

Item No. 7.1	Classification: Open	Date: 21 March 2018	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 17/AP/4042 for: Full Planning Application Address: FORMER LESOCO CAMPUS, UFFORD STREET, LONDON SE1 8LE Proposal: Construction of a 274 room hotel in a building of up to seven storeys in height incorporating a restaurant at ground floor level (Class C1/A3) together with one further storey of hotel accommodation at basement level and rooftop plant. The development will include the creation of a new public realm, including a pedestrian route from The Cut to Ufford Street, with hard and soft landscaping and other associated works.		
Ward(s) or groups affected:	Cathedrals		
From:	Director of Planning		
Application Start Date 17/10/2017		Application Expiry Date 16/01/2018	
Earliest Decision Date 10/02/2018		PPA Date 18/12/2017	

RECOMMENDATION

1. a) That planning permission be granted, subject to conditions and the applicant entering into a satisfactory legal agreement, and;
- b) That in the event that the legal agreement is not entered into by 28 May 2018 the director of planning be authorised to refuse planning permission if appropriate for the reasons set out in paragraph 183 of this report.

BACKGROUND INFORMATION

Site location and description

2. The application site is a 0.4 hectare plot of land located to the south and west of LeSoCo Further Education College, and fronting Ufford Street. It was formerly part of the college campus and retains a short frontage onto The Cut to the north as well as a return frontage onto Burrows Mews to the east. Although the site is presently vacant, up until relatively recently it contained two buildings ancillary to the further education college.



Figure 1: Site Location Plan

3. Apart from the further education college, neighbouring uses are a mixture of retail, commercial and residential. These surrounding buildings vary in height. Immediately to the north, the substantial new college building stands seven storeys tall at its highest point. To the east, the Burrows Mews properties are between two and four storeys, while the Blackfriars Road buildings immediately behind rise to up to five-and-a-half storeys. To the south, on Ufford Street, there are existing low rise cottages and a vacant plot of land where permission has been granted for a building which would step-up from six storeys to seven directly opposite the site. Three-, four- and five-storeyed properties enclose the site along its northwestern boundaries. This range of building heights reflects the changing nature of the site context.
4. The site is subject to the following designations:
 - Bankside, Borough and London Bridge Opportunity Area
 - Bankside and Borough District Town Centre
 - Central Activity Zone
 - Air Quality Management Area
 - Area covered by Blackfriars Road SPD
5. Southwark underground station and Waterloo East rail station are within 100 metres walking distance, and Waterloo main station is within 500 metres. The site is also well situated for regular bus services along Blackfriars Road and Waterloo Road. This results in an excellent PTAL rating of 6b.
6. The nearest A Roads are Blackfriars Road (part of the TLRN) and Waterloo Road. The Cut is a Classified B Road, while Ufford Street and Burrows Mews are Classified C Roads. The wider surrounding area is located within a Controlled Parking Zone.
7. The site is not within a conservation area but the Mitre Road and Ufford Street Conservation Area, which is located within Lambeth, partly faces the site to the south and encompasses the residential terraces along Ufford Street. Located further to the south is the Valentine Place Conservation Area (which, at its closest point is approximately 40 metres away), from which views towards the site along Boundary Row can be gained.
8. There are no listed buildings on the site but there are Grade II listed buildings nearby on

Blackfriars Road, as follows:

- no. 74 Blackfriars Road (Grade II)
- nos. 75-78 Blackfriars Road, and attached railings (Grade II)
- nos. 81, 82 and 83 Blackfriars Road, and attached railings (Grade II)
- nos. 85 and 86, including railings (Grade II)
- Former Sons of Temperance Friendly Society, no. 176 Blackfriars Road (Grade II).

9. The site is not subject to any tree preservation orders.
10. The borough boundary with Lambeth lies approximately 15 metres to the west of the site.

Details of proposal

11. Full planning permission is sought for the construction of a hotel incorporating a restaurant with ancillary bar (C1/A3 use class), to be arranged as two blocks linked by a 'bridge' element. The block to be located in the eastern part of the site (Block B) would comprise seven storeys together with rooftop plant and one additional storey of accommodation at basement level. The maximum height of the block would be 23.20 metres above ground level. The block to be located in the western part of the site (Block A) would comprise five storeys together with plant and one additional storey of accommodation at basement level. At its maximum height, this block would be 15.50 metres above ground level.
12. The hotel would contain 274 en-suite rooms to be distributed across all floors including the basement. The restaurant and bar would be located at ground floor level, as would the hotel reception. Staff facilities, visitor conveniences and other storage areas ancillary to both the hotel and restaurant bar would be largely located at ground and basement levels.
13. The development would provide the following floorspace schedule:

Use	Proposed GIA (square metres)
Restaurant (A3 Use Class)	336
Hotel (C1 Use Class)	8805
Total	9141

14. The building would be faced predominantly in London stock brick, broken up in different places by textural brickwork and some 'feature' green brickwork. The upper storeys of the building would be finished in white brick and the rooftop plant would be enclosed in brass-effect perforated cladding. Doors and windows would be either frameless or have brass-effect frames. The 'bridge' linking the two blocks would be largely finished in frameless glazing with structural elements faced in brass-effect cladding.



Figure 2: View eastwards along Ufford Street, showing Block A of the hotel in the foreground and Block B behind.

15. The application proposes a new pedestrian route connecting The Cut with Ufford Street, off which would branch a shared public/vehicular yard linking the centre of the site to Burrows Mews. The proposed restaurant and bar would front onto the western side of the pedestrian route with a short return frontage onto Ufford Street. The hotel reception area would front onto the pedestrian route close to the point at which it meets Ufford Street. The proposals also include a landscaped public amenity space containing seating and sculptures, to be located adjacent to the restaurant and close to the site's entrance on The Cut.



Figure 3: View from The Cut, looking southwestwards through the proposed New Marlborough Yard towards Block A of the hotel and the 'bridge' link.

16. Servicing would take place within the proposed shared public/vehicular yard, entry to and exit from which would be via Burrows Mews. The majority of servicing vehicles would approach the site from Short Street and the Cut.
17. Where visitors arrive by taxi or coach, drop-off on The Cut and Blackfriars Road would be encouraged respectively. On-site cycle parking facilities would be provided for guests and employees of both the hotel and restaurant/bar. The development does not propose any on-site car parking.

Relevant planning history of the application site

18. In 2014, outline planning permission was granted for the demolition of the existing college buildings on this site as part of the consolidation of the LeSoCo campus on the plot of land fronting The Cut. This outline permission established the acceptability in principle of releasing the application site from education use. A full planning permission for the redevelopment of the site for a residential-led scheme was approved in 2016, but

the permission has not been implemented and the site remains vacant.

19. A full detailed history of all relevant planning applications at this site follows below:

<p>Application reference number: 13/EQ/0171 Application type: Pre-Application Enquiry (ENQ)</p> <p><i>Demolition and redevelopment of part college campus for approximately up to 55 residential units B1 floorspace, space substations creating up to 10,400 sqm of D1 floorspace (4,500 sqm of additional floorspace), a sports roof, public footway and related ancillary works.</i></p> <p>Decision date: 28/01/2015 Decision: Pre-application enquiry closed (EQC)</p>
<p>Application reference number: 13/AP/3534 Application type: Screening Opinion (EIA) (SCR)</p> <p><i>Request for a Screening Opinion to determine whether an Environmental Impact Assessment is required for the following development: Redevelopment of the Waterloo Campus site for new educational buildings accessed from The Cut and for up to 54 new residential units accessed from Ufford Street.</i></p> <p>Decision date: 20/12/2013 Decision: Screening Opinion - EIA Regs (SCR)</p>
<p>Application reference number: 13/AP/4094 Application type: Outline Planning Permission (OUT)</p> <p><i>Outline application for: The demolition of existing college buildings and redevelopment of the site to provide up to 44 residential units in two blocks of two to four, and three to six storeys, up to 35sqms of B1/D1 floorspace, new street linking The Cut and Ufford Street, amenity space, landscaping and associated ancillary works.</i></p> <p>Decision date: 25/03/2014 Decision: Granted with Legal Agreement (GWLA)</p>
<p>Application reference number: 14/EQ/0228 Application type: Pre-Application Enquiry (ENQ)</p> <p><i>Demolition of existing college buildings and redevelopment of site to provide 67 residential units in two blocks of one to five and three to seven storeys including basement which includes a new street linking The Cut and Ufford Street amenity space, Landscaping and associated ancillary works.</i></p> <p>Decision date: 11/05/2015 Decision: Pre-application enquiry closed (EQC)</p>
<p>Application reference number: 15/AP/3024 Application type: Full Planning Permission (FUL)</p> <p><i>Demolition of existing college buildings and redevelopment of the site to provide 60 residential units (1 studio, 18x1 bed, 29x2 bed, 8x3 bed and 4x4 bed) in two blocks - being a part single to part five (plus basement) storey block, and a part four to part seven storey block; 852sqm of B1/A1/A2/D1 floorspace and a new street linking The Cut to Ufford Street, together with associated amenity space, landscaping and ancillary works.</i></p>

<p>Decision date: 25/03/2016 Decision: Granted with Legal Agreement (GWLA)</p>
<p>Application reference number: 17/EQ/0059 Application type: Pre-Application Enquiry (ENQ)</p> <p><i>Proposed redevelopment of former college to create a 273 bedroom hotel arranged over basement, ground and five upper floors, with associated commercial uses at ground floor level; proposed creation of a public route through the site and landscaping improvements.</i></p> <p>Decision date: 23/08/2017 Decision: Pre-application enquiry closed (EQC)</p>
<p>Application reference no.: 17/EQ/0239 Application type: Pre-Application Enquiry (ENQ)</p> <p><i>Proposed redevelopment of a former Lewisham and Southwark College to provide a hotel within two linked buildings with associated commercial use (Class A3). Proposed creation of a public route, landscaping improvements.</i></p> <p>Decision date 13/10/2017 Decision: Pre-application enquiry closed (EQC)</p>
<p>Application reference number: 17/AP/3407 Application type: Prior Approval (PRAP)</p> <p><i>The demolition of the unused former college building</i></p> <p>Decision date: 26/09/2017 Decision: Prior Approval not required (PANR)</p>

Relevant planning history of adjoining and nearby sites

20. The following relevant planning history exists for adjoining and nearby sites:

<p><u>88-89 Blackfriars Road, SE1 (includes land fronting Ufford Street and Burrows Mews)</u></p> <p>Application reference no.: 11/AP/4138 Application type: Full Planning Permission (FUL)</p> <p><i>Rear extension at second to fourth floor level together with infill at first floor level, balconies and projecting glass bays to the Ufford Street elevation, and part change of use of B1 office space to provide 7 residential units (4no. one bed, 1no. two bed, 2no. three bed); small corner extension at the front of the unit to provide additional retail (A1) and office (B1) floorspace; and installation of 4no. air conditioning units.</i></p> <p>Decision date: 20/03/2012 Decision: Granted with Unilateral Undertaking (GWUU)</p> <p>N.B. A minor material amendment was made to this consent in 2016 to make minor elevational changes and reposition the approved roof plant (ref: 16/AP/0875)</p>
<p><u>90-92 Blackfriars Road, SE1 (includes land fronting Ufford Street)</u></p> <p>Application reference no.: 12/AP/3558</p>

Application type: Full Planning Permission (FUL)

Demolition of existing buildings and erection of a replacement building of five to eight storeys in height (max height of 27.5m), plus basement, comprising 53 residential units, 633 sqms of retail floorspace (Use Class A1) and 767sqms of office floorspace (Use Class B1), disabled parking spaces and roof top landscaped amenity areas.

Decision date: 04/06/2013

Decision: **Granted with Legal Agreement (GWLA)**

LeSoCo, The Cut, SE1

Application reference no.: 13/AP/4093

Application type: Full Planning Permission (FUL)

Demolition of existing college buildings and the redevelopment of site to provide new college buildings of between two and six storeys in height (7779sqms of new floorspace), together with associated access and landscaping and ancillary facilities.

Decision date: 04/04/2014

Decision: **Granted (GRA)**

KEY ISSUES FOR CONSIDERATION

Summary of main issues

21. The main issues to be considered in respect of this application are:
- a) Principle of the proposed development in terms of land use and conformity with strategic policies;
 - b) Environmental impact assessment;
 - c) Design;
 - d) Impact on heritage assets;
 - e) Accessibility for wheelchair users;
 - f) Impact of adjoining and nearby uses on occupiers and users of proposed development;
 - g) Impact on the amenity (excluding daylight, sunlight and overshadowing) of adjoining occupiers;
 - h) Daylight impacts;
 - i) Sunlight impacts;
 - j) Overshadowing;
 - k) Amenity impacts arising from the construction process;
 - l) Transport and highway matters;
 - m) Flood risk and sustainable urban drainage;
 - n) Trees, landscaping, public realm and biodiversity;
 - o) Environmental matters;
 - p) Sustainability;
 - q) Community engagement;
 - r) Planning obligations;
 - s) Consultation responses: Members of the public, and;
 - t) Consultation responses: Statutory consultees.

Planning policy

National Planning Policy Framework (the Framework)

22.

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 11: Conserving and enhancing the natural environment
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 2.12 - Central Activities Zone - predominantly local activities
Policy 2.13 - Opportunity Areas and Intensification Areas
Policy 4.1 - Developing London's economy
Policy 4.5 - London's visitor infrastructure
Policy 4.7 - Retail and town centre development
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 5.17 - Waste Capacity
Policy 5.18 - Construction, excavation and demolition waste
Policy 5.21 - Contaminated land
Policy 6.1 - Strategic approach (Transport)
Policy 6.3 - Assessing effects of development on transport capacity
Policy 6.5 - Funding Crossrail and other strategically important infrastructure
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 7.8 - Heritage assets and archaeology
Policy 7.14 - Improving air quality
Policy 7.15 - Reducing noise and enhancing soundscapes
Policy 7.18 - Protecting local natural space and addressing local deficiency
Policy 7.19 - Biodiversity and access to nature
Policy 7.21 - Trees and woodland

Policy 8.2 - Planning obligations
Policy 8.3 - Community infrastructure levy

Regional Supplementary Planning Documents/Guidance

24.

Mayor of London: Accessible London: Achieving an Inclusive Environment (SPG, 2004)
Mayor of London: Sustainable Design and Construction (SPG, 2014)
Mayor of London: Shaping Neighbourhoods - Character and Context (SPG, 2014)
Mayor of London: Planning for Equality & Diversity in London (SPG, 2007)
Mayor of London: Transport Strategy (2010)
Mayor of London: Climate Change Mitigation and Energy Strategy (2010)
Mayor of London: Climate Change Adaptation Strategy (2011)
Mayor of London: Securing London's Water Future - Water Strategy (2011)
Mayor of London: Energy Strategy (2010)
Mayor of London: Economic Development Strategy (2010)
Mayor of London: Use of planning obligations and MCIL in funding Crossrail (2016)

Core Strategy 2011

25.

Strategic Targets Policy 1 - Achieving growth
Strategic Targets Policy 2 - Improving places
Strategic Policy 1 - Sustainable development
Strategic Policy 2 - Sustainable transport
Strategic Policy 3 - Shopping, leisure and entertainment
Strategic Policy 10 - Jobs and businesses
Strategic Policy 11 - Open spaces and wildlife
Strategic Policy 12 - Design and conservation
Strategic Policy 13 - High environmental standards
Strategic Policy 14 - Implementation and Delivery

Southwark Plan 2007 (July) - saved policies

26. 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.

Policy 1.1 - Access to employment opportunities
Policy 1.7 - Development within town and local centres
Policy 1.12 - Hotels and other visitor accommodation
Policy 2.3 - Enhancement of education establishments
Policy 2.5 - Planning obligations
Policy 3.1 - Environmental effects
Policy 3.2 - Protection of amenity
Policy 3.3 - Sustainability assessment
Policy 3.4 - Energy efficiency
Policy 3.6 - Air quality
Policy 3.7 - Waste reduction
Policy 3.9 - Water
Policy 3.11 - Efficient use of land
Policy 3.12 - Quality in design
Policy 3.13 - Urban design
Policy 3.14 - Designing out crime

Policy 3.18 - Setting of listed buildings, conservation areas and world heritage sites
Policy 3.19 - Archaeology
Policy 3.28 - Biodiversity
Policy 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

Southwark Supplementary Planning Documents (SPDs)

27. Sustainability Assessment (SPD, 2009)
Design and Access Statements (SPD, 2007)
Section 106 Planning Obligations / Community Infrastructure Levy (SPD, 2015)
Sustainability Assessment (SPD, 2009)
Sustainable Transport (SPD, 2010)
Sustainable Design and Construction (SPD, 2009)
Blackfriars Road (SPD, 2014)
2015 Technical Update to the Residential Design Standards (SPD, 2011)

Principle of development

Policy context

28. The application site is located within the Central Activities Zone (CAZ), Bankside, Borough and London Bridge Opportunity Area and Borough and Bankside District Town Centre. The site also falls within the area covered by the Blackfriars Road SPD.
29. The London Plan considers Opportunity Areas to be “the capital’s major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other developments linked to existing or potential improvements to public transport”. Within Opportunity Areas, Policy 2.13 (Opportunity Areas and Intensification) seeks to optimise residential and non-residential output and densities, provide social and other infrastructure to sustain growth, and where appropriate contain a mix of uses. Development proposals should contribute towards meeting the indicative estimates for employment capacity including supporting wider regeneration and integration of developments to the surrounding area. Policy 4.5 (London’s Visitor Infrastructure) expects strategically important hotel provision to be located in opportunity areas.
30. Table A1.1 (Annex 1) of the London Plan provides an indicative employment capacity of 25,000 new jobs to be delivered over the plan period to 2031 within the Bankside, Borough and London Bridge Opportunity Area.
31. Southwark’s Core Strategy reinforces the London Plan aspirations for development in the CAZ to support London as a world class city. The CAZ and Opportunity Areas are targeted as growth areas in the borough where development will be prioritised. The council will allow more intense development for a mix of uses in the growth areas and make sure development makes the most of a site’s potential and protects open space (Strategic Policy 1). Core Strategy Strategic Targets Policy 2 reflects the above London Plan targets for the opportunity areas.

Loss of education use

32. The lawful use of the application site is Class D1, owing to it most recently having formed part of the LeSoCo further education college campus. In 2014, permission was granted for the existing college buildings to be demolished and for modern education facilities to be provided within a single extended and refurbished building on the

northern part of the site, fronting The Cut. The higher density nature of these new facilities, which fully replaced the space lost of the application site, meant there was no conflict with Saved Policy 2.3 (Enhancement of educational establishments) of the Southwark Plan, which seeks to protect D class educational establishments. This, enabled the release of the remaining (southern) portion of the site for an alternative use. Granted concurrently with the full permission for the new college facilities was outline permission for up the construction of up to 44 residential units on the southern portion of the site. No reserved matters applications were thereafter submitted and the original permission has since lapsed. However a subsequent permission was granted in 2016 for residential use of the site, which again confirmed that there was no requirement to replace education floorspace on this site.

33. Given that there have been no material changes either to relevant policy or the character of the site in the interim, it stands that the change of the lawful D class use of the site presents no conflict with Saved Policy 2.3 (Enhancement of educational establishments) of the Southwark Plan.

Consented residential use of the site

34. As discussed above, planning permission was granted in 2016 for the redevelopment of the application site primarily for residential use. The permission is extant but the development has not been implemented. When assessing the acceptability of the current application, the existence of a permission for residential use would not in itself preclude permission being granted for any alternative use. It is noted that a number of representations have stressed the need for housing in the area, and a preference for the residential scheme. However, if it is concluded that a hotel use is in itself acceptable in policy terms, then the existence of a residential permission would not be a justifiable reason for not granting permission for the hotel scheme.

Hotel

35. Saved Policy 1.12 (Hotels and other visitor accommodation) of the Southwark Plan states that hotels will be encouraged in areas with high public transport accessibility, but that they will not be permitted where they would result in an over dominance of visitor accommodation in the locality. Strategic Policy 10 (Jobs and businesses) of the Core Strategy advises that hotels would be allowed in town centres, strategic cultural areas and places with good accessibility to public transport, provided no harm would be caused to local character.
36. Policy 4.5 (London's Visitor Infrastructure) of the London Plan aims to provide a net increase of 40,000 hotel bedrooms by 2031 and advises boroughs to focus strategically important new visitor provision within opportunity areas and within the Central Activities Zone (CAZ). The application site is located within both the CAZ and the Bankside, Borough and London Bridge Opportunity Area. It has a public transport accessibility level of 6b (the best possible accessibility level) and is within walking distance of Southwark, Blackfriars and Waterloo stations. Blackfriars Station provides a direct route to Gatwick Airport and several bus routes serve Blackfriars Road. The location, therefore, meets the requirement for high public transport accessibility.
37. Notwithstanding that a hotel on this site may be appropriately located, the requirement for the proposal to not result in an over dominance of visitor accommodation must be considered. There are a number of existing hotels which are located within close proximity of the application site and in the wider Bankside and Waterloo area. An over-concentration of hotels can detract from the vitality of the place, reduce the opportunity for a range of other services to be provided, and increase the transient population in an area. This can manifest itself in harm to the character and successful functioning of an area and can undermine the stability of a community.

38. The Bankside area has seen a strong growth in hotels and, while this development helps meet a demand, it is important to balance this against the aims of fostering a stable community and providing space for offices and other important facilities.
39. Within 750 metres of the application site the following hotels either exist or are under construction:

Hotel name	No. of bedrooms
Within a 250 metre radius	
Hampton by Hilton, 157 Waterloo Road	297
Novotel Blackfriars, 46 Blackfriars Road	182
Ibis Blackfriars, 49 Blackfriars Road	297
Travelodge London Central Southwark, 202-206 Union Street	202
<u>TOTAL</u>	<u>978</u>
Within a 251-500 metre radius	
Travelodge London Central Waterloo, 195-203 Waterloo Road	279
Holiday Inn Express, 103-109 Southwark Street	88
Premier Inn Southwark Tate Modern, Great Suffolk Street	122
Hilton London Bankside, Great Suffolk Street	292
The Wellington Hotel, 81-83 Waterloo Road	25
The Mad Hatter Hotel, 3-7 Stamford Street	30
H10 London Waterloo, 284-302 Waterloo Road	177
Wedge House Hotel ^{***} , 32-40 Blackfriars Road	192 ^{***}
<u>TOTAL</u>	<u>1205</u>
Within a 501-750 metre radius	
Mercure London Bridge, Southwark Street	144
Citizen M London Bankside Hotel, 20 Lavington Street	192
Mondrian Hotel in Sea Containers House, 20 Upper Ground	359
Park Plaza Westminster Bridge, 200 Westminster Bridge Road	1021
Park Plaza County Hall, 1 Addington Street	398
Park Plaza London Waterloo, 6 Hercules Road	494
Marlin Waterloo, 111 Westminster Bridge Road	236

Point A Hotel, 118-120 Westminster Bridge Road	75
Premier Inn London Waterloo, 85 York Road	235
The Bridge Hotel, 30 Borough Road	30
Bankside Hotel***, 2 Blackfriars Road	161***
<u>TOTAL</u>	<u>3345</u>

***Indicates hotels which are under construction

40. There is also a planning application, the outcome of which is pending the applicant entering into a legal agreement and referral to the Mayor of London, which proposes to redevelop land at 18 Blackfriars Road for a scheme incorporating a 548-bedroom hotel. In the event that permission is granted and the scheme is implemented, this would bring the total number of hotel rooms within 750 metres of the application site to 6076.
41. The GLA's most recent working paper on future hotel demand, entitled *Understanding The Demand For And Supply Of Visitor Accommodation In London To 2036* (August 2013), indicates that by 2036 the number of additional hotel rooms required across London will be 42,900, of which 1,800 will be required in Southwark. Given the lengthy time frame, together with the number of hotels recently built and those that have consent, it is likely that this target will easily be reached. Despite this, the application site is considered to be well suited for hotel use given its excellent accessibility to public transport and close proximity to a number of major tourist attractions. The *Employment and Enterprise Background Paper* (2010) to the Core Strategy states that there are 58 visitor attractions in Southwark with the main destinations in the Bankside and London Bridge area; hence it would be reasonable to expect to see hotel accommodation provided in these parts of the borough. While there are a number of hotels in the locality, the surrounding land uses remain very mixed and include offices, residential, educational, cultural and retail. As such, there is not a dominance of hotels in this location to the point where it is preventing other uses from functioning successfully. Accordingly, and taking account of the weight of support London Plan Policy 4.5 (London's visitor infrastructure) gives to hotels in central London, the proposed hotel use is considered acceptable in principle. The issues relating to any potential impact on the amenity of neighbours is discussed later in this report.

Restaurant with ancillary bar

42. Saved Policy 1.7 of the Southwark Plan states that within town centre locations such as this, developments will be permitted providing a range of uses, including cultural, leisure and tourism. The policy requires uses such as the proposed restaurant to: be of a scale that is appropriate to the character and function of the town centre; not harm the vitality and viability of the centre; create active frontages, and; cause no harm to the amenity of nearby occupiers.
43. The restaurant (Class A3, with ancillary bar) would diversify and contribute to the mix of food and beverage options which can be found along The Cut. Offering 156 covers internally and further external seating in a landscaped public realm, the restaurant would be of an adequate size to serve the general public and hotel patrons without harming the viability of other nearby similar establishments.
44. The majority of the restaurant's frontage would be onto the proposed New Marlborough Yard which, owing to its location in the centre of the site, places it a good distance from

the nearest residential properties to the east, south and west. Although the restaurant would be in relatively close proximity to two residential properties to the north (nos. 33 and 35A The Cut), the pocket park would create a spatial buffer and fencing and planting are proposed to the boundary line to restrict overlooking. In the interests of protecting the amenity of all nearby occupiers, the hours of operation are limited to 07:00 to 00:00 Monday to Sunday, which is consistent with the opening times of other similar establishments in this location, and the outdoor dining space is to be vacated by 22:00 Monday to Sunday. As such, there is no risk of neighbouring occupiers experiencing significant additional noise or other forms of amenity disturbance as a result of the restaurant use.

45. In summary, the proposed restaurant with ancillary bar is in line with the objectives of Saved Policy 1.7 and is therefore welcomed.

Environmental impact assessment

46. The European SEA Directive is transposed into UK law by the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015. The Regulations set out the circumstances under which development needs to be underpinned by an Environmental Impact Assessment (EIA). Schedule 1 of the Regulations set out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development for which an EIA might be required on the basis that it could give rise to significant environmental impacts. Schedule 3 sets out that the significance of any impact should include consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.
47. The development is not considered to constitute EIA development, based on a review of the scheme against both the EIA Regulations and the European Commission guidance.
48. Consideration should, however, still be given to: the scale, location or nature of development; cumulative impacts, and; whether these or anything else are likely to give rise to significant environmental impacts. The proposed application is the redevelopment of a site for the purposes of a hotel and restaurant with ancillary bar. Its scale is appropriate to its urban setting and it is unlikely to give rise to any significant environmental impacts.

Design

Scale, bulk and site layout

49. In terms of bulk and scale as well as the attendant impact on townscape and street scene, the proposed development is very similar to the residential scheme previously approved for the site under 15/AP/3024. As with the previous scheme, two blocks are arranged around a central route on the historic line of New Marlborough Yard. The easternmost block (Block B) steps up towards the higher scale of buildings adjacent to Blackfriars Road, but is lower than the height of the LeSoCo building immediately to the north while the western block (Block A) steps down to the lower scale of buildings immediately behind. This is considered appropriate. The notable difference to the consented massing is the inclusion of a linking 'bridge' structure which unifies the two blocks into a more singular structure.
50. Due to incorporating a storey of accommodation at basement level, a number of lightwells are proposed of which those visible from the public realm would be on Ufford Street and 'East Mews'. All the lightwells are of an adequate size to ensure the basement-level hotel rooms are daylit to an acceptable level and benefit from a reasonable quality of outlook. Glazed balustrades of height 1.1 metres would provide

street-level enclosure to the lightwells. This choice of material would ensure the balustrades neither add to the apparent scale or bulk of the building nor detract from its overall design quality.

51. The publicly-accessible realm is logically arranged in relation to the surrounding buildings and existing pedestrian routes, and the re-establishment of New Marlborough Yard is a major benefit of the development.



Figure 4: Ground floor plan in context



Figure 5: Third floor plan in context

Architecture and detailed design

53. The form, height and materials of the proposed development are very similar to the consented residential scheme. The main differences are the linking block, and that the proposed development has a more repetitive façade that does not incorporate balconies.

54. The applicants have responded to the challenge of introducing visual interest while ensuring the building sits comfortably in the streetscene by producing an Ufford Street façade that features projecting bays up to the building’s five storey shoulder line. These are detailed with recessed brick panels separating the windows vertically while a decorative stoneband separates the ground and first floor levels. This alludes to the detailing on former warehouses in the vicinity, some of which are of a similar scale. A degree of further richness is added by a pattern of projecting bricks on the bays and by window and perforated metal panels set within each opening. The undulating plan form of the storeys above the shoulder line adds a degree of welcome complexity and contrast while lessening the building’s apparent bulk; these storeys also more or less follow the same set-back and wavy form as the consented scheme while also incorporating similar light-coloured brickwork.



Figure 6: The proposed Ufford Street elevation. The glazed ‘bridge’ links Block A (on the left) to Block B (on the right)

55. The building’s other façades are relatively restrained up to the shoulder height but with generous window openings complete with window and panel sets to add a degree of richness to the detailing. The vertical stack-bonded bands of brick between the floors are also welcome. The proportions of these façades are carefully considered and the treatment is particularly successful on Block A due to the lower height of the building.
56. With regard to the east elevation of Block B (which fronts onto Burrows Mews), this is relatively tall in the context of the adjacent mews properties. However, the elevation is not especially long and visual differentiation between the lower and upper storeys is offered by the use of dark brick below and white brick above the shoulder line, creating the effect of a ‘heavy base’ supporting a ‘lightweight top’. The use of brick is also sympathetic to the more traditional townscape character of Burrows Mews. For these reasons, the architectural quality of the Burrows Mews elevation is considered satisfactory.
57. The north elevation of Block B—which faces towards the LeSoCo building and fronts onto the proposed ‘East Mews’— is relatively plain. Despite careful landscaping, the scale and plainness of the building in combination with the restrained and equally tall LeSoCo building opposite will be such that East Mews will feel rather like a secondary space. However, given its lack of prominence in the overall townscape, its very short length as a connection between Burrows Mews and new Marlborough Yard, and the precedent of scale set by the consented scheme, the architectural resolution of this façade is regarded as acceptable.

58. The restaurant extends almost the entire ground floor length of the New Marlborough Yard façade of Block A, and the hotel reception forms a frontage to the part of Block B at the junction of New Marlborough Yard and Ufford Street. The more open glazed nature of these façades provides a welcome contrasting base to the building which will do much to animate the Yard and make it a successful place. The use of green glazed tiles on these parts of the elevations alludes to traditional pub fronts and will lend liveliness to the New Marlborough Yard and Ufford Street corners of the buildings.



Figure 7: Elevation of the east façade of Block A, which fronts onto the New Marlborough Yard.

59. A glazed bridge link is proposed between Blocks A and B across New Marlborough Yard from first level upwards to the full height of Block A. Although this will lessen the legibility of the through-route from Ufford Street to The Cut, the glazed link on all levels is critical to the successful functioning of the hotel. The link has also been set back from Ufford Street so that the entrance to the Yard remains readily perceptible to passers-by. Further mitigation can be achieved through careful detailing to ensure the construction is suitably lightweight and transparent; these details will be secured by condition.



Figure 8: View westwards along Ufford Street close to the junction with Burrows Mews. The proposal is shown in the context of the consented schemes at 88-89 Blackfriars Road (right) and 90-92 Blackfriars Road (left).

Secured by design

60. Saved Policy 3.14 'Designing out Crime' of the Southwark Plan requires development in

both the private and public realm to be designed to improve community safety and reduce the risk of crime.

61. The applicant engaged with the Metropolitan Police in pre-application discussions and made a number of changes at their recommendation before submitting the formal planning application. The Metropolitan Police has assessed the final proposal and considers that the development is suitable to achieve Secured by Design accreditation. A condition will, therefore, be attached to this end.

Impact on heritage assets

62. In considering the impact of a proposal on a heritage asset, the Local Planning Authority must have regard to planning legislation in its determination of a planning application. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that, when considering whether to grant planning permission for development which affects a heritage asset or its setting, the local planning authority shall have special regard to the desirability of preserving the asset or its setting, or any features of special architectural or historic interest which it possesses. In this context, "preserving", means doing no harm. The council's conservation policies echo the requirements of the National Planning Policy Framework (NPPF) and require all development to conserve or enhance the setting of heritage assets.
63. The NPPF states at paragraph 131 that in determining a planning application, the local planning authority should take account of:
 - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness
64. Paragraph 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Similarly Saved Policy 3.15 (Conservation of the historic environment) requires development to preserve or enhance the special interest or historic character or appearance of buildings and areas of historical or architectural significance, and this is repeated in Strategic Policy 12. Saved Policy 3.18 (Setting of listed buildings, conservation areas and world heritage sites) states that permission will not be granted for developments that would not preserve or enhance the setting of a listed building or a conservation area.

Impact on the setting of the nearby conservation areas

65. The Mitre Road and Ufford Street Conservation Area partly faces the site to the south and encompasses the residential terraces along Ufford Street. 40 metres to the south of the site is the Valentine Place Conservation Area, from which views towards the site along Boundary Row can be gained. The intrinsic character of both Conservation Areas derives from the relatively enclosed townscape as well as the mix of high-quality residential and warehouse buildings which in the majority are either late Victorian or Edwardian.
66. It is recognised that the scheme will form a relatively assertive backdrop to parts of both Conservation Areas, but this scale has been established by the extant permission. Additionally, and for the reasons expanded upon in the earlier 'Architecture' section of this Report, the articulation (whereby the upper floors are stepped back), the contextually-sympathetic palette of materials and the well-considered fenestration and

detailing of the elevations will ensure the building sits comfortably within the street and wider townscape. As such, it is considered that the setting of these two nearby conservation areas would be preserved.

Impact on the setting of the nearby listed buildings

67. The nearest listed buildings line the western side of Blackfriars Road and back on to Burrows Mews. Those which can be seen within the same context as the site are nos. 86, 85, 83 and 74 Blackfriars Road. All are Grade II listed. It is also possible to see the site within views of the Former Sons of Temperance Friendly Society building, which is a Grade II listed building on Blackfriars Road opposite the entrance to Ufford Street.
68. The proposed development is considered to be of a scale, height and massing respectful of these nearby listed buildings. Furthermore, the tightness of the streetscape is such that the entire bulk of the proposed building would not be perceptible from any single vantage point. Presenting strong frontages to Burrows Mews and Ufford Street, the building would reinforce the tight-knit of the local urban grain, while the proposed materials, features and detailing show respect to the traditional character of these neighbouring designated heritage assets. In summary, the proposal would preserve the setting of these nearby listed buildings.

Accessibility for wheelchair users

69. London Plan policy 4.5 seeks to ensure that at least 10% of bedrooms in new hotels are wheelchair accessible. As set out in the Mayor's *Shaping Neighbourhoods Accessible London* SPG (2014), the delivery of 5% fully accessible rooms and 5% adaptable rooms is acceptable.
70. The planning application includes a schedule showing that 13 of the rooms would be accessible and 14 rooms would be easily adaptable. This provision would meet the requirements of London Plan Policy 4.5 and is therefore acceptable.
71. A condition is to be imposed requiring the 13 accessible rooms to be fitted out from first occupation and retained as such for as long as the building is in use. The condition will also require that the hotel adopts a monitoring programme so that the remaining rooms can be fitted out to 'accessible' standards as demand requires.

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

72. The existing uses nearby include residential, commercial, educational and leisure. None of these uses would inhibit the successful functioning of the proposed hotel. Additionally, the proposal has been designed to ensure guests would be protected from undue overlooking, noise and other disturbance originating from adjoining premises.

Impact on the amenity (excluding daylight, sunlight and overshadowing) of adjoining occupiers

Overlooking

73. The Residential Design Standards SPD states that in order to prevent unnecessary problems of overlooking, development should achieve the following distances:
 - A minimum distance of 12 metres at the front of the building and any elevation that fronts onto a highway
 - A minimum distance of 21 metres at the rear of the building.

74. It should be noted, however, that these rules apply where the 'facing' buildings are both in residential use. A hotel is, despite providing an accommodation function, a commercial use. Therefore, while the separation distances are a useful guide, they can be applied with some degree of flexibility in this instance.
75. The proposed hotel would have highway-fronting elevations along its Ufford Street and Burrows Mews boundaries. The width of both highways is such that a separation distance of approximately 12 metres would be maintained with all adjacent properties. The requirements of the Residential Design Standards would, therefore, be met meaning these nearby dwellings would not experience any undue loss of privacy.
76. The southern wing of Block A would align with the windowless flank elevation of St Andrews Church and Vicarage. Thus, despite its proximity, the Vicarage would not be at risk of any overlooking.
77. The Theatre View apartments are located to the west of Block A. The rear elevation of the apartments sits directly on the site boundary, with flats on the first to fourth floors. It is important to note that there are no ground floor habitable room windows at the Theatre View apartments, meaning all affected windows are at first floor level or higher. Block A of the proposed hotel takes a U-shaped plan form, at the core of which terraced courtyard gardens (not accessible by hotel guests) are proposed. The separation distance across the courtyard would incrementally increase as follows:
- Ground floor of Theatre View to ground floor of hotel: 12.5 metres
 - First floor of Theatre View to first floor of hotel: 16.75 metres
 - Second floor of Theatre View to second floor of hotel: 16.75 metres
 - Third floor of Theatre View to third floor of hotel: 22.75 metres
78. At ground, first and second floors it is proposed to install angled etched glass privacy screens on the exterior of those hotel windows which face directly towards the Theatre View apartments to restrict outward views. The incorporation of these privacy screens would ensure no undue overlooking of the Theatre View apartments, thereby satisfactorily mitigating for the failure to achieve the 21 metre separation distance. It is also noted that the consented residential scheme included a communal garden at the rear of Block A, and residents using the garden would have had views up towards the Theatre View apartment balconies and windows. Whilst the separation distances set out in guidance refer to window-to-window overlooking, the absence of accessible space at the rear of the hotel block will remove any opportunity for overlooking directly at the rear of the Apartments.
79. The northwestern corner of the site is enclosed by nos. 21 and 25 Short Street and nos. 49-35 The Cut; these buildings are set back behind the two-storeyed English Touring Theatre Company. The northern wing of proposed Block A would introduce stepping-back short elevations opposite nos. 21 and 25 Short Street and a long elevation opposite the properties lining the southern side of The Cut at a distance of approximately 14 metres. The proposed short elevations would be windowless on all floors, meaning no overlooking towards nos. 21 and 25 The Cut would be possible. The proposed long elevation facing the properties on The Cut would incorporate a minimal number of windows and in each case an angled etched glass privacy screen would be fitted externally to preclude direct views outward towards these nearby properties. This satisfactorily mitigates for the failure to achieve the 21 metre separation distance.
80. Immediately to the east of the English Touring Theatre Company building and directly adjacent to the site boundary is no. 35A The Cut. It is this residential property which has habitable room windows nearest to the north elevation of Block A, being approximately 4 metres away. As explained above, the elevation of Block A towards which no. 35A

The Cut faces has been designed to incorporate as few windows as possible and all of these windows would be fitted with a privacy screen. As such, the occupiers of no. 35A The Cut would be protected from undue overlooking.

81. The windows in the remaining elevations of the hotel would face towards the new LeSoCo college building which, given its purely educational use, would be at no risk of invasive overlooking.
82. In summary, the hotel design has taken account of the sensitivity of the nearby residential premises by proposing mitigation measures where it has not been feasible to achieve the separation distances sought by the Residential Design Standards. As a result, and subject to the imposition of a condition stipulating the position and retention of the screens, no nearby occupiers would experience any undue overlooking.

Outlook and sense of enclosure

83. On Burrows Mews, the proposed hotel would have a similar parapet height at third and fourth floor levels to the consented residential scheme, but the overall length of the Burrows Mews elevation would be greater (19.5 metres as opposed to 13.5 metres) and the uppermost two-storeys (fifth and sixth floor levels) would not be as well set-back from Burrows Mews. While the proposed development would curtail the outlook from the Burrows Mews properties more so than the consented residential scheme, it must be recognised that the overall height and scale of the hotel is appropriate in this Central London context, where the townscape is characterised by multiple-storey buildings directly flanking the back of footways, creating a tightly-knit urban grain. It is also important to note there are no ground floor habitable rooms at any of the affected Burrows Mews properties, meaning only from first floor level upwards would any impact be experienced. Taking these factors into account in the round, and although it is recognised that the scheme would exhibit greater presence on Burrows Mews than the consented scheme, the comparative difference in bulk is not of such a magnitude that a harmful increased sense of enclosure or a significantly diminished quality of outlook would arise at any of the Burrows Mews properties.
84. There are existing residential properties on Ufford Street, and consented but as yet unbuilt dwellings on the no. 90-91 Blackfriars Road site. In comparison with the extant residential scheme, the proposed hotel would be no more bulky along the Ufford Street frontage and would therefore not inflict upon these properties any diminished sense of outlook in excess of that which has previously been considered acceptable on this site.
85. The extant residential scheme was set away from the first, second and third floor levels of the Theatre View apartments by 21.0 metres. In comparison, the proposed hotel would be 4.25 metres closer to Theatre View at first and second floor levels but 1.25 metres further away at third floor level. The increased proximity of the first and second floors to Theatre View must be balanced against the more generous set-back of the uppermost floor.. It is also important to note is that, due to being hard against the common boundary, the Theatre View apartments are inevitably going to experience some increased sense of enclosure from any reasonable form of development on the application site. On balance, and having given due regard to the precedent set by the extant residential scheme, it is considered that no unduly diminished quality of outlook or sense of openness would be caused to the occupiers of the Theatre View apartments.

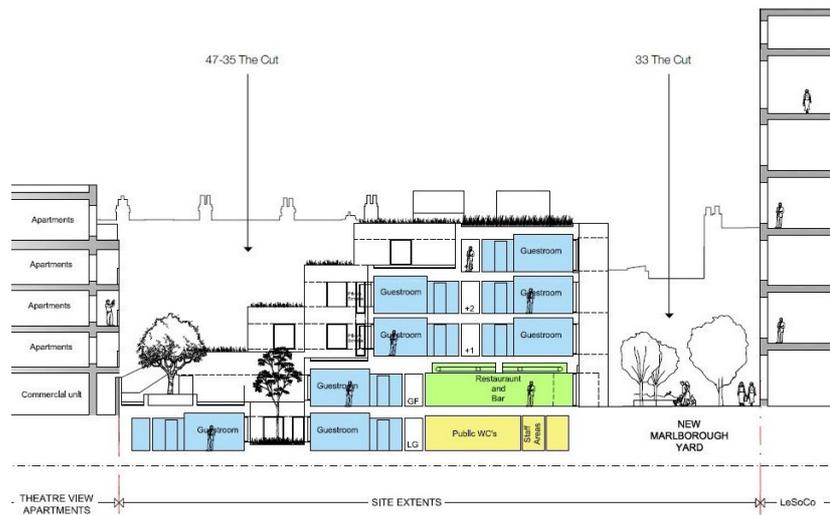


Figure 9: A section taken east-west through Block A, showing how the central wing would incrementally increase in height from one to four storeys above ground level in a stepped-back manner.

86. Nos. 21 and 25 Short Street and nos. 49-35 The Cut enclose the northern edge of the site, with the two-storeyed English Theatre Touring Company providing a separation gap. Block A has been designed to 'step down' in height towards the north-western corner of the site (where no. 25 Short Street and nos. 43-51 The Cut cluster), which is considered appropriate in the interests of ensuring a reasonable sense of outlook is preserved in this rather constrained corner. While the overall height of Block A rises to four storeys at the rear of nos. 35-41 The Cut, the separation distance is adequate not to create any issues of curtailed outlook or increased sense of enclosure.
87. No. 35A The Cut incorporates two boundary-edge clear-glazed windows. The proposed development would be set-away 4.5 metres from the windows and stand four storeys tall. In comparison with the existing situation -whereby the windows enjoy an uninterrupted outlook across the open application site- there would undoubtedly be a significant deterioration in outlook. However, and as with the Theatre View apartments, the sheer proximity of these windows to the application site means any reasonable form of development would lead to some increased sense of enclosure. It must also be recognised that directly to the east of no. 35A The Cut, a pocket park and the New Marlborough Yard through-route are proposed, meaning the other clear-glazed apertures at this dwellinghouse would benefit from a very pleasant and open outlook in the direction of these new public spaces. Thus, on balance, an acceptable quality of outlook and sense of openness would be preserved for the occupiers of no. 35A.
88. In summary, while the hotel proposal would introduce greater bulk to certain parts of the application site than the consented residential scheme, it must also be recognised that there would be comparatively less impact on some of the most sensitive nearby properties. The impact on all sensitive neighbouring properties has been assessed independently of the precedent set by the consented scheme and it is considered that there would be no significantly harmful increased sense of enclosure or curtailed outlook to any dwellings.

Noise disturbance

89. Neighbours have raised concerns about potential noise disturbance from the hotel once operational. The potential sources of noise cited by residents include delivery vehicle movements, taxi movements, extraction/ventilation equipment, air conditioning units, laundry facilities and plant.

90. It is understandable that servicing vehicles will generate some low-level noise, but is also reasonable that in the interests of residential amenity this activity be minimised certainly during night-time hours. As such, and in line with the request of the Council's Environmental Protection Team, a condition will be imposed to restrict hotel/restaurant deliveries to between the hours of 08:00 and 20:00 Monday to Friday and 10:00 and 16:00 on Saturdays, Sundays and Bank Holidays.
91. With regard to taxi movements, the hotel operator will be committed to encouraging guests to arrive via New Marlborough Yard's northern entrance (i.e. off The Cut) so as to limit any increase in traffic on the nearby residential side streets. As discussed in later parts of this report, depending on the availability of drop-off bays on The Cut, some taxis may need to set-down on Ufford Street; however, the hotel operator will implement a series of measures to minimise this number such that noise disturbance for nearby residents would be reduced as much as is reasonably possible.
92. A condition will be imposed requiring details of any extraction, ventilation and air conditioning equipment to be submitted at a later date. The same will also apply to the proposed plant. As part of these separate processes, the noise disturbance potential will be assessed and mitigation secured if necessary to protect neighbours' amenity.
93. The laundry facilities are in all cases enclosed internal spaces located a reasonable distance from the nearest properties. The facilities would not, therefore, generate operational noise injurious to residents' amenity.

Odour disturbance

94. The restaurant ductwork rises to the roof of Block A, but this level is lower than the roof of Block B. For this reason, a high level of odour control is required, and further full details of the system need to be submitted for approval in due course.

Light pollution

95. Neighbours have raised concerns that the proposed exterior lighting, specifically the lighting within the pocket park, may harm residential amenity. Further details of the exterior lighting will need to be submitted for approval in due course to ensure no surrounding properties suffer disturbance. However if this route is to remain open at all times of the day, then street lighting would be required to ensure pedestrian safety, and this would be reasonable in terms of lighting levels for an urban area.

Anti-social behaviour and crime

96. Neighbours have raised concerns that the publicly-accessible realm may, unless well-managed by the hotel operator, foster vandalism, loitering and rough sleeping. Similar concerns were raised during the consultation process for the previous application at this site.
97. In line with the obligations of the previous consented application, a Public Realm Impact Review will be secured through the Section 106 agreement. This obligation will require an Impact Review to be submitted within 4 weeks of the 9-and 18-month anniversaries of the completion of the publicly-accessible realm. Through this mechanism, remedial measures can be agreed where necessary.

Daylight impacts

98. A daylight and sunlight report has been submitted which assesses the scheme based on the Building Research Establishments (BRE) guidelines.

99. The BRE sets out the rationale for testing the daylight impacts of new development through various tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of the original value before the loss is noticeable.
100. 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.
101. Important to note is that the BRE guidelines should be applied flexibly particularly in dense urban locations where such standards can be difficult to achieve.

VSC results

102. Assessed as part of the daylight and sunlight report due to their risk of VSC loss as a result of the works are:
- 2-6 Burrows Mews
 - 84, 85, 88-89 and 90-91 Blackfriars Road
 - 25, 26, 27, 28, 29 and 30 Ufford Street
 - Theatre View apartments
 - 21 and 25 Short Street
 - 33, 35, 35A, 37, 39, 41, 43, 45, 47, 49, 51 and 53 The Cut



Figure 10: Site Location Plan, with all nearby properties annotated

103. The table below sets out only the properties at which VSC losses of 20% or more would

be experienced for some windows, with the losses tallied by degree of adverse impact:

Property	Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)			
	No loss or a loss of up to 20%	20% to 30% (minor adverse impact)	30% to 40% (moderate adverse impact)	40% or over (substantial adverse impact)
5 Burrows Mews				
This application	16	2	1	0
Extant consent	16	3	0	0
6 Burrows Mews				
This application	10	1	3	2
Extant consent	10	5	1	0
90-91 Blackfriars Road (consented but as yet unbuilt scheme)				
This application	149	9	10	13
Extant consent	148	10	11	12
88-89 Blackfriars Road (consented but as yet unbuilt scheme)				
This application	30	4	2	0
Extant consent	30	4	2	0
30 Ufford Street				
This application	7	3	0	0
Extant consent	4	5	1	0
Theatre View Apartments				
This application	17	6	2	3
Extant consent	18	3	4	3
25 Short Street				
This application	28	1	2	0
Extant consent	N/A	N/A	N/A	N/A
35 The Cut				
This application	6	0	1	0
Extant consent	7	0	0	0
35A The Cut				
This application	13	0	1	2
Extant consent	14	2	0	0

Note: omitted from the table above are the VSC levels for windows which serve known non-habitable rooms

104. There are twenty glazed windows serving seventeen rooms that would experience a loss of more than 40% VSC.
105. The greatest losses would be experienced at no. 35A The Cut, where one ground floor window and one first floor window would experience losses of 72.4% and 70.4% respectively. However, this is largely because both windows sit directly on the boundary line, meaning any reasonable development at the application site is going to result in derogations from BRE guidance; accordingly, a degree of flexibility should be applied in these circumstances. It should also be noted that these windows have not always enjoyed such an openness of aspect: up until relatively recently, college buildings of a scale not dissimilar to the proposed hotel stood a comparable distance away from these two windows.
106. The next greatest losses are at no. 90-91 Blackfriars Road (68% loss to one window) and at the Theatre View Apartments (54.4%, 54.0% and 49.8% at three windows). In each case, the VSC loss is less than that consented by the extant residential scheme on this site. It should also be noted that the VSC level of these affected windows is already low and as such any further reduction generates a significant percentage loss. For example, the worst affected window (at no. 90-91 Blackfriars Road) has an existing VSC level of 3.6% and the proposed VSC level would be 1.1%. This means the reduction in VSC is 68% even though the reduction in the VSC level itself is not significant.
107. In summary, while it is recognised that some windows would experience VSC losses in excess of those caused by the consented residential scheme, none of the losses would be substantially greater. Furthermore, the proposed hotel would afford a number of neighbouring windows a better VSC than the consented residential-led scheme. On balance, and taking account of the context within which the hotel would sit, it is considered that the VSC impacts are acceptable.

NSL results

108. Assessed as part of the daylight and sunlight report due to their risk of NSL loss as a result of the works are:
 - Nos. 2-6 Burrows Mews
 - Nos. 84, 85, 88-89 and 90-91 Blackfriars Road
 - Nos. 25, 26, 27, 28, 29 and 30 Ufford Street
 - Theatre View apartments
 - Nos. 21 and 25 Short Street
 - Nos. 33, 35, 35A, 37, 39, 41, 43, 45, 47, 49, 51 and 53 The Cut
109. The table below sets out only the properties at which NSL losses of 20% or more would be experienced, with the losses tallied by degree of adverse impact:

Property	Number of rooms that would experience a NSL reduction (as a percentage of the baseline NSL value)			
	No loss or a loss of up to 20%	20% to 30% (minor adverse impact)	30% to 40% (moderate adverse impact)	40% or over (substantial adverse impact)
90-91 Blackfriars Road (consented but as yet unbuilt scheme)				
This application	98	1	1	3
Extant consent	95	3	3	2
30 Ufford Street				
This application	6	2	0	1
Extant consent	8	1	0	0
Theatre View Apartments				
This application	18	2	2	0
Extant consent	19	1	1	1
35 The Cut				
This application	5	0	1	0
Extant consent	6	0	0	0
35A The Cut				
This application	3	0	1	1
Extant consent	5	0	0	0

Note: omitted from the table above are the NSL levels for windows which serve known non-habitable rooms

110. As the results above show, of the total number of windows assessed, a relatively small proportion would experience a NSL loss of over 20%. On the whole, when compared with the consented residential scheme, there is not a significant difference in the number of windows where an NSL loss would be experienced.
111. The properties affected by the hotel proposal which were not affected at all by the consented residential scheme are nos. 35 and 35A The Cut. However, and as explained in previous parts of this report, the windows at these properties sit either on or very close to the boundary of the application site such that any reasonable development of the land will inevitably result in a worsened NSL. Some of the windows also serve bedrooms, a room type which the BRE guidance recognises as being less sensitive to daylight losses than living rooms or kitchens.
112. In summary, while it is recognised that some windows would experience NSL impacts in excess of those caused by the consented residential scheme, the hotel would cause comparatively less impact to other neighbouring windows. The windows most adversely affected (which in some cases serve bedrooms) sit directly on the boundary of the application site; in these circumstances, and as explained in greater detail in the preceding 'Daylight' section of this report, the BRE guidelines must be applied in a flexible manner giving regard to the Central London site context. As such, the relatively

small number of NSL deviations the proposed hotel would cause is considered acceptable.

Sunlight impacts

113. All of the windows facing within 90 degrees of due south have been assessed with regards to impact on sunlight. The BRE guide states that nearby windows must be assessed to determine whether any of the following would be experienced:
 - a reduction in sunlight to less than 25% Annual Probable Sunlight Hours (APSH), or;
 - a reduction in sunlight to less than 5% Winter Annual Probable Sunlight Hours (WAPSH) or;
 - both of the above.
114. Where any of the above occurs, if the window's resulting APSH is less than 0.8 times its former value, there may be an appreciable loss of sunlight.
115. Assessed as part of the Report due to their risk of sunlight loss are the south-facing windows at the following addresses:
 - Nos. 84, 85, 88-89 and 90-91 Blackfriars Road;
 - Nos. 21 and 25 Short Street, and;
 - Nos. 35, 35A, 37, 39, 41, 43, 45, 47, 49, 51 and 53 The Cut.
116. It is only at no. 35A The Cut that the requirements of the BRE Guidelines would not be met. Three windows (those which sit directly on the common boundary) would be affected. Respectively, the windows would experience 0.27, 0.28 and 0.55 times their former APSH values as a result of the proposed development. While these losses are significant, two of the windows serve bedrooms (a use recognised by the guidelines as being less sensitive to sunlight losses) and the other one serves a dual aspect room. It must also be recognised that the property is located hard against the site boundary and currently benefits from an open outlook across the empty application site, which is highly unusual in a dense central London location such as this. Taking these factors into account in the round, together with the good quality of outlook no. 35A The Cut would continue to enjoy, it is considered that the sunlight losses are permissible in this instance.

Overshadowing

117. By virtue of their orientation and relationship to the site, the only properties with amenity spaces susceptible to overshadowing are:
 - Theatre View apartments,
 - Nos. 21 and 25 Short Street, and;
 - Nos. 35, 37, 39, 41, 43, 45, 47, 49, 51 and 53 The Cut.
118. An Overshadowing Assessment has not been submitted in support of the application, but this is reasonable given that no report was required for the previous (extant) application and the massing and form of Block A do not markedly differ from the consented scheme.
119. Block A wraps around a central terraced courtyard which flanks the majority of the site's western boundary. Together with the modest overall height and scale of the building, the openness created by the courtyard void would ensure no overshadowing is experienced to the balconies at the Theatre View apartments.

120. The ground level amenity spaces at nos. 21 and 25 Short Street would adjoin the northern wing of Block A. This is the lowest part of the proposed hotel building, from where each storey of the building would 'step up' gradually. The effect of these 'cascading' storeys is that light would be channelled into the gardens of the Short Street properties, thereby guarding against any undue overshadowing.
121. With the exception of no. 35A, all the properties on The Cut have small courtyards set a good distance away from the site, directly behind the two-storeyed English Theatre Touring Company, and thus would not be overshadowed any more so than at present. No. 35A is positioned adjacent to the part of the site where the pocket park is to be created, meaning the dwelling's amenity spaces would benefit from a good degree of openness such that any increased overshadowing would not be detrimental.
122. In summary, careful consideration has been given by the applicants to the separation, height, scale and massing of the proposed development in order that no excessive overshadowing of nearby gardens, balconies or terraces would occur.

Amenity impacts arising from the construction process

123. Local residents have raised concerns that the construction phase will impact on their amenity, citing potential sources as noise, dust, dirt and diesel particulate pollution from construction vehicles. Local business owners have similarly raised concerns about how noise, scaffolding, obstructions etc. associated with the works may affect their operations.
124. With regard to noise, it is inevitable that there will be some disruption and disturbance during the works. It is also recognised that works of the kind proposed are likely to raise level of dust and particulate matter unless there are suitable control measures. These impacts would, however, be for a temporary period and must be balanced with the long-term benefit brought by the development.
125. In the interests of minimising impacts from noise, dust and emissions pollution it is recommended that a construction management plan be submitted and approved prior to commencement.
126. The Plan will also set out how working practices will uphold health and safety for local residents, ensuring the site is kept clean, well-maintained and free of obstacles.

Transport and highway matters

Trip generation

127. The application site benefits from extremely good public transport accessibility. The transport assessment has carried out a robust trip generation assessment, the conclusion of which is that the vast majority of hotel guests and staff would arrive by public transport. The anticipated level of public transport trips would not have a detrimental impact on existing public transport services given the extensive provision of rail, underground and bus routes operating in the local vicinity.
128. Some of the trip generation would be from coach and taxi/private hire vehicles, the implications of which are discussed in subsequent parts of this report.
129. A detailed travel plan will be secured by condition to ensure that a long-term strategy is in place to facilitate and encourage sustainable modes of travel to the hotel.

Coach drop-offs

130. Coach drop-offs would take place from the existing coach bays located on Blackfriars Road; one bay is located to the south of Meymott Street on the western side of Blackfriars Road and the other bay is located outside Vaughan House on the eastern side of Blackfriars Road. Both are an approximate 3 minute walk from the proposed hotel entrance. The Meymott Street bay does not restrict dwell times but the Vaughan House bay is restricted to 2 minutes. Both bays can accommodate one large coach at any one time.
131. The applicants have provided a back-up strategy in the (albeit unlikely) event a coach of hotel guests being unable to set down in either bay because they are already occupied by another vehicle. The Transport Policy team have assessed this strategy and consider it to be robust.

Taxi drop-offs

132. The Transport Statement indicates that a total of 92 taxi/private hire movements per day are expected to be generated by the proposed hotel, with 6 (3 arrivals and 3 departures) happening within the AM peak of 9:00-10:00 and 14 (7 arrivals and 7 departures) in the PM peak of 18:00-19:00. The Transport Statement sets out that the majority taxi drop-offs are to take place on The Cut, which provides parking bays where taxi/private hire pick-up and drop-off activity is permitted.
133. The kerbside of The Cut is finite, with parking and delivery bays at high capacity. As such, and while it would be preferable for taxi drop-offs to take place on The Cut, there is a possibility that bays would not always be available; a taxi looking for an alternative set down would likely come to Ufford Street and potentially onto Burrows Mews. This issue was raised with the applicants.
134. In response, the hotel operator would implement a Taxi Management Plan, the aim of which would be to direct hotel taxi trips to The Cut. The Plan would require the hotel operator to sign up to a number of good practice principles. Other measures would include providing guests with travel information details highlighting the excellent public transport opportunities available within proximity of the hotel, the provision of 24 hour tube services operating from Southwark underground station and details of walking and cycling facilities such as nearby docking stations and the Cycle Superhighway on Blackfriars Road. Leaflets and the hotel website would provide key details of the opportunities to travel by public transport modes other than taxi.
135. Furthermore, the applicant has agreed to enter into a Bond agreement, whereby a £10,000 sum is secured through the Section 106 agreement for remedial works in the event the Taxi Management Plan is considered ineffective. This would be determined after monitoring the hotel's first year of operations. Should the Taxi Management Plan be considered successful, the sum would be returned.
136. In summary, the measures outlined above are considered sufficient to minimise the total number of taxi drop-offs and, where drop-offs would take place, to encourage the use of The Cut. Through the bond mechanism, the effectiveness of the taxi drop-off strategy during the hotel's first year of operation can be monitored and remedial highway works funded if necessary.

Car parking

137. The proposal is located within the Central Activities Zone (CAZ) and a Controlled Parking Zone (CPZ). Given the excellent accessibility to public transport, the car free nature of the development is appropriate. No on-site disabled parking would be

delivered, but the streets in the immediate vicinity (Ufford Street, Short Street or The Cut) have the capacity to accommodate blue badge holders.

Cycle parking

138. The proposals in their current format provide:

- 16 cycle parking spaces for long-term use, to be located in sheltered and secure storage towards the eastern end of East Mews, and;
- 6 cycle parking spaces for short-stay visitors, in the form of Sheffield stands and to be located close to the hotel reception.

139. However, no cycle spaces for visitors to the restaurant have been provided, despite this being a requirement of the London Plan. A further ten short-stay space would be required for restaurant visitors. These can be easily accommodated within New Marlborough Yard, and this will be a condition requirement.

Servicing

140. There are expected to be between 5 and 6 deliveries (laundry, catering, mail etc.) per day associated with the hotel. These vehicles would drop off and collect from within the site, on the proposed East Mews 'shared space'. Tracking diagrams have been provided to show that smaller vehicles (box vans etc.) would have adequate room to manoeuvre on site such that they can enter and exit in forward gear. Larger vehicles (such as lorries and large refuse trucks) would reverse into the site from Burrows Mews, enabling an exit in forward gear to be made. Given that Burrows Mews is a no-through road, not highly-trafficked, and already used for servicing purposes, this strategy is considered acceptable.

141. The Transport Assessment proposes that vehicles would approach the site via The Cut, turning onto Short Street and thereafter onto Ufford Street in order to access East Mews from Burrows Mews. This routing was agreed upon through consultation with the Transport Policy team so that servicing vehicles would avoid Webber Street where a Quietway has recently been introduced. When exiting the site, vehicles would turn right out of Burrow Mews onto Ufford Street and then left onto Boundary Row. Boundary Row is a one-way street providing access onto the A201 Blackfriars Road. This routing strategy is considered satisfactory.

Refuse storage

142. A large refuse store room is proposed at basement level which would provide for the needs of both the restaurant and hotel. Separate storage facilities for general mixed waste, glass and food waste are proposed. Refuse collections would be conducted by a private refuse contractor on a daily basis from Monday to Friday. Prior to collection, staff would transfer the bins from the store room, up one storey (using the dedicated service lift) to the western end of East Mews.

143. The store room is adequate to meet the needs of the premises and the collection strategy is sound.

Flood risk and sustainable urban drainage

Flood risk and flood resilience

144. The Environment Agency and Southwark Council's flood risk management team were both consulted on the application.

145. The flood risk management team raised objections to the proposal due to the site being within Flood Zone 3 and at risk under the 2100 year breach scenario. Ultimately, however, the team accepts that that management of fluvial/tidal flood risk associated with main rivers does not fall within their remit as a Lead Local Flood Authority, and that this is the responsibility of the Environment Agency. Accordingly, they recognise that the advice of the Environment Agency should be relied on.
146. The extant permission on this site (ref: 15/AP/3024) incorporated basement-level sleeping accommodation. Due to forming part of dwellings, this sleeping accommodation fell within the “more vulnerable” category of the nationally-prescribed flood risk vulnerability classification. A hotel use also falls within the “more vulnerable” category.
147. In comparison to dwellings, hotels hold a great deal more scope to be continuously and effectively monitored for flood risk. As such, the risk to life within hotel sleeping accommodation below the breach level is, where monitoring is in place, less than the risk to life within dwelling sleeping accommodation.
148. A detailed flood evacuation plan has been supplied by the applicant and has been updated a number of times in response to issues raised by the Environment Agency. The final hotel proposal incorporates a number of permanent and temporary measures designed to limit the risk of an inundation in the event of a breach of the River Thames.
149. The Environment Agency has ultimately resolved not to object to the proposal on flood risk grounds. The Local Planning Authority concurs that the proposal has made more than adequate efforts to incorporate flood resilience and minimise flood risk. As such, no concerns remain and a condition will be imposed to ensure the Flood Evacuation Plan is adhered to.

Sustainable urban drainage

150. The council’s flood and drainage team has recognised that not until landscaping and green roofs matters have been finalised can a full surface water drainage strategy be resolved. Accordingly, a drainage strategy will be secured by condition.

Trees, landscaping, public realm and biodiversity

Trees

151. The proposed development requires the removal of 15 trees (some of these have already been removed as part of the demolition works, which is acceptable as none are subject to TPOs). None of the 15 affected trees are particularly high quality. The trees to be lost can be more than adequately mitigated for by the proposed landscaping which includes planting within courtyards and on Ufford Street, as well as on the new avenue through the site.
152. Conditions are recommended to secure the new specimens are of an appropriate size and maturity.
153. While basement excavation work would be undertaken close to the retained street tree on Ufford Street, this has been fully assessed as a feasible retention. The imposition of conditions ensuring the protection of retained trees is recommended.

Landscaping and public realm

154. Landscaping and public realm would be delivered in the form of New Marlborough Yard, East Mews and the pocket park close to the northern entrance of the site. Additionally,

the proposed building line on Ufford Street has been set-back to create a more generous footway width than at present.

155. The proposed pocket park would contain lawn, border planting and retained trees together with outdoor seating and sculptures. This will make for a convivial and inviting public space. New Marlborough Yard and East Mews would be hard surfaced in concrete setts and granite banding strips, supplemented by soft landscaping in the form of border planting, numerous new trees and evergreen climbers.
156. The terraced courtyard space enclosed by Block A and the Theatre View apartments would comprise a series of green roofs. The lowest roof would contain wildflower and three trees, while the two upper roofs would be sedum. This would ensure that hotel guests and residents of the Theatre View apartments enjoy a pleasant outlook. Details of the planting regimes for these roofs are to be sought by condition, with a requirement that the species are evergreen, hard-weathering and require minimal maintenance.
157. A detailed scheme of landscaping will be secured by condition.

Biodiversity

158. The proposed planting and green roofs are welcomed as these will enhance ecology in the local area.
159. At the request of Southwark Council's ecologist, a condition will be imposed requiring the design to incorporate 10 bird boxes and 6 nesting brick/boxes.

Environmental matters

Land contamination

160. Gas protection measures are required in the new build, as well as clean imported soils to cover the made ground in any soft landscaped area. As such a full Remediation Report detailing the measures to be implemented and a Validation Report are to be secured by condition

Archaeology

161. The applicants have submitted a desk based assessment (DBA) and have also commissioned the carrying out of a programme of archaeological evaluation trenching and geo-archaeological borehole sampling on the site. This work is currently taking place on site and the results of the works are not yet known.
162. On the basis of the information available at this time, Southwark Council's Archaeologist has advised that three safeguarding conditions ('Archaeological Evaluation', 'Archaeological Mitigation' and 'Archaeological Reporting') be attached to any grant of consent.

Sustainability

Carbon emissions and renewable technologies

163. London Plan Policy 5.2 requires a reduction in carbon emissions of 35% below the Part L 2013 target; unlike with residential developments, there is no requirement for hotel developments to be carbon neutral.
164. A detailed energy assessment has been submitted as part of the application to demonstrate how the targets for carbon dioxide emissions reduction are to be met.

Overall, the development would achieve a carbon saving of 35.2%, thereby meeting the policy requirement. This has been achieved by proposing a site-wide Combined Heat and Power (CHP) network together with air source heat pumps. The energy strategy is, therefore, acceptable and it is recommended that a condition be imposed to secure the details for the development.

165. A condition will also be imposed to ensure that evidence is submitted to and approved by the Local Planning Authority to show that the proposal has been designed to allow for future connection into the district CHP network if/when this becomes feasible.

BREEAM

166. The works would be required to achieve an “excellent” rating. A BREEAM pre-assessment has been submitted as part of the application documents which demonstrate that achieving this rating is feasible.
167. Achieving “excellent” is to be a condition requirement. This will ensure the works take sufficient consideration of sustainability.

Air Quality

168. London Plan policy 7.14 states that development proposals should minimise exposure to poor air quality, being at least ‘air quality neutral’. This is particularly the case where developments are located within designated Air Quality Management Areas (AQMA) as is the case with this proposal. Southwark Plan policy 3.6 advises that planning permission will not be granted where a development leads to a reduction in air quality
169. The development would achieve air quality neutrality and therefore would not impact nearby sensitive receptors. The environmental protection team considered the submitted assessment to be acceptable. Notwithstanding, the team has requested that conditions be imposed to: ensure compliance with the air quality assessment; ensure that the CHP uses natural gas and meets the relevant standards for its size, and; require gas boilers to meet ‘ultra-low NOx’ criteria. Accordingly, these conditions will be imposed.

Employment benefits

170. Strategic Policy 10 of the core strategy aims to increase the number of jobs in Southwark and ensure that local people and businesses benefit from opportunities which are generated from development. A headline economic assessment was submitted by the agent in support of the application. The document predicts that the proposed development would generate a net direct employment (i.e. not including jobs that would have otherwise occurred elsewhere) of between 85 and 90 jobs. In this regard, the proposal makes a significant employment offer to the borough in accordance with the aims of Strategic Policy 10.
171. The development would be expected to deliver 19 sustained jobs to unemployed Southwark residents, 19 short courses, and take on 5 construction industry apprentices during the construction phase. In the event that the developer does not undertake to deliver the employment outputs themselves, an employment and training contribution of £92,050 (£81,700 against sustained jobs, £2,850 against short courses, and £7,500 against construction industry apprenticeships) would be required. This will be secured in the Section 106 Agreement, as will an employment, skills and business support plan.
172. The completed hotel would be expected to deliver 18 sustained jobs to unemployed Southwark residents. The maximum end use shortfall contribution would be £77,400 (based on £4,300 per job). This will be secured in the Section 106 Agreement, as will an

employment, skills and business support plan.

Community engagement

173. The applicant's statement of community involvement details the consultation undertaken before the full application was submitted. These community engagement efforts included:
- Meeting local councillors;
 - Meeting local groups, BIDs, housing associations, community development groups and local trusts;
 - Holding meetings with the residents of properties which back on to the site;
 - Holding two separate public drop-in sessions at the St Andrews Church and Vicarage (invitations distributed locally beforehand to approximately 400 homes and businesses);
 - Holding a public drop-in session at the South Bank Forum, and;
 - Issuing press releases in 'SE1' and 'Southwark News' to publicise the public drop-in events.
174. The statement of community involvement lists the comments received from the pre-application consultation, and provides a response to each comment. The Statement of Community Involvement and the Design Access Statement describe how the design evolution was informed by the community consultation.
175. Notwithstanding that there are no statutory requirements in relation to Community Involvement, this is considered to be an adequate effort to engage with those affected by the proposals. As part of its statutory requirements, The Local Planning Authority, sent letters to all residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. The responses received are summarised later in this report.

Planning obligations and other financial contributions

Crossrail

176. The site is within the Central London Crossrail S.106 contribution area. In this location, for every 1 square metre of new hotel floorspace a fee of £61 is levied and for every 1 square metre of new restaurant floorspace a fee of £90 applies. For this proposal, a total Crossrail contribution of £567,345 would be triggered, calculated on the following basis:

$$\begin{aligned} & (\text{£}90 \times 336 \text{ square metres of A3 floorspace}) = \text{£}30,240 \\ & + (\text{£}61 \times 8805 \text{ square metres of C3 floorspace}) = \text{£}537,105 \\ & \text{TOTAL} = \underline{\underline{\text{£}567,345}} \end{aligned}$$

177. This sum is subject to indexation, as per the provisions of Section 5 of the Crossrail Funding SPG (2016).

Mayoral and Southwark CIL

178. 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 investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure that supports growth in Southwark.

179. The following levies would apply:

- MCIL = 9,238 sqm x £35/sqm x 313/223 = £453,822 (indexed)
- SCIL (Zone 2 Hotel) = 9,238 sqm x £136/sqm x 313/280 = £1,404,440 (indexed)

180. To avoid double charging, pursuant to policy 4.17 of the Crossrail Funding SPG 2016, the Mayoral CIL amount is deducted from the Crossrail contribution (which itself is subject to indexation). A clause accounting for this will be included within the Section 106 agreement.

Section 106

181. Saved Policy 2.5 'Planning Obligations' advises that planning obligations should be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 is reinforced by the *Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD*, which sets out in detail the type of development that qualifies for planning obligations.

182. In accordance with Southwark's *Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD*, the following contributions have been agreed with the applicant, in order to mitigate the impacts of the development:

Planning obligation	Mitigation	Applicant's position
LOCAL ECONOMY: CONSTRUCTION PHASE JOB/CONTRIBUTIONS	Development to: <ul style="list-style-type: none"> • Deliver 19 sustained jobs to unemployed Southwark residents, • Deliver 19 short courses, and; • Take on 5 construction industry apprentices during the construction phase. <p><u>Or</u> make the pro-rata Employment and Training Contribution which, at maximum, would be £92,050:</p> <ul style="list-style-type: none"> • £81,700 against sustained jobs; • £2,850 against short courses, and; • £7,500 against construction industry apprenticeships. 	Agreed
LOCAL ECONOMY: CONSTRUCTION PHASE EMPLOYMENT, SKILLS AND BUSINESS SUPPORT PLAN	The Plan would be expected to detail: <ul style="list-style-type: none"> • Methodology of training, skills, support etc. • Targets for construction skills and employment outputs • Methodology for delivering apprenticeships • Local supply chain activity methodology 	Agreed
LOCAL ECONOMY: 'END USE' JOBS/CONTRIBUTIONS	Hotel to: <ul style="list-style-type: none"> • Deliver 18 sustained jobs for unemployed Southwark Residents at the end phase, <p><u>Or</u> meet any shortfall through the Employment in the End Use Shortfall Contribution on a pro-rata basis which, at maximum, would be £77,400 (based of £4300 per job).</p>	Agreed
LOCAL ECONOMY:	The Plan would be expected to detail:	Agreed

<p>'END USE' EMPLOYMENT, SKILLS AND BUSINESS SUPPORT PLAN</p>	<ul style="list-style-type: none"> • The 'Sustainable Employment Opportunities and apprenticeships' delivery mechanism • Key milestones for filling the employment opportunities and apprenticeships • Skills and training gaps • How to encourage applications from unemployed Borough residents. 	
<p>HIGHWAY WORKS</p>	<p>Prior to implementation, the Developer is to submit for approval the s278 specification and estimated costs.</p> <p>Prior to commencement of highway works, the Developer is to enter into a Highway Agreement for the purposes authorising the works etc.</p> <p>Prior to construction, the following is to be submitted for consideration by the Structures Team:</p> <ul style="list-style-type: none"> • An AIP (because the proposed basement adjoins a public highway). <p>The works, as listed below, are to be completed in accordance with the Highway agreement:</p> <ul style="list-style-type: none"> • Repave the footway on Ufford Street, Burrows Mews and The Cut with silver grey natural stone granite slabs and 300mm wide silver grey natural granite kerbs as per SSDM specifications • Widen the footway on Burrows Mews to 3.0 metres • Install a raised entry table on the junction of Ufford Street and Burrows Mews 	<p>Agreed</p>
<p>HIGHWAYS BOND AGREEMENT</p>	<p>During the first year of hotel operation the highways impacts shall be monitored at the end of which the sum of £10,000 is either retained (if remedial works are necessary) or returned (if the management strategy has proved effective).</p>	<p>Agreed</p>
<p>DELIVERY AND MANAGEMENT OF PUBLICLY-ACCESSIBLE REALM</p>	<p>Publicly-accessible realm is to be designed to incorporate principles of Secured by Design</p> <p>Development not to be implemented until publicly-accessible realm and landscaping has been agreed with the council</p> <p>Publicly-accessible realm to be designed to an adoptable standard.</p> <p>Certificate to be served on the Council upon completion of the layout out, construction and/or planting of those parts of the public realm which are to be managed and maintained by the Developer.</p> <p>Any defects reported within 12 months are to be rectified.</p> <p>Developer covenants to manage, maintain and allow public access except for a limited period in</p>	<p>Agreed</p>

	<p>certain circumstances (fire, flood, carrying of essential maintenance etc.) and shall close the route (with prior notification to members of the public) for up to one day per year so as to prevent public rights of way being obtained.</p> <p>Impact Review to be submitted within 4 weeks of the 9-and 18-month anniversaries of the completion of the publicly-accessible realm. Remedial measures to be agreed if necessary.</p>	
FUTUREPROOFING FOR CONNECTION TO DISTRICT CHP	Prior to occupation, a CHP Energy Strategy must be approved setting out how the development will be designed and built so that it will be capable of connecting to the District CHP in the future.	Agreed
CROSSRAIL CONTRIBUTION	As detailed above, the Crossrail Contribution would be £567,345 in total (subject to indexation).	Agree with calculation in principle, noting that this calculation is subject to indexation.
Administration fee	<p>Payment to cover the costs of monitoring these necessary planning obligations calculated as 2% of total sum.</p> <p>As such, the administration fee would be 2% of the difference between MCIL and Crossrail which, without the benefit of indexation, would be: [(£567,345.00- £453,822) = £2,630.46</p>	Agreed in principle. Agent requests that this is only 2% net of deducting MCIL from the Crossrail SPG, which the LPA accepts.

183. These obligations are necessary to make the development acceptable in planning terms, mitigating for its adverse impacts. In the event that a satisfactory legal agreement has not been entered into by 28 May 2018 it is recommended that the director of planning refuses planning permission, if appropriate, for the following reason:

“The proposal, by failing to provide for appropriate planning obligations secured through the completion of a Section 106 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), and Southwark Council's Planning Obligations and Community Infrastructure Levy SPD (2015).”

Consultation responses: Members of the public

Total number of representations:	36				
In favour:	9	Against:	22	Neutral:	5
Petitions in favour:	0	Petitions against:	0		

184. The material planning considerations raised by the consultation responses are as

follows.

185. Principle of development:

- The proposed development would result in an overconcentration of hotels in the surrounding area.
- The proposed development would not contribute to sustaining and supporting the local community.
- A more appropriate use of this site would be for residential development.

186. Design quality and site layout:

- The overall height is excessive.
- The proportions of the proposed east elevation (fronting onto Burrows Mews) are excessive.
- The fencing enclosing the proposed pocket park is prison-like.
- The outdoor dining tables extend too far northwards towards the residential properties located on The Cut.

NOTE: The agent has supplied a plan showing that the outdoor dining space would extend no further to the north than the extent of the restaurant frontage, and a condition is recommended requiring that outdoor dining space be contained within this zone for the lifetime of the hotel.

187. Neighbour amenity impacts during the construction phase:

- Disturbance to nearby occupiers due to an increase in noise, dust, dirt and diesel particulate pollution from construction vehicles.
- Noise disturbance to the English Touring Theatre company.
Note: There is nothing to suggest that the works would take an overly long period of time to carry out and the contractor will be required to carry out work within Southwark Council's Core Working Hours. Although noise impacts would occur, these would be for a temporary period and must be balanced with the long-term benefit brought by the redevelopment. The Developer will be required to submit for approval prior to commencement a Construction Management Plan which will detail, among other things, how amenity impacts on local residents will be minimised.
- Impact on local businesses during construction period (scaffolding, noise, access obstructions etc.)

188. Neighbour amenity impacts from the hotel (i.e. post-construction):

- Loss of daylight and sunlight to nearby properties.
- Overshadowing of outdoor amenity spaces at nearby properties.
- Increased sense of enclosure and diminished quality of outlook for nearby properties from the proposed hotel building and the fence bordering the proposed pocket park.
- Overlooking of neighbouring properties from the hotel bedrooms.
- Overlooking of neighbouring properties if hotel visitors are allowed access to the terraced rooftop gardens.
- Noise disturbance from guests, delivery vehicles, extraction/ventilation, air conditioning of rooms, laundry facilities, plant etc.
- Smells from any extraction/ventilation equipment.
- Smell disturbance may arise if bins are to be stored in the accessway adjacent to the properties which front onto the Cut.

NOTE: The agent has confirmed that all bin storage associated with the restaurant would be within the dedicated storage room, not on the accessway.

- The proposed emergency access door directly opposite the boundary-edge windows at no. 35 The Cut would be unneighbourly.
NOTE: The design of the proposal was amended to directly address this concern.
- Increased light disturbance for nearby occupiers if the lighting in the pocket park is not oriented downwards.

189. Transport, highways, deliveries and servicing matters:

- The provision for taxi drop-offs is inadequate.
- Ufford Street, Short Street and Burrows Mews are too narrow to enable servicing and delivery vehicles to manoeuvre safely and with ease.
- Hours between which deliveries and servicing can take should be restricted.
- Routing delivery and servicing vehicles along the Cut would result in further unwelcomed congestion.
- Increased vehicle trips as a result of the development may result in damage to street trees and street furniture.

190. Security and prevention of anti-social behaviour:

- Better demonstration of how the lighting strategy for the public space and pocket park would discourage vandalism, loitering etc. is needed.
- The application does not indicate how the publicly-accessible space and pocket park will be managed by the hotel operator.
- The design of the furniture within the pocket park may encourage homeless sleepers.

191. Environmental matters:

- The development would result in a loss of biodiversity.

192. Other matters

- The development description lacks precision and could potentially allow for an additional storey to be constructed above that which the drawings suggest.
- The application drawings do not depict in a suitable level of detail the size and positioning of rooftop plant.

193. All of these matters have been addressed in the assessment parts of this Report.

194. Although a number of other matters were raised by members of the public, such as anticipated loss of property value and the developer's financial motivations, these do not constitute material planning considerations and thus cannot be taken into consideration.

195. Of those representations received in support, the following positive aspects of the proposal were highlighted:

- The development would bring more trade to the area.
- The site is well located in relation to public transport.
- The development would contribute to and consolidate the tourism offer of the area
- The proposal shows compliance with the intent of the Southwark and Waterloo Neighbourhood Plan.

Consultation responses: statutory consultees

Environment Agency

196. No objection, but with the following comments (summarised):

- The 2017 Tidal Thames Breach Inundation Modelling shows that the basement level could experience a potential flood depth of 3.28m AOD.
- The basement and ground level have provision of several internal staircases to communal safe havens above the breach level, which is a positive aspect.
- The evacuation plan would need to be approved by the Local Planning Authority's Emergency Planning Department.
- The hotel operator should register with the Environment Agency's flood warning service, 'FloodLine' to prepare themselves in case of a flood event.

Historic England

197. Do not consider that it is necessary for this application to be notified to Historic England.

Metropolitan Police

198. No objection, but with the following comments (summarised):

- The development could achieve the security requirements of Secured by Design.
- A 'Secured by Design' condition for the whole development should be attached to any grant of permission

Natural England

199. No objection, no comments.

Transport for London

200. No objection, but with the following comments (summarised):

- No showers and lockers are proposed to be installed for the use of cycling staff. The proposal must ensure the provision of these facilities for staff members and this should be secured by condition.
- The short-stay cycle storage doesn't meet the minimum requirements. Ensuring adequate provision should be secured by condition.
- An alternative should be devised in the event of taxi and private hire drop-offs and pick-ups not being possible on The Cut due to parking bays being unavailable.
- A management plan should be put in place which considers the eventuality of coaches being unable to set down on the Blackfriars Road bays and consideration should be given to having a no coach policy.
- A PERS audit should be undertaken to confirm that routes to bus stops and the station are suitable for those with less mobility (including those with luggage as well as disabled people).
- A Construction Logistics Plan should be secured by condition
- A full Transport Plan should be secured by condition.

Thames Water

201. No objections, but conditions recommended:

- Impact studies of the existing water supply infrastructure are to be submitted to and approved in writing by the local planning authority
- No piling is to take place until a Piling Method Statement has been submitted to an approved in writing by the local planning authority.

Community impact statement

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

a) The impact on local people is set out above.

b) Issues relevant to particular communities/groups likely to be affected by the proposal have, where applicable, been identified in earlier parts of this report.

c) The likely adverse or less good implications for any particular communities/groups have also been discussed above, along with specific actions necessary to ameliorate these implications.

Consultations

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

Human rights implications

204. 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.

205. This application has the legitimate aim of providing a hotel and restaurant with ancillary bar. 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.

Conclusion on planning issues

206. The proposal would be acceptable in land use terms and would support the tourism offer of this part of the borough, which benefits from the highest possible public transport accessibility and is within both the Central Activities Zone and an Opportunity Area. The development would not result in an overconcentration of hotels to the exclusion of other land uses and would maintain the vibrant and mixed-use character of the surrounding area.

207. The proposal would achieve an acceptable quality of design and cause no substantial harm to the setting of the nearby Conservation Areas and listed buildings. Incorporating robust and good quality materials and elevational details, the building would relate satisfactorily to both the historic context and the emerging character of new buildings at LeSoCo and on Blackfriars Road.

208. The hotel has been oriented towards The Cut in an effort to minimise the impact on Ufford Street, which is of a much quieter character, while the building's size, scale and

streetscene impact would not be dissimilar to the extant residential-led permission granted in 2016. The proposal would introduce a new 'discoverable' public route connecting Ufford Street to The Cut, and a new landscaped pocket park in this densely developed area.

209. It is acknowledged that there would be an adverse impact on daylight and sunlight to a small number of nearby properties. However, with the exception of one dwelling which has windows directly on the boundary line of the application site, the losses are similar to those incurred by the consented residential scheme and are not untypical for a central London location such as this. On balance, while recognising the impacts, it is concluded that the merits of the scheme, and the context within which it would sit, would not justify the refusal of planning permission.
210. The application raises no other neighbour amenity concerns, and while a number of objections were received about the risk of increased noise and disturbance resulting from the construction phase and day-to-day operations of the completed hotel, it is considered that the impacts can be mitigated through the imposition of conditions.
211. The trip generation, servicing arrangements and travel plan principles are all acceptable, while cycle storage provision can be increased to meet London Plan standards through the subsequent 'approval of conditions' stage. As a precautionary measure, a bond will be secured so that highways impacts can be monitored over the course of the first year of hotel operation to allow for remedial works if necessary.
212. In line with the requirements of the NPPF, the council has applied the presumption in favour of sustainable development. The proposed development would accord with sustainable principles and would make efficient use of the land to deliver a high quality development that is in accordance with the council's aspirations for the area. It is therefore recommended that Members grant permission, subject to conditions as set out in the attached draft decision notice, and the timely completion of a Section 106 Agreement.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1232-B Application file: 17/AP/4042 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5535 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	Patrick Cronin, Planner	
Version	Final	
Dated	7 March 2018	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director of 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		8 March 2018

APPENDIX 1

Consultation undertaken

Site notice date: 10/11/2017

Press notice date: 18/01/2018

Case officer site visit date: 08/12/2017

Neighbour consultation letters sent: 09/11/2017

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

EDF Energy
Environment Agency
Historic England
London Fire & Emergency Planning Authority
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:

66 The Cut Lambeth SE1	Flat 7 84 Blackfriars Road SE1 8HA
80 The Cut Lambeth SE1	Flat 6 84 Blackfriars Road SE1 8HA
82 The Cut Lambeth SE1	Basement Flat 77 Blackfriars Road SE1 8HA
84 The Cut Lambeth SE1	Fourth Floor Flat 1 The Cut SE1 8JZ
86 The Cut Lambeth SE1	Flat D 33 The Cut SE1 8LF
65 Mitre Road Lambeth SE1	Basement Flat 81 Blackfriars Road SE1 8HA
66 Mitre Road Lambeth SE1	Flat 1c 1 The Cut SE1 8JZ
67 Mitre Road Lambeth SE1	Flat 1b 1 The Cut SE1 8JZ
68 Mitre Road Lambeth SE1	Flat 1 84 Blackfriars Road SE1 8HA
69 Mitre Road Lambeth SE1	Flat 2 84 Blackfriars Road SE1 8HA
70 Mitre Road Lambeth SE1	Flat 5 84 Blackfriars Road SE1 8HA
72 Mitre Road Lambeth SE1	Flat 4 84 Blackfriars Road SE1 8HA
74 Mitre Road Lambeth SE1	Flat 3 84 Blackfriars Road SE1 8HA
76 Mitre Road Lambeth SE1	St Andrews Church Hall 4-15 Short Street SE1 8LJ
80 Mitre Road Lambeth SE1	8 Boundary Row London SE1 8HP
82 Mitre Road Lambeth SE1	Basement And Part Ground Floor 88-89 Blackfriars Road SE1 8HA
84 Mitre Road Lambeth SE1	Basement And Rear Of 25 Short Street SE1 8LJ
86 Mitre Road Lambeth SE1	First Floor 33 The Cut SE1 8LF
88 Mitre Road Lambeth SE1	Basement And Ground Floor 33 The Cut SE1 8LF
90 Mitre Road Lambeth SE1	Ground Floor 25 Short Street SE1 8LJ

92 Mitre Road Lambeth SE1
 94 Mitre Road Lambeth SE1
 96 Mitre Road Lambeth SE1
 98 Mitre Road Lambeth SE1
 100 Mitre Road Lambeth SE1
 102 Mitre Road Lambeth SE1
 104 Mitre Road Lambeth SE1
 106 Mitre Road Lambeth SE1
 108 Mitre Road Lambeth SE1
 109 Mitre Road Lambeth SE1
 110 Mitre Road Lambeth SE1
 111 Mitre Road Lambeth SE1
 112 Mitre Road Lambeth SE1
 1 Mitre Road SE1
 2 Mitre Road SE1
 3 Mitre Road SE1
 4 Mitre Road SE1
 5 Mitre Road SE1
 6 Mitre Road SE1
 7 Mitre Road SE1
 8 Mitre Road SE1
 49 Mitre Road SE1
 50 Mitre Road SE1
 51 Mitre Road SE1
 52 Mitre Road SE1
 53 Mitre Road SE1
 54 Mitre Road SE1
 55 Mitre Road SE1
 56 Mitre Road SE1
 57 Mitre Road SE1
 58 Mitre Road SE1
 59 Mitre Road SE1
 60 Mitre Road SE1
 61 Mitre Road SE1
 62 Mitre Road SE1
 63 Mitre Road SE1
 64 Mitre Road SE1
 56 Ufford Street SE1
 57 Ufford Street SE1
 58 Ufford Street SE1
 59 Ufford Street SE1
 1 Ufford Street SE1
 3 Ufford Street SE1
 2 Ufford Street SE1
 4 Ufford Street SE1
 5 Ufford Street SE1
 6 Ufford Street SE1
 7 Ufford Street SE1
 8 Ufford Street SE1
 9 Ufford Street SE1
 10 Ufford Street SE1
 11 Ufford Street SE1
 12 Ufford Street SE1
 13 Ufford Street SE1
 14 Ufford Street SE1
 15 Ufford Street SE1
 16 Ufford Street SE1
 17 Ufford Street SE1
 18 Ufford Street SE1
 19 Ufford Street SE1
 20 Ufford Street SE1
 22 Ufford Street SE1
 23 Ufford Street SE1
 24 Ufford Street SE1
 25 Ufford Street SE1
 26 Ufford Street SE1
 27 Ufford Street SE1
 28 Ufford Street S.E. 1
 29 Ufford Street SE1
 30 Ufford Street SE1
 10 Chaplin Close SE1
 11 Chaplin Close SE1
 12 Chaplin Close SE1
 13 Chaplin Close SE1
 14 Chaplin Close SE1
 15 Chaplin Close SE1
 16 Chaplin Close SE1
 17 Chaplin Close SE1
 18 Chaplin Close SE1
 Third Floor Flat 81 Blackfriars Road SE1 8HA
 Second Floor Flat 81 Blackfriars Road SE1 8HA
 Ground Floor Flat 81 Blackfriars Road SE1 8HA
 7 Ring Court The Cut SE1 8LB
 Ground Floor 74 Blackfriars Road SE1 8HA
 9 Ring Court The Cut SE1 8LB
 8 Ring Court The Cut SE1 8LB
 First Floor Flat 81 Blackfriars Road SE1 8HA
 41 The Cut London SE1 8LF
 3-11 The Cut London SE1 8JZ
 2 Burrows Mews London SE1 8LD
 2-6 Boundary Row London SE1 8HP
 1 The Cut London SE1 8JZ
 37 The Cut London SE1 8LF
 87 Blackfriars Road London SE1 8HA
 Company Wine Bar 53 The Cut SE1 8LF
 47 The Cut London SE1 8LF
 39 The Cut London SE1 8LF
 51 The Cut London SE1 8LF
 Flat C 33 The Cut SE1 8LF
 Third Floor Flat 77 Blackfriars Road SE1 8HA
 Ground Floor Flat 77 Blackfriars Road SE1 8HA
 First Floor Flat 1 The Cut SE1 8JZ
 Second Floor Flat 77 Blackfriars Road SE1 8HA
 First Floor Flat 77 Blackfriars Road SE1 8HA
 53c The Cut London SE1 8LF
 53b The Cut London SE1 8LF
 53a The Cut London SE1 8LF
 1 Burrows Mews London SE1 8LD
 Flat B 33 The Cut SE1 8LF
 Flat A 33 The Cut SE1 8LF
 Flat 38 Styles House SE1 8DF
 Flat 7 Theatre View Apartments SE1 8LJ
 Flat 6 Theatre View Apartments SE1 8LJ
 Flat 5 Theatre View Apartments SE1 8LJ
 Flat 8 Theatre View Apartments SE1 8LJ
 Flat 11 Theatre View Apartments SE1 8LJ
 Flat 10 Theatre View Apartments SE1 8LJ
 Flat 9 Theatre View Apartments SE1 8LJ
 Flat A 1c Burrows Mews SE1 8LD
 Flat D 1c Burrows Mews SE1 8LD
 Flat C 1c Burrows Mews SE1 8LD
 Flat 1 Theatre View Apartments SE1 8LJ
 Flat 4 Theatre View Apartments SE1 8LJ
 Flat 3 Theatre View Apartments SE1 8LJ
 Flat 2 Theatre View Apartments SE1 8LJ
 First Floor Front 82-83 Blackfriars Road SE1 8HA
 Third Floor 82-83 Blackfriars Road SE1 8HA
 Second Floor 82-83 Blackfriars Road SE1 8HA
 Ground Floor 82-83 Blackfriars Road SE1 8HA
 Flat 37 The Cut SE1 8LF
 Flat 6 6 Burrows Mews SE1 8LD
 2a Burrows Mews London SE1 8LD
 Flat 14 Theatre View Apartments SE1 8LJ
 Flat 13 Theatre View Apartments SE1 8LJ
 Flat 12 Theatre View Apartments SE1 8LJ
 5 Burrows Mews London SE1 8LD
 First Floor Rear 82-83 Blackfriars Road SE1 8HA
 Fourth Floor 82-83 Blackfriars Road SE1 8HA
 Basement 82-83 Blackfriars Road SE1 8HA
 Flat B 1c Burrows Mews SE1 8LD
 Flat C 35a The Cut SE1 8LF
 Flat D 35a The Cut SE1 8LF
 Flat 3 Garrett House SE1 8LD
 Flat 1 75-76 Blackfriars Road SE1 8HA
 Flat 4 75-76 Blackfriars Road SE1 8HA
 Flat 3 75-76 Blackfriars Road SE1 8HA
 Flat 2 75-76 Blackfriars Road SE1 8HA
 35b The Cut London SE1 8LF
 Ground Floor 85 Blackfriars Road SE1 8HA
 Basement 75-76 Blackfriars Road SE1 8HA
 School House Southwark College SE1 8LE
 Flat 2 Garrett House SE1 8LD
 Flat 1 Garrett House SE1 8LD
 Flat 4 Garrett House SE1 8LD
 Flat 1 86 Blackfriars Road SE1 8HA
 First Floor Second Floor And Third Floor Flat 74 Blackfriars Road SE1 8HA
 Flat 5 6 Burrows Mews SE1 8LD
 Flat 2 86 Blackfriars Road SE1 8HA

19 Chaplin Close SE1
20 Chaplin Close SE1
21 Chaplin Close SE1
22 Chaplin Close SE1
23 Chaplin Close SE1
24 Chaplin Close SE1
25 Chaplin Close SE1
26 Chaplin Close SE1
27 Chaplin Close SE1
28 Chaplin Close SE1
29 Chaplin Close SE1
30 Chaplin Close SE1
31 Chaplin Close SE1
32 Chaplin Close SE1
33 Chaplin Close SE1
34 Chaplin Close SE1
35 Chaplin Close SE1
36 Chaplin Close SE1
37 Chaplin Close SE1
37 Chaplin Close SE1
38 Chaplin Close SE1
42 The Cut SE1
44 The Cut SE1
46 The Cut SE1
48 The Cut SE1
40 The Cut SE1
42 The Cut SE1
38 The Cut SE1
36 The Cut SE1
21 Ufford Street London se18qd
Flat 10, Stopher House Webber Street SE1 ORE
41a The Cut London SE1 8LF
39a The Cut London SE1 8LF
51c The Cut London SE1 8LF
41b The Cut London SE1 8LF
45a The Cut London SE1 8LF
43b The Cut London SE1 8LF
43a The Cut London SE1 8LF
41c The Cut London SE1 8LF
St Andrews Vicarage Short Street SE1 8LJ
Flat 3 Milton House SE1 8LH
43c The Cut London SE1 8LF
49c The Cut London SE1 8LF
47c The Cut London SE1 8LF
45c The Cut London SE1 8LF
3 Ring Court The Cut SE1 8LB
2 Ring Court The Cut SE1 8LB
1 Ring Court The Cut SE1 8LB
4 Ring Court The Cut SE1 8LB
79-80 Blackfriars Road London SE1 8HA
6 Ring Court The Cut SE1 8LB
5 Ring Court The Cut SE1 8LB
47b The Cut London SE1 8LF
47a The Cut London SE1 8LF
45b The Cut London SE1 8LF
49a The Cut London SE1 8LF
51b The Cut London SE1 8LF
51a The Cut London SE1 8LF
49b The Cut London SE1 8LF
Flat 2 Milton House SE1 8LH
Flat 47 Styles House SE1 8DF
Flat 46 Styles House SE1 8DF
Flat 45 Styles House SE1 8DF
Flat 48 Styles House SE1 8DF
Flat 50 Styles House SE1 8DF
Flat 5 Styles House SE1 8DF
Flat 49 Styles House SE1 8DF
Flat 40 Styles House SE1 8DF
Flat 4 Styles House SE1 8DF
Flat 39 Styles House SE1 8DF
Flat 41 Styles House SE1 8DF
Flat 44 Styles House SE1 8DF
Flat 43 Styles House SE1 8DF
Flat 42 Styles House SE1 8DF
Flat 9 Styles House SE1 8DF
Flat 8 Styles House SE1 8DF
Flat 7 Styles House SE1 8DF
Flat 1 Milton House SE1 8LH
49 The Cut London SE1 8LF
Flat 5 86 Blackfriars Road SE1 8HA
Flat 4 86 Blackfriars Road SE1 8HA
Flat 3 86 Blackfriars Road SE1 8HA
Ground Floor 17 Short Street SE1 8LJ
1c Burrows Mews London SE1 8LD
Flat 5 75-76 Blackfriars Road SE1 8HA
Flat 1 6 Burrows Mews SE1 8LD
Flat 4 6 Burrows Mews SE1 8LD
Flat 3 6 Burrows Mews SE1 8LD
Flat 2 6 Burrows Mews SE1 8LD
Flat 20 Styles House SE1 8DF
Flat 2 Styles House SE1 8DF
Flat 19 Styles House SE1 8DF
Flat 21 Styles House SE1 8DF
Flat 24 Styles House SE1 8DF
Flat 23 Styles House SE1 8DF
Flat 22 Styles House SE1 8DF
Flat 14 Styles House SE1 8DF
Flat 13 Styles House SE1 8DF
Flat 12 Styles House SE1 8DF
Flat 15 Styles House SE1 8DF
Flat 18 Styles House SE1 8DF
Flat 17 Styles House SE1 8DF
Flat 16 Styles House SE1 8DF
Flat 33 Styles House SE1 8DF
Flat 32 Styles House SE1 8DF
Flat 31 Styles House SE1 8DF
Flat 34 Styles House SE1 8DF
Flat 37 Styles House SE1 8DF
Flat 36 Styles House SE1 8DF
Flat 35 Styles House SE1 8DF
Flat 27 Styles House SE1 8DF
Flat 26 Styles House SE1 8DF
Flat 25 Styles House SE1 8DF
Flat 28 Styles House SE1 8DF
Flat 30 Styles House SE1 8DF
Flat 3 Styles House SE1 8DF
Flat 29 Styles House SE1 8DF
Flat 11 Styles House SE1 8DF
First Floor 88-89 Blackfriars Road SE1 8HA
Studio Flat Ground Floor 77 Blackfriars Road SE1 8HA
92 Blackfriars Road London SE1 8HW
Second Floor 88-89 Blackfriars Road SE1 8HA
Ground Floor Flat 86 Blackfriars Road SE1 8HA
Fourth Floor 88-89 Blackfriars Road SE1 8HA
Third Floor 88-89 Blackfriars Road SE1 8HA
Ground Floor 19 Short Street SE1 8LJ
Part 2 35 The Cut SE1 8LF
Part 1 35 The Cut SE1 8LF
Part First Floor And Part Second Floor St Andrews Church Hall SE1 8LJ
Living Accommodation 72 Blackfriars Road SE1 8HA
Part Second Floor St Andrews Church Hall SE1 8LJ
Part First Floor St Andrews Church Hall SE1 8LJ
85 Blackfriars Road London SE1 8HA
90 Blackfriars Road London SE1 8HW
Flat 10 Styles House SE1 8DF
Flat 1 Styles House SE1 8DF
21 Short Street London SE1 8LJ
78 Blackfriars Road London SE1 8HF
25 The Cut London SE1 8LF
The Ring 72 Blackfriars Road SE1 8HA
33c The Cut London SE1 8LF
35a The Cut London SE1 8LF
Theatre View Short Street SE1 8LJ
5 Burrows Mews London SE18LD
By Email
53 The Cut London SE1 8LF
Styles House London SE18DF
36 Santley House Frazier Street SE17RD
19 Short Street Flat 3 SE1 8YH
37a The Cut London SE18LF
37a The Cut London SE1 8LF
8 Styles House Hatfield SE18DF
9 Guthrie Court Morley Street SE1 7QQ
18 Abbots Park Sw2 3qd
Tas Restaurant 33 The Cut SE1 8LF
27 Wootton Street London SE1 8Tg
94-95 Isabella Street London SE1 8dd
10 Overy House London SE1 8QX

Flat 53 Styles House SE1 8DF
Flat 52 Styles House SE1 8DF
Flat 51 Styles House SE1 8DF
Flat 54 Styles House SE1 8DF
Flat 6 Styles House SE1 8DF
Flat 56 Styles House SE1 8DF
Flat 55 Styles House SE1 8DF
Flat 8 84 Blackfriars Road SE1 8HA

Short Street London SE1 8LJ
19 Short Street London SE1 8LJ
204 Union Street London
229 Union Street Arch 24 SE1 0LR
The Laughing Gravy 154 Blackfriars Road Se1 8en
Theatre View Apartments 19 Short Street SE1 8LJ
25 Short Street London SE1 8LJ
Flat 7 Theatre View Apartments SE1 8LJ
19 Short Street London SE1 8LJ

Re-consultation: n/a

APPENDIX 2

Consultation responses received

Internal services

None

Statutory and non-statutory organisations

Metropolitan Police Service (Designing out Crime)
Natural England - London Region & South East Region
Thames Water - Development Planning

Neighbours and local groups

Flat 11 Theatre View Apartments SE1 8LJ
Flat 13 Theatre View Apartments SE1 8LJ
Flat 44 Styles House SE1 8DF
Flat 6 84 Blackfriars Road SE1 8HA
Flat 7 Theatre View Apartments SE1 8LJ
Flat 8 Theatre View Apartments SE1 8LJ
Short Street London SE1 8LJ
Styles House London SE18DF
Tas Restaurant 33 The Cut SE1 8LF
The Laughing Gravy 154 Blackfriars Road Se1 8en
Theatre View Apartments 19 Short Street SE1 8LJ
10 Overy House London SE1 8QX
18 Abbots Park Sw2 3qd
19 Short Street Flat 3 SE1 8YH
19 Short Street London SE1 8LJ
19 Short Street London SE1 8LJ
2 Ring Court The Cut SE1 8LB
204 Union Street London
21 Short Street London SE1 8LJ
21 Ufford Street London se18qd
229 Union Street Arch 24 SE1 0LR
25 Short Street London SE1 8LJ
27 Wootton Street London SE1 8Tg
3-11 The Cut London SE1 8JZ
33c The Cut London SE1 8LF
35a The Cut London SE1 8LF
35a The Cut London SE1 8LF
36 Santley House Frazier Street SE17RD
37a The Cut London SE1 8LF
37a The Cut London SE18LF
47a The Cut London SE1 8LF
5 Burrows Mews London SE1 8LD
5 Burrows Mews London SE1 8LD
53 The Cut London SE1 8LF
8 Styles House Hatfield SE18DF
85 Blackfriars Road London SE1 8HA
9 Guthrie Court Morley Street SE1 7QQ
94-95 Isabella Street London SE1 8dd