

Item No. 7.1	Classification: Open	Date: 3 September 2018	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 17/AP/4289 for: Full Planning Application Address: 33-38 RUSHWORTH STREET, LONDON, SE1 0RB 1-7 KING BENCH STREET SE1 Proposal: Part demolition of existing commercial buildings (Class B1 Business Use) and construction, behind part-retained existing facades, of a part 3, part 4 and part 5 storey building (plus plant enclosure) comprising 3,232m of Class B1 Office/Business floorspace and 1,026m of Class A1 / A3 / B1 / D1 / D2 Use floorspace (retail/restaurant/business/community/leisure use). Associated hard landscaping and public realm.		
Ward(s) or groups affected:	Borough and Bankside		
From:	Director of Planning		
Application Start Date 17/01/2018		Application Expiry Date 18/04/2018	
Earliest Decision Date 10/03/2018		PPA Date	

RECOMMENDATION

1. a) That the Planning Committee grant planning permission subject to conditions and the applicant entering into an appropriate legal agreement by no later than 20 December 2018.

b) In the event that the requirements of (a) are not met by 20 December 2018, the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 83.

BACKGROUND INFORMATION

Site location and description

2. The application relates to the building and plot located at 33-38 Rushworth Street, on the corner with King's Bench. The existing building occupies the entire plot and benefits from three street facing frontages; Rushworth Street to the west and King's Bench Street to the east and south. On the northern boundary the building sits immediately adjacent to Merrow House and Ripley House which are both Grade II listed buildings.

- 3. The existing building is currently in commercial use and is finished in an industrial/warehouse style typically found in the northern part of the borough. The building is finished in brick with large windows and four gable end bays. Whilst the building is two storeys in height, the ridge height of the gabled bays takes the total height of the existing building to an equivalent of three storeys.

Image – Site plan



- 4. The existing building occupies a central and prominent position within the King’s Bench Conservation Area and whilst the building itself is not listed it is considered to be an important heritage asset which makes a positive contribution to the conservation area.
- 5. The surrounding immediate area is characterised by narrow streets with buildings fronting directly onto the street and ranging in height from three to five storeys and there are existing consents for new buildings on Rushworth Street rising to six and eight storeys. Notable recent developments in the area include Newspaper House at 40 Rushworth Street which redeveloped a 20th Century industrial building in 2014 to provide a five storey building with commercial use at ground floor and new homes on all upper levels. Taller buildings are located on surrounding streets, particularly to the north and west closer to Blackfriars Road, Pocock Street and Great Suffolk Street. The area is of a mixed character with uses including offices, residential and commercial.

Details of proposal

- 6. Planning consent is sought for the partial demolition of the existing commercial

building and redevelopment incorporating the remaining facades to provide a part three/part four/part five storey building with basement. The proposed building would accommodate Class A1/A3/B1/D1/D2 floorspace at basement and ground floor level and Class B1 office floorspace on all upper levels. Up to 156 cycle parking spaces would be provided within the basement. In total it would provide 3232sqm of Class B1 office space and 1026sqm of flexible commercial floorspace.

Image – Demolition plan



7. The proposal would result in the demolition of the end bay fronting onto King's Bench Street opposite Newspaper House. This bay was a later addition to the building and is not considered to be of an equivalent quality to the remaining facades. The proposal would replace this bay with brickwork and glazing to form the main entrance to the offices, with the retained facades being fully restored. Internally the building will be fully reconfigured and extensions will be constructed from second floor to fourth floor level, set back behind the existing building facades and using materials such as metal and glass.

Planning history

8. A pre-application enquiry was submitted in 2016 under references 16/AP/0219 and 16/AP/0311. The pre-application discussions focused on a commercial led redevelopment of the site retaining the facades. The response to the pre-application enquiry concluded that redevelopment of the site to provide more and enhanced office space in this part of the Central Activities Zone would be welcome. The proposed scale and mass of the building was considered to be broadly acceptable subject to appropriate set backs at the upper floors and further detailed design considerations including improving the contextual relationship between the retained facade and the new building. Further advice was given that the final scheme design should not result in a substantial intrusion into the setting of the listed buildings and should minimise amenity impacts.

9. 07/AP/2938 Application type: Full Planning Application (FUL)
Demolition of existing two storey building and the erection of a part three, part five storey building comprising 2,375 sqm of B1 office floorspace, six two bed flats and two three bed flats
RE-SUBMISSION AGAINST 07-AP-0825
Decision date 20/03/2008 Decision: Refused (REF)
Reason(s) for refusal:
- The proposal is not in keeping with the sensitive urban context, is overbearing in its massing and offers poor street frontage and access. It is therefore considered that the development adversely impacts on the appearance of the site, the streetscape and the setting of the adjacent listed building, contrary to policies 3.12 (Quality in Design), 3.13 (Urban Design) and 3.18 (Setting of listed buildings, conservation areas and world heritage sites) of The Southwark Plan 2007 and Policy 4B.8 Designing in Context of the London Plan (Consolidated Feb 2008)
- The scheme has failed to adequately provide for standards of sustainable construction, in particular in relation to commitments to standards such as Code for Sustainable Homes, energy efficiency and the provision of on site renewable energy or reduction of carbon dioxide emissions through the provision of on-site renewable energy. In these regards the proposal is contrary to the Southwark Plan 2007 policies 3.3 Sustainability assessment, 3.4 Energy efficiency, 3.5 Renewable energy, 3.7 waste reduction, and 3.9 Water, and to the London Plan (Further Alterations Feb 2008) in particular policies 4A.4 Energy assessment and 4A.7 Renewable energy.
- Whilst the proposed development would replace the existing B Use Class floorspace, it fails to make provision for the equivalent replacement of Small Business Units. To this extent the scheme would be harmful in terms of not providing employment measures for a sustainable local economy and would be contrary to policy 1.5 (Small Business Units) of The Southwark Plan 2007, and therefore the proposal is considered in principle unacceptable in terms of this policy.
- The applicant has failed to offer acceptable financial contributions to Council in order to mitigate the effects from the development, such as the impact on services, public realm, open spaces, education, health and employment, in accordance with the Section 106 Planning Obligations Supplementary Planning Document 2007. It is therefore considered that the development is contrary to policies 1.1 (Access to Employment Opportunities) and 2.5 (Planning Obligations) of The Southwark Plan 2007.
- The applicant has failed to provide a detailed Transport Statement or Transport Assessment to enable assessment of the proposed development and the effects on the safety and efficiency of the highway network. No servicing statement has been provided detailing how or where servicing is going to take place and how and where deliveries will be made. Without this information the Council is unable to confirm that the proposed development would not impact on the highway network, as there is no provision within the development for offsite servicing. Due to the failure to provide a Transport Statement or Transport Assessment Council is unable to confirm that the proposed development would not adversely impact on the safety and efficiency of

the highway network and thus is unable to confirm compliance with Policy 5.2 (Transport Impact) of The Southwark Plan 2007.

The details of the proposed provision for cycle storage are inadequate in terms of layout or particular provision to ensure that secure weatherproof cycle storage would be made for both the commercial and residential uses. In particular due to the inadequate number of spaces for the commercial unit, the cycle storage provision is unacceptable and contrary to policy 5.3 (Walking and Cycling) of The Southwark Plan 2007.

There is inadequate information provided within the application in relation to determine whether adequate refuse and recyclables storage space has been incorporated into the development in particular in relation to the proposed commercial element of the scheme. In this respect the scheme is contrary to Policy 3.7 (Waste reduction) of the Southwark Plan.

The submitted Flood Risk Assessment does not adequately address impacts in terms of flooding including matters relating to the sequential test for example availability of other sites, and in terms of mitigation, in particular commitments to particular methods of mitigation and the particulars of the sustainable urban drainage system. To this extent the scheme may result in a harmful impact in terms of runoff and flooding, and as such it would be contrary to Policy 3.9 Water of the Southwark Plan 2007.

16/EQ/0219 Application type: Pre-Application Enquiry (ENQ)
Demolition of existing building and construction of new office building with ground floor/ lower ground floor retail.
Decision date 06/10/2016 Decision: Pre-application enquiry closed (EQC)

16/EQ/0311 Application type: Pre-Application Enquiry (ENQ)
Demolition of existing building and construction of new office building with ground floor/ lower ground floor retail.
Decision date 25/11/2016 Decision: Pre-application enquiry closed (EQC)

Planning history of adjoining sites

10-13 Rushworth Street

10. 13/AP/0943 Planning permission granted with legal agreement on 2 July 2013 for the Demolition of existing building and erection of a five storey plus basement building comprising of office floorspace (B1) on lower ground, ground and first floors with 9 (3x 1 beds, 4x 2 beds, 2x 3 beds) residential apartments above, amenity space, refuse/recycling stores, cycle storage and plant/equipment. This development has now been completed.

14-21 Rushworth Street

11. 15/AP/4000 – Planning permission granted with legal agreement on 31 March 2016

for the erection of a new part five, part six storey building to provide commercial floorspace at lower ground, ground and first floor level (Use Class B1) and 47 residential units (Use Class C3) on first to fifth floor levels, associated disabled car parking, cycle parking and landscaping. This development has not yet commenced.

12. 17/AP/1959 – Planning permission granted with legal agreement on 4 December 2017 for the construction of a new part five, part six storey building to provide commercial floorspace (Use Class B1), associated servicing, cycle parking and landscaping. This development has not yet commenced.

24-28 Rushworth Street and 61 Webber Street

13. 15/AP/2705 Planning application granted with legal agreement on 4 August 2016 for the Demolition of the existing building and erection of part six part eight storey (plus basement) mixed use building comprising 40 residential units (15 x 1 bed, 18 x 2 bed & 7 x 3 bed) (use class C3) and 2241 sqm (GIA) flexible commercial space (use class B1) and associated works. This development has not yet commenced

40 Rushworth Street

14. 13/AP/4404 Planning permission granted with legal agreement on 2 May 2014 for the construction of a ground plus three/four storey building to provide 1163 sqm (GEA) of Class B1 employment floorspace and nine residential units comprising 5 x 2 bedroom apartments and 4 x 3 bedroom maisonettes, shared courtyard and garden space, ancillary plant and equipment. This development is complete.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

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

Planning policy

16. The statutory development plans for the Borough comprise the National Planning Policy Framework 2018, London Plan 2016, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007).
17. The site is located within the:
 - Central Activities Zone (CAZ);
 - Bankside, Borough and London Bridge Opportunity Area;
 - Bankside and Borough District Town Centre;
 - Air Quality Management Area.
18. It has a Public Transport Accessibility Level (PTAL) of 6b where 1 is the lowest level and 6b the highest, indicating excellent access to public transport.
19. The following listed structures are close to the site:
 - Chadwick House and attached railings (Grade II);
 - Merrow House (Grade II);
 - Ripley House (Grade II);
 - The Drapers Almshouses, 1-5 Glasshill Street (Grade II).
20. The site is located within the King's Bench Conservation Area and the following conservation areas are nearby:
 - Valentine Place;
 - Liberty of the Mint;
 - Union Street.
21. This application should be determined in accordance with the development plan unless material considerations indicate otherwise; and the following national framework, regional and local policy and guidance are particularly relevant:

National Planning Policy Framework (the Framework)

22. Section 2: Achieving sustainable development
Section 6: Building a strong, competitive economy
Section 7: Ensuring the vitality of town centres
Section 9: Promoting sustainable transport
Section 11: Making effective use of land
Section 12: Achieving well designed places
Section 14: Meeting the challenge of climate change, flooding and coastal change
Section 16: Conserving and enhancing the historic environment

The London Plan 2016

23. Policy 2.5 Sub-regions
Policy 2.10 Central Activities Zone - strategic priorities

Policy 2.11 Central Activities Zone - strategic functions
Policy 2.13 Opportunity areas and intensification areas
Policy 4.1 Developing London's economy
Policy 4.2 Offices
Policy 4.3 Mixed use development and offices
Policy 4.12 Improving opportunities for all
Policy 5.1 Climate change mitigation
Policy 5.2 Minimising carbon dioxide emissions
Policy 5.3 Sustainable design and construction
Policy 5.12 Flood risk management
Policy 5.13 Sustainable drainage
Policy 5.15 Water use and supplies
Policy 5.18 Construction, excavation and demolition waste
Policy 5.21 Contaminated land
Policy 6.1 Strategic approach (Transport)
Policy 6.2 Providing public transport capacity and safeguarding land for transport
Policy 6.9 Cycling
Policy 6.10 Walking
Policy 6.11 Smoothing traffic flow and tackling congestion
Policy 6.12 Road network capacity
Policy 7.3 Secured by design
Policy 7.4 Local character
Policy 7.5 Public realm
Policy 7.6 Architecture
Policy 7.8 Heritage assets and archaeology
Policy 7.14 Improving air quality
Policy 7.15 Reducing and managing noise
Policy 8.2 Planning obligations
Policy 8.3 Community infrastructure levy

Greater London Authority Supplementary Guidance

24. Mayor of London: Sustainable design and construction (Saved SPG, 2006)
Mayor of London: Accessible London, achieving an inclusive environment (Saved SPG, 2004)
Mayor of London: Central Activities Zone (SPG, 2016)
Greater London Authority: Use of planning obligations in the funding of Crossrail (SPG, Updated 2016)
Mayor of London: Character and Context (SPG, 2014)

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 4 – Places for learning, enjoyment and healthy lifestyles
Strategic Policy 10 - Jobs and businesses
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 1.4 Employment Sites

Policy 1.7 Development within Town and Local Centres

Policy 2.5 Planning Obligations

Policy 3.1 Environmental Effects

Policy 3.2 Protection of Amenity

Policy 3.3 Sustainability Assessment

Policy 3.4 Energy Efficiency

Policy 3.6 Air Quality

Policy 3.7 Waste Reduction

Policy 3.9 Water

Policy 3.11 Efficient Use of Land

Policy 3.12 Quality in Design

Policy 3.13 Urban Design

Policy 3.14 Designing Out Crime

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

Policy 3.19 Archaeology

Policy 3.28 Biodiversity

Policy 3.31 Flood Defences

Policy 5.1 Locating Developments

Policy 5.2 Transport Impacts

Policy 5.3 Walking and Cycling

Policy 5.6 Car Parking

Southwark Supplementary Planning Documents

27. Bankside, Borough and London Bridge (Draft SPD, 2010)
Design and Access Statements (SPD, 2007)
King's Bench Conservation Area Appraisal 2010
Section 106 Planning Obligations and CIL (SPD, 2015)
Sustainability Assessment (SPD, 2009)
Sustainable Design and Construction (SPD, 2009)
Sustainable Transport (SPD, 2010)

New Southwark Plan

28. Work is under way to prepare a New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark plan and the 2011 Core Strategy. The Council

undertook consultation on the submission version of the NSP which concluded in February 2018. It is anticipated that the plan will be adopted in 2019 following an Examination in Public (EIP). As the NSP is in draft form, it can only be attributed limited weight at present.

Draft London Plan

29. Members should also be aware that the draft New London Plan was published on 30 November 2017 which has now been out to consultation. However, given that the plan process leading to the adoption of a new London Plan is only just beginning, this should be given very limited weight.

Principle of development

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

Land use

31. The application site is located within the Central Activities Zone (CAZ); Bankside, Borough and London Bridge Opportunity Area; and the Borough and Bankside District Town Centre.
32. 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.”
33. 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 (Strategic Policy 1). Additionally, Strategic Policy 10 aims to protect existing business space and support the provision of up to 500,000 sq. metres of additional business floorspace and 25,000 new jobs in the Bankside, Borough and London Bridge Opportunity Area. The policy also seeks to protect existing business floorspace in the wider CAZ and town centre locations where up to 30,000 sq. metres of new business space will be encouraged. The Southwark Plan requires existing employment space to be re-provided when sites are developed.
34. The existing building is under used and does not maximise the efficient use of this central location. The proposed scheme would deliver 4,258sqm of floorspace which represents an increase of 1,068sqm compared to the existing building, which is a significant uplift in employment floorspace and would enable the creation of up to 532 jobs. This is compliant with Southwark Plan and Core Strategy policies as well as fulfilling the principle of prioritising new development within the CAZ and Opportunity Areas. The principle of redevelopment is therefore strongly supported. The re-provision and enlargement of B1 office floorspace with high quality, modern and

flexible office accommodation is welcomed as a significant benefit of the scheme in accordance with adopted local and regional policy and meets the Core Strategy objective of increasing the number of jobs in Southwark.

35. The applicant seeks flexible use for the space at basement and ground floor level (1,026sqm) that could be used for retail (A1/A3), office (B1) or community/leisure uses (D1/D2). Class B1 use has already been determined to be an acceptable land use on this site. Use of this space for Class A1/A3 purposes is fully supported and would provide retail services for office staff and local residents in line with the requirements of Strategic Policy 3 of the Core Strategy. Whilst it is noted that the site is just outside of the Strategic Cultural Area, the potential provision of Class D1/D2 uses (such as gyms, health facilities or training establishments) are appropriate town centre uses which would be supported by Strategic Policy 3 of the Core Strategy.
36. The London Plan has an expectation that commercial development within the CAZ will include an element of housing however this policy should be interpreted flexibly and given the small size of the application site it is considered that the inclusion of housing would compromise the ability to maximise employment floorspace.
37. The proposed land use would provide a significant uplift in high quality office floorspace, improved employment opportunities and would offer active frontages at ground floor level. The proposal is therefore a welcome addition to the Bankside area and in terms of land use is fully supported.

Environmental impact assessment

38. It is considered that the proposed development does not constitute EIA development, based on a review of the scheme against both the EIA Regulations 2017 and the European Commission guidance. The scheme would not generate impacts of more than local significance which would warrant submission of an EIA.

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

Local environment

39. The immediate local context is typified by long and narrow street blocks fronting directly onto the pavement. The streets are very narrow, generally between six to eight metres in width, and enclosed by residential and industrial buildings which generally range in height from two to five storeys although recent consents have permitted buildings up to six and eight storeys tall. With the exception of the gardens to the Draper's Almshouses, there are no formal open spaces and this in turn contributes to the overall sense of a dense urban form with well defined streets. The maintenance of this established character is a factor which should be taken into account when assessing the overall impact of this development.

Daylight

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

41. 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.
42. The second method that can be used 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.
43. A third test, Average Daylight Factor (ADF), is generally used to measure lighting quality within new developments but it can also be used to assess the impact of a development on a consented scheme that has not yet been built.
44. The following properties have been assessed as part of the daylight and sunlight assessment;
 - Glasshill Studios
 - Newspaper House
 - Bench Apartments
 - 24-28 Rushworth Street
 - 14-21 Rushworth Street
 - Ripley House
 - Merrow House

Ripley House and Merrow House

45. These buildings sit to the north west of the proposed development and all of the windows that have been assessed for VSC would continue to meet the BRE requirements.

Glasshill Studios

46. Living accommodation in this building starts on the first floor and continues on all upper levels. 15 windows at this property have been assessed for VSC with 13 continuing to meet the BRE guidelines. Of the two windows that have losses beyond the BRE one window would have a VSC change from 0.7% to 0.07% which would not be noticeable given the existing very low level and the other window would have a residual VSC level of 18.75% which is considered to be an acceptable level within a dense urban environment.

Newspaper House

47. Newspaper House is located to the south of the development site and accommodates

commercial use on ground floor and residential use on all upper levels. A total of 30 windows have been assessed for VSC and of these 20 will continue to achieve levels of daylight that either meet or exceed the BRE guidelines. Those properties that would experience losses beyond the BRE would see VSC reductions in the range of 44% - 25% however in all cases, the residual VSC values would be at least 18.81% which is positive given the tight street pattern and the urban location.

Bench Apartments

48. This building is located to the west of the proposed development and a total of 50 windows have been assessed for VSC with 17 windows continuing to receive BRE compliant daylight. The remaining 33 windows would see VSC reductions of between 45% and 22% with residual VSC values of between 13.63% and 26.56%. It has been noted above that the area around the application site has a very tightly knit street pattern with narrow streets. The BRE allows different daylight and sunlight criteria to be used based on the requirements for daylighting in an area taking into account existing constraints. An important issue is whether an existing building is a good neighbour with appropriate separation distances from adjacent buildings/sites.
49. The BRE allows for a mirror image of an existing building to be taken in order to gauge what a reasonable VSC target for affected windows should be. The applicant has therefore taken a mirror image of Bench Apartments set to an equal height and distance away from the boundary. This 'mirror image' test determines that the reasonable target value for Bench Apartments would be 16.5% VSC.
50. Of the 33 windows that do not meet the BRE Guidelines, 22 would exceed the alternative target value of 16.5%. Overall this would equate to 39 windows meeting the alternative target value in line with the BRE guidelines. Those windows that do not meet the 16.5% target are all located at first floor level and would have VSC levels of between 13.63% and 15.95% which is slightly below the alternative target of 16.5% VSC by between 0.55% and 2.87%. On balance, the impacts on Bench Apartments are considered acceptable taking into account the specific local environment.

24-28 Rushworth Street

51. This building is located to the west/south west of the application site. The existing building is a three storey commercial property however there is a planning consent for a part six/part eight storey mixed use building. At the time of the Case Officer's site visit, the building was shrouded in scaffold and it was not clear if the planning permission was being implemented or if the building was being demolished.
52. As the scheme has permission but has not yet been built, the BRE allows analysis to be undertaken by average daylight factor (ADF). Assessing the impacts on an ADF basis, there would be 32 of 41 rooms that would meet the BRE guidance on suitable ADF levels (78%). Those rooms that would not meet the required ADF are located within deeply inset balconies.
53. Balconies and overhangs significantly reduce the light entering windows below them. This is a particular problem if the balcony is recessed as the windows cannot benefit from light at either side with the combined effect of the overhang and deep recess it may be difficult to see the sky from inside the room, and hence to receive any direct

skylight or sunlight at all. In these situations the BRE allows further tests to be undertaken with the balcony removed and if the results improve then it can be considered that the balcony is the main obstruction to daylight. In this instance, as the balcony is recessed and not projecting, the test can be undertaken at the façade of the building instead. In this scenario 40 of the 41 rooms would meet the required ADF level which is positive considering the narrow street pattern.

54. The Daylight Distribution test also demonstrates that 28 of the 41 rooms would meet the BRE guidance. It is therefore considered that the impact of the development on the approved schemes at 24-28 Rushworth Street, would be acceptable.

14-21 Rushworth Street

55. There was a previous planning permission on this site for a part five/part six storey mixed use commercial and residential building (15/AP/0400). This planning consent now sits alongside a new permission (17/AP/1959) for a wholly commercial scheme.
56. As such the site benefits from two consents, one for mixed use including residential and the latter which is wholly commercial. At present it is unclear which consent will be implemented therefore an assessment of the impacts on the residential scheme should be completed.
57. Given the fact that the development hasn't been built yet, it is considered appropriate to look at Average Daylight Factor (ADF).
58. When assessing the ADF a total of 26 of the 36 rooms would be compliant. As was the case with the previously assessed building at 24-28 Rushworth Street, many of the windows at 14-21 Rushworth Street would be set within deeply recessed balconies and when reassessing without these balconies in place the results show that 35 of the 36 would meet the recommended minimum values. The Daylight Distribution test also demonstrates that 31 of the 36 rooms would meet the BRE guidance. It is therefore considered that the impact of the development on the approved schemes at 14-21 Rushworth Street, would be acceptable.

Sunlight

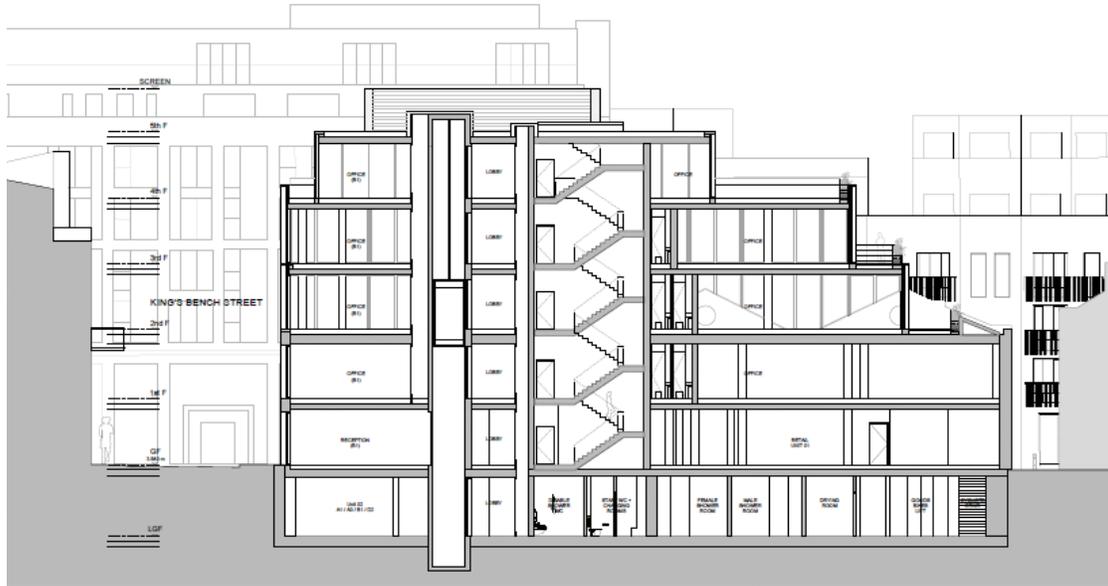
59. Only windows that face within 90 degrees of due south have been tested. This includes windows within Ripley House, Merrow House, Glasshill Studios and Bench Apartments. All windows assessed at Ripley House, Merrow House and Glasshill Studios pass the BRE sunlight tests.
60. Of the 48 windows assessed for sunlight at Bench Apartments, 42 would comply with the BRE guidelines and the remaining six would achieve sunlight values of between 22% and 23% which is only marginally below the BRE target of 25% and as such the impacts are considered to be acceptable.

Overlooking, outlook and privacy

61. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear.

62. At the closest points there would be a separation distance of approximately 11m between the proposed development and Newspaper House on King's Bench Street and approximately 10m between the development and Bench Apartments. Given that the scheme retains much of the façade and building line of the existing building, the proposed separation distances mimic the existing situation albeit that the building is increasing in height to accommodate new upper levels.

Image – Separation distances and height context



63. In conclusion, whilst the recommended separation distances would not be achieved, the shortfalls are considered to be very minor in nature and are acceptable in the context of the narrow street width typical of the immediate area and the existing situation with the current building. The separation distances being proposed are comparable to other recently approved schemes in the area including Newspaper House and the schemes on Rushworth Street, all of which approved buildings fronting directly onto the pavement. Officers are therefore satisfied that neither outlook nor privacy for adjacent occupiers would be compromised.

Disturbance

64. The use of the site for an increased quantum of commercial floorspace is not anticipated to result in any significant additional disturbance to residents. It is noted that the proposal includes roof terraces at levels immediately adjacent to Mellow House and Ripley House however these terraces step away from the common boundary and it is considered that conditions to control the hours of use of the terraces can adequately mitigate any potential harmful impacts.

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

65. It is not anticipated that there will be any conflict of use that would have any adverse

impact on occupiers of the proposed retail or office spaces.

Transport issues

66. Saved policy 5.1 of the Southwark Plan seeks to ensure that development is located near transport nodes or, where they are not, it must be demonstrated that sustainable transport options are available to site users and sustainable transport is promoted. In addition, saved policy 5.6 of the Southwark Plan requires development to minimise the number of car parking spaces provided and include justification for the amount of car parking sought taking into account the site Public Transport Accessibility Level (PTAL), the impact on overspill car parking, and the demand for parking within the controlled parking zones.

Public transport accessibility

67. The site is located within an area of excellent (6 – high) public transport accessibility with short walking distances to both Southwark Underground and Waterloo Station as well as lying in close proximity to Blackfriars Road and the many bus routes that use this artery.

Car Parking

68. Borough Controlled Parking Zone provides adequate parking control in this vicinity on weekdays from 08:30 to 18:30. There are some car club spaces in the vicinity of this development including one on Pocock Street and loading bays on the stretches of King's Bench Street/Rushworth Street flanking this development. The proposed development would be car free which is fully supported in addition to the development being excluded from those eligible for car parking permits in the surrounding CPZ.

Cycle Parking

69. There are a number of cycle docking stations close to this site, one of which is on the neighbouring Webber Street. The applicant has proposed 53 two-tier cycle racks and 50 lockers together containing 156 cycle parking spaces in the basement level, which would be accessed via a lift and stairs from the ground floor. The cycle parking level is significantly higher than the required 112 cycle parking spaces required by the London Plan and as such is considered to be policy compliant.

Servicing

70. Overall, the council's Transport Team have estimated that this development would produce around 29 and 35 two-way vehicle movements in the morning and evening peak hours respectively. It is also forecast that the existing office use of this building would have created 8 two-way vehicle movements in the morning or evening peak hours, meaning that that this development would generate 21 and 27 net additional two-way vehicle movements in the morning and evening peak hours, individually. The Transport Team consider that this would not have any noticeable adverse impact on the prevailing vehicle movements on the adjoining roads.
71. Servicing would take place via a loading bay accessed from Rushworth Street however this would require vehicles to either reverse into the loading bay or reverse

out of it onto the highway, neither of which is supported. Given the small scale of the development, the Councils Transport Team consider that a more appropriate servicing arrangement would be the provision of a serving lay-by in the location of the proposed internal loading bay and this will be secured by way of a condition requiring an amended plan as well as being secured as part of the S.278 Highway works. A Service Management Plan will also be required as part of the S106 Agreement in order to ensure adequate servicing provision as well as mitigation of any impacts.

Design and heritage

72. As previously noted, the application site sits within the King's Bench Conservation Area. The character of the King's Bench conservation area is one of narrow streets and pavements with building facades fronting directly onto the pavement. The King's Bench Conservation Area Appraisal notes that it is important that the integrity of this development pattern is retained and that any new buildings within the conservation area must observe the same building lines and set-backs as the historic street, and, similarly, the same plot width and rhythms of historic development.
73. The appraisal notes that opportunities for new development in the conservation area are limited; however, there may be opportunities for sensitive adaptation or restoration of the existing buildings. Though new design would need to be sympathetic to the existing characteristics of the area, modern design is not necessarily to be precluded. The success of contemporary design in conservation areas comes not from aping the style of the existing historic buildings, but in building on the unique townscape opportunities of density and height that the historic development pattern affords.

Image – Proposed King's Bench new facade



74. The proposed development stays true to this advice by retaining the important facades of the existing building and replacing the later addition with a contemporary interpretation of the gabled industrial building style. The proposed development would maintain and reinforce the existing building lines thereby securing the integrity of the historic development pattern.

75. The new additions to the building, notably the vertical extensions, would create a lightweight and modern addition to the building with metal and glazing offering clean lines and a pleasing contrast with the retained facades and adjacent new developments that employ brickwork as the primary material. The close rhythm and narrow vertical proportions of the well articulated extension, set behind the retained façade, is considered appropriate.

Image – Proposed Rushworth Street elevation



76. At four storeys in height, with a set-back fifth floor, the scale of the development is considered to be acceptable by virtue of its stepped profile and massing and likely to respond well to the emerging context on Rushworth Street as well as the newer buildings on King's Bench Street such as Newspaper House. The 5th floor has been set back from the main street frontages and well away from the listed mansion blocks to the north and this further reduces any impact on these heritage assets.

Image – Rushworth Street elevation



77. The proposed development is considered to be of a high standard of design which retains the historic façade of the existing building whilst providing a significant uplift in commercial floorspace by way of a sensitively designed extension. The height, scale and massing is considered to be contextually appropriate and would reinforce the historic pattern of development that characterises the King’s Bench Conservation Area.

Impact on trees

78. The proposed development includes roof terraces and the provision of three street trees. The roof terraces and trees will be secured by condition in order to secure further design detail as well as an appropriate species. No trees would be removed as a result of the proposed development.

Planning obligations (S.106 undertaking or agreement)

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

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

80. Following the adoption of Southwark’s Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

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

Planning Obligation	Mitigation	Applicant Position
Employment in the development	33 sustained jobs for unemployed Southwark Residents at the end phase, or meet any shortfall through the Employment in the End Use Shortfall Contribution. The maximum Employment in the End Use Shortfall Contribution is £141,900 (based on £4,300 per job).	Agreed
Transport - site specific	£139,680 towards the provision of bus countdown facilities at bus stops on Blackfriars Road; raised entry treatment at Rushworth Street junctions; improvements to the pedestrian route to the riverside and relocation of cycle store and lighting columns. Submit a scheme for the provision of 2 (two) disabled bays, 1 (one) of which must be equipped with an active electric vehicle charging point (EVCP).	Agreed
Cross Rail	£241,860	Agreed
Public realm	Works to resurface King's Bench Street including the pavement on the east side, provision of a loading bay and tree planting. The works will be required 'in kind' and will form part of the S.278 Agreement.	Agreed
Trees	Not specifically required unless highways issues prevent some of the proposed trees from being planted in which case a contribution will be sought - £5,000 per tree.	Agreed
Total	£431,100	Agreed
Admin charge (2%)	£8,622	Agreed

82. The contributions and in lieu works detailed in the table above will also be secured under the S106 Agreement alongside amendments to the Traffic Management Order and the following S.278 Highways work:

- The retaining walls of the basement are in close proximity to the public

highway and as such detailed design and method statements (AIP) for foundations and basement structures retaining the highway (temporary and permanent) in accordance with BD 2/12 'Technical Approval of Highway Structures' should be submitted and approved by the Highway Authority prior to construction.

- Repaving of the footway fronting the proposed development including new kerbing on Rushworth Street and King's Bench Street using materials in accordance with Southwark's Streetscape Design Manual Heritage palette – i.e. Yorkstone slabs and 300mm wide silver grey granite kerbs.
- Construction of the crossover for the loading bay to SSDM Type 1 detail.
- All utility covers within affected footway areas to be changed to recessed type covers.
- Promote TRO to amend parking arrangement on Rushworth Street. As well as works to include road marking and signage.
- Repair any damages to the highway within the vicinity of the development resulting from construction vehicles.
- Creation of an inset loading bay at the western boundary of this site on Rushworth Street and the reconstruction of the footways adjoining this site on Rushworth Street and King's Bench Street plus the relocation of the badly-positioned lighting columns on King's Bench Street.
- Works to resurface King's Bench Street including the pavement on the east side, provision of a loading bay and tree planting.

83. In the event that an agreement has not been completed by 20 December 2018, the Committee is asked to authorise the Director of Planning to refuse permission, if appropriate, for the following reason:

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

Community Infrastructure Levy

84. S143 of the Localism Act 2011 states that any financial sum that an authority has received, will, or could receive in the payment of CIL is a material "local financial consideration" in planning decisions. The requirement for Mayoral and Southwark CIL is a material consideration. However, the weight to be attached to a local finance consideration remains a matter for the decision-maker.
85. Mayoral CIL is to be used for strategic transport improvements in London, primarily Crossrail. The levy is applied to all developments at a rate of £35 (plus indexation) per square metre in Southwark. Southwark CIL in this location has a rate of £125 for retail and £0 for office. SCIL is to be used for infrastructure that supports growth with a Southwark commitment to spend at least 25% locally. The proposed development would generate the following estimated Mayoral and Southwark CIL contributions:

Mayoral CIL - £96,580.85
Southwark CIL - £155,981.31

86. The final CIL and Cross Rail figures will be determined prior to completion of the S106 Agreement based on the detailed CIL liability information that will be submitted. The applicant can offset the Mayoral CIL payment against the Cross Rail contribution.

Sustainable development implications

Carbon reduction

87. The Energy Strategy demonstrates how the energy hierarchy has been applied to the proposed development in order to achieve the carbon reduction targets set out in Strategic Policy 13 of the Core Strategy and the London Plan. The Core Strategy and the London Plan also state that there is a presumption that all major development proposals will seek to reduce carbon dioxide emissions by at least 20% through the use of on-site renewable energy generation wherever feasible. In addition, the London Plan expects developments to achieve a reduction in carbon dioxide emissions of 35% over Part L of the 2013 Building Regulations.
88. The proposed development will incorporate Air Source Heat Pump technology alongside a range of Be Lean, Be Clean, Be Green principles that result in an overall carbon reduction of 36.7% over Part L of the 2013 Building Regulations which is fully compliant with the London Plan.

BREEAM

89. The new building will be required to meet BREEAM 'Excellent' and a BREEAM pre-assessment has been submitted with the application demonstrating that this category is achievable for all floorspace that would be in B1 use. Should the flexible unit on the ground floor be used for retail uses then this unit would achieve 'Very Good'. Attaining BREEAM 'Excellent' for the overall development will be a conditioned requirement of any consent issued.

Other matters

Air quality and noise

90. A flexible use is sought for the ground floor and basement meaning that the end user is not yet defined. As such the space could be used as a retail unit, restaurant, office space or a Class D1/D2 use which could include a gym, training establishment or health facility. As such, the Councils Environmental Protection Team have recommended a series of conditions aimed at protecting amenity for adjacent occupiers in order to minimise disturbance from noise and odours. The relevant conditions will be imposed on any consent issued and will need to be satisfied prior to any development taking place.

Archaeology

91. The site is not within an Archaeological Priority Zone, and the proposed new build is of limited below ground impact. In this instance the archaeological resource would not be

compromised by these works. Therefore no further archaeological assessment, fieldwork or conditions are required in consideration of this application.

Flood risk

92. The site is located in Flood Zone 3 which is defined as having a 'high probability' of river and sea flooding and accordingly the applicant has submitted a Flood Risk Assessment. The Environment Agency were consulted on the application and have recommended several conditions that should be attached to any consent issued alongside conditions that have been recommended by the Councils own Flood and Drainage Team.

Conclusion on planning issues

93. The redevelopment of this site is welcomed and it would provide additional high quality commercial floorspace that would bring with it the potential to create up to 528 jobs. This fully complies with the development plan and reinforces the role of the CAZ in supporting London's economy. The retention of the high quality facades which are a key heritage asset within the surrounding conservation area is also welcomed.
94. The proposed development would exhibit high standards of design and materiality and is set to an appropriate height, scale and massing in the context of the immediate area and the adjacent emerging developments. The high quality of design together with the retention of the historic facades would serve to preserve the character of the King's Bench Conservation Area and the setting of the adjacent listed buildings at Merrow House and Ripley House.
95. The impacts of the scheme in relation to daylight/sunlight and privacy are considered to be acceptable on balance particularly in the context of the historic street pattern, the retention of the existing facades and the pattern of new development taking place on Rushworth Street and completed developments on King's Bench Street such as Newspaper House which reinforce the tight knit nature of the conservation area.
96. It is therefore recommended that planning permission be granted, subject to conditions as set out in the attached draft decision notice and the completion of a s106 legal agreement on terms as set out above.

Community impact statement

97. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act: -
- a) The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
 - b) The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
 - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connect to that characteristic
 - Take steps to meets the needs of persons who share a relevant protected

- characteristic that are different from the needs of persons who do not share it
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low

c) The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

98. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
99. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.
100. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
101. The applicant has submitted a Statement of Community Involvement that outlines the various consultation methods and events that were undertaken to locally publicise the proposed development including invitation flyers, invitation emails and public exhibitions held on 22 and 23 September 2017.

Consultations

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

Consultation replies

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

Summary of consultation responses

Environment Agency

104. No objection subject to conditions regarding groundwater contamination, remediation and Sustainable Urban Drainage Systems.
Response - Noted and agreed. The relevant conditions will be attached to any consent issued.

Historic England

105. Concerns regarding the demolition works to the existing building and that this will cause harm to the significance of local heritage assets and the conservation area.
Response – The majority of the building will be retained and only the later addition will be demolished. The high quality of design together with the retention of the historic facades would serve to preserve the character of the King’s Bench Conservation Area and the setting of the adjacent listed buildings at Merrow House and Ripley House.

London Fire Brigade

106. No objections.
Response - Noted.

Metropolitan Police

107. No objection, the development should be required to achieve Secured by Design certification.
Response - Noted and agreed, the relevant condition will be attached to any consent issued.

Natural England

108. No objections
Response - Noted.

Thames Water

109. No objection subject to conditions regarding piling.
Response - Noted.

Transport for London

110. No objections.
Response - Noted.

111. Following neighbour consultation, 43 letters of objection have been received including a Heritage Report by KM Heritage Consultants. The main points of objection have been summarised and addressed below.

112. Objection - The proposed development is unacceptable in terms of its design and would not fit in with the Conservation Area.
Response – The proposed redevelopment retains the important, historic façade whilst extending the existing building with a newly built façade and vertical extensions which are considered to be a high standard of design that would enhance the setting of the conservation area.

113. Objection - The consultation undertaken for the proposed development has been inadequate.
Response – The applicant undertook consultation prior to submission of the application and the council undertook statutory consultation as part of the planning application by way of neighbour letters, site notices and press notices.

114. Objection - The existing building is pleasant and makes a positive contribution to the Conservation Area. The proposed building will result in the loss of this building and would not be benefit to the area.
Response – The proposal would bring increased employment floorspace and jobs to the area with public realm enhancements as well as the retention of the existing building with the exception of the later addition which would be replaced with a high quality brickwork and glazing façade.

115. Objection - The existing building houses community scale businesses and social projects and these will be lost in order to provide more office space which is not what the area needs.
Response – The application site lies within the Central Activities Zone and the re-provision and enlargement of B1 office floorspace with high quality, modern and flexible office accommodation is welcomed as a significant benefit of the scheme in accordance with adopted local and regional policy and meets the Core Strategy objective of increasing the number of jobs in Southwark.
116. Objection - Demolition of the existing building should not be supported and its loss would have an adverse impact on the Conservation Area.
Response – Only the later addition to the existing building is being demolished and the original gable and bay facades on King’s Bench Street and Rushworth Street are being retained and restored.
117. Objection - The proposed development is contrary to the Southwark Plan, which includes a general presumption in favour of protecting those buildings that support the character and appearance of Conversation Areas.
Response – The proposal is compliant with The Southwark Plan and the King’s Bench Conservation Area Appraisal as it protects a building which is considered to make a positive contribution to the conservation area.
118. Objection - The proposed building is excessive in scale, height and massing and would dominate the surrounding streets and neighbouring buildings.
Response - The height, scale and massing is considered to be contextually appropriate and would reinforce the historic pattern of development that characterises the King’s Bench Conservation Area.
119. Objection - The development would have an unacceptable impact on neighbouring properties daylight/sunlight, privacy and overlooking.
Response - The impacts of the scheme in relation to daylight/sunlight and privacy are considered to be acceptable on balance particularly in the context of the historic street pattern, the retention of the existing facades and the pattern of new development taking place on Rushworth Street and completed developments on King’s Bench Street such as Newspaper House which reinforce the tight knit nature of the conservation area. These issues are considered in more detail in the *‘Impact of proposed development on amenity of adjoining occupiers and surrounding area’* section of the main report.
120. Objection - Noise levels would increase and local residents would be subjected to increased disturbance.
Response - A flexible use is sought for the ground floor and basement meaning that the end user is not yet defined. As such the space could be used as a retail unit, restaurant, office space or a Class D1/D2 use which could include a gym, training establishment or health facility. As such, the Councils Environmental Protection Team have recommended a series of conditions aimed at protecting amenity for adjacent occupiers in order to minimise disturbance from noise and odours. The relevant conditions will be imposed on any consent issued and will need to be satisfied prior to any development taking place.

121. Objection - The daylight and sunlight report submitted by GL Hearn is flawed and should not be relied upon. The BRE guidance makes it clear that the use of the MMS is appropriate only in order to ensure that a proposed development does not affect the development of adjoining land and this is plainly not the context in which it has been used in this case as News paper House is already developed.
Response – Officers have reviewed the conclusions of the Daylight and Sunlight Report and have considered the individual results when assessing the application. Furthermore, officers are satisfied that the Mirror Massing test has been employed in an appropriate way in line with the BRE guidance.
122. Objection - There are technical deficiencies with the application. It should never have been validated as there is not heritage assessment provided. This is in breach of the council's own validation requirements and para 128 of NPPF which requires applicants to describe the significance of any heritage assets. The DAS fails to address this as does the planning statement.
Response – Heritage impacts have been dealt with fully in the Design and Access Statement and as such the application is not considered to be deficient and a stand alone Heritage Statement would not be required as the matter is dealt with in the submission documents.
123. Objection - The site notices posted at the site did not contain the date the consultation period commenced or expired.
Response – Site notices were posted at the site as well as neighbour letters and press notices. As such the council has met statutory obligations with regards to neighbour consultations.
124. Objection - The planned building will destroy an area worth protecting in terms of architecture, scale and local character and that the plan runs counter to the aim of the King's Bench Conservation Area.
Response - The proposed development will retain the important facades and will preserve the character of the conservation area. The scale and massing of the proposed building is contextually appropriate given the existing and emerging schemes.
125. Objection - The proposed building is effectively six storeys and would be out of scale with the urban block running along the whole street that has a two and three storey character and also runs counter to the consistency of materials, both features forming the heart of the conservation area.
Response – The proposed building is five storeys with the fifth storey being set back and a plant enclosure on the roof. The contextual elevations show that this height would be consistent with other schemes on Rushworth street and only marginally taller than the newer developments on King's Bench Street.
126. Objection - The proposed public realm improvements are outside the ownership of the applicant and do not represent a meaningful public benefit that could in any way compensate for the harm caused by demolishing the existing building and constructing the proposed building.
Response – The public realm improvement works, whilst outside of the red line, can be secured by a S.78 agreement and would improve the appearance of King's Bench Street and Rushworth Street.

127. Objection - The granting of planning permission to build new office developments to the west along Rushworth Street is irrelevant as it falls outside the CA and should not set a precedent for the new proposed development within it.
Response – Whilst the approved developments on Rushworth Street sit outside of the conservation area they do form part of the immediate context of the application site and as such their scale, massing and appearance is relevant.
128. Objection - This application is objectionable because it exacerbates the social cleansing that has blighted the area in recent times.
Response – The application will replace commercial space with an increase quantum of commercial space, offering more employment opportunities.
129. Objection - Local infrastructure is not sufficient to cope with such a large development.
Response – The applicant will have to pay the community infrastructure levy towards infrastructure improvement within the local area. A scheme of this size is not anticipated to have significant impacts on local infrastructure.
130. Objection - The proposed development does not propose any ecological benefits and would have an adverse impact on ecology and biodiversity.
Response – This scheme would have a neutral impact on ecology and biodiversity as there is no ecological/biodiverse value in the existing building. As part of the proposed scheme, a condition has been imposed to secure the provision of three House Sparrow terraces
131. Objection - The proposal disregards the need for more social housing in the area.
Response - The London Plan has an expectation that commercial development within the CAZ will include an element of housing, however this policy should be interpreted flexibly and given the small size of the application site it is considered that the inclusion of housing would compromise the ability to maximise employment floorspace.
132. Objection - The sewerage system supporting this part of Blackfriars cannot cope. The existing fatberg at the junction of Webber Street and Blackfriars Road is extensive and has been directly caused by the onset of development approved by the council.
Response – Thames Water have been consulted on the application and have raised no objections to the proposal subject to conditions.
133. Objection - The proposed demolition and construction works could affect local businesses.
Response – Whilst demolition and construction can cause a degree of disturbance, it is considered that these temporary impacts can be adequately mitigated by condition.
134. Objection - The King's Bench Street pavements are very narrow and cannot accommodate retail or office entrances.
Response – Narrow pavements and streets are a key feature of the conservation area and should be retained as set out in the Conservation Area Appraisal
135. Objection - The proposed materials do not relate to the historic context of the conservation area and the design is simply a glass box above a retained facade which is crude and not of a sufficient quality for the location.
Response - The new additions to the building, notably the vertical extensions, would

create a lightweight and modern addition to the building with metal and glazing offering clean lines and a pleasing contrast with the retained facades and adjacent new developments that employ brickwork as the primary material.

136. Objection - Any development approved on this site should come with an obligation to replace the remaining pavements on Rushworth Street especially outside the student accommodation, Academy costumes and Ripley/Merrow House with York stone slabs to match those outside recent developments. The slabs which have not been replaced are eyesores and in many cases loose and dangerous.

Response – This will be secured by way of a S.278 Highways Agreement.

137. Objection - The demolition of the 1916 Newspaper House and the adaptation of 38-40 Glasshill Street have already destroyed some characteristic historic buildings and 33-38 Rushworth Street is the best example and should be reserved intact.

Response - The proposed development is considered to be of a high standard of design which retains the historic façade of the existing building.

138. Objection - The 2010 decision of Southwark Council to extend the King's Bench Conservation Area included the area where the site is situated and specifically referenced 33-38 Rushworth Street, among other buildings, as a key unlisted building which contributes positively to the character and appearance of the Conservation Area. The loss of this building should therefore be resisted as it does not comply with the Council planning policies or the Conservation Area Appraisal.

Response – As set out above, the proposed development is considered to be of a high standard of design which retains the historic façade of the existing building.

139. Objection - The applicant has provided no information about the negative acoustic impact of the development.

Response - A flexible use is sought for the ground floor and basement meaning that the end user is not yet defined. As such the space could be used as a retail unit, restaurant, office space or a Class D1/D2 use which could include a gym, training establishment or health facility. As such, the council's Environmental Protection Team have recommended a series of conditions aimed at protecting amenity for adjacent occupiers in order to minimise disturbance from noise and odours. The relevant conditions will be imposed on any consent issued and will need to be satisfied prior to any development taking place.

Human rights implications

140. 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.

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

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1445-33 Application file: 17/AP/4289 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 5365 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Human Rights Considerations

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Terence McLellan, Team Leader Planning	
Version	Final	
Dated	15 August 2018	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance & Governance	No	No
Strategic Director, Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		20 August 2018

APPENDIX 1

Consultation undertaken

Site notice date: 06/02/2018

Press notice date: 15/02/2018

Case officer site visit date: n/a

Neighbour consultation letters sent: 08/02/2018

Internal services consulted:

Building Control
Ecology Officer
Economic Development Team
Flood and Drainage Team
HIGHWAY LICENSING
Highway Development Management
Housing Regeneration Initiatives
Waste Management

Statutory and non-statutory organisations consulted:

EDF Energy
Environment Agency
Greater London Authority
Historic England
London Fire & Emergency Planning Authority
London Underground Limited
Metropolitan Police Service (Designing out Crime)
Natural England - London Region & South East Region
Network Rail (Planning)
Thames Water - Development Planning
Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

Flat 8 Newspaper House SE1 0RB
Rushworth Street 40 Southwark/ London SE10RB
Flat 10, Bench Apartments 22 Kings Bench St SE1 0QX
Shardeloes Road 50d New Cross/ London SE146SL
Flat 8 115 Brandon Street SE17 1AL
8 Ripley House London SE1 0RA
Flat 7 Newspaper House 40 Rushworth Street SE1 0RB
9 Newspaper House 40 Rushworth Street se1 0rb

Flat 45 Stopher House SE1 0SE
Flat 46 Stopher House SE1 0SE
Flat 41 Stopher House SE1 0SE
Flat 42 Stopher House SE1 0SE
Flat 43 Stopher House SE1 0SE
Flat 50 Stopher House SE1 0SE
Flat 51 Stopher House SE1 0SE
Flat 52 Stopher House SE1 0SE

6, Eliza House 38-40 Glasshill Street SE10QR
Flat 5 22 King'S Bench Street SE1 0QX
Flat 6, Newspaper House 40 Rushworth Street SE1 0RB
Raleigh Rotherhithe SE165GB
Flat 5 22 King'S Bench Street SE1 0QX
11 Bench Apts 22 King'S Bench St SE1 0QX
Flat 11 Bench Apartments 22 Kings Bench Street SE1 0QX
Bridge Cottage Bridge Road SO41 9BZ
8 Bench Apartments 22 King'S Bench Street SE1 0QX
50, Hartfield Crescent Wimbledon SW19 3SD
42 Mill Road Epsom KT174AR
70 Golden Avenue W.Sussex BN161QU
Flat 12 Bench Apartments 22 Kings Bench Street SE10QX
Flat 1, Newspaper House 40 Rushworth Street Se1 Orb
Flat 1, Newspaper House 40 Rushworth Street Se1 Orb
Apartment 1 10 Rushworth Street SE1 0RB
Newspaper House 40 Rushworth Street SE1 0RB
Glasshill Studios Kings Bench Street SE1 0QX
Apartment 9 40 Rushworth Street se1 Orb
Flat 4 59 Webber Street SE1 0RD
Flat 5 59 Webber Street SE1 0RD
Flat 6 59 Webber Street SE1 0RD
Flat 1 59 Webber Street SE1 0RD
Flat 2 59 Webber Street SE1 0RD
Flat 3 59 Webber Street SE1 0RD
Flat 10 59 Webber Street SE1 0RD
Flat 11 59 Webber Street SE1 0RD
Flat 12 59 Webber Street SE1 0RD
Flat 7 59 Webber Street SE1 0RD
Flat 8 59 Webber Street SE1 0RD
Flat 9 59 Webber Street SE1 0RD
94 Webber Street London SE1 0QN
Friars Primary School Webber Street SE1 0RF
Unit 9 33 Rushworth Street SE1 0RB
Unit 12 33 Rushworth Street SE1 0RB
Flat 8 Clandon Buildings SE1 0SD
Flat 9 Clandon Buildings SE1 0SD
Flat 16 Stopher House SE1 0SE
Unit 11 33 Rushworth Street SE1 0RB
Unit 7 33 Rushworth Street SE1 0RB
35-37 Rushworth Street London SE1 0RB
1-3 Kings Bench Street London SE1 0QX
Unit 17 33 Rushworth Street SE1 0RB
Flat 6 Stopher House SE1 0RE
Flat 7 Stopher House SE1 0RE
Flat 8 Stopher House SE1 0RE
Flat 3 Stopher House SE1 0RE
Flat 4 Stopher House SE1 0RE
Flat 5 Stopher House SE1 0RE
Flat 12 Stopher House SE1 0RE
Flat 13 Stopher House SE1 0RE
Flat 14 Stopher House SE1 0RE
Flat 9 Stopher House SE1 0RE
Flat 10 Stopher House SE1 0RE
Flat 11 Stopher House SE1 0RE
Flat 2 Stopher House SE1 0RE
Flat 16 59 Webber Street SE1 0RD
Flat 17 59 Webber Street SE1 0RD
Flat 18 59 Webber Street SE1 0RD
Flat 12a 59 Webber Street SE1 0RD
Flat 12b 59 Webber Street SE1 0RD
Flat 15 59 Webber Street SE1 0RD
Flat 22 59 Webber Street SE1 0RD
St Alphege Church Kings Bench Street SE1 0QX
50 Rushworth Street London SE1 0RB
Flat 19 59 Webber Street SE1 0RD
Flat 20 59 Webber Street SE1 0RD
Flat 21 59 Webber Street SE1 0RD
Flat 10 Merrow House SE1 0QZ
Flat 11 Merrow House SE1 0QZ
Flat 47 Stopher House SE1 0SE
Flat 48 Stopher House SE1 0SE
Flat 49 Stopher House SE1 0SE
Flat 3 Newspaper House SE1 0RB
Flat 22 Patrick Court SE1 0GB
Flat 23 Patrick Court SE1 0GB
Flat 24 Patrick Court SE1 0GB
Flat 19 Patrick Court SE1 0GB
Flat 20 Patrick Court SE1 0GB
Flat 21 Patrick Court SE1 0GB
Flat 28 Patrick Court SE1 0GB
Flat 29 Patrick Court SE1 0GB
Flat 30 Patrick Court SE1 0GB
Flat 25 Patrick Court SE1 0GB
Flat 26 Patrick Court SE1 0GB
Flat 27 Patrick Court SE1 0GB
Flat 18 Patrick Court SE1 0GB
Flat 9 Patrick Court SE1 0GB
Flat 10 Patrick Court SE1 0GB
Flat 11 Patrick Court SE1 0GB
Flat 6 Patrick Court SE1 0GB
Flat 7 Patrick Court SE1 0GB
Flat 8 Patrick Court SE1 0GB
Flat 15 Patrick Court SE1 0GB
Flat 16 Patrick Court SE1 0GB
Flat 17 Patrick Court SE1 0GB
Flat 12 Patrick Court SE1 0GB
Flat 13 Patrick Court SE1 0GB
Flat 14 Patrick Court SE1 0GB
Flat 47 Patrick Court SE1 0GB
Flat 48 Patrick Court SE1 0GB
Flat 49 Patrick Court SE1 0GB
Flat 44 Patrick Court SE1 0GB
Flat 45 Patrick Court SE1 0GB
Flat 46 Patrick Court SE1 0GB
Flat 53 Patrick Court SE1 0GB
Flat 54 Patrick Court SE1 0GB
Flat 55 Patrick Court SE1 0GB
Flat 50 Patrick Court SE1 0GB
Flat 51 Patrick Court SE1 0GB
Flat 52 Patrick Court SE1 0GB
Flat 43 Patrick Court SE1 0GB
Flat 34 Patrick Court SE1 0GB
Flat 35 Patrick Court SE1 0GB
Flat 36 Patrick Court SE1 0GB
Flat 31 Patrick Court SE1 0GB
Flat 32 Patrick Court SE1 0GB
Flat 33 Patrick Court SE1 0GB
Flat 40 Patrick Court SE1 0GB
Flat 41 Patrick Court SE1 0GB
Flat 42 Patrick Court SE1 0GB
Flat 37 Patrick Court SE1 0GB
Flat 38 Patrick Court SE1 0GB
Flat 39 Patrick Court SE1 0GB
Flat 1 94 Webber Street SE1 0QN
Flat 2 94 Webber Street SE1 0QN
1 Bench Apartments 22 Kings Bench Street SE1 0QX
2 Bench Apartments 22 Kings Bench Street SE1 0QX
Flat 3 94 Webber Street SE1 0QN
Flat 4 94 Webber Street SE1 0QN
Friars Court Rushworth Street SE1 0RB
Unit 10 33 Rushworth Street SE1 0RB
Unit 13 33 Rushworth Street SE1 0RB
Unit 19 33 Rushworth Street SE1 0RB
7a Kings Bench Street London SE1 0QX
7b Kings Bench Street London SE1 0QX
Middle Floor Flat Alphege House SE1 0BJ
Flat 14 59 Webber Street SE1 0RD
Unit 20 33 Rushworth Street SE1 0RB
Unit 22 33 Rushworth Street SE1 0RB

Flat 12 Merrow House SE1 0QZ
5 Kings Bench Street London SE1 0QX
Flat 1 Merrow House SE1 0QZ
Flat 5 Merrow House SE1 0QZ
Flat 6 Merrow House SE1 0QZ
Flat 7 Merrow House SE1 0QZ
Flat 2 Merrow House SE1 0QZ
Flat 3 Merrow House SE1 0QZ
Flat 4 Merrow House SE1 0QZ
46 Rushworth Street London SE1 0QN
Flat 7 Newspaper House SE1 0RB
Flat 9 Newspaper House SE1 0RB
Flat 4 Newspaper House SE1 0RB
Flat 5 Newspaper House SE1 0RB
Flat 6 Newspaper House SE1 0RB
Excluding Part Ground And Part First Floor 1 Rushworth Street SE1 0RB
Flat 1 96 Webber Street SE1 0QN
Flat 2 96 Webber Street SE1 0QN
Unit A Newspaper House SE1 0RB
Unit B Newspaper House SE1 0RB
Part Ground And Part First Floor 1 Rushworth Street SE1 0RB
Flat 10 Clandon Buildings SE1 0SD
Flat 11 Clandon Buildings SE1 0SD
Flat 12 Clandon Buildings SE1 0SD
Flat 9 Ripley House SE1 0RA
Flat 1 Stopher House SE1 0RE
Flat 1 Clandon Buildings SE1 0SD
Flat 5 Clandon Buildings SE1 0SD
Flat 6 Clandon Buildings SE1 0SD
Flat 7 Clandon Buildings SE1 0SD
Flat 2 Clandon Buildings SE1 0SD
Flat 3 Clandon Buildings SE1 0SD
Flat 4 Clandon Buildings SE1 0SD
Flat 8 Ripley House SE1 0RA
Flat 10 Ripley House SE1 0RA
Flat 11 Ripley House SE1 0RA
Flat 12 Ripley House SE1 0RA
Flat 8 Merrow House SE1 0QZ
Flat 9 Merrow House SE1 0QZ
Flat 1 Ripley House SE1 0RA
Flat 5 Ripley House SE1 0RA
Flat 6 Ripley House SE1 0RA
Flat 7 Ripley House SE1 0RA
Flat 2 Ripley House SE1 0RA
Flat 3 Ripley House SE1 0RA
Flat 4 Ripley House SE1 0RA
Manna House 8-20 Pocock Street SE1 0BW
Flat A Alphege House SE1 0BJ
Flat B Alphege House SE1 0BJ
59a Webber Street London SE1 0RF
St Alphege Clergy House Pocock Street SE1 0BJ
The Convent 48 Rushworth Street SE1 0RB
3a St Georges Cottages Glasshill Street SE1 0SH
3b St Georges Cottages Glasshill Street SE1 0SH
3c St Georges Cottages Glasshill Street SE1 0SH
Studio 2 63 Webber Street SE1 0QW
1 St Georges Cottages Glasshill Street SE1 0SH
2 St Georges Cottages Glasshill Street SE1 0SH
33 Rushworth Street London SE1 0RB
17 Rushworth Street London SE1 0RB
Unit 8 33 Rushworth Street SE1 0RB
30 Kings Bench Street London SE1 0QX
Unit 14 33 Rushworth Street SE1 0RB
Unit 15 33 Rushworth Street SE1 0RB
Unit 16 33 Rushworth Street SE1 0RB
20 Rushworth Street London SE1 0RB
65 Glasshill Street London SE1 0QR
Newspaper House 65 Webber Street SE1 0QP
Unit 23 33 Rushworth Street SE1 0RB
Unit 24 33 Rushworth Street SE1 0RB
Ground Floor Pegasus House SE1 0BE
First Floor To Fourth Floor Pegasus House SE1 0BE
30 Rushworth Street London SE1 0RB
14 Bench Apartments 22 Kings Bench Street SE1 0QX
15 Bench Apartments 22 Kings Bench Street SE1 0QX
16 Bench Apartments 22 Kings Bench Street SE1 0QX
Flat 3 Patrick Court SE1 0GB
Flat 4 Patrick Court SE1 0GB
Flat 5 Patrick Court SE1 0GB
Flat 1 Patrick Court SE1 0GB
Flat 2 Patrick Court SE1 0GB
13 Bench Apartments 22 Kings Bench Street SE1 0QX
6 Bench Apartments 22 Kings Bench Street SE1 0QX
7 Bench Apartments 22 Kings Bench Street SE1 0QX
8 Bench Apartments 22 Kings Bench Street SE1 0QX
3 Bench Apartments 22 Kings Bench Street SE1 0QX
4 Bench Apartments 22 Kings Bench Street SE1 0QX
5 Bench Apartments 22 Kings Bench Street SE1 0QX
12 Bench Apartments 22 Kings Bench Street SE1 0QX
9 Bench Apartments 22 Kings Bench Street SE1 0QX
10 Bench Apartments 22 Kings Bench Street SE1 0QX
11 Bench Apartments 22 Kings Bench Street SE1 0QX
Flat 36 Sharpley Court SE1 0BJ
Unit 101 Foundry Annexe 65 Glasshill Street SE1 0QR
Flat 33 Sharpley Court SE1 0BJ
Flat 34 Sharpley Court SE1 0BJ
Flat 35 Sharpley Court SE1 0BJ
18-19 Rushworth Street London SE1 0RB
12 Rushworth Street London SE1 0RB
Unit 103 Foundry Annexe 65 Glasshill Street SE1 0QR
Church Hall St Alphege Church SE1 0QX
24 Kings Bench Street London SE1 0QX
Flat 32 Sharpley Court SE1 0BJ
Flat 23 Sharpley Court SE1 0BJ
Flat 24 Sharpley Court SE1 0BJ
Flat 25 Sharpley Court SE1 0BJ
Flat 20 Sharpley Court SE1 0BJ
Flat 21 Sharpley Court SE1 0BJ
Flat 22 Sharpley Court SE1 0BJ
Flat 29 Sharpley Court SE1 0BJ
Flat 30 Sharpley Court SE1 0BJ
Flat 31 Sharpley Court SE1 0BJ
Flat 26 Sharpley Court SE1 0BJ
Flat 27 Sharpley Court SE1 0BJ
Flat 28 Sharpley Court SE1 0BJ
6 Eliza House 38 Glasshill Street SE1 0QR
7 Eliza House 38 Glasshill Street SE1 0QR
8 Eliza House 38 Glasshill Street SE1 0QR
3 Eliza House 38 Glasshill Street SE1 0QR
4 Eliza House 38 Glasshill Street SE1 0QR
5 Eliza House 38 Glasshill Street SE1 0QR
Flat 1 Newspaper House SE1 0RB
Flat 2 Newspaper House SE1 0RB
28 Glasshill Street London SE1 0QR
28a Glasshill Street London SE1 0QR
40 Kings Bench Street London SE1 0QX
2 Eliza House 38 Glasshill Street SE1 0QR
Apartment 4 10 Rushworth Street SE1 0RB
Apartment 5 10 Rushworth Street SE1 0RB
Apartment 6 10 Rushworth Street SE1 0RB
Apartment 1 10 Rushworth Street SE1 0RB
Apartment 2 10 Rushworth Street SE1 0RB
Apartment 3 10 Rushworth Street SE1 0RB
9 Rushworth Street London SE1 0RB
1 Eliza House 38 Glasshill Street SE1 0QR
Apartment 7 10 Rushworth Street SE1 0RB
Apartment 8 10 Rushworth Street SE1 0RB
Apartment 9 10 Rushworth Street SE1 0RB

14 Rushworth Street London SE1 0RB
 Unit 21 33 Rushworth Street SE1 0RB
 18 Pocock Street London SE1 0BW
 Second Floor 61 Webber Street SE1 0RF
 Ground Floor Studio 63 Webber Street SE1 0QW
 Rushworth And Friars Primary School Webber Street SE1 0RF
 20 Pocock Street London SE1 0BW
 First Floor 61 Webber Street SE1 0RF
 3 Kings Bench Street London SE1 0QX
 Newspaper House Kings Bench Street SE1 0QX
 Ground Floor 24-28 Rushworth Street SE1 0RB
 3d St Georges Cottages Glasshill Street SE1 0SH
 4 St Georges Cottages Glasshill Street SE1 0SH
 5 St Georges Cottages Glasshill Street SE1 0SH
 37 Rushworth Street London SE1 0RB
 Studio 1 63 Webber Street SE1 0QW
 Ground Floor 61 Webber Street SE1 0RF
 First Floor 24-28 Rushworth Street SE1 0RB
 Second Floor 24-28 Rushworth Street SE1 0RB
 Third Floor 24-28 Rushworth Street SE1 0RB
 Flat 32 Stopher House SE1 0SE
 Flat 33 Stopher House SE1 0SE
 Flat 34 Stopher House SE1 0SE
 Flat 29 Stopher House SE1 0SE
 Flat 30 Stopher House SE1 0SE
 Flat 31 Stopher House SE1 0SE
 Flat 38 Stopher House SE1 0SE
 Flat 39 Stopher House SE1 0SE
 Flat 40 Stopher House SE1 0SE
 Flat 35 Stopher House SE1 0SE
 Flat 36 Stopher House SE1 0SE
 Flat 37 Stopher House SE1 0SE
 Flat 28 Stopher House SE1 0SE
 Flat 19 Stopher House SE1 0SE
 Flat 20 Stopher House SE1 0SE
 Flat 21 Stopher House SE1 0SE
 Flat 15 Stopher House SE1 0RE
 Flat 17 Stopher House SE1 0SE
 Flat 18 Stopher House SE1 0SE
 Flat 25 Stopher House SE1 0SE
 Flat 26 Stopher House SE1 0SE
 Flat 27 Stopher House SE1 0SE
 Flat 22 Stopher House SE1 0SE
 Flat 23 Stopher House SE1 0SE
 Flat 24 Stopher House SE1 0SE
 Flat 57 Stopher House SE1 0SE
 Flat 58 Stopher House SE1 0SE
 Flat 59 Stopher House SE1 0SE
 Flat 54 Stopher House SE1 0SE
 Flat 55 Stopher House SE1 0SE
 Flat 56 Stopher House SE1 0SE
 Global House 96-108 Great Suffolk Street SE1 0BE
 96 Webber Street London SE1 0QN
 21 Rushworth Street London SE1 0RB
 Flat 60 Stopher House SE1 0SE
 15-16 Rushworth Street London SE1 0RB
 82 Great Suffolk Street London SE1 0BE
 Flat 53 Stopher House SE1 0SE
 Flat 44 Stopher House SE1 0SE
 Flat 72 Patrick Court SE1 0GB
 Flat 73 Patrick Court SE1 0GB
 Flat 74 Patrick Court SE1 0GB
 Flat 69 Patrick Court SE1 0GB
 Flat 70 Patrick Court SE1 0GB
 Flat 71 Patrick Court SE1 0GB
 84 Great Suffolk Street London SE1 0BE
 86-88 Great Suffolk Street London SE1 0BE
 Workshop Stopher House SE1 0RE
 Flat 75 Patrick Court SE1 0GB
 First Floor 20 Kings Bench Street SE1 0QX
 Ground Floor 20 Kings Bench Street SE1 0QX
 Flat 68 Patrick Court SE1 0GB
 Flat 59 Patrick Court SE1 0GB
 Flat 60 Patrick Court SE1 0GB
 Flat 61 Patrick Court SE1 0GB
 Flat 56 Patrick Court SE1 0GB
 Flat 57 Patrick Court SE1 0GB
 Flat 58 Patrick Court SE1 0GB
 Flat 65 Patrick Court SE1 0GB
 Flat 66 Patrick Court SE1 0GB
 Flat 67 Patrick Court SE1 0GB
 Flat 62 Patrick Court SE1 0GB
 Flat 63 Patrick Court SE1 0GB
 Flat 64 Patrick Court SE1 0GB
 Flat 11 Sharpley Court SE1 0BJ
 Flat 12 Sharpley Court SE1 0BJ
 Flat 13 Sharpley Court SE1 0BJ
 Flat 8 Sharpley Court SE1 0BJ
 Flat 9 Sharpley Court SE1 0BJ
 Flat 10 Sharpley Court SE1 0BJ
 Flat 17 Sharpley Court SE1 0BJ
 Flat 18 Sharpley Court SE1 0BJ
 Flat 19 Sharpley Court SE1 0BJ
 Flat 14 Sharpley Court SE1 0BJ
 Flat 15 Sharpley Court SE1 0BJ
 Flat 16 Sharpley Court SE1 0BJ
 Flat 7 Sharpley Court SE1 0BJ
 Second Floor Global House SE1 0BE
 Third Floor Global House SE1 0BE
 Ground Floor Global House SE1 0BE
 First Floor Global House SE1 0BE
 Flat 4 Sharpley Court SE1 0BJ
 Flat 5 Sharpley Court SE1 0BJ
 Flat 6 Sharpley Court SE1 0BJ
 Flat 1 Sharpley Court SE1 0BJ
 Flat 2 Sharpley Court SE1 0BJ
 Flat 3 Sharpley Court SE1 0BJ
 Flat 16, Lefroy House, Collinson Street London SE1 1QE
 50 Highsett Cambridge CB2 1NZ
 Flat 8 115 Brandon Street SE17 1AL
 63 Webber St. London
 8 Eliza House Southwark SE1 0QR
 27 Oswin Street London SE11 4TF
 2, Rushworth Studios, 63 Weeber Street SE1 0QW
 Flat 3 40 Rushworth Street SE1 0RB
 2 Eliza House 38 Glasshill Street SE1 0QR
 Flat 3, Newspaper House Rushworth Street,
 Flat 3 Newspaper House 40 Rushworth Street SE1 0RB

Re-consultation: n/a

APPENDIX 2

Consultation responses received

Internal services

Economic Development Team

Statutory and non-statutory organisations

Environment Agency

London Fire & Emergency Planning Authority

London Underground Limited

Metropolitan Police Service (Designing out Crime)

Natural England - London Region & South East Region

Thames Water - Development Planning

Neighbours and local groups

Apartment 1 10 Rushworth Street SE1 0RB

Apartment 9 40 Rushworth Street se1 0rb

Bridge Cottage Bridge Road SO41 9BZ

Email representation

Email representation

Flat 1, Newspaper House 40 Rushworth Street Se1 0rb

Flat 1, Newspaper House 40 Rushworth Street Se1 0rb

Flat 10, Bench Apartments 22 Kings Bench St SE1 0QX

Flat 11 Bench Apartments 22 Kings Bench Street SE1 0QX

Flat 12 Bench Apartments 22 Kings Bench Street SE10QX

Flat 16, Lefroy House, Collinson Street London SE1 1QE

Flat 3 Newspaper House 40 Rushworth Street SE1 0RB

Flat 3 40 Rushworth Street SE1 0RB

Flat 5 22 King'S Bench Street SE1 0QX

Flat 5 22 King'S Bench Street SE1 0QX

Flat 6, Newspaper House 40 Rushworth Street SE1 0RB

Flat 7 Newspaper House 40 Rushworth Street SE1 0RB

Flat 8 Newspaper House SE1 0RB

Flat 8 Newspaper House SE1 0RB

Flat 8 115 Brandon Street SE17 1AL

Flat 8 115 Brandon Street SE17 1AL

Glasshill Studios Kings Bench Street SE1 0QX

Newspaper House 40 Rushworth Street SE1 0RB

Raleigh Rotherhithe SE165GB

Rushworth Street 40 Southwark/ London SE10RB

Shardeloes Road 50d New Cross/ London SE146SL

11 Bench Apts 22 King'S Bench St SE1 0QX

12 Bench Apartments 22 Kings Bench Street SE1 0QX

12 Rushworth Street London SE1 0RB

2 Eliza House 38 Glasshill Street SE1 0QR

2, Rushworth Studios, 63 Weeber Street SE1 0QW

27 Oswin Street London SE11 4TF

42 Mill Road Epsom KT174AR

50, Hartfield Crescent Wimbledon SW19 3SD

50 Highsett Cambridge CB2 1NZ

6, Eliza House 38-40 Glasshill Street SE10QR
70 Golden Avenue W.Sussex BN161QU
8 Bench Apartments 22 King'S Bench Street SE1 0QX
8 Eliza House Southwark SE1 0QR
8 Eliza House 38 Glasshill Street SE1 0QR
8 Eliza House 38 Glasshill Street SE1 0QR
8 Ripley House London SE1 0RA
8 Ripley House London SE1 0RA
9 Newspaper House 40 Rushworth Street se1 0rb
94 Webber Street London SE1 0QN