<table>
<thead>
<tr>
<th>Item No.</th>
<th>Classification</th>
<th>Date</th>
<th>Meeting Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.1</td>
<td>Open</td>
<td>19 July 2017</td>
<td>Planning Committee</td>
</tr>
</tbody>
</table>

**Report title:**
Development Management planning application: Application 16/AP/5239 for: Full Planning Application

**Address:**
LAND AT 18 BLACKFRIARS ROAD BOUNDED BY STAMFORD STREET, PARIS GARDENS AND CHRIST CHURCH GARDENS, LONDON SE1 8NY

**Proposal:**
Redevelopment of site to create four levels of basement and the erection of six buildings ranging from five to 53 storeys plus plant (heights ranging from 23.1m AOD - 183.5m AOD) to provide; office space (Class B1); 548 room hotel (Class C1); 288 residential units (Class C3); flexible retail uses (Classes A1/A2/A3/A4); restaurant (Class A3); music venue (Class D2); storage (Class B8); new landscaping and public realm; reconfigured vehicular and pedestrian access; associated works to public highway; ancillary servicing and plant; car parking and associated works.

**Ward(s) or groups affected:**
Cathedrals

**From:**
Director of Planning

<table>
<thead>
<tr>
<th>Application Start Date</th>
<th>Application Expiry Date</th>
<th>Earliest Decision Date</th>
<th>PPA Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>16/01/2017</td>
<td>08/05/2017</td>
<td>02/03/2017</td>
<td>31/01/2018</td>
</tr>
</tbody>
</table>

**RECOMMENDATIONS**

1. That planning permission be granted subject to conditions, the applicant entering into an appropriate legal agreement and referral to the Mayor of London.

2. That if planning permission is granted it be confirmed that the environmental information has been taken into account as required by Regulation 3(4) of the Town and Country Planning (Environmental Impact Assessments) Regulations 2011.

3. That following issue of the decision it be confirmed that the Director of Planning should place a statement on the Statutory Register pursuant to Regulation 24 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2011 which contains the information required by Regulation 21, and that for the purposes of Regulation 24(1)(c) the main reasons and considerations on which the planning committee’s decision was based shall be set out as in this report.

4. That in the event that the requirements of paragraph 1 above are not met by 31 January 2018, the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 298.
BACKGROUND INFORMATION

Site location and description

5. The application site is located on the western side of Blackfriars Road, south and west of the junction with Stamford Street. It comprises a large part of the urban block, totalling approximately 0.8 hectares, with three street frontages; Blackfriars Road to the east, Stamford Street to the north and Paris Gardens to the west. To the south and east of the site lies Christchurch Gardens, within which sits the Christ Church, which is in turn bordered by Colombo Street to the south.

6. The site has largely been cleared however it previously accommodated a mix of relatively low rise office buildings and a public house. The Paper Moon Public House at 24 Blackfriars Road has been demolished and the semi derelict 18 Blackfriars Road is currently being demolished. Rennie House, Wakefield House and 19–23 Blackfriars Road are now fully demolished.

7. Immediately to the north of the site, within the same urban block, is the Mad Hatter Hotel and 1 Stamford Street, both of which are Grade II listed buildings. Christchurch Gardens with the Grade II listed drinking fountain and the Grade II listed Christ Church lie immediately to the south. The gardens are listed and designated Borough Open Land.

Surrounding area

8. The site is within the central activities zone, close to the boundary with the London Borough of Lambeth. The surrounding area is predominantly in office use with retail
and some cultural and leisure uses. Large scale residential schemes can be found along Rennie Street, South Bank Tower and along Stamford Street. Further large scale residential schemes have been approved at the northern end of Blackfriars Road at Sampson House and Ludgate House and under construction at the site known as One Blackfriars.

9. The site lies within an opportunity area, a strategic cultural area and a town centre. Under the Council’s Core Strategy and the Blackfriars Road SPD, the site falls within an area identified as being appropriate for tall buildings and this is reflected in the large buildings approved and currently under construction around Blackfriars Road. These buildings range in height from 22 storeys at the approved Friars Bridge Court on the junction of Blackfriars Road and Meymott Street to 50 storeys in height at One Blackfriars, which is currently under construction at the northern end of Blackfriars Road.

10. The buildings to the west and south west of the application site have a much lower scale with the buildings on Paris Gardens ranging in height from five storeys to 13 storeys and a more dramatic change in scale at the two storey houses along Roupell Street and Aquinas Street which are located in Conservation Areas within the London Borough of Lambeth.

11. The site has a PTAL rating of 6b and is extremely well connected to the London transport network with the various bus routes along the Blackfriars Road corridor and Stamford Street, the nearby Blackfriars National Rail Station and Southwark Underground Station further to the south of the site on Blackfriars Road. A north/south, fully segregated Cycle Superhighway exists on Blackfriars Road, which is a TfL strategic road. The application site does not contain any trees although there are some mature trees on Stamford Street and within Christ Church Gardens.

Details of proposal

12. Planning consent is sought to redevelop the site to provide housing (Class C3 Use); hotel use (C1); office space (B1); music venue (D2); restaurant (A3); and retail use (A1/A2/A3/A4).

13. The re-development would comprise six buildings that would generally be arranged around a central landscaped public space. All of the buildings would have a primary frontage onto the streets that bound the site as well as frontages onto the public space within the site itself.

14. Of the six buildings being proposed, the tallest would be the residential tower that would rise to 53 storeys and a height of 183.5m AOD. This tower would be located on the Stamford Street frontage and would mark the main entrance to the central public space. A total of 227 private homes (Class C3) would be provided within this building along with two retail units at ground and mezzanine level which would look out onto the public space and the pedestrian route to Stamford Street. Whilst defined as the residential tower, level 1 through to level 8 would provide bedrooms for the neighbouring hotel building with the main residential accommodation commencing from level 9 upwards.

15. A 34 storey (plus plant) office building (Class B1) rising to a height of 142.5m AOD
would be located on Blackfriars Road immediately to the south of The Mad Hatter. Access to the central public space would be possible at either side of this building along the boundary with Christ Church Gardens and to the rear of the Mad Hatter respectively. Two retail units would be provided at ground floor level one of which would look onto the central public space and the other would be located on the corner of the building adjacent to the Mad Hatter thereby marking the new pedestrian route into the site from Blackfriars Road and access to the top floor restaurant and terrace.

16. The residential tower would be flanked to the east by a 12 storey hotel building on the corner with Paris Gardens that would be 43.05m AOD in height. This would in turn be linked to a 19 storey 68.9m AOD high building fronting Paris Gardens providing hotel suites. A total of 548 hotel rooms and suites would be provided. A covered walkway would be provided at ground floor level, linking Paris Gardens to the central public space. Three large retail units would be provided at ground floor level fronting onto both Paris Gardens and the central public space.

17. A 15 storey block containing 61 affordable homes would be located further to the south on Paris Gardens. This building would be 51.9m AOD high and would be bounded to the rear by Christ Church Gardens. The ground floor of this building would provide three retail units.

18. The proposed music venue/office building would be located immediately adjoining the Mad Hatter public house fronting onto Stamford Street. This building would rise to 23.1m AOD in height and would accommodate a live music venue at ground and basement level (Class D2) as well as smaller scale office space (Class B1) on the upper levels.

19. All of the buildings would be linked by a four level basement that would be accessed entirely from Paris Gardens. The basement would accommodate all plant, refuse storage, cycle storage and car parking. The basement would also be the central servicing space for all commercial parts of the development, including the Mad Hatter.

20. The application has been submitted alongside an environmental impact assessment in line with the 2011 Regulations (amended in 2015).

Site layout

21. Five of the six proposed buildings would be arranged around a central public space that would have a primary pedestrian access from Stamford Street as well as access from Blackfriars Road and Paris Gardens. The sixth building, the affordable housing block, would be located on a narrow part of the site between Paris Gardens and Christ Church Gardens. All of the buildings would be linked by four levels of basement which would be accessed via two car/van lifts and two truck lifts on Paris Gardens.
22. The basements would provide all of the ancillary servicing space and back of house accommodation for the various commercial operations on the site. This would include servicing of the Mad Hatter public house and hotel, which sits outside of the application site boundary. All cycle parking, both commercial and residential, would be provided at basement level as would the residential car parking and the proposed energy centre and associated plant. Visitor cycle parking would be provided at ground floor level on-street and within the site.

23. A coach drop-off bay would be provided immediately in front of the principal hotel entrance on Stamford Street whilst four dedicated taxi bays would be located on Paris Gardens, three in front of the hotel lobby and one in front of the hotel suites lobby although this may subject to change following further transport impact assessments and discussions between the council and Transport for London. Rennie Street would be ‘stopped up’ to facilitate development as the part of Rennie Street that lies within the application site is largely redundant and a no through road.
Land use and accommodation schedule

24. The total quantum of development being proposed for the site is outlined in Table 1 whilst the residential housing mix and tenure mix is detailed in Table 2.

Table 1

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Area (GIA) m²</th>
<th>Area (GEA) m²</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential (C3)</td>
<td>28,959</td>
<td>30,562</td>
</tr>
<tr>
<td>Hotel (C1)</td>
<td>25,009</td>
<td>27,186</td>
</tr>
<tr>
<td>Office (B1)</td>
<td>33,755</td>
<td>34,606</td>
</tr>
<tr>
<td>Retail (A1-A4)</td>
<td>1,729</td>
<td>1,800</td>
</tr>
<tr>
<td>Retail (A3-A4)</td>
<td>622</td>
<td>641</td>
</tr>
<tr>
<td>Retail (A3)</td>
<td>861</td>
<td>879</td>
</tr>
<tr>
<td>Music Venue (D2)</td>
<td>783</td>
<td>941</td>
</tr>
<tr>
<td>Storage (B8)</td>
<td>11</td>
<td>13</td>
</tr>
<tr>
<td>Ancillary space</td>
<td>18,499</td>
<td>21,801</td>
</tr>
<tr>
<td>Total</td>
<td>110,288</td>
<td>118,429</td>
</tr>
</tbody>
</table>

Table 2

<table>
<thead>
<tr>
<th>Bedroom Numbers</th>
<th>Market Housing</th>
<th>Social Rented</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Units</td>
<td>Units</td>
<td>Units</td>
</tr>
<tr>
<td>Studio</td>
<td>10</td>
<td>0</td>
<td>10</td>
</tr>
<tr>
<td>1 Bed</td>
<td>77</td>
<td>20</td>
<td>97</td>
</tr>
<tr>
<td>2 Bed</td>
<td>112</td>
<td>35</td>
<td>147</td>
</tr>
<tr>
<td>3 Bed</td>
<td>23</td>
<td>6</td>
<td>29</td>
</tr>
<tr>
<td>4 Bed</td>
<td>5</td>
<td>0</td>
<td>5</td>
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<tr>
<td>Total</td>
<td>227</td>
<td>61</td>
<td>288</td>
</tr>
</tbody>
</table>

Car parking and cycle parking

25. A total of 44 car parking spaces are proposed, of which 30 would be accessible parking spaces for the mobility impaired. This equates to a residential parking level of 15%. All of the parking spaces would be located within the basement and accessed via the car lifts on Paris Gardens. The level of cycle parking being proposed is outlined in Table 3 below:
Table 3

<table>
<thead>
<tr>
<th>Use</th>
<th>Basement Cycle Parking</th>
<th>On-Street Cycle Parking</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential</td>
<td>469</td>
<td>9</td>
</tr>
<tr>
<td>Office</td>
<td>419</td>
<td>-</td>
</tr>
<tr>
<td>Music Venue</td>
<td>5</td>
<td>-</td>
</tr>
<tr>
<td>Retail</td>
<td>19</td>
<td>-</td>
</tr>
<tr>
<td>Hotel</td>
<td>28</td>
<td>-</td>
</tr>
<tr>
<td>Storage (B8)</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>General non-residential</td>
<td>-</td>
<td>110</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>941</strong></td>
<td><strong>119</strong></td>
</tr>
</tbody>
</table>

Phasing

26. The applicant intends to develop the site over five distinct phases as outlined below:

- Phase 1 – Basement
- Phase 2 – Hotel suites
- Phase 3 – Office
- Phase 4 – Hotel and residential tower
- Phase 5 – Affordable housing
- Phase 6 – Music Venue/bookend building.

Planning history

07/AP/0301

27. A planning application was received in 2007 under reference 07/AP/0301 for:

28. ‘Demolition of existing buildings and redevelopment to provide a mixed use development totalling 83,915m² Gross External Area (GEA) comprising 286 residential flats (Class C3), 25,769m² of office floorspace (Class B1), 1,170m² of retail floorspace (Class A), 562m² 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 82 cars, plus servicing and plant areas. The development consists of two towers: an office tower of 23 storeys (maximum height 105m Above Ordnance Datum), a residential tower of 42 storeys (maximum height 148m Above Ordnance Datum) and lower rise buildings of up to 7 storeys fronting Stamford Street and Paris Gardens.’

29. Whilst the council and Greater London Authority resolved to grant permission, it was called in by the Secretary of State for determination at a public inquiry and was subsequently approved subject to conditions and a section 106 agreement. The relevant pre-commencement conditions attached to this consent have been discharged and permission has been implemented. This planning permission is referred to in the applicant’s documents and this report as the ‘consented scheme’.
30. Subsequent to the planning approval outlined above, the applicant entered into a detailed pre-application enquiry process with the council for an amended scheme under reference 16/EQ/0175. This pre-application enquiry sought planning advice on a larger mixed use scheme incorporating the uses approved as part of the previously consented scheme in addition to a hotel. Whilst the land uses were considered acceptable, there were significant concerns with the detailed design and massing of the residential and hotel buildings which led to a substantial re-design prior to the submission of the current planning application.

31. This application was for an environmental impact assessment scoping opinion in relation to the current proposals on the application site. A formal opinion was issued on 21 December 2016.

**Planning history of adjoining sites**

**Application reference 08/AP/2809: 6 PARIS GARDENS - GRANTED 11/02/2009**

32. 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. This consent has been implemented and the student accommodation has been occupied; the ballet school is expected to take occupation of the lower floors shortly.


33. 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). This consent has been implemented and the hotels (Ibis and Novotel) are in use.

**Application reference 10/AP/3372: 231 - 241 BLACKFRIARS ROAD - GRANTED 15/06/2011**

34. 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.

**Application reference 11/AP/1071: KINGS REACH TOWER, STAMFORD STREET, LONDON SE1 9LS - GRANTED on 04/10/11**

35. Refurbishment and re-cladding of the tower and podium buildings, erection of six additional storeys to the tower for residential use [132.2m AOD to top of core] and
change of use of floors 11 to 30 of the tower from offices to residential [to provide a total of 173 flats]; erection of a series of extensions and additions for office use including the erection of a ten storey infill atrium building between the tower and T shaped podium, erection of a part one, part three storey roof extension to the podium building and a series of other extensions to the north, east and west of the podium building to accommodate plant and stair cores. Creation of retail (Class A1, A2, A3 and A4) space, pool and gym (Class D2) on the ground floor, provision of new and refurbished landscaping, plant and equipment, formation of new accesses, including formation of a new pedestrian route linking Stamford Street to Upper Ground, and public realm improvements. This development has recently been completed and is now known as South Bank Tower.

Application reference 12/AP/1784: 1 - 16 BLACKFRIARS ROAD - GRANTED 14/12/2012

36. 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 (known as One Blackfriars Road).

Application Reference 12/AP/3940: SAMPSON HOUSE AND LUDGATE HOUSE - GRANTED 28/03/2014

37. Demolition of existing buildings and the construction of a mixed use development totalling 144,571 sqm 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 been implemented through limited works on site; substantial demolition of Ludgate House is expected to begin later this year.

Application reference 13/AP/1403: KINGS REACH TOWER, STAMFORD STREET, LONDON SE1 9LS - GRANTED on 12/08/2013

38. The erection of an 11 storey roof extension to existing South Bank Tower (formerly King's Reach Tower), rising to a maximum of 42 storeys, comprising 36 residential units [maximum overall height 154.860m AOD]. This consent has been implemented and completed.

Application reference 15/AP/0237: WEDGE HOUSE, 32 - 40 BLACKFRIARS ROAD - GRANTED 26/08/2015

39. 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.
40. Demolition of existing office building (Class B1a) and redevelopment to provide a part 13, part 22 storey building plus basement comprising offices (Class B1a) with retail (Classes A1/A3 and A4) together with servicing, car parking and landscaping.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

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

Planning policy

42. The statutory development plans for the borough comprise the National Planning Policy Framework 2012, London Plan 2016, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007 - July). The site falls within the area covered by the Blackfriars Road SPD.

43. 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
   - Bankside, Borough and London Bridge strategic cultural area.

44. The site has a public transport accessibility level (PTAL) of 6b and is located within flood zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding.
45. 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).

46. The Waterloo and Roupell Street conservation areas lie within the London Borough of Lambeth, immediately to the west of the site.

47. The following Southwark conservation areas lie within the surrounding area:

- Old Barge House Alley - approximately 300 metres to the north west
- Kings Bench - approximately 340 metres to the south east
- Valentine Place - approximately 340 metres to the south.

48. 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:

49. **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 6: Delivering a wide choice of high quality homes
   - Section 7: Requiring good design
   - Section 8: Promoting healthy communities
   - Section 10: Meeting the challenge of climate change, flooding and coastal change
   - Section 11: Conserving and enhancing the natural environment
   - Section 12: Conserving and enhancing the historic environment.

50. **The London Plan 2016**

   - 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 2.15 Town centres
   - Policy 3.1 Ensuring equal life chances for all
   - Policy 3.3 Increasing housing supply
   - Policy 3.4 Optimising housing potential
   - Policy 3.5 Quality and design of housing developments mayors flat sizes set out
   - Policy 3.6 Children and young people’s play and informal recreation facilities
   - Policy 3.7 Large residential developments
   - Policy 3.8 Housing choice
   - Policy 3.9 Mixed and balanced communities
   - Policy 3.11 Definition of affordable housing
Policy 3.12 Affordable housing targets
Policy 3.13 Negotiating affordable housing on individual private residential and mixed use schemes
Policy 3.14 Affordable housing thresholds
Policy 3.18 Healthcare facilities
Policy 3.19 Education facilities
Policy 4.1 Developing London’s economy
Policy 4.3 Mixed use development and offices
Policy 4.5 London’s visitor infrastructure
Policy 4.6 Support for and enhancement of arts, culture, sport and entertainment
Policy 4.7 Retail and town centre development
Policy 4.12 Improving opportunities for all
Policy 5.1 Climate change mitigation
Policy 5.2 Minimising carbon dioxide emissions
Policy 5.3 Sustainable design and construction
Policy 5.5 Decentralised energy networks
Policy 5.6 Decentralised energy in development proposals
Policy 5.7 Renewable energy
Policy 5.9 Overheating and cooling
Policy 5.10 Urban greening
Policy 5.11 Green roofs and development site environs
Policy 5.12 Flood risk management
Policy 5.13 Sustainable drainage
Policy 5.15 Water use and supplies
Policy 5.18 Construction, excavation and demolition waste
Policy 5.21 Contaminated land
Policy 6.1 Strategic approach (transport)
Policy 6.2 Providing public transport capacity and safeguarding land for transport
Policy 6.3 Assessing transport capacity
Policy 6.9 Cycling
Policy 6.10 Walking
Policy 6.11 Smoothing traffic flow and tackling congestion
Policy 6.12 Road network capacity
Policy 6.13 Parking
Policy 7.1 Building London’s neighbourhoods and communities
Policy 7.2 An inclusive environment
Policy 7.3 Secured by design
Policy 7.4 Local character
Policy 7.5 Public realm
Policy 7.6 Architecture
Policy 7.7 Location and design of tall and large buildings
Policy 7.8 Heritage assets and archaeology
Policy 7.11 London View Management Framework
Policy 7.12 Implementing the London View Management Framework
Policy 7.14 Improving air quality
Policy 7.15 Reducing noise and enhancing soundscapes
Policy 7.21 Trees and woodlands
Policy 8.2 Planning obligations
Policy 8.3 Community infrastructure levy.
51. **Core Strategy 2011**

Strategic Targets Policy 1 - Achieving growth  
Strategic Targets Policy 2 - Improving places  
Strategic Policy 1 - Sustainable development  
Strategic Policy 2 - Sustainable transport  
Strategic Policy 3 - Shopping, leisure and entertainment  
Strategic Policy 5 - Providing new homes  
Strategic Policy 6 - Homes for people on different incomes  
Strategic Policy 7 - Family homes  
Strategic Policy 10 - Jobs and businesses  
Strategic Policy 11 - Open spaces and wildlife  
Strategic Policy 12 - Design and conservation  
Strategic Policy 13 - High environmental standards.

**Southwark Plan 2007 (July) - saved policies**

52. 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 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.

53. Supplementary Planning Documents

Affordable Housing SPD 2008 and draft 2011
Blackfriars Road SPD 2014
Design and Access Statements SPD 2007
Development Viability SPD 2016
Residential Design Standards SPD October 2011 with 2015 technical update
Section 106 Planning Obligations and CIL SPD 2015 and 2017 addendum
Sustainability Assessment 2007
Sustainable Design and Construction SPD 2009
Sustainable Transport Planning SPD 2009.

54. Greater London Authority Supplementary Guidance

Central Activities Zone SPG 2016
Housing SPG 2012
London View Management Framework 2012
London’s World Heritage Sites SPG 2012
Providing for Children and Young People’s Play and Informal Recreation 2008
Use of planning obligations in the funding of Crossrail 2010.

Principle of development

55. 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.

56. 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.

57. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

Opportunity area

58. The London Plan designates Bankside, Borough and London Bridge as one of four Opportunity Areas in the London South Central area.

59. The London Plan notes that this area has considerable potential for intensification and scope to develop the strengths of the area for strategic office provision as well as
housing, especially in the hinterland between Blackfriars and London bridges. Mixed leisure and culture related development should enhance its distinct offer as part of the South Bank strategic cultural area and this should include visitor accommodation.

60. Strategic Targets policy 2 of the Core Strategy underpins the London Plan and states that Southwark’s vision for Bankside, Borough and London Bridge is to continue to provide high quality office accommodation, world-class retail, tourism, cultural and entertainment facilities including the delivery of 1900 new homes, 665 affordable homes and around 25,000 new jobs by 2026.

Central activities zone and Borough and Bankside district town centre

61. The site is located within the CAZ which covers a number of central boroughs and covers London’s geographic, economic, and administrative core. Strategic targets policy 2 – Improving places of the Core Strategy states that development in the CAZ will support the continued success of London as a world-class city as well as protecting and meeting the more local needs of the residential neighbourhoods. It also states that within the CAZ there will be new homes, office space, shopping and cultural facilities, as well as improved streets and community facilities.

62. In addition, the site is part of the Borough and Bankside district town centre where saved policy 1.7 of the Southwark Plan states that within the centre, developments will be permitted providing a range of uses, including retail and services, leisure, entertainment and community, civic, cultural and tourism, residential and employment uses. Strategic policy 3 of the Core Strategy advises that the network of town centres will be maintained and that at Borough and Bankside district town centre, the council will support the provision of new shopping space.

Blackfriars Road SPD

63. The adopted Blackfriars Road SPD sets out (at paragraph 2.2.3) the emerging vision for Blackfriars Road which is:

64. “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.”

65. The Blackfriars Road SPD aspiration for the area is to have a mix of shops, offices and services. It expects opportunities to increase the amount and type of development to be maximised, especially opportunities for flexible innovative business space and town centre uses which include hotels and new homes.

66. The SPD also outlines the suitability of the northern end of Blackfriars Road as a location for tall buildings. The SPD specifically refers to the area around the junction of Blackfriars Road, Stamford Street and Southwark Street.

Bankside, Borough and London Bridge strategic cultural area

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

Conclusion on policy designations

68. The principle of a large scale development containing a mix of uses including retail, offices and cultural uses would support the role and functioning of the central activities zone and the Borough and Bankside district town centre as well as being consistent with the policies for the opportunity area. The acceptability of each of the individual uses is considered below.

Offices

69. The site falls within the CAZ, which contains London’s geographical, economic and administrative core. The London Plan does not protect office floorspace in the CAZ, it simply identifies office use as an appropriate land use in the CAZ and notes that there is capacity for 25,000 jobs in the Opportunity Area. This is further supported by the Mayoral Supplementary Planning Guidance – Central Activities Zone (2016).

70. Core Strategy Strategic Policy 10 Jobs and Businesses states that the council will increase the number of jobs in Southwark and create an environment in which businesses can thrive. The policy goes on to state that existing business floorspace would be protected and the provision of around 400,000sqm-500,000sqm of additional business floorspace would be supported over the plan period in the Bankside, Borough and London Bridge Opportunity area to help meet central London's need for office space.

Office layout
71. Saved policy 1.4 - Employment sites outside the preferred office locations and preferred industrial locations is also relevant, and states that development will be permitted provided that the proposal would not result in a net loss of floorspace in Class B use. An exception to this may be made where:

   a) the applicant can demonstrate that convincing efforts to dispose of the premises, either for continued B Class use, or for mixed uses involving B Class, including redevelopment, over a period of 24 months, have been unsuccessful; or
   b) the site or buildings would be unsuitable for re-use or redevelopment for B Class use or mixed use, having regard to physical or environmental constraints; 
   c) the site is located within a town or local centre, whereby suitable Class A or other town centre uses will be permitted in the place of Class B uses.

72. The previous office buildings have now been demolished and their combined employment floorspace figures came in at 18,714sqm (NIA). The proposed development would provide 34,606sqm (GEA) of new high quality office floorspace. This is the equivalent of 25,695 sqm (NIA) and that would support approximately 2,141 new jobs. This level of job creation is welcomed and is a significant benefit of the scheme.

73. The new offices would result in a greater quantum of employment floorspace than the previous buildings and they would be modern, high quality and more efficiently laid out and thus would be much more attractive to office users. The scale and design of the offices would result in a higher quality office environment with a greater overall employment potential than the previous buildings with the ability to attract high profile office users or perhaps a company headquarters. In order to ensure the timely delivery of the offices to meet the strategic objectives of providing employment floorspace, any permission issued should include a condition that requires the office building to be constructed in advance of the residential buildings.

    Hotel

74. The London Plan, as well as both the Core Strategy and the Saved Southwark Plan support the development of hotels within opportunity areas, town centres and strategic cultural areas. The London Plan specifically seeks approximately 40,000 additional hotel bedrooms by 2031 with a particular focus on the CAZ.

75. The Blackfriars Road SPD encourages a range of other town centre uses which include hotels. SPD2 of the SPD encourages this mixed use nature and states:

76. “We will encourage the provision of town centre uses to help enhance the commercial attractiveness of Blackfriars Road, supporting proposals for new hotels and other forms of visitor accommodation (Class C1) to ensure there is a good supply of accommodation for visitors and to contribute to a mix of uses and employment opportunities. Proposals should seek to maximise the opportunity to include activity along the lower and street level frontages.”

77. Given the site location within an opportunity area, a district town centre, strategic cultural area, the CAZ and an area with a high PTAL, the provision of a 548 bedroom hotel facility is fully supported.
**Retail**

78. The development would include new retail units (A1/A2/A3/A4) at ground floor level of all buildings with the exception of the music venue. In total, 3,212sqm (GIA) of retail floorspace is proposed and is split between various A Class uses as set out below;

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Area (GIA) m²</th>
<th>Area (GEA) m²</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retail (A1-A4)</td>
<td>1,729</td>
<td>1,800</td>
</tr>
<tr>
<td>Retail (A1-A3)</td>
<td>622</td>
<td>641</td>
</tr>
<tr>
<td>Retail (A3)</td>
<td>861</td>
<td>879</td>
</tr>
<tr>
<td>Total</td>
<td>3,212</td>
<td>3,320</td>
</tr>
</tbody>
</table>

79. The provision of new town centre uses such as retail is supported by saved Southwark Plan policy 1.7 since the site lies in a town centre. Public access would also be provided to the restaurant/terrace at the top of the office building thereby meeting the London Plan expectation that tall buildings will be publicly accessible. The retail units would activate the ground floor of the development, particularly along Paris Gardens and within the central public space. The retail units would serve the proposed increase in population and contribute to the vitality and viability of the district town centre. The site previously had limited active frontage whereas the proposal would create a much more attractive and vibrant street environment with retail opening out onto streets and the newly formed public space with opportunities to provide tables and chairs outside, encouraging visitors to stay for longer periods. The amount and scale of provision is considered to be acceptable and would help to meet the needs of residents, workers and visitors in the area

**Music venue**

80. The proposal would include the provision of a music venue (Class D2 – capacity 525 persons) equating to 783sqm (GIA) of floorspace within the ground and lower levels of the building that would flank the Mad Hatter. The provision of a music venue is supported given the site location within the strategic cultural area and accordingly is a positive aspect of the scheme.

81. At the time of writing, no end user has been secured although it is acknowledged that there is commercial interest in taking over this space. Further details would be secured by the legal agreement in relation to the level of fit out of the space. Whilst some concerns have been raised by adjoining neighbours in terms of potential for disturbance, it is considered that appropriate mitigation could be achieved by planning condition. Conditions would also be appropriate to manage concerns raised by the council’s environmental protection team on this issue.

**Housing**

82. The proposed development would provide 288 new homes which are supported by the London Plan, the saved Southwark Plan and the Core Strategy.
London Plan policy 3.3 - Increasing housing supply sets a minimum target of 27,362 additional homes to be provided in Southwark over a period from 2015-2025. A specific target of 1,900 homes is given for the opportunity area. Strategic policy 5 of the Core Strategy seeks high quality new homes in attractive environments. It states that development will provide as much housing as possible whilst also making sure that there is enough land for other types of development. The policy sets a target of 24,450 net new homes between 2011 and 2026. A key objective is to provide as much new housing as possible and create places where people would want to live.

The proposed 288 new homes would contribute towards meeting an identified housing need and accords with local, regional and national policy priorities. Issues relating to the quality of accommodation and affordable housing are discussed further below.

Conclusions on land use

The proposal involves a significant uplift of office floorspace on-site, alongside a range of acceptable town centre (retail and hotel) and cultural (music venue) uses. The provision of housing is supported at national, regional and local levels and would represent a significant and positive contribution towards housing need.

The proposed development includes a mix of uses that are considered to be appropriate for the site’s location within the CAZ, opportunity area, strategic cultural area and district town centre. As well as the retail and cultural uses, which would support the cultural and visitor functions of the area, it would provide a significant number of new homes, which is a priority of the current government as well as local and London-wide planning policies.

Environmental impact assessment

Applications where an environmental impact assessment (EIA) is required will either be mandatory or discretionary depending on whether the proposal constitutes Schedule 1 (mandatory) or Schedule 2 (discretionary) development of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The proposed development falls within Schedule 2, Category 10(b) ‘Urban Development Project’ of the EIA regulations and constitutes EIA development having regard to its potential for likely significant environmental effects.

In this case, the proposal exceeds the criteria for 'Urban development projects' as it would provide in excess of 150 dwellings and the overall area of development (in terms of floorspace) would exceed 5 hectares. Prior to the submission of the planning application, the applicant requested a ‘scoping opinion’ under Regulation 13 of the EIA Regulations to ascertain what information the local planning authority considered an environmental statement (ES) should include (ref: 16/AP/4671).

Regulation 3 of the EIA regulations precludes the granting of planning permission unless the council has first taken the ‘environmental information’ into consideration. The ‘environmental information’ means the ES, including any further information, any representations made by consultation bodies, and any other person, about the environmental effects of the development.
90. In accordance with the EIA regulations, an environmental statement (ES) comprising a non-technical summary, environmental statement and technical appendices accompanies the application.

91. Additional environmental information or ‘further information’ to support the ES was submitted in March 2017 following revisions made to the proposed development. A further round of consultation was undertaken on the ES Addendum in accordance with Regulation 22 of the EIA regulations. Information on the potential environmental impacts of the scheme and mitigation (where required) is included in the various sections of this report.

Alternatives

92. The EIA regulations requires the ES to provide information on the alternative options considered by the applicant. The ‘do nothing’ alternative would leave the application site in its current state (i.e. a vacant and cleared site). This scenario is considered in the ES to have no environmental benefits compared with the proposed redevelopment of the site.

93. The ES also describes the design evolution of the scheme which has been influenced by environmental factors, particularly the acoustic environment, daylight and sunlight and wind microclimate. Other key factors that have informed the design include the protected LVMF Views and how the development responds to heritage assets. As such, the final iteration of the scheme is the culmination of a series of design options which has taken account of the constraints and opportunities presented by the site as well as issues raised during the process.

94. Officers are satisfied that the ES has investigated alternatives for the site and that the proposed development maximises the development potential of the site whilst seeking to minimise environmental impacts. The site occupies a prominent central London location in an opportunity area and such sites are fundamental to achieving the overall regeneration of the Blackfriars Road area. To not develop the site would lead to a missed opportunity to secure a high density, mixed use scheme delivering new jobs, homes and cultural facilities in addition to significant improvements to public realm and permeability.

Cumulative impacts

95. The ES takes into account the cumulative effects of the scheme and considers the following types of impact:

- Cumulative impacts between developments, which are those effects of the development that may interact in an additive or subtractive manner with the impacts of other committed schemes that are not currently in existence, but may be by the time the development is implemented
- Interactions between impacts, where impacts in different categories as set out in the individual topic chapters may act in conjunction to either beneficial or detrimental effect.

96. In most cases the cumulative impacts of the development were limited. The low traffic generation rates limit the potential impacts of the development on air quality and
noise. Likewise, the proposed development is largely obscured by other schemes in many of the assessed views, thereby helping to reduce the impact of the scheme. The cumulative effect of the proposed development on daylight and sunlight has been demonstrated as being major adverse at several tested receptors; however, this is largely a result of the scale and proximity of neighbouring cumulative schemes as opposed the proposed scheme whose independent impacts on daylight and sunlight are outlined in paragraphs 190 - 222 below.

97. As outlined in the ES, there were no likely significant effects assessed where the incremental adverse effect of the development, when considered with cumulative schemes, would be of greater significance than if the development had been considered in isolation.

98. Interactions between impacts have also been considered and it has been concluded that after mitigation measures, no significant interactive cumulative effects are anticipated.

Conclusion on environmental impact assessment

99. A detailed assessment of the likely potential and residual impacts of the scheme is provided in the relevant sections of this report, taking into account the ES and the material planning policy considerations. In summary, officers are satisfied that the ES is adequate to enable a fully informed assessment of the environmental effects of the proposal.

Design and impact on townscape views and heritage assets

Policy context

100. The NPPF at paragraph 56 stresses the importance of good design, considering it to be a key aspect of sustainable development. Chapter 7 of the London Plan deals with design related matters. In particular, policy 7.1 sets out the design principles required for new development and policy 7.6 requires architecture to make a positive contribution to the public realm, streetscape and cityscape. Policy 7.8 asserts that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.

101. The relevant Southwark design and conservation policies are strategic policy 12 of the Core Strategy and saved policies 3.12, 3.13, 3.15, 3.16, 3.17, 3.18 and 3.20 of the Southwark Plan. These policies require the highest possible standards of design for buildings and public spaces. The principles of good urban design must be taken into account in all developments including height, scale and massing, consideration of local context including historic environment, its character, and townscape strategic and local views.

102. The Blackfriars Road SPD identifies this site as being a suitable location for tall buildings, a principle that is also supported by it's designation as an opportunity area. The SPD specifically envisages the junction of Blackfriars Road, Stamford Street and Southwark Street as being a suitable location for a cluster of tall buildings.
Site context

103. The application site is located in the CAZ and sits on the junction of Blackfriars Road and Stamford Street, one of the most prominent locations on the Blackfriars Road and within an area that is considered suitable for tall buildings. Large scale developments have taken place immediately surrounding the site including the One Blackfriars development, 240 Blackfriars Road and South Bank Tower as well as consented developments at Wedge House, Friars Bridge Court and Samson and Ludgate House.

Site layout

104. The proposal seeks to re-develop what is essentially an entire city block. The proposal retains building lines along the principal street frontages of the site with a central public realm that remains open to the boundary with the established open space at Christ Church Gardens. Four pedestrian routes into and through the site are proposed with the principal routes through the site being established from Blackfriars Road and Stamford Street which is recognises the hierarchy of streets and movement patterns/desire lines of pedestrians. Whilst all of the buildings with the exception of the music venue are tall buildings as defined under the saved Southwark Plan, it is appropriate that the tallest elements, the residential tower and the office building, are located on the main road frontages of Blackfriars Road and Stamford Street.

Tall buildings

105. Five of the six proposed buildings are considered to be tall buildings by virtue of their height exceeding 30m however the tallest elements are the residential tower on Stamford Street at 183.5m AOD (53 storeys) and the office building fronting Blackfriars Road at 142.35m AOD (34 storeys plus plant). The two towers each have a very different appearance, reflecting their uses, and have been designed by two separate architectural practices.

Stamford Street visualisation
106. The proposed towers would sit to the south of the taller elements of the cluster that have been completed (South Bank Tower); are under construction (One Blackfriars); and have been consented (Sampson House and Ludgate House). The proposed towers would consolidate the cluster of tall buildings around the junction of Blackfriars Road and Stamford Street/Southwark Street.

107. Saved policy 3.20 which requires that all tall buildings should:

i. Makes a positive contribution to the landscape; and

ii. Is located at a point of landmark significance; and

iii. Is of the highest architectural standard; and

iv. Relates well to its surroundings, particularly at street level; and

v. Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

Landscape and public realm

108. This part of Southwark is characterised by busy arterial routes overlaid with important pedestrian thoroughfares. The site is located close to the river and the important Blackfriars bridgehead, as well as important transport links like the recently completed elevated station which includes a new entrance to this mainline station from the South Bank. Quality landscaping and public realm is integral to any large scale redevelopment. It will not only create a setting for the tall buildings allowing them to ‘land’ appropriately but also an opportunity for such a development to demonstrate the benefits that can flow from expanding vertically to free up more space at street level in a congested part of the city.

109. The consented scheme included a substantial public space albeit one that was designed as a series of linked spaces including a place of arrival and a calm space removed from the busy roadways that surround the site. It was generous in proportion, took up a large proportion of the site and was designed as a local destination. That space linked up with other pedestrian routes and new developments in the area including 1 Blackfriars and Christchurch Gardens and encouraged permeability diagonally across the site.

Landscaping

110. The current proposal preserves the significant contribution to the landscape as
consented albeit in a slightly different arrangement. It remains a point of destination in the area. This new public space at the centre of the site can be accessed from Blackfriars Road, Stamford Street and Paris Gardens allowing permeability for pedestrians and is designed to complement the mature and well-established Christ Church Gardens to the south. East-west access is available round and through the commercial building as well as via a narrow lane to the rear of the Mad Hatter whilst from Paris Gardens the access is via a gap between and below the two hotel buildings. The design of this space is intended to create a setting for each of the three main parts of the development with the commercial tower, the residential tower, and the hotel forming three sides to the space. On these three sides the space is lined by active frontages (cafes and restaurants) to complement and enliven the public space.

111. The public realm of this proposal is an important aspect of the scheme. In a location which is flanked by busy arterial routes the public space would have to include mature planting especially at the centre where it would be appreciated together with Christ Church Gardens. The public space at the heart of the scheme is a bold and ambitious feature of the scheme. Its detailed design, including management and maintenance, will be important for the delivery of this vision for the site particularly given the underlying basements and the potential difficulty in achieving suitable soil depth and volumes to allow for mature planting. Therefore the detailed design of the public space including the longer term management arrangements are matters that should be reserved by condition to ensure that the permeability across the site is retained, active uses are accommodated and the hard and soft landscape proposals are delivered.

Location

112. Tall buildings are required to be located at a point of landmark significance. The Blackfriars Road SPD and Core Strategy identify this site as being suitable for tall buildings. The definition of a point of landmark significance was the subject of extensive discussion at the 2008 public inquiry when it was concluded that this is an appropriate location for a tall building at the confluence of these important routes, as well as the significance of the bridgehead and the river crossing in this location.

Architectural design

113. The proposal naturally divides into two building types, the two individual towers, and lower ‘street’ buildings. The two towers have been designed as individual elements of a composition. The taller residential tower (183.5m AOD) is designed as a series of glass cubes or blocks arranged around a narrow central ‘core’. In contrast the commercial tower (142.35m AOD) is designed as a cluster of three metal and glass geometric elements arranged in a rhomboid form and extruded vertically. Each has a striking visual language which has emerged form a thorough understanding of the site and its wider London context.

114. The residential tower is tall and slim and benefits from having narrow proportions in the round whereas the consented scheme was broad on its east/west flanks and narrow only when viewed from the north or south. The current design has a striking vertical emphasis and a confident architectural language that would ensure that it would be immediately recognisable in the skyline. The vertically arranged glass cubes or blocks that make up the design have been deliberately designed to protrude at slightly varied angles. This is intended to give the building a varied presence in the
round and open up to different views and orientations higher up. The blocks are larger at the bottom of the building and reduce in scale as they rise up the building terminating with a simple cube-like form. This reducing scale not only creates incidents and special terraces at different locations on the building but also visually emphasises its height making it appear taller and narrower. At the base of the tower the blocks are raised by two full floors to expose the glassy 'core' which also becomes the main entrance to the building. This ensures that the tower lands appropriately in its landscaped setting and establishes a recognisable presence at street level.

**Paris Gardens Visual**

115. The architectural language of the office building is principally about the three extruded forms. Each form is clad with the same principal materials but each in a slightly varied design. The glazed façade has been adapted and used either as flush-glazing, a 'pleated' or folded design, or with a deep-set rib. In this way the architectural detailing has been used to give each extrusion its own distinctive character. On the Blackfriars Road frontage the main impression of the building would be dominated by its glazed 'pleated' glass façade with louvres which would emphasise the folds and give the building a strong textured appearance. At the top of the building each extrusion is stopped at a different height to give the building a distinctive stepped silhouette and accommodates a new publicly accessible terrace and restaurant. The tri-partite arrangement of the tower helps to break up the form and give it a strong vertical emphasis. At its base the building would have a triple-height atrium which is set-in from the edge of the site and runs across the building to allow a clear visual link from the Blackfriars Road to central public space. When viewed from the central public space, the building has a number of deep-set galleries which are intended to animate the landscaped centre of the site from the upper levels.

116. The hotel use is distributed across a number of buildings which have their main
frontages on Paris Gardens. These are principally masonry buildings and start at the corner with Stamford Street as a limestone-framed and clad building. The next building along is proposed to be stone-framed with metal and glass infills while the tallest hotel building which rises to 68.9m (19 storeys) has a similar masonry frame with brick and glass infills. This use of a consistent architectural language for these buildings would relate well to the character of Paris Gardens and the listed buildings across the road and would give the hotel a recognisable architectural identity. At the ground the most important contribution that these buildings would make to the character of Paris Gardens would be the inclusion of a double-height colonnade along the full length of the hotel. This not only widens the footway significantly but also helps to relieve the impact of these substantial buildings on this narrow street.

117. At the southern end of Paris Gardens is the stepped articulated form of the affordable housing block. This building rises to 51.9m in height (15 storeys) and has been designed to take up the narrow corner of the site to the west of Christchurch Gardens. In this location it will form the main backdrop to the Grade II listed church when viewed from Blackfriars Road. It has been designed in a distinctive zig-zag plan form with a steel grid frame with glass and brick infill panels. The articulated form helps to widen the footway on Paris Gardens and to break up the façade with main entrances located at the widest points. The building is narrow in profile, generally just one flat deep, and as a consequence a majority of the units are dual aspect. It has two cores which are expressed as narrow vertical strips of glass blocks and the entire building is topped with resident’s gardens which will provide high quality communal amenity for future occupiers.

118. The final building is the smaller music venue/office building which is located on Stamford Street. This building sits adjacent to the Mad Hatter and is designed to complete this piece of historic townscape which includes two listed buildings. At 23.1m in height (six storeys) it is designed to emulate the proportions and hierarchy of its historic neighbour. It is located at the main entrance to the site from Stamford Street, covers up the exposed flank of the Mad Hatter and its frontage will activate this key route into the public space at the centre of the site.

Relationship at street level

119. In terms of its contribution to the street scene the proposal is designed to maximise the active frontages of Stamford Street, Paris Gardens and Blackfriars Road. The only areas of inactive frontage are two small lengths of Paris Gardens which provide the main vehicular access to the development. These are limited in scale and their impact has been adequately mitigated by improvements to the public realm including the widening of the footway and the double-height colonnade.

120. The most important part of the contribution to the street scene will be the public space created at the heart of the site. This is intended to be a destination space, a space that encourages permeability, and one that can be designed as an ‘urban room’. The quality of this space will rely on clear definition and activation of the edges within the space, a well conceived public realm, and a clear sense of purpose. The design for this space will include a well-defined street edge on three sides. Retail units and communal spaces have been carefully incorporated into the base of all three buildings to create active frontage on all sides of the ‘square’. Landscaping has been used to define the purpose of the space and encourage its use and sculptural elements are
proposed to act as a focus and to support its flexible function. Green landscape is not only used to give the public space a softness and tranquil feel but encourage its use and reduce the predominance of hard surfaces in the area.

121. All street frontages would be activated with entrances to buildings and views through to the public space as well as the widening of Paris Gardens which would result in a much improved pedestrian environment.

Strategic views

122. To demonstrate the architectural qualities of the scheme and its impact on the London skyline, rendered views have been prepared and submitted as part of the application. These include the same viewing positions that were presented to the public inquiry as well as the recent updates to the LVMF. The proposal will make a significant contribution to the cluster of tall buildings around the Blackfriars bridgehead identified in the Core Strategy as a suitable location for tall buildings. The earlier public inquiry devoted much of its time to the scheme’s relationship to the London skyline. At the time particular emphasis was placed on a number of key views and London prospects: the view from the Blue Bridge at St James’ Park and the views from the Palace of Westminster World Heritage Site.

View from St James’ Park

123. This is a protected LVMF townscape view 26 at the centre of the Blue Bridge in St James’ Park looking east and focuses on the lake and Duck Island in the foreground. It was considered by the Inspector when the earlier scheme was consented and in relation to this view the Inspector concluded that the earlier proposal “…would not have a harmful effect on the view”.

124. The proposed residential tower will be more prominent than the consented scheme in this view and will be visible over the Foreign and Commonwealth Office to the right of Duck Island. In this part of the view, the Shell Centre (and the recently implemented group of towers around it) as well as the London Eye are very prominent. Whilst this will become a further incursion into this view, the influence is likely to be minimal and is not considered harmful.

View from Palace of Westminster World Heritage Site

125. Views of the Palace of Westminster are also protected by the LVMF and include strategic views 27A.1 and 2 from the area between the Supreme Court and Westminster Abbey. The information submitted with the application demonstrates that this proposal will not be visible at all from these protected locations. However, the residential tower is likely to be visible in the gap between the tower of Big Ben and Portcullis House for a short length (approximately 20m) of the southern edge of Parliament Square. This visibility is incidental and very distant (more than 1 mile). Added to that any visibility of this scheme is likely to be masked by the mass of the recently consented Elizabeth House scheme in Lambeth. Accordingly, any harm is considered to be nominal and acceptable.
126. LVMF view 12A.1 (View 17) and 12A.2 (view 16) are Strategic Views of the river from a Grade II Listed bridge and one of the key river prospects. The LVMF (2012) lists Tate Modern together with St Paul's Cathedral and the Millennium Bridge as the landmarks that are visible in this view. In its Visual Management Guidance the LVMF states that development should "...safeguard the setting of landmarks (including Strategically Important Landmarks and World Heritage Sites) and, where tall, should ideally contribute to the development or consolidation of clusters of tall buildings that contribute positively to the cityscape."

127. This is a dynamic view that changes as one moves north to south across Millennium Bridge. In this view the most apparent change is the slender profile of the tall buildings that are currently proposed as opposed to the wide blocks that were approved as part of the consented scheme. Given the slender profile of the tall buildings, it is not considered that this view would be negatively impacted by the proposed development.

View of Somerset House courtyard

128. The proposed development would be visible from the furthest north-west corner of the Somerset House courtyard. The courtyard of Somerset House is fine historic set piece and one of London's best preserved spaces. Somerset House is the Grade I Listed former palace which is currently home to the Treasury and a number of high profile visitor attractions including the Courthold Gallery. The courtyard is one of its most significant features and is at the centre of a number of activities in the cultural calendar of the city. Apart from its complete sense of enclosure one of the most notable aspects of the courtyard is the elegant roofline which is punctuated by symmetrically arranged chimneys.
129. The accurate visual representations (AVRs) submitted with the application demonstrate that the top-most portion of the scheme is visible in a small area of the furthest north-west corner of the Somerset House courtyard. The area of visibility has been plotted on a drawing and is limited to the far north-west corner of the courtyard where it is visible to a similar degree as the extended Kings Reach tower, beyond which the scheme will not be visible. The applicants have provided a wireline rendering of the view where the scheme is most visible and demonstrated that the proposal recedes out of view as the viewer crosses the space. The area where the proposal is visible is away from the most significant parts of the courtyard. The view demonstrates that it will not intrude into any views in or around the central entrance route and carriage archway and most of the courtyard itself. The area where the proposal is most visible is located to the right of the entrance and in a route past the west range and chapel which currently leads to a yard. The affected area is separated from the main courtyard by a railing and a change in level. At its greatest visibility the proposal echoes the forms of the prominent chimneys, it will appear in the distant backdrop and, due to its materiality, will be less prominent that the implemented Doon Street development which is also visible from this location. It will quickly disappear from view when the viewer moves across to the centre of the courtyard and as such is not considered harmful.

130. Strategic views are principally a matter for the GLA who have been consulted on this application. The GLA have assessed the application in terms of its impacts on LVMF views as well as views from world heritage sites and from the surrounding conservation areas. Whilst the upper levels of the towers would be visible in most of these views, the GLA do not consider the incursions to be harmful. The GLA consider that the height is appropriate and that the high quality design of the proposal would positively enhance the cluster of tall buildings on Blackfriars Road and would also strengthen the area in general townscape terms. The GLA are fully supportive of the proposal in terms of scale, massing, height and impact on views and heritage assets.

**Heritage assets**

**Local views and conservation areas**

131. The site is close to a number of designated heritage assets and is also likely to affect the immediate and wider settings of a number of heritage assets in the area. Immediately adjacent to the application site are the Grade II listed numbers 1 and 3 Stamford Street as is the Grade II Listed Christ Church and gardens as well as Nos 1, 2 and 3 Paris Gardens. To the west are a number of conservation areas (CA) in Lambeth including the Roupell Street CA and the Waterloo CA centred on Aquinas Street.

132. Several viewing points have been presented in key streets of both conservation areas. These conservation areas have a consistent and well preserved historic townscape whose significance lies in the cohesive groups of brick-faced terraces of workers cottages and their relationship with the street. In the presented views, the impact of the proposal is taller but less bulky than the consented scheme. Its glassy design and materiality is consistent with the consented scheme which was considered to be appropriate as a contrast to the modest brick buildings in the foreground. In addition, the exceptional quality of design is considered to adequately mitigate against this
substantial incursion into the historic setting. To date the council has not received a formal objection to these proposals from the London Borough of Lambeth although it is noted that local groups and residents do have concerns about the potential impacts on the surrounding CA. Officers are satisfied that the design of this proposal is better in many respects, than the consented scheme and that the benefits of the proposal including the comprehensive redevelopment of the site, the substantial public space and the cultural offer that it will secure outweigh any perceived harm in the views from the CA. The views from these sensitive historic areas underscore the findings of the Inspector on the consented scheme that are equally applicable to the proposed scheme:

133. “The strong character of the [Roupell Street] conservation area would not be undermined by the appearance of further modern buildings beyond; rather, the contrast would accentuate the characteristics for which the conservation area was designated.” The Inspector went on to conclude that: “The same applies to Aquinas Street in the Waterloo Conservation Area.”

134. The views submitted with the application demonstrate this scheme’s positive contribution to the London skyline. Furthermore, the local views demonstrate that the proposal would contribute positively to the Blackfriars Road cluster which includes One Blackfriars, Kings Reach Tower and the recently consented Sampson and Ludgate scheme to create a gateway to Southwark at this important crossing. Whilst the residential tower is taller than One Blackfriars it does appear as a similar in height in many of the assessed views and is not considered to be harmful.

Listed buildings

135. The Grade II Listed Christchurch and Churchyard sit immediately to the south of the site and the gardens are bordered by mature London Plane trees which in many respects will help maintain the character and feel of the gardens, particularly in the summer months. The proposed development is not considered to be unduly harmful to these heritage assets

136. Numbers 1, 2 and 3 Paris Gardens are also Grade II Listed and it is not considered that the proposed development would have any significant adverse impact on these buildings, due to the narrowness of the existing Paris Gardens which means that no long distance views of the buildings are possible. The impact on these buildings as part of the proposed scheme is less intense than that approved previously as part of the consented scheme.

137. The Mad Hatter hotel and public house is Grade II listed and sits immediately adjacent to the application site. Some external works are required to the Mad Hatter to allow the proposed development to proceed. These works are subject to a separate planning application (17/AP/1009) and listed building consent application (17/AP/1088) which have been recommended for approval under officers’ delegated powers subject to the decision taken on the current application. The proposed works involve some external re-configuration to remove brickwork and create a bridging terrace at first floor as well as works to doors, window openings, cleaning of brickwork and removal of redundant services. All the works are considered to enhance the listed buildings and as such it is not considered that the proposed development would have a harmful impact on the Mad Hatter.
Design Review Panel

138. The scheme was reviewed by the Southwark DRP on two occasions, most recently in November 2016. The panel were generally satisfied with the direction of travel in the design, subject to a thorough analysis of its environmental impact. They felt the scheme had addressed a number of issues raised by the earlier panel especially in respect of the detailed design of the commercial and residential towers. However, they felt that the music venue building should be a special building, perhaps worthy of the attention of a young architectural practice; that further refinement was required in the detailed design of the Paris Gardens buildings; and that the environmental impact of the proposal needed to be assessed and presented to the council in full.

139. Officers are of the view that the music venue is high quality in design and plays an important role at the gateway to the site whilst respecting the architectural heritage of the Mad hatter which adjoins it to the east.

Affordable housing

Policy context

National

140. The NPPF adopted in March 2012 states that local planning authorities should set policies for affordable housing need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.

Regional

141. The regional policies and guidance relating to affordable housing are set out in the London Plan and the Mayor’s housing supplementary planning guidance (2012). The key relevant policies within the London Plan in relation to affordable housing are:

142. Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes:

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

- current and future requirements for affordable housing
- the need to encourage rather than restrain development
- the need to promote mixed and balanced communities
- the specific circumstances of individual sites
- resources available to fund affordable housing, to maximise affordable housing output and the investment criteria set by the Mayor
- the priority to be accorded to provision of affordable family housing.
144. Part B of the policy sets out that negotiation on sites should take account of their individual circumstances including development viability.

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

146. The supporting text in paragraph 3.74 repeats part C of the policy setting out that in exceptional circumstances an off-site or payment in lieu contribution may be accepted. Where a payment in lieu contribution is acceptable the text sets out that it should be ring fenced, and if appropriate ‘pooled’, to secure efficient delivery of additional affordable housing on identified sites elsewhere. These exceptional circumstances include those where, it would be possible to:

- secure a higher level of provision
- better address priority needs, especially for affordable family housing
- secure a more balanced community
- better sustain strategically important clusters of economic activities, especially in parts of CAZ.

Local

147. The local policies are saved Southwark Plan policy 4.4 - Affordable housing, and Core Strategy strategic policy 6 – Homes for people on different incomes. Further guidance on how to implement the policies is contained within the council’s adopted Affordable Housing SPD 2008 and draft Affordable Housing SPD 2011.

148. Core Strategy strategic policy 6 - Homes for people on different incomes requires as much “…affordable housing on developments of 10 or more units as is financially viable”. It also sets a minimum target of 8,558 net affordable homes between 2011 and 2026. It requires a minimum of 35% of affordable housing on developments with 10 or more units.

149. Saved Southwark Plan policy 4.4 - Affordable housing is used alongside the overarching Core Strategy policy 6. Parts iv) and vi) of the policy require that:

iv). the affordable housing provided must be an appropriate mix of dwelling type and size to meet the identified needs of the borough
vi). A tenure mix of 70:30 social rented: intermediate housing ratio for the central activities zone.

150. The council’s adopted Affordable Housing SPD 2008 (section 3.6) together with the draft Affordable Housing SPD 2011 (section 6.3) clarifies the Southwark Plan and Core Strategy policy framework and sets out the approach in relation to securing the maximum level of affordable housing from developments. Specifically, it sets out the
sequential tests relating to the delivery of affordable housing as:

- **On site provision:** All housing, including affordable housing should be located on the development site.
- **Off site provision:** In exceptional circumstances, where affordable housing cannot be provided on site or where it can be demonstrated that significant benefits will be gained by providing units in a different location in the local area, the affordable housing can be provided on another site.
- **In lieu payment:** In very exceptional circumstances where it is accepted that affordable housing cannot be provided on-site or off-site, a payment towards the delivery of affordable housing will be required.

151. It is therefore expected that the applicant show that the steps as set out above are followed in order to demonstrate that exceptional circumstances exist sufficient to justify the provision of off-site affordable housing to supplement the on-site offer. The SPDs make it clear that a financial appraisal must be submitted to justify any off-site provision or in lieu contribution. As set out in paragraph 6.3.9 of the 2011 SPD, the appraisal must justify that at least as much affordable housing is being provided as would have been provided if the minimum 35% affordable housing requirement were achieved on-site. The requirement for a financial appraisal for any application which would have a requirement for affordable housing is further established under the 2016 Development Viability SPD.

152. In line with the SPDs, a financial appraisal was submitted to allow an assessment of the maximum level of affordable housing that could be supported by the development. The appraisal was reviewed by GVA on behalf of the council. Following the review of the appraisal and the assessment of a number of options testing affordable housing delivery, it has been concluded that based on the development plan as a whole, the best approach is for affordable housing to be provided on-site, with the balance made up from off-site affordable housing. This is discussed in detail below.

**Affordable offer**

153. The applicant seeks to meet the requirement to provide 35% affordable housing by providing a combination of on-site and off-site affordable housing. The proposed development would provide a total of 917 habitable rooms. As such, the 35% affordable housing requirement for this site is 321 habitable rooms. The development would provide 61 affordable homes on-site which equates to 224 affordable habitable rooms or a 24% provision. The on-site affordable homes would be social rented.

154. The applicant is also proposing to deliver 35 affordable homes off-site. These would be split between affordable rent (13 units) and intermediate (22 units). This would equate to a further 113 habitable rooms. An off-site development has been identified at Amelia Street that is currently under construction and the applicant proposes to fund conversion of 35 of the private units at this site to affordable housing. The scheme is due for completion in June 2018. The applicant is also proposing to make an in lieu payment of £1.6 million which would go towards the delivery of affordable housing. The total affordable housing provision is detailed in the table below;
Table 5

<table>
<thead>
<tr>
<th></th>
<th>Social Rent</th>
<th>Affordable Rent</th>
<th>Intermediate</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>On site</td>
<td>Off site</td>
<td>On site</td>
<td>Off site</td>
</tr>
<tr>
<td>1 Bed</td>
<td>20</td>
<td>4</td>
<td>2</td>
<td>20 6</td>
</tr>
<tr>
<td>2 Bed</td>
<td>35</td>
<td>2</td>
<td>20</td>
<td>35 22</td>
</tr>
<tr>
<td>3 Bed</td>
<td>6</td>
<td>7</td>
<td>0</td>
<td>6 7</td>
</tr>
<tr>
<td>Total Units</td>
<td>61</td>
<td>13</td>
<td>22</td>
<td>61 35</td>
</tr>
<tr>
<td>Total Habitable Rooms</td>
<td>224</td>
<td>64</td>
<td>49</td>
<td>224 113</td>
</tr>
</tbody>
</table>

On a habitable room basis, the total affordable housing provision would work out at 37% with an 85:15 split between social/affordable rent and intermediate. It is noted that this is not strictly policy compliant, but this mix does have several advantages. Providing affordable intermediate accommodation within the Bankside area raises issues of affordability due to the high market values of the units. Delivering the intermediate housing in Amelia Street would result in units which are more affordable to those in housing need. The delivery of a higher proportion of social rented housing in Bankside is of particular benefit in terms of maintaining a mixed community in an area where market housing is out of reach of most Southwark residents. On this basis the affordable housing provision would be in excess of the Councils minimum 35% requirement.

Typical on-site affordable housing layout

156. However, in determining whether the affordable housing provision is acceptable, two
key issues need to be addressed. Firstly, whether the provision of affordable housing off-site is justified in this case and secondly, whether the amount of affordable housing being provided is the maximum that the scheme can support whilst remaining viable and deliverable.

The justification for providing affordable housing off-site

157. The NPPF, London Plan and local policies all set out that in exceptional circumstances (the local policy refers to “very exceptional” circumstances) the provision of off-site affordable housing may be acceptable in lieu of on-site affordable housing.

158. The application site at 18 Blackfriars has some of the highest land and development values in the borough. Housing is being provided in two separate buildings with one providing market housing and the other providing affordable housing. The market housing tower would be located on the Stamford Street frontage and would be the tallest element of the development. The affordable housing block would be located further to the south on the Paris Gardens frontage. Both residential buildings are considered to be at the maximum scale and massing that could be considered appropriate on this site. As such there is no reasonable expectation that the affordable housing block could be increased in height to provide more units.

159. For additional affordable housing to be provided on site, affordable homes would need to be incorporated into the market housing tower fronting Stamford Street. This option would require an additional core to be provided to serve the affordable units. This is a space intensive solution that would result in a substantial area of each floor being taken up by service and circulation space and would reduce the overall number of flats on site. The provision of additional on-site affordable housing would thereby reduce the efficiency of the site and the number of homes capable of being provided. A reduced number of market homes on the site would impact on the ability to fund the affordable housing.

Affordable housing block
160. Allowing the balance of affordable housing to be provided off-site would enable the residential buildings to proceed with single tenure cores and efficient floor layouts that could maximise the residential quantum on site. This creates a more viable development which ultimately increases the amount of affordable housing that the scheme can support. More affordable housing can be delivered by incorporating an element of off-site housing than would be possible if all of the affordable housing requirement were incorporated on-site. This satisfies the test in London Plan policy 3.12 that an element of off-site provision secures a higher level of overall provision of affordable housing.

161. Another benefit of the off-site affordable housing is that the Amelia Street site that has already been identified is at an advanced stage in the construction programme and so has the potential for the early delivery of affordable housing, around June 2018. The applicant is in advanced negotiations with Family Mosaic housing association that are delivering that scheme and have agreed terms for securing the affordable housing. However, if the proposal to provide affordable housing at the Amelia Street site fall through then the applicant would need to undertake a site search in line with the council’s cascade system set out in the Affordable Housing SPD and under terms that would be agreed with the applicant as part of the section 106 agreement.

Conclusions on affordable housing

162. It is recommended that, the provision of 61 on site social rented homes (24% provision) alongside 35 off-site homes (13%) and an in lieu payment of £1.6 million is appropriate, and will maximise the amount of affordable housing the development can provide resulting in an overall provision of 37%. Following negotiations relating to the viability appraisal, the application was amended to convert all the on-site affordable units to social rent which have a lower capital value to the developer; this, and the additional in lieu payment of £1.6 million recognises the conclusions of the council’s assessment that the development could support additional affordable housing. The off-site affordable proposal at Amelia Street is well underway and would ensure the early delivery of affordable housing in connection with the proposed development. Furthermore, the provision of 61 social rented homes on site within the Bankside area is a positive aspect of the proposal.

163. The affordable housing offer of 37% plus an in lieu payment of £1.6 million reflects the viability of the scheme and GVA, working on behalf of the council, have confirmed that this is a reasonable offer. In the event that the off-site delivery at Amelia Street did not proceed then the applicant would be required to undertake a comprehensive site search to identify alternative sites to provide the quantum of off site affordable housing that has been agreed above. In the event that the site search failed to identify suitable sites then a further in lieu payment would only be appropriate once all alternative options had been exhausted and this would be subject to a further financial viability review.

Housing mix

164. Strategic policy 7 of the Core Strategy expects developments to provide at least 60% two or more bedrooms and in this area at the northern end of Blackfriars Road at least 10%of units to have 3 or more bedrooms. A maximum of 5% of units may be studios
and only for private housing. At least 10% of the units should be suitable for wheelchair users. The proposed housing mix is fully compliant with the development plan and is detailed below;

Table 6

<table>
<thead>
<tr>
<th>No. of Bedrooms</th>
<th>Total Units (number)</th>
<th>Total Units (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>10</td>
<td>3</td>
</tr>
<tr>
<td>1 Bed</td>
<td>97</td>
<td>34</td>
</tr>
<tr>
<td>2 Bed</td>
<td>147</td>
<td>51</td>
</tr>
<tr>
<td>3 Bed</td>
<td>29</td>
<td>10</td>
</tr>
<tr>
<td>4 Bed</td>
<td>5</td>
<td>2</td>
</tr>
<tr>
<td>Total</td>
<td>288</td>
<td>-</td>
</tr>
</tbody>
</table>

Density

165. 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 development 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. 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.

166. The development as a whole would have a density of 4,842 habitable rooms per hectare. Since the maximum upper limit of 1100hrh would be significantly exceeded, the development would need to demonstrate that it would provide exemplary accommodation to the highest design standards. If it can be demonstrated that an excellent standard of accommodation would be provided, and the response to context and impact on local services and amenity to existing occupiers is acceptable, then it is considered that the high density in this opportunity area location would not raise any issues to warrant withholding permission.

167. As previously mentioned, the site has been identified as being suitable for tall buildings and this principle was established as part of the previous consent. High densities can be a consequence of redeveloping sites with tall buildings as the increase in floorspace vertically significantly exceeds what would be possible by redeveloping a site with low rise buildings. In gauging whether or not it is acceptable for a development to significantly exceed the recommended density levels officers must give weight to the location, public transport availability, quality of design, quality of public spaces, standard of accommodation and other benefits that may follow from the development such as employment.

168. There are a number of high quality and high density schemes approved in the area, most notably the redevelopment of 185 Park Street; Sampson House and Ludgate House; and the One Blackfriars development. The principle of a high density on the
site is considered appropriate given the local context and location of the site within the CAZ and an opportunity area that has the highest level of public transport availability. Furthermore, the proposal is high quality in design, would provide a significant uplift in employment floorspace and would provide a high quality public realm. Furthermore, the impacts on the local area, including amenity impacts to neighbouring buildings/occupiers are not so adverse to conclude that the scheme would be considered an overdevelopment of the site. Amenity impacts are discussed in more detail later in this report. The accommodation quality will be discussed further below.

Wheelchair housing

169. A total of 30 units would be provided that would be suitable for wheelchair user; 23 of these units would be market units and seven would be affordable units. This meets the policy requirement of 10%. The exact units and level of fit out would be secured in the section 106 agreement.

Quality of accommodation

Unit size

170. Saved policy 4.2 of the Southwark Plan advises that planning permission will be granted provided the proposal achieves good quality living conditions. The adopted standards in relation to internal layout are set out in the adopted Residential Design Standards SPD 2011 (including 2015 Technical Update).

171. The following table sets out the minimum flat size requirements as set out in the Residential Design Standards 2011, and also the flat sizes that would be achieved:

<table>
<thead>
<tr>
<th>Unit Type</th>
<th>SPD (sqm)</th>
<th>Size Range (sqm)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>36</td>
<td>36 - 38</td>
</tr>
<tr>
<td>1 Bed (flat)</td>
<td>50</td>
<td>50 - 59</td>
</tr>
<tr>
<td>2 Bed (flat)</td>
<td>61-66</td>
<td>62 - 85</td>
</tr>
<tr>
<td>3 Bed (flat)</td>
<td>74-85</td>
<td>74 - 120</td>
</tr>
<tr>
<td>4 Bed (flat)</td>
<td>90-95</td>
<td>120-397</td>
</tr>
</tbody>
</table>

172. The flat sizes meet and in most cases significantly exceed the standards as set out in the SPD. In terms of aspect, 68% of the units would be dual aspect and of the 93 units (32%) which are single aspect, none are north facing and all single aspect units enjoy east, south or west aspects which is positive. Space has been allocated for storage and all kitchens enjoy natural light and ventilation. Overall, it is therefore considered that the flat sizes and layouts are acceptable, and would provide for a good standard of internal amenity.
Internal daylight

173. A daylight and sunlight report based on the Building Research Establishment (BRE) guidance has been submitted which considers light to the proposed dwellings using the average daylight factor (ADF). ADF determines the natural internal light or daylight appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. This also adopts an ADF of 2% for shared open plan living room/kitchens/dining.

174. All of the habitable rooms within the residential tower meet or exceed the recommended average daylight factor (ADF) and daylight distribution for the room type. In the affordable housing block, 84% of all tested rooms achieve the recommended ADF and 91% meet the daylight distribution requirements.

175. The rooms that do not meet the recommended ADF would achieve levels ranging from 1.6% for the sole affected living/kitchen/diner, 1% to 1.4% for living rooms, 0.6% to 1.7% for kitchens and 0.6% to 0.9% for bedrooms. The most affected units are on the lower levels of the affordable block.

176. The failure to meet the BRE recommended daylight level in some of the affordable units is noted, and this is a less positive aspect of the proposal. However, the shortfalls are limited and in the context of the development as a whole and the quality of accommodation with good quality daylight to almost all the units within the scheme this shortfall is, on balance, considered acceptable.
Overlooking

177. The western face of the residential tower and the hotel building has a separation distance of just 7m however this is only the case on a single floor (level 9 on the applicant’s drawings) with all floors above this having open aspects in all directions with the closest buildings being the office building which is 26 metres away from the eastern facade of the residential tower and the hotel suites building which is approximately 22 metres away. As such the dwellings in the residential tower would not be overlooked by any parts of the proposed development. The affordable housing block would not be overlooked by any of the buildings within the site. It is noted that the hotel suites building is close at 4 metres however there would be no direct overlooking. The closest windows of the hotel suites building to the affordable housing block could be made obscure glazed to avoid direct overlooking.

Amenity space

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

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

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

180. All units, with the exception of the studios, would have access to private amenity space as detailed in the table below:

Table 8

<table>
<thead>
<tr>
<th>No of Beds</th>
<th>No of Units</th>
<th>Amenity Space (sqm)</th>
<th>Amenity Shortfall (sqm)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>10</td>
<td>0</td>
<td>100</td>
</tr>
<tr>
<td>1 Bed</td>
<td>97</td>
<td>3 - 10</td>
<td>456</td>
</tr>
<tr>
<td>2 Bed</td>
<td>147</td>
<td>6 - 10</td>
<td>113</td>
</tr>
<tr>
<td>3 Bed</td>
<td>29</td>
<td>8 - 10</td>
<td>6</td>
</tr>
<tr>
<td>4 Bed</td>
<td>5</td>
<td>10</td>
<td>0</td>
</tr>
<tr>
<td>Total</td>
<td>288</td>
<td></td>
<td>675</td>
</tr>
</tbody>
</table>
181. The biggest shortfalls are on units with less than three bedrooms. All but three of the three bedroom units and all of the four bedroom units would have policy compliant private amenity space of 10sqm. In all cases the private amenity space shortfalls have been accumulated and will be provided as part of the communal amenity space.

Communal amenity space

182. In terms of communal amenity for the residential tower, this would be limited to the roof terraces accessed from the residents lounge. The lounge itself, whilst a positive benefit for residents of the tower, would not contribute towards the communal amenity space which should be outdoor space. Under the SPD guidelines the 50sqm communal amenity space requirement for the residential tower along with the 561sqm shortfall in private amenity space can be dealt with by way of a financial contribution of £205 per sqm of amenity space or £115,005.

183. On the affordable block there would be a roof garden providing approximately 225sqm of communal amenity space (not including play space) and this would comfortably provide the 50sqm requirement as well as the 114sqm shortfall in the private amenity space.

Children's play space

184. In line with the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG the development would be required to provide 610sqm of children's play space broken down between the various age groups as detailed below;

Table 9

<table>
<thead>
<tr>
<th>Age Group</th>
<th>Play Space Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under 5</td>
<td>360</td>
</tr>
<tr>
<td>5 to 11</td>
<td>160</td>
</tr>
<tr>
<td>12+</td>
<td>90</td>
</tr>
<tr>
<td>Total</td>
<td>610</td>
</tr>
</tbody>
</table>

185. The affordable housing block provides 115sqm of play space that would be suitable for under 5's and there would be a defined, equipped play space within the central public realm of 579sqm which would be suitable for under 5's (supervised) and the 5 - 11 year age group. No provision is made for the 12+ age group and as such a financial contribution of £13,590 would be required in line with the council's SPD.

Conclusion on quality of accommodation

186. The proposed development would provide well lit and well ventilated homes that meet the space requirements of the residential design standards. Excellent communal amenity space is provided for the affordable housing block, including play space for the under 5’s age group and this is welcomed. Whilst it is noted that some units in the market residential tower do not meet the minimum requirement, this is largely because of the design concept for the building and likewise it would be unable to provide the communal amenity space requirement due to the slender design of the tower and the reduced ability to provide roof terraces.
Impact of proposed development on amenity of adjoining occupiers and surrounding area

187. Strategic policy 13 of the Core Strategy sets high environmental standards and requires developments to avoid amenity and environmental problems that affect how we enjoy the environment. Saved policy 3.2 of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Furthermore, there is a requirement in Saved policy 3.1 to ensure that development proposals will not cause material adverse effects on the environment and quality of life.

188. A development of the size and scale proposed will clearly have potential significant impacts on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site. The proposal has required an EIA in order to ascertain the likely associated environmental impacts and how these impacts can be mitigated. The accompanying environmental statement (ES) and addendum deals with the substantive environmental issues. An assessment then needs to be made as to whether the residual impacts, following mitigation, would amount to such significant harm as to justify the refusal of planning permission.

Overlooking

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

Daylight

190. A daylight and sunlight report has been submitted as part of the environmental statement. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.

191. The BRE guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within an area of modern high rise buildings, a higher degree of obstruction may be unavoidable to match the height and proportion of existing buildings. This area of Blackfriars Road has been identified as an area where tall buildings are appropriate and there are existing buildings with heights of 50 storeys (One Blackfriars), 36 storeys (South Bank Tower) and 20 storeys (240 Blackfriars Road), within close proximity to the site.

192. 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. In terms of the ES, the level of impact on loss of VSC is quantified as follows;

Table 10

<table>
<thead>
<tr>
<th>Reduction in VSC</th>
<th>Level of impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 – 20%</td>
<td>Negligible</td>
</tr>
<tr>
<td>20 – 29.99%</td>
<td>Minor</td>
</tr>
<tr>
<td>30 – 39.99%</td>
<td>Moderate</td>
</tr>
<tr>
<td>40% +</td>
<td>Major</td>
</tr>
</tbody>
</table>

193. The second method is the no sky line (NSL) or daylight distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the no sky line between the existing and proposed situation. It advises that if there is a reduction of 20% in the area of sky visibility, daylight may be affected.

194. The ES considers the impact on the following neighbouring buildings:

- 49 Columbo Street
- Rennie Court
- Dorset House
- 47 Columbo Street
- 231 - 232 Blackfriars Road
- 6 Paris Gardens
- 1 - 20 Hopton Gardens
- 1 - 87 River Court
- Quadrant House
- Kings Reach Tower (South Bank Tower)
- 3-7 Stamford Street.

195. The daylight report has considered a large number of rooms around the site. It assessed 1,560 residential windows serving 811 rooms across 14 buildings for daylight amenity. Of the 1,560 windows assessed 1,347 (86%) would satisfy the BRE recommended levels for VSC. Of the 811 rooms assessed, 773 (95%) would meet the BRE standards for NSL. The buildings at 1-20 Hopton Gardens, Quadrant House and Kings Reach/South Bank Tower would be unaffected by the proposal in terms of daylight. The tables below outline the general results in terms of the loss of VSC and NSL that would be experienced by the remaining buildings and a more localised assessment of the affected properties is detailed below:
Table 11

<table>
<thead>
<tr>
<th>Property</th>
<th>No. of window s tested</th>
<th>No. retaining at least 80% of their baseline value</th>
<th>No. with minor adverse impact of up to 30% reduction in VSC</th>
<th>No. with moderate adverse impact of between 30%-40% reduction in VSC</th>
<th>No. with major adverse impact of over 40% reduction in VSC</th>
</tr>
</thead>
<tbody>
<tr>
<td>49 Columbo Street</td>
<td>30</td>
<td>11</td>
<td>0</td>
<td>11</td>
<td>8</td>
</tr>
<tr>
<td>Rennie Court</td>
<td>268</td>
<td>182</td>
<td>25</td>
<td>19</td>
<td>42</td>
</tr>
<tr>
<td>Dorset House</td>
<td>10</td>
<td>8</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>47 Columbo Street</td>
<td>16</td>
<td>10</td>
<td>5</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>231 - 232 Blackfriars Road</td>
<td>26</td>
<td>11</td>
<td>7</td>
<td>2</td>
<td>6</td>
</tr>
<tr>
<td>6 Paris Gardens</td>
<td>159</td>
<td>135</td>
<td>23</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>1 - 87 River Court</td>
<td>284</td>
<td>223</td>
<td>30</td>
<td>6</td>
<td>25</td>
</tr>
</tbody>
</table>

Table 12

<table>
<thead>
<tr>
<th>Property</th>
<th>No. of rooms tested</th>
<th>No. retaining at least 80% of their baseline NSL value</th>
<th>No. with minor adverse impact of up to 30% reduction in NSL</th>
<th>No. with moderate adverse impact of between 30%-40% reduction in NSL</th>
<th>No. with major adverse impact of over 40% reduction in NSL</th>
</tr>
</thead>
<tbody>
<tr>
<td>49 Columbo Street</td>
<td>11</td>
<td>9</td>
<td>0</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Rennie Court</td>
<td>200</td>
<td>187</td>
<td>5</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>Dorset House</td>
<td>4</td>
<td>3</td>
<td>0</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>47 Columbo Street</td>
<td>7</td>
<td>7</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>231 - 232 Blackfriars Road</td>
<td>10</td>
<td>10</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>6 Paris Gardens</td>
<td>120</td>
<td>114</td>
<td>2</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>1 - 87 River Court</td>
<td>204</td>
<td>188</td>
<td>8</td>
<td>4</td>
<td>4</td>
</tr>
</tbody>
</table>
49 Colombo Street

196. There are a total of 26 rooms and 30 windows in this building that have been assessed. In terms of the 30 windows assessed, 11 would satisfy BRE criteria in relation to VSC. The remaining 19 windows would lose more than 20% VSC with 11 windows experiencing a 30 - 40% reduction. Eight windows would experience a loss of VSC in excess of 40% with losses ranging from 57% - 63% and residual VSC values of 7.4 - 9.5. It should be noted that the most affected rooms are bedrooms.

197. In terms of NSL, nine of the 11 rooms would satisfy the BRE criteria. Two rooms would experience a reduction in excess of 20% with these rooms serving a kitchen (49% reduction) and bedroom (37% reduction). Whilst there are a number of windows that will lose more than 20% VSC it is noted that all but two rooms would pass the NSL test and as such the impact of the development on these properties is considered to be moderate adverse and acceptable given the highly urbanised location.

Rennie Court

198. There are a total of 200 rooms and 268 windows in this building that have been assessed. In terms of the 268 windows assessed, 182 would satisfy BRE criteria in relation to VSC. The remaining 86 windows would lose more than 20% VSC with 25 experiencing a 20% - 30% reduction and 19 windows experiencing a 30 - 40% reduction. A total of 42 windows would experience a loss of VSC in excess of 40% and this is broken down as follows;

<table>
<thead>
<tr>
<th>Reduction</th>
<th>No. of windows affected</th>
</tr>
</thead>
<tbody>
<tr>
<td>40% - 50%</td>
<td>21</td>
</tr>
<tr>
<td>50% - 60%</td>
<td>8</td>
</tr>
<tr>
<td>60% - 70%</td>
<td>4</td>
</tr>
<tr>
<td>70% - 80%</td>
<td>3</td>
</tr>
<tr>
<td>80% - 90%</td>
<td>4</td>
</tr>
<tr>
<td>&gt;90%</td>
<td>2</td>
</tr>
</tbody>
</table>

199. In terms of NSL, 187 of the 200 rooms would satisfy the BRE criteria. Five rooms would experience a 20% - 30% reduction; four would experience a 30% - 40% reduction and the remaining four rooms would experience reductions in excess of 40%. Whilst there are a number of windows that will lose more than 20% VSC, the general VSC compliance is at 68% and it is noted that 94% of rooms would meet the BRE guidelines in terms of NSL. It is acknowledged that whilst there are some significant impacts on VSC, the overall impact in terms of daylight taking into account daylight distribution (NSL) is acceptable on balance within this central London location. Additionally, many of the windows that have a greater percentage loss in VSC have existing low VSC levels and as such any change can result in a disproportionate percentage change.

Dorset House

200. Two of the ten windows assessed at this property would fail to meet the BRE
guidelines and would experience a loss of VSC in excess of 40%. Both of these windows serve the same ground floor room and it should be noted that this room is served by another three windows that will be unaffected in terms of VSC. Additionally, three of the four rooms tested for NSL meet the BRE guidelines with one room experiencing a 38% loss of NSL which is considered to be a minor impact overall.

47 Colombo Street

201. Six of the 10 windows assessed at this property would fall below the BRE guidelines in terms of VSC with five of the windows experiencing a 20% - 30% reduction in VSC albeit with residual VSC in excess of 18%. One window experiences a loss of VSC in excess of 40% however all rooms are fully compliant in terms of NSL.

231 - 232 Blackfriars Road

202. 15 of the 26 windows assessed at this property would experience a loss of more than 20% VSC with seven windows experiencing a loss of between 20% - 30%; two experiencing a loss of between 30% - 40% and six with losses in excess of 40%. In this instance however, all 10 rooms assessed for NSL comply with the BRE guidelines by retaining at least 80% of their previous value.

6 Paris Gardens

203. There are a total of 120 rooms and 159 windows in this building that have been assessed. In terms of the 159 windows assessed, 135 would satisfy BRE criteria in relation to VSC. The remaining 24 windows would lose more than 20% VSC with 23 experiencing a 20% - 30% reduction in VSC and one experiencing a 30 - 40% reduction. It should be noted that the most affected window would experience a loss of 30.1% VSC which is just marginally above the 20% - 30% loss and as such the impact on VSC is considered acceptable on balance.

204. In terms of NSL, 114 of the 120 rooms that have been assessed would meet the BRE guidelines. Two rooms would experience reductions of between 20% - 30%, one between 30% - 40% and three would have NSL reductions in excess of 40% with losses only marginally above 40% (40.2% - 42.5%). The overall impact on 6 Paris Gardens is considered to be acceptable given the high proportion of windows passing the VSC test and the central London location.

1 - 87 River Court

205. There are a total of 204 rooms and 284 windows in this building that have been assessed. In terms of the 284 windows assessed, 223 would satisfy BRE criteria in relation to VSC. The remaining 61 windows would lose more than 20% VSC with 30 experiencing a 20% - 30% reduction and 6 windows experiencing a 30-40% reduction. A total of 25 windows would experience a loss of VSC in excess of 40% and this is broken down as follows:
Table 14

<table>
<thead>
<tr>
<th>Reduction</th>
<th>No. of windows affected</th>
</tr>
</thead>
<tbody>
<tr>
<td>40% - 50%</td>
<td>7</td>
</tr>
<tr>
<td>50% - 60%</td>
<td>2</td>
</tr>
<tr>
<td>60% - 70%</td>
<td>5</td>
</tr>
<tr>
<td>70% - 80%</td>
<td>6</td>
</tr>
<tr>
<td>80% - 90%</td>
<td>3</td>
</tr>
<tr>
<td>&gt;90%</td>
<td>2</td>
</tr>
</tbody>
</table>

206. It is noted that there are two windows that would experience a 100% loss in VSC however these windows have very low VSC to begin with at 0.2% and 0.3%. The remaining losses are also from low existing VSC levels. As such the small real terms reduction in VSC generates a disproportionate percentage figure.

207. In terms of NSL, 188 of the 204 rooms would satisfy the BRE criteria. Eight rooms would experience a 20% - 30% reduction; four would experience a 30% - 40% reduction and the remaining four rooms would experience reductions in excess of 40%. Whilst there are a number of windows that will lose more than 20% VSC, the general VSC compliance is at 79% and it is noted that 94% of rooms would meet the BRE guidelines in terms of NSL. It is acknowledged that whilst there are some significant impacts on VSC, the overall impact in terms of daylight taking into account NSL is acceptable on balance within this central London location.

One Blackfriars

208. The One Blackfriars development sits to the north of the application site and is currently under construction. As such, the daylight impacts of the proposed development on the dwellings at One Blackfriars have been assessed using average daylight factor (ADF). This 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. On this basis, using ADF to assess the impact on One Blackfriars is acceptable.

209. A total of 863 rooms have been assessed with 793 (92%) meeting the BRE guidelines with regards to ADF and 835 of 863 rooms (97%) meet the BRE guidelines with regards to NSL. The level of impact on the One Blackfriars development is therefore considered to be minor in nature.

Christ Church and the Mad Hatter Hotel

210. Christ Church and the Mad Hatter Hotel are non residential buildings to which the BRE guidelines do not apply. Nonetheless, the applicant has undertaken an assessment of these two buildings, using the same VSC criteria applied to residential properties. The results indicate that Christ Church would experience notable impacts to many windows however the ES notes that the main hall of the church would continue to have BRE compliant daylight distribution and in this respect the impact is considered acceptable.
on balance.

211. The Mad Hatter would experience a more notable impact, with all 28 windows experiencing major changes in terms of daylight. However, as a hotel these changes are considered acceptable and would broadly mirror the impact from the consented scheme.

Conclusions on daylight

212. The results of the daylight assessment do reveal that there would be a number of rooms and windows that would not meet the relevant daylighting standards of the BRE, with those flats at Rennie Court and River Court particularly affected. The ES has categorised losses of 20 - 29.9% VSC as minor adverse, 30 - 39.9% VSC as moderate adverse and any losses exceeding 40% VSC as major adverse. In this respect there are 56 residential windows that would experience a loss of more than 40% VSC and officers agree that this would be a major adverse impact.

213. However, these results are not significantly dissimilar to the consented scheme and there should also be some acknowledgement that the site is in an opportunity area within a central London location and accordingly the standards should be applied with some degree of flexibility.

214. In conclusion, it is considered that whilst the impacts to some rooms would fail to meet the relevant standards of the BRE, other factors such as the slender design of the tall buildings, gaps between the buildings and the improvement to the urban environment and public realm should be given weight, and accordingly would be sufficient to consider the level of impact, on balance, acceptable.

Sunlight

215. In considering the impact upon sunlight to residential properties, the test is based upon a calculation of annual probable sunlight hours (APSH) for all window faces within 90 degree of due south. BRE guidelines require that a window should receive a minimum of 25% of the annual probable sunlight hours, of which, 5% should be received in winter months. Where window sunlight levels fall below this recommendation, the window should not lose more than a 20% loss of its former value.

Table 15

<table>
<thead>
<tr>
<th>Property</th>
<th>No. of rooms</th>
<th>BRE compliant</th>
<th>Non-Compliant</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Winter APSH</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>20-30% Loss</td>
</tr>
<tr>
<td>Rennie Court</td>
<td>72</td>
<td>48</td>
<td>0</td>
</tr>
<tr>
<td>231 - 232 Blackfriars Road</td>
<td>26</td>
<td>24</td>
<td>0</td>
</tr>
</tbody>
</table>
The above table demonstrates that there will be a total 63 windows that would experience a reduction of over 20% above baseline in terms of annual probable sunlight hours and 386 of the rooms would remain compliant with the BRE Guidelines (86%). The impacts to 231 - 232 Blackfriars Road and King's Reach/South Bank Tower are minor.

The windows principally affected on Rennie Court are south facing and 10 of the rooms are of unknown use. In terms of total APSH, five of the windows would experience reductions of between 20% - 30% which is considered minor given the densely urbanised environment. Four of the rooms would experience reductions in excess of 40% which is more significant; however, it is the view of officers that the overall results for Rennie Court indicate a moderate adverse impact.

At 1 - 87 River Court 81% of the assessed windows would continue to meet the BRE in terms of APSH with only six windows experiencing reductions in excess of 40% which is considered to be a moderate adverse impact in the context of the overall results for River Court.

As with daylight, there are a number of windows which would not meet the BRE guidelines for summer and winter sunlight. In many cases this appears to be the result of existing lower levels of sunlight. However, the extent of non compliance is considered minor overall given the densely developed, highly urbanised central London location.

Light pollution and solar glare

In terms of light pollution, the majority of assessed properties would experience a negligible impact with only the Mad Hatter and Christ Church having more intense impacts and as these are not in residential use it is not considered that amenity would be detrimentally harmed. Solar glare impacts have been measured from several viewpoints and all but one of these viewpoints would experience either minor or negligible impacts. The one viewpoint that may have a moderate adverse impact is the approach to Blackfriars Road from the south and this impact is not so significant to warrant refusal of the application or any specific mitigation.

Overshadowing of amenity spaces

The BRE guidance states that for an amenity area to be adequately lit, it should receive at least 2 hours sunlight over half of its area on the 21 March. If the area receiving 2 hours sunlight is reduced by more than 20% it is considered that the change may be noticeable.

Three areas have been assessed: the amenity space at Rennie Court, the emerging
public realm at One Blackfriars and Christ Church Gardens. The amenity space at Rennie Court and Christ Church Gardens will only experience minor reductions in sunlight and will continue to meet the BRE guidelines. The public realm at One Blackfriars has been assessed in two parts (north and south) and these spaces would experience a more significant reduction (63% and 98.7% respectively), however this is not significantly dissimilar to the impact from the consented scheme and as such is considered acceptable on balance.

Noise and disturbance (proposed music venue)

223. The proposed music venue has the potential to lead to disturbance to the existing nearby residents to the north of the site. The council’s environmental protection team have responded to the application and have also raised this as a concern particularly with regards to the proposed closing time of 03.00am and the lack of clarity around queuing areas and dispersal. The music venue itself is located in the basement and has a capacity of approximately 525 people and as such is unlikely to cause significant disturbance from within the venue, the main issue being patrons arriving and leaving. Taking into account the operating hours of other establishments in the area, officers consider that midnight closing time during the week and a 01:30am closing time on Fridays and weekends to be more appropriate with a further requirement for the applicant to submit a Noise Management Plan that will include details of how all elements of the music venue would be operated (including patron and queue management, dispersal policy, neighbour communications and internal noise insulation etc.). With this mitigation in place, it is not considered that the proposed music venue would have an adverse impact on neighbouring amenity.

Noise and vibration (construction /operational impacts)

224. The noise and vibration impacts from the site would be highest during the demolition of the existing buildings and substructure works (which would include excavation and piling works) and lowest during the internal fit out and landscaping. The construction of the basement, formation of foundations and piling are likely to be the most significant noise and vibration sources although these impacts would be temporary. There would also be a degree of disturbance from increased vehicle movements during the construction phase. And this is likely to increase noise levels, particularly along Stamford Street, Paris Gardens and Blackfriars Road. A construction environmental management plan (CEMP) would be prepared to reduce excessive noise as far as is possible. The noise impacts from demolition and construction would be temporary in nature and it is not envisaged that any long term disturbance would be caused.

225. In terms of the completed development, noise from plant can be controlled by condition. The development itself is not anticipated to result in a detrimental increase in traffic once the development is complete and operational. An increase in noise on Paris Gardens is anticipated as this is the vehicular access for the proposed development however this increase is restricted to a short section of Paris Gardens and is considered to be a minor residual impact.

226. The development would result in a significant increase in the number of residents, visitors and workers as a result of the new homes, retail and cultural attractions and new offices. However, it is not anticipated that there would be any demonstrable harm caused to residential amenities from their comings and goings. The site is located
within a busy major town centre environment and adjacent to a busy transport route/junction where some noise should be expected.

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

227. The application site is located in an area characterised by a range of uses that will largely be mirrored by the proposed development and there is not anticipated to be any conflict of use detrimental to amenity.

**Transport issues**

228. The NPPF states that planning decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (paragraph 34).

229. Core Strategy strategic policy 2 encourages walking, cycling and the use of public transport rather than travel by car. Saved policy 5.1 of the Southwark Plan states that major developments generating a significant number of trips should be located near transport nodes. Saved policy 5.2 advises that planning permission will be granted for development unless there is an adverse impact on transport networks, and/or adequate provision has not been made for servicing, circulation and access, and/or consideration has not been given to impacts of the development on the bus priority network and the Transport for London (TfL) road network.

230. An assessment of the likely significant environmental impacts of the development on transport is included within the ES. A framework travel plan has also been submitted.

**Site context**

231. The site is bounded to the north by A3200 Stamford Street, to the east by A201 Blackfriars Road, to the south by Christ Church Gardens and Colombo Street and to the west by Paris Garden. The scheme excludes the Mad Hatter and 1 Stamford Street, although incorporates servicing for these properties.

232. The site benefits from a High PTAL (6b) as measured by the applicant. There are six London underground lines in 12 minute walk of the site (via Blackfriars, Southwark and Waterloo stations) all these stations are fully accessible. The area is supported by rail services at Blackfriars, Waterloo and Waterloo East all within 960m of the site. The bus network surrounding the site is fully accessible albeit with some alternations due to nearby construction activities.

233. The site fronts Blackfriars Road, which supports the north-south cycle super highway, the cycle superhighway sees 4,695 people cycling in the peak hours. The application proposes a new cycle hire docking station on this frontage to support an increase in cyclists using cycle hire bikes thereby increasing local usage. Paris Gardens to the west of the site is a key north/south link from The Cut to towards the river for people walking. The site lies within the C1 Bankside parking zone which operates Monday to Friday between 08:00 and 18:00 and on Saturday between 9:30 and 12:30.
Site layout

234. The proposed development would provide a new public square which would provide a pedestrian connection between Blackfriars Road and Stamford Street and the Thames Pathway. The introduction of this new pedestrian route would improve permeability through the area while the proposed active uses at the ground floor level would provide increased informal surveillance for pedestrians using the area.

235. The proposed site layout would improve pedestrian routes in the area, in particular providing two new east-west routes and a north-south route through the development. The landscaping plans show a route through the site, however as this route includes a number of landscaping, features further assessment of pedestrian demand and comfort levels of this internal space should be undertaken prior to finalisation of the internal landscaping arrangements.

236. Upon completion of the development, there would be two vehicle access points into the development:

- A 12m wide crossover on Paris Gardens to provide access to the van/ car lifts and basement parking provided at basement 2 and 3
- A 20m wide crossover on Paris Gardens approximately 80m south of the junction with Stamford Street to provide access to the truck lifts and surface level servicing.

237. As part of the proposals, it is also proposed to relocate the pedestrian crossing on Stamford Street to the centre of the frontage and provide a coach bay to the west of this location. Paris Gardens would provide two vehicle crossovers, a pedestrian access alongside changes to the parking configuration to provide three taxi bays adjacent the hotel lobby and a further taxi bay adjacent the hotel suites lobby. Rennie Street, a ‘no through road’ that dissects the site from Stamford Street, would require to be stopped up in order to facilitate development. The principle of ‘stopping up’ Rennie Street was accepted as part of the consented scheme.

Cycle, pedestrian and vehicle movements

238. The development site is located within immediate proximity to Blackfriars network rail system and close proximity to Blackfriars and Southwark underground. The proposed development would result in an increase in the resident, working and visiting population in the local area leading to an increase in the number of journeys undertaken on the public transport network.

239. The proposed development would result in an increase in cycle movements to and from the site particularly within peak hours. It is anticipated that the development will generate an additional 94 cycle trips during the AM and PM peak with the majority of this being via the cycle super highway located on Blackfriars Road.

240. Whilst the majority of trips are likely to be on foot, cycle and via public transport there would be a significant impact on the local highway network. The additional vehicle trips generated by the development area include 97 additional trips during the AM peak hour (9:00 - 10:00) and 102 additional trips during the PM peak hour (17:00 - 18:00).
241. The hotel element of the development generates the highest proportion of vehicular movements namely taxi trips, 82 vehicular trips during the AM peak and 82 trips during the PM peak and these will all occur on street on Paris Gardens. The applicant has stated that it is anticipated that the occupancy of a taxi would be 1.5 passengers per taxi. Therefore, there would be 55 two way trips during the AM and PM peak respectively.

Paris Gardens

242. It should be noted that Paris Gardens will see a significant increase in usage as a result of the development. With an addition 105 and 75 additional movements in the AM and PM peaks respectively. The southbound movement will egress the area through Paris Gardens then Columbo Street, both of which are of narrow width. More locally to the site, the application requires the reconfiguration of the parking arrangements on Paris Gardens to accommodate the development; these include the loss of four pay and display bays and 12m of motorcycle parking, the relocation of a car club bay and permit bays and the provision of two vehicular crossovers and four taxi bays.

243. The applicant proposes to remove the car club bay and four permit bays to the north of Paris Gardens for these to be replaced with taxi bays and for the pay and display bays located further south on Paris Gardens to be converted to permit bays. The council would expect the applicant to demonstrate negligible impact of this loss through parking stress surveys and this would be considered as part of a transport strategy within the legal agreement.

244. The applicant has proposed three taxi bays on the northern section of Paris Gardens, adjacent the hotel suite. The applicant would need to provide robust justification for the proposed taxi drop off bays given the impact on the local highway network. Should the taxi drop off bays be installed it is suggested that adequate marking and signing showing restriction times be installed at the cost of the developer. These issues would be covered in the legal agreement. It is requested that a condition be made that the drop bays are for drop off and pick up only and are not short stay parking/loading and have time restrictions to be agreed with the council as part of the service management plan.

245. The applicant has provided swept paths for all accesses, in/out and in both directions. The swept paths for the Truck Lift (drawing 238649-01-AT-035) shows for a truck to manoeuvre into the lift, it has to traverse through the southern most taxi bay. The removal of the taxi bay is required to facilitate access to the truck lift access. With this amendment, the site proposed accesses can accommodate the associated vehicles entering and exiting the site in a forward gear, albeit with significant reconfiguration of parking arrangements on Paris Gardens.

246. The applicant has proposed to reconfigure the parking bays along Paris Gardens. The applicant has shown on plans should this parking space not be occupied a servicing vehicle encroaching the parking bay and entering the site. Should the parking be occupied the applicant has stated that vehicles would enter the site from the opposite side of the road against on coming traffic, this is not considered appropriate and the proposed parking bay closest to the servicing access should be removed. This amendment would be secured as part of the legal agreement and the S.278
Agreement

Stamford Street

247. Road safety concern is raised about the provision of the coach bay on Stamford Street. The distance from the end of the coach bay to the junction with Paris Gardens is 10m as measured on drawing 01231-WEA-MP—00-DRP-A-1100; this is the minimum allowable under the council’s transport SPD. In addition the coach bay is located 5m from the proposed pedestrian crossing. Whilst the coach bay meets the minimum dimensions concern is raised with the visibility of vehicles entering and exiting Paris Gardens which is further increased through Paris Gardens being the vehicular and service access point for the full site.

248. The applicant has provided a road safety audit, stage one. Having assessed this, officers are still of the view that movement restrictions may need to be considered at the junction of Paris Gardens and Stamford Street, for instance making Paris Gardens left in/left out, additional speed reduction measures, raised table or additional road markings. Provisions for these options and assessment would be included within the legal agreement. A further impact of the coach bay is its impact on the pedestrian experience as it would reduce the available footway width, however Transport for London (the highway authority for Stamford Street) are satisfied with the current arrangement.

Car parking

249. 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. For office use, a maximum of one space per 1500sqm is permitted which would equate to a maximum of 22 spaces. No parking (except disabled provision) is permitted for retail or culture uses. Parking for the residential element is proposed as 44 spaces provided at basement level 3 accessed via a car/van lift from Paris Gardens and includes:

- 30 accessible parking spaces (23 for the private residential and seven for the affordable residential)
- 14 standard parking spaces.

250. The provision of car parking above council policy maximums and the resulting impact on Paris Gardens would not normally be acceptable; however, the level of parking needs to be considered in the context of the overall benefits of the development and the justification for refusal of an otherwise acceptable scheme. The mitigation in the form of a financial bond would be secured, with penalties deducted should the number of trips exceed those as set out in the transport assessment. The development would need to incorporate sufficient infrastructure to allow the monitoring of vehicle movements.

Parking bond

251. The site is located within a high PTAL within a CAZ and within a CPZ. Therefore a car free development would be expected. However, the applicant has stated that they require a level of off street parking to enable them to sell residential units. Funding will be sought for off-site sustainable travel initiatives to reduce background traffic in order
to mitigate the additional car trips that the development will impose upon the network. An equitable way of securing this would be for a sum of money to be held as a bond, and for penalties/fines to be deducted from the amount should the number of predicted vehicle trips exceed those as set out in the transport assessment. This also provides a small disincentive to car use to meet the aims of the council’s car-free policy. It should be noted that as previously stated the site is located within a CPZ and therefore all occupiers of the development will be made ineligible from obtaining an on street parking permit.

Cycle parking

252. For the residential component cycle parking is to be provided in excess of London Plan standards and provides a mix of styles. The cycle parking for the office provision is also to London Plan standards and includes changing and maintenance spaces. The proposed maintenance and changing facilities are welcomed.

253. For the other non residential uses a total of 110 cycle parking spaces would be provided, this is lower than the 139 required and the application states that this is to due to balancing the requirement to create a functional public space without it being cluttered with cycle parking and other street furniture. Some cycle parking is located within the public square and to the southwest of the site adjacent the service quarter/affordable housing. This cycle parking (totalling 22 spaces) is poorly located, and should be considered further in the landscaping and cycle parking plans conditions.

254. The applicant has advised that cycle access will be provided through dual usage lifts, and that these will be compliant with London cycle design standards with a stair gully provided as an alternative access in case of maintenance or repair of this lift to ensure continuous access. The applicant would be required to provide detailed drawings with regards to each cycle storage location with regards to the dimension proposed for the cycle storage.

Servicing

255. Servicing is proposed at a surface level access from Paris Gardens, with goods then being moved through the site via the basement. The proposed trip generation by delivery vehicles estimates a total of 159 daily trips or (318 movements) with 17 trips (or 34 movements) in peak hours. Within basement level 2, a total of five loading bays are proposed comprising space for two 10m vehicles, two 8m vehicles and one 6m vehicle. Goods would be transported from the basement service area to the various land uses with back of house lifts provided to ground floor and other upper levels.

256. The applicants are encouraged to look at consolidation of servicing where possible to mitigate the number of servicing trips associated with the site on a daily basis (159). The applicant could look at a central holding area, then moving the delivery to the intended recipient when they have returned home. With regards to the hotel and retail/commercial the same supplier could be used for stationary, food, toiletries etc. by doing this the applicant would significantly reduce the number of servicing trips, minimising noise and air pollution, and minimising the potential conflict with pedestrians and cyclists.
Whilst the broad strategy for servicing is acceptable, a delivery and servicing management plan would be secured as part of the legal agreement, and this would allow officers to improve and refine the servicing arrangements in order to minimise any potential impacts.

Construction

The total construction period has been given as approximately four years from start to finish. During peak periods it is anticipated that there would be approximately 60 vehicles trips per direction (120 in total) per day and 35 vehicle trips per direction (total 70) during peak periods. In total it is anticipated that there would be 38 vehicle trips per hour during the construction period of this development. Given the narrow width and local nature of Paris Gardens it is considered inappropriate for construction vehicles. As such, all construction vehicles would be expected to access and egress the site from Stamford Street. The routing for construction vehicles would be required as part of a construction logistics plan secured in the legal agreement. All vehicles should use strategic roads and keep the usage of residential roads to a minimum. The cycle superhighway on Blackfriars Road should help to minimise potential conflicts between cyclists and vehicles.

Construction hours have been given as between the hours of 8.00am and 6.00pm Monday to Friday and 8.00am to 1.00pm on Saturdays. This accords with the council’s agreed normal working hours. However, it is recommended that construction vehicles avoid peak hours. Details would be required with regards to how the book-in system will be managed. Details would be required with regards to how the applicant would manage a late delivery.

Archaeology

The site does not lie within a borough designated archaeological priority zone (APZ), but is adjacent and south of the Borough, Bermondsey and Rivers archaeological priority zone. The applicant has reviewed archaeology as part of the ES and has submitted a desk based assessment (DBA) which adequately summarises the potential of the site. The DBA shows that the site has undergone several phases of historic development but does have the potential to contain multi-phase archaeological deposits that will require protection through the planning process. A small scale programme of archaeological monitoring in 2015 confirmed that, as expected, deposits of archaeological interest survived below existing single storey basements (as well as the less truncated areas elsewhere across the site).

It is possible that the site may contain important archaeological deposits in the form of post-medieval burials (high significance) from the Christchurch burial ground, to the south and east. The extent of the burial ground is shown on historic maps, but the present church was built in 1958 - 59 by R. Paxton Watson, and is known to have replaced a Georgian Church of the same name dating from 1738 - 41. It is also known that the Georgian church replaced an earlier church built in 1671. Therefore, it is possible that these earlier burial grounds could extend into the application site area.

The council’s archaeologist has been consulted and fully agrees with the findings of the DBA that further archaeological evaluation is required and this will be adequately dealt with by way of planning conditions.
Ecology

263. Ecology has been assessed as part of the ES which notes that the site was largely occupied by office buildings and hard standing and as such has limited ecological value in its current state with the only notable ecological features being the street trees and Christ Church Gardens to the south. An inspection of the buildings for bat roosting was carried out before demolition of the existing buildings and the potential for bat habitat was considered low.

264. There would be no effects on any nationally or internationally designated habitats and only negligible effects on local habitats and sites of interest for nature conservation (SINCs). During construction, adherence to the requirements of a CEMP (which would be required by condition) would result in the development having residual effects of negligible significance. The council’s ecologist has reviewed the proposal and considers it to be acceptable, subject to conditions regarding ecological monitoring, green walls, biodiverse/brown roofs and nesting boxes.

Wind

265. Wind and microclimate effects have been modelled and reported within the ES. The assessment has considered the impact of wind on both pedestrian comfort and the potential for strong winds to cause distress. During the design process a small number of locations were identified where the wind conditions would not be expected to comply with the established comfort and safety criteria. Mitigation measures have since been applied to those areas and the scheme was re-tested with all wind conditions being successfully mitigated.

266. With the mitigation in place, the pedestrian level wind environment in and around the site is rated as suitable for all users throughout the year in terms of safety. In terms of comfort, all locations on the ground and at elevated levels are predicted to have wind conditions that would be suitable for the intended uses. As such the effect of the development on the wind microclimate is considered to be negligible.

Water resources and flood risk

267. Water resources and flood risk have been fully addressed in the ES. The Environment Agency and the council’s flood and drainage team have been consulted on the application. The Environment Agency raised no objections. However, the council’s flood and drainage team requested that the applicant submit a basement impact assessment to quantify the potential impact of the proposal on groundwater. The basement impact assessment was subsequently submitted and reviewed by officers and is considered acceptable subject to conditions. The ES quantifies the effect of the development on water resources and flood risk as being negligible and officers would agree with this subject to the conditions recommended by both the Environment Agency and the council’s flood and drainage team.

Waste

268. The construction process would generate construction and excavation waste and this process is currently underway as part of the consented scheme. The waste impact
from this phase of the development is of minor significance and is temporary in nature. In the operational phase the development is considered to provide sufficient space to allow for segregated waste storage. The volume of waste and its potential for recycling has been evaluated in the ES and is judged to be of negligible significance.

**Socio economics**

269. The development would result in jobs during construction and then an increase in employment floorspace once completed. The new jobs taken together with the increased spending locally from workers and new residents would result in a minor beneficial impact. The impact on local schools and healthcare facilities due to the uplift in child and general populations is of minor adverse significance however it is considered that this can be adequately mitigated through the community infrastructure levy.

**Air quality**

270. The majority of the borough, including the application site, is within an air quality management zone due to the significant presence of traffic generated pollutants. As a result, developments are required to take account of any impacts upon air pollution as a result of, and during construction of, a proposed development. An air quality assessment has been prepared and submitted as part of the ES and has been reviewed by the council’s environmental protection team.

271. The ES has identified potential adverse effects upon local air quality during the construction phase, particularly from dust generation and additional construction traffic vehicle movements. However, these would be temporary in nature and can be mitigated as far as possible through measures secured as part of the construction environmental management plan. The mitigation measures proposed to offset the generation of dust include procedures such as vehicle wheel washing, screens, water spraying and regular monitoring. These measures would be implemented as part of the construction environmental management plan (CEMP).

272. Local air quality could be affected by the traffic generated by the development and the assessment has also considered the effect of the proposed combined heat and power (CHP) and centralised boiler plan on air quality. Small changes to air quality are predicted along streets around the development due to the developments traffic and the emissions from CHP and boiler plant associated with the development. But these emissions are considered to have a negligible or minor adverse on local air quality. The AQMA has also demonstrated that the air quality for prospective residents is considered to be acceptable. The council’s environmental protection team have recommended conditions with regards to air quality and these will be attached to any consent issued.

**TV and radio reception and interference**

273. There is the potential for the completed development to interfere with TV and radio reception due to the height of the buildings and transmission to the north/north west of the site, and the assessment included within the ES has considered this impact to be of negligible significance. It should be noted that this is a reduced impact in comparison to the consented scheme and the ES recommends appropriate surveys to
be undertaken before and after the development to assess the likely impacts. If any interference is shown to be caused by the development, then appropriate measures can be put in place on completion. With mitigation in place, the long-term residual impacts to radio and TV reception are predicted to be negligible. Such mitigation can be appropriately secured through conditions.

Aviation

274. Heathrow Airport and NATS safeguarding office have been consulted on the application and NATS safeguarding have raised concerns about the potential impact of the proposal on the radar located at Heathrow Airport. This radar (known as Heathrow H10 PSR/SSR) provides data to the NATS London Terminal Control Centre as well as to a number of other users, including Heathrow and City Airport. They are concerned that false radar targets could be generated due to the tall buildings interfering with the radar signal. This can however be mitigated through modifications to the radar system and NATS have therefore advised that two aviation conditions should be imposed on any grant of planning permission to secure details of a Radar Mitigation Scheme (RMS). The relevant conditions will be attached to any consent issued.

Contamination

275. An assessment of soil environment and ground conditions has been undertaken in order to establish the potential for past contamination to exist at the site and the likely risk to a range of sensitive receptors including human health, underlying aquifers and flora and fauna. The ES advises that there is little evidence of potentially contaminative uses on the site in the past. Moreover, the redevelopment of the site for the current buildings involved extensive basement excavation which is likely to remove potential contamination.

276. The Environment Agency and the council’s environmental protection team have recommended a range of conditions regarding land contamination and appropriate remediation works. Further protection from impacts during construction can be achieved through the requirement for the applicant to submit a construction and environmental management plan. With appropriate mitigation in place, the impacts are considered to be negligible.

Energy and sustainability

277. The London Plan policy 5.2 sets out that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy: be lean: use less energy, be clean: supply energy efficiently, be green: use renewable energy. This policy requires development to have a carbon dioxide improvement of 35% beyond Building Regulations Part L 2013 as specified in Mayor’s Sustainable Design and Construction SPG

278. Policy 5.3 states that developments should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process. Within the framework of the energy hierarchy, major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable
energy generation, where feasible.

279. Strategic policy 13 of Core Strategy states that development will help us live and work in a way that respects the limits of the planet’s natural resources, reduces pollution and damage to the environment and helps us adapt to climate change.

280. The applicants have submitted an energy strategy and a sustainability assessment for the proposed development which seek to demonstrate compliance with the above policy.

Energy

281. An energy statement has been submitted which provides an initial assessment of the energy demand and carbon dioxide (CO₂) emissions from a baseline building and estimates the expected energy and CO₂ emissions savings associated with the proposed development. The applicant proposes to use a range of ‘be lean, be clean and be green’ measures in order to achieve the required carbon reduction.

Be lean

282. The measures proposed include:

- Suitable glazing ratio and glass g-value to balance heat loss/gains and daylight ingress
- Fabric insulation and air permeability above Part L of the 2013 Building regulations
- High efficiency mechanical ventilation as well as mechanical ventilation with heat recovery for residential areas
- Centralised gas boilers and high efficiency plant
- Insulated pipe and ductwork
- Variable speed pumps and fans to minimise energy consumption of services.

283. These measures will achieve approximately 4% carbon reduction over the 2013 Building Regulations.

Be clean

284. In order to supply energy efficiently, the applicant is proposing to install a site wide heating network by way of a combined heat and power (CHP) engine and this will achieve a 26% reduction over the 2013 Building Regulations.

Be green

285. The application site has limited ability to provide renewable energy. However, following consultation with the Greater London Authority, the applicant has agreed to install approximately 60sqm of photovoltaic panels in the most viable areas of roof space. This would generate approximately 1% CO₂ savings above the 2013 Building Regulations.

286. The proposed development will have total CO₂ emissions of 3623 tonnes per annum. The be lean/be clean/be green measures set out above would generate a 31%
improvement beyond Buildings Regulations Part L 2013. This is below the policy requirement of 35% however, as agreed with the GLA, it is not considered that there are further options available to making additional CO₂ savings and as such it considered appropriate to off-set this shortfall with a financial contribution to the carbon off-set fund. This would include a payment of £571,300 in order to make the residential element of the development ‘carbon zero’ and a top up payment of £285,340 in order to make up the shortfall in the 35% reduction on the 2013 Building Regulations. The total carbon off-set fund contribution would therefore be £856,640.

Sustainability

287. As well as the measures outlined above, the applicant has undertaken an early, indicative BREEAM assessment which concludes that the offices and hotels would achieve BREEAM Excellent. This will be secured by condition alongside measures to ensure the retail and music venues both achieve the relevant BREEAM level as well.

Trees and landscaping

288. Saved policy 3.13 of the Southwark Plan requires a high quality streetscape and landscaping to be delivered. An arboricultural impact assessment (AIA) has been submitted and this has been reviewed by the council’s urban forester. No existing trees or landscaping present constraints to development within the site. However, the adjacent Christchurch Gardens are characterised by a number of large and mature trees protected by TPO ref 229 which will be affected. The AIA includes detailed trial trench investigations showing that no roots have been found from trees which may be affected by the basement, and that only minor canopy pruning is required. Elsewhere along Stamford Street, the street trees are retained and suitable protection measures can be implemented so that they can continue to provide a significant contribution to amenity as part of the new public realm.

289. The central public realm area is characterised by the use of climbing plant clad umbrella type structures which will be the central feature alongside a stage/water feature. This would provide a central point of interest within the new public plaza together with a significantly sized green wall facing the square, new tree planting and rooftop terraces. The proposed approach to landscaping and public realm is of design merit.

290. The green buffer of mature trees to the south will shade the plaza to a certain degree making the smaller canopy sculptures appropriate than more substantial planting. New access routes significantly improve permeability which is enhanced by a group of trees and planting beds situated at focal points which can be seen from entrances into the development. However, further details are required of proposed planting within tower recesses where small trees and other planting is shown. Together with the significantly sized planters at roof level these will need to be sustained by adequate soil volumes within automatically irrigated planters. This would also need to be reflected in the planting within the public space where soil volumes would be limited by the underlying basement. In terms of landscaping and trees, the proposed development is acceptable subject to conditions.
Equalities

291. The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics namely: age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, and sex and sexual orientation. It places the local planning authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers. Officers have taken this into account in the assessment of the application and members must be mindful of this duty, inter alia, when determining all planning applications. In particular, members must pay due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

292. Equalities has been considered as part of the ES within the chapter on socio-economics where the development is considered to have a neutral effect with respect to equalities.

Planning obligations (section 106 undertaking or agreement)

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

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

294. 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.
### Section 106 obligations

Table 16

<table>
<thead>
<tr>
<th>Planning Obligation</th>
<th>Mitigation</th>
<th>Applicant Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amenity Space Shortfall</td>
<td>£115,005</td>
<td>Agreed</td>
</tr>
<tr>
<td>Archaeology</td>
<td>£11,171</td>
<td>Agreed</td>
</tr>
<tr>
<td>Car Club</td>
<td>Provision of a car club bay on Paris Gardens and three years membership for all eligible residents.</td>
<td>Agreed</td>
</tr>
<tr>
<td>Carbon Offset – Green Fund</td>
<td>£856,640</td>
<td>Agreed</td>
</tr>
<tr>
<td>Child Play Space</td>
<td>£13,801</td>
<td>Agreed</td>
</tr>
<tr>
<td>Christ Church Gardens</td>
<td>Improvement works to the value of £360,000.</td>
<td>Agreed</td>
</tr>
<tr>
<td>Cross Rail</td>
<td>£7,859,318.05</td>
<td>Agreed</td>
</tr>
<tr>
<td>Cycle Hire</td>
<td>Three years membership for all eligible residents.</td>
<td>Agreed</td>
</tr>
<tr>
<td>Employment During Construction</td>
<td>237 sustained jobs to unemployed Southwark residents 237 residents trained in pre/post employment short courses. 59 new apprenticeships. Or a payment of £1,143,150</td>
<td>Agreed</td>
</tr>
<tr>
<td>Employment in the Development</td>
<td>251 sustained jobs for unemployed Southwark residents at the end phase. Or a payment of £1,079,300</td>
<td>Agreed</td>
</tr>
<tr>
<td>Parking Bond</td>
<td>£397,000</td>
<td>Agreed</td>
</tr>
</tbody>
</table>
Transport for London | Cycle hire docking station - £135,000 | Agreed
---|---|---
Trees | Not specifically required unless unforeseen issues prevent trees from being planted or they die within five years of completion of the development in which case a contribution will be sought - £5,000 per tree. | Agreed
Admin Charge (2%) | £82,221.34 | 

Section 106 provisions

295. The section 106 agreement will also secure the on-site and off-site affordable housing as well as a review mechanism and relevant cascade should unforeseen circumstances lead to the off-site proposal at Amelia Street not being delivered. The legal agreement will also secure the standard of fit out and marketing period for the wheelchair accessible homes, an estate management plan, demolition and construction environmental management plan, service management plan, music venue noise and management plan, landscaping plan, transport strategy and parking management plan, including details of the proposed bond.

296. The contributions and in lieu works detailed in the table above will also be secured under the section 106 agreement alongside any section 278 highways works and amendments to the traffic management order. The transport strategy and parking management plan will be included as an obligation within the section 106 and will need to be formally approved by the council. The legal agreement will also secure the delivery of the office accommodation as well as the sequence of the phases of the development and the relevant restrictions. The contributions of the section 106 agreement will be paid on implementation.

297. In the event that an agreement has not been completed by 31 January 2018, the committee is asked to authorise the Director of Planning to refuse permission, if appropriate, for the following reason:

298. In the absence of a signed section 106 legal agreement there is no mechanism in place to secure adequate provision of affordable housing and mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to 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 Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

Community Infrastructure Levy (CIL)

299. Section 143 of the Localism Act states that any financial contribution received as 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 invests in London as a whole, primarily Crossrail. While Southwark’s CIL will provide for infrastructure that supports growth in Southwark. In this instance an estimated Mayoral CIL payment of £4,982,504 and a Southwark CIL payment of £26,570,760 are due.

**Conclusion on planning issues**

300. The proposed redevelopment of the site would provide a high density, mixed use development with commercial, residential, cultural and retail uses, and would support the aspirations of the Blackfriars Road SPD. In particular, the proposed significant increase in the quantum of employment space on site would make a significant contribution to meeting the vision of providing 25000 - 30000sqm of business floor space within the opportunity area. In addition the proposed development, with a new public space, would result in improved connectivity and a significant enhancement to public realm within the opportunity area.

301. The on site provision of 61 social rented homes, equating to 24% on site provision in a central London location is a significant benefit of the development and is welcomed by officers. The principle of providing the balance of affordable housing off site is also accepted and has the benefit of enabling early delivery of affordable homes. Officers consider that the total level of affordable housing proposed, at 37%, alongside an in lieu payment of £1.6 million, is supported by the submitted viability assessment and is considered acceptable.

302. The development is in a highly appropriate location for a tall building being at the heart of cluster emerging around the junction of Blackfriars Road, Stamford Street and Southwark Street as identified in the Blackfriars Road SPD. Officers are satisfied that the proposal is of the highest architectural standard and would provide high quality homes. The proposal provides an appropriate response to context and would not harm the character or setting of the nearby heritage assets including conservation areas within the London Borough of Lambeth or listed buildings. Furthermore, careful consideration has been given to the impact of the proposal on townscape views including LVMF views. Officers consider that the development would not cause harm to these views, despite being visible from a number of vantage points. The GLA are also supportive of the development and do not consider that the proposal would harm strategic views.

303. Developments of this size and nature have the potential for significant environmental impacts and therefore an environmental statement has been submitted. Officer have fully assessed the environmental statement and have taken the view that whilst there would be significant impacts on daylight and sunlight and more moderate impacts on transport, the level of impact was not so significant to warrant refusal of the application and in many instances, appropriate mitigation would reduce impacts to a negligible level. Following mitigation measures, there are likely to be some adverse impacts association with the demolition and construction phases but these impacts would be short term

304. Officers consider the development to offer a range of significant benefits including housing, employment and cultural use as well as a significant public realm offering.
Having regards to the development plan and national, regional and local guidance, officers recommend that planning permission be granted, subject to conditions, completion of a legal agreement and referral to the Mayor of London.

**Community impact statement**

305. 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.

306. A statement of community involvement has been submitted which details the public consultation and engagement process undertaken by the applicant prior to submission of the planning application. Public engagement included a series of meetings with key stakeholders in 2014 and 2015 culmination in two exhibition events on Thursday the 17 November 2016 and Saturday 19 November 2016. The applicant also set up a dedicated project website: [www.18blackfriarsroad.co.uk](http://www.18blackfriarsroad.co.uk). A briefing with the chair of the planning committee and ward members was held in March 2017.

**Consultations**

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

**Consultation replies**

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

**Summary of consultation responses**

309. Following neighbour consultation a total of 44 objections have been received, the main points of these concerns have been summarised and addressed below.

**Daylight and sunlight**

310. The objections listed below relate mainly to daylight and sunlight which has been addressed in full in paragraphs 190 - 222 of this report.

311. **Objection** - There will be a significant loss of daylight and sunlight to dwellings in Rennie Court and other surrounding buildings and this will affect amenity and wellbeing. There would also be an increase in overshadowing to nearby dwellings and amenity spaces/parks. This is further exacerbated by other large schemes in the area such as Kings Reach Tower.

**Response** – The results of the daylight assessment do reveal that there would be a number of rooms and windows that would not meet the relevant daylighting standards of the BRE, with those flats at Rennie Court and 1 - 87 River Court particularly affected. The ES has categorised losses of 20 - 29.9% VSC as minor adverse, 30-39.9% VSC as moderate adverse and any losses exceeding 40% VSC as major adverse. In this respect there are 56 residential windows that would experience a loss
of more than 40% VSC and officers agree that this would be a major adverse impact. However, these results are not significantly dissimilar to the consented scheme and there should also be some acknowledgement that the site is in an opportunity area within a central London location, and accordingly the standards should be applied with some degree of flexibility.

312. **Objection** - The daylight and sunlight information is difficult to understand and there will be a significant impact on the amenity space at Rennie Court which does not appear to have been quantified.

**Response** – A full daylight and sunlight assessment has been submitted by the applicant and assessed by officers. Of the amenity spaces assessed in the report, only that at the emerging One Blackfriars development would see a reduction in daylight/sunlight beyond the BRE guidelines.

313. **Objection** - Rennie Court will be significantly affected by the proposal in terms of daylight and sunlight and many rooms have been classes as 'unknown use' with the assumption that they are hallways or bathrooms. This is incorrect and the report glosses over the scale of the impact. It is also not clear why the ADF test was used on One Blackfriars and not on Rennie Court.

**Response** – Officers considered the daylight and sunlight assessment on the basis that all rooms are habitable and whilst there would be significant impacts on some rooms, the impact was considered acceptable on balance, given the central London location. 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. On this basis, using ADF to assess the impact on One Blackfriars is acceptable.

314. **Objection** - There are surely ‘rights to light’ issues at Rennie Court and it is unacceptable to justify the loss of daylight and sunlight purely on the basis that it is an urban environment.

**Response** – Rights to light are a civil matter that are separate to daylight and sunlight amenity issues and these would need to be addressed directly with the developer.

**Affordable housing**

315. The following objection relates to affordable housing which is considered in paragraphs 140 - 163 of the report

316. **Objection** - The development does not provide the full requirement of affordable housing on site.

**Response** – The proposed development would provide 24% affordable housing on site and a further 13% off-site, resulting in a total affordable housing provision (by habitable room) of 37% which is considered to be policy compliant.

**Transport**

317. The following objections generally raise transport matters which have been assessed
in paragraphs 228 - 259 of the report.

318. **Objection** - Paris Gardens will not provide suitable vehicular access for a development of this scale.

   **Response** – Paris Gardens is considered to be the most appropriate location for vehicular access and egress as Stamford Street is a much busier TLRN route and Blackfriars Road includes a cycle super highway. With appropriate conditions and mitigation, it is not considered that there will be detrimental transport or highway amenity impacts as a result of Paris Gardens being the vehicular access point.

319. **Objection** - The local transport and cycle network would not cope with the increased use as a result of this development. The increase in traffic may affect health as there will be an increase in air pollution.

   **Response** – The development is not anticipated to increase traffic levels to a level that would have any detrimental adverse impact on the local road network and access is gained from Paris Gardens specifically to avoid conflict with the cycle highway network. A construction environmental management plan would be secured in the legal agreement and alongside other mitigation; this would reduce any potential impact on public health.

320. **Objection** - The development will result in increased traffic which local roads would not be capable of accommodating.

   **Response** – The proposal would result in some increased traffic as a result of servicing the new development however this is not anticipated to be at a level which would be detrimental to the surrounding transport network or neighbouring occupiers.

321. **Objection** - The layout of the site is inadequate with no space for taxis or private vehicles to pick up or set down other than on the street and this will affect other road and highway users.

   **Response** – A coach lay by has been designed into the scheme and this would allow set down and collection without impacting on the flow of traffic.

**Amenity**

322. The following objections generally raise amenity issues that have been assessed in paragraphs 187 - 226 of the report.

323. **Objection** - There would be a loss of outlook and loss of privacy to nearby dwellings.

   **Response** – The proposed buildings are set back a sufficient distance from neighbouring buildings to ensure there would be no loss of privacy or outlook.

324. **Objection** - The tall buildings will result in excessive wind speeds.

   **Response** – This has been assessed in the ES and is addressed in paragraph 265 - 266 of the report.
325. **Objection** - The proposal includes a hotel and there are already several hotels in the area and this will lead to an increase in noise, traffic and deliveries to the detriment of local resident’s amenity.

**Response** – The proposal includes a hotel and this is an acceptable land use as part of a mixed use scheme in line with the aspirations of the development plan. Subject to appropriate mitigation, the hotel; music venue; and retail/restaurants would not result in any detrimental increase in noise or disturbance. The appropriate mitigation will be secured by condition.

326. **Objection** - The area does not need any more hotels/offices.

**Response** – Hotels and offices are acceptable land uses within this location and meet policy requirements as well as improving the local economy by increasing employment floorspace.

327. **Objection** - The construction will lead to further on-going disturbance to residents following on from other large scale construction projects in the area. Deliveries will also have a significant impact on noise and disturbance.

**Response** – Officers accept that construction work can lead to disturbance and for that reason a construction environmental management plan and logistics plan would be secured in the legal agreement in order to minimise any potential disturbance.

328. **Objection** - Nearby residents would be affected by significant light pollution.

**Response** – Potential impacts from light disturbance can be dealt with by condition. The relevant conditions would be attached to any consent issued.

329. **Objection** - The developer has been incompetent in demolishing the existing buildings and has failed to minimise impacts to local residents.

**Response** - As set out above, officers do appreciate that demolition and construction can lead to disturbance. In order to help mitigate this, a construction environmental management plan and logistics plan would be secured in the legal agreement in order to minimise any potential disturbance.

330. **Objection** - Christ Church gardens and its ecology will be badly affected.

**Response** – Adverse ecological impacts to Christ Church Gardens are not anticipated. Natural England and the council’s ecologist have been consulted on the application and raised no objections.

331. **Objection** - The buildings will trap noise from nearby sports areas as well as pollution.

**Response** – The buildings are not considered to be a risk for trapping noise or air pollution.

332. **Objection** - Glare and light reflection from the glass facades of the new buildings will impact on amenity.
Response – Solar glare impacts have been measured from several viewpoints and all but one of these viewpoints would experience either minor or negligible impacts. The one viewpoint that may have a moderate adverse impact is the approach to Blackfriars Road from the south and this impact is not so significant to warrant refusal of the application or any specific mitigation.

Design, views and heritage impacts

333. The following objections generally raise design issues that have been assessed in paragraphs 100 - 139 of the report.

334. **Objection** - The proposed buildings are far too high and will result in the loss of views from nearby dwellings.

   **Response** – The area has been identified as being suitable for tall buildings, and the slender design of the tall buildings will ensure that the impact on third party views is minimised.

335. **Objection** - The buildings are too tall and exceed the height specified for the Thames policy area and the council’s BBLB opportunity area study paper (2010) and as such would be overbearing.

   **Response** – The Blackfriars Road SPD identifies this site as being suitable for tall buildings. The slender design of the buildings and their location within a cluster (as recommended in the planning guidance) will ensure that they are not overbearing.

336. **Objection** - There development would have an adverse impact on views from St James’ Park and the Palace of Westminster as well as local views and conservation areas.

   **Response** – Whilst a small portion of the building would be visible in the views from St James’ Park, the intrusions are considered to be minimal in light of other approved schemes and would not be injurious to the protected view.

337. **Objection** - The proposed buildings are of a poor design.

   **Response** – The buildings are considered to be original, innovative and interesting in their design which is of the highest quality. The buildings would use a range of high quality materials that would ensure a high standard of finish and this would be secured by condition.

338. **Objection** - The buildings would cause substantial harm to conservation areas and important views.

   **Response** – Whilst the buildings would be visible in a number of views and from the nearby Roupell Street conservation area, the impact is not considered to be detrimentally harmful.

339. **Objection** - The council should ensure that the pictorial wall tiles retained from the Paper Moon are incorporated into the new development.
Response – Noted and agreed, this was a condition on the previous consent and the obligation to incorporate them into the new development would be carried through to any consent issued.

340. **Objection** - The proposal contravenes Southwark Council’s own Blackfriars Road SPD which envisaged heights decreasing southwards along Blackfriars Road.

Response – The SPD envisaged heights reducing southwards when moving away from the cluster at the northern end. The application site sits within this cluster and as such it is not considered to be significantly contrary to the SPD.

341. **Objection** - The developer is not providing any meaningful garden space.

Response – The development would include a central public realm with space for planting, seating and play.

**Other issues**

342. **Objection** - Utilities and local services such as GP’s and dentists may not be equipped to deal with the increased demands resulting from a development of this size.

Response – The Southwark Community Infrastructure Levy (SCIL) allows the council to raise funds from developers undertaking new building projects in the borough. The money can be used to fund a wide range of local and strategic infrastructure that is needed to support growth and development in the borough. This includes transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities and open spaces. In this instance, a significant SCIL payment of approximately £26,570,760 would be payable and this would contribute to funding services.

343. **Objection** - No additional infrastructure (transport/services/GP’s) is being provided and there would be impacts on emergency vehicles.

Response – The London Fire Brigade have been consulted on the application and raise no objections. Additional infrastructure would be funded, when needed, through the Southwark community infrastructure levy.

344. **Objection** - The proposal is an overdevelopment of the site and is significantly over-density.

Response – There are a number of high quality and high density schemes approved in the area, including the redevelopment of 185 Park Street, Sampson House, Ludgate House and the One Blackfriars development. The principle of the high density of the proposal is considered appropriate given the local context and location of the site within the CAZ and an opportunity area that has the highest level of public transport availability. Furthermore, the proposal is high quality in design, would provide a significant uplift in employment floorspace and would provide a high quality public realm.

345. **Objection** - The Oxo Tower and Mondrian are incorrectly classified in the design and
access statement.

Response – The design and access statement includes the correct uses for these properties albeit not including the full range of uses offered at these mixed use sites. This is a minor error and has not affected the assessment of the proposed development.

346. Objection - There has been a lack of dialogue between Southwark and Lambeth Councils.

Response – Lambeth Council have been consulted on the proposed development throughout the planning application process as have nearby Lambeth residents.

347. Objection – The proposal is of no benefit to local people or Londoners.

Response – The development brings significant benefits such as affordable housing, increased employment opportunities, improved cityscape and an attractive public space.

348. Objection - The consultation undertaken by the developer and Southwark Council has been inadequate, particularly with regards to Lambeth residents.

Response – The council have fulfilled the statutory obligations with regards to consultation with both Southwark and Lambeth residents. The developer has also undertaken consultation as outlined in paragraph 306.

Summary of responses from local groups

349. 20th Century Society – No response to date.

350. Better Bankside – The development is large in scale, would be visible from many parts of central London and would impact on many conservation areas and heritage assets. There has also been a significant reduction in affordable housing from the consented scheme. The consultation exercise undertaken for this development has been very poor and inadequate for a development of this size. There has not been an effective pre-application consultation and what was undertaken fails the tests set out in local and national policy. Better Bankside would urge the developer to revise their timetable and enter into an effective and meaningful consultation with the local community prior to submitting an application.

351. CAAG – CAAG do not support the proposal. The development is considered to be excessive in scale, poor quality in terms of architecture, excessively tall and at odds with the local townscape. The landscaping proposals were considered crude and there would be harm to local heritage assets.

352. Lambeth Estate Residents Association – The proposed development is excessive in scale, height and massing and would have harmful impacts on local conservation areas and both local and strategic views. The cumulative impact of the proposal alongside other large scale schemes in the area would have a significant impact on the local townscape. The development is not of a human scale, the buildings do not contribute positively to the London skyline or local townscape and the consultation
exercise was very poor. The affordable housing offer is not appropriate.

*Summary of responses from external and statutory consultees*

353. **Arqiva** – No response to date.
   
   **Response** – Noted.

354. **BAA Safeguarding** – No objection subject to a condition to ensure that the development will not impact upon the Heathrow H10 radar.
   
   **Response** – Noted and agreed.

355. **City of London** – No response to date.
   
   **Response** – Noted.

356. **City of Westminster** – Objection on the basis that the height and bulk will cause serious harm to a number of important views from the City of Westminster. These include the London view management framework views from St James’s Park (view 26A.1) and Waterloo Bridge (View 15B) and together with a number of metropolitan and local views identified in our conservation area audits and draft supplementary planning document metropolitan views. The impact on the view from the Blue Bridge in St James’s Park is particularly serious and unacceptable. Additionally the proposed development by reason of its height and bulk will harm the settings of the Grade I listed buildings of the Foreign and Commonwealth Office, and also at Horse Guards. The impact on the setting of the Foreign and Commonwealth Office is particularly serious and unacceptable. The proposed development by reason of its height and bulk will harm the settings of a number of Westminster conservation areas, including the Royal Parks, Whitehall, Savoy and Strand.
   
   **Response** - Whilst it is noted that the proposed tall buildings would be visible within these views, the incursions are not considered to be significant and the impact on the views is not harmful. It should also be noted that the GLA do not consider the impact on the views to be harmful.

357. **Civil Aviation Authority** – No response to date.
   
   **Response** – Noted.

358. **EDF Energy** – No response to date.
   
   **Response** – Noted.

359. **Environment Agency** – No objection subject to conditions relating to contamination, remediation and piling.
   
   **Response** – Noted and agreed, the relevant conditions will be attached to any consent issued.

360. **Greater London Authority** – Supportive of the proposal with the caveat that the
shortfall in carbon savings be offset and that the transport issues raised by Transport for London be fully resolved prior to permission being granted.

**Response** – Noted and agreed.

361. **Historic England** – No objection however Historic England believes that the proposed very tall building on this site causes serious harm to the historic built environment, in particular the protected views from St James’s Park and the Roupell Street and Aquinas Street conservation areas in the London Borough of Lambeth.

**Response** – Noted. Several viewing points have been presented in key streets of both conservation areas. These conservation areas have a consistent and well preserved historic townscape whose significance lies in the cohesive groups of brick-faced terraces of workers cottages and their relationship with the street. The exceptional quality of design is considered to adequately mitigate against this substantial incursion into the historic setting.

362. **London Borough of Camden** – No objection.

**Response** – Noted.

363. **London Borough of Islington** – No comments.

**Response** – Noted.

364. **London Borough of Lewisham** – No response to date.

**Response** – Noted.

365. **London Borough of Tower Hamlets** – No response to date.

**Response** – Noted.

366. **London City Airport** – No response to date.

**Response** – Noted.

367. **London Fire Brigade** – No objection subject to an undertaking being provided that access for fire appliances as required by Part B5 of the current building regulations approved document and adequate water supplies for fire fighting purposes, will be provided.

**Response** – Noted, the applicant has been asked to provide the relevant undertaking.

368. **London Underground** – No comments.

**Response** – Noted.

369. **Metropolitan Police** – No objection subject to Secured by Design condition being imposed.
Response – Noted and agreed.

370. **NATS Safeguarding** - Objection on the basis that the proximity, physical size and relative orientation of the development, is sufficient to generate false tracks on the Heathrow Radar.

Response – Noted and agreed, this has subsequently been discussed and it is agreed that this can be mitigated by way of two planning conditions.

371. **Natural England** – No objection.

Response – Noted.

372. **Network Rail** – No objections subject to conditions.

Response – Noted.

373. **Port of London Authority** – No objection in principle however the Port of London Authority would like to see further consideration and promotion given to the use of the river bus as an alternative form of sustainable transport, forming part of the key aims and objectives of the travel plans submitted, including the provision of targets for river bus use (which reflect the targets set out within the River Action Plan), measures to encourage river bus use and a timetable for river bus stop. The Port of London Authority would also like to see the River Thames being used for the bulk removal of materials, delivery of goods and supplies.

Response – Noted and agreed, the proposed measures will be secured as part of the travel plan in the section 106 agreement. Whilst the council would support the use of the River Thames for the delivery of goods and supplies there are no suitable local docking/loading points.

374. **Royal Borough of Greenwich** – No observations.

Response – Noted.

375. **Royal Parks** – No response to date.

Response – Noted.

376. **Thames Water** – No objection subject to conditions regarding the submission and approval of a drainage strategy, piling method statement and a water supply infrastructure impact study. Informatives are also recommended regarding water pressure, flow rates and cost responsibility of diverting Thames Water Infrastructure.

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

377. **Transport for London** – Overall the cycle parking provision is London Plan compliant as the shortfall in short stay parking is balanced against an over-provision of long stay parking in the basement. The split between long and short stay needs to be revisited in order to ensure that the type of cycle parking as well as the amount of cycle parking
is fully compliant. A contribution of £135,000 is sought to extend cycle hire docking facilities on Blackfriars Road and two years membership to the cycle hire scheme should be provided for each residential unit. The coach bay, whilst supported in principle, would require the relocation of the pedestrian crossing closer to the junction of Stamford Street and Blackfriars Road and this could have an impact on capacity. TfL request that the taxi spaces on Paris Gardens be reallocated as a taxi rank and there is a concern that these spaces do not align directly with the hotel lobby. TfL would encourage the removal of the non accessible car parking. The servicing strategy is broadly supported and should be secured in detail, alongside a construction logistics plan as part of the section 106 agreement.

Response – The requested contribution has been agreed with the applicant and would be secured in the legal agreement alongside the relevant plans and strategies. The remaining issues regarding on-street cycle parking and the taxi rank/coach bay are still under discussion and would be dealt with in full as part of the section 278 agreement.

Human rights implications

378. 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.

379. This application has the legitimate aim of providing a comprehensive redevelopment of the site to provide homes, offices, hotel, music venue and retail/restaurant space. 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

<table>
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<tr>
<th>Background Papers</th>
<th>Held At</th>
<th>Contact</th>
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<tr>
<td>Site history file: TP/1390-18</td>
<td>Chief Executive's</td>
<td>Planning enquiries telephone: 020 7525 5403</td>
</tr>
<tr>
<td>Application file: 16/AP/5239</td>
<td>Department</td>
<td>Planning enquiries email:</td>
</tr>
<tr>
<td>Southwark Local</td>
<td>160 Tooley Street</td>
<td><a href="mailto:planning.enquiries@southwark.gov.uk">planning.enquiries@southwark.gov.uk</a></td>
</tr>
<tr>
<td>Development Framework</td>
<td>London</td>
<td></td>
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<tr>
<td>and Development Plan Documents</td>
<td>SE1 2QH</td>
<td>Case officer telephone: 020 7525 5365</td>
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<tr>
<td></td>
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<td>Council website: <a href="http://www.southwark.gov.uk">www.southwark.gov.uk</a></td>
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APPENDICES

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<tr>
<th>No.</th>
<th>Title</th>
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<tbody>
<tr>
<td>Appendix 1</td>
<td>Consultation undertaken</td>
</tr>
<tr>
<td>Appendix 2</td>
<td>Consultation responses received</td>
</tr>
<tr>
<td>Appendix 3</td>
<td>Recommendation</td>
</tr>
</tbody>
</table>

AUDIT TRAIL

<table>
<thead>
<tr>
<th>Lead Officer</th>
<th>Simon Bevan, Director of Planning</th>
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<tr>
<td>Report Author</td>
<td>Terence McLellan, Team Leader</td>
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<tr>
<td>Version</td>
<td>Final</td>
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<td>Dated</td>
<td>6 July 2017</td>
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<tr>
<td>Key Decision</td>
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CONSULTATION WITH OTHER OFFICERS / DIRECTORIES / EXECUTIVE MEMBER

<table>
<thead>
<tr>
<th>Officer Title</th>
<th>Comments sought</th>
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<tbody>
<tr>
<td>Strategic Director of Finance and Governance</td>
<td>No</td>
<td>No</td>
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<tr>
<td>Strategic Director, Environment and Social</td>
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<td>No</td>
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<td>Regeneration</td>
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<td>Strategic Director of Housing and Modernisation</td>
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<td>Director of Regeneration</td>
<td>No</td>
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**Date final report sent to Constitutional Team** 7 July 2017
APPENDIX 1

Consultation undertaken

Site notice date: 18/05/2017
Press notice date: 11/05/2017
Case officer site visit date: n/a
Neighbour consultation letters sent: 19/01/2017

Internal services consulted:

Ecology Officer
Economic Development Team
Environmental Protection Team Formal Consultation (Noise/Air Quality/Land Contamination/Ventilation]
Flood and Drainage Team
HIGHWAY LICENSING
Highway Development Management
Housing Regeneration Initiatives
Ruth Wallis - Director of Public Health
Waste Management

Statutory and non-statutory organisations consulted:

Arqiva - digital communications
BAA - Safeguarding
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]
EDF Energy
Environment Agency
Greater London Authority
Historic England
London Borough of Camden
London Borough of Islington
London Borough of Lambeth
London Borough of Lewisham
London Borough of Tower Hamlets
London City Airport
London Fire & Emergency Planning Authority
London Underground Limited
Metropolitan Police Service (Designing out Crime)
Neighbour and local groups consulted:

Flat 21 Quadrant House SE1 0UW  
Railway Arch 84 Scoresby Street SE1 0XN

Flat 22 Quadrant House SE1 0UW  
Part Basement And Ground Floor 58-60 Stamford Street SE1 9LX

Flat 2 Quadrant House SE1 0UW  
Basement Ground First To Third Floors Sungard Court Sungard Court SE1 8ND

Flat 20 Quadrant House SE1 0UW  
Fourth Floor Sungard Court SE1 8ND

Flat 23 Quadrant House SE1 0UW  
Basement To Ground Floor 209-215 Blackfriars Road SE1 8NL

Flat 26 Quadrant House SE1 0UW  
Unit 505 Enterprise House SE1 9PG

Flat 27 Quadrant House SE1 0UW  
Unit 506 Enterprise House SE1 9PG

Flat 24 Quadrant House SE1 0UW  
Unit 411 Enterprise House SE1 9PG

Flat 25 Quadrant House SE1 0UW  
Unit 504 Enterprise House SE1 9PG

Flat 19 Quadrant House SE1 0UW  
Unit 508 Enterprise House SE1 9PG

Flat 12 Quadrant House SE1 0UW  
Unit 509 Enterprise House SE1 9PG

Flat 13 Quadrant House SE1 0UW  
Unit B04 Enterprise House SE1 9PG

Flat 10 Quadrant House SE1 0UW  
Unit 201 Enterprise House SE1 9PG

Flat 11 Quadrant House SE1 0UW  
Unit 202 Enterprise House SE1 9PG

Flat 14 Quadrant House SE1 0UW  
Unit 410 Enterprise House SE1 9PG

Flat 17 Quadrant House SE1 0UW  
Unit 402 Enterprise House SE1 9PG

Flat 18 Quadrant House SE1 0UW  
Unit 403 Enterprise House SE1 9PG

Flat 15 Quadrant House SE1 0UW  
Flat 12a 25 Broadwall SE1 9PS

Flat 16 Quadrant House SE1 0UW  
Unit 401 Enterprise House SE1 9PG

Flat 6 Quadrant House SE1 0UW  
Unit 404 Enterprise House SE1 9PG

Flat 7 Quadrant House SE1 0UW  
Unit 408 Enterprise House SE1 9PG

Flat 4 Quadrant House SE1 0UW  
Unit 409 Enterprise House SE1 9PG

Flat 5 Quadrant House SE1 0UW  
Unit 405 Enterprise House SE1 9PG

Flat 8 Quadrant House SE1 0UW  
Unit 406 To Unit 407 Enterprise House SE1 9PG

10 Rotherham Walk London SE1 0XE  
Part First Floor West Friars Bridge Court SE1 8NZ

11 Rotherham Walk London SE1 0XE  
First Floor Thameslink Friars Bridge Court SE1 8NZ

Flat 9 Quadrant House SE1 0UW  
Eighth Floor Friars Bridge Court SE1 8NZ

1 Rotherham Walk London SE1 0XE  
Part Ground Floor Connex Southern Eastern Friars Bridge Court SE1 8NZ

Flat 36 Quadrant House SE1 0UW  
Part Fifth Floor Kitchen Friars Bridge Court SE1 8NZ

Flat 3 Quadrant House SE1 0UW  
Unit 307 Enterprise House SE1 9PG

Flat 30 Quadrant House SE1 0UW  
Part Basement And Part Ground Floor 58-60 Stamford Street SE1 9LX

Flat 28 Quadrant House SE1 0UW  
Part Fifth Floor Friars Bridge Court SE1 8NZ

Flat 29 Quadrant House SE1 0UW  
Fifth Floor Friars Bridge Court SE1 8NZ

Flat 31 Quadrant House SE1 0UW  
Part Basement Restaurant Friars Bridge Court SE1 8NZ

Flat 34 Quadrant House SE1 0UW  
Unit 101 Enterprise House SE1 9PG

Flat 35 Quadrant House SE1 0UW  
Unit 102 Enterprise House SE1 9PG

Flat 32 Quadrant House SE1 0UW  
First Floor 42-44 Dolben Street SE1 0UQ

Flat 33 Quadrant House SE1 0UW  
Ground Floor 42-44 Dolben Street SE1 0UQ

10 Friars Close Bear Lane SE1 0UJ  
Unit 301 Enterprise House SE1 9PG

11 Friars Close Bear Lane SE1 0UJ  
Unit 304 Enterprise House SE1 9PG

8 Nicholson Street London SE1 0XP  
Unit 306 Enterprise House SE1 9PG

1 Friars Close Bear Lane SE1 0UJ  
Unit 302 Enterprise House SE1 9PG

12 Friars Close Bear Lane SE1 0UJ  
Unit 303 Enterprise House SE1 9PG

15 Friars Close Bear Lane SE1 0UJ  
First Floor 209-215 Blackfriars Road SE1 8NL

16 Friars Close Bear Lane SE1 0UJ  
Third Floor 52-54 Stamford Street SE1 9LY

13 Friars Close Bear Lane SE1 0UJ  
242b Blackfriars Road London SE1 9UF

14 Friars Close Bear Lane SE1 0UJ  
Arches 3a And 3d Burrell Street SE1 0UL

6 Nicholson Street London SE1 0XP  
And 14 11-11a Enterprise House SE1 9PG
10 Nicholson Street London SE1 0XP  Part Basement Friars Bridge Court SE1 8NZ
12 Nicholson Street London SE1 0XP  Unit 305 To 305a Enterprise House SE1 9PG
8 Brinton Walk London SE1 0XD  Excluding Part First Floor Chadwick Court SE1 8DJ
9 Brinton Walk London SE1 0XD  Office 242 Blackfriars Road SE1 9UF
14 Nicholson Street London SE1 0XP  Second Floor Bastille Court SE1 8ND
2 Nicholson Street London SE1 0XP  Third Floor Bastille Court SE1 8ND
4 Nicholson Street London SE1 0XP  Third To Fourth Floor Friars Bridge Court SE1 8NZ
16 Nicholson Street London SE1 0XP  Rear Of Ludgate House SE1 8NW
18 Nicholson Street London SE1 0XP  Versailles Court 3 Paris Garden SE1 8ND
4 Friars Close Bear Lane SE1 0UJ  First Floor 52-54 Stamford Street SE1 9LX
5 Friars Close Bear Lane SE1 0UJ  Basement 52-54 Stamford Street SE1 9LX
26 Friars Close Bear Lane SE1 0UJ  Seventh Floor Sea Containers House SE1 9PD
3 Friars Close Bear Lane SE1 0UJ  Eight Floor Sea Containers House SE1 9PD
6 Friars Close Bear Lane SE1 0UJ  Second Floor Left South Wing Sea Containers House SE1 9PN
9 Friars Close Bear Lane SE1 0UJ  Second Floor Right South Wing Sea Containers House SE1 9PN

Flat 1 Quadrant House SE1 0UW  Multisports Courts Hatfields SE1 8ND
7 Friars Close Bear Lane SE1 0UJ  Second To Fourth Floor Rennie House SE1 8DL
8 Friars Close Bear Lane SE1 0UJ  Apartment 2801 55 Upper Ground SE1 9EY
25 Friars Close Bear Lane SE1 0UJ  Apartment 2802 55 Upper Ground SE1 9EY
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22 Friars Close Bear Lane SE1 0UJ  Apartment 2811 55 Upper Ground SE1 9EY
12 Rotherham Walk London SE1 0XE  Ground Floor 52-54 Stamford Street SE1 9LY
7 Friars Close Bear Lane SE1 0UJ  Apartment 2812 55 Upper Ground SE1 9EY
7 Burrell Street London SE1 0UN  Apartment 2813 55 Upper Ground SE1 9EY
7 Friars Close Bear Lane SE1 0UJ  Apartment 2814 55 Upper Ground SE1 9EY
8 Friars Close Bear Lane SE1 0UJ  Apartment 2815 55 Upper Ground SE1 9EY
25 Friars Close Bear Lane SE1 0UJ  Apartment 2816 55 Upper Ground SE1 9EY
9 Friars Close Bear Lane SE1 0UJ  Apartment 2817 55 Upper Ground SE1 9EY

Flat 12 Edward Edwards House SE1 0XL Apartment 2105 55 Upper Ground SE1 9EY
Flat 13 Edward Edwards House SE1 0XL Apartment 2106 55 Upper Ground SE1 9EY
6 Rotherham Walk London SE1 0XE Apartment 2103 55 Upper Ground SE1 9EY
15 Rotherham Walk London SE1 0XE Apartment 2104 55 Upper Ground SE1 9EY
16 Rotherham Walk London SE1 0XE Apartment 2201 55 Upper Ground SE1 9EY
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Flat 6 56 Stamford Street SE1 9LX
Flat 3 56 Stamford Street SE1 9LX
Flat 5 56 Stamford Street SE1 9LX
Flat 7 56 Stamford Street SE1 9LX
West Wing Twelfth And Thirteenth Floor Sea Containers House SE1 9PD
Ground Floor 56 Stamford Street SE1 9LX
Second Floor 52-54 Stamford Street SE1 9LX
Flat 2 56 Stamford Street SE1 9LX
Part Second Floor South Ludgate House SE1 8NW
Part Second Floor North Ludgate House SE1 8NW
First Floor To Fourth Floor 58-60 Stamford Street SE1 9LX
Part Arch 5 And Arches 6 To 6b Burrell Street SE1 0UL
Unit 107 Enterprise House SE1 9PG
Living Accommodation 25 Stamford Street SE1 9NT
Flat 1 56 Stamford Street SE1 9LX
Flat 6 Block K Peabody Estate SE1 8AS
Flat 4 Block K Peabody Estate SE1 8AS
Flat 10 Block H Peabody Estate SE1 8AP
Flat 8 Block L Peabody Estate SE1 8AR
Flat 14 Block E Peabody Estate SE1 8AL
13 Clinkstand House Duchi Street SE1 8AF
Flat 1 Block B Peabody Estate SE1 8AQ
Flat 3 Block A Peabody Estate SE1 8AG
87 Roupell Street London SE1 8SU
19 Clinkstand House Duchi Street SE1 8AF
Flat 10 Block F Peabody Estate SE1 8AN
10 Clinkstand House Duchi Street SE1 8AF
82 Roupell Street London SE1 8SU
Flat 13 Block K Peabody Estate SE1 8AS
Flat 6 Block M Peabody Estate SE1 8DR
Flat 20 57 Stamford Street SE1 9DJ
Flat 21 57 Stamford Street SE1 9DJ
Flat 2 57 Stamford Street SE1 9DJ
Flat 75 Roupell Street London SE1 8SP
Flat 37 57 Stamford Street SE1 9DJ
Flat 43 57 Stamford Street SE1 9DJ
Flat 44 57 Stamford Street SE1 9DJ
Flat 45 57 Stamford Street SE1 9DJ
84 Rennie Court 11 Upper Ground SE1 9NZ
86 Peabody Estate Duchi Street SE1 8DR
32 Rennie Court 11 Upper Ground SE1 9LP
Flat 8 Rennie Court 11 Upper Ground SE1 9LP
73 Rennie Court 11 Upper Ground SE1 9NZ
Flat 7 Rennie Court 11 Upper Ground SE1 9LP
6 Rennie Court 11 Upper Ground SE1 9LP
Apt 10 235 Blackfriars Road SE1 8NW
14 Rennie Court 11 Upper Ground SE1 9LP
2 Whitley St London SE1 8SZ
35 River Court Upper Ground SE1 9PE
34 River Court London SE1 9PE
Flat 72 Rennie Court 11 Upper Ground SE1 9NZ
6 Warren Gardens Orpington BR6 6JD
72 River Court Upper Ground SE1 9PB
85a Stamford Street London SE1 9NB
73 Roupell Street London SE1 8SS
69b Stamford Street London SE1 9NB
73 Roupell Street London SE1 8SS
16 Coin Street London SE1 9NS
Flat 3 Draper House 20 Elephant And Castle SE1 6SX
Matrix Chambers Gray’S Inn WC1R 5LN
21 Whitley St London SE185Z
64 Roupell Street London SE1 8SS
4 Henry House Coin Street SE1 8YE
20 Roupell Street London SE1 8SP
Marshall House 66 Newcomen Street SE1 1YT
25 Cornwall Road London SE1 8TW
42 Rennie Court London SE1 9LP
Coin Street Centre Trust And Colombo Street Community & Sports Centre SE1 9NH
24 Grange Road Lewes BN7 1TS

Re-consultation: 18/05/2017
APPENDIX 2

Consultation responses received

Internal services

Economic Development Team
Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]

Statutory and non-statutory organisations

City of Westminster
Environment Agency
Greater London Authority
Historic England
London Fire & Emergency Planning Authority
London Underground Limited
Nats Limited, Safeguarding Office
Natural England - London Region & South East Region
Network Rail (Planning)
Port of London Authority
Royal Borough of Greenwich
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbours and local groups

Apt 10 235 Blackfriars Road SE1 8NW
Coin Street Centre Trust And Colombo Street Community & Sports Centre SE1 9NH
Flat 1 Block B Peabody Estate SE1 8AQ
Flat 15 Rennie Court SE1 9LP
Flat 19 Rennie Court SE1 9LP
Flat 3 Draper House 20 Elephant And Castle SE1 6SX
Flat 3 Rennie Court SE1 9LP
Flat 3 Rennie Court SE1 9LP
Flat 42 Rennie Court SE1 9LP
Flat 47 River Court SE1 9PE
Flat 50 Rennie Court SE1 9LP
Flat 6 Rennie Court 11 Upper Ground SE1 9LP
Flat 63 Rennie Court SE1 9NZ
Flat 63 Rennie Court SE1 9NZ
Flat 63 Rennie Court SE1 9NZ
Flat 7 Rennie Court 11 Upper Ground SE1 9LP
Flat 72 Rennie Court SE1 9NZ
Flat 72 Rennie Court 11 Upper Ground SE1 9NZ
Flat 73 Rennie Court SE1 9NZ
Flat 8 Rennie Court 11 Upper Ground SE1 9LP
Flat 95 Rennie Court SE1 9NZ
Marshall House 66 Newcomen Street SE1 1YT
Matrix Chambers Gray’S Inn WC1R 5LN
Pg 54 6 Paris Garden SE1 8DJ
14 Rennie Court 11 Upper Ground SE1 9LP
16 Coin Street London SE1 9NS
2 Whittlesey St London SE1 8SZ
20 Roupell Street London SE1 8SP
21 Whittlesey St London SE18SZ
24 Grange Road Lewes BN7 1TS
25 Cornwall Road London SE1 8TW
32 Rennie Court 11 Upper Ground SE1 9LP
34 River Court London SE1 9PE
35 River Court Upper Ground SE1 9PE
4 Henry House Coin Street SE1 8YE
42 Rennie Court London SE1 9LP
6 Warren Gardens Orpington BR6 6JD
6m Peabody Estate Duchy Street SE1 8DR
64 Roupell Street London SE1 8SS
69b Stamford Street London SE1 9NB
72 River Court Upper Ground SE1 9PB
73 Rennie Court 11 Upper Ground SE1 9NZ
73 Roupell Street London SE1 8SS
73 Roupell Street London SE1 8SS
84 Rennie Court 11 Upper Ground SE1 9NZ
84 Rennie Court 11 Upper Ground SE1 9NZ
85a Stamford Street London SE1 9NB