

Item No. 7.1	Classification: Open	Date: 18 December 2018	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application:</p> <p>1. Application 17/AP/4230 for: Full Planning Application 2. Application 17/AP/4231 for: Listed Building Consent</p> <p>Address: 1-5 PARIS GARDEN AND 16-19 HATFIELDS, LONDON SE1 8ND</p> <p>Proposal: Phased redevelopment comprising: Phase 1: Demolition of 4-5 Paris Garden and 18-19 Hatfields to create a part 23 and part 26 storey tower building (+ double basement)(up to 115.75m AOD) to be used for offices (Class B1), above a new public space with flexible retail/professional services/restaurant uses (Classes A1/A2/A3) at ground floor level and restaurant/bar uses (Classes A3/A4) at third floor level; Phase 2: Partial demolition, refurbishment and extensions to 16-17 Hatfields and 1-3 Paris Garden for continued use as offices (Class B1) with flexible use of the ground floor level (Classes A1/A2/A3/A4/B1) and restaurant/bar uses (Classes A3/A4) at part fifth floor level; creation of a new public, landscaped roof terrace at part fifth floor level and green roof at sixth floor level; lowering of existing basement slab; new landscaping and public realm; reconfigured vehicular and pedestrian access; associated works to public highway; cycle parking; ancillary servicing and plant and other associated works.</p>		
Ward(s) or groups affected:	Borough and Bankside		
From:	DIRECTOR OF PLANNING		
Application Start Date 07/11/2017		Application Expiry Date 06/02/2018	
Earliest Decision Date 14/02/2018			

RECOMMENDATION

1. In relation to application 17/AP/4230:
 - a. That planning permission is granted subject to conditions and the completion of an appropriately worded s106 agreement, and referral to the Mayor for London;
 - b. That in the event that the s106 agreement is not completed by 31 March 2019, that the Director of Planning may be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 164 of this Committee report.

2. In relation to application 17/AP/4231:
 - a. That Listed Building Consent be granted, subject to conditions.

EXECUTIVE SUMMARY

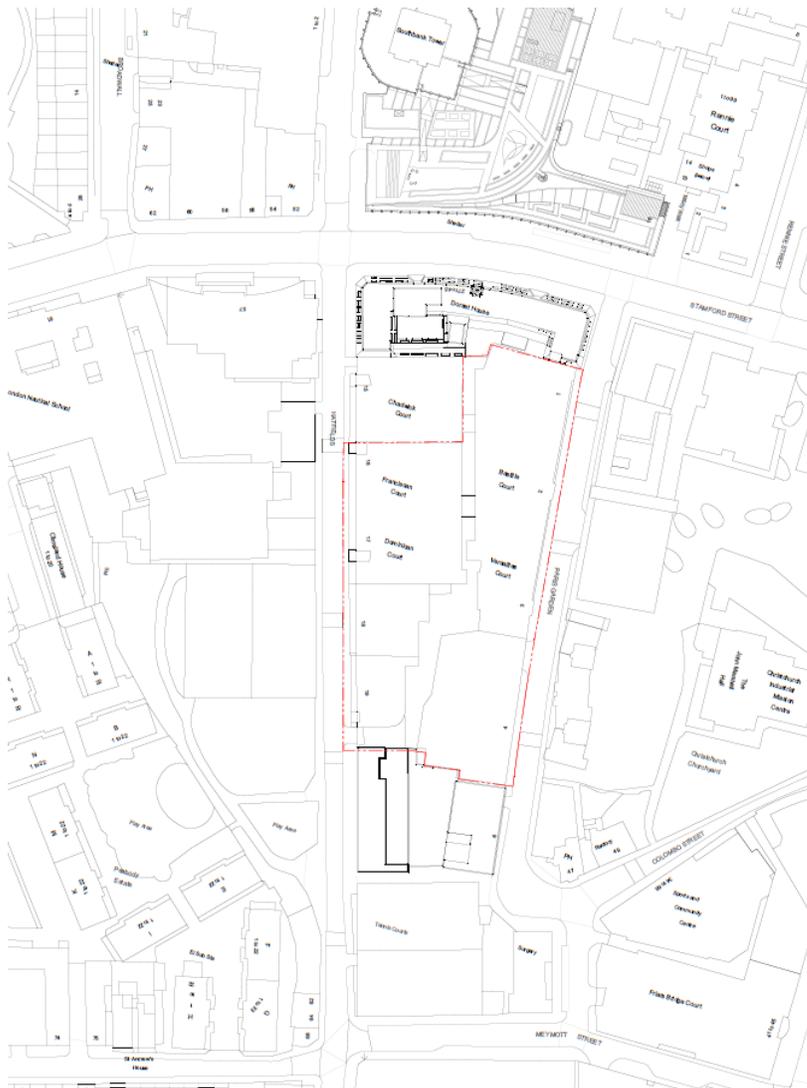
3. This major development would provide a significant amount of new office floorspace within the Central Activities Zone and the Bankside, Borough and London Bridge Opportunity Area. It also reconfigures the building edges to Hatfields and Paris Garden to create new retail units, animating streets which currently lack active frontages. As such, it will meet the requirements of the London Plan and local policies to increase jobs and support the wider economy of London, as well as reinforcing the town centre. It satisfies the 'required uses' of the site allocation within the emerging New Southwark Plan.
4. The office tower stands up to 26 storeys/115 metres high. The location is within, albeit on the periphery, of the tall building cluster at the northern end of Blackfriars Road, which is supported under the Core Strategy and the Blackfriars Road SPD. The building is significantly lower than the buildings at the heart of the cluster, such as 1 Blackfriars and the recently consented 18 Blackfriars, and as such makes a successful transition to the much more modest scale of development to the west in the London Borough of Lambeth. Although it would be visible in views from nearby conservation areas, it is not overly dominant in these views, and any limited harm to heritage assets is more than outweighed by the benefits of the scheme which include the refurbishment of the Listed Buildings, the creation of a new public route linking Hatfields and Paris Gardens, and a substantial new publically-accessible roof garden. Changes were made to the scheme to address the objection initially lodged by Historic England, which is now content for the applications be determined by the council in line with national and local policies.
5. The development would result in impacts on daylight to a number of nearby properties which extend beyond the levels recommended by the BRE; the worst affected properties are the student housing to the south and the as yet unbuilt affordable housing being delivered as part of the 18 Blackfriars Road development. In the latter case, the potential for a large scale development on this site was acknowledged when permission was granted for that scheme, and the developer has the obligation to consider adjusting internal layouts to reduce the impacts. These negative impacts are material considerations which need to be weighed against the positive benefits including job creation, economic development and new publically accessible space.
6. Servicing can be accommodated on site, and the development includes high quality cycle parking which is easily accessible and which exceeds the number required by the London Plan.
7. The development would provide tree planting and landscaping on a site which is currently barren, improving biodiversity and the green environment. Other environmental impacts have been considered, and none raise concerns which would indicate that permission should not be granted.
8. Both planning permission and Listed Building Consent would be required for the development to proceed, and the report recommends that permission should be

granted, with the planning permission being subject to a s106 agreement and referral to the Mayor for London.

BACKGROUND INFORMATION

Site location and description

9. The application site is approximately 0.62 hectares in size and is bounded by Paris Garden to the east, Hatfields to the west, Dorset House (27 to 45 Stamford Street) to the north and the student accommodation at 6 Paris Garden to the south. Hatfields forms the administrative boundary between Southwark and Lambeth.



10. The site currently comprises a series of buildings five storeys (+ basement) high all of which provide office accommodation (Class B1 use) totalling 25,016sqm. The existing buildings display a variety of architectural styles. A large proportion of the site is listed, with the terraced buildings at 15 & 17 Hatfields and 1, 2 and 3 Paris Garden both being Grade II listed as a result of their innovative concrete frames. These buildings have been subject to modern additions that are readily apparent and sit next

to more modern office building at 4-5 Paris Garden and 18 & 19 Hatfields.

11. The site is located within the Central Activities Zone, the Bankside, Borough and London Bridge (BBLB) Opportunity Area, Bankside and Borough District Town Centre and the Strategic Cultural Area. All of these designations have policy implications in terms of land use and scale of development. It is also within the area covered by the Blackfriars Road SPD.
12. The local area is of a very mixed character in terms of land use, building form and townscape. The neighbouring buildings in Southwark are principally commercial, with the notable exception of the student accommodation immediately to the south. South Bank Tower (155m AOD) and 1 Blackfriars (170m AOD) are located to the north of the site, while the recently consented 18 Blackfriars development (184m AOD) is immediately east on the opposite side of Paris Garden. Friars Bridge Court and the Hoxton Hotel development at 32-40 Blackfriars Road, which are currently under construction, rise to 86m and 64m AOD respectively. Though this central London scale is apparent along the Blackfriars Road corridor, this is juxtaposed with the more modest residential developments to the west, including the Peabody Estate, Climsland House and the characterful terraced streets between this location and Waterloo.
13. Hatfields Green and Christ Church Gardens are located either side of the development site, both of which are important open spaces given the density of surrounding development.
14. Though the site is not itself located within a conservation area, the development has the potential to impact the setting of Lambeth's Roupell Street Conservation Area and Waterloo Conservation Areas, located approximately 100m away to the west. The two conservation areas contain numerous Grade II listed buildings. Christ Church, located just east of the site, is Grade II listed.
15. The site is also located within Flood Zone 3, the borough Air Quality Management Area and the Bankside Controlled Parking Zone (CPZ).

Details of proposal

16. The proposed development is conceived as two distinct phases:
17. The first phase comprises the demolition of 4-5 Paris Garden and 18-19 Hatfields at the southern end of the site and erection of a part 23, part 26 storey office building (use class B1) with some limited retail and/or restaurant floorspace at ground floor level (A1/A2/A3 use classes) and a small amount of restaurant/bar floorspace (A3/A4 use class) at third floor level. This part of the proposal is elevated above a new area of public realm from which the new offices would be accessed and which provides a new east/west route between Paris Garden and Hatfields.
18. Phase two entails the partial demolition, refurbishment and extension of the two listed buildings that comprise the northern half of the site. The listed buildings would continue to operate primarily as office floorspace (use class B1), though retail use would be introduced at ground floor level and the existing façades would be altered in part to create level access from the street. Integral to this phase of the development would be the creation of a new public roof garden at fifth floor level atop the two listed

terraces. The roof garden would be a large planted space with different landscaped zones to allow the spaces to be used in different ways. The roof gardens would be fully accessible via escalator and lift access from the new public realm and Hatfields, respectively. Two café/restaurant pavilions are included atop the Paris Garden block.

19. In terms of floorspace, the scheme will deliver:
 - 56,395sqm new and refurbished office floorspace (B1)
 - 4,055sqm flexible retail/office floorspace (A1-A4 or B1).
20. The proposal requires a number of interventions to the listed buildings including the lowering of the ground floor slab in order to deliver more efficient office cores and create a more welcoming, level access on Hatfields and Paris Garden. A limited series of interventions are also required to the structural and masonry elements of the buildings, particularly at ground floor and basement levels. As noted above, single storey roof extensions would also be added to both listed buildings. The proposals would also amend the fenestration of the upper floors of both listed buildings to provide a finish that better reflects the original design of the buildings, rather than the more modern additions. All of these works require separate listed building consent, which is sought under planning application reference: 17/AP/4231.

Revisions to the original submission

21. Since the original submission, a series of revisions have been made to the submitted plans and documents to reflect some of the feedback through consultation. These changes principally relate to the alterations to the listed buildings and seek to address concerns raised by officers and Historic England. The main changes are that:
 - Roof extensions to the existing listed terraces are reduced in scale, particularly on Paris Garden;
 - Extent of roof gardens reduced to minimise the bulk of the extensions;
 - Introduction of two discrete roof garden pavilion structures;
 - Reduction in the extent of demolition and remodelling at ground and basement level in the listed buildings;
 - Retention of lightwells along Hatfields.
22. These changes are captured in a set of amended plans and technical documents that were the subject of a re-consultation for residents, businesses and other consultees in Southwark and Lambeth in late August 2018.

Relevant planning history

17/EQ/0299 - Pre-Application Enquiry

Partial demolition refurbishment and extensions to 16-17 Hatfields and 1-3 Paris Garden to create a mix of retail uses and office floorspace with a publicly accessible roof terrace, together with the comprehensive redevelopment of 18 and 19 Hatfields, and 4-5 Paris Garden to create a new ground floor level public plaza with an office tower above.

Pre-application enquiry closed, 02 November 2017

Relevant planning history of adjoining sites

23. 18 Blackfriars Road

16/AP/5239 – Full planning application

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

Granted with legal agreement, 21 June 2018

24. 6 Paris Garden & 20-21 Hatfields

17/AP/1032 – Variation of legal agreement

Variation of Schedule 1 Paragraphs 4.1.1 and 4.2 (Student Accommodation) of S106 Legal Agreement dated 11/02/2009 pursuant to planning permission 08/AP/2809 for: Erection of a part 9/part 13 storey (max height 41.3m AOD) building plus basement to provide 162 units (253 bedspaces) of student accommodation (Class C1 use).

The variation seeks to permit the letting of accommodation to the general public during the summer period.

Variation agreed, 08 June 2017

08/AP/2809 – Full Planning Permission

Erection of a part 9, part 13 storey (maximum height approximately 41.3 metres above ground level) building plus basement levels to provide for a mixed use development comprising a ballet school (Class D1 use) and 162 units (253 bed spaces) of student accommodation (Class C1 use) including bicycle and refuse storage and communal open space.

Granted with legal agreement, 11 February 2009

08/AP/1771 – Full Planning Permission

Erection of a part 13, part 11 storey (maximum height approximately 41.3 metres above ground level) building plus basement levels to provide for a mixed use development comprising a ballet school (Class D1 use) and 196 units (291 bed spaces) of student accommodation (Class C1 use) including bicycle and refuse storage.

Refused, 29 October 2008

Appeal dismissed, 18 May 2009.

Summary of main issues

25. The main issues to be considered in respect of these applications are:
- a) The principle of development and conformity with strategic land use policies;
 - b) Urban design, building heights and architecture;
 - c) Landscaping and provision of new public space;
 - d) Impacts on heritage assets, including the listing buildings within the site and the setting of heritage assets in the vicinity of the site;
 - e) Impact(s) on the amenity of neighbours and that of the wider area;
 - f) Transport and traffic issues;
 - g) Sustainability;
 - h) Planning obligations;
 - i) Other material considerations.

Planning policy

26. National Planning Policy Framework 2018
The revised National Planning Policy Framework (the Framework) was published in July 2018 and sets out the Government's planning policies. Paragraph 215 states that the policies contained in The Framework are material considerations in the determination of planning applications and the following sections are most relevant to this proposal:

Section 6 - Building a strong and competitive economy
Section 7 - Ensuring the vitality of town centres
Section 8 - Promoting health and safe communities
Section 11 - Making effective use of land
Section 16 - Conserving and enhancing the historic environment.

27. On 19 March 2013, the council's cabinet considered whether Southwark's planning policies were consistent with the Framework. All policies and proposals were reviewed and the council satisfied itself that those in use were in general conformity with the Framework. The resolution was that with the exception of Southwark Plan policy 1.8 (location of retail outside town centres), all local policies would be saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the Framework.

28. The London Plan 2016
Policy 2.11 – Central Activities Zone: Strategic priorities
Policy 2.12 – Central Activities Zone: Strategic functions
Policy 2.13 – Opportunity areas and intensification areas
Policy 2.15 – Town Centres
Policy 3.2 – Improving health and addressing health inequalities
Policy 4.2 – Offices
Policy 4.3 – Mixed use development and offices
Policy 4.7 – Retail and town centre development
Policy 4.12 – Improving opportunities for all
Policy 5.2 – Minimising carbon dioxide emissions
Policy 5.3 – Sustainable design and construction
Policy 5.10 – 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 6.9 – Cycling
Policy 6.10 – Walking
Policy 6.12 – Road network capacity
Policy 6.13 - Parking
Policy 7.2 – An inclusive environment
Policy 7.3 – Designing out crime
Policy 7.4 – Local character
Policy 7.5 – Public realm
Policy 7.6 – Architecture
Policy 7.7 – Location and design of tall and large buildings
Policy 7.8 – Heritage assets and archaeology
Policy 7.14 – Improving air quality
Policy 7.15 – ‘Soundscapes’
Policy 7.19 – Biodiversity and access to nature
Policy 7.21 – Trees and woodlands

29. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2 March 2018. The Examination in Public is due to commence in January 2019 and at this stage of preparation it can only be attributed limited weight.

30. Core Strategy 2011

Strategic Policy 1 - Sustainable development
Strategic Policy 2 - Sustainable transport
Strategic Policy 3 - Shopping, leisure and entertainment
Strategic Policy 10 - Jobs and business
Strategic Policy 12 - Design and conservation
Strategic Policy 13 - High environmental standards
Strategic Policy 14 - Implementation

31. Southwark Plan 2007 (July) - saved policies

Policy 1.1 – Access to Employment Opportunities
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 3.6 – 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 3.15 – Conserving the historic environment
Policy 3.17 – Listed buildings
Policy 3.18 – Setting of conservation areas, listed buildings and World Heritage sites

Policy 3.19 – Archaeology
Policy 3.20 – Tall buildings
Policy 5.1 – Locating developments
Policy 5.2 – Transport impacts
Policy 5.3 – Walking and cycling

32. New Southwark Plan – Proposed submission version (December 2017)

For the last 5 years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. It is anticipated that the plan will be adopted in 2019 following an Examination in Public (EIP). As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework. The following policies are of greatest relevance to this application:

33. P11 – Design of Places
P12 – Design quality
P14 – Tall buildings
P16 – Listed buildings and structures
P18 – Conservation of the historic environment and natural heritage
P26 – Office and business development
P39 – Access to employment and training
P61 – Environmental standards

Site Allocation NSP21: 1-5 Paris Garden and 16-19 Hatfields

34. Supplementary Planning Documents

Blackfriars Road SPD 2014
S106 Planning Obligations and CIL SPD 2016
Central Activities Zone SPG 2016
Crossrail Funding SPG 2016

Consultation responses

35. Neighbour responses

20 objections have been received via public consultation. Key issues raised through the objections include:

- No need for new offices; housing should be prioritised;
- More restaurants and bars will detract from the current residential environment
- The building is too tall on a narrow side street that sits outside the Blackfriars Road tall building cluster;
- Loss of daylight/sunlight to surrounding properties (particularly the Peabody Estate and Climsland House)
- Overshadowing impact on Hatfields Green;
- Impacts on the architectural integrity of the listed buildings;

- Harmful impact on nearby conservation areas including those within LB Lambeth;
 - Scale of development will lead to significant harmful impacts during construction;
 - A lack of consultation.
36. A detailed statement was submitted by the Lambeth Estate Residents' Association (LERA) highlighting concerns with the scale of development, building heights and the impact on the setting of the Roupell Street Conservation Area located to the west of the site in Lambeth. The response asserts that the location is inappropriate for a building of this scale, that the benefits of the public realm are offset by the impacts of the tall building on local wind conditions and that the rooftop terraces will require management if impacts on local amenity are to be avoided.
37. Historic England
Historic England identified that the development would appear in views from within several conservation areas in Lambeth, would represent a contrast in scale and materiality and, as such, could cause some harm to their setting. They raise no objection to the development, but stress that (in accordance with the NPPF) the planning authority should weigh any harm to heritage assets against the public benefits of the scheme. Historic England did submit a formal objection to the associated Listed Building Consent application, 17/AP/4231, but the revisions to the scheme detailed above have allowed this to be removed.
38. GLA, TfL and other statutory consultees
The application is referable to the Mayor of London by virtue of its height being over 30m. The GLA in their Stage 1 response commented that:
- The land uses proposed, including the significant uplift in office floorspace in the CAZ, are supported;
 - The height and massing are supported subject to the highest quality of materials and design detailing being secured;
 - The development would contribute to a varied local townscape and its impact is considered acceptable in this regard;
 - Further revisions required with regard to climate change and transport in order to fully comply with the London Plan.

A more detailed response has been provided by Transport for London and this is reflected in the Transport section below. Consultation responses have also been received from the Environment Agency, Thames Water, the Metropolitan Police and Arqiva, which are referenced in the appropriate sections below.

39. Neighbouring boroughs
The London Borough of Lambeth have raised no objection to the proposal but has submitted a series of comments on the land use, heritage, transport and amenity impacts of the development and these issues are considered in more detail below. The City of London has confirmed that they have no observations to make in relation to this proposal.

Re-consultation

40. A formal re-consultation was held to provide an opportunity for interested parties to

comment on the revisions to the scheme described above. Three of the original objectors took this opportunity to reiterate their concerns.

Principle of development

41. The development would provide a very significant quantum of office floorspace, capable of accommodating major businesses, and also introduce retail space along the street frontages to animate the public realm.
42. The site is located in the Central Activity Zone, Bankside, Borough and London Bridge Opportunity Area and the area covered by the Blackfriars Road SPD. The London Plan is clear that the Central Activities Zone (CAZ) should be the focus for economic growth to support London as a whole. The role of the CAZ as an internationally and nationally significant office location is emphasised in the CAZ SPG, which projects a need for 177,000 additional office jobs and 2.3million sqm of office floorspace over the period between 2011 and 2031.
43. Core Strategy Policy 10 sets out that we will increase the number of jobs in Southwark and create an environment in which business can thrive. The policy states that we will support the provision of between 400,000 and 500,000sqm of new business floorspace in the Bankside, Borough and London Bridge Opportunity Area over the plan period. The council's latest Employment Land Review: [https://www.southwark.gov.uk/assets/attach/5896/EB23%20-%20Southwark%20Employment%20Land%20Review%20\(2016\).pdf](https://www.southwark.gov.uk/assets/attach/5896/EB23%20-%20Southwark%20Employment%20Land%20Review%20(2016).pdf) (prepared to underpin the New Southwark Plan) echoes the Core Strategy target, setting out a need for 460,000sqm of office space over the plan period, particularly for high quality Grade A office space. This evidence supports emerging policy P26 in the New Southwark Plan, which stresses the continued need to retain and increase business floorspace.
44. More detailed guidance on business space is set out in the Blackfriars Road SPD. The SPD states that we will encourage new jobs and businesses in this area to reinforce its role as a strategic office and employment location. Specifically, the guidance states that new B1 office floorspace should be designed flexibly to attract a range of businesses and contribute to a diverse stock of business accommodation. The SPD supports the provision of a mix of other town centre uses to contribute to a more vibrant commercial offer - especially shops, restaurants, cafes and bars where they would not have a harmful impact on local amenity.
45. The proposal would lead to a significant uplift in office (B1a) floorspace on a site that currently operates in this way. In doing so, the development would contribute to the ambitions for job creation – the scheme is anticipated to generate around 3,000 new jobs - and economic growth that are clearly set out in the Development Plan and supporting guidance. In addition, the introduction of a range of retail and restaurant units at a reconfigured ground level would help to animate streets that are current lacking in active frontages, providing additional services for the local working and resident populations.
46. The office and retail uses proposed are consistent with those required by draft Site Allocation NSP21. It also states that residential use should be provided, however, this would reduce the quantum of office floorspace that could be achieved in a location

where employment generation is a strategic priority and would also introduce a number of challenges linked to servicing and neighbour amenity. A commercial proposal is considered to represent the most efficient use of the site.

47. The proposal would deliver a 1000sqm landscaped roof garden on top of the refurbished listed buildings. This is a significant benefit in a part of the borough identified in the council's open space strategy as being deficient in publically accessible open space. The roof gardens would complement the existing open spaces at Hatfields Green and Christ Church Gardens and add to the number and diversity of spaces available. A new public route beneath the office tower delivered in Phase 1 would deliver another benefit and be consistent with the draft policy in NSP21.
48. From a land use perspective, the proposed development is strongly supported. The uplift in high quality floorspace would make a valuable contribution to the vision for employment growth and the delivery of complementary town centre uses that are established in the Development Plan. The existing Southwark Plan, emerging New Southwark Plan and Blackfriars Road SPD also advise that development needs to be of a scale and nature that is appropriate in its context, exhibit the highest quality of design and respect the amenity of neighbours. These issues are explored in more detail below.

Environmental impact assessment

49. An Environmental Impact Assessment (EIA) Screening Opinion was sought under application reference 17/AP/2038. The Screening Opinion related to a 26 storey commercial building comprising office and retail floorspace. In issuing the Opinion, officers concluded that the proposed development would not constitute EIA development as described in Schedule 1 of the EIA Regulations 2011 (as amended), that the development was not located in a sensitive area (as defined in the Regulations) and, in light of its scale, it would not be considered an 'Urban Development Project' likely to generate significant environmental impacts. As such, no EIA has been undertaken and officers are agreed that this is appropriate.

Design and Heritage

50. Phase 1 of the proposal includes a significant tall building, which would be viewed in the context of the emerging tall building cluster anticipated by the Core Strategy and Blackfriars Road SPD. Although it is on the periphery of this cluster, and close to the conservation areas in Lambeth, the height and design of the tower enables it to sit comfortably within this changing context. The alterations to the existing buildings, including the Listed buildings are acceptable, and together with the improved public realm mean that the development would have a positive impact on the local townscape.
51. The characteristics of the site mean that design and heritage considerations should be afforded significant material weight. The scheme comprises the retention and refurbishment of two large Grade II listed buildings, introduces a new tall building and has to mediate between two very different scales of development to the east and west.
52. Recent planning permissions have led to the creation of a recognisable cluster of tall buildings at the northern end of Blackfriars Road. As noted above, the South Bank

Tower, 1 Blackfriars, 18 Blackfriars Road and the Sampson and Ludgate schemes all include tall buildings in excess of 150m AOD, but this cluster is itself supported by a series of lower, but still significant, tall buildings of between 15 and 20 storeys. In wider townscape terms, the emerging tall buildings around Waterloo are also discernible in longer views to the west. Collectively these developments demonstrate that the site is located in an area of significant growth that reflects the Opportunity Area designations.

53. Core Strategy Policy 12 states that development should achieve the highest quality of design. In the context of the Blackfriars Road corridor, the associated SPD states that this should include reinforcing the civic character and scale of Blackfriars Road, reinforcing the townscape, enhancing heritage assets and their settings and introducing a finer grain of development off the main routes. The draft Site Allocation in the New Southwark Plan states that the site might be suitable for a tall building.
54. With the part 23/part 26 storey office building in the first phase of development reaching 115m AOD, it is necessary to comply with the detailed criteria set out in the council's tall buildings policy as set out in Saved Southwark Plan policy 3.20.
55. Policy 3.20 requires any tall building to ensure that it:
 - i. Makes a positive contribution to the landscape; and
 - ii. Is located at a point of landmark significance; and
 - iii. Is of the highest architectural standard; and
 - iv. Relates well to its surroundings, particularly at street level; and
 - v. Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

Landscape contribution

56. The requirement in respect of landscape highlights the role that public realm plays in any tall building proposal. This is both to contribute to the setting of tall buildings but also to ensure that an adequate and proportionate public benefit flows from the substantial private gain in height.
57. In this case the landscaped element of the proposal includes a public thoroughfare that extends from the small park on Hatfields across the site to Paris Garden and Christchurch Gardens beyond. The majority of the site covered by the buildings to be demolished - Nos 18-19 Hatfields and No 4 Paris Garden - is devoted to this landscaped public route, around 25m wide and 3-storeys high. The tower is proposed to be raised (on stilts) above this space to allow this clear route to extend across the site. The route will be edged with active uses and landscaped with new trees and seating and will provide a dramatic threshold for the new office building, contributing to a sense of arrival that is appropriate given its scale.

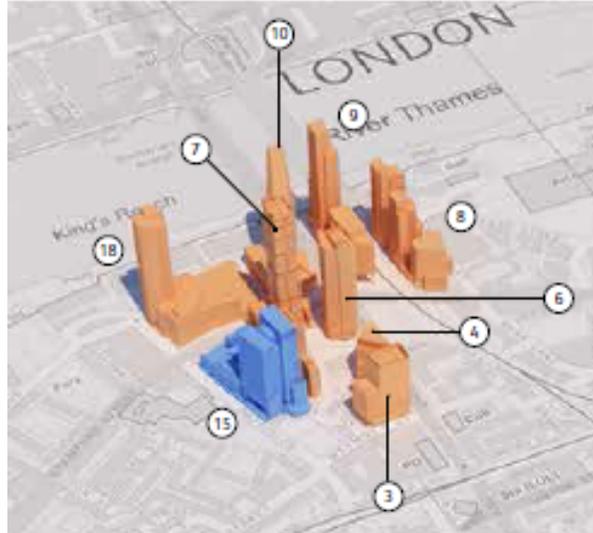


Above: View of public route and garden access looking north from Hatfields Green

58. Beyond that, the roof-top areas of the two listed buildings are proposed to be turned into a landscaped publically accessible garden or park. This is intended to be open to the general public with free-to-use public lifts accessible from Hatfields and an escalator which can be accessed from the Paris Garden end of the thoroughfare. This roof-top park is intended to be open to the public during the daytime. It will offer roof-top views of the immediate area and a lush garden setting in an elevated location. The management and access arrangements for this space are to be secured via obligations in the s106 legal agreement.
59. Together, these two aspects of the proposal (the thoroughfare across the site and the roof-top park) devote a large proportion of the site area to a publicly accessible landscape. As such the proposal is considered to make a meaningful contribution to the landscape.
60. A sizeable private roof terrace for office occupiers is included at 24th floor level. Further detail of the landscaping and balustrade treatments would be secured via condition and the hours of use would be restricted to limit the potential for noise nuisance in the evenings and at weekends.

Landmark/Locational significance

61. The recently consented 18 Blackfriars Road and the preceding No 1 Blackfriars and Ludgate House permissions demonstrated that the area around the junction of Blackfriars Road and Stamford / Southwark Streets is appropriate for tall buildings. Indeed, this pattern of development is supported in the Blackfriars Road SPD.
62. When this was considered at 1 and 20 Blackfriars Road Public Inquiry the Inspector concluded that: "*The location is, in principle, an appropriate one for a tall building (even a very tall building) as defined in London Policy 4B.9 and Southwark Plan Policy 3.20.*" This finding referred to the tallest buildings proposed for these sites which are consented (and implemented) at a height of around 170 - 180m AOD forming a 'cluster' of tall buildings around this point of landmark significance.



Above: Image of the proposed development in the context of the emerging tall building cluster at the northern end of Blackfriars Road

63. The site is located further away from the core of this cluster of tall buildings. However, being located just across the road from the consented 18 Blackfriars Road demonstrates that it forms part of the sphere of visual influence of the cluster of tall buildings.
64. As such, and whilst the site may not be appropriate for the tallest building in the cluster, it will form an important part of the edges of the cluster where a tall building of a lower scale can help to mediate between the residential scale of the prevailing buildings to the west and the very tall buildings at the core of the cluster.

Architectural quality

65. The new commercial tower is designed as a pair of joined simple rectangular extrusions that follow the splayed alignment of the two road frontages on Hatfields and Paris Garden. This arrangement takes its cue from the recently constructed student housing scheme immediately to the south, which is made up of two blocks with a gap between them. The two-building model not only reflects the existing urban pattern but also helps to reduce the apparent scale of the proposed building. By joining the two blocks with a lightweight 'infill' the design emphasises the two-building approach. Further, the two extrusions are arranged in different heights (one at around 100m AOD and the other at 115m AOD) so that they appear as two separate elements especially when viewed from a distance.
66. The design is highly articulated with high quality materials - metal and glass - forming an elegant gridded lattice-like framework that extends across the facade of the two blocks. The lift and staircores can be seen on the northern face of the building and add a dynamic and engaging feature to the design. The most striking feature of the design of the commercial tower is the large and generous thoroughfare on the ground floor, as discussed earlier. In order to deliver this public benefit, the tower has been lifted up on stilts to allow the public to permeate across the site.

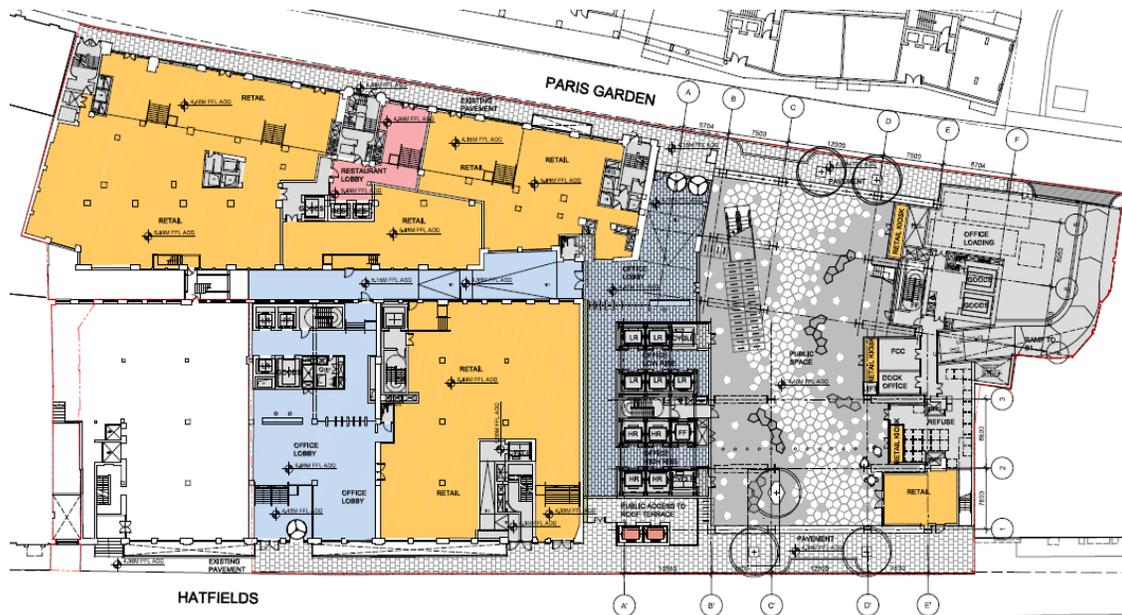


Above: View looking south along Hatfields

67. The additions to the listed buildings are considered separately later in the report but are worth noting as part of the consideration of overall design quality. On the Paris Garden frontage the two additional floors have been terraced back and set behind the surviving retained historic 'mansard' structures. On the roof-top garden level two restaurants have been designed as pavilions accessed via a separate central core. On Hatfields the additional floor is designed as a simple fanned structure with large picture windows. The views submitted with the application demonstrate that the additional floor/s are less visible from the narrow streets which surround the site. Where they are visible from the wider area they are designed as simple set-back forms that serve to highlight the roof-top garden available to the public.
68. The scheme was reviewed by the Southwark DRP in June 2017 at the pre-application stage. In conclusion, the Panel generally supported the proposal and they endorsed its public benefits including the public space at the ground floor and the elevated public park. They challenged the designers to further refine the detailed design and massing of the tower; to complete the design of the public spaces and the access to the elevated garden; and to agree the principles of public access to the elevated park, prior to submitting a planning application.

Relationship with local context

69. The proposal is designed in two parts, the commercial tower and the listed buildings. The existing buildings fail to address the streets and are difficult to access. This is primarily due to the raised ground floor, traditional in such commercial properties but now resulting in a compromised relationship with the surrounding streets.
70. The ground floor of the commercial tower is almost entirely devoted to public access where the building has been raised by three floors to allow a large and generous landscaped route across the site. In order to improve the relationship with the street the listed buildings have each required a bespoke design approach which takes into account their architectural and historic significance, which is in their internal structure.



Above: Ground floor layout plan

71. On Paris Garden, where the raised ground floor of the original reinforced concrete structure has been heavily modified, the design involves removing one structural bay in order to lower the floor and create a new parade of shops which will be level with the pavement.
72. On Hatfields where the most significant parts of the existing building are its ground and first floor structures, the proposed changes are more modest. Here only two bays of the ground floor are removed to allow access to the commercial property and one large retail unit. In this way the majority of the architectural and historic significance of the buildings has been preserved and the access to the properties significantly improved.
73. With these changes the scheme is proposing to fundamentally improve the relationship of the property to the street. The improved permeability and the benefit of a new public space and route across the site improve connectivity and permeability across the area. In particular the links to nearby open spaces, routes and even Blackfriars Station place a greater emphasis on the need for such routes. The creation of active accessible frontages at the bases of the listed buildings on Paris Gardens and Hatfields significantly improve the relationship of these historic buildings to their surroundings at ground level.

Contribution to the skyline

74. The application was accompanied by a Townscape and Visual Impact Assessment (TVIA) conforming with the requirements of the London View Management Framework (LVMF) and including Accurate Visualisations and wireline renderings of the proposal in a number of views. The views include strategic London Wide LVMF views, views of local heritage assets which may be sensitive to change and immediate local views.

75. In the wider London views the building will appear as two narrow but linked extrusions set well back from the river edge and at a scale that is consistent with the northern end of the Blackfriars Road as established by developments like 240 Blackfriars Road or the London Television Centre (in Lambeth) - which appear to be of a similar overall height and scale in the views. In the local river prospects and from several approaches the proposed building is one of the lower buildings which step up to form the cluster of towers emerging at the northern end of the Blackfriars Road.



76. In the LVMF views the TVIA demonstrates that the proposal does not affect any of the Strategic Vistas and does not affect the viewer's ability to recognise and appreciate the Strategic Landmarks of St Paul's Cathedral or the Palace of Westminster WHS.

Impact on the character and setting of local heritage assets

Setting of Southwark Heritage Assets

77. The views demonstrate that the proposed building will have an immediate and direct visual impact on the backdrop of the Grade II Listed Christchurch on Blackfriars Road itself however this impact is mitigated when one takes into account that the recently consented 18 Blackfriars Road includes a 15 storey affordable housing block along Paris Garden immediately to the rear of the church and in front of this proposal. This is a material consideration and will mitigate any impact that this building might have on this important heritage asset. In this view the building will appear to be layered behind the affordable housing block in the foreground and will not cause further harm to the setting of the listed building.



Above: View of the Paris Garden elevation from Blackfriars Road with outline of 18 Blackfriars scheme (16/AP/5239) in the foreground

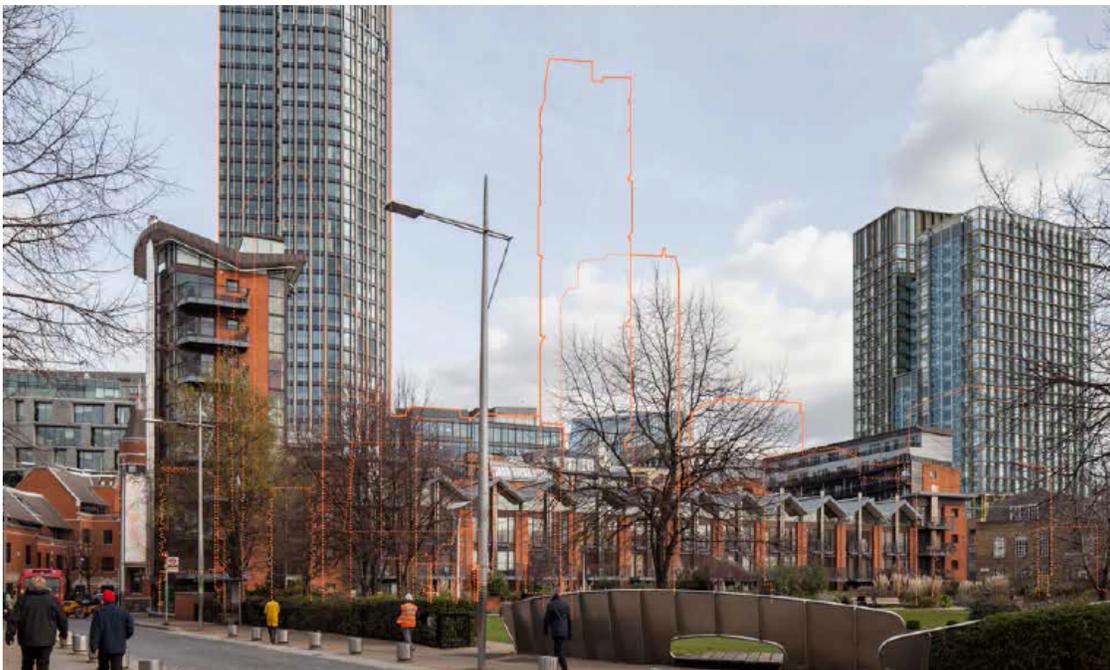
78. In the view from the South Bank, which is the clearest view of the Bargehouse Alley Conservation Area, the building appears to the south and away from the most distinctive historic feature of this conservation area, which is the Oxo Tower building

Setting of Lambeth Heritage Assets

79. The most sensitive historic views are currently from the west and the Lambeth Conservation Areas including the Roupell Street and Waterloo Conservation Areas and across the park at the southern end of Hatfields. Local views are not afforded any specific protection under the LVMF and protected views. In these cases the council's policies echo the requirements of the Listed Buildings and Conservation Areas Act (1991) and the NPPF (2018) and require all development to conserve or enhance the character and appearance of a designated conservation area and its setting. Views from inside and outside a conservation area contribute to its setting and are sensitive to inappropriate or dominant incursions.



Above: Local view of the development from the western end of Roupell Street with outlines of local consented schemes



Above: View from Upper Ground looking south-east across Bernie Spain Gardens

80. The views submitted with the application highlight a number of locations from which the development is visible. They demonstrate that it will be more visible from closer locations at the eastern end of Roupell Street as well as on axis on Exton Street and Aquinas Street in the Waterloo Conservation Area. The visual impact is limited in Roupell Street - it is mainly an oblique view over the rooftops of the worker's cottages and it does not appear to be dominant. As such it is considered to be of limited, if any, harm. In the more axial views from Aquinas Street and Exton Street the proposal will be more immediately apparent but no more harmful than the consented and

implemented schemes at 1 and 18 Blackfriars Road which tower over this proposal when they are considered together.

81. It is not considered that the introduction of this proposal causes harm to the conservation areas and their intensely urban settings. In the views the proposed building will appear layered behind the historic foreground in a similar way to the existing Kings Reach Tower or the London Television Centre. The towers in the emerging cluster are visually distinct and stand apart and whilst this building will appear more bulky than the more slender residential towers, it is of an appropriate mid-height scale so as not to appear overly dominant or harmful. Any harm to a heritage asset should be avoided but the NPPF outlines in paragraph 196 that any harm should be weighed against the public benefits of the proposal including securing an optimal viable use. In this case it is considered that that limited harm caused by the proposed development is outweighed by the public benefits of the development including the new route across the site and the landscape thoroughfare, the new publicly accessible roof-top garden including permanent escalator and lift access as well as the preservation and restoration of the two listed buildings for future generations.

Design conclusions

82. In conclusion, the proposed development is a worthy addition to the London skyline. It contributes positively to the established and emerging cluster of towers at the northern end of the Blackfriars Road. It will mediate between the towers and the lower residential scale to the west and south and introduce a high quality sculptural form of two elegant linked glass and metal clad towers.
83. The quality of the design of this development will rely to a large degree on the quality of the detailing and the choice of materials. Added to that, as a tower it is imperative that the fabrication and detailing are tested for precision and construction purposes. Accordingly, if this proposal is approved, it is proposed that a full-scale mock-up of a typical floor including the main tower facade and the infill element is prepared as well as large scale architectural details of the proposal should be reserved by condition.

Impact on listed buildings at 1-3 Paris Garden and 15-17 Hatfields

84. Application reference 17/AP/4231 seeks listed building consent for the alterations to the existing buildings. The buildings which are to be demolished are not listed.
85. Listed Building Consent is considered under the terms of the Listed Building and Conservation Areas Act (1991) [the Act] as amended and updated. The main principles of the Act are repeated in the NPPF (2018), and reinforced by the council's policies, and associated guidance documents.
86. The Act places great weight on the 'special interest' of heritage assets and their settings, and stresses the importance of preserving and enhancing their architectural and historic significance. The NPPF reinforces these principles stressing that heritage assets are irreplaceable and once lost can never be recovered. It requires Local Planning Authorities to avoid harm to heritage assets and to ensure that development conserves and enhances heritage assets and their settings.

Understanding the significance and the proposal

87. Paragraph 190 of the NPPF requires Local Planning Authorities to identify the architectural or historic significance of a designated heritage asset and to record the effect of any proposal on that architectural or historic significance.
88. The two listed buildings were former printing works constructed at the beginning of the twentieth century using rival innovative systems of patented reinforced concrete construction: 16-17 Hatfields utilised the Hennebique system and 1-3 Paris Garden the Kahn system. The systems have proved hugely influential as they allowed the construction of large floor spans capable of handling heavy loads, as well as being particularly fire resistant. The two buildings are therefore of considerable technical interest and this forms the principal basis for their listing. Although the buildings have each been subject to modern interventions and extensions, key aspects of their significance remain legible and intact. In the case of Paris Garden, the building is also considered to be of architectural merit; for its combination of architectural styles, its detailed roofline and its decorative central tower. Historic England emphasise that the significance of the two buildings is enhanced by their close proximity, which helps to convey the major breakthrough in construction technology that the buildings represent.

Assessment of harm to significance

89. The NPPF requires Local Planning Authorities to consider whether a proposal would result in harm to the significance of a heritage asset and to decide whether that harm would be 'substantial' or 'less than substantial'.
90. Paragraphs 195 and 196 of the NPPF also require Local Planning Authorities to weigh any that harm against the public benefits of the development proposed, including securing the optimal viable use of the heritage asset.
91. Any harm should require clear and convincing justification and can arise from the loss of historic fabric or features of significance as well as impact on the setting of a heritage asset. In accordance with paragraph 194 of the NPPF, both 'substantial' or 'less than substantial', any harm should be avoided and should be exceptional in the case of Grade II listed buildings and wholly exceptional in the case of assets of highest significance.
92. In March 2018, Historic England raised significant concerns that the proposed development would cause significant harm to the technical and aesthetic qualities of the two listed buildings; 1-3 Paris Garden and 15-17 Hatfields and lodged an objection to the listed building consent application. Although it was noted that the proposal would reinstate some of the original fenestration to the listed building, the major alterations to the ground floor bays and internal structural arrangements were considered to harm the integrity of the listed buildings to such an extent that it would cause serious harm to their significance. On Paris Garden specifically, Historic England set out that the glazed roof extension would also compromise the composition of the building, detracting from its architectural significance. They concluded that the interventions would have a profound and harmful impact and that an alternative approach was required.

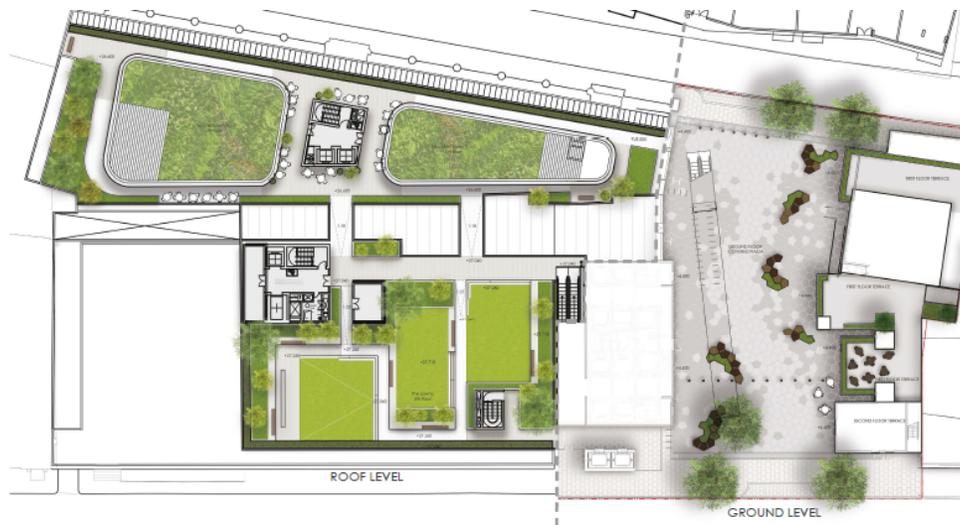
93. A number of alterations have since been proposed and were the subject of reconsultation. Principally, this involved the reduction in scale of the Paris Garden roof extension and the introduction of a more traditional mansard arrangement; a more modest reduction in scale of the Hatfields roof extension; reductions in the extent of change to the ground floor structural bays, including the retention of lightwells on Hatfields, and a much reduced level of demolition to the internal structural elements of the listed buildings, particularly at basement level.
94. The changes have been cautiously supported by Historic England, but further structural investigations have been requested to confirm the extent of intervention that will be required. The fact that the offices are currently tenanted means that invasive studies are not possible at this time, but further detail has been forthcoming to demonstrate that the level of intervention can be reduced. It is noted that as printing works, the buildings would have been able to withstand heavy loads in excess of those generated by modern offices and, indeed, this robustness contributes to their listed status. This reduces the risk that further strengthening of the existing concrete frames would be required to deliver the roof top extensions to the listed buildings. It is agreed that a condition would be included on any listed building consent to require further structural investigations to be undertaken prior to the commencement of the Phase 2 works. This approach has been endorsed by Historic England, who formally withdrew their objection on 9 November 2018.

Conclusion on heritage

95. The scheme amendments secured have reduced the level of intervention required to deliver the proposed development and in doing so have reduced the extent of harm to the listed buildings. Officers are satisfied that the proposal demonstrates that it conforms with the Listed Building and Conservation Areas Act (1991) as amended and updated. It complies with current policy to: preserve and enhances the heritage asset and its setting; provide good design; and address issues raised by statutory consultees and should therefore be granted Listed Building Consent.

Trees and green infrastructure

96. The site currently has an absence of trees and so redevelopment provides an opportunity to boost the on-site green infrastructure. Plans identify that 5x street trees are to be installed either side of the entrance to the new public route and the indicative planting plan identifies 30 new trees to be planted in the roof gardens in Phase 2.



97. As well as providing significant landscape and amenity benefit, the planting proposals also form an integral part of the strategy for wind mitigation and will help create a more comfortable environment.
98. To further green the site, the two restaurant/café pavilion buildings will be topped with green roofs and a feature green wall will be installed rising the full height of the end of the Hatfields terrace and forming the backdrop for the escalators and lifts that will be used to access the public roof gardens.
99. Though indicative tree species are presented, the final species choices, planting specifications, management and maintenance arrangements will be secured by condition. Similarly, a planning condition is recommended to provide further technical details for the green roofs and green wall, including their irrigation and management arrangements.
100. The council's ecologist has confirmed that the Phase 1 habitat survey and bat survey are both acceptable and no further surveys are required. Planning conditions are recommended to ensure an appropriate range of habitat features are integrated into the building fabric.

Wind and microclimate

101. A wind assessment has been prepared to consider the changes that might occur should this development proceed. The assessment considers the wind conditions along the pavements on Paris Garden and Hatfields, at the entrances to the buildings and in the proposed garden and public realm spaces. The assessment concludes that with appropriate mitigation installed within the public realm and roof top gardens, such as planting, balustrades and canopies, a comfortable environment will be created. It is recommended that a detailed scheme of mitigation is reserved by planning condition.

Security measures

102. Southwark Plan policy 3.14 states that the private and public realm should be designed to improve community safety and crime prevention. The Metropolitan Police

confirm that the scheme should be able to achieve secured by design accreditation and state that should the scheme receive planning permission, they would welcome further dialogue in relation to the access to the public route, the management of and access to the roof gardens and general security measures around the site. It is recommended that a standard condition is included to require details of the full range of security measures to be implemented.

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

103. The application is accompanied by a comprehensive assessment on the impacts on amenity for neighbouring occupiers. Whilst a number of the impacts on daylight and sunlight exceed the guidance set out by the BRE, the nature of this central London location must be acknowledged and it is concluded that, on balance, the harm caused would not justify the refusal of planning permission.

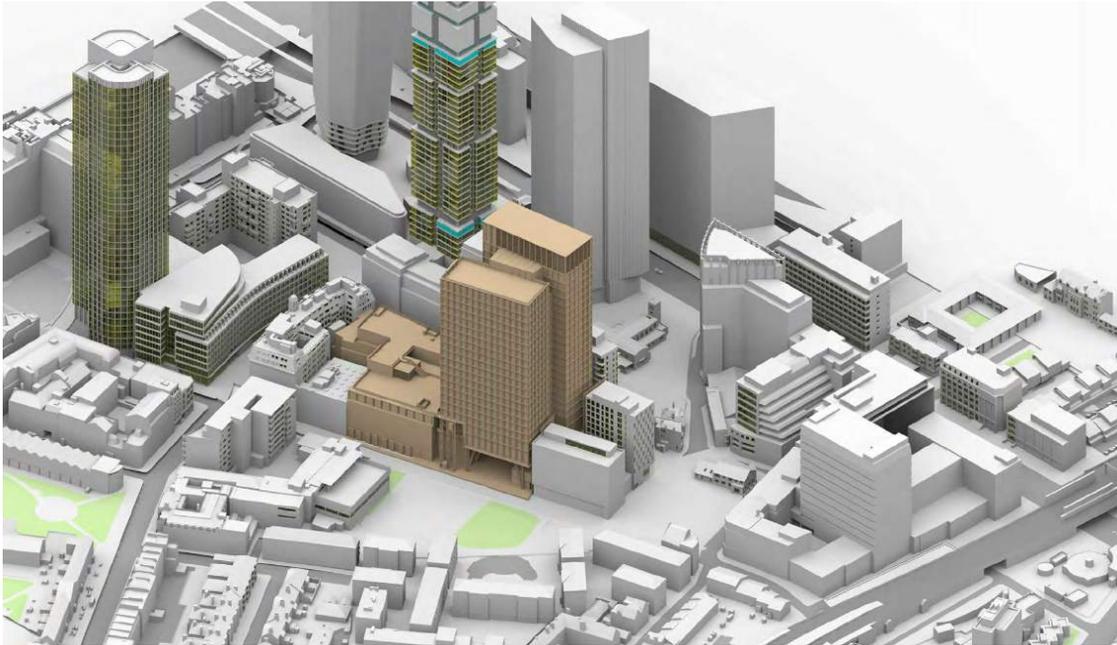
Overlooking and privacy

104. Opportunities for overlooking are limited in the existing condition given the absence of immediate neighbours on the opposite sides of Hatfields and Paris Garden. Given that a large proportion of the development is a refurbishment, the development itself does not create significant additional opportunities for overlooking; the façade designs remain largely the same and the rooftop extensions respect the existing building alignment or are set-back.
105. The recently consented scheme at 18 Blackfriars Road (16/AP/5239) will introduce a new frontage along the eastern side of Paris Garden comprising a new part 11/part 19 storey hotel and a 15 storey residential block, but the proposed development will respect the existing building line along Paris Garden and a separation distance in excess of the 12m stipulated in the Residential Design Standards (RDS) SPD will be maintained.
106. On Hatfields, the only immediate neighbour that is susceptible to overlooking is the London Nautical School though this is located opposite the listed buildings and the relationship between the two is already established. Though the roof gardens could create some opportunities for additional overlooking, the useable areas will be set-back behind a balustrade and a planted edge, which will limit any direct overlooking. The relationship at the lower floors remains unchanged. The Peabody Estate is located to the west, beyond Hatfields Green, though the separation distance between these homes and the proposed development is well in excess of the distances specified in the RDS SPD.
107. The new office tower will be largely glazed and so could increase the perception of overlooking, particularly in longer views afforded across open spaces, but direct views on the approaches from surrounding streets are limited.

Daylight, sunlight and overshadowing

108. Detailed testing has been undertaken to understand the daylight and sunlight impacts of the proposed development on neighbouring properties. The assessment has been carried out in accordance with the detailed guidelines set out by the Building Research

Establishment (BRE) and comprises the Vertical Sky Component (VSC) and Daylight and Distribution/No Sky Line tests for daylight, alongside consideration of the annual and winter sunlight hours and the potential overshadowing of buildings and open spaces. The assessments have been completed in several scenarios, including with Friars Bridge Court and 18 Blackfriars planning permissions in place and a 'no balcony' analysis. Reviewing the various scenarios provides a more informed view of the impact exerted by this development on neighbours.



Above: Daylight and sunlight model

109. The daylight assessment includes the neighbouring buildings shown in pink on the map below. An addendum report was also prepared to consider the impacts on the London Nautical School.



Vertical Sky Component Test

110. The VSC test simply considers the amount of daylight falling on the mid-point of a window. The existing and proposed values indicate how the obstruction created by the new building will impact on the level of daylight received. The BRE recommend a VSC level of 27% as representing a good level of daylight and set out that reductions of more than 20% will be noticeable to occupiers.

The VSC results can be summarised as follows:

Address	Total No. windows	Complies with VSC	Level of VSC reduction		
			20-29%	30-39%	40%>
18 Blackfriars (Affordable Block)	267	121 (45%)	1	2	143
18 Blackfriars (Residential Tower)	540	534 (99%)	6		
<i>18 Blackfriars is consented under 16/AP/5239 but the development is not yet implemented</i>					
6 Paris Garden (Student accommodation)	237	125 (53%)	31	43	38
57 Stamford Street	120	63 (53%)	44	7	6
56 Stamford Street	28	28 (100%)	-	-	-
49 Colombo Street	11	7 (64%)	-	2	2
47 Colombo Street (Rose & Crown Public House)	34	32 (94%)	-	-	2
London Nautical School	163	152 (93%)	3	5	3
Rennie Court	163	148 (91%)	-	5	10
Climsland House	45	18 (40%)	-	6	21
Peabody Estate	462	446 (97%)	16	-	-
235 & 340 Blackfriars	24	16	4	4	-
Quadrant House	3	3	-	-	-
Suthring House	32	32	-	-	-
Edward House	81	81	-	-	-

2-18 Nicholson Street	48	48	-	-	-
1 Aquinas Street	9	9	-	-	-
37-38 Aquinas Street	40	40	-	-	-
26 Broadwall	21	21	-	-	-
St Andrews House	11	11	-	-	-
South Bank Tower	827	827	-	-	-
One Blackfriars	30	30	-	-	-

No Sky Line/Daylight Distribution Test

111. The No Sky Line (NSL) test considers the proportion of a room from which the sky would be visible. Whereas the VSC test simply considers the daylight reaching the plane of the window, the NSL test takes the size of the window and the rooms that they serve into consideration. The BRE advise that where a development results in the NSL reducing by more than 20% it would be noticeable for occupiers.
112. Of the 1857 rooms tested, 1731 (93%) experience reductions of 20% or less, which would not be noticeable to residents. The majority of those that experience more significant reductions are within the affordable block that forms part of the 18 Blackfriars planning permission (46 rooms) and the student block immediately south of the development (32 rooms/studios).
113. Of the remaining properties, a much more limited number of rooms would experience reductions in the No Sky Line as follows:

Peabody Estate: 448 rooms tested, 420 comply (94%)
Rennie Court: 143 rooms tested, 140 comply (98%)
Climsland House: 45 rooms tested, 36 comply (80%)
57 Stamford Street: 81 rooms tested, 79 comply (98%)
St Andrews House: 11 rooms tested, 9 comply (82%)
London Nautical School: 74 rooms tested, 73 comply (99%)
47 Colombo Street: 15 rooms tested, 14 comply (93%)
49 Colombo Street: 6 rooms tested, 5 comply (83%)

The remaining properties, which are further from the application site, all achieve full compliance with the No Sky Line test.

Assessment of daylight impacts

114. The two daylight tests indicate that the properties that would experience the most noticeable impact are the as yet unbuilt affordable homes that form part of the 18 Blackfriars planning permission. To a lesser degree, the following properties would experience some windows that would not comply with the BRE guideline for VSC: 6

Paris Garden, 57 Stamford Street, Climsland House, the Peabody Estate, Rennie Court and the London Nautical School and 235-240 Blackfriars Road.

18 Blackfriars – Affordable Block

115. The main neighbour to experience a reduction in VSC levels is the consented affordable block immediately east of the site on Paris Garden. The presence of two large blocks across a narrow street makes some impact here inevitable. A similar level of impact is also borne out in the results of the No Sky Line (NSL) assessment.
116. Since the layouts are known and safe assumptions can be made around the initial decorative finish, a more detailed Average Daylight Factor (ADF) assessment can be completed for these units. The ADF test provides a better measure for determining the quality of light in a room. This assessment indicates that of the 51 living/kitchen/dining rooms tested, 27 rooms would exceed the BRE's recommended minimum for a living rooms (25 would meet the higher target for a kitchen). This indicates that the quality of light within these spaces will remain at a good standard. Only 9 of 51 bedrooms tested would achieve the recommended level, most likely due to the fact that they will be served by a single window facing the proposed development.
117. Clearly, the proposed development will have an adverse impact on the daylight received by these units, however, there are several factors that need to be considered alongside these results. The fact that the scheme is not built means that, presently, there are no occupiers who would actually perceive this loss of daylight. Secondly, the potential for a large-scale development on Paris Gardens was acknowledged by the developers of 18 Blackfriars Road at the time their scheme was being drawn up, and modelling was undertaken by the applicant in conjunction with the developer of the 18 Blackfriars scheme which identified that reconfiguring the internal layouts of the affordable units can result in more habitable rooms benefiting from improved daylight levels. To this end, the s106 agreement for the 18 Blackfriars schemes states:

"In the event that Paris Garden is granted planning permission prior to the implementation of the Affordable Housing Block, the Owner covenants to use all reasonable endeavours to reconfigure the Social Rented Units"

This option could be pursued to improve the daylight conditions for these units. It is further noted that the developer of the 18 Blackfriars Scheme has not objected to this proposal.

6 Paris Garden

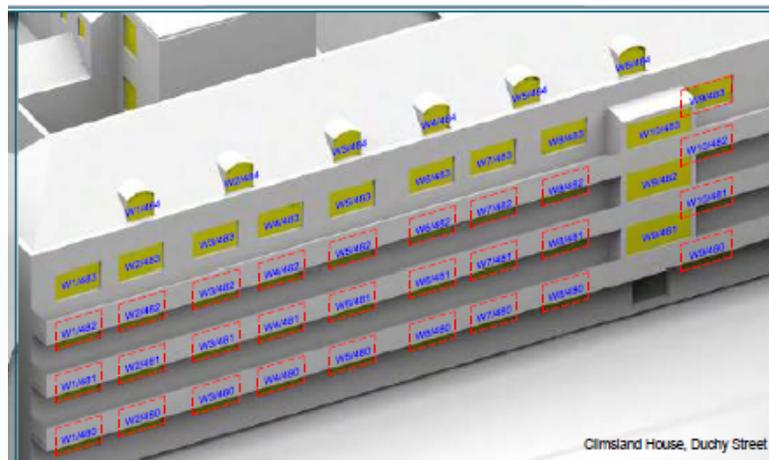
118. The proposed development abuts the northern end of the two student blocks and so will affect the daylight received on the internal faces of both buildings. The impacts here appear particularly severe as a result of the low VSC values in the existing context; where bedrooms on the lowest floors of accommodation do experience reductions in VSC, their existing values tend to be around 12% rather than the 27% advocated by the BRE. While the reductions in VSC levels do diminish the natural light received in these bedrooms, the transitory nature of the accommodation and the quality of communal spaces available to the student residents are material considerations which can be taken into account.

57 Stamford Street

119. 57 Stamford Street is very similar in that a number of windows have very low VSC levels in their existing condition due to large overhanging balconies, and the occupiers are likely to be more transitory given that the properties are let as serviced apartments. However, the affected rooms do benefit from large floor-to-ceiling windows and so the NSL test shows much greater compliance, with only 2 rooms experiencing reductions in excess of 20%.

Climsland House

120. 27 windows would experience reductions in excess of 20% and have a resulting VSC value of less than 27%, thus failing to comply with the BRE guidelines. However, all of these windows have an existing VSC of less than 3% in the existing condition due to them being located immediately beneath deck access walkways. With the existing VSC being very low, a very minor reduction appears quite large as a proportion (i.e. a 0.6 reduction would equate to 20%) but a reduction of this level is unlikely to be noticeable to occupiers.
121. In addition, analysis shows that if these decks are removed for the purposes of the analysis (an approach which is advocated within the BRE guidance) and the assessment completed, all but one window would comply with the BRE guideline. This demonstrates that the existing façade design of Climsland House is a much more significant factor in determining the amount of daylight received at these windows.



Peabody Estate

122. The VSC results demonstrate a very minor impact on the various buildings within the Peabody Estate. Only 16 windows do not comply with the BRE guideline and these windows largely experience reductions of between 20 and 21%.

Rennie Court

123. 15 of 163 windows would experience reductions in VSC in excess of 20%. These impacts relate to windows that are directly beneath overhanging balconies. When the daylight model is carried out omitting these balconies, the impacts would be fully

compliant with the BRE guidance. The No Sky Line test indicates that only 3 rooms would experience noticeable reductions in excess of 20%. This is considered to represent a minor impact.

Annual Probable Sunlight Hours (APSH)

124. The BRE guidelines set out that the impacts of development on neighbouring buildings should be considered where these neighbours have windows orientated within 90 degrees of south. The BRE set out that rooms that receive 25% of the available sunlight hours on an annual basis and 5% in winter will appear well-lit.
125. For the majority of properties, the impacts are either negligible or it is demonstrated that affected rooms would continue to receive annual and winter sunlight levels well in excess of the minimums recommended by the BRE. This is particularly the case for rooms tested along Colombo Street, Stamford Street and Blackfriars Road and at 57 Stamford Street. At the London Nautical School, a number of windows affected have been declared ancillary or circulation spaces and those that are assumed to be teaching spaces generally retain good levels of sunlight relative to the BRE guidelines.
126. The exception to this is the as yet unbuilt affordable block that forms part of the 18 Blackfriars planning permission. The sunlight assessment demonstrates mixed results, but undoubtedly some of the single aspect rooms facing Paris Garden will experience major reductions in annual and winter sunlight levels.
127. With the exception of some of the rooms in the neighbouring scheme, the sunlight assessment demonstrates that neighbouring properties will retain good levels of sunlight relative to the recommend guidelines of the BRE.

Overshadowing

128. A series of images are provided to demonstrate the overshadowing effect of the proposed development on neighbours and on nearby open spaces on 21 March, 21 June and 21 December. The assessment indicates that although the office tower will lead to some overshadowing, the shadows created will largely correspond to those already cast by existing and consented developments. The positioning of the building relative to Hatfields Green means that with the exception of some minor shadowing of the artificial MUGA in the early morning, the tower will have a negligible shadowing impact.

Solar Glare

129. Given that the tower façade comprises a large amount of glazing, an assessment of solar glare has been undertaken. The assessment states that the relatively tight-knit pattern of surrounding streets means that solar glare is unlikely to be experienced at street level where it might present a hazard to drivers. The modelling shows that the surrounding amenity spaces might experience some isolated events of glare, but that these would be brief and limited to certain conditions.

Daylight and sunlight conclusions

130. The daylight and sunlight assessment demonstrates that, with a few exceptions, the

development will lead to very modest reductions in the levels of daylight and sunlight received by neighbouring properties. In the majority of cases, rooms affected will continue to receive levels of daylight comparable with the levels recommended by the BRE or reductions would not be noticeable to occupiers. Some properties are hampered by their own design, which leads to low daylight levels in the existing condition. Given the location in the CAZ, where the pattern of development advocated in the development plan creates a more challenging environment for securing and retaining BRE compliant levels of daylight and sunlight, the results are considered to be good.

Noise

131. The potential for noise during construction and on occupation has been raised as a concern by some local residents. Noise during construction is unavoidable and will lead to some disruption, albeit temporarily. However, a construction management will be required and will need to demonstrate adherence to best practice in relation to demolition and construction, to establish working hours for noisy activities and to set out clear site management and monitoring principles that will collectively aim to reduce adverse impacts on local residents insofar as possible.
132. The new roof terraces will be subject to limitations on their hours of use to limit their potential to act as a source of noise late at night. Some concern has been raised about the potential for bars and restaurants to contribute to noise nuisance, but such uses would only be relatively small in scale and the location of the site within the central activities zone means that their inclusion within the scheme is supported. A noise condition is recommended that would require details of sound insulation measures to limit breakout of amplified music from any bars or restaurants.

Odour

133. The proposal includes potential restaurant space at ground floor level in both phases of the scheme, at third floor level in the office tower and in the roof garden pavilions. These uses could give rise to potential odour unless adequate ventilation and extraction systems are provided. The applicant has clarified that space has been provided that would allow any kitchen extract system to discharge above the level of roof gardens and pavilion buildings and that further mitigation can be incorporated within the office tower should any discharge at a higher level be required. The new retail facades will include high level louvres for the intake of fresh air only and will not in themselves compromise the street environment. It is recommended that further details of the extraction system can be secured by condition in the event that restaurant use is pursued.

External lighting

134. External lighting incorporated within the façade design of the tower or included within the roof gardens could impact on the amenity of neighbours and so it is recommended that a planning condition requires details to be provided in due course to demonstrate compliance with the guidelines established by the Institute of Lighting Professionals.

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

135. The existing buildings successfully operate as offices and are compatible with surrounding land uses. Other developments in the vicinity have been considered in developing the strategies for microclimate, servicing and highways design. Further detail is set out below.

Transport

136. The site has an 'Excellent' public transport rating, and provides levels of cycle parking which exceed the London Plan standards. Servicing and deliveries are accommodated within the site.

Location

137. The site benefits from excellent access to public transport, having a PTAL rating of 6b. Southwark Tube Station and Waterloo East Rail Station are within 250m and both Waterloo and Blackfriars Station roughly within 400m, all of which can be accessed within a 5min walk of the site. The site is also in the Bankside Controlled Parking Zone, which operates from 08:00 to 18:30 Monday to Friday and 09:30 to 12:30 on Saturdays.

Places, walking and cycling

138. The proposed development is modelled to double pedestrian trips in the morning and evening peak. A Pedestrian Comfort Level (PCL) assessment has been undertaken to consider the quality of the pedestrian environment. The assessment simply compares the number of anticipated pedestrian trips generated by development with the size of footway available to give a corresponding score for comfort. Here, consideration has been given to the cumulative impact of this scheme and the recently consented 18 Blackfriars development.
139. Paris Garden currently achieves the highest value of A+ (because of the limited pedestrian flows) but moves to 'C' in the cumulative scenario at peak times. This is described as being comparable with many Central London locations. This outcome is broadly replicated on Hatfields, with the exception of a series of pinch points where the existing lightwells restrict footpath width. However, the lightwells form part of the historic fabric of the listed buildings and their retention is considered important by Historic England. The creation of the new public route connecting Paris Gardens and Hatfields is particularly beneficial given this constraint. Comparatively, other approaches to the site such as Stamford Street or Blackfriars Road are of a much higher quality having received substantial investment in recent years.

Cycle parking

140. 789 cycle spaces are provided: 717 long-stay for employees and 72 short-stay for visitors. This level of provision is in excess of the minimum requirement that would be required to comply with London Plan Policy 6.9 (683 long stay and 72 short stay).
141. Long stay cycle parking is split between two large basement storage areas that have

direct lift access from Hatfields and the central public space beneath the tower. Storage options are split between two tier stackers 57% (60%), Sheffield stands (30%) and foldable cycle lockers 14% (10%). Both storage areas provide generous changing rooms and shower facilities to help encourage cycling.

142. This represents a high quality offer for cycle parking facilities, both in terms of the number and variety of storage options and the convenient routes between the street and the stores.
143. TfL note that the nearby cycle hire docking station is within the 10 most used in London and other nearby docking stations are within the top 25% in terms of their usage. A contribution of £50,000 has been requested in order to contribute towards the demand for cycle hire that the proposed development is likely to generate. This would be secured via the s106 agreement.

Servicing and deliveries

144. Servicing and deliveries are estimated to increase from 55 two-way trips to 165 two-way daily vehicle trips, with a peak of 16 trips per hour. The trip generation reflects the same assumptions used for the neighbouring 18 Blackfriars development. A breakdown of vehicle types suggests that these trips will comprise a mix of motorcycle, transit van and 7.5t box van deliveries.
145. Servicing activities will be focussed off-street and will utilise a combination of the existing single servicing lane, a new loading area accessed from Paris Garden and, occasionally, the new public route.
146. At present, a single servicing lane runs from an access point on Hatfields, through the site between the two listed buildings at lower ground level before exiting on Paris Gardens. This will be retained with some reorganisation of the immediately adjoining spaces to facilitate more efficient servicing and deliveries associated with the more intensive office and retail development above. A loading bay is provided directly off this route and is suitable for small van deliveries and the servicing lane also provides opportunities for very quick drop-offs and for vehicles to wait off-street, which is beneficial.
147. This will be supported by a new servicing yard accessed directly from Paris Gardens. This loading area is sized to accommodate 2x fixed axle box vans (i.e. not artics) and tracking diagrams show that these vehicles can enter and exit safely in a forward gear. The access to this area sits immediately adjacent to the exit from the internal servicing lane that bisects the site and leads to the creation of a 10m vehicle crossover on Paris Garden. An initial Stage 1 Road Safety Audit has been completed by the applicant and visibility splays have been provided to demonstrate that this access can operate without introducing potential conflicts. It is suggested that further detailed visibility splays are provided via condition as the façade details and public realm designs are progressed.
148. It is proposed that refuse collection takes place within the public realm. This would be subject to strict timing restrictions that will be established by planning condition to ensure that the benefits of providing a high quality public route are not negated by frequent refuse collection or other ad hoc servicing requirements. Bollards will prevent

vehicular access during the restricted hours.

149. Servicing and deliveries to the site will need to be carefully managed if on-street drop offs are to be avoided and a number of management principles are outlined in the draft Delivery and Service Management Plan (DSMP) that has been submitted, including that deliveries will be pre-booked. The principal access from Hatfields is relatively discreet and those accessing the site will need to be made aware of its location if it is to function effectively. This issue exists at present, though the proposal would generate a larger number of trips and so any adverse impacts could be exacerbated. A more detailed Delivery and Servicing Management Plan would be secured in the s106 agreement to more clearly define the management systems that will be implemented, including ways in which servicing and deliveries can be consolidated and the number of trips minimised.
150. To this end, a Delivery Service Plan Bond will be secured in the s106 agreement. The bond is calculated at a rate of £100 per 500sqm of floorspace and would be triggered in the event that the number of deliveries and/or servicing movements to the site exceeds the baseline set out in the Transport Statement – in this case 165 trips. The Bond would equate to £12,818 and if triggered would be invested in local transport infrastructure to mitigate the increased number of trips. Monitoring reports will be required on a quarterly basis for a period of 2 years from 75% occupation.

Car and motorcycle parking

151. The site is flanked by a number of pay and display parking bays and, on Paris Garden, a collection of motorcycle parking bays. The creation of the public route and the new loading area on the Paris Garden side of the development will lead to the loss of 27m of pay and display car parking- 10m on Paris Garden and 17m on Hatfields. This is roughly equivalent to 5 or 6 car parking spaces.
152. A parking beat survey following the Lambeth Methodology suggests that there is some spare capacity within local streets, and in Paris Garden and Hatfields in particular, and that this loss of kerbside parking will not lead to parking stress on local roads.
153. Two disabled parking bays for employees are proposed at basement level and they will be accessed via the existing servicing route that runs through the plot. The bays have sufficient manoeuvring space and adequate visibility. The level of provision is considered appropriate. In the event that additional blue badge parking is required, the parking beat survey reveals that some additional kerbside space is likely to be available.
154. The site is located within the Bankside Controlled Parking Zone and so occupiers of the commercial spaces will be exempted from applying for on-street parking permits. An obligation in the s106 agreement will make this clear.

Waste

155. The site will operate with a waste management strategy based on the principles of minimising waste, segregating different types of waste and employing sound management principles. A breakdown of anticipated general, recycling and food waste arising for each land use is detailed, with reference made to appropriate British

Standards.

156. Compactors for general and recycled waste will be installed for the new office in Phase 1 and these will be located adjacent within the ground floor refuse store that has direct access to the new public realm at the base of the building. The timing of access to this space for refuse collection will be strictly controlled by planning condition to avoid conflict with site users. A series of smaller refuse stores for the Phase 2 element are located at basement level immediately adjacent to the internal serving route and in close proximity to the loading bay. Daily collection has been assumed but the stores have been sized to provide 2-day capacity in order to provide some resilience against missed collections. The strategy provided demonstrates compliance with saved Southwark Plan policy 3.9 and it is recommended that final details of the waste management strategy are secured by condition.

Planning obligations (S.106 undertaking or agreement) and Community Infrastructure Levy (CIL)

157. The proposed development delivers a sizeable uplift in employment floorspace and as such requires a range of s106 planning obligations to mitigate the impacts of the development. The range of obligations has been determined in line with the council's s106 and CIL SPD as well as specific representations made by consultees. They include:

158. Employment

- Jobs, training and apprenticeship opportunities during construction;
- Job opportunities for unemployed Southwark residents in the final development;
- A employment and skills support plan to set out how these opportunities will be secured during construction and on completion;
- Local supply chain and procurement opportunities;
- A marketing strategy for the eventual commercial space to demonstrate that it is being marketed to a wide range of potential operators

159. Public realm and roof gardens

Management principles that address access to both of these space and, in the case of the roof gardens, establish the broad range of activities that are anticipated to take place here and hours of use. Obligations will make clear that the roof gardens are to be publically accessible at no expense to users and without any booking requirements.

160. Transport and highways

- Upgrade of existing crossing on Stamford Street to make this a signalised crossing;
- Highways improvements to Paris Garden and Hatfields including the repaving of footways for the full length of the immediately adjoining pavements up to the junction with Stamford Street;
- The installation of raised tables either side of the new public route beneath the office tower;
- Servicing and delivery management plan, including servicing bond;
- CPZ permit restrictions.

161. Phasing

An obligation will limit the full occupation of the Phase 1 office tower until such time as the phase 2 works have substantially commenced.

162. Energy

- Obligations to ensure that the scheme is future-proofed to allow connection to a wider heat network if one is delivered;
- Details of the photovoltaic panels and confirmation of the level of carbon reduction they deliver;

163. Financial payments

- Archaeology monitoring fee - £6,778
- Crossrail s106 contribution - £5,899,990
- Carbon offset payment - £72,727
- Cycle hire contribution - £50,000
- Servicing Bond - £12, 818
- Admin fee set at 2% of total contribution.

164. The above measures are necessary to make the proposed development acceptable in planning terms and failure to secure them in a s106 agreement would mean that the proposed development would fail to comply with Core Strategy Policy 14 'Implementation', saved Southwark Plan Policy 2.5 'Planning Obligations' and the council's associated supplementary planning document.

165. The site is also liable to pay both the Mayoral and Southwark Community Infrastructure Levy. Mayoral CIL is chargeable at £35 per sqm in Southwark and Southwark's CIL is charged at £76 per sqm for office (B1 use) and £136 per sqm for retail uses in this location. All charges are subject to indexation. However, the site's location within the Central Activities Zone means that the Mayoral CIL payment is superseded by a specific s106 contribution, as described in the Mayor's Crossrail SPG.

Sustainable development implications

Air quality

166. The air quality assessment considers whether levels of nitrogen dioxide (NO₂) or particulate matter (PM₁₀s) generated during demolition/construction or on occupation of the building will lead to adverse impacts within the vicinity of the site. Local testing suggests that the prevailing concentrations of NO₂ in the local area are generally above the national Objective Level and, coupled with the number of homes nearby, this makes the area highly sensitive. The assessment follows established Mayoral Guidance and the approach advocated by the Institute of Air Quality Management and sets out that the development poses a medium/high risk during demolition and construction. As such, a range of mitigation measures are proposed in relation to specific activities on site, site management and monitoring. Further details are provided in the outline Construction Environmental Management Plan and it is recommended that a more detailed document is secured via condition, once

contractors have been appointed to undertake the works. With appropriate mitigation measures in place, the assessment states that air quality impacts would not be significant. The risks presented by vehicular movements and the CHP plant on occupation of the buildings are deemed to be negligible and no further mitigation is proposed at that stage. As required by the London Plan, an Air Quality Neutral Statement has been provided to demonstrate that the scheme achieves this standard.

167. The report has been reviewed by the council's environmental protection team and a condition is recommended that will secure details of the technical specification of the CHP Plant prior to occupation, to confirm the assumptions made in the assessment.

Contamination

168. A Phase 1 desk-based report has been completed to consider the potential for contaminants to be present on site. The report notes that historical land uses in the area might lead to some contaminants being present in the made ground and/or groundwater. A standard condition is recommended that will require further site investigations in due course and the submission of a strategy to deal with any contaminants identified on site. The risks of contamination are largely related to the construction phase given that there is an absence of soft landscaping at ground level and very limited opportunity for site users to come into contact with any contaminated land once development is completed.

Energy and sustainability

169. A detailed energy assessment sets out how the development will reduce carbon emissions via a combination of passive design measures, clean energy supply and renewable energy technology, as required by the London Plan. The assessment sets out that the new office building will achieve a 35% saving in regulated carbon dioxide emissions relative to a Building Regulations compliant scheme, but that the refurbished listed buildings would only achieve a 28% saving in Regulated carbon emissions. Overall, this amounts to a saving of 32.3% and so a financial contribution of £72,727 is required to bridge the gap to the 35% stipulated in London Plan policy 5.2. The strategy also includes the installation of 380sqm PV panels on the southern façade of the office tower, further details of which will be required by condition or obligation.
170. This strategy represents an improvement on the original submission as a result of the two phases now being connected to form a single heat network powered by a larger CHP system. This has enabled an increase in carbon reduction for Phase 2 specifically. This reflects comments made by GLA, who have since confirmed that the approach is now acceptable.
171. BREEAM Pre-Assessments have been provided for both elements of the scheme and indicate that the new build element can comfortably achieve BREEAM "Excellent" and the refurbished listed buildings BREEAM "Very Good". In both cases, the pre-assessment identifies additional credits that could deliver a better sustainability outcome. The Core Strategy sets a target of BREEAM Excellent for large scale commercial proposals and this will be reflected in a planning condition.

Flood risk and drainage

172. The proximity to the Thames means that the site is located in Flood Zone 3 and classified as at high risk of flooding. As such, a site-specific flood risk assessment has been prepared to assess the risk of flooding. The site is protected by the Thames Tidal Defences, however, scenario testing has been presented to show that the site would be susceptible to flooding at ground and basement level should these defences fail in an extreme storm event. This is the case for much of the north of the borough.
173. In such cases, the NPPF sets out that less vulnerable uses should be located in areas of flood risk, that flood resilience and sustainable drainage measures should be incorporated within schemes, that residual risks can be managed and that safe access is available. All of these criteria are satisfied in this instance. Office and retail uses are categorised as 'less vulnerable' uses and the spaces allocated to the basement are predominantly ancillary storage and plant areas. Where useable space is provided, it is located in close proximity to staircases that would provide easy access to areas above the modelled flood level.
174. The council's flood risk and drainage team acknowledge that the new build office will reduce surface water runoff to an acceptable level through the incorporation of a 140 cubic metre attenuation tank. Additional attenuation will be achieved via the roof gardens. Detailed conditions are recommended to confirm the extent and specification of the sustainable drainage measures, to provide details of flood resilience measures in response to potential fluvial and groundwater flooding and to confirm details of a flood evacuation plan.

Other matters

5 year permission

175. Section 91 of the Town and Country Planning Act (as amended) sets out that default time period for implementing a planning permission is 3 years, but local planning authorities may stipulate another period if material considerations suggest it is appropriate to do so.
176. The existing offices are currently occupied and in the case of the listed buildings the largest lease runs until 2023, at the earliest. The applicant has indicated that they would need to seek a development partner in order to deliver the scheme. It is considered that the commercial practicalities of the site suggest that a longer window of 5 years would be reasonable and would provide greater opportunity for the scheme in its entirety to be delivered as a coherent single development.

TV interference

177. Paragraph 114 of the NPPF states that planning authorities should consider the impact of development on broadcast and electronic communications services and this is echoed in London Plan policy 7.7.
178. The submitted report identifies 3x properties that might experience an impact to terrestrial TV reception and 2x that might experience an impact on satellite TV reception. For the very small number of properties that might experience some

disruption to their satellite signal, the report recommends that relocation of dishes would adequately address this impact. As such, a condition is recommended that will require the developer take action should these impacts materialise. Modelling suggests no adverse impacts to mobile phone reception or digital radio as a result of the development.

Utilities

179. Thames Water's formal response to the proposal stated that there was insufficient capacity in the sewerage network to cope with the development. Subsequently the applicant has provided further detail on their proposed drainage strategy including the surface water runoff rates to different connection points around the site and Thames Water have confirmed that this level of detail overcomes their initial concerns.
180. The site currently contains 3x substations, though investigations have revealed that they do not have capacity to supply this more intensive development. As a result, new substations will be incorporated in to the scheme and discussions are ongoing with UK Power Networks to finalise technical design.

Archaeology

181. The site is not located within a designated Archaeological Priority Zone but prevailing guidance sets out that for sites with a footprint in excess of 0.5 hectares, investigations should be undertaken to determine whether archaeological remains are present. Having reviewed the submitted Desk Based Assessment, the council's archaeologist has recommended a series of planning conditions to cover the archaeological evaluation, mitigation, reporting and recording.

Conclusion on planning issues

182. The proposed development will deliver a high quality, flexible office environment in an area where such development is identified as a strategic need. The creation of office floorspace, capable of attracting major occupiers, and the inclusion of retail frontages to streets which current lack active frontages, are clear benefits of the scheme, and consistent with the draft site designation in the NSP. The architectural form and height of the main office tower is supported and will complement the emerging tall building cluster, without competing with the tallest towers and without causing unacceptable levels of harm to the amenity of neighbours. The sensitive refurbishment and extension of the listed buildings, including the creation of landscaped roof gardens, delivers significant public benefit that outweighs any harm that could be considered to arise due to interventions in the historic fabric of these buildings. As a result of design changes secured at basement, ground and roof level, Historic England have withdrawn their initial objection to the Listed Building Consent application. A s106 agreement and a number of planning conditions are recommended to ensure that the impacts of the development can be adequately mitigated and to provide opportunities for the quality of the scheme to be demonstrated as the detailed design progresses. Subject to these measures, it is recommended that planning permission and listed building consent are granted; the planning permission would be subject to referral to the Mayor for London.

Community Impact and Equalities Assessment

183. 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.

184. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

185. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.

186. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. Through the provision of more inclusive access to all elements of the scheme, the creation of roof gardens that will provide opportunity for social interaction and the creation of a significant number of varied employment opportunities, it is considered that the proposed development will have a positive impact on the above groups.

Consultations

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

Consultation replies

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

Summary of consultation responses

Objections from local residents, neighbourhood groups, internal and external consultees are summarised in paragraphs 35 to 40. The issued raised have been

assessed in the relevant sections of the report.

Human rights implications

189. 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.
190. This application has the legitimate aim of providing details of a office-led, mixed use development including the refurbishment and extension of several listed buildings. 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/1234-B Application file: 17/AP/4230 Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing 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 1249 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken – Full planning application
Appendix 2	Consultation responses received – Full planning application
Appendix 3	Consultation undertaken – Listed building consent
Appendix 4	Consultation responses received – Listed building consent
Appendix 5	Recommendation – Full planning application
Appendix 6	Recommendation – Listed building consent

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning	
Report Author	Michael Glasgow	
Version	Final	
Dated	7 December 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 of Housing and Modernisation	No	No
Date final report sent to Constitutional Team		7 December 2018

APPENDIX 1

Consultation undertaken on planning application 17/AP/4230

Site notice date: 22/01/2018

Press notice date: 18/01/2018

Case officer site visit date: n/a

Neighbour consultation letters sent: 31/01/2018

Internal services consulted:

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

Statutory and non-statutory organisations consulted:

Arqiva - digital communications
City Of London
Cllr A Morris
Cllr Maria Linforth-Hall
Cllr Noakes
Council for British Archaeology
EDF Energy
Environment Agency
Greater London Authority
Historic England
London Ambulance Service NHS Trust
London Borough of Lambeth
London Fire & Emergency Planning Authority
Metropolitan Police Service (Designing out Crime)
Peabody, 45 Westminster Road
South Bank Business Improvement District, Elizabeth House
Thames Water - Development Planning
The Victorian Society
Twentieth Century Society
Waterloo Quarter BID, Build Studios

Neighbour and local groups consulted:

Pg 49 6 Paris Garden SE1 8DJ
Pg 48 6 Paris Garden SE1 8DJ
Pg 50 6 Paris Garden SE1 8DJ
Pg 52 6 Paris Garden SE1 8DJ

46 Blackfriars Road London SE1 8NZ
Basement And Ground Floor Dorset House SE1 9NT
49 Blackfriars Road London SE1 8NZ
Apartment 1409 55 Upper Ground SE1 9EY

Pg 51 6 Paris Garden SE1 8DJ
Pg 44 6 Paris Garden SE1 8DJ
Pg 43 6 Paris Garden SE1 8DJ
Pg 45 6 Paris Garden SE1 8DJ
Pg 47 6 Paris Garden SE1 8DJ
Pg 46 6 Paris Garden SE1 8DJ
Pg 59 6 Paris Garden SE1 8DJ
Pg 58 6 Paris Garden SE1 8DJ
Pg 60 6 Paris Garden SE1 8DJ
Pg 62 6 Paris Garden SE1 8DJ
Pg 61 6 Paris Garden SE1 8DJ
Pg 54 6 Paris Garden SE1 8DJ
Pg 53 6 Paris Garden SE1 8DJ
Pg 55 6 Paris Garden SE1 8DJ
Pg 57 6 Paris Garden SE1 8DJ
Pg 56 6 Paris Garden SE1 8DJ
Pg 29 6 Paris Garden SE1 8DJ
Pg 28 6 Paris Garden SE1 8DJ
Pg 30 6 Paris Garden SE1 8DJ
Pg 32 6 Paris Garden SE1 8DJ
Pg 31 6 Paris Garden SE1 8DJ
Pg 24 6 Paris Garden SE1 8DJ
Pg 23 6 Paris Garden SE1 8DJ
Pg 25 6 Paris Garden SE1 8DJ
Pg 27 6 Paris Garden SE1 8DJ
Pg 26 6 Paris Garden SE1 8DJ
Pg 39 6 Paris Garden SE1 8DJ
Pg 38 6 Paris Garden SE1 8DJ
Pg 40 6 Paris Garden SE1 8DJ
Pg 42 6 Paris Garden SE1 8DJ
Pg 41 6 Paris Garden SE1 8DJ
Pg 34 6 Paris Garden SE1 8DJ
Pg 33 6 Paris Garden SE1 8DJ
Pg 35 6 Paris Garden SE1 8DJ
Pg 37 6 Paris Garden SE1 8DJ
Pg 36 6 Paris Garden SE1 8DJ
Unit 207 Enterprise House SE1 9PG
Units 205 And 206 Enterprise House SE1 9PG
Unit 503 Enterprise House SE1 9PG
1 Paris Garden London SE1 8NU
Unit B11a Enterprise House SE1 9PG
Third Floor Dominican Court SE1 8DJ
Second Floor Dominican Court SE1 8DJ
Pro Insight Colombo Centre SE1 8DP
Part Second Floor East Friars Bridge Court SE1 8NZ
Part Second Floor West Friars Bridge Court SE1 8NZ
25 Blackfriars Road London SE1 8NY
19-23 Blackfriars Road London SE1 8ER
27 Blackfriars Road SE1 8NY
Colombo Centre 34-68 Colombo Street SE1 8DP
19 Hatfields London SE1 8DJ
49 Colombo Street London SE1 8DP
Wedge House 36 Blackfriars Road SE1 8PB
Dominican Court 17 Hatfields SE1 8DJ
Franciscan Court 16 Hatfields SE1 8DJ
34 Blackfriars Road London SE1 8NZ
Pg 69 6 Paris Garden SE1 8DJ
Pg 68 6 Paris Garden SE1 8DJ
Pg 70 6 Paris Garden SE1 8DJ
Pg 72 6 Paris Garden SE1 8DJ
Pg 71 6 Paris Garden SE1 8DJ

Pg 64 6 Paris Garden SE1 8DJ
Pg 63 6 Paris Garden SE1 8DJ
Pg 65 6 Paris Garden SE1 8DJ
Pg 67 6 Paris Garden SE1 8DJ

Pg 66 6 Paris Garden SE1 8DJ
Pg 0 6 Paris Garden SE1 8DJ
Pg 78 6 Paris Garden SE1 8DJ

Apartment 1408 55 Upper Ground SE1 9EY
Apartment 1410 55 Upper Ground SE1 9EY
Apartment 1501 55 Upper Ground SE1 9EY
Apartment 1411 55 Upper Ground SE1 9EY
Apartment 1404 55 Upper Ground SE1 9EY
Apartment 1403 55 Upper Ground SE1 9EY
Apartment 1405 55 Upper Ground SE1 9EY
Apartment 1407 55 Upper Ground SE1 9EY
Apartment 1406 55 Upper Ground SE1 9EY
Apartment 1508 55 Upper Ground SE1 9EY
Apartment 1507 55 Upper Ground SE1 9EY
Apartment 1509 55 Upper Ground SE1 9EY
Apartment 1511 55 Upper Ground SE1 9EY
Apartment 1510 55 Upper Ground SE1 9EY
Apartment 1503 55 Upper Ground SE1 9EY
Apartment 1502 55 Upper Ground SE1 9EY
Apartment 1504 55 Upper Ground SE1 9EY
Apartment 1506 55 Upper Ground SE1 9EY
Apartment 1505 55 Upper Ground SE1 9EY
Apartment 1211 55 Upper Ground SE1 9EY
Apartment 1210 55 Upper Ground SE1 9EY
Apartment 1301 55 Upper Ground SE1 9EY
Apartment 1303 55 Upper Ground SE1 9EY
Apartment 1302 55 Upper Ground SE1 9EY
Apartment 1206 55 Upper Ground SE1 9EY
Apartment 1205 55 Upper Ground SE1 9EY
Apartment 1207 55 Upper Ground SE1 9EY
Apartment 1209 55 Upper Ground SE1 9EY
Apartment 1208 55 Upper Ground SE1 9EY
Apartment 1310 55 Upper Ground SE1 9EY
Apartment 1309 55 Upper Ground SE1 9EY
Apartment 1311 55 Upper Ground SE1 9EY
Apartment 1402 55 Upper Ground SE1 9EY
Apartment 1401 55 Upper Ground SE1 9EY
Apartment 1305 55 Upper Ground SE1 9EY
Apartment 1304 55 Upper Ground SE1 9EY
Apartment 1306 55 Upper Ground SE1 9EY
Apartment 1308 55 Upper Ground SE1 9EY
Apartment 1307 55 Upper Ground SE1 9EY
Second Floor 52-54 Stamford Street SE1 9LX
Ground Floor 18 Hatfields SE1 8GN
Lower Ground Floor 18 Hatfields SE1 8GN
First Floor 18 Hatfields SE1 8GN
Second To Fourth Floor Rennie House SE1 8DL
Ground Floor 52-54 Stamford Street SE1 9LY
Third Floor 52-54 Stamford Street SE1 9LY
Basement 52-54 Stamford Street SE1 9LX
Unit 305 To 305a Enterprise House SE1 9PG
Unit 8 Basement Enterprise House SE1 9PQ
Second Floor And Third Floor 18 Hatfields SE1 8GN
Flat 12a 25 Broadwall SE1 9PS
Unit 507 Enterprise House SE1 9PG
Unit 401 Enterprise House SE1 9PG
Unit 403 Enterprise House SE1 9PG
Unit 402 Enterprise House SE1 9PG
Part Third Floor Rennie House SE1 8DL
Ground And First Floor Rennie House SE1 8DL
Unit 503 Enterprise House SE1 9PG
Unit 502 Enterprise House SE1 9PG
Unit 501 Enterprise House SE1 9PG
Basement Ground First To Third Floors Sungard Court
Sungard Court SE1 8ND
Third Floor Broadwall House SE1 9PL
Fourth Floor Sungard Court SE1 8ND
Unit B5 Enterprise House SE1 9PQ
Part Basement And Ground Floor 58-60 Stamford Street SE1
9LX
Sixth Floor And Seventh Floor Friars Bridge Court SE1 8NZ
Part Ground Floor Railtrack Friars Bridge Court SE1 8NZ
Basement Broadwall House SE1 9PL

15-25 Paris Garden London SE1 8DL
Basement Ground And First Floors Dominican Court SE1 8DJ
33 Hatfields London SE1 8DJ
Pg 74 6 Paris Garden SE1 8DJ
Pg 73 6 Paris Garden SE1 8DJ
Pg 75 6 Paris Garden SE1 8DJ
Pg 77 6 Paris Garden SE1 8DJ
Pg 76 6 Paris Garden SE1 8DJ
Pg 22 6 Paris Garden SE1 8DJ

H 52 6 Paris Garden SE1 8DJ
H 51 6 Paris Garden SE1 8DJ
H 53 6 Paris Garden SE1 8DJ
H 55 6 Paris Garden SE1 8DJ
H 54 6 Paris Garden SE1 8DJ
H 47 6 Paris Garden SE1 8DJ
H 46 6 Paris Garden SE1 8DJ
H 48 6 Paris Garden SE1 8DJ
H 50 6 Paris Garden SE1 8DJ
H 49 6 Paris Garden SE1 8DJ
H 62 6 Paris Garden SE1 8DJ
H 61 6 Paris Garden SE1 8DJ

H 63 6 Paris Garden SE1 8DJ
H 65 6 Paris Garden SE1 8DJ
H 64 6 Paris Garden SE1 8DJ
H 57 6 Paris Garden SE1 8DJ
H 56 6 Paris Garden SE1 8DJ
H 58 6 Paris Garden SE1 8DJ
H 60 6 Paris Garden SE1 8DJ

H 59 6 Paris Garden SE1 8DJ
H 32 6 Paris Garden SE1 8DJ
H 31 6 Paris Garden SE1 8DJ
H 33 6 Paris Garden SE1 8DJ
H 35 6 Paris Garden SE1 8DJ
H 34 6 Paris Garden SE1 8DJ
H 27 6 Paris Garden SE1 8DJ
H 26 6 Paris Garden SE1 8DJ
H 28 6 Paris Garden SE1 8DJ
H 30 6 Paris Garden SE1 8DJ
H 29 6 Paris Garden SE1 8DJ
H 42 6 Paris Garden SE1 8DJ
H 41 6 Paris Garden SE1 8DJ
H 43 6 Paris Garden SE1 8DJ
H 45 6 Paris Garden SE1 8DJ
H 44 6 Paris Garden SE1 8DJ
H 37 6 Paris Garden SE1 8DJ
H 36 6 Paris Garden SE1 8DJ
H 38 6 Paris Garden SE1 8DJ
H 40 6 Paris Garden SE1 8DJ
H 39 6 Paris Garden SE1 8DJ
Pg 8 6 Paris Garden SE1 8DJ
Pg 7 6 Paris Garden SE1 8DJ
Pg 9 6 Paris Garden SE1 8DJ
Pg 11 6 Paris Garden SE1 8DJ
Pg 10 6 Paris Garden SE1 8DJ
Pg 3 6 Paris Garden SE1 8DJ
Pg 2 6 Paris Garden SE1 8DJ
Pg 4 6 Paris Garden SE1 8DJ
Pg 6 6 Paris Garden SE1 8DJ
Pg 5 6 Paris Garden SE1 8DJ
Pg 18 6 Paris Garden SE1 8DJ
Pg 17 6 Paris Garden SE1 8DJ
Pg 19 6 Paris Garden SE1 8DJ
Pg 21 6 Paris Garden SE1 8DJ
Pg 20 6 Paris Garden SE1 8DJ
Pg 13 6 Paris Garden SE1 8DJ
Pg 12 6 Paris Garden SE1 8DJ
Pg 14 6 Paris Garden SE1 8DJ

Second Floor Broadwall House SE1 9PL
Personal Search
Second Floor Bastille Court SE1 8ND
Third To Fourth Floor Friars Bridge Court SE1 8NZ
Third Floor Bastille Court SE1 8ND
First Floor 52-54 Stamford Street SE1 9LX
Versailles Court 3 Paris Garden SE1 8ND
First Floor 27 Broadwall SE1 9PL
Units 1 And 4 And Unit 3 Basement Enterprise House SE1 9PQ
Ground Floor 27 Broadwall SE1 9PL
Fourth Floor Bastille Court SE1 8ND
Part Fifth Floor Kitchen Friars Bridge Court SE1 8NZ
First Floor Thameslink Friars Bridge Court SE1 8NZ
Part Fifth Floor Friars Bridge Court SE1 8NZ
Unit 307 Enterprise House SE1 9PG
Fifth Floor Friars Bridge Court SE1 8NZ
Unit 306 Enterprise House SE1 9PG
Unit 304 Enterprise House SE1 9PG
Eighth Floor Friars Bridge Court SE1 8NZ
Part First Floor West Friars Bridge Court SE1 8NZ
Part Ground Floor Connex Southern Eastern Friars Bridge Court SE1 8NZ
Flat 2 56 Stamford Street SE1 9LX
Flat 1 56 Stamford Street SE1 9LX
Flat 3 56 Stamford Street SE1 9LX
Flat 6 56 Stamford Street SE1 9LX
Flat 5 56 Stamford Street SE1 9LX
First Floor To Fourth Floor 58-60 Stamford Street SE1 9LX
Part Basement And Part Ground Floor 58-60 Stamford Street SE1 9LX
Unit 107 Enterprise House SE1 9PG
Living Accommodation 25 Stamford Street SE1 9NT
Flat 4 56 Stamford Street SE1 9LX
Unit 411 Enterprise House SE1 9PG
Unit 410 Enterprise House SE1 9PG
Unit 504 Enterprise House SE1 9PG
Unit 506 Enterprise House SE1 9PG
Unit 505 Enterprise House SE1 9PG
Unit 405 Enterprise House SE1 9PG
Unit 404 Enterprise House SE1 9PG
Unit 406 To Unit 407 Enterprise House SE1 9PG
Unit 409 Enterprise House SE1 9PG
Unit 408 Enterprise House SE1 9PG
Unit 102 Enterprise House SE1 9PG
Unit 101 Enterprise House SE1 9PG
Unit 301 Enterprise House SE1 9PG
Unit 303 Enterprise House SE1 9PG
Unit 302 Enterprise House SE1 9PG
Unit 201 Enterprise House SE1 9PG
Unit 508 Enterprise House SE1 9PG
Unit 202 Enterprise House SE1 9PG
Unit B04 Enterprise House SE1 9PG
Unit 509 Enterprise House SE1 9PG
Apartment 3102 55 Upper Ground SE1 9RB
Apartment 3101 55 Upper Ground SE1 9RB
Apartment 3103 55 Upper Ground SE1 9RB
Apartment 3105 55 Upper Ground SE1 9RB
Apartment 3104 55 Upper Ground SE1 9RB
Apartment 3003 55 Upper Ground SE1 9RB
Apartment 3002 55 Upper Ground SE1 9RB
Apartment 3004 55 Upper Ground SE1 9RB
Apartment 3006 55 Upper Ground SE1 9RB
Apartment 3005 55 Upper Ground SE1 9RB
Apartment 3206 55 Upper Ground SE1 9HE
Apartment 3205 55 Upper Ground SE1 9HE
Apartment 3401 55 Upper Ground SE1 9HE
Apartment 3403 55 Upper Ground SE1 9HE
Apartment 3402 55 Upper Ground SE1 9HE
Apartment 3201 55 Upper Ground SE1 9HE

Pg 16 6 Paris Garden SE1 8DJ
Pg 15 6 Paris Garden SE1 8DJ
H 72 6 Paris Garden SE1 8DJ
H 71 6 Paris Garden SE1 8DJ
H 73 6 Paris Garden SE1 8DJ
H 75 6 Paris Garden SE1 8DJ
H 74 6 Paris Garden SE1 8DJ
H 67 6 Paris Garden SE1 8DJ
H 66 6 Paris Garden SE1 8DJ
H 68 6 Paris Garden SE1 8DJ
H 70 6 Paris Garden SE1 8DJ
H 69 6 Paris Garden SE1 8DJ
H 82 6 Paris Garden SE1 8DJ
H 81 6 Paris Garden SE1 8DJ
H 83 6 Paris Garden SE1 8DJ
Pg 1 6 Paris Garden SE1 8DJ
H 84 6 Paris Garden SE1 8DJ
H 77 6 Paris Garden SE1 8DJ
H 76 6 Paris Garden SE1 8DJ
H 78 6 Paris Garden SE1 8DJ
H 80 6 Paris Garden SE1 8DJ
H 79 6 Paris Garden SE1 8DJ
Flat 96 Rennie Court SE1 9NZ
Flat 95 Rennie Court SE1 9NZ
Flat 97 Rennie Court SE1 9NZ
Flat 99 Rennie Court SE1 9NZ
Flat 98 Rennie Court SE1 9NZ
Flat 91 Rennie Court SE1 9NZ
Flat 90 Rennie Court SE1 9NZ
Flat 92 Rennie Court SE1 9NZ
Flat 94 Rennie Court SE1 9NZ
Flat 93 Rennie Court SE1 9NZ
14 Milroy Walk London SE1 9LW
5 Milroy Walk London SE1 9LW
1 Milroy Walk London SE1 9LW
The Mad Hatter 3-7 Stamford Street SE1 9NY
4 Milroy Walk London SE1 9LW
1 Stamford Street London SE1 9NT
Unit 1 23 Broadwall SE1 9PL
56 Stamford Street London SE1 9LX
The Stamford Arms 62 Stamford Street SE1 9LX
Flat 76 Rennie Court SE1 9NZ
Flat 75 Rennie Court SE1 9NZ
Flat 77 Rennie Court SE1 9NZ
Flat 79 Rennie Court SE1 9NZ
Flat 78 Rennie Court SE1 9NZ
Flat 71 Rennie Court SE1 9NZ
Flat 70 Rennie Court SE1 9NZ
Flat 72 Rennie Court SE1 9NZ
Flat 74 Rennie Court SE1 9NZ
Flat 73 Rennie Court SE1 9NZ
Flat 86 Rennie Court SE1 9NZ
Flat 85 Rennie Court SE1 9NZ
Flat 87 Rennie Court SE1 9NZ
Flat 89 Rennie Court SE1 9NZ
Flat 88 Rennie Court SE1 9NZ
Flat 81 Rennie Court SE1 9NZ
Flat 80 Rennie Court SE1 9NZ
Flat 82 Rennie Court SE1 9NZ
Flat 84 Rennie Court SE1 9NZ
Flat 83 Rennie Court SE1 9NZ
Units 6 And 6a Enterprise House SE1 9PQ
Unit 7 Basement Enterprise House SE1 9PQ
3 Enterprise House 59-65 Upper Ground SE1 9PQ
5a Enterprise House 59-65 Upper Ground SE1 9PQ
5 Enterprise House 59-65 Upper Ground SE1 9PQ
Wakefield House 9-11 Stamford Street SE1 9NT
Part First Floor Chadwick Court SE1 8DJ
23 Stamford Street London SE1 9NT
Unit 4 Basement Enterprise House SE1 9PQ

Apartment 3106 55 Upper Ground SE1 9RB
Apartment 3202 55 Upper Ground SE1 9HE
Apartment 3204 55 Upper Ground SE1 9HE
Apartment 3203 55 Upper Ground SE1 9HE
Apartment 2706 55 Upper Ground SE1 9RB
Apartment 2705 55 Upper Ground SE1 9RB
Apartment 2801 55 Upper Ground SE1 9RB
Apartment 2803 55 Upper Ground SE1 9RB
Apartment 2802 55 Upper Ground SE1 9RB
Apartment 2701 55 Upper Ground SE1 9RB
Apartment 2606 55 Upper Ground SE1 9RB
Apartment 2702 55 Upper Ground SE1 9RB
Apartment 2704 55 Upper Ground SE1 9RB
Apartment 2703 55 Upper Ground SE1 9RB
Apartment 2904 55 Upper Ground SE1 9RB
Apartment 2903 55 Upper Ground SE1 9RB
Apartment 2905 55 Upper Ground SE1 9RB
Apartment 3001 55 Upper Ground SE1 9RB
Apartment 2906 55 Upper Ground SE1 9RB
Apartment 2805 55 Upper Ground SE1 9RB
Apartment 2804 55 Upper Ground SE1 9RB
Apartment 2806 55 Upper Ground SE1 9RB
Apartment 2902 55 Upper Ground SE1 9RB
Apartment 2901 55 Upper Ground SE1 9RB
H 12 6 Paris Garden SE1 8DJ
H 11 6 Paris Garden SE1 8DJ
H 13 6 Paris Garden SE1 8DJ
H 15 6 Paris Garden SE1 8DJ
H 14 6 Paris Garden SE1 8DJ
H 7 6 Paris Garden SE1 8DJ
H 6 6 Paris Garden SE1 8DJ
H 8 6 Paris Garden SE1 8DJ
H 10 6 Paris Garden SE1 8DJ
H 9 6 Paris Garden SE1 8DJ
H 22 6 Paris Garden SE1 8DJ
H 21 6 Paris Garden SE1 8DJ
H 23 6 Paris Garden SE1 8DJ
H 25 6 Paris Garden SE1 8DJ
H 24 6 Paris Garden SE1 8DJ
H 17 6 Paris Garden SE1 8DJ
H 16 6 Paris Garden SE1 8DJ
H 18 6 Paris Garden SE1 8DJ
H 20 6 Paris Garden SE1 8DJ
H 19 6 Paris Garden SE1 8DJ
Apartment 3604 55 Upper Ground SE1 9HE
Apartment 3603 55 Upper Ground SE1 9HE
Apartment 3701 55 Upper Ground SE1 9HE
Apartment 3801 55 Upper Ground SE1 9HE
Apartment 3702 55 Upper Ground SE1 9HE
Apartment 3405 55 Upper Ground SE1 9HE
Apartment 3404 55 Upper Ground SE1 9HE
Apartment 3406 55 Upper Ground SE1 9HE
Apartment 3602 55 Upper Ground SE1 9HE
Apartment 3601 55 Upper Ground SE1 9HE
H 2 6 Paris Garden SE1 8DJ
H 1 6 Paris Garden SE1 8DJ
H 3 6 Paris Garden SE1 8DJ
H 5 6 Paris Garden SE1 8DJ
H 4 6 Paris Garden SE1 8DJ
Apartment 3803 55 Upper Ground SE1 9HE
Apartment 3802 55 Upper Ground SE1 9HE
Apartment 3901 55 Upper Ground SE1 9HE
Apartment 4001 55 Upper Ground SE1 9HE
Apartment 3902 55 Upper Ground SE1 9HE
Apartment 2605 55 Upper Ground SE1 9RB
Apartment 1807 55 Upper Ground SE1 9EY
Apartment 1806 55 Upper Ground SE1 9EY
Apartment 1808 55 Upper Ground SE1 9EY
Apartment 1810 55 Upper Ground SE1 9EY
Apartment 1809 55 Upper Ground SE1 9EY

Unit 2 Enterprise House SE1 9PQ	Apartment 1802 55 Upper Ground SE1 9EY
15 Enterprise House 59-65 Upper Ground SE1 9PQ	Apartment 1801 55 Upper Ground SE1 9EY
Unit 204 Enterprise House SE1 9PG	Apartment 1803 55 Upper Ground SE1 9EY
Shop Enterprise House SE1 9PQ	Apartment 1805 55 Upper Ground SE1 9EY
Unit B2 Enterprise House SE1 9PQ	Apartment 1804 55 Upper Ground SE1 9EY
Unit B1 Enterprise House SE1 9PQ	Apartment 1907 55 Upper Ground SE1 9RB
Unit 6 Basement Enterprise House SE1 9PQ	Apartment 1906 55 Upper Ground SE1 9RB
5b Enterprise House 59-65 Upper Ground SE1 9PQ	Apartment 1908 55 Upper Ground SE1 9RB
9 Enterprise House 59-65 Upper Ground SE1 9PQ	Apartment 1910 55 Upper Ground SE1 9RB
Unit 203 Enterprise House SE1 9PG	Apartment 1909 55 Upper Ground SE1 9RB
Unit 10 Enterprise House SE1 9PQ	Apartment 1902 55 Upper Ground SE1 9RB
Flat 6 25 Broadwall SE1 9PS	Apartment 1901 55 Upper Ground SE1 9RB
Flat 5 25 Broadwall SE1 9PS	Apartment 1903 55 Upper Ground SE1 9RB
Flat 7 25 Broadwall SE1 9PS	Apartment 1905 55 Upper Ground SE1 9RB
Flat 9 25 Broadwall SE1 9PS	Apartment 1904 55 Upper Ground SE1 9RB
Flat 8 25 Broadwall SE1 9PS	Apartment 1607 55 Upper Ground SE1 9EY
Flat 1 25 Broadwall SE1 9PS	Apartment 1606 55 Upper Ground SE1 9EY
12-13 Milroy Walk London SE1 9LW	Apartment 1608 55 Upper Ground SE1 9EY
Flat 2 25 Broadwall SE1 9PS	Apartment 1610 55 Upper Ground SE1 9EY
Flat 4 25 Broadwall SE1 9PS	Apartment 1609 55 Upper Ground SE1 9EY
Flat 3 25 Broadwall SE1 9PS	Apartment 1602 55 Upper Ground SE1 9EY
Second Floor And Third Floor Flat 26 Blackfriars Road SE1 8NY	Apartment 1601 55 Upper Ground SE1 9EY
Flat 16 25 Broadwall SE1 9PS	Apartment 1603 55 Upper Ground SE1 9EY
Basement Ground Floor And First Floor 26 Blackfriars Road SE1 8NY	Apartment 1605 55 Upper Ground SE1 9EY
Fourth Floor Broadwall House SE1 9PL	Apartment 1604 55 Upper Ground SE1 9EY
First Floor Broadwall House SE1 9PL	Apartment 1707 55 Upper Ground SE1 9EY
Flat 11 25 Broadwall SE1 9PS	Apartment 1706 55 Upper Ground SE1 9EY
Flat 10 25 Broadwall SE1 9PS	Apartment 1708 55 Upper Ground SE1 9EY
Flat 12 25 Broadwall SE1 9PS	Apartment 1710 55 Upper Ground SE1 9EY
Flat 15 25 Broadwall SE1 9PS	Apartment 1709 55 Upper Ground SE1 9EY
Flat 14 25 Broadwall SE1 9PS	Apartment 1702 55 Upper Ground SE1 9EY
Flat 69 Rennie Court SE1 9NZ	Apartment 1701 55 Upper Ground SE1 9EY
Flat 22 Rennie Court SE1 9LP	Apartment 1703 55 Upper Ground SE1 9EY
Flat 21 Rennie Court SE1 9LP	Apartment 1705 55 Upper Ground SE1 9EY
Flat 23 Rennie Court SE1 9LP	Apartment 1704 55 Upper Ground SE1 9EY
Flat 25 Rennie Court SE1 9LP	Apartment 2403 55 Upper Ground SE1 9RB
Flat 24 Rennie Court SE1 9LP	Apartment 2402 55 Upper Ground SE1 9RB
Flat 18 Rennie Court SE1 9LP	Apartment 2404 55 Upper Ground SE1 9RB
Flat 16 Rennie Court SE1 9LP	Apartment 2406 55 Upper Ground SE1 9RB
Flat 19 Rennie Court SE1 9LP	Apartment 2405 55 Upper Ground SE1 9RB
Flat 20 Rennie Court SE1 9LP	Apartment 2304 55 Upper Ground SE1 9RB
Flat 2 Rennie Court SE1 9LP	Apartment 2303 55 Upper Ground SE1 9RB
Flat 31 Rennie Court SE1 9LP	Apartment 2305 55 Upper Ground SE1 9RB
Flat 30 Rennie Court SE1 9LP	Apartment 2401 55 Upper Ground SE1 9RB
Flat 32 Rennie Court SE1 9LP	Apartment 2306 55 Upper Ground SE1 9RB
Flat 34 Rennie Court SE1 9LP	Apartment 2601 55 Upper Ground SE1 9RB
Flat 33 Rennie Court SE1 9LP	Apartment 2506 55 Upper Ground SE1 9RB
Flat 27 Rennie Court SE1 9LP	Apartment 2602 55 Upper Ground SE1 9RB
Flat 26 Rennie Court SE1 9LP	Apartment 2604 55 Upper Ground SE1 9RB
Flat 28 Rennie Court SE1 9LP	Apartment 2603 55 Upper Ground SE1 9RB
Flat 3 Rennie Court SE1 9LP	Apartment 2502 55 Upper Ground SE1 9RB
Flat 29 Rennie Court SE1 9LP	Apartment 2501 55 Upper Ground SE1 9RB
15 Milroy Walk London SE1 9LW	Apartment 2503 55 Upper Ground SE1 9RB
10-11 Milroy Walk London SE1 9LW	Apartment 2505 55 Upper Ground SE1 9RB
2 Milroy Walk London SE1 9LW	Apartment 2504 55 Upper Ground SE1 9RB
6 Milroy Walk London SE1 9LW	Apartment 2101 55 Upper Ground SE1 9RB
3 Milroy Walk London SE1 9LW	Apartment 2006 55 Upper Ground SE1 9RB
Prince Albert 76 Colombo Street SE1 8DP	Apartment 2102 55 Upper Ground SE1 9RB
Rose And Crown 47 Colombo Street SE1 8DP	Apartment 2104 55 Upper Ground SE1 9RB
24 Blackfriars Road London SE1 8NY	Apartment 2103 55 Upper Ground SE1 9RB
22 Stamford Street London SE1 9LJ	Apartment 2002 55 Upper Ground SE1 9RB
45 Colombo Street London SE1 8EE	Apartment 2001 55 Upper Ground SE1 9RB
Flat 12 Rennie Court SE1 9LP	Apartment 2003 55 Upper Ground SE1 9RB
Flat 11 Rennie Court SE1 9LP	Apartment 2005 55 Upper Ground SE1 9RB
Flat 13 Rennie Court SE1 9LP	Apartment 2004 55 Upper Ground SE1 9RB
Flat 15 Rennie Court SE1 9LP	Apartment 2205 55 Upper Ground SE1 9RB
Flat 14 Rennie Court SE1 9LP	Apartment 2204 55 Upper Ground SE1 9RB
9 Milroy Walk London SE1 9LW	Apartment 2206 55 Upper Ground SE1 9RB
7 Milroy Walk London SE1 9LW	Apartment 2302 55 Upper Ground SE1 9RB

25 Stamford Street London SE1 9NT
Flat 10 Rennie Court SE1 9LP
Flat 1 Rennie Court SE1 9LP
Flat 59 Rennie Court SE1 9LP
Flat 58 Rennie Court SE1 9LP
Flat 6 Rennie Court SE1 9LP
Flat 8 Rennie Court SE1 9LP
Flat 7 Rennie Court SE1 9LP
Flat 54 Rennie Court SE1 9LP
Flat 53 Rennie Court SE1 9LP
Flat 55 Rennie Court SE1 9LP
Flat 57 Rennie Court SE1 9LP
Flat 56 Rennie Court SE1 9LP
Flat 65 Rennie Court SE1 9NZ
Flat 64 Rennie Court SE1 9NZ
Flat 66 Rennie Court SE1 9NZ
Flat 68 Rennie Court SE1 9NZ
Flat 67 Rennie Court SE1 9NZ
Flat 60 Rennie Court SE1 9NZ
Flat 9 Rennie Court SE1 9LP
Flat 61 Rennie Court SE1 9NZ
Flat 63 Rennie Court SE1 9NZ
Flat 62 Rennie Court SE1 9NZ
Flat 40 Rennie Court SE1 9LP
Flat 4 Rennie Court SE1 9LP
Flat 41 Rennie Court SE1 9LP
Flat 43 Rennie Court SE1 9LP
Flat 42 Rennie Court SE1 9LP
Flat 36 Rennie Court SE1 9LP
Flat 35 Rennie Court SE1 9LP
Flat 37 Rennie Court SE1 9LP
Flat 39 Rennie Court SE1 9LP
Flat 38 Rennie Court SE1 9LP
Flat 5 Rennie Court SE1 9LP
Flat 49 Rennie Court SE1 9LP
Flat 50 Rennie Court SE1 9LP
Flat 52 Rennie Court SE1 9LP
Flat 51 Rennie Court SE1 9LP
Flat 45 Rennie Court SE1 9LP
Flat 44 Rennie Court SE1 9LP
Flat 46 Rennie Court SE1 9LP
Flat 48 Rennie Court SE1 9LP
Flat 47 Rennie Court SE1 9LP
Apartment 1102 55 Upper Ground SE1 9EY
Apartment 1101 55 Upper Ground SE1 9EY
Apartment 1103 55 Upper Ground SE1 9EY
Apartment 1105 55 Upper Ground SE1 9EY
Apartment 1104 55 Upper Ground SE1 9EY
Annexe Part First Floor Friars Bridge Court SE1 8NZ
Managment Office Part Ground Floor Friars Bridge Court SE1 8NZ
20 Stamford Street London SE1 9LQ
9 Upper Ground London SE1 9LP
30 Stamford Street London SE1 9LQ
Apartment 1201 55 Upper Ground SE1 9EY
Apartment 1111 55 Upper Ground SE1 9EY
Apartment 1202 55 Upper Ground SE1 9EY
Apartment 1204 55 Upper Ground SE1 9EY
Apartment 1203 55 Upper Ground SE1 9EY
Apartment 1107 55 Upper Ground SE1 9EY
Apartment 1106 55 Upper Ground SE1 9EY
Apartment 1108 55 Upper Ground SE1 9EY
Apartment 1110 55 Upper Ground SE1 9EY
Apartment 1109 55 Upper Ground SE1 9EY
Second Floor And Third Floor 27 Broadwall SE1 9PL
Living Accommodation The Stamford Arms SE1 9LX
Unit 7 Enterprise House SE1 9PQ
Unit 1 04 A Enterprise House SE1 9PQ
Unit 8 Enterprise House SE1 9PQ
Living Accommodation 24 Blackfriars Road SE1 8NY

Apartment 2301 55 Upper Ground SE1 9RB
Apartment 2106 55 Upper Ground SE1 9RB
Apartment 2105 55 Upper Ground SE1 9RB
Apartment 2201 55 Upper Ground SE1 9RB
Apartment 2203 55 Upper Ground SE1 9RB
Apartment 2202 55 Upper Ground SE1 9RB
Flat 1 Block R Peabody Estate SE1 8DX
22 Broadwall London SE1 9QE
Flat 3 Block Q Peabody Estate SE1 8DX
Flat 8 Block R Peabody Estate SE1 8DY
Flat 3 Block R Peabody Estate SE1 8DY
Flat 14 Block R Peabody Estate SE1 8DY
Flat 12 Block R Peabody Estate SE1 8DY
Flat 7 Block O Peabody Estate SE1 8DT
Flat 6 Block O Peabody Estate SE1 8DT
Flat 3 Block N Peabody Estate SE1 8DS
Flat 9 Block N Peabody Estate SE1 8DS
11 Climsland House Duchy Street SE1 8AF
15 Climsland House Duchy Street SE1 8AF
Flat
Flat 7 Block M Peabody Estate SE1 8DR
Flat 3 Block K Peabody Estate SE1 8AS
Estate Office Block A Peabody Estate SE1 8AG
Flat 4 Block B Peabody Estate SE1 8AQ
Flat 2 Block B Peabody Estate SE1 8AQ
Flat 17 57 Stamford Street SE1 9DJ
Flat 14 57 Stamford Street SE1 9DJ
Flat 33 57 Stamford Street SE1 9DJ
Flat 57 57 Stamford Street SE1 9DJ
Flat 47 57 Stamford Street SE1 9DJ
Flat 51 57 Stamford Street SE1 9DJ
76 Roupell Street London SE1 8SS
Flat A 77 Foupell Street SE1 8SS
Flat 1 Block E Peabody Estate SE1 8AL
Flat 4 Block E Peabody Estate SE1 8AL
Flat 9 Block H Peabody Estate SE1 8AP
Flat 1 Block H Peabody Estate SE1 8AP
Flat 2 Block F Peabody Estate SE1 8AN
Flat 7 Block G Peabody Estate SE1 8AW
Flat 12 Block Q Peabody Estate SE1 8DX
Flat 8 Block Q Peabody Estate SE1 8DX
Flat 6 Block R Peabody Estate SE1 8DY
Flat 10 Block R Peabody Estate SE1 8DY
Flat 3 26 Broadwall SE1 9QE
Flat 4 26 Broadwall SE1 9QE
Flat 3 Block O Peabody Estate SE1 8DT
Flat 2 Block O Peabody Estate SE1 8DT
Flat 8 Block O Peabody Estate SE1 8DT
Flat 10 Block N Peabody Estate SE1 8DS
Flat 8 Block N Peabody Estate SE1 8DS
Flat 1 Block N Peabody Estate SE1 8DS
Flat 5 Block N Peabody Estate SE1 8DS
6 Climsland House Duchy Street SE1 8AF
Flat 8 Block M Peabody Estate SE1 8DR
Flat 3 Block M Peabody Estate SE1 8DR
Flat 6 Block M Peabody Estate SE1 8DR
Flat 7 Block K Peabody Estate SE1 8AS
Flat 10 Block K Peabody Estate SE1 8AS
Flat 12 Block A Peabody Estate SE1 8AG
Flat 7 Block A Peabody Estate SE1 8AG
Flat 16 57 Stamford Street SE1 9DJ
Flat 24 57 Stamford Street SE1 9DJ
Flat 5 57 Stamford Street SE1 9DJ
Flat 10 57 Stamford Street SE1 9DJ
2 Climsland House Duchy Street SE1 8AF
Flat 8, Block E Peabody Estate, Duchy Street SE1 8AL
8 Aquinas Street London SE1 8AE
81 Roupell Street SE1 b8SU
25 Cornwall Road London SE1 8TW

Ground Floor 56 Stamford Street SE1 9LX
Mad Hatter Hotel 3-7 Stamford Street SE1 9NY
Living Accommodation 76 Colombo Street SE1 8DP
Living Accommodation 47 Colombo Street SE1 8DP
Fourth Floor Dorset House SE1 9NT
Fifth Floor To Eighth Floor Dorset House SE1 9NT
Unit B03 Enterprise House SE1 9PG
Part First Floor East Friars Bridge Court SE1 8NZ
Units G06 07 08 Enterprise House SE1 9PG
Unit 1 04 C Enterprise House SE1 9PQ
Unit 1 04 B Enterprise House SE1 9PQ

25 Cornwall Road London SE1 8TW
30 Styles House Hatfields SE18DF
4 Climsland House Duchy Street SE1 8AF
Flat 4 Block O Peabody Estate Duchy Street SE1 8DT
Flat 41 Styles House SE1 8DF
Flat 19, Benson House Hatfields SE1 8DQ

On Behalf Of A Resident At Southwark Bank Tower
58/60 Stamford Street London SE1 9LX
Flat 6 Block M Peabody Estate Duchy Street SE1 8DR
14 Climsland House Duchy Street SE1 8AF
76 Hatfield House

Re-consultation: 15/08/2018

Consultation responses received

Internal services

Design and Conservation Team (including Archaeology)
Ecology
Economic Development Team
Environmental Protection Team
Flood Risk and Drainage Team
Highways Development Management
Transport Planning
Urban Forester

Statutory and non-statutory organisations

Arqiva - digital communications
City Of London
Environment Agency
Greater London Authority
Historic England
London Borough of Lambeth
Metropolitan Police Service (Designing out Crime)
Thames Water - Development Planning
Transport for London

Neighbours and local groups

On Behalf Of A Resident At Southwark Bank Tower
Email representation
Email representation
Flat 19,Benson House Hatfields SE1 8DQ
Flat 19,Benson House Hatfields SE1 8DQ
Flat 4 Block O Peabody Estate Duchy Street SE1 8DT
Flat 41 Styles House SE1 8DF
Flat 6 Block M Peabody Estate Duchy Street SE1 8DR
Flat 8, Block E Peabody Estate, Duchy Street SE1 8AL
14 Climsland House Duchy Street SE1 8AF
2 Climsland House Duchy Street SE1 8AF
25 Cornwall Road London SE1 8TW
30 Styles House Hatfields SE18DF
4 Climsland House Duchy Street SE1 8AF
58/60 Stamford Street London SE1 9LX
81 Roupell Street SE1 b8SU

APPENDIX 3

Consultation undertaken on listed building consent application 17/AP/4231

Site notice date: 26/01/2018

Press notice date: 07/12/2017

Case officer site visit date: n/a

Neighbour consultation letters sent: n/a

Internal services consulted:

n/a

Statutory and non-statutory organisations consulted:

Ancient Monuments Society
Council for British Archaeology
English Heritage Ancient Scheduled Monuments
Historic England
Metropolitan Police Service (Designing out Crime)
The Society for the Protection of Ancient Buildings
The Victorian Society

Neighbour and local groups consulted:

49 Colombo St London SE1 8DP

Re-consultation: 20/08/2018

Consultation responses received on application 17/AP/4231

Internal services

Design and Conservation

Statutory and non-statutory organisations

Historic England

Metropolitan Police Service (Designing out Crime)

Neighbours and local groups

49 Colombo St London SE1 8DP
Save Britain's Heritage