Item No. 7.1	Classification: Open	<b>Date:</b> 7 Novem	ber 2017	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 17/AP/1959 for: Full Planning Application  Address: 14-21 RUSHWORTH STREET, LONDON, SE1 0RB  Proposal: Construction of a new part five, part six storey building to provide commercial floorspace (Use Class B1), associated servicing, cycle parking and landscaping.			
Ward(s) or groups affected:	Cathedrals			
From:	Director of Planning			
Application S	Application Start Date 14/06/2017 Application Expiry Date 13/09/2017			n Expiry Date 13/09/2017
Earliest Decision Date 30/07/2017				

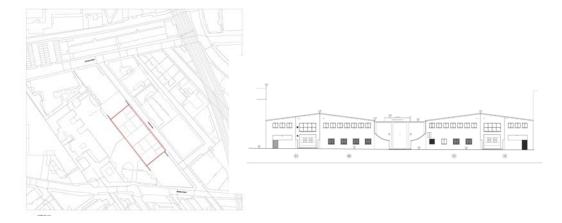
## **RECOMMENDATION**

- 1. a) That planning permission be granted, subject to conditions and the applicant entering into a satisfactory legal agreement.
  - b) In the event that a satisfactory legal agreement is not entered into by 31 January 2018 that the Director of Planning refuses planning permission, if appropriate, for the reason set out in paragraph 105 of the officer report.

## **BACKGROUND INFORMATION**

# Site location and description

2. The site is located on the south-western side of Rushworth Street, to the east of Blackfriars Road. It comprises two, two storey brick buildings known as Friars Court which are used for light industrial purposes. There is an off street service and parking area between the two buildings, accessed directly from Rushworth Street. The building is currently occupied by a courier company, a media company, a catering company and as an artist studio/storage unit. There are no trees on the site or on the adjacent highway.



Site Plan and Existing Elevation

- 3. The surrounding area contains a mix of uses including residential, commercial and educational. Immediately adjoining to the north is 10-13 Rushworth Street, a recently constructed 5 storey building providing offices on the basement, ground and first floors and residential above. To the south, at 24-28 Rushworth Street/61 Webber Street, is a part 3, part 4 storey office building which also has a frontage onto Webber Street. It is known as the Colorama Building and has an extant planning permission for redevelopment. Opposite the site on the other side of Rushworth Street are two residential buildings known as Chadwick House and Ripley House, both of which are Grade II listed. Also opposite, at 33-38 Rushworth Street is a two storey brick building occupied by St Mungo's charity. At 40 Rushworth Street is a site recently redeveloped as a five storey building for commercial use on the lower floor and 9 flats above. A further residential building exists to the south, fronting onto Webber Street, known as Waterloo Mansions. To the west is the Friars Primary School whose playground abuts the boundary of the application site.
- 4. The site is not within a designated conservation area, but lies immediately opposite the Kings Bench Conservation Area.

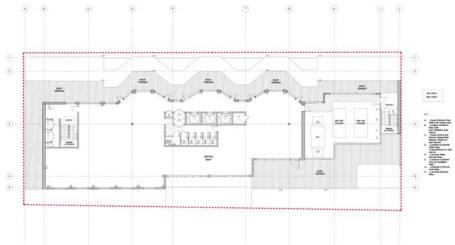
# **Details of proposal**

5. The proposal is for a new six storey plus basement office building to provide 8,504sqm of office floorspace. The building would be six storeys high with set backs at 4<sup>th</sup> and 5<sup>th</sup> floor levels. The building would be predominantly constructed in brick, with projecting bays onto Rushworth Street. It would have one main office entrance on Rushworth Street with two sets of secondary doors. A small rear courtyard and rooflights would provide daylight to the basement offices. The proposal does not include any car parking. The refuse, cycle and changing facilities would be located at basement level. A single loading bay would be provided within the ground floor of the development. Balconies and terraces would be provided from 1<sup>st</sup> to 5<sup>th</sup> floor levels.



#### Front Elevation

- 6. In 2016 the Council granted planning permission to redevelop the site for a building up to six storeys high providing office/commercial space at basement, ground and part of the first floor level, and 47 residential flats above. Like the current application this building was arranged as four floors onto the street with two further set back floors, and constructed in brick with vertical bays on the frontage. The main differences between the approved scheme (15/AP/4000) and the current application are as follows:
  - The current proposal is entirely for office/commercial use;
  - The building is taller than that previously approved (by 2.28 metres at the front parapet line, and 2.66 metres maximum)
  - The alignment of the building at the rear has been simplified, with the closest elements pulled further away from the playground boundary, but with a shallower central recess;
  - The 6<sup>th</sup> storey extends further across the length of the building.
- 7. Revised drawings were submitted during the course of the application to make the following changes:
  - The height of the building was very slightly reduced to improve daylight for the residents in Ripley and Chadwick House;
  - The parapet design above the third floor on the Rushworth Street frontage was changed from brick to railing to lighten its appearance and further improve light levels;
  - The 6<sup>th</sup> storey has been set in from the north side of the building to reduce the apparent massing; and
  - The stair enclosure at the southern end of the 6<sup>th</sup> storey has been removed to reduce the massing on this part of the building.
- 8. The above changes were made to improve daylight levels of the residents of Chadwick House and Ripley House, and have also slightly benefitted residents of 10-13 Rushworth Street and Waterloo Mansions.



Top Floor

9. In addition, green roofs were introduced, and the railing details on the front elevation set slightly back to reduce their prominence on the elevations.

## **Planning history**

- 10. 15/AP/4000 Planning permission granted with legal agreement on 31 March 2016 for the erection of a new part five, part six storey building to provide commercial floorspace at lower ground, ground and first floor level (Use Class B1) and 47 residential units (Use Class C3) on first to fifth floor levels, associated disabled car parking, cycle parking and landscaping.
- 11. 16/AP/0444 Prior approval granted on 23 March 2016 for demolition of the existing buildings.
- 12. Pre-application advice was provided in advance of the application. A number of meetings were held with the applicant prior to the submission of this application. The discussions centred around the quality of the office provision, the acceptability of the design, the daylight impact to neighbouring properties and servicing.

## Planning history of adjoining sites

#### 10-13 Rushworth Street

13. 13/AP/0943 Planning permission granted with legal agreement on 2 July 2013 for the Demolition of existing building and erection of a five storey plus basement building comprising of office floorspace (B1) on lower ground, ground and first floors with 9 (3x 1 beds, 4x 2 beds, 2x 3 beds) residential apartments above, amenity space, refuse/recycling stores, cycle storage and plant/equipment. This development has now been completed.

## 24-28 Rushworth Street and 61 Webber Street

14. 15/AP/2705 Planning application granted with legal agreement on 4 August 2016 for the Demolition of the existing building and erection of part six part eight storey (plus basement) mixed use building comprising 40 residential units (15 x 1 bed, 18

x 2 bed & 7 x 3 bed) (use class C3) and 2241 sqm (GIA) flexible commercial space (use class B1) and associated works. This development has not yet commenced.

## 40 Rushworth Street

15. 13/AP/4404 Planning permission granted with legal agreement on 2 May 2014 for the construction of a ground plus three/four storey building to provide 1163 sqm (GEA) of Class B1 employment floorspace and nine residential units comprising 5 x 2 bedroom apartments and 4 x 3 bedroom maisonettes, shared courtyard and garden space, ancillary plant and equipment. This development is complete.

#### **KEY ISSUES FOR CONSIDERATION**

## **Summary of main issues**

- 16. The main issues to be considered in respect of this application are:
  - i) principle of the proposed development in terms of land use;
  - ii) design issues including acceptability of height and massing;
  - iii) impact on the amenities of occupiers of adjoining properties, particularly in traffic issues including servicing;
  - v) flood risk:
  - vi) planning obligations; and
  - vii) sustainable development implications.

## Planning policy

- 17. The statutory development plan for the borough comprises the London Plan 2016, the Southwark Core Strategy 2011, and saved policies of the Southwark Plan (2007). The site falls within the area covered by the Blackfriars Road SPD 2014.
- 18. The site is located within the:
  - Central Activities Zone (CAZ)
  - Bankside, Borough and London Bridge Opportunity Area
  - Air Quality Management Area
  - Borough and Bankside District Town Centre
  - Blackfriars Road SPD area
- 19. It has a Public Transport Accessibility Level (PTAL) of 6b where 1 is the lowest level and 6b the highest, indicating excellent access to public transport.
- 20. The following Grade II listed buildings are opposite the site:
  - Ripley House, Rushworth Street; and
  - Chadwick House, Rushworth Street.
- 21. The site falls outside of a designated conservation area, but lies immediately opposite the Kings Bench Conservation Area.

# National Planning Policy Framework (the Framework)

22. The NPPF came into effect on 27 March 2012 and is a material planning

#### consideration. Relevant sections are:

Section 1: Building a strong, competitive economy

Section 2: Ensuring the vitality of town centres

Section 4: Promoting sustainable development

Section 7: Requiring good design

Section 10: Meeting the challenge of climate change, flooding and coastal change

Section 12: Conserving and enhancing the historic environment

## The London Plan 2016

23.

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 4.1 Developing London's economy

Policy 4.12 Improving opportunities for all

Policy 5.1 Climate change mitigation

Policy 5.2 Minimising carbon dioxide emissions

Policy 5.3 Sustainable design and construction

Policy 5.7 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 5.21 Contaminated land

Policy 6.1 Strategic approach (Transport)

Policy 6.9 Cycling

Policy 6.10 Walking

Policy 6.13 Parking

Policy 7.3 Secured by design

Policy 7.4 Local character

Policy 7.5 Public realm

Policy 7.6 Architecture

## Core Strategy 2011

24.

The relevant policies of the Core Strategy are:

Strategic Targets Policy 1 - Achieving growth

Strategic Targets Policy 2 - Improving places

Strategic Policy 1 - Sustainable development

Strategic Policy 2 - Sustainable transport

Strategic Policy 10 - Jobs and businesses

Strategic Policy 11 - Open spaces and wildlife

Strategic Policy 12 - Design and conservation

Strategic Policy 13 - High environmental standards

Strategic Policy 14 - Implementation and Delivery

## Southwark Plan 2007 (July) - saved policies

25. The council's cabinet on 19 March 2013, as required by para 215 of the NPPF,

considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the Council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

## 26. The relevant policies include:

Policy 1.1 Access to Employment Opportunities

Policy 1.4 Employment Sites

Policy 1.7 Development within Town and Local Centres

Policy 2.5 Planning Obligations

Policy 3.1 Environmental Effects

Policy 3.2 Protection of Amenity

Policy 3.3 Sustainability Assessment

Policy 3.4 Energy Efficiency

Policy 3.6 Air Quality

Policy 3.7 Waste Reduction

Policy 3.9 Water

Policy 3.11 Efficient Use of Land

Policy 3.12 Quality in Design

Policy 3.13 Urban Design

Policy 3.14 Designing Out Crime

Policy 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites

Policy 3.28 Biodiversity

Policy 3.31 Flood Defences

Policy 5.1 Locating Developments

Policy 5.2 Transport Impacts

Policy 5.3 Walking and Cycling

Policy 5.6 Car Parking

Policy 5.7 Parking Standards for Disabled People and the Mobility Impaired

## Relevant SPDs/SPGs

27.

Section 106 Planning Obligations and CIL SPD 2015 and 2017 Addendum Draft Bankside, Borough and London Bridge SPD February 2010

Blackfriars Road SPD 2014

Use of planning obligations in the funding of Crossrail 2010

Kings Bench Conservation Area Appraisal 2010

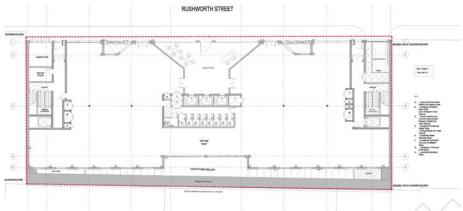
Central Activities Zone SPG 2016 (SPG to the London Plan)

#### Principle of development for office/business purposes

28. The site is currently in use for Class B1 purposes, and saved policy 1.4 'Employment site' of the Southwark Plan, and policy SP10 'Jobs and business' of the Core Strategy would require this floorspace to be re-provided in any redevelopment of the site. The 2016 planning permission (15AP400) replaced the 2,048sqm currently on site with a small uplift to 2,566sqm. It then provided residential flats on the upper floors. The site owners (Taylor Wimpy Central London) have recognised the increased demand for commercial space in Bankside

and now wish to pursue an option of a fully commercial scheme.

- 29. The site is located within the Bankside, Borough and London Bridge Opportunity Area, as designated by the London Plan. The London Plan supports office developments and employment generating uses in the Opportunity Area.
- 30. The site is also located within the CAZ which covers a number of central boroughs and contains 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.
- 31. The site is also within the Borough and Bankside District Town Centre where saved policy 1.7 of the Southwark Plan states that within the centre, developments will be permitted providing a range of uses, including employment uses.
- 32. 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 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.
- 33. The Blackfriars Road SPD was adopted in 2014. It states that opportunities to increase the amount and type of development will be maximised, particularly opportunities for business space which is designed flexibly to accommodate a range of unit sizes. The SPD also requires existing business floorspace to be retained or replaced.
- 34. The policies for this area therefore clearly support schemes which can expand business floorspace and harness the potential for new jobs. The current application would provide 8,438sqm (GIA) of business space, a very significant uplift on the current floorspace, and that provided in the 2016 permission. This is a very positive aspect of the scheme, and would reinforce the role of Bankside as a major employment hub for a diverse range of business types.
- 35. The office space has been provided with one large main entrance and two further secondary entrances and is capable of being used by a range of small to medium sized businesses. It has the potential to be used flexibly either for a single large occupier, or subdivided into smaller units. The office workers would have access to amenity space in the form of a small courtyard at rear basement level as well as terraces/balconies fronting Rushworth Street. Depending on the configuration of the internal spaces, the building could provide up to 800 jobs, a very significant uplift on the c20 people currently employed on the site.



Ground Floor

- 36. The scheme has not included retail or other A Class uses which are often provided to enliven the ground floor frontages of commercial schemes. Although the site is within the large area of north Southwark defined as a town centre, it is not a street with a high level of footfall and retail uses may not be viable or appropriate here. Given the desire to reinforce the nearby Blackfriars Road as a focus for shops and services the absence of retail on this site is acceptable.
- 37. The permitted scheme included 47 flats, including affordable units, which would not be provided under the current proposal. Over recent years there have been a large number of schemes across north Southwark which have sought to maximise new residential rather than office or commercial floorspace. In order to meet the targets for new employment space a balance has to be struck with the clear need for new housing. In this case, the site is in an area which could be attractive to smaller businesses which are contributing to the character and economic diversity of Bankside. As such, the loss of potential new residential units is acceptable.
- 38. In conclusion, the creation of an entirely commercial building is welcomed here and is in accordance with adopted policy.

## **Environmental impact assessment**

- 39. No request under Regulation 5 of the Town and Country Planning (EIA) (England) Regulations 2011 (as amended) has been submitted seeking confirmation as to whether the proposed development would require an environmental impact assessment. It is noted that the 2015 EIA regulations raise and amend the thresholds at which certain types of development project will need to be screened in order to determine whether an environmental impact assessment is required. The development could be considered an urban development project under schedule 2 of the regulations.
- 40. In the case of urban development projects, the 2015 regulations raised and amended the 0.5 hectare threshold such that a project will need to be screened if:
  - the development includes more than 1 hectare of development which is not dwellinghouse development; or
  - the development includes more than 150 dwellinghouses; or
  - the area of the development exceeds 5 hectares.

41. None of the above are applicable in this instance, therefore no screening is required and the proposal is not considered to comprise of EIA development.

## Design issues including acceptability of height and massing

42. The site currently comprises of two two-storey brick industrial units and a central parking and servicing area. Whilst it is not located in a conservation area, the buildings on the opposite side of Rushworth Street form part of the Kings Bench Conservation Area. Ripley House and Chadwick House opposite are both Grade II listed buildings. It is recognised that the existing buildings are of low architectural quality, and it is accepted that there is potential to develop the site and create a building which provides more interaction with the street, as well as responding appropriately to the Kings Bench Conservation Area and listed buildings. Prior approval was granted in March 2016 (16AP0444) to demolish the existing buildings, and the previous consent agreed the principle of redevelopment

# Height, scale and massing

- 43. The current proposal broadly retains the plan form of the previously consented mixed use scheme onto Rushworth Street with the main body of the building rising to four floors, with two further floors set back behind a parapet.
- 44. Like the consented scheme, the design attempt to break up the massing of this very long building frontage by the division of the block into 3 elements, two 'bookend' blocks and a central articulated block with three large bays that are designed to echo the architectural language of the listed building on the opposite side of the street.
- 45. To the rear of the site is the Friars Primary School. Where the consented scheme extended back to the party wall on the two wings with a set back central bay, the current application takes on a simple linear form which is more appropriate given its commercial use but does appear as a more singular form when viewed from the rear.
- 46. In terms of height, the building is now a total of 2.66m taller than the extant scheme, and 2.28m taller at the main parapet line to Rushworth Street. This is a direct consequence of the higher floor to ceiling heights required for the commercial use when compared to the previous residential floors. Commercial buildings generally have taller floor to ceiling heights to incorporate additional mechanical and electrical services, not normally necessary in residential units. This increase in height in the context of the consented scheme is not considered to harm to the setting of the conservation area or the setting of the listed buildings. The impact on the scale of the building on the amenity of neighbours is set out later in paragraphs 51 to 94 of this report.



# Elevation design

- 47. The front elevation of the building responds to the prevailing building height in the street with four storeys up to the parapet line. The visualisations provided with the application demonstrate that the narrow nature of Rushworth Street and the deep set back at the upper floors means that the upper most floors are less visible from the street. As a consequence, the building sits comfortably in this sensitive street frontage.
- 48. The composition is calm with a prominent and highly glazed frontage framing the base, a middle which is defined by the repeating pattern of the deep-set bays and balconies, and the upper-most floors which are set back. The proposal was amended during the course of the application to reduce the height of the brick parapet to the street to allow for railings to be introduced which reduces the apparent bulk of the building and gives the parapet a lighter edge. This amendment also addresses the comments made by the Conservation Area Advisory Group who felt that the upper storeys appeared too heavy.

# Materials

- 49. The use of brick as the principal facing material is appropriate for the context of the development, especially where it faces onto the conservation area. However, some of the 3D images give the impression that the brick work is rather dark and it should not be any darker than the high quality red brickwork of Ripley Buildings opposite. The choice of materials should be reserved by condition to ensure that the selected brick at the construction stage responds appropriately to the setting of the listed building and the character of the Conservation Area across the street.
- 50. Overall it is considered that the building would be of a high quality design which follows the principles of the consented scheme.

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

## Daylight

51. A daylight and sunlight report has been submitted as part of the application, based on the Building Research Establishments (BRE) guidelines on daylight and

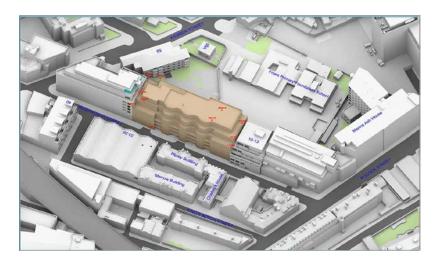
sunlight.

- 52. 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. However, it is generally accepted that the BRE is more directly applicable to a suburban-style pattern of development, and 27% will often not be achievable in densely built-up urban areas; the BRE acknowledges the limitations of the guidance in this respect. The BRE have determined that the daylight can be reduced by about 20% of their original value before the loss is noticeable.
- 53. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight may be affected.
- 54. Another method of calculation is the Average Daylight Factor (ADF) which is a more detailed assessment and considers the amount of sky visibility on the vertical face of a window, but also the window size, room size and room use. The recommendations for ADF in dwellings are 2% for kitchens, 1.5% for living rooms and 1% for bedrooms. The BRE recommends that whilst ADF is an appropriate measure for new buildings and master planned areas, VSC/NSL should be principally used to assess impact on existing buildings.
- 55. In addition, the BRE states that the analysis will usually only apply to habitable rooms, which exclude hallways, bathrooms and small kitchens.

## Sunlight

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

- 58. The remaining surrounding properties are either too far away to be affected by the proposed development or are in commercial use, where daylight and sunlight are less sensitive.
- 59. As referred to earlier in the report, the site benefits from an extant planning permission for a six storey building. The current application is also for a six storey building but it is higher by 2.28m at the parapet level and 2.66m at roof level, and the top floor extends across more of the roof area. The existence of the extant permission is a material consideration when determining the current application, since it remains capable of implementation. For that reason, the applicants have compared the impact of the current proposals with those of the permitted development, as well as with the existing situation.
- 60. The approved scheme did result in daylight losses to surrounding buildings with Chadwick House, Ripley House and Waterloo Mansions particularly affected. In determining that application, the Committee took into account a number of factors specific to the location including the dense urban environment, the narrow street, and the low height and the gap between the existing buildings. Accordingly, the existing light levels enjoyed by the residential properties which directly overlook the site, such as Ripley House, Chadwick House and Waterloo Mansions are relatively high for a central London location and consequently reductions in daylight and sunlight to neighbouring properties would occur if the site is redeveloped to a scale that is more consistent with other building heights on the street.
- 61. The daylight and sunlight reports submitted with the application showed impacts beyond those which would arise from the consented scheme. It is noted that loss of daylight was cited in objections received from neighbouring residents. The applicants therefore sought to make amendments to the application to address these concerns. Given the headroom needed within the commercial floors, there was limited scope to reduce the overall height of the building. However, changes were made which did slightly reduce the height of the ground floor, reduced the extent of the 6<sup>th</sup> floor, and replaced the solid brick parapet with an open railings. These changes cumulatively improved the daylight levels to rooms in Ripley House, Chadwick House and Waterloo Mansions, albeit not by a significant degree.
- 62. It is noted that the impact arises primarily from the four storey main body of the building and not the set back 5<sup>th</sup> and 6<sup>th</sup> storeys. It is therefore relevant to consider the appropriateness of this height in the streetscene, and relative to the heights of surrounding buildings. As set out above, it is concluded that the building would make a positive contribution to the townscape at the submitted height.

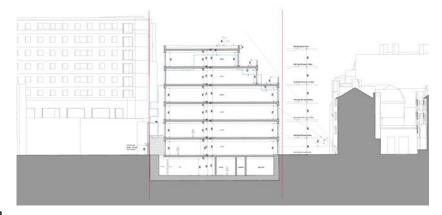


## Chadwick House

- 63. This property is located to the north-east of the site, on the opposite side of Rushworth Street and has residential windows at lower ground to second floor level. The property has a partial outlook over the site, towards the existing two storey buildings. In the approved scheme, there were 15 windows which would experience reductions in VSC of between 20% and 34%. Under the current proposals 17 windows experience losses above 20%, with losses of up to 43.5% when compared to current levels.
- 64. The daylight distribution analysis showed a less marked change from the consented scheme, and the rooms (all of which are bedrooms) would still retain adequate daylight when considered against the ADF methodology.
- 65. In terms of sunlight, the results show that only four rooms would retain less than the recommended 25% of sunlight hours. This is just one more than the approved scheme. All affected rooms are bedrooms. The worst affected room would retain 14% and the other three in excess of 17%. The impacts in relation to sunlight are therefore acceptable.

## Ripley House

- 66. This property is located on the eastern side of Rushworth Street, directly opposite the site. It contains residential accommodation from ground to third floor level. The floor plans for the building show that the living rooms in each of the flats face away from the site and the rooms facing the site are a mix of bedrooms, bathrooms and small kitchens. The plans also make clear that the bedrooms at ground floor level are served by two windows. The bathrooms have frosted glazing across the windows and since they are not habitable space, have not been included in the submitted daylight assessment. The kitchens are relatively small, comprising galley type rooms with floor areas that are less than 7.5sqm, and so are not considered habitable rooms for the purposes of the BRE.
- 67. The building enjoys an open outlook due to the relatively low scale massing of the existing buildings and the servicing area creating a gap in the middle. Under the consented scheme, this building would experience large losses of VSC of up to 50% VSC; under the current proposal 31 of the 33 windows assessed would experience losses above 20% VSC, with a maximum loss of 57.5%.



#### Section

- 68. The bedrooms in Ripley House all fall below the expected ADF standard for bedrooms, although the achieved levels of ADF are not significantly different than those found under the consented scheme.
- 69. The sunlight effect on this property is very similar to the approved scheme. The worst affected rooms are stated to be small kitchens, and would retain between 12% and 17% annual sunlight hours.

## 1-18 Merrow House

- 70. Merrow House is a residential building located to the rear of Ripley House but has a partial view of the proposed development on the upper floors and at the south-eastern end of the property, where windows look through the gap between Ripley House and 33-38 Rushworth Street.
- 71. Under the consented scheme, all windows here met the BRE guidelines in terms of having a reduction in VSC of less than 20%. Under the current proposals 4 of the 42 windows experience losses of VSC above 20% albeit only marginally. For the windows that would experience a change the reductions are minimal and unlikely to be perceptible to residents.
- 72. In relation to sunlight, there is very little material loss beyond that agreed under the approved application. There are only two rooms where any further loss occurs and both of these rooms would retain 18% of total annual sunlight. The daylight and sunlight impacts to this property are therefore considered acceptable.



## Waterloo Mansions, 59 Webber Street

- 73. This property is located to the south-west of the site, fronting Webber Street and contains residential accommodation across four floors. The building has a number of balconies overhanging the windows overlooking the application site. The floorplans indicate that the overhung windows are living rooms and in one instance a kitchen. The BRE guidelines recognise that windows below a balcony typically receive less daylight as the balcony cuts out light from the top part of the sky. The BRE guidelines also suggest that it is appropriate to carry out an additional calculation of the VSC without the balcony in place in order to understand the true impact of the development. Accordingly, the submitted assessment has included results with the balcony in place, and with the balcony removed.
- 74. Under the consented scheme, 18 of the 41 windows tested experienced losses above 20%. Under the current proposal, this would increase to 37 windows, with maximum losses of up to 53.9%.
- 75. For the few in this property that are relevant for sunlight analysis, the results show that there is no change whatsoever to the sunlight potential beyond that of the approved development.

#### 59A Webber Street

76. This property is located to the south west of the site and is currently in use as accommodation for the caretaker for the school. The analysis shows that all of the windows and rooms would only experience small losses in VSC beyond the consented scheme. There would be no further loss of sunlight beyond the approved scheme.

## 40 Rushworth Street

77. 40 Rushworth Street includes residential development at second floor level and above. The results show that the residential windows in this development would only experience very minor reductions when compared to the consented scheme, In relation to sunlight, there would be no further loss beyond the approved scheme. The daylight and sunlight impacts to this scheme are therefore considered acceptable.

## 10-13 Rushworth Street

78. This building is located adjacent to the site and has windows facing in a north-east and south-west direction with an oblique view of the development. The results show that there would be an improvement in the daylight amenity to many of the residential windows in this development when compared to the consented scheme. Where windows does experience a further loss, this in in the context of vey high levels of existing VSC, so the impact is not harmful. The scheme also has a satisfactory impact in relation to sunlight. The impacts to this building are therefore considered acceptable.

#### Friars Primary School

79. This building is located to the west of the site and has been assessed for daylight and sunlight due to the use of the building for educational use. Of the 75 windows tested only 13 experienced losses above 20% VSC, and in many cases these were multiple windows serving the same room, where the overall light levels in the room remained good. There would be no material loss in relation to sunlight, beyond the consented scheme. The impacts to this building are therefore considered acceptable.

## Manna Ash House

80. This property is located to the north west of the site and is used as student accommodation. It would have a partial view of the development. There would be a negligible loss of daylight to this property, and no material loss to the sunlight received by this building; with all rooms retaining 25% of annual sunlight hours. The impacts to this building are therefore considered acceptable.

## 61 Webber Street

81. This building is immediately adjacent to the southern boundary. The existing building is in commercial use but permission has been granted for a mixed use development including offices and residential. The daylight analysis shows full compliance with the BRE apart from one window which is a single aspect bedroom at sixth floor level. However, the NSL and ADF analysis show full compliance. In relation to sunlight, all windows meet the sunlight guidance. The impacts to this consented scheme are therefore acceptable.

## Conclusion on daylight and sunlight

- 82. The results of the daylight assessment reveal that there would be a number of rooms that would not meet the relevant daylighting standards of the BRE, with flats at Ripley House, Chadwick House and Waterloo Mansions particularly affected. The additional impacts arise due to the increase in height of the building of up to 2.28m. to the main parapet and 2.66m to roof level.
- 83. As discussed elsewhere in the report, the height of the development is considered acceptable and is of an appropriate massing in the streetscape. Rushworth Street is also a fairly narrow street, which has had an impact on the extent of daylight loss.
- 84. The reductions in daylight set out above are expressed in most cases as a percentage reduction of existing daylight levels (in terms of VSC). If these reductions were assessed in terms of <u>absolute retained</u> VSC (ie the amount of

daylight availability to the face of the window) then the impact of the new massing is less significant. The table below sets out the average retained VSC for the most affected buildings (Chadwick House, Ripley House and Waterloo Mansions)

	Average Re		
	Consented scheme	Current Proposal	Variance
Ripley Building	16.81%	14.86%	1.95%
Chadwick House	17.2%	15.86%	1.34%
Waterloo Mansions	20.99%	18.70%	2.29%

85. Amendments were received during the course of the application which led to some improvements to the daylight to the above buildings. It is recognised that the existing levels of light enjoyed by the surrounding properties is untypical for a central London area due to the very low height of the existing industrial buildings. Weight must be given to the impact of the consented scheme, and the need to optimise the use of land in a highly accessible location. Given that the proposed building is of a scale that is appropriate in the townscape, and that the narrow street is part of the established character of the area, on balance the impact in terms of daylight and sunlight is acceptable. The neighbour objection in relation to daylight is noted, as are the small changes made by the applicant to mitigate the impacts. It is recommended that daylight and sunlight impacts should not be a reason to withhold planning permission given the wider benefits of the development.

## Sun on ground

- 86. A sun on ground overshadowing analysis has been carried out to establish the effect of the proposed development on adjoining external amenity areas. The BRE guidelines recommend that on 21<sup>st</sup> March ideally at least 50% of any given amenity area should receive 2 hours of sunlight.
- 87. The principle amenity space surrounding the site is the Friars Primary School playground. With the proposed development in place, the playground would have 98.3% of its area receiving at least 2 hours of sun on 21<sup>st</sup> March. Therefore the proposal meets the BRE recommendations.
- 88. The four adjoining terraces belonging to the 10-13 Rushworth Street development have also been considered for sun on ground. The analysis shows that all four terraces would retain in excess of 50% of their area receiving 2 hours of sun on 21<sup>st</sup> March. This would be in accordance with the recommendations of the BRE.

## Overlooking/outlook

89. 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.

- 90. Across Rushworth Street, there would be a distance of 10m to Ripley and Chadwick House, which falls 2m short of the expected 12m at the front of the building and across a street. Rushworth Street is fairly narrow, and building line of the proposed development is consistent with buildings either side of it. The building has been set back slightly behind the line of the existing buildings, and that of 10-13 Rushworth Street. Setting the building back by a further 2 metres would be inappropriate in this townscape, and in this context the distance to the facing windows is acceptable, and reflects the distance between opposing windows elsewhere in the street.
- 91. To the south-west, there would be an approximate 11m distance to Waterloo Mansions at 59 Webber Street, falling short of the required 21m. However the windows on the proposed development would not directly look onto the mansion block, being orientated such that they would face predominantly west rather than south west. Accordingly, it is not considered that the proposed development would give rise to any significant harmful impacts by way of loss of privacy.
- 92. To the west, there would be almost 25m to the Friars Primary School, achieving compliance. The building does overlook the school playground, but this relationship is not unusual in central London locations and is replicated in several recent developments in Southwark.
- 93. There are no directly facing windows to the north, but some balconies and terraces belonging to the flats at 10-13 Rushworth Street do exist on the shared boundary; however it is not felt that there would be significant overlooking here due to the differences in level. An occupier of 10-13 Rushworth Street has objected to the impact on light and view/outlook from the terraces. The building in its proposed form is higher than the permitted scheme, but the upper floors are set slightly further back at the rear which mitigates the impact of the additional height.
- 94. In conclusion, whilst the overlooking distances to Ripley House, Chadwick House and Waterloo Mansions would not be achieved, factors such as the narrow street width and orientation of the windows would make the development acceptable in this regard.

#### <u>Noise</u>

95. The noise impacts from the site would be highest during the demolition of the existing buildings, the basement excavation and substructure works. Traffic noise from construction would increase noise levels, however these impacts would be short term in nature. When considering the existing (light industrial) warehouse, the proposed development could be considered as a less noisy form of development, although it is accepted that there would be more comings and goings because of the increase in workers. However it is unlikely that there would be any demonstrable harm caused to residential amenities from the increased movement. A condition will be attached to the recommendation to ensure that noise from plant and machinery would fall below background noise levels and therefore would protect residential amenities. Conditions are also recommended in relation to construction management and servicing and delivery hours.

## **Transport issues**

96. Saved policy 5.1 of the Southwark Plan seeks to ensure that development is located near transport nodes, or where they are not it must be demonstrated that sustainable transport options are available to site users, and sustainable transport is promoted. In addition, saved policy 5.6 of the Southwark Plan requires development to minimise the number of car parking spaces provided and include justification for the amount of car parking.

#### Public transport accessibility

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

## Servicing

98. Servicing is proposed directly from a new bay provided within the ground floor of the development. The provision of this bay within the site would reduce the impact of service and delivery vehicles stopping on Rushworth Street.

# Car parking

99. The proposal does not include any car parking and this is appropriate for this location.

## Cycling

- 100. The site is well served by designated cycle routes, Blackfriars Road and Southwark Street are part of the National Cycle Network and connect to Westminster Bridge to the west to the Cycle Super Highway on Southwark Bridge to the east.
- 101. The proposals include a basement bicycle store that can accommodate 84 bicycles and 21 foldable bike lockers. The level of provision is considered acceptable and in line with the latest Transport for London standards. The basement also provide showers and lockers for cyclists.

#### Flood Risk

- 102. The site is located in Flood Zone 3 which is defined as having a 'high probability' of river and sea flooding and accordingly the applicant has submitted a Flood Risk Assessment. The Environment Agency were consulted on the application but have not yet provided a response at the time of writing. It is recommended that the Director of Planning be authorised to attach any conditions they request to the decision notice.
- 103. The council's flood and drainage team have requested that a surface water drainage strategy condition be attached to the decision notice.

## Planning obligations (S.106 undertaking or agreement)

- 104. Saved policy 2.5 'Planning obligations' of the Southwark Plan and policy 8.2 of the London Plan advise that Local Planning Authorities should seek to enter into planning obligations to avoid or mitigate the adverse impacts of developments which cannot otherwise be adequately addressed through conditions, to secure or contribute towards the infrastructure, environment or site management necessary to support the development, or to secure an appropriate mix of uses within the development. Further information is contained within the Council's adopted planning obligations and community infrastructure levy SPD. A s106 agreement is currently being drafted which should include clauses to secure the following:
  - site specific highway works involving the repaving of the Rushworth Street footway, reinstatement of redundant vehicle crossings and formation of new; and
  - employment and training provisions during construction and in the completed development.
  - Contribution to Crossrail totalling £603,677.
- 105. In the event that a satisfactory legal agreement has not been entered into by 31 January 2018, it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:
- 106. The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of mitigation against the adverse impacts of the development through projects or contributions in accordance with saved policy 2.5 'Planning Obligations' of the Southwark Plan (2007), strategic policy 14 'Delivery and Implementation' of the Core Strategy (2011), policy 8.2 'Planning obligations' of the London Plan (2016), the 'Use of planning obligations in the funding of Crossrail SPD 2010 and the planning obligations and community infrastructure levy SPD (2015).

#### Sustainable development implications

## Carbon emissions and renewable technologies

107. London Plan Policy 5.2 requires a reduction in carbon emissions of 35% below Part L 2013 target. A detailed energy assessment has been submitted as part of the application to demonstrate how the targets for carbon dioxide emissions reduction are to be met. Overall, the development would achieve a carbon saving of 36%, which just exceeds the policy requirement. This has been achieved using passive measures and energy efficiency measures. A 9% renewable energy contribution is proposed with the use of photovoltaic panels to the roof area. The energy strategy is therefore acceptable and it is recommended that a condition be imposed to secure the details for the development.

#### BREEAM

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

Amended plans were submitted during the course of the application to introduce areas of green roofs, which will provide ecological and environmental benefits including a reduction from rainwater run off.

#### Other Matters

109. The site is not within an Archaeological Priority Zone, and the proposed new build is of limited below ground impact. In this instance the archaeological resource would be compromised by these works. Therefore no further archaeological assessment, fieldwork or conditions are required in consideration of this application.

# Mayoral and Southwark Community Infrastructure Levy (CIL)

- 110. Section 143 of the Localism Act states that any financial contribution received in terms of community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure that supports growth in Southwark.
- 111. In this instance the contribution required under the Mayoral CIL is £284,903, and an additional £603,677 plus indexation would need to be secured through the s106 agreement under the Crossrail SPD. No Southwark CIL is due as the rate is nil for zone 2 offices.

## Conclusion on planning issues

- 112. The redevelopment of the site is supported and welcomed in principle. The increased commercial space will generate up to 800 jobs on the site, and the building is designed to be attractive for either a single let, or multiple lets to smaller companies who want to locate in Bankside. As such, the application accords with policies to protect and increase employment space, and would reinforce the role of Bankside as an employment hub.
- 113. The proposal would be of a high quality design and of an appropriate height and massing. It would preserve the setting of the adjoining Kings Bench Conservation Area and the listed buildings of Ripley House and Chadwick House.



- 114. The impacts of the scheme in relation to daylight and sunlight are, on balance, considered acceptable. The extant permission, which remains capable of implementation, is a material consideration in the determination of this current application. That permission resulted in the loss of daylight, and to a lesser degree sunlight, to nearby residential properties, most notably at Ripley House, Chadwick House and Waterloo Mansions. The applicant has made changes to the scheme to reduce the extent to which the impacts are worsened, and the impacts are now only marginally worse that the extant scheme. Given the form of the building, the extent of further changes needed to materially reduce the impacts would be significant. On balance, therefore, it is concluded that the impacts on daylight and sunlight to adjoining properties is acceptable.
- 115. It is therefore recommended that permission be granted, subject to conditions as set out in the attached draft decision notice and the completion of a s106 legal agreement on terms as set out above.

## **Community impact statement**

- 116. In line with the council's community impact statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.
  - a) The impact on local people is set out above.

## Consultations

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

## Consultation replies

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

## Summary of neighbour consultation responses

- 119. 5 objections have been received on the following grounds.
- 120. Objection: Loss of daylight and sunlight to Ripley House.

Response: A daylight and sunlight report has been submitted which states that there would be losses to Ripley House. Changes have been made to the building in order to mitigate these impacts. Whilst the impacts relative to the existing situation would be noticeable in the case of several rooms, the degree of change above the consented scheme is more limited and this is a relevant issue in the overall assessment. It is noted that the primary habitable rooms for Ripley House face away from the street, into their shared courtyard. An assessment of these losses can be found in the main body of the report.

121. Objection: The proposal will spoil the beauty of the conservation area.

<u>Response:</u> The proposal is considered to be an appropriate and acceptable response to the adjacent conservation area and is substantially similar to the mixed use building previously permitted.

122. <u>Objection:</u> The building height is excessive; it should be no more than three to four storeys.

Response: The front elevation of the building responds to the prevailing building height in the street with four storeys up to the parapet line and additional set back floors The 6 storey building permitted in 2016 is a material consideration, and the increase in height is not so significant as to be harmful to the streetscene. The neighbouring building at 24-28 Rushworth Street has been permitted (but not yet implemented) at a height of up to 8 storeys.

123. <u>Objection:</u> Object to the use as commercial only. Should include residential accommodation as well.

<u>Response</u>: The proposal provides full replacement plus an uplift on the existing commercial floorspace which is supported by planning policies. Whilst the delivery of housing is a key objective of the council, flats are being brought forward in developments across Bankside and the need for flats must be balanced with the need for high quality commercial space.

124. Objection: No. 10 Rushworth Street have glazed balconies to both elevations. If the proposed development projects forward of the existing building lines, these balconies will suffer not only obstruction of outlook but also loss of light. Thus, loss of view (amenity) would be aggravated by overshadowing. The application should be refused for this reason.

Response: The four adjoining terraces belonging to the 10-13 Rushworth Street development have also been considered for sun on ground, to consider the impact of any shadow cast by the development. The analysis shows that the balconies would retain in excess of 50% of their area receiving 2 hours of sun on 21 March. This would be in accordance with the recommendations of the BRE and accordingly considered acceptable. At the rear, the proposed building is taller than the permitted, but the building line is set further back so the view from the terraces improves at its outer edge.

125. <u>Objection:</u> Lights should be switched off when the building is not in use and the use of any machinery should be silent.

<u>Response</u>: It is recommended a condition be attached to ensure noise from machinery would not be harmful to residential amenities.

126. <u>Objection</u>: The proposal should incorporate planting and it should be adequately maintained.

<u>Response</u>: Green roof planting is proposed and the green roof condition will require ongoing maintenance.

Summary of consultee responses

Conservation Area Advisory Group

127. CAAG commend the scheme and think it is interesting, is the right scale and has nice articulation. They do not like the top storey and the slit windows and consider that the top storey should be lighter.

## Transport for London

128. The cycle parking provision should be in line with London Plan Policy 6.13 and Table 6.2. The design should accord with TfL Cycle Design Standards and provision should be made not only for residents and office employees, but also visitors to the building. Therefore we request details of the on-street provision required for this building. This application does not impact the Transport for London Road Network (TLRN) or other TfL assets. TfL supports Southwark's requirement for the applicant to provide a Travel Plan and Construction and Logistics Plan.

## Designing out crime

129. The scheme should be able to achieve the security requirements of Secured by Design which would help to reduce the opportunity for crime, creating a safer, more secure and sustainable environment.

#### Historic England

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

## **Human rights implications**

- 131. 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.
- 132. This application has the legitimate aim of providing a new six storey office building. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

#### BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1445-33	Chief Executive's	Planning enquiries telephone:
	Department	020 7525 5403
Application file: 17/AP/1959	160 Tooley Street	Planning enquiries email:
	London	planning.enquiries@southwark.gov.uk
Southwark Local Development	SE1 2QH	Case officer telephone:
Framework and Development		020 7525 5513
Plan Documents		Council website:
		www.southwark.gov.uk

# **APPENDICES**

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation

# **AUDIT TRAIL**

Lead Officer	Simon Bevan, Director of Planning		
Report Author	Kiran Chauhan, Team Leader		
Version	Final		
Dated	25 October 2017		
<b>Key Decision</b>	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title		Comments Sought	Comments included
Strategic Director of Finance & Governance		No	No
Strategic Director, Environment and Social Regeneration		No	No
Strategic Director of Housing and Modernisation		No	No
Director of Regeneration		No	No
Date final report sent to Constitutional Team			27 October 2017

## **APPENDIX 1**

#### Consultation undertaken

**Site notice date:** 07/07/2017

Press notice date: 22/06/2017

Case officer site visit date: n/a

Neighbour consultation letters sent: 20/06/2017

## 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

Waste Management

## Statutory and non-statutory organisations consulted:

EDF Energy

**Environment Agency** 

Historic England

London Fire & Emergency Planning Authority

London Underground Limited

Metropolitan Police Service (Designing out Crime)

Natural England - London Region & South East Region

Network Rail (Planning)

Thames Water - Development Planning

Transport for London (referable & non-referable app notifications and pre-apps)

## Neighbour and local groups consulted:

Flat 5 59 Webber Street SE1 0RD Flat 4 59 Webber Street SE1 0RD Flat 7 59 Webber Street SE1 0RD Flat 6 59 Webber Street SE1 0RD Flat 3 59 Webber Street SE1 0RD 35-37 Rushworth Street London SE1 0RB Unit 7 33 Rushworth Street SE1 0RB Flat 2 59 Webber Street SE1 0RD Flat 159 Webber Street SE1 0RD Flat 12b 59 Webber Street SE1 0RD Flat 12a 59 Webber Street SE1 0RD Flat 16 59 Webber Street SE1 0RD Flat 15 59 Webber Street SE1 0RD	Flat 15 Sharpley Court SE1 0BJ Flat 18 Sharpley Court SE1 0BJ Flat 17 Sharpley Court SE1 0BJ Flat 14 Sharpley Court SE1 0BJ Flat 11 Sharpley Court SE1 0BJ Flat 10 Sharpley Court SE1 0BJ Flat 13 Sharpley Court SE1 0BJ Flat 12 Sharpley Court SE1 0BJ Flat 25 Sharpley Court SE1 0BJ Flat 24 Sharpley Court SE1 0BJ Flat 27 Sharpley Court SE1 0BJ Flat 26 Sharpley Court SE1 0BJ Flat 23 Sharpley Court SE1 0BJ Flat 23 Sharpley Court SE1 0BJ Flat 20 Sharpley Court SE1 0BJ Flat 20 Sharpley Court SE1 0BJ
Flat 9 59 Webber Street SE1 0RD Flat 8 59 Webber Street SE1 0RD	Flat 19 Sharpley Court SE1 0BJ Flat 22 Sharpley Court SE1 0BJ

Flat 11 59 Webber Street SE1 0RD Flat 10 59 Webber Street SE1 0RD Unit 11 33 Rushworth Street SE1 0RB Flat 3 Ripley House SE1 0RA Flat 2 Ripley House SE1 0RA Flat 5 Ripley House SE1 0RA Flat 4 Ripley House SE1 0RA Flat 12 Ripley House SE1 0RA Flat 1 Ripley House SE1 0RA Flat 9 Merrow House SE1 0QZ Flat 11 Ripley House SE1 0RA Flat 10 Ripley House SE1 0RA Unit 12 33 Rushworth Street SE1 0RB Unit 9 33 Rushworth Street SE1 0RB Unit 17 33 Rushworth Street SE1 0RB 1-3 Kings Bench Street London SE1 0QX Friars Primary School Webber Street SE1 0RF Flat 7 Ripley House SE1 0RA Flat 6 Ripley House SE1 0RA Flat 9 Ripley House SE1 0RA Flat 8 Ripley House SE1 0RA

Flat 17 59 Webber Street SE1 0RD Third Floor 24-28 Rushworth Street SE1 0RB Second Floor 24-28 Rushworth Street SE1 0RB

Ground Floor 61 Webber Street SE1 0RF 37 Rushworth Street London SE1 0RB First Floor 24-28 Rushworth Street SE1 0RB The Convent 48 Rushworth Street SE1 0RB 59a Webber Street London SE1 0RF Ground Floor 24-28 Rushworth Street SE1 0RB Manna House 8-20 Pocock Street SE1 0BW 20 Pocock Street London SE1 0BW Second Floor 61 Webber Street SE1 0RF First Floor 61 Webber Street SE1 0RF 18 Pocock Street London SE1 0BW Rushworth And Friars Primary School Webber Street SE1 0RF

33 Rushworth Street London SE1 0RB

50 Rushworth Street London SE1 0RB

St Alphege Church Kings Bench Street SE1 0QX

21 Rushworth Street London SE1 0RB 15-16 Rushworth Street London SE1 0RB Flat 22 59 Webber Street SE1 0RD Flat 19 59 Webber Street SE1 0RD Flat 18 59 Webber Street SE1 0RD Flat 21 59 Webber Street SE1 0RD Flat 20 59 Webber Street SE1 0RD 14 Rushworth Street London SE1 0RB Unit 23 33 Rushworth Street SE1 0RB 20 Rushworth Street London SE1 0RB Unit 21 33 Rushworth Street SE1 0RB

Unit 8 33 Rushworth Street SE1 0RB Unit 15 33 Rushworth Street SE1 0RB Unit 14 33 Rushworth Street SE1 0RB 17 Rushworth Street London SE1 0RB Unit 16 33 Rushworth Street SE1 0RB

Flat 8 Merrow House SE1 0QZ Flat 16 Sharpley Court SE1 0BJ

Re-consultation: n/a

Flat 21 Sharpley Court SE1 0BJ Flat 9 Sharpley Court SE1 0BJ Unit 22 33 Rushworth Street SE1 0RB Unit 20 33 Rushworth Street SE1 0RB Flat 14 59 Webber Street SE1 0RD Unit 24 33 Rushworth Street SE1 0RB Unit 19 33 Rushworth Street SE1 0RB 7b Kings Bench Street London SE1 0QX 7a Kings Bench Street London SE1 0QX Unit 13 33 Rushworth Street SE1 0RB Unit 10 33 Rushworth Street SE1 0RB Flat 6 Sharpley Court SE1 0BJ Flat 5 Sharpley Court SE1 0BJ Flat 8 Sharpley Court SE1 0BJ Flat 7 Sharpley Court SE1 0BJ Flat 4 Sharpley Court SE1 0BJ Flat 1 Sharpley Court SE1 0BJ Flat 3 Sharpley Court SE1 0BJ Flat 2 Sharpley Court SE1 0BJ Flat 28 Sharpley Court SE1 0BJ

Excluding Part Ground And Part First Floor 1 Rushworth

Street SE1 0RB

Flat 1 Merrow House SE1 0QZ

5 Kings Bench Street London SE1 0QX

Part Ground And Part First Floor 1 Rushworth Street SE1

Apartment 8 10 Rushworth Street SE1 0RB Apartment 7 10 Rushworth Street SE1 0RB 9 Rushworth Street London SE1 0RB Apartment 9 10 Rushworth Street SE1 0RB

Flat 5 Merrow House SE1 0QZ Flat 4 Merrow House SE1 0QZ Flat 7 Merrow House SE1 0QZ Flat 6 Merrow House SE1 0QZ Flat 3 Merrow House SE1 0QZ Flat 11 Merrow House SE1 0QZ Flat 10 Merrow House SE1 0QZ Flat 2 Merrow House SE1 0QZ Flat 12 Merrow House SE1 0QZ

Apartment 6 10 Rushworth Street SE1 0RB

Flat 35 Sharpley Court SE1 0BJ Flat 34 Sharpley Court SE1 0BJ Flat 36 Sharpley Court SE1 0BJ Flat 33 Sharpley Court SE1 0BJ Flat 30 Sharpley Court SE1 0BJ Flat 29 Sharpley Court SE1 0BJ Flat 32 Sharpley Court SE1 0BJ Flat 31 Sharpley Court SE1 0BJ

Apartment 3 10 Rushworth Street SE1 0RB Apartment 2 10 Rushworth Street SE1 0RB Apartment 5 10 Rushworth Street SE1 0RB Apartment 4 10 Rushworth Street SE1 0RB Apartment 1 10 Rushworth Street SE1 0RB 18-19 Rushworth Street London SE1 0RB Church Hall St Alphege Church SE1 0QX 12 Rushworth Street London SE1 0RB 8 Ripley House Rushworth Street SE1 0RA 20 Waterloo Mansions 59 Webber Street SE1 0RD 5 Waterloo Mansions 59 Webber Street SE1 0RD

# **APPENDIX 2**

## **Consultation responses received**

## Internal services

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

# **Statutory and non-statutory organisations**

Environment Agency London Underground Limited Metropolitan Police Service (Designing out Crime) Natural England - London Region & South East Region

# **Neighbours and local groups**

Apartment 5 10 Rushworth Street SE1 0RB Flat 16 59 Webber Street SE1 0RD 20 Waterloo Mansions 59 Webber Street SE1 0RD 5 Waterloo Mansions 59 Webber Street SE1 0RD 8 Ripley House Rushworth Street SE1 0RA