blackfriars Road SPD encourages the generation of new jobs and businesses along Blackfriars Road to help consolidate and expand the existing business service cluster and reinforce the area as a strategic office and employment location.
- 39. Incorporating residential use on this site would require separate cores, entrances, amenity and servicing. Given the physical constraints of the site and the limited site area it is considered that this would compromise the ability to develop the site to its full potential and as such a wholly commercial building offering a mix of office and retail floorspace would make the best use of the site. This would provide a significant uplift in high quality office floorspace, improve employment opportunities and offer active frontages along Blackfriars Road, Meymott Street and Colombo Street. The proposed mix of uses is therefore a welcome addition to the Blackfriars Road area and is fully supported.

Environmental impact assessment

40. The applicant submitted a request for a screening opinion under application reference 15/AP/4960 and it was considered that the proposed development did not constitute EIA development, based on a review of the scheme against both the EIA Regulations 2011 and the European Commission guidance.

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

Daylight

- 41. A daylight and sunlight report has been submitted which assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
- 42. The BRE sets out the rationale for testing the daylight impacts of new development through various light tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of the original value before the loss is noticeable.
- 43. 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.
- 44. Of the 10 buildings (404 windows) assessed as part of the daylight and sunlight analysis, there are four buildings (44 windows) that would have more than a 20% reduction in VSC alongside VSC levels below 27%. Each of these properties is considered in turn below.

Rose and Crown Public House, 47 Colombo Street

45. This building has eight windows that would see a reduction in VSC of more than 20% over existing values. Four of these windows serve a dining room with the remaining four windows serving two bedrooms. These windows would experience a loss of VSC between 21.35% and 24.14% with residual VSC values of between 16.75 and 18.12%. In terms of daylight distribution, none of the affected rooms would see a reduction in sky visibility in excess of 20%. Whilst VSC levels will be reduced beyond the 20% BRE guidelines, the rooms would still have good levels of sky visibility. The proposed VSC levels taken alongside the compliant daylight distribution levels are considered to be reasonable in an urban location.

49 Colombo Street

46. Of the eight windows assessed at this property, six would see reductions in VSC in excess of 20%. Four of these windows serve habitable rooms and the reductions would be in the range of 24.63% to 33.52% with residual VSC values of between 11.51 and 15.66%. In terms of daylight distribution, only one room would experience a reduction in sky visibility in excess of 20% and this room is a bathroom (which is not classed as a habitable room). Whilst the residual VSC levels would be relatively low they should be considered against the positive daylight distribution levels that will ensure good levels of sky visibility in what is a dense urban environment. The impact on this property is therefore considered to be acceptable.

Edward Edwards House

47. 81 windows were assessed at Edward Edwards House and 16 of these would have reductions in VSC in excess of 20% with losses in the range of 22.06% to 51.59%. It should be noted that the VSC levels of these affected windows were already low and as such any further reduction leads to a significant percentage loss. For example, the worst affected window has an existing VSC level of 2.52% and the proposed VSC level is 1.22%. This means the reduction in VSC is 51.59% even though the reduction in the VSC level itself is low. As such the daylight distribution test better reflects the impact of the proposed development on Edward Edwards House and this assessment demonstrates that only one room will experience a loss of sky visibility in excess of 20%. The actual loss is 21.7% which is just beyond the BRE guidelines and as such the impact is considered acceptable.

216 - 220 Blackfriars Road

48. A total of 14 windows out of 37 would experience a loss of VSC in excess of 20% with the reduction ranging from 20.37% to 23.29%. These losses are only slightly in excess of the BRE guideline of 20% and the residual VSC levels are acceptable for such a densely urbanised location. Furthermore the daylight distribution test demonstrates that none of the rooms within the building would have reductions in sky visibility of more than 20%. In fact the largest reduction in sky visibility at this building is 6% which is well within the BRE guidelines and is a good result for a building in a heavily urbanised location.

Sunlight

- 49. Only windows that face within 90 degrees of due south are tested for the impact of a development on sunlight.
- 50. Only one room out of the 100 rooms which are material for assessment in sunlight terms would breach BRE guidance by virtue of its total sunlight amenity level falling

from 27% to 21% which equates to a 22.2% alteration. Additionally, Annual Probable Sunlight Hours for all remaining rooms will be at least five hours in winter and 25 hours over the course of the year. The single room failure is only a minor breach in BRE guidance and the development is therefore considered to have an acceptable impact in terms of sunlight.

Overshadowing

51. The main impact in terms of overshadowing will be on the Paris Gardens tennis courts and Christchurch Gardens. The tennis courts will remain largely unaffected in terms of overshadowing with good levels of sunlight being retained. Christchurch Gardens will still retain at least two hours of sunlight across more than 67% of the area in March when the sun is lower in the sky and as such will remain well lit throughout the year.

Overlooking, outlook and privacy

52. The proposed development is located a sufficient distance from the nearest residential properties to ensure that there will be no adverse impact on overlooking, loss of outlook or loss of privacy. The impact on views is considered in more detail in the design section below.

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

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

Transport issues

54. 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

55. The site has the highest level of public transport accessibility with a PTAL level of 6b, rated on a scale of 1 - 6 where 1 represents low accessibility and 6 the highest accessibility. There are several railway and London Underground stations located within the vicinity of the site. Blackfriars South, Southwark, Waterloo and Waterloo East are all close by. The site is well connected to the London bus network, cycle routes and walking routes with a new Cycle Super Highway immediately to the front of the site on Blackfriars Road. The applicant has agreed financial contributions towards the implementation of a QuietWay on Meymott Street and the extension of a cycle hire docking station on either Colombo Street or Blackfriars Road.

Servicing

56. Servicing will take place entirely on-site with an entrance to the servicing bay located off Meymott Street. This arrangement is considered acceptable subject to confirmation of visibility splays and detailed design and this will be secured by condition.

Car and cycle parking

57. The proposed development will have no car parking which is supported in this highly accessible central London location. Cycle parking will be in excess of the London Plan standards with 414 spaces being provided alongside shower and locker facilities. This is a positive aspect of the scheme and it will support the Council's sustainable transport objectives.

Other matters

58. The number and volume of waste receptacles is acceptable and they will be emptied in line with a Service Management Plan that will be agreed and secured as part of the s106 agreement. A Demolition/Construction Environmental Management Plan and a Travel Plan will also be secured in the s106 agreement.

Design issues

Overview

- 59. The site has frontages onto Blackfriars Road to the east, Meymott Street to the south and Colombo Street to the west. It is not located in a conservation area however it lies close to the Roupell Street conservation area which lies to the west within the London Borough of Lambeth.
- 60. The proposal is for a 22 storey (86.4m AOD) predominantly commercial building fronting Blackfriars Road, stepping down to 13 storeys to the rear on Colombo Street. The main office entrance will be on Blackfriars Road with the servicing entrance located on Meymott Street. The retail units will be accessed from Blackfriars Road, Meymott Street and Colombo Street. A double height colonnade area is provided on Colombo Street to the rear of the site providing opportunities for outdoor seating and planting.
- 61. The proposed building is divided into three parts: a predominantly glass two storey base; a brick clad middle rising from four storeys on Blackfriars Road to 11 storeys on Colombo Street with the remaining upper floors clad in masonary (reconstituted stone). The brick middle and masonary top are separated by a two storey glazed gallery at level 5/6 which extends along the Blackfriars Road and Meymott Street frontages.
- 62. The redevelopment would have positive impacts on local streets due to the widening of the narrow pavement on Meymott Street and the creation of an area of public realm to the rear of the site on Colombo Street.

Tall buildings

63. The Core Strategy policy SP12 designated the northern end of Blackfriars Road as an area suitable for tall buildings. This is reinforced within the Blackfriars Road SPD - policy SPD 5 'Building heights' states that the tallest buildings will be at the north end of Blackfriars Road, and that buildings over 50 metres in height must demonstrate that they contribute positively to London's skyline and views, and make an exceptional contribution to the regeneration of the area. In line with Southwark Plan saved policy 3.20, tall buildings must make a positive contribution to the landscape, be located at a point of landmark significance, demonstrate exceptional design quality, relate well to its surroundings at street level and contribute positively to the London skyline as a whole.

- 64. The Core Strategy and Blackfriars Road SPD do not strictly define the area for tall buildings at the north end of Blackfriars Road, other than stating that the tallest buildings should be clustered around the Blackfriars Road/Stamford Street junction. The policy would suggest that heights should taper down towards the south, however this proposal would be taller than the recently consented Wedge House scheme immediately to its north.
- 65. In developing the proposal for the Blackfriars Road frontage, a more detailed appraisal of this part of the Blackfriars Road has been carried out by the applicant involving several viewing points along the length of the road to better understand how height is appreciated in this linear context. In order for it to be considered appropriate, the chosen height has to be of an order that reflects the prevailing character of the boulevard which is accomplished through changing materiality at the prevailing shoulder height and breaking the building down into two constituent parts separated by the double height glazed gallery.
- 66. In its height scale and massing the proposal is considered to be appropriate. When it is considered in the round and from a number approaches, the local views demonstrate that the proposed height is appropriate in this setting. It concentrates the height on the Blackfriars Road frontage; it reinforces the civic scale of this important boulevard and introduces variety in the height appropriately without being overly dominant, and makes a positive contribution to the character of this part of Blackfriars Road. The way the building steps down significantly on Colombo Street contributes positively the urban setting around the tennis courts at the southern end of Paris Gardens. This meaningful drop in scale reinforces the change in the character from Blackfriars Road to Colombo Street. It is a device that enables the design to respond directly to its context and means that, viewed from Colombo Street the tower will appear in the backdrop over what appears to be a lower building, which is appropriate.

Views

- 67. The applicants have submitted a Townscape and Visual Impact Assessment (TVIA). the TVIA demonstrates that there will be no impact on any London View Management Framework views as the site does not lie within any of the protected viewing corridors.
- 68. The substantial scale of the proposal will have an impact on its immediate setting and local views, in particular the views from Roupell Street and the sequence of views through to Colombo Street. This is considered further in the heritage section below.

Architectural design

- 69. The building is considered to be a well proportioned addition to Blackfriars Road, exhibiting a strong and original design concept through its constituent parts. The base is strong, active and engaging. The main body of the building is defined by a gridded masonry frame with glass infill which gives it proportion and order. On the upper portions, the frame of the building is finished in a lighter coloured reconstituted stone-like material. The two different finishes are separated by a double-height glazed band at the middle of the building accommodating shared conference facilities which gives the building added interest and variety.
- 70. The masonry fabric of the building directly contrasts with the glass towers to the north on Blackfriars Road and allows the building to respond directly to its immediate context. The design is undoubtedly high in quality. The choice of materials is appropriate and the detailed design demonstrates a confidence and finesse.

Landscape and public realm

71. This is a severely constrained site with limited opportunities for public ream. The scheme benefits from a generous existing pavement on Blackfriars Road and it seeks to enhance Meymott Street by providing a substantially widened footway along this narrow street. The most substantial public realm improvement is proposed on Colombo Street where the proposal proposes a double-height colonnaded landscaped space which is designed to facilitate the movement of commuters to and from Waterloo Station. The scale of the proposed space is sufficient for mature landscape to be provided on the site and complements the more intimate character of Colombo Street. Given the limited opportunity for meaningful public realm on Blackfriars Road, this proposal has sought to improve the facilities currently available by providing good active landscaped space in the area, which links up with other open spaces in the area including Christ Church Gardens and is supported.

Impact on heritage assets

- 72. The nearest designated heritage asset is the Christ Church and its gardens/drinking fountain. This proposed building is separated from the listed Christ Church and its Gardens by Wedge House. This separation means that this proposal is unlikely to have an impact on the setting of this sensitive historic church.
- 73. In 2008 the inspector considered this sensitive setting of Christ Church Gardens very carefully in relation to the more significant proposals for 20 Blackfriars Road to the north albeit before the church was listed and found that the contrast of the open setting to the significant scale of buildings on the Blackfriars Road was appropriate and indeed desirable. In a sense, the contrast in scale heightens the quality of this delicate tranquil space.
- 74. The views demonstrate that the proposed new tower is most visible from within the Roupell Street conservation area especially as one leaves the conservation area and travels east along Colombo Street. In the main, from within the conservation area, the brick-clad base of the new tower is likely to be visible to the left of the main axis of this historic street. In these views the building will be a prominent and ordered feature in the distance and part of the cluster of tall buildings at the northern end of the Blackfriars Road. These include the recently implemented One Blackfriars and the completed 240 Blackfriars Road buildings. The choice of cladding materials contributes positively to this view. The brick grid reflects the tone and texture of the Roupell Street conservation area is left largely unharmed by the cumulative impact of this new tower. Indeed the addition of a masonry clad block onto Colombo Street will compliment this historic setting and, given the right choice of brick, could enhance this view.

Design Review Panel

- 75. The scheme was reviewed by the DRP in February 2016 at the pre-application stage. The Panel generally welcomed the design approach to the site and the quality of material presented. They raised questions about the way the height had been justified on this site and its relationship to Wedge House. They requested additional information from the architects. They also challenged the designers to adjust their design in respect of sustainability, servicing, land-use and detailed features which they felt could improve the scheme significantly.
- 76. As a result of the DRP's comments, the scheme was amended and improved in advance of application. Further architectural details were provided in respect of the detailed design of features like the cladding and the central 'conference' space, the

height of the active uses at the base was increased significantly and the linking feature, "the cassette", was reduced in height to better reflect the height of the consented Wedge House proposal.

Conclusion on design and heritage

77. The proposed building would add visual interest to the Blackfriars Road area through a well proportioned building of the highest standard of design. The building exhibits an orderly yet original design concept and relates well to its immediate surroundings through the different materiality and scale of its constituent parts. The building would have a positive impact on the Roupell Street conservation area and would not harm the nearby listed Christ Church and gardens. Subject to materials, the building would be a positive addition to Blackfriars Road and is fully supported.

Impact on trees

- 78. An arboricultural survey has been undertaken which identified five trees and one group of trees within the immediate area of the application site. The group of trees is located within Christ Church Gardens and will remain unharmed by the development. Of the five trees identified in the survey, one is being proposed for removal, a category C tree in the boundary of the application site on Colombo Street. The remaining trees will be retained.
- 79. The proposal will include re-planting of three trees within the new public realm on Colombo Street and tree protection measures will be secured by condition for the retained trees. This approach is fully supported by the council's Urban Forester.

Planning obligations (s106 undertaking or agreement) and CIL

- 80. Saved policy 2.5 of the Southwark Plan and policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved policy 2.5 of the Southwark Plan is reinforced by the recently adopted s106 planning obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic policy 14 'Implementation and delivery' of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:
 - Necessary to make the development acceptable in planning terms
 - Directly related to the development
 - Fairly and reasonably related in scale and kind to the development.
- 81. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in regulation 122 can be given weight.

s106

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

Planning Obligation	Mitigation	Applicant Position
Employment during construction	58 Jobs lasting a minimum of 26 weeks for an unemployed Southwark resident	Agreed
	58 residents trained in pre/post employment short courses	
	15 new apprenticeships	
	Or a payment of £280,000	
Employment in the development	174 jobs lasting a minimum of 26 weeks	Agreed
	Or a payment of £748,000	
Transport - site specific	£250,000 towards the implementation of a QuietWay on Meymott Street	Agreed
Transport for London	£100,000 towards cycle hire docking station extensions	Agreed
	£443,297 towards CrossRail	
Public realm	The developer will be providing a new public realm as part of the development. An additional £80,000 is required towards improvements to Christ Church Gardens	Agreed
Archaeology	£11,17	Agreed
Carbon Offset - Green Fund	£89,910	Agreed
Trees	Not specifically required unless highways issues prevent some of the proposed trees from being planted in which case a contribution will be sought - £3,000 per tree	Agreed
Total	£2,002,378	
Admin charge (2%)	£40,047.56	

83. The s106 agreement will also secure an Estate Management Plan, Construction and Environmental Management Plan, Travel Plan and Service Management Plan. The

contributions and in lieu works detailed in the table above will also be secured under the s106 agreement alongside any s278 highways works and amendments to the traffic management order.

84. In the event that an agreement has not been completed by 31 October 2016, the Committee is asked to authorise the Director of Planning to refuse permission, if appropriate, for the following reason:

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

Community Infrastructure Levy

- 85. Section 143 of the Localism Act 2011 states that any financial sum that an authority has received, will, or could receive in the payment of CIL is a material "local financial consideration" in planning decisions. The requirement for Mayoral and Southwark CIL is a material consideration. However, the weight to be attached to a local finance consideration remains a matter for the decision-maker.
- 86. Mayoral CIL is to be used for strategic transport improvements in London, primarily Crossrail. The levy is applied to all developments at a rate of £35 (plus indexation) per square metre in Southwark. Southwark CIL in this location has a residential rate of £125 for retail, £70 for office and zero for other proposed uses. SCIL is to be used for infrastructure that supports growth with a Southwark commitment to spend at least 25% locally.
- 87. The following rational has been used to calculate the floorspace of the proposed development in terms of CIL calculations:
 - Existing floor space of 12,840sqm which is all office space
 - Proposed floor space of 27,623sqm of which 26,637sqm is office (96%) and 986sqm is retail (4%)
 - And that the existing floor space has been used for 6 months in the last 36 months.
- 88. Using the calculations above, the proposed development generates a Mayoral CIL payment of £783,499 based on a 14,783sqm increase in total floor space at £50 per sqm.
- 89. Likewise the development generates a Southwark CIL payment of £1,067,332 based on:
 - 14,783sqm x 0.96 (proportion of increased floor space as office) = 14,191sqm x £70sqm = £993,417
 - 14,783sqm x 0.04 (proportion of increased floor space as retail) = 591sqm x £125sqm = £73,915.

Sustainable development implications

Carbon reduction

- 90. The energy statement demonstrates how the energy hierarchy has been applied to the proposed development in order to achieve the carbon reduction targets set out in strategic policy 13 of the Core Strategy and the London Plan. The Core Strategy and the London Plan also state that there is a presumption that all major development proposals will seek to reduce carbon dioxide emissions by at least 20% through the use of on-site renewable energy generation wherever feasible. In addition, the London Plan expects developments to achieve a reduction in carbon dioxide emissions of 35% over part L of the 2013 building regulations.
- 91. The proposed development will incorporate PV panels and CHP alongside a range of Be Lean, Be Clean, Be Green principles that result in an overall carbon reduction of 25.76% over part L of the 2013 building regulations. This would result in a shortfall of 49.95 tonnes of CO2 below the 35% requirement that will need to be captured by the Carbon offset Green Fund. This requires a payment of £1,800 per tonne which equates to £89,910. This will be included within the s106 legal agreement.

BREEAM

92. The new building will be required to meet BREEAM 'Excellent' and a BREEAM preassessment has been submitted with the application demonstrating that this category is achievable. Attaining BREEAM 'Excellent' for the overall development will be a conditioned requirement of any consent issued.

Other matters

Ecology

93. The council's Ecology Officer has reviewed the Preliminary Ecological Appraisal submitted with the application and agrees with its findings, acknowledging that the site offers negligible interest for biodiversity at present. Subject to conditions regarding brown roofs and bat boxes, the Ecology Officer supports the proposed development.

Air quality and noise

- 94. The site lies within an Air Quality Management Area and the applicant has submitted an Air Quality Assessment alongside a Noise Assessment in order to assess the impact of the development on these two topics. The assessments demonstrate that, for air quality there may be an impact during demolition and construction but once completed, the operational development is likely to have a minimal impact on air quality. Likewise, noise is considered to be an impact during demolition/construction however the operational phase of the development can be adequately mitigated through condition.
- 95. A condition will also be imposed to secure demolition and construction management plans to ensure appropriate mitigation for air quality and noise impacts during the demolition/construction phase of the development.

Micro-climate

96. The micro-climate study submitted with the application demonstrates that the pedestrian level environment will not be adversely affected by the proposed development.

Flood risk

97. The site is located within flood zone 3 which is considered to be an area of high risk of flooding due to the proximity of the tidal River Thames. The site is protected by the Thames Barrier and related defences. A flood risk assessment has been submitted with the application and the Environment Agency has been consulted on the proposal, with no objections.

Conclusion on planning issues

- 98. The development enhances the quantum and quality of office accommodation on the site in full accordance with local and regional policy. The location of the application site makes it ideal for office and retail use and meets the aspirations of the Blackfriars Road SPD, greatly improving the employment offer in the area whilst providing new active frontages with retail units to serve both workers and residents. The development will provide approximately 2,285 jobs which is an increase of 1,571 over the existing provision and this is welcomed.
- 99. The proposal involves the provision of a tall building which has been considered carefully against the requirements of the London Plan and local design policies. The building will sit on the periphery of the established cluster of tall buildings at this northern end of Blackfriars Road and contextualises well with its surroundings. Although the proposal would be visible from a number of vantage points, this is not considered to be harmful or unduly prominent. Officers consider that the scheme has an exemplary standard of design which would be a positive addition to the area. Furthermore the impacts on the adjacent Roupell Street conservation area are not considered to be harmful and the building has an acceptable impact on both local and strategic views.
- 100. The impact of the building in terms of daylight and sunlight is considered to be acceptable given the highly urbanised location and all properties would continue to have good levels of sky visibility as well as winter sun. The Paris Gardens Tennis Courts and Christ Church Gardens will remain well lit throughout the year and would not be detrimentally harmed by the proposal.
- 101. The proposal would be capable of generating significant economic benefits for the local and wider area, would also seek to enhance pedestrian movement in the local area and activate this section of Blackfriars Road.
- 102. In line with the requirements of the NPPF, the council has applied the presumption in favour of sustainable development. The proposed development would accord with sustainable principles and would positively promote a suitable mixed use development and an effective use of land that meets the aspirations of the Blackfriars Road SPD. It is located in an appropriate location being within the CAZ, the Bankside, Borough and London Bridge opportunity area and the Borough and Bankside Town Centre. It is therefore recommended that permission be granted, subject to conditions as set out in the attached draft decision notice, completion of a s106 agreement on terms as set out above, and referral to the Greater London Authority.

Community impact statement

103. In line with the council's Community Impact Statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.

- a) The impact on local people is set out above
- b) There are no issues relevant to particular communities/groups likely to be affected by the proposal
- c) There are no likely adverse or less good implications for any particular communities/groups.

Consultations

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

Consultation replies

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

Summary of consultation responses

- 106. All comments received from statutory and non statutory organisations have been summarised and addressed below;
- 107. <u>Arqiva</u>

No observations.

Response - noted.

108. Environment Agency

No objections. Informative are recommended regarding waste, both on site and hate to be taken off site.

Response - noted, the relevant informative will be added to any consent issued.

109. Greater London Authority

The proposal falls short of the target 35% reduction in Carbon Dioxide emissions required by policy. The applicant should consider further measures aimed at securing additional carbon reductions. The additional carbon reductions and further information required regarding air quality should be secured by conditions or s106. The design is considered to be of a high standard and the scale/massing of the building is not considered to have an adverse impact on the conservation areas. The GLA also welcome the employment space that is on offer.

Response - noted and agreed. An energy strategy will be secured as part of the s106 agreement as well as additional measures with regards to air quality to secure Air Quality Neutral.

110. Historic England

Lambeth Council's assessment of the Roupell Street conservation area in their 2007 Statement warns of the sensitivity of views in the area to tall buildings. The view east down Roupell Street is one of the most important in that conservation area, and the current building on the site appears to respond to this, its southern elevation stepped back to ease out of this view. The Visual Impact Assessment included with the application makes clear that views along Roupell Street and along the parallel Whittlesey Street would be substantially altered by the proposed building. It would dramatically terminate views within the Roupell Street conservation area with an element which presents a startling contrast in scale to the conservation area, and would visually overwhelm the historic streets. The form and design of the building, which presents broad, sharp planes to the west, exacerbates this impact. The harm caused to designated assets by the proposed development, including any harm identified to the Waterloo conservation area, should be weighed in the planning balance, and special regard should be given to preserving the significance of affected conservation areas. Any harm should be clearly justified and outweighed by public benefits.

Response - the views demonstrate that the proposed new tower is most visible from within the Roupell Street conservation area especially as one leaves the conservation area and travels east along Colombo Street. In the main, from within the conservation area, the brick-clad base of the new tower is likely to be visible to the left of the main axis of this historic street. In these views the building will be a prominent and ordered feature in the distance and part of the cluster of tall buildings at the northern end of the Blackfriars Road. These include the recently implemented One Blackfriars and the completed 240 Blackfriars Road. The choice of cladding materials contributes positively to this view. The brick grid reflects the tone and texture of the Roupell Street Conservation Area is left largely unharmed by the cumulative impact of this new tower. Indeed the addition of a masonry clad block onto Colombo Street will compliment this historic setting and, given the right choice of brick, could enhance this view.

111. London Borough of Lambeth

No objections.

Response - noted.

112. London Underground

No comments to make on the current proposal.

Response - noted.

113. Metropolitan Police

The development should be able to achieve the security requirements of Secured by Design and the relevant condition should be attached to any consent issued.

Response - noted and agreed, the relevant condition will be attached to any consent issued.

114. Natural England

No objection.

Response - noted.

115. Thames Water

No objection subject to conditions relating to piling, water supply infrastructure and surface water drainage.

Response - noted and agreed, the relevant condition will be attached to any consent

issued.

116. Transport for London

TfL are satisfied that the development is unlikely to have an adverse impact on the transport network. TfL would prefer to see servicing are place from Colombo Street. Cycle parking is provided over two floors and each floor has separate locker and changing/showering facilities; it should be confirmed that cycle parking is not segregated by gender. Care free development is supported but the developer should justify the lack of blue badge parking. Contributions are sought towards CrossRail and £100,000 is sough to extend cycle hire facilities on Colombo Street.

Response - the applicant has worked with LBS Transport officers at pre-application stage to ensure servicing takes place on-site and Meymott Street was considered the best option as servicing from Colombo Street would result in a diminished public realm offering. Additionally, Colombo Street is already a very busy street, both in terms of traffic and pedestrians and as such it was not considered appropriate to add further servicing pressure. Cycle parking is not segregated by gender and there are blue badge disabled bays located in close proximity to the site. Furthermore, this is an extremely accessible location with step free access from the nearest train and underground stations. As such the car free nature of the development is supported. The applicant has agreed the financial contributions sought by TfL.

- 117. Consultation requests were also sent to the following authorities/agencies with no reply received:
 - City of London
 - City of Westminster
 - Civil Aviation Authority
 - Department for Communities and Local Government
 - London Fire and Emergency.
- 118. Ward members for Bishops Ward within the London Borough of Lambeth have submitted an objection to the proposed development raising issues such as the impact of the development on the adjacent conservation areas, impact on views, excessive height, impacts on the skyline and poor consultation by the developer. These issues are consider below alongside the main points of objection (x25) raised by members of the public.
- 119. The proposed building will have an adverse impact on the surrounding area including the Roupell Street and Waterloo conservation areas and impacts on views.

Response - the views demonstrate that the proposed new tower is most visible from within the Roupell Street conservation area especially as one leaves the conservation area and travels east along Colombo Street. In the main, from within the conservation area, the brick-clad base of the new tower is likely to be visible to the left of the main axis of this historic street. In these views the building will be a prominent and ordered feature in the distance and part of the cluster of tall buildings at the northern end of the Blackfriars Road. These include the recently implemented One Blackfriars and the completed 240 Blackfriars Road. The choice of cladding materials contributes positively to this view. The brick grid reflects the tone and texture of the Roupell Street conservation area is left largely unharmed by the cumulative impact of this new tower.

Indeed the addition of a masonry clad block onto Colombo Street will compliment this historic setting and, given the right choice of brick, could enhance this view.

120. The developer has failed to engage meaningfully with the community and the consultation process has been poor.

Response - the developer has submitted a Statement of Community Involvement which demonstrates that consultation took place during the pre-application process and as such it is considered that residents were engaged during this process. The consultation process is therefore considered to be adequate. Statutory consultation was undertaken by the London Borough of Southwark as part of the planning application.

121. The height, scale, bulk and materiality of the proposed building is unsuitable in this location and fails to comply with the SPD.

Response - the northern end of Blackfriars Road is considered to be a point of landmark significance and an appropriate location for a tall building. The Blackfriars Road SPD supports this position and envisages tall buildings in this location. This proposal varies from the SPD in that it is taller than the recently consented Wedge House where the SPD suggests that height should taper down towards the south. The height, scale and massing is considered acceptable in this location as the building introduces variety of height through materiality and steps down to the west towards Colombo Street and the adjacent conservation areas. This meaningful drop in scale describes the change in the character from Blackfriars Road to Colombo Street. It is a device that enables the design to respond directly to its context and means that, viewed from Colombo Street the tower will appear in the backdrop over what appears to be a lower building which is appropriate.

122. The construction of the building will have an adverse impact on health.

Response - it is acknowledged that the demolition and construction process can have temporary impacts during the course of these works. As such, a Demolition Environmental Management Plan and a Construction Environmental Management Plan will be secured in the legal agreement in order that the council can control and monitor the demolition and construction process to mitigate and limit any potential impacts.

123. The building is not of a sufficiently high standard of design.

Response - officers consider the building to be of a very high standard of design and one which is suitable for this location on Blackfriars Road. Conditions in relation to materials will be imposed to ensure the highest standard of finish.

124. There will be an adverse impact on daylight and sunlight to surrounding properties and open spaces.

Response - all of the assessed properties will retain good levels of daylight distribution and only one of the rooms assessed will have a reduction in sunlight in excess of the BRE guidelines. The open spaces adjacent to the site at Colombo Street Tennis Courts and Christ Church Gardens will remain well lit throughout the year.

125. The proposal will have an adverse impact on the skyline.

Response - the proposal will introduce variety in height along Blackfriars Road that will contextualise with the taller elements to the north and the lower elements to the south and west. This is considered to be beneficial to the skyline.

126. The development will result in micro-climate impacts.

Response - the micro-climate study submitted with the application demonstrates that the pedestrian level environment will not be adversely affected by the proposed development.

127. The development will create a corridor effect on Blackfriars Road.

Response - Blackfriars Road is a central London boulevard that is considered appropriate for tall buildings. Given the variety of height along Blackfriars Road it is unlikely that there will be a 'corridor' or 'tunnelling' effect.

128. Surrounding listed buildings and heritage assets will be adversely affected by the proposed development.

Response - the nearest designated heritage asset is the Christ Church and its gardens/drinking fountain. This proposed new tower sits is separate from the listed Christ Church and its Gardens by Wedge House. This separation means that this proposal is unlikely to have an impact on the setting of this sensitive historic church.

129. An additional objection was received from London and South Eastern Railway Ltd however the objection raises issues regarding the lease of the current office space and as such does not raise any material planning issues.

Human rights implications

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.

This application has the legitimate aim of providing office and retail use. 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/1016-A	Chief Executive's	Planning enquiries telephone:	
	Department	020 7525 5403	
Application file: 16/AP/1660	160 Tooley Street	Planning enquiries email:	
	London	planning.enquiries@southwark.gov.uk	
Southwark Local Development	SE1 2QH	Case officer telephone:	
Framework and Development		020 7525 5365	
Plan Documents		Council website:	
		www.southwark.gov.uk	

APPENDICES

No.	Title		
Appendix 1	Consultation undertaken		
Appendix 2	Consultation responses received		
Appendix 3	Human rights		
Appendix 4	Recommendation		
Appendix 5	Computer generated images		

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning				
Report Author	Terence McLellan, Team Leader				
Version	Final				
Dated	30 June 2016				
Key Decision?	No				
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER					
Officer Title		Comments sought	Comments included		
Strategic Director of Finance and Governance		No	No		
Strategic Director, Environment and Leisure		No	No		
Strategic director of Housing and Modernisation		No	No		
Director of Regeneration		No	No		
Date final report se	30 June 2016				

APPENDIX 1

Consultation undertaken

Site notice date: 24/05/2016

Press notice date: 12/05/2016

Case officer site visit date: n/a

Neighbour consultation letters sent: 18/05/2016

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

Argiva - digital communications City Of London City of Westminster Civil Aviation Authority Dept. for Communities & Local Government [for all types of casework in Annex A of Chief Planner's letter 10 March 2011 - see details on Xdrive] **Environment Agency** Greater London Authority Historic England London Borough of Lambeth London Fire & Emergency Planning Authority London Underground Limited Metropolitan Police Service (Designing out Crime) Natural England - London Region & South East Region Peabody, 45 Westminster Bridge Road Thames Water - Development Planning The Royal Parks Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

9 Brinton Walk London SE1 0XD 10 Nicholson Street London SE1 0XP 12 Nicholson Street London SE1 0XP 8 Brinton Walk London SE1 0XD 5 Brinton Walk London SE1 0XD 6 Brinton Walk London SE1 0XD 7 Brinton Walk London SE1 0XD 4 Nicholson Street London SE1 0XP Apartment 6 235 Blackfriars Road SE1 8NW Apartment 3 235 Blackfriars Road SE1 8NW Apartment 4 235 Blackfriars Road SE1 8NW Apartment 5 235 Blackfriars Road SE1 8NW H 3 6 Paris Garden SE1 8DJ H 4 6 Paris Garden SE1 8DJ H 5 6 Paris Garden SE1 8DJ H 2 6 Paris Garden SE1 8DJ 6 Nicholson Street London SE1 0XP 8 Nicholson Street London SE1 0XP 2 Nicholson Street London SE1 0XP 14 Nicholson Street London SE1 0XP 16 Nicholson Street London SE1 0XP 18 Nicholson Street London SE1 0XP Part Second Floor East Friars Bridge Court SE1 8NZ 1 Brinton Walk London SE1 0XD 10 Brinton Walk London SE1 0XD Part Second Floor West Friars Bridge Court SE1 8NZ Ninth And Tenth Floors 240 Blackfriars Road SE1 8NW Eleventh Floor North 240 Blackfriars Road SE1 8NW Eleventh Floor South 240 Blackfriars Road SE1 8NW 2 Brinton Walk London SE1 0XD 3 Brinton Walk London SE1 0XD 4 Brinton Walk London SE1 0XD 14 Brinton Walk London SE1 0XD 11 Brinton Walk London SE1 0XD 12 Brinton Walk London SE1 0XD 13 Brinton Walk London SE1 0XD Flat 26 Quadrant House SE1 0UW Flat 27 Quadrant House SE1 0UW Flat 28 Quadrant House SE1 0UW Flat 25 Quadrant House SE1 0UW Flat 22 Quadrant House SE1 0UW Flat 23 Quadrant House SE1 0UW Flat 24 Quadrant House SE1 0UW Flat 32 Quadrant House SE1 0UW Flat 33 Quadrant House SE1 0UW Flat 34 Quadrant House SE1 0UW Flat 31 Quadrant House SE1 0UW Flat 29 Quadrant House SE1 0UW Flat 3 Quadrant House SE1 0UW Flat 30 Quadrant House SE1 0UW Flat 13 Quadrant House SE1 0UW Flat 14 Quadrant House SE1 0UW Flat 15 Quadrant House SE1 0UW Flat 12 Quadrant House SE1 0UW Flat 1 Quadrant House SE1 0UW Flat 10 Quadrant House SE1 0UW Flat 11 Quadrant House SE1 0UW Flat 2 Quadrant House SE1 0UW Flat 20 Quadrant House SE1 0UW Flat 21 Quadrant House SE1 0UW Flat 19 Quadrant House SE1 0UW Flat 16 Quadrant House SE1 0UW Flat 17 Quadrant House SE1 0UW Flat 18 Quadrant House SE1 0UW Sixth Floor 240 Blackfriars Road SE1 8NW Pg 53 6 Paris Garden SE1 8DJ Pg 54 6 Paris Garden SE1 8DJ Pg 55 6 Paris Garden SE1 8DJ Pg 52 6 Paris Garden SE1 8DJ Pg 49 6 Paris Garden SE1 8DJ Pg 50 6 Paris Garden SE1 8DJ Pg 51 6 Paris Garden SE1 8DJ Pg 60 6 Paris Garden SE1 8DJ Pg 61 6 Paris Garden SE1 8DJ Pg 62 6 Paris Garden SE1 8DJ Pg 59 6 Paris Garden SE1 8DJ Pg 56 6 Paris Garden SE1 8DJ Pg 57 6 Paris Garden SE1 8DJ Pg 58 6 Paris Garden SE1 8DJ Pg 39 6 Paris Garden SE1 8DJ Pg 40 6 Paris Garden SE1 8DJ Pg 41 6 Paris Garden SE1 8DJ Pg 38 6 Paris Garden SE1 8DJ Pg 35 6 Paris Garden SE1 8DJ

Pg 36 6 Paris Garden SE1 8DJ

Pg 37 6 Paris Garden SE1 8DJ Pg 46 6 Paris Garden SE1 8DJ

Pg 47 6 Paris Garden SE1 8DJ

Pg 48 6 Paris Garden SE1 8DJ

Apartment 10 235 Blackfriars Road SE1 8NW H 1 6 Paris Garden SE1 8DJ Part First Floor East Friars Bridge Court SE1 8NZ Former Bin Store Part Ground Floor Friars Bridge Court SE1 8NZ Large Store Part Basement Friars Bridge Court SE1 8NZ Part Basement Store Friars Bridge Court SE1 8NZ 240 Blackfriars Road London SE1 8NW Apartment 1 235 Blackfriars Road SE1 8NW Apartment 2 235 Blackfriars Road SE1 8NW Managment Office Part Ground Floor Friars Bridge Court SE1 8NZ Annexe Part First Floor Friars Bridge Court SE1 8NZ Multisports Courts Hatfields SE1 8ND Third Floor To Fourth Floor 209-215 Blackfriars Road SE1 8NL Fifth Floor 209-215 Blackfriars Road SE1 8NL Basement Ground First To Third Floors Sungard Court Sunguard Court SE1 8ND Fourth Floor Sunguard Court SE1 8ND Railway Arch 84 Scoresby Street SE1 0XN Second Floor 209-215 Blackfriars Road SE1 8NL Part Basement Southwest Trains Friars Bridge Court SE1 8NZ Sixth Floor And Seventh Floor Friars Bridge Court SE1 8NZ Fourth To Seventh Floors 230 Blackfriars Road SE1 8NW Ground Floor To Third Floor 230 Blackfriars Road SE1 8PJ Part Ground Floor Railtrack Friars Bridge Court SE1 8NZ Part Basement Friars Bridge Court SE1 8NZ Second Floor And Third Floor 18 Hatfields SE1 8GN Lower Ground Floor 18 Hatfields SE1 8GN Excluding Part First Floor Chadwick Court SE1 8DJ Office 242 Blackfriars Road SE1 9UF 242b Blackfriars Road London SE1 9UF First Floor 209-215 Blackfriars Road SE1 8NL Part Third Floor Rennie House SE1 8DL Excluding Part Third Floor Rennie House SE1 8DL Ground And First Floor Rennie House SE1 8DL Ground Floor 18 Hatfields SE1 8GN First Floor 18 Hatfields SE1 8GN Second To Fourth Floor Rennie House SE1 8DL Second Floor Bastille Court SE1 8ND Third Floor Bastille Court SE1 8ND Versailles Court 3 Paris Garden SE1 8ND Third To Fourth Floor Friars Bridge Court SE1 8NZ Fourth Floor Bastille Court SE1 8ND Basement To Ground Floor 209-215 Blackfriars Road SE1 8NL H 81 6 Paris Garden SE1 8DJ H 82 6 Paris Garden SE1 8DJ H 83 6 Paris Garden SE1 8DJ H 80 6 Paris Garden SE1 8DJ H 77 6 Paris Garden SE1 8DJ H 78 6 Paris Garden SE1 8DJ H 79 6 Paris Garden SE1 8DJ Pg 4 6 Paris Garden SE1 8DJ Pg 5 6 Paris Garden SE1 8DJ Pg 6 6 Paris Garden SE1 8DJ Pg 3 6 Paris Garden SE1 8DJ H 84 6 Paris Garden SE1 8DJ Pg 1 6 Paris Garden SE1 8DJ Pg 2 6 Paris Garden SE1 8DJ H 67 6 Paris Garden SE1 8DJ H 68 6 Paris Garden SE1 8DJ H 69 6 Paris Garden SE1 8DJ H 66 6 Paris Garden SE1 8DJ H 63 6 Paris Garden SE1 8DJ H 64 6 Paris Garden SE1 8DJ H 65 6 Paris Garden SE1 8DJ H 74 6 Paris Garden SE1 8DJ H 75 6 Paris Garden SE1 8DJ H 76 6 Paris Garden SE1 8DJ H 73 6 Paris Garden SE1 8DJ H 70 6 Paris Garden SE1 8DJ H 71 6 Paris Garden SE1 8DJ H 72 6 Paris Garden SE1 8DJ Pg 25 6 Paris Garden SE1 8DJ Pg 26 6 Paris Garden SE1 8DJ Pg 27 6 Paris Garden SE1 8DJ

Pg 45 6 Paris Garden SE1 8DJ Pg 42 6 Paris Garden SE1 8DJ Pg 43 6 Paris Garden SE1 8DJ Pg 44 6 Paris Garden SE1 8DJ 33 Hatfields London SE1 8DJ Unit 1 240 Blackfriars Road SE1 8NW 15-25 Paris Garden London SE1 8DL Pg 77 6 Paris Garden SE1 8DJ Pg 78 6 Paris Garden SE1 8DJ Pg 0 6 Paris Garden SE1 8DJ Pro Insight Colombo Centre SE1 8DP First To Third Floors 240 Blackfriars Road SE1 8NW Fourth To Fifth Floors 240 Blackfriars Road SE1 8NW Third Floor Dominican Court SE1 8DJ Basement Ground And First Floors Dominican Court SE1 8DJ Second Floor Dominican Court SE1 8DJ Pg 67 6 Paris Garden SE1 8DJ Pg 68 6 Paris Garden SE1 8DJ Pg 69 6 Paris Garden SE1 8DJ Pg 66 6 Paris Garden SE1 8DJ Pg 63 6 Paris Garden SE1 8DJ Pg 64 6 Paris Garden SE1 8DJ Pg 65 6 Paris Garden SE1 8DJ Pg 74 6 Paris Garden SE1 8DJ Pg 75 6 Paris Garden SE1 8DJ Pg 76 6 Paris Garden SE1 8DJ Pg 73 6 Paris Garden SE1 8DJ Pg 70 6 Paris Garden SE1 8DJ Pg 71 6 Paris Garden SE1 8DJ Pg 72 6 Paris Garden SE1 8DJ Rose And Crown 47 Colombo Street SE1 8DP Prince Albert 76 Colombo Street SE1 8DP 27 Blackfriars Road SE1 8NY 19 Hatfields London SE1 8DJ Colombo Centre 34-68 Colombo Street SE1 8DP 45 Colombo Street London SE1 8EE Prince William Henry 216-219 Blackfriars Road SE1 8NL 24 Blackfriars Road London SE1 8NY 202 Blackfriars Road London SE1 8NJ 1 Paris Garden London SE1 8NU Wedge House 36 Blackfriars Road SE1 8PB 49 Colombo Street London SE1 8DP Post Office 52 Blackfriars Road SE1 8NN Flat 9 Edward Edwards House SE1 0XL 19-23 Blackfriars Road London SE1 8ER 25 Blackfriars Road London SE1 8NY Dominican Court 17 Hatfields SE1 8DJ 34 Blackfriars Road London SE1 8NZ Franciscan Court 16 Hatfields SE1 8DJ Part First Floor Chadwick Court SE1 8DJ Railway Arch 80 Scoresby Street SE1 0XN Basement Ground Floor And First Floor 26 Blackfriars Road SE1 8NY Basement To Second Floors Great Surrey House SE1 8NH Third Floor Great Surrey House SE1 8NH 23 Stamford Street London SE1 9NT Wakefield House 9-11 Stamford Street SE1 9NT Railway Arch 81 Scoresby Street SE1 0XN Railway Arch 82 Scoresby Street SE1 0XN Railway Arch 85 Scoresby Street SE1 0XN 1 Stamford Street London SE1 9NT The Mad Hatter 3-7 Stamford Street SE1 9NY 242 Blackfriars Road London SE1 9UF 25 Stamford Street London SE1 9NT Flat 3 Suthring House SE1 8NL Flat 4 Suthring House SE1 8NL Flat 5 Suthring House SE1 8NL Flat 2 Suthring House SE1 8NL Flat Above Prince William Henry SE1 8NL Second Floor And Third Floor Flat 26 Blackfriars Road SE1 8NY Flat 1 Suthring House SE1 8NL Flat 8 Edward Edwards House SE1 0XL 3 Rotherham Walk London SE1 0XE 4 Rotherham Walk London SE1 0XE 5 Rotherham Walk London SE1 0XE 2 Rotherham Walk London SE1 0XE 15 Rotherham Walk London SE1 0XE 16 Rotherham Walk London SE1 0XE 17 Rotherham Walk London SE1 0XE

Pg 24 6 Paris Garden SE1 8DJ Pg 21 6 Paris Garden SE1 8DJ Pg 22 6 Paris Garden SE1 8DJ Pg 23 6 Paris Garden SE1 8DJ Pg 32 6 Paris Garden SE1 8DJ Pg 33 6 Paris Garden SE1 8DJ Pg 34 6 Paris Garden SE1 8DJ Pg 31 6 Paris Garden SE1 8DJ Pg 28 6 Paris Garden SE1 8DJ Po 29 6 Paris Garden SE1 8DJ Pg 30 6 Paris Garden SE1 8DJ Pg 11 6 Paris Garden SE1 8DJ Pg 12 6 Paris Garden SE1 8DJ Pg 13 6 Paris Garden SE1 8DJ Pg 10 6 Paris Garden SE1 8DJ Pg 7 6 Paris Garden SE1 8DJ Pg 8 6 Paris Garden SE1 8DJ Pg 9 6 Paris Garden SE1 8DJ Pg 18 6 Paris Garden SE1 8DJ Pg 19 6 Paris Garden SE1 8DJ Pg 20 6 Paris Garden SE1 8DJ Pg 17 6 Paris Garden SE1 8DJ Pg 14 6 Paris Garden SE1 8DJ Pg 15 6 Paris Garden SE1 8DJ Pg 16 6 Paris Garden SE1 8DJ H 62 6 Paris Garden SE1 8DJ H 24 6 Paris Garden SE1 8DJ H 25 6 Paris Garden SE1 8DJ H 26 6 Paris Garden SE1 8DJ H 23 6 Paris Garden SE1 8DJ H 20 6 Paris Garden SE1 8DJ H 21 6 Paris Garden SE1 8DJ H 22 6 Paris Garden SE1 8DJ H 31 6 Paris Garden SE1 8DJ H 32 6 Paris Garden SE1 8DJ H 33 6 Paris Garden SE1 8DJ H 30 6 Paris Garden SE1 8DJ H 27 6 Paris Garden SE1 8DJ H 28 6 Paris Garden SE1 8DJ H 29 6 Paris Garden SE1 8DJ H 10 6 Paris Garden SE1 8DJ H 11 6 Paris Garden SE1 8DJ H 12 6 Paris Garden SE1 8DJ H 9 6 Paris Garden SE1 8DJ H 6 6 Paris Garden SE1 8DJ H 7 6 Paris Garden SE1 8DJ H 8 6 Paris Garden SE1 8DJ H 17 6 Paris Garden SE1 8DJ H 18 6 Paris Garden SE1 8DJ H 19 6 Paris Garden SE1 8DJ H 16 6 Paris Garden SE1 8DJ H 13 6 Paris Garden SE1 8DJ H 14 6 Paris Garden SE1 8DJ H 15 6 Paris Garden SE1 8DJ H 52 6 Paris Garden SE1 8DJ H 53 6 Paris Garden SE1 8DJ H 54 6 Paris Garden SE1 8DJ H 51 6 Paris Garden SE1 8DJ H 48 6 Paris Garden SE1 8DJ H 49 6 Paris Garden SE1 8DJ H 50 6 Paris Garden SE1 8DJ H 59 6 Paris Garden SE1 8DJ H 60 6 Paris Garden SE1 8DJ H 61 6 Paris Garden SE1 8DJ H 58 6 Paris Garden SE1 8DJ H 55 6 Paris Garden SE1 8DJ H 56 6 Paris Garden SE1 8DJ H 57 6 Paris Garden SE1 8DJ H 38 6 Paris Garden SE1 8DJ H 39 6 Paris Garden SE1 8DJ H 40 6 Paris Garden SE1 8DJ H 37 6 Paris Garden SE1 8DJ H 34 6 Paris Garden SE1 8DJ H 35 6 Paris Garden SE1 8DJ H 36 6 Paris Garden SE1 8DJ H 45 6 Paris Garden SE1 8DJ H 46 6 Paris Garden SE1 8DJ H 47 6 Paris Garden SE1 8DJ

Flat 1 Edward Edwards House SE1 0XL Flat 10 Edward Edwards House SE1 0XL Flat 12 Edward Edwards House SE1 0XL 9 Rotherham Walk London SE1 0XE 6 Rotherham Walk London SE1 0XE 7 Rotherham Walk London SE1 0XE 8 Rotherham Walk London SE1 0XE Flat 6 Quadrant House SE1 0UW Flat 7 Quadrant House SE1 0UW Flat 8 Quadrant House SE1 0UW Flat 5 Quadrant House SE1 0UW Flat 35 Quadrant House SE1 0UW Flat 36 Quadrant House SE1 0UW Flat 4 Quadrant House SE1 0UW 12 Rotherham Walk London SE1 0XE 13 Rotherham Walk London SE1 0XE 14 Rotherham Walk London SE1 0XE 11 Rotherham Walk London SE1 0XE Flat 9 Quadrant House SE1 0UW 1 Rotherham Walk London SE1 0XE 10 Rotherham Walk London SE1 0XE Flat 33 Edward Edwards House SE1 0XL Flat 35 Edward Edwards House SE1 0XL Flat 36 Edward Edwards House SE1 0XL Flat 32 Edward Edwards House SE1 0XL Flat 3 Edward Edwards House SE1 0XL Flat 30 Edward Edwards House SE1 0XL Flat 31 Edward Edwards House SE1 0XL Flat 5 Edward Edwards House SE1 0XL Flat 6 Edward Edwards House SE1 0XL Flat 7 Edward Edwards House SE1 0XL Flat 4 Edward Edwards House SE1 0XL Flat 37 Edward Edwards House SE1 0XL Flat 38 Edward Edwards House SE1 0XL Flat 39 Edward Edwards House SE1 0XL Flat 19 Edward Edwards House SE1 0XL Flat 21 Edward Edwards House SE1 0XL Flat 22 Edward Edwards House SE1 0XL Flat 18 Edward Edwards House SE1 0XL Flat 13 Edward Edwards House SE1 0XL Flat 15 Edward Edwards House SE1 0XL Flat 16 Edward Edwards House SE1 0XL Flat 27 Edward Edwards House SE1 0XL Flat 28 Edward Edwards House SE1 0XL Flat 29 Edward Edwards House SE1 0XL Flat 26 Edward Edwards House SE1 0XL Flat 23 Edward Edwards House SE1 0XL Flat 24 Edward Edwards House SE1 0XL Flat 25 Edward Edwards House SE1 0XL Living Accommodation 76 Colombo Street SE1 8DP Railway Arch 7 Chancel Street SE1 0UR Living Accommodation 47 Colombo Street SE1 8DP Living Accommodation 24 Blackfriars Road SE1 8NY Mad Hatter Hotel 3-7 Stamford Street SE1 9NY Basement And Ground Floor Dorset House SE1 9NT Fifth Floor To Eighth Floor Dorset House SE1 9NT Fourth Floor Dorset House SE1 9NT 49 Blackfriars Road London SE1 8NZ 46 Blackfriars Road London SE1 8NZ First Floor Thameslink Friars Bridge Court SE1 8NZ Part Fifth Floor Kitchen Friars Bridge Court SE1 8NZ Part Fifth Floor Friars Bridge Court SE1 8NZ Part First Floor West Friars Bridge Court SE1 8NZ Part Basement Restaurant Friars Bridge Court SE1 8NZ Eighth Floor Friars Bridge Court SE1 8NZ Part Ground Floor Connex Southern Eastern Friars Bridge Court SE1 8NZ Fifth Floor Friars Bridge Court SE1 8NZ Living Accommodation 25 Stamford Street SE1 9NT Apartment 7 235 Blackfriars Road SE1 8NW Apartment 8 235 Blackfriars Road SE1 8NW Apartment 9 235 Blackfriars Road SE1 8NW

H 44 6 Paris Garden SE1 8DJ H 41 6 Paris Garden SE1 8DJ H 42 6 Paris Garden SE1 8DJ H 43 6 Paris Garden SE1 8DJ Flat B Christchurch House SE1 0UX Flat C Christchurch House SE1 0UX Flat D Christchurch House SE1 0UX Flat A Christchurch House SE1 0UX Flat 11 1 Treveris Street SE1 0FW Flat 1 45 Dolben Street SE1 0UQ Part Basement And Part Ground Floor Christchurch House SE1 0UX Part Basement Ground Floor First Floor And Second Floor 6 Chancel Street SE1 0UX Flat 2 45 Dolben Street SE1 0UQ Flat E Christchurch House SE1 0UX Flat 10 1 Treveris Street SE1 0FW First Floor 42-44 Dolben Street SE1 0UQ Ground Floor 42-44 Dolben Street SE1 0UQ Second Floor And Third Floor 42-44 Dolben Street SE1 0UQ 8 Chancel Street London SE1 0UX Part Basement Front 42-44 Dolben Street SE1 0UQ Part Basement Rear 42-44 Dolben Street SE1 0UQ Flat 7 1 Treveris Street SE1 0FW Flat 8 1 Treveris Street SE1 0FW Flat 9 1 Treveris Street SE1 0FW Flat 6 1 Treveris Street SE1 0FW Units 1 And 2 1 Treveris Street SE1 0FW Flat 3 1 Treveris Street SE1 0FW Flat 4 1 Treveris Street SE1 0FW 1 Roupell Street Lambeth SE1 3 Roupell Street Lambeth SE1 88 Meymott Street Lambeth SE1 86 Meymott Street Lambeth SE1 84 Meymott Street Lambeth SE1 82 Meymott Street Lambeth SE1 80 Meymott Street Lambeth SE1 75 Roupbell Street Lambeth SE1 St Andrews House 73 Roupbell Street SE1 62-64 Hatfields Lambeth SE1 68 Hatfields Lambeth SE1 70 Hatfields Lambeth SE1 72 Hatfields Lambeth SE1 74 Hatfieids Lambeth SE1 76 Hatfields Lambeth SE1 78 Hatfields Lambeth SE1 80-82 Hatfields Lambeth SE1 84-86 Hatfields Lambeth SE1 18 Great Suffolk Street London SE1 0UG 18 Great Suffolk St Flat 79 SE1 0UG Flat 75, 18 Great Suffolk St Southwark SE1 0UG Flat 50 18 Great Suffolk Street SE1 0UG Flat 71 18 Great Suffolk Street 9 Colnbrook Street London SE1 6EZ 72 Roupell Street London SE1 8SS 24 Whittlesey Street London SE1 8TA 12a Theed Street London SE1 8ST Dac Beachcroft Llp 100 Fetter Lane EC4A 1BN 25 Cornwall Road London SE1 8TW 9 Theed Street London SE1 8ST 56 Roupell Street London SE1 8TB 25 Cornwall Road London SE1 8TW 25 Cornwall Road SE1 8TW Marshall House 66 Newcomen Street SE1 1YT By Email 20 Roupell Street London SE1 8SP 4 Roupell Street SE1 8SP Flat 58, 18 Great Suffolk Street London SE1 0UG 6 Whittlesey Street London SE1 8SZ 34 Roupell Street London SE1 8TB Flat 12 Block F, Peabody Estate, Duchy Street SE1 8AN 37 Roupell Street SE1 8TB London Borough Of Lambeth

Re-consultation: n/a

Consultation responses received

Internal services

Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation] Local Economy Team

Statutory and non-statutory organisations

Environment Agency Greater London Authority London Borough of Lambeth London Fire & Emergency Planning Authority London Underground Limited Natural England - London Region & South East Region Thames Water - Development Planning

Neighbours and local groups

Dac Beachcroft Llp 100 Fetter Lane EC4A 1BN Email representation Email representation Email representation Flat 12 Block F, Peabody Estate, Duchy Street SE1 8AN Flat 12 Block F, Peabody Estate, Duchy Street SE1 8AN Flat 50 18 Great Suffolk Street SE1 0UG Flat 58, 18 Great Suffolk Street London SE1 0UG Flat 75. 18 Great Suffolk St Southwark SE1 0UG Marshall House 66 Newcomen Street SE1 1YT 12a Theed Street London SE1 8ST 17 Rotherham Walk London SE1 0XE 18 Great Suffolk St Flat 79 SE1 0UG 18 Great Suffolk Street London SE1 0UG 18 Great Suffolk Street London SE1 0UG 20 Roupell Street London SE1 8SP 24 Whittlesey Street London SE1 8TA 25 Cornwall Road SE1 8TW 25 Cornwall Road London SE1 8TW 25 Cornwall Road London SE1 8TW 34 Roupell Street London SE1 8TB 37 Roupell Street SE1 8TB 4 Roupell Street SE1 8SP 56 Roupell Street London SE1 8TB 6 Whittlesey Street London SE1 8SZ 72 Roupell Street London SE1 8SS 9 Colnbrook Street London SE1 6EZ 9 Theed Street London SE1 8ST

APPENDIX 3

Human Rights Considerations

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.

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