

## Planning Committee

Monday 24 February 2020

6.30 pm

Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

### Membership

Councillor Martin Seaton (Chair)  
Councillor Kath Whittam (Vice-Chair)  
Councillor Barrie Hargrove  
Councillor Adele Morris  
Councillor Margy Newens  
Councillor Damian O'Brien  
Councillor Catherine Rose  
Councillor Cleo Soanes

### Reserves

Councillor Eleanor Kerslake  
Councillor Sarah King  
Councillor Richard Livingstone  
Councillor Darren Merrill  
Councillor Jane Salmon

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## INFORMATION FOR MEMBERS OF THE PUBLIC

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### Access to information

You have the right to request to inspect copies of minutes and reports on this agenda as well as the background documents used in the preparation of these reports.

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**Contact:** Gerald Gohler on 020 7525 7420 or email: [gerald.gohler@southwark.gov.uk](mailto:gerald.gohler@southwark.gov.uk)

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Members of the committee are summoned to attend this meeting

**Eleanor Kelly**

Chief Executive

Date: 14 February 2020



# Planning Committee

Monday 24 February 2020

6.30 pm

Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

## Order of Business

Item No.	Title	Page No.
	<b>PROCEDURE NOTE</b>	
1.	<b>APOLOGIES</b>	
	To receive any apologies for absence.	
2.	<b>CONFIRMATION OF VOTING MEMBERS</b>	
	A representative of each political group will confirm the voting members of the committee.	
3.	<b>NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT</b>	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	<b>DISCLOSURE OF INTERESTS AND DISPENSATIONS</b>	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	<b>MINUTES</b>	1 - 3
	To approve as a correct record the minutes of the open section of the meeting held on 14 January 2020.	
6.	<b>DEVELOPMENT MANAGEMENT</b>	4 - 7
	<b>6.1. SAMPSON HOUSE, 64 HOPTON STREET, LONDON SE1 9JH</b>	8 - 146

<b>Item No.</b>	<b>Title</b>	<b>Page No.</b>
	<b>6.2. PLOT H7 HEYGATE STREET WITHIN LAND BOUNDED BY ELEPHANT PARK TO THE NORTH, PLOT H2 TO THE WEST, HEYGATE STREET TO THE SOUTH AND H11B TO THE EAST, LONDON SE17</b>	147 - 241

**ANY OTHER OPEN BUSINESS AS NOTIFIED AT THE START OF THE MEETING AND ACCEPTED BY THE CHAIR AS URGENT.**

**EXCLUSION OF PRESS AND PUBLIC**

The following motion should be moved, seconded and approved if the committee wishes to exclude the press and public to deal with reports revealing exempt information:

“That the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 1-7, Access to Information Procedure rules of the Constitution.”

**DISTRIBUTION OPEN 2019\_20**

Date: 14 February 2020

## Planning Committee

### Guidance on conduct of business for planning applications, enforcement cases and other planning proposals

1. The reports are taken in the order of business on the agenda.
2. The officers present the report and recommendations and answer points raised by members of the committee.
3. The role of members of the planning committee is to make planning decisions openly, impartially, with sound judgement and for justifiable reasons in accordance with the statutory planning framework.
4. The following may address the committee (if they are present and wish to speak) for **not more than 3 minutes each**.

- (a) One representative (spokesperson) for any objectors. If there is more than one objector wishing to speak, the time is then divided within the 3-minute time slot.
- (b) The applicant or applicant's agent.
- (c) One representative for any supporters (who live within 100 metres of the development site).
- (d) Ward councillor (spokesperson) from where the proposal is located.
- (e) The members of the committee will then debate the application and consider the recommendation.

**Note:** Members of the committee may question those who speak only on matters relevant to the roles and functions of the planning committee that are outlined in the constitution and in accordance with the statutory planning framework.

5. If there are a number of people who are objecting to, or are in support of, an application or an enforcement of action, you are requested to identify a representative to address the committee. If more than one person wishes to speak, the 3-minute time allowance must be divided amongst those who wish to speak. Where you are unable to decide who is to speak in advance of the meeting, you are advised to meet with other objectors in the foyer of the council offices prior to the start of the meeting to identify a representative. If this is not possible, the chair will ask which objector(s) would like to speak at the point the actual item is being considered.
6. Speakers should lead the committee to subjects on which they would welcome further questioning.
7. Those people nominated to speak on behalf of objectors, supporters or applicants, as well as ward members, should sit on the front row of the public seating area. This is for ease of communication between the committee and the speaker, in case any issues need to be clarified later in the proceedings; it is **not** an opportunity to take part in the debate of the committee.

8. Each speaker should restrict their comments to the planning aspects of the proposal and should avoid repeating what is already in the report. The meeting is not a hearing where all participants present evidence to be examined by other participants.
9. This is a council committee meeting which is open to the public and there should be no interruptions from the audience.
10. No smoking is allowed at committee.
11. Members of the public are welcome to film, audio record, photograph, or tweet the public proceedings of the meeting; please be considerate towards other people in the room and take care not to disturb the proceedings.

**The arrangements at the meeting may be varied at the discretion of the chair.**

**Contacts:** General Enquiries  
Planning Section, Chief Executive's Department  
Tel: 020 7525 5403

Planning Committee Clerk, Constitutional Team  
Finance and Governance  
Tel: 020 7525 5485



## Planning Committee

MINUTES of the OPEN section of the Planning Committee held on Tuesday 14 January 2020 at 6.30 pm at Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

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**PRESENT:** Councillor Martin Seaton (Chair)  
 Councillor Kath Whittam (Vice-Chair)  
 Councillor Barrie Hargrove  
 Councillor Margy Newens  
 Councillor Damian O'Brien  
 Councillor Catherine Rose  
 Councillor Jane Salmon (Reserve)  
 Councillor Cleo Soanes

**OFFICER SUPPORT:** Simon Bevan, Director of Planning  
 Patrick Cronin, Development Management  
 Jon Gorst, Legal Services  
 Yvonne Lewis, Strategic Applications Team  
 Alex Oyebade, Transport Policy  
 Michael Tsoukaris, Design & Conservation Team  
 Everton Roberts, Constitutional Team

### 1. APOLOGIES

Apologies for absence were received from Councillor Adele Morris.

### 2. CONFIRMATION OF VOTING MEMBERS

Those Members listed as present were confirmed as the voting members for the meeting.

### 3. NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT

The chair gave notice of the following additional papers which were circulated at the meeting.

- Addendum report relating to item 5.1
- Members' pack relating to item 5.1

#### 4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

There were no disclosures of interests or dispensations.

#### 5. DEVELOPMENT MANAGEMENT

##### RESOLVED:

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the agenda be considered.
2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the reports unless otherwise stated.
3. That where reasons for decisions or conditions are not included or not as included in the reports relating to an individual item, they be clearly specified.

#### 5.1 135 PARK STREET, LONDON SE1 9EA AND 4-8 EMERSON STREET, LONDON SE1

##### Proposal:

*Redevelopment of the site including the demolition of the existing buildings and construction of a 12 storey building (plus basement and roof top plant enclosure) with a maximum height of 50.707m AOD, comprising office (Class B1) floorspace on all floors with a flexible retail/café (Class A1/A3) unit at ground floor level. The development will include cycle parking, servicing, refuse and plant areas, hard and soft landscaped public realm improvements and other associated works.*

The committee heard the officer's introduction to the report. Members of the committee asked questions of the officers.

There were no objectors present.

The applicant's agent addressed the committee, and answered questions from the committee.

There were no supporters who lived within 100 metres of the development site present at the meeting that wished to speak.

There were no ward councillors present, however a letter submitted by Councillor David Noakes, local ward councillor raising some concerns with the application was referred to in the officer's introduction.

The committee put further questions to the officers and discussed the application.

A motion to grant the application was moved, seconded, put to the vote and declared

carried.

**RESOLVED:**

1. That full planning permission be granted for 19/AP/0240, subject to referral to the Mayor for London, and to conditions in the report and addendum report and the applicant entering into a satisfactory legal agreement.
2. That in the event of a legal agreement not having been entered into by 14 May 2020, the director of planning be authorised to refuse planning permission for 19/AP/0240, if appropriate, for the reasons set out in paragraph 231 of the report.

The meeting ended at 7.46pm

**CHAIR:**

**DATED:**



<b>Item No.</b> 6.	<b>Classification:</b> Open	<b>Date:</b> 24 February 2020	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>		Development Management	
<b>Ward(s) or groups affected:</b>		All	
<b>From:</b>		Proper Constitutional Officer	

## RECOMMENDATIONS

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the attached items be considered.
2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the attached reports unless otherwise stated.
3. That where reasons for decisions or conditions are not included or not as included in the reports relating to an individual item, they be clearly specified.

## BACKGROUND INFORMATION

4. The council's powers to consider planning business are detailed in Part 3F which describes the role and functions of the planning committee and planning sub-committees. These were agreed by the annual meeting of the council on 23 May 2012. The matters reserved to the planning committee and planning sub-committees exercising planning functions are described in part 3F of the Southwark Council constitution.

## KEY ISSUES FOR CONSIDERATION

5. In respect of the attached planning committee items members are asked, where appropriate:
  - a. To determine those applications in respect of site(s) within the borough, subject where applicable, to the consent of the Secretary of State for Housing, Communities and Local Government and any directions made by the Mayor of London.
  - b. To give observations on applications in respect of which the council is not the planning authority in planning matters but which relate to site(s) within the borough, or where the site(s) is outside the borough but may affect the amenity of residents within the borough.
  - c. To receive for information any reports on the previous determination of applications, current activities on site, or other information relating to specific planning applications requested by members.

6. Each of the following items are preceded by a map showing the location of the land/property to which the report relates. Following the report, there is a draft decision notice detailing the officer's recommendation indicating approval or refusal. Where a refusal is recommended the draft decision notice will detail the reasons for such refusal.
7. Applicants have the right to appeal to Planning Inspector against a refusal of planning permission and against any condition imposed as part of permission. Costs are incurred in presenting the council's case at appeal which maybe substantial if the matter is dealt with at a public inquiry.
8. The sanctioning of enforcement action can also involve costs such as process serving, court costs and of legal representation.
9. Where either party is felt to have acted unreasonably in an appeal the inspector can make an award of costs against the offending party.
10. All legal/counsel fees and costs as well as awards of costs against the council are borne by the budget of the relevant department.

#### **Community impact statement**

11. Community impact considerations are contained within each item.

#### **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

##### **Director of Law and Democracy**

12. A resolution to grant planning permission shall mean that the director of planning is authorised to grant planning permission. The resolution does not itself constitute the permission and only the formal document authorised by the committee and issued under the signature of the director of planning shall constitute a planning permission. Any additional conditions required by the committee will be recorded in the minutes and the final planning permission issued will reflect the requirements of the planning committee.
13. A resolution to grant planning permission subject to legal agreement shall mean that the director of planning is authorised to issue a planning permission subject to the applicant and any other necessary party entering into a written agreement in a form of words prepared by the director of law and democracy, and which is satisfactory to the director of planning. Developers meet the council's legal costs of such agreements. Such an agreement shall be entered into under section 106 of the Town and Country Planning Act 1990 or under another appropriate enactment as shall be determined by the director of law and democracy. The planning permission will not be issued unless such an agreement is completed.
14. Section 70 of the Town and Country Planning Act 1990 as amended requires the council to have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations when dealing with applications for planning permission. Where there is any conflict with any policy contained in the

development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published, as the case may be (s38(5) Planning and Compulsory Purchase Act 2004).

15. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The development plan is currently Southwark's Core Strategy adopted by the council in April 2011, saved policies contained in the Southwark Plan 2007, the where there is any conflict with any policy contained in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published, as the case may be (s38(5) Planning and Compulsory Purchase Act 2004).
16. On 15 January 2012 section 143 of the Localism Act 2011 came into force which provides that local finance considerations (such as government grants and other financial assistance such as New Homes Bonus) and monies received through CIL (including the Mayoral CIL) are a material consideration to be taken into account in the determination of planning applications in England. However, the weight to be attached to such matters remains a matter for the decision-maker.
17. "Regulation 122 of the Community Infrastructure Levy regulations (CIL) 2010, provides that "a planning obligation may only constitute a reason for granting planning permission if the obligation is:
  - a. necessary to make the development acceptable in planning terms;
  - b. directly related to the development; and
  - c. fairly and reasonably related to the scale and kind to the development.

A planning obligation may only constitute a reason for granting planning permission if it complies with the above statutory tests."

18. The obligation must also be such as a reasonable planning authority, duly appreciating its statutory duties can properly impose i.e. it must not be so unreasonable that no reasonable authority could have imposed it. Before resolving to grant planning permission subject to a legal agreement members should therefore satisfy themselves that the subject matter of the proposed agreement will meet these tests.
19. The National Planning Policy Framework (NPPF) came into force on 27 March 2012. The NPPF replaces previous government guidance including all planning practice guidance (PPGs) and planning policy statements (PPSs). For the purpose of decision-taking policies in the Core Strategy (and the London Plan) should not be considered out of date simply because they were adopted prior to publication of the NPPF. For 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted in accordance with the Planning and Compulsory Purchase Act (PCPA) 2004 even if there is a limited degree of conflict with the NPPF.
20. In other cases and following and following the 12 month period, due weight should be given to relevant policies in existing plans according to their degree of consistency with the NPPF. This is the approach to be taken when considering saved plan policies under the Southwark Plan 2007. The approach to be taken is that the closer the

policies in the Southwark Plan to the policies in the NPPF, the greater the weight that may be given.

## BACKGROUND DOCUMENTS

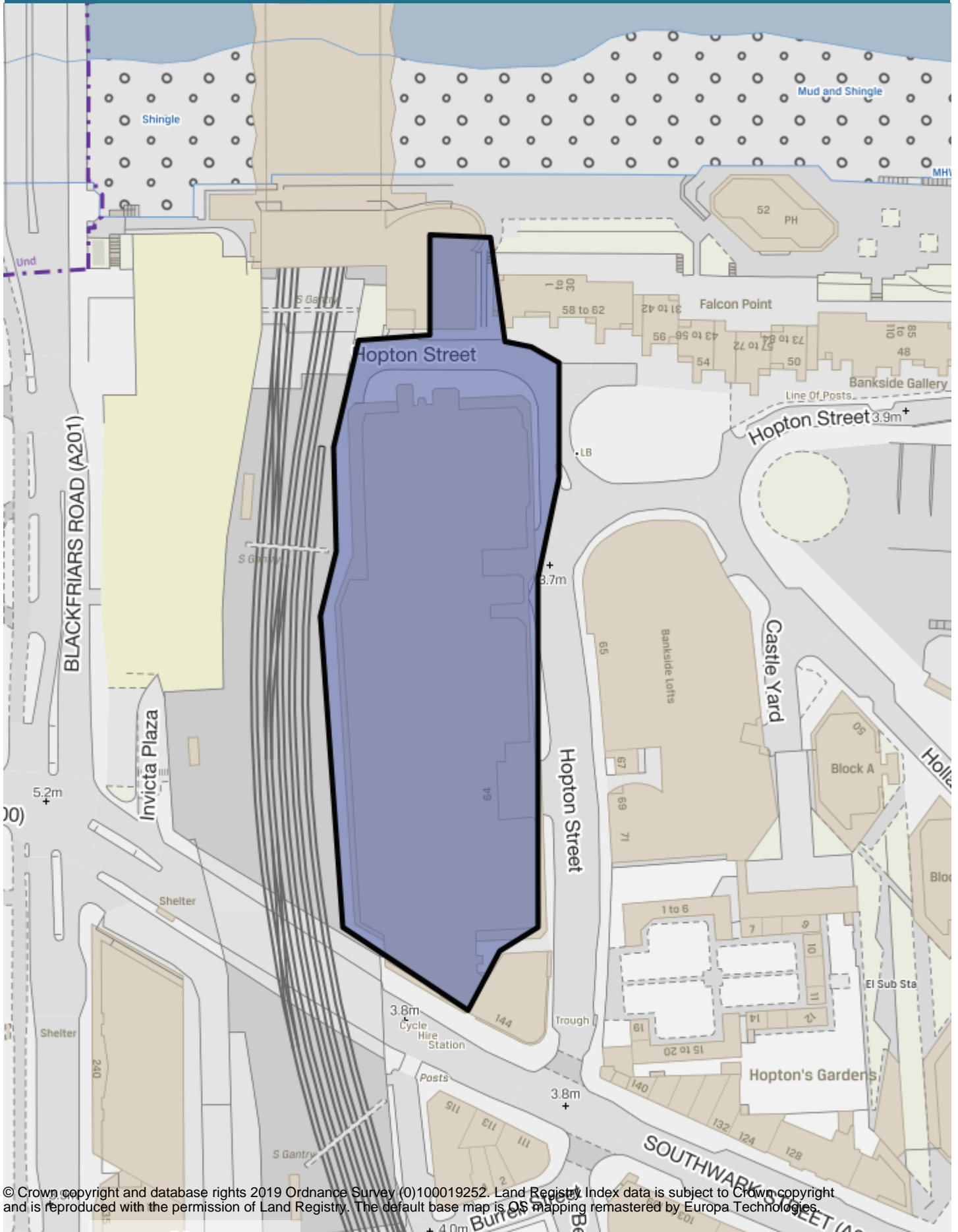
Background Papers	Held At	Contact
Council assembly agenda 23 May 2012	Constitutional Team 160 Tooley Street London SE1 2QH	Virginia Wynn-Jones 020 7525 7055
Each planning committee item has a separate planning case file	Development Management 160 Tooley Street London SE1 2QH	Planning Department 020 7525 5403

## APPENDICES

No.	Title
None	

## AUDIT TRAIL

<b>Lead Officer</b>	Chidilim Agada, Head of Constitutional Services	
<b>Report Author</b>	Everton Roberts, Principal Constitutional Officer Jonathan Gorst, Head of Regeneration and Development	
<b>Version</b>	Final	
<b>Dated</b>	12 February 2020	
<b>Key Decision?</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments sought</b>	<b>Comments included</b>
Director of Law and Democracy	Yes	Yes
Director of Planning	No	No
<b>Cabinet Member</b>	No	No
<b>Date final report sent to Constitutional Team</b>		12 February 2020



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<b>Item No.</b> 6.1	<b>Classification:</b> Open	<b>Date:</b> 24 February 2020	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b>  Application 18/AP/1603 for: Full Planning Application <b>Address:</b> SAMPSON HOUSE, 64 HOPTON STREET, LONDON, SE1 9JH  <b>Proposal:</b> Redevelopment to create two levels of basement and the erection of five buildings ranging from seven to 34 storeys plus plant (heights ranging from 28.9m AOD – 123.9m AOD) to provide: 341 dwellings (Class C3); 8,054sqm (GIA) of office space (Class B1); 1,436sqm (GIA) of retail floorspace (Class A1-A4); 904sqm (GIA) of cultural floorspace (Class D1/D2); 16,254sqm (GIA) hotel with up to 126 rooms (Class C1); new open space; reconfigured vehicular and pedestrian access; highway works; landscaping; basement car park for 107 cars (including 29 disabled car parking spaces), plus servicing and plant areas; and works associated and ancillary to the proposed development.		
<b>Ward(s) or groups affected:</b>	Cathedrals		
<b>From:</b>	Director of Planning		
<b>Application Start Date:</b> 08/06/2018		<b>Application Expiry Date:</b> 28/09/2018	
<b>Earliest Decision Date:</b> 24/09/2018			

### RECOMMENDATION

1. That the planning committee grant planning permission subject to conditions, the applicant entering into an appropriate legal agreement and referral to the Mayor of London.
2. That, should planning permission be granted, it be confirmed that the environmental information has been taken into account as required by Regulation 3 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017.
3. That following issue of the decision it be confirmed that the director of planning shall place a statement on the Statutory Register pursuant to Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations and for the purposes of Regulation 30(1) (d) the main reasons and considerations on which the Local Planning Authority's decision is based shall be set out as in this report.
4. In the event that the requirements of paragraph 1 above are not met by 30 November 2020, the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 303.

### EXECUTIVE SUMMARY

5. Planning permission was granted in 2014 for the redevelopment of the site known as



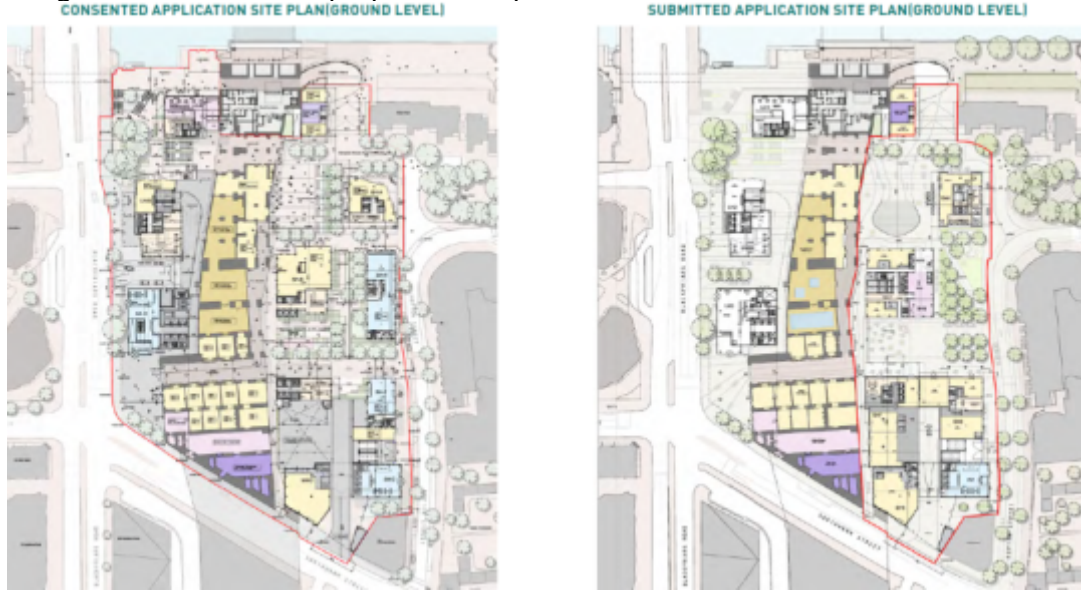
Sampson House and Ludgate House which is located at the northern end of Blackfriars Road and is further bound by Southwark Street, Hopton Street and the River Thames. The site spans the Blackfriars Thameslink railway viaduct which essentially divides the site into two sections, Sampson House to the east and Ludgate House to the west.

6. The original planning permission was granted with a legal agreement on 28 March 2014 and was valid for three years (planning application reference. 12/AP/3940). The planning permission includes the demolition of the existing Sampson House and Ludgate House buildings and redevelopment of the entire site to provide 489 flats as well as offices, retail (Classes A1-A5), community uses (Class D1) and a gym (Class D2). The approved development includes nine new buildings ranging in height from 5 to 49 storeys. The consent was implemented in 2016 and this was confirmed by way of a Certificate of Lawfulness on 29 March 2017.
7. Subsequent to the original permission a non-material amendment was agreed under application reference 16/AP/2806 which relocated 29 residential units from the Sampson House site to the Ludgate House site. Following this, application 17/AP/2286 approved minor material amendments involving the creation of an additional three floors of office space on the approved building known as Ludgate C whilst reducing office floorspace within the Sampson D building by seven storeys. This application was approved with a Deed of Variation to the original legal agreement in November 2017. These consents were neutral in terms of their overall impact on the number of units and quantum of office space.
8. A further application seeking minor material amendments was approved in March 2019 under reference 18/AP/1702. This application sought to regularise the condition numbers coming from the previous minor material amendment application and did not proposed any physical scheme amendments.
9. In 2015 the site was purchased by Native Land (the current applicant) who sought agreement for the development to be treated as two separate phases, each capable of delivery independently. To this end, an application to vary the legal agreement was approved in March 2019 under reference 18/AP/1316. The amendments to the legal agreement essentially separated the Ludgate House and Sampson House obligations. Sampson House has now been demolished whilst the construction on the Ludgate site is well under way with the core of building BY3 currently at 19th floor level.
10. With the ability to now deliver the sites independently of one another, the applicant has chosen to make a new application for planning permission on the Sampson House site. The proposed development is similar to the approved development in many respects including the broad location and positioning of buildings and access/egress. The main differences between the proposed scheme and the extant scheme include the reduction in the number of buildings from six to five by the omission of building SH-E; increasing the height of three of the buildings compared to the approved scheme and decreasing the height of one other; an increased number of homes; the creation of a large cultural venue; and the provision of a large hotel. The relative heights of the approved buildings is set out in the table below:

Table 1. – Consented and proposed building heights

Approved Building	Height	Proposed Building	Height
SH-A	62.85m AOD	SH-4	79.45m AOD
SH-B	112.10m AOD	SH-5	123.9m AOD
SH-C	98.3m AOD	SH-7	107.9m AOD
SH-D	60.8m AOD	SH-9	42.2m AOD
SH-E	24.6m AOD	Omitted	-
SH-F	28.9m AOD	SH-8	28.9m AOD

Image – Consented and proposed site plans



11. The implemented consent is a material consideration in the determination of the current application. That permission established the principle of the acceptability of a high density development; creation of new homes, retail, office and cultural space; the reduction in the overall quantum of office floorspace; and the provision of tall buildings. The development also essentially established a threshold for the consideration of environmental and amenity impacts. That is not to say that these issues would not be assessed under the current application but where policies or other circumstances relating to these matters have not significantly changed in the intervening period, the council would need to give due consideration as to whether reaching a different decision on the issue would be reasonable.
12. The consented scheme did not include on-site affordable housing and instead provided a payment in lieu for the delivery of affordable housing under the councils Direct Delivery scheme (or other related successor programmes). A staged payment has been received in relation to the Ludgate House development but the current stage of development has not yet triggered a requirement for a payment on Sampson House.
13. A total of 79 objections have been received. The main points of the objections are set out below along with the number of times they have been raised. A detailed breakdown of the objections along with a detailed officer response is set out in paragraphs 331-400.

Main point of objection	Number of times raised.
Daylight and sunlight	51
Traffic and access issues	50
Amenity Impacts including loss of privacy	44
Noise and disturbance	42
Excessive height, scale and massing	26
Impacts from the cultural use	20
Overdevelopment	18
Impacts from the hotel	15
Environmental impacts including dust, air quality and contamination	14
Impacts from bars and restaurants	14
Car parking	10
Health impacts	10
Insufficient open space	8
Wind impacts	8
Consultation issues	5
Loss of Sampson House	4
Affordable housing	3
Sustainability	2

14. The proposal would secure additional benefits to the consented scheme, the most significant being the provision of on-site affordable housing and an enhanced in lieu payment as well as the benefits to Hopton Street arising from the omission of approved building SH-E; an increase in public open space; and the various public realm enhancements surrounding the cultural square.

## **BACKGROUND INFORMATION**

### **Site location and description**

15. The application site measures 1.01 hectares and comprises the building and plot formerly occupied by an eight storey office building known as Sampson House and part of the railway arches that form the Blackfriars Thameslink railway viaduct. The site is bounded by the Thames Path and Blackfriars Station to the north, Hopton Street to the east, Southwark Street to the south and the Blackfriars railway viaduct to the west.
16. Sampson House was built in 1979 as a cheque clearing centre for Lloyds Bank and was formerly used as a data centre and disaster recovery centre/facility by IBM with a low number of people employed at the site. The building has been vacant for several months and is now in the advanced stages of demolition which is being carried out under the existing consent (Ref: 12/AP/3940).
17. The adjacent viaduct arches comprise 14 individual arches. Arches 1-5 were previously occupied by the Pulse Nightclub and Arches 12-14 provided access from Hopton Street to the neighbouring office building known as Ludgate House. The remaining arches provided car parking for Ludgate House and all are now vacant. Ludgate House has been demolished as part of the forthcoming redevelopment of that site which is now under construction.
18. The site is not within a conservation area and the existing buildings on the site are not listed. An application was previously made by a third party to English Heritage to

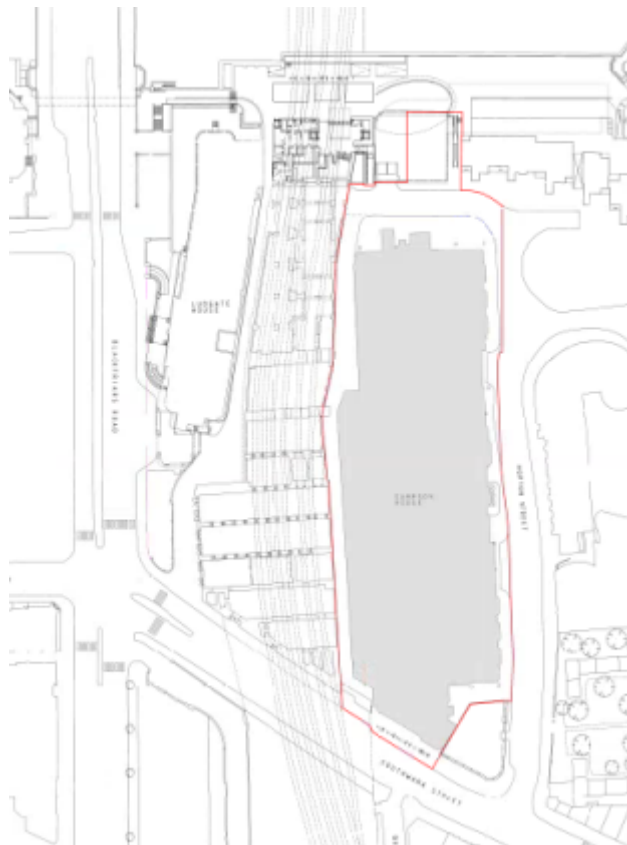
designate Sampson House as a listed building but the application was unsuccessful.

19. The site has a Public Transport Accessibility Level (PTAL) of 6b (indicating an excellent level of transport accessibility) and is located within Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding. It is, however, protected by the Thames flood defences.

### **The surrounding area**

20. The site is bound to the north by the Thames Path which provides pedestrian links to numerous cultural attractions on the South Bank. To the east of the site lies Hopton Street, which is both residential and commercial in character and includes flatted developments such as Falcon Point (including Falcon Point piazza) and Bankside Lofts. The site is within the setting of several listed structures including the Hopton Street Almshouses which are Grade II\* listed; 61 Hopton Street which is Grade II listed; and the Blackfriars and St Paul's railway bridge which is also Grade II listed.
21. To the south along Blackfriars Road is the office development known as 240 Blackfriars which rises to 20 storeys. Adjoining Sampson House to its south at 144 Southwark Street is an office building known as Titan House.

Image – Site plan



22. To the west lies the development site known as Ludgate House which is also owned by Native Land and which will continue to link with the application site under a comprehensive masterplan approach. Further to the west lies River Court, a residential housing block fronting the river and also the site of 1 Blackfriars, a mixed use commercial, residential and hotel development with the tallest building rising to 50 storeys.
23. The nearest conservation area is the Old Barge House Alley Conservation Area, which is

to the west of the site, split between the boroughs of Southwark and Lambeth and contains the unlisted Oxo Tower building. Other nearby conservation areas are Bear Gardens to the east of the site (east of the Globe Theatre) and Kings Bench to the south east of the site (south of Union Street). The Whitefriars Conservation Area is located across the river, within City of London.

### Details of proposal

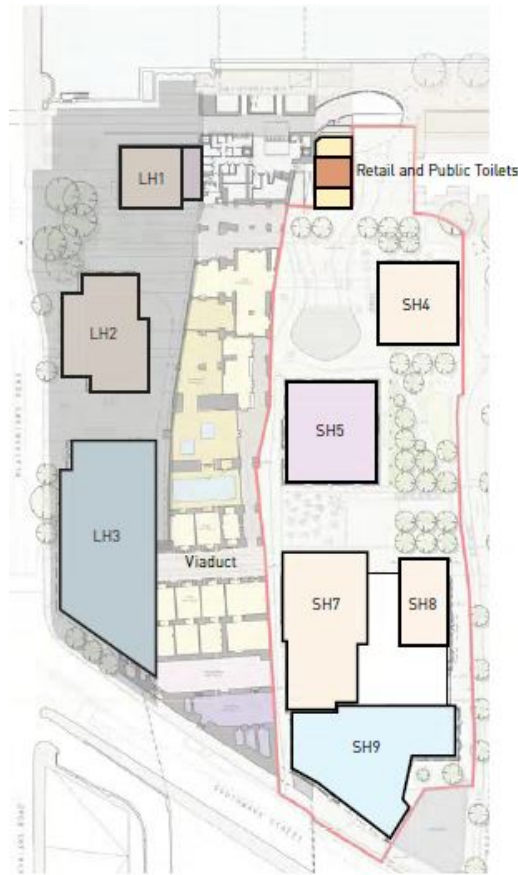
24. Planning consent is sought for the redevelopment of the site to provide 341 new homes alongside 8,453sqm of Class B1 office space; 1527sqm of retail space (Classes A1/A2/A3/A4); 935sqm of Class D1/D2 cultural space and a 126 bedroom hotel with associated facilities. The redevelopment would also provide for new public realm and landscaped areas. Parking for 70 residential vehicles would be provided in a large basement which extends to two levels and spans the application site with linkages to the neighbouring development site known as Ludgate House.

#### Schedule of accommodation

Schedule of accommodation				
	Market Housing	Intermediate	Social Rented	Total
Studio	17	-	-	17
1 Bed	90	4	10	104
2 Bed	162	11	10	183
3 Bed	33	-	2	35
4 Bed	2	-	-	2
<b>Total</b>	<b>304</b>	<b>15</b>	<b>22</b>	<b>341</b>

25. The development would be delivered across five buildings (SH-4, SH-5, SH-7, SH-8 and SH-9) which would all be linked at basement level.

Image - Layout

***Building SH-4***

26. Building SH-4 is located at the northern end of the site adjacent to the flatted block known as Falcon Point and the River Thames/Thames Path. SH-4 would rise to 20 storeys in height (79.45m AOD) and would accommodate 74 market homes with retail space at ground floor. Building SH-4 would be clad in two contrasting metals. The outer face of the building would comprise stainless steel which is robust and would remain consistent in appearance over time. On the inner surface, the proposed recessed metal panel would be a warm contrasting metal which has the ability to change over time, dulling where it is exposed and becoming polished where frequently touched. Building SH-4 would provide the following accommodation:

Sampson House 4 (SH-4)				
	No. of units	SPD Min Size	Proposed Min Size	Proposed Max Size
1 Bed	25	50	58	66
2 Bed	36	61	87	123
3 Bed	11	74	133	186
4 Bed	2	90	255	279
Total	74	-	-	-

***Building SH-5***

27. Building SH-5 is located to the south of SH-4 and would sit immediately adjacent to the railway viaduct. At 34 storeys in height (123.9m AOD) SH-5 would be the tallest building on the site and would provide a mix of uses including retail, hotel and new homes. The proposed 5\* hotel will occupy levels 1 to 16 and will provide the following:

- Associated ancillary facilities from levels 1 to 3 (including mezzanine) which includes function spaces, bar/dining areas, meeting room, fitness and spa treatment rooms;
- 126 hotel rooms and suites at levels 4 to 14; and
- Bar/dining space at levels 15 and 16 which is available to both hotel guests and members of the public.
- A cultural space for Class D1/D2 use would be provided at ground, basement and basement mezzanine level. Access would be achieved at ground floor level and basement level from the cultural square via the hard landscaping feature that the internal space opens out onto.

28. From levels 17 to 30, building SH-5 would provide 61 new homes in the configuration set out in the table below.

Sampson House 5 (SH-5)				
	No. of units	SPD Min Size	Proposed Min Size	Proposed Max Size
1 Bed	13	50	56	67
2 Bed	34	61	80	129
3 Bed	14	74	133	228
Total	61	-	-	-

29. The proposed materials, which would comprise a bronze copper textured material, plus metallic minerals on the façade, will form a patina layer and create the appearance of gradual fading over time.

*Building SH-7*

30. Comprising a 30 storey (107.9m AOD) building, SH-7 sits within the southern part of the Sampson House site, adjacent to the railway viaduct the west and SH-5 to the north. Retail floorspace would be provided at ground floor and the remainder of the building would provide both market and intermediate homes in a mix as set out below.

Sampson House 7 (SH-7)				
	No. of units	SPD Min Size	Proposed Min Size	Proposed Max Size
Studio	17	37	40	40
1 Bed	56	50	51	64
2 Bed	103	61	73	104
3 Bed	8	74	132	135
Total	184	-	-	-

31. SH-7 would be the second tallest building on the site and has been designed to continue the transition from SH-5 to the lower context buildings to the south and east. In terms of materiality, SH-7 would be clad in a cast stone masonry façade, which would be granular in texture.

*Building SH-8*

32. Building SH-8 would be located on Hopton Street to the west of building SH-7. This building would be seven storeys in height (28.9m AOD) and would provide 22 new homes on social rented terms. Retail floorspace would be provided at ground floor level and a communal terrace for residents will be provided on the rooftop.

Sampson House 8 (SH-8)				
	No. of units	SPD Min Size	Proposed Min Size	Proposed Max Size
1 Bed	10	50	51	54
2 Bed	10	61	71	78
3 Bed	2	74	79	89
Total	22	-	-	-

33. Building SH-8 continues the transition to the lower surrounding buildings. The materiality comprises a mix of contrasting materials, layered brick work and dark metals and would be composed of a double height simple grid system, with recessed balconies.

*Building SH-9*

34. SH-9 is an 8 storey (42.2m AOD) building comprising Class B1 office floorspace. It is located at the southern end of the Sampson House site which adjoins the railway viaduct and The Low Line public route to the west, Southwark Street to the south and 144 Hopton Street to the west.

*Public realm and cultural space*

35. The proposed development would also provide an enhanced public realm, landscaping and cultural space with the cultural space being located within the basement of the site with an access from the new cultural square adjacent to the river and Blackfriars Station at the north of the site. With regards to the public realm, the development would deliver five key new character areas at ground floor level as follows:
- The Cultural Square: provides the principal civic space for the development and is located between SH-5, the railway viaduct, SH-4 and Blackfriars Station. The space is intended to be a lively space where residents, workers and visitors can converge;
  - Hopton Garden: this space is central to the scheme and provides two overlapping spaces that wrap around the southern and eastern facades of SH-5 and will provide a local verdant greenspace which fronts onto Hopton Street;
  - Hopton Yard: located between SH-7, SH-8 and SH-5, this space is in contrast to Hopton Garden and is a hard-urban space which will form both a destination and transitional space between Hopton Street and the arches and passageways along and through the viaduct. Enclosed by a retail colonnade to the south of SH-7 and SH-8 and retail to the north and west within the hotel and viaduct respectively, the yard will provide a pocket park, a shared surface environment which serves as the arrival court at the entrance of the proposed hotel and a hard-landscaped open space which will allow spill out areas for the surrounding cafes;
  - The Low Line: located between the Stamford Street route and the Central Square, the central nature of this route will make use of the viaduct fabric itself and will form an open-air colonnade, revealing the arches; and
  - Hopton Street: respecting the principles set out in the extant planning permission which changes the traffic direction from two-way to one-way along Hopton Street, the proposals as part of this scheme will maintain this, but will bring enhancements such as new tree planting, reduced carriageway width, on-street car parking and spaces for cycle hire docking stations, along with Sheffield Stands for cyclists.



Image – Public realm areas



### Planning history

36. See Appendix 1 for further information on the relevant planning history of the application site.

### KEY ISSUES FOR CONSIDERATION

#### Summary of main issues

37. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use;
  - Environmental impact assessment;
  - Tenure mix, affordable housing and viability ;
  - Dwelling mix including wheelchair housing;
  - Density;
  - Quality of residential accommodation;
  - Design, layout, heritage assets and impact on Borough and London views;
  - Landscaping and trees;
  - Outdoor amenity space, children’s playspace and public open space;
  - Impact of proposed development on amenity of adjoining occupiers and surrounding area;
  - Transport and highways;
  - Noise and vibration;
  - Energy and sustainability;
  - Ecology and biodiversity;
  - Air quality;

- Ground conditions and contamination;
- Water resources and flood risk;
- Archaeology;
- Wind microclimate;
- Health
- Aviation;
- Television and radio signals;
- Socio-economic impacts;
- Planning obligations (S.106 undertaking or agreement);
- Mayoral and borough community infrastructure levy (CIL);
- Community involvement and engagement;
- Consultation responses, and how the application addresses the concerns raised;
- Community impact and equalities assessment;
- Human rights;
- Positive and proactive statement, and;
- Other matters

38. These matters are discussed in detail in the 'Assessment' section of this report.

### **Legal context**

39. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2016, the Core Strategy 2011, and the Saved Southwark Plan 2007.
40. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

### **Planning policy**

41. The statutory development plans for the Borough comprise the National Planning Policy Framework 2019, London Plan 2016, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007 - July). The site falls within the area covered by the Blackfriars Road SPD.
42. The site is located within the:
- Central Activities Zone (CAZ)
  - Bankside, Borough and London Bridge Opportunity Area
  - Borough, Bermondsey and Rivers Archaeological Priority Zone
  - Air Quality Management Area
  - Borough and Bankside District Town Centre
  - Bankside, Borough and London Bridge Strategic Cultural Area
  - The Thames Special Policy Area
43. The site has a Public Transport Accessibility Level (PTAL) of 6b and is located within Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding.
44. The following Grade listed buildings are close to the site:
- 61 Hopton Street (Grade II)
  - Hopton Street Almshouses (Grade II\*)
  - 124 & 126 Southwark Street (Grade II)

- 1 & 3-7 Stamford Street (Grade II)
  - Blackfriars Bridge (Grade II)
45. The site does not sit within any of the London View Management Framework protected views. The following Conservation Areas are nearby:
- Old Barge House Alley to the west of the site (split between the boroughs of Southwark and Lambeth)
  - Bear Gardens to the east of the site (east of the Globe Theatre)
  - Kings Bench to the south east of the site (south of Union Street)
  - Whitefriars Conservation Area is located across the river, within City of London.

#### National Planning policy Framework (NPPF)

46. The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.
47. Chapter 2 Achieving sustainable development  
 Chapter 5 Delivering a sufficient supply of homes  
 Chapter 6 Building a strong, competitive economy  
 Chapter 7 Ensuring the vitality of town centres  
 Chapter 8 Promoting healthy and safe communities  
 Chapter 9 Promoting sustainable transport  
 Chapter 11 Making effective use of land  
 Chapter 12 Achieving well-designed places  
 Chapter 14 Meeting the challenge of climate change, flooding and coastal change  
 Chapter 15 Conserving and enhancing the natural environment  
 Chapter 16 Conserving and enhancing the historic environment

#### London Plan 2016

48. Policy 2.5 Sub-regions  
 Policy 2.10 Central Activities Zone – Strategic priorities  
 Policy 2.11 Central Activities Zone – Strategic functions  
 Policy 2.13 Opportunity Areas and intensification areas  
 Policy 2.15 Town Centres  
 Policy 3.1 Ensuring equal life chances for all  
 Policy 3.8 Housing choice  
 Policy 3.9 Mixed and balanced communities  
 Policy 3.10 Definition of affordable housing  
 Policy 3.11 Affordable housing targets  
 Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes  
 Policy 3.13 Affordable housing thresholds  
 Policy 4.1 Developing London's economy  
 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 5.1 Climate change mitigation

Policy 5.2 Minimising carbon dioxide emissions

Policy 5.3 Sustainable design and construction

Policy 5.5 Decentralised energy networks

Policy 5.6 Decentralised energy in development proposals

Policy 5.7 Renewable energy

Policy 5.9 Overheating and cooling

Policy 5.10 Urban greening

Policy 5.11 Green roofs and development site environs

Policy 5.12 Flood risk management

Policy 5.13 Sustainable drainage

Policy 5.15 Water use and supplies

Policy 5.16 Waste net self-sufficiency

Policy 5.17 Waste capacity

Policy 5.18 Construction, excavation and demolition waste

Policy 5.21 Contaminated land

Policy 6.1 Strategic approach (Transport)

Policy 6.2 Providing public transport capacity and safeguarding land for transport

Policy 6.3 Assessing effects of development on transport capacity

Policy 6.5 Funding Crossrail

Policy 6.6 Aviation

Policy 6.9 Cycling

Policy 6.10 Walking

Policy 6.11 Smoothing traffic flow and tackling congestion

Policy 6.12 Road network capacity

Policy 6.13 Parking

Policy 7.1 Building London's neighbourhoods and communities

Policy 7.2 An inclusive environment

Policy 7.3 Secured by design

Policy 7.4 Local character

Policy 7.5 Public realm

Policy 7.6 Architecture

Policy 7.7 Location and design of tall and large buildings

Policy 7.8 Heritage assets and archaeology

Policy 7.10 World heritage sites

Policy 7.11 London View Management Framework

Policy 7.12 Implementing the London View Management Framework

Policy 7.14 Improving air quality

Policy 7.15 Reducing noise and enhancing soundscapes

Policy 7.21 Trees and woodlands

Policy 8.2 Planning obligations

Policy 8.3 Community infrastructure levy

The Core Strategy 2011

49. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are:

Strategic Targets Policy 1 - Achieving growth

Strategic Targets Policy 2 - Improving places

Strategic Policy 1 - Sustainable development

Strategic Policy 2 - Sustainable transport

Strategic Policy 3 - Shopping, leisure and entertainment

Strategic Policy 6 - Homes for people on different incomes

Strategic Policy 10 - Jobs and businesses

Strategic Policy 11 - Open spaces and wildlife

Strategic Policy 12 - Design and conservation

Strategic Policy 13 - High environmental standards

The Southwark Plan 2007 (Saved policies)

50. In 2013, the council resolved to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated by the Core Strategy with the exception of Policy 1.8 (location of retail outside town centres). Paragraph 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. The relevant policies of the Southwark Plan 2007 are:

Policy 1.1 Access to Employment Opportunities

Policy 1.4 Employment Sites

Policy 1.7 Development within Town and Local Centres

Policy 2.5 Planning Obligations

Policy 3.1 Environmental Effects

Policy 3.2 Protection of Amenity

Policy 3.3 Sustainability Assessment

Policy 3.4 Energy Efficiency

Policy 3.6 Air Quality

Policy 3.7 Waste Reduction

Policy 3.8 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 Conservation of the Historic Environment  
 Policy 3.16 Conservation Areas  
 Policy 3.17 Listed Buildings  
 Policy 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites  
 Policy 3.19 Archaeology  
 Policy 3.20 Tall Buildings  
 Policy 3.22 Important Local Views  
 Policy 3.28 Biodiversity  
 Policy 3.29 Development within the Thames Policy Area  
 Policy 3.31 Flood Defences  
 Policy 5.1 Locating Developments  
 Policy 5.2 Transport Impacts  
 Policy 5.3 Walking and Cycling  
 Policy 5.6 Car Parking  
 Policy 5.7 Parking Standards for Disabled People and the Mobility Impaired  
 Policy 5.8 Other Parking

Supplementary Planning Documents

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

Greater London Authority Supplementary Guidance

52. Affordable Housing and Viability SPG 2017  
 Central Activities Zone SPG 2016  
 Crossrail Funding SPG 2016  
 Housing SPG 2016  
 London View Management Framework 2012  
 London's World Heritage Sites SPG 2012  
 Providing for Children and Young People's Play and Informal Recreation 2008  
 Sustainable Design and Construction SPG 2014

**Emerging policy**

Draft New London Plan

53. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2 March 2018. Minor suggested changes to the plan were published on 13 August 2018 and an Examination in Public (EIP) began on 15 January 2019 and closed in May 2019.

The Inspector's report and Panel Recommendations were issued to the Mayor of London

in October 2019. The Mayor then issued his intentions to publish the London Plan along with a statement of reasons for not including all of the Inspector's recommendations to the Secretary of State. The Secretary of State will respond to the Mayor, due before 17 February 2020. Until the London Plan reaches formal adoption it can only be attributed limited weight.

#### New Southwark Plan (NSP)

54. For the last five 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. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 consultation closed in May 2019.

The New Southwark Plan Submission Version – Proposed Modifications for Examination was submitted to the Secretary of State in January 2020 for Local Plan Examination. It is anticipated that the plan will be adopted in late 2020 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.

### **ASSESSMENT**

#### **Principle of the proposed development in terms of land use**

##### *Introduction*

55. The Sampson House office building accommodated large, deep and poorly lit floorplates that were designed to support the function as a cheque clearing centre, and later disaster recovery centre. The use as a disaster recovery centre (accommodating essential staff whilst their main offices are unavailable) meant that there were very few people routinely employed at the site and job numbers were disproportionately low relative to the overall size of the building. The building was inflexible in terms of its design and unattractive to modern office users which is why the principle of replacing the building was accepted on the consented scheme. The proposed development would provide a high density mixed use scheme creating new homes, office space, jobs, leisure and retail opportunities all supported by a new public realm with green spaces new routes and improved connectivity. The range of uses being proposed is suitable for the site's location within the Central Activities Zone, Town Centre and Opportunity Area.
56. The National Planning Policy Framework (NPPF) was updated in 2019. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development to deliver homes.
57. The NPPF promotes the delivery of a wide choice of high quality homes, seeks to widen opportunities for home ownership and create sustainable, inclusive and mixed communities. It encourages the effective use of land by reusing land that has been previously developed and also promotes mixed use developments.
58. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

##### *London Bridge, Borough and Bankside Opportunity Area*

59. The London Plan designates Bankside, Borough and London Bridge as one of four

Opportunity Areas in the London South Central area.

60. The London Plan notes that this area has considerable potential for intensification and scope to develop the strengths of the area for strategic office provision as well as housing, especially in the hinterland between Blackfriars and London bridges. Mixed leisure and culture related development should enhance its distinct offer as part of the South Bank Strategic Cultural Area and this should include visitor accommodation. This is further reflected in Policy SD2 – Opportunity Areas of the New London Plan which increases the indicative target for new homes to 4,000 and sets a figure for new jobs of 5,500.
61. Strategic Targets Policy 2 of the Core Strategy underpins the London Plan and states that Southwark’s vision for Bankside, Borough and London Bridge is to continue to provide high quality office accommodation, world-class retail, tourism, cultural and entertainment facilities including the delivery of 1900 new homes, 665 affordable homes and around 25,000 jobs by 2026.

*Central Activities Zone and Borough and Bankside District Town Centre*

62. The site is located within the CAZ which covers a number of central boroughs and is London’s geographic, economic, and administrative core. Strategic Targets Policy 2 – Improving Places of the Core Strategy states that development in the CAZ will support the continued success of London as a world-class city as well as protecting and meeting the more local needs of the residential neighbourhoods. It also states that within the CAZ there will be new homes, office space, shopping and cultural facilities, as well as improved streets and community facilities.
63. In addition, the site is part of the Borough and Bankside District Town Centre where saved policy 1.7 of the Southwark Plan states that within the centre, developments will be permitted providing a range of uses, including retail and services, leisure, entertainment and community, civic, cultural and tourism, residential and employment uses. Strategic Policy 3 of the Core Strategy advises that the network of town centres will be maintained and that within Borough and Bankside district town centre, the council will support the provision of new shopping space.

*Blackfriars Road SPD*

64. The adopted Blackfriars Road SPD sets out (Para. 2.2.3) the vision for Blackfriars Road which is:
65. *“Blackfriars Road will be transformed into a vibrant place where people will want to work, live and visit. The historic, wide boulevard will provide a range of different activities, regenerating the area from the river along Blackfriars Road and stimulating change at the Elephant and Castle.”*
66. The Blackfriars Road SPD aspiration for the area is to have a mix of shops, offices and services. It expects opportunities to increase the amount and type of development to be maximised, especially opportunities for flexible innovative business space and town centre uses which include hotels and new homes.
67. The SPD also outlines the suitability of the northern end of Blackfriars Road as a location for tall buildings. The SPD specifically refers to the area around the junction of Blackfriars Road, Stamford Street and Southwark Street.

*Bankside, Borough and London Bridge Strategic Cultural Area*

68. The Strategic Cultural Area recognises the concentration of existing attractions within the north of the borough and links in with other attractions in Lambeth, Westminster, the City



and Tower Hamlets. The area has been designated to protect and enhance the provision of arts, culture and tourism.

Conclusion on policy designations

69. The principle of a large scale development containing a mix of uses including housing, retail, hotel, offices and cultural uses would support the role and functioning of the Central Activities Zone and the Borough and Bankside District Town Centre as well as being consistent with the policies for the Opportunity Area and the implemented consent. The acceptability of each of the individual uses is considered below.

*Offices*

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

Image – Office building



71. Core Strategy Strategic Policy 10 Jobs and Businesses states that the council will increase the number of jobs in Southwark and create an environment in which businesses can thrive. The policy goes on to state that existing business floorspace would be protected and the provision of around 400,000sqm-500,000sqm of additional business floorspace would be supported over the plan period in the Bankside, Borough and London Bridge Opportunity area to help meet central London's need for office space.
72. Saved Policy 1.4 Employment sites outside the Preferred Office Locations and Preferred Industrial Locations is also relevant, and states that development will be permitted provided that the proposal would not result in a net loss of floorspace in Class B use. An exception to this may be made where:
- The applicant can demonstrate that convincing efforts to dispose of the premises, either for continued B Class use, or for mixed uses involving B Class, including redevelopment, over a period of 24 months, have been unsuccessful; or
  - the site or buildings would be unsuitable for re-use or redevelopment for B Class use or mixed use, having regard to physical or environmental constraints; or
  - the site is located within a town or local centre, whereby suitable Class A or other town centre uses will be permitted in the place of Class B uses.
73. The proposal does not meet any of the exceptions criteria listed within the policy, in that

prior to demolition of the existing building it was beneficially occupied and the site was suitable for continued office use. The proposed development would provide 8,054sqm (GIA) of Class B1 office floorspace whilst the former Sampson House comprised 56,887sqm of Class B1 office floorspace. The development therefore results in a significant reduction in employment floorspace of 48,833sqm.

74. Sampson House was a poor quality office building with deep inefficient floorplates, limited access to natural light and natural ventilation and limited floor to ceiling heights. As such, in granting the previous consent, it was accepted that Sampson House would likely only be attractive to temporary users such as disaster recovery with a very low number of people employed at the site. The principle of the loss of the existing Sampson House office building and replacement with a smaller, higher quality office building more tailored to current office users' needs has been accepted through the extant consent and Sampson House is now in the advanced stages of demolition. As such the extant consent is a material consideration with some weight. The conflict with Saved Policy 1.4 is noted, but must be balanced against the need for homes, the employment provided in the proposed hotel, and the weight which can be attached to the implemented consent. There has been no material change in planning policy since the decision was made on the extant consent and as such the principle of losing the office space is still considered acceptable.
75. The previous consent included clauses within the S106 Agreement to secure the timely delivery of the new office space as well as enhanced employment and training contributions to offset the loss of employment floorspace and this will be continue to be secured if the current application is approved.

#### *Hotel*

76. The London Plan, as well as both the Core Strategy and the Saved Southwark Plan support the development of hotels within Opportunity Areas, Town Centres and Strategic Cultural Areas. The London Plan specifically seeks approximately 40,000 additional hotel bedrooms by 2031 with a particular focus on the CAZ.
77. The Blackfriars Road SPD encourages a range of other town centre uses which include hotels. SPD2 of the SPD encourages this mixed use nature and states:
78. *We will encourage the provision of town centre uses to help enhance the commercial attractiveness of Blackfriars Road, supporting proposals for new hotels and other forms of visitor accommodation (Class C1) to ensure there is a good supply of accommodation for visitors and to contribute to a mix of uses and employment opportunities. Proposals should seek to maximise the opportunity to include activity along the lower and street level frontages."*
79. Saved policy 1.12 – Hotels, of the Southwark Plan also encourages hotels and visitor accommodation in areas with high public transport accessibility. This policy makes specific reference to the fact that hotels will not be permitted where they would result in a loss of existing residential accommodation, or an over dominance of visitor accommodation in the local area.
80. Whilst it is clear that current policy supports visitor accommodation in this location, the Planning Committee refused permission for a new hotel at the nearby site of 160 Blackfriars Road in December 2018 (Ref 18/AP/1215). One of the reasons for refusal related to the perceived over-concentration of visitor accommodation as set out below:
81. *The proposed development would lead to an over dominance of visitor accommodation in the locality which would detract from the vitality of the area and harm the local character,*

*and would reduce the potential for other services and uses to be provided for the benefit of residents and visitors. As such the proposal would be contrary to saved policy 1.12 – Hotels and Visitor Accommodation of the saved Southwark plan (2007) and policy SP10 ‘Jobs and businesses’ of the Core Strategy 2011.*

82. The applicant appealed against the council’s decision to refuse planning permission and whilst the appeal was dismissed the Planning Inspector was clear that whilst the London Plan targets for visitor accommodation in Southwark had been exceeded, this was not the same as demonstrating over-dominance. The Inspector also noted that an additional hotel on the appeal site would not result in a significant change in character for the locality, noting that even taking the appeal site in combination with other existing and permitted developments, the addition of one further hotel would not unduly compromise the balance of local land uses.
83. The hotel proposed within the current application is different from the appeal scheme in that it forms part of a much larger, comprehensive mixed use development and as such would not dominate the local area or displace other land uses. Furthermore the proposed hotel sits immediately adjacent to Blackfriars Station in a highly accessible location close to the riverside and the various visitor attractions of the Southbank. A hotel is therefore considered an appropriate and acceptable land use in this location that is fully compliant with development plan policy and would not harm the character of the area or create an over-dominance of visitor accommodation.

#### *Retail*

84. The development would include new retail units (A1/A2/A3/A4) at ground floor level of all buildings. In total, 1,436sqm (GIA) of retail floorspace is proposed.
85. The provision of new town centre uses such as retail is supported by saved Southwark Plan Policy 1.7 since the site lies in a town centre. The retail units would activate the ground floor of the development, particularly on Hopton Street and the railway viaduct. The retail units would serve the proposed increase in population and contribute to the vitality and viability of the district town centre. The site previously had a very harsh and inactive frontage whereas the proposal would create a much more attractive and vibrant street environment with retail opening out onto streets and the newly formed public space, with opportunities to provide tables and chairs outside. The amount and type of provision is considered to be acceptable and would help to meet the needs of residents, workers and visitors in the area.
86. In order to protect the amenities of the area, it is suggested that a cap be placed on the amount of floorspace that could be used for Class A4 (drinking establishments). A condition would be attached to this effect.

#### *Cultural venue*

87. The proposal would include the provision of cultural floorspace within the basement, basement mezzanine and ground floor area of building SH-5 which would open out onto a new public space at the northern end of the side with access onto the Thames Path. The provision of cultural space is supported given the Strategic Cultural Area designation and accordingly is a positive aspect of the scheme that would complement the existing cultural offerings on the Southbank. As a Class D1/D2 use, the space could be used as an art gallery, museum, cinema or other leisure space.

#### *Housing*

88. The proposed development would provide 341 new homes which is supported by the London Plan, the saved Southwark Plan and the Core Strategy. This represents an uplift of 109 units in comparison to the extant scheme on the Sampson House site.

89. London Plan Policy 3.3 - Increasing Housing Supply sets a minimum target of 27,362 additional homes to be provided in Southwark over a period from 2015-2025. A specific target of 1,900 homes is given for the Opportunity Area under the current London Plan however this is increased to 4,000 new homes under the Draft London Plan. Strategic Policy 5 of the Core Strategy seeks high quality new homes in attractive environments. It states that development will provide as much housing as possible whilst also making sure that there is enough land for other types of development. The policy sets a target of 24,450 net new homes between 2011 and 2026. The New Southwark Plan sets a target of 23,550 net new homes by 2028/2029. A key objective of the overall development plan is to provide as much new housing as possible and create places where people would want to live.
90. The proposed 341 new homes would include 37 affordable homes and together they would contribute towards meeting an identified housing need which accords with local, regional and national policy priorities. Issues relating to the quality of accommodation and affordable housing are discussed further below.

#### Conclusions on land use

91. The proposal involves the provision of high quality office floorspace alongside a range of acceptable town centre retail, hotel and cultural uses. The provision of housing is supported at national, regional and local levels and would represent a significant and positive contribution towards housing need. It is noted that there would be a significant reduction in employment floorspace compared to the previous Sampson House office building, however the principle of accepting the loss of office floorspace was accepted on the consented scheme where the substantial loss on the Sampson House side was balanced to a degree by the substantial high quality office provision on the Ludgate House side. Overall, the provision of a modern, high quality office is considered to be a benefit of the scheme and will facilitate a growth of employment numbers across both the Ludgate and Sampson sites.
92. The proposed development includes a mix of uses that are considered to be appropriate for the site's location within the CAZ, Opportunity Area, Strategic Cultural Area and district town centre. As well as the retail and cultural uses, which would support the cultural and visitor functions of the area, it would provide a significant number of new homes, which is a priority of the current Government as well as local and London-wide planning policies.

#### **Affordable workspace**

93. When the extant permission was determined, there was no policy requirement to provide any of the proposed workspace as affordable space. However, emerging policies of the London Plan and New Southwark Plan require a proportion of new Class B1 floorspace to be made available on affordable terms for occupiers who may otherwise not be able to access space in Southwark.
94. Draft London Plan Policy E2 - Providing suitable business space, seeks the provision of low cost B1 business space to meet the demand of micro to medium sized business as well as start ups and enterprises looking to expand. The policy is clear that proposals for new B1 spaces over 2500sqm in size (or a locally deemed lower threshold) should consider the provision of a proportion of workspace that would be suitable for these target businesses.
95. Draft London Plan Policy E3 relates specifically to affordable workspace and states that "In defined circumstances, planning obligations may be used to secure affordable

workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purposes”. The policy identifies the circumstances in which it would be appropriate to secure affordable space. Part B of the policy specifically identifies the CAZ as an important location for securing low cost space for micro, small and medium sized enterprises.

96. Emerging Policy P30 of the New Southwark Plan deals with affordable workspace. Criterion 2 of the policy requires Major ‘B Use Class’ development proposals to deliver at least 10% of the floorspace as affordable workspace on site at a discounted market rent for a period of at least 30 years. The policy recognises that there are many different forms that such space could take depending on the site location, characteristics and existing/proposed uses on site. Only where on-site provision would be impracticable are developers permitted to make an in lieu payment
97. Taking into account the requirements of emerging policy P30, the proposed development would need to provide at least 596sqm of affordable workspace. The applicant proposes to meet this requirement and has proposed 595sqm of affordable workspace within the office building (SH-9). As such the quantum of affordable workspace being provided is compliant with the emerging London Plan and New Southwark Plan policies.
98. In order to ensure the space is attractive to potential occupiers, conditions will be imposed requiring the affordable workspace to be fitted out to a minimum specification and for the common facilities (such as the bike store, showers and lifts) to remain accessible to staff throughout the lifetime of the affordable workspace unit.
99. In addition, the Section 106 Agreement will include a dedicated ‘affordable workspace’ schedule. This will ensure, among other things, that:
  - the workspace is provided for a 30-year period at a rate of £30 psf (indexed) which equates to a 51% reduction on the market rent level;
  - no more than 50% of the market rate floorspace can be occupied until the affordable workspace has been fitted-out ready for occupation;
  - a Management Plan is in place to secure the appointment of a Workspace Provider and a methodology for that Provider to support the occupiers;
  - appropriate marketing of the affordable workspace will be conducted;
  - the rates and service charges payable by the tenant will be capped, and;
  - a rent-free period is offered to incentivise uptake.

### **Affordable housing**

#### Proposed offer

100. The applicant proposes a combined offer of 37 on site affordable homes alongside the £35.5million affordable housing payment agreed on the previous consent and a further payment in lieu of £3 million.

#### Policy context

##### *National*

101. The NPPF (2019) states that local planning authorities should set policies for affordable housing need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.

*Regional*

102. The regional policies and guidance relating to affordable housing are set out in the London Plan and the Mayor's housing supplementary planning guidance (2016). The key relevant policies within the London Plan in relation to affordable housing are:
103. Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes:
104. Part A of the policy requires that the maximum reasonable amount of affordable housing should be sought with regard to a number of factors including:
- current and future requirements for affordable housing
  - the need to encourage rather than restrain development
  - the need to promote mixed and balanced communities
  - the specific circumstances of individual sites
  - resources available to fund affordable housing, to maximise affordable housing output and the investment criteria set by the Mayor
  - the priority to be accorded to provision of affordable family housing
105. Part B of the policy sets out that negotiation on sites should take account of their individual circumstances including development viability.

Image - Affordable housing block



106. Part C of the policy sets out that affordable housing should normally be provided on-site. In exceptional cases where it can be demonstrated robustly that this is not appropriate in terms of the policies in this Plan, it may be provided off-site. A cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering the

affordable housing and other policies in this Plan and should be ring-fenced and, if appropriate, pooled to secure additional affordable housing either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing.

107. The supporting text in paragraph 3.74 repeats part C of the policy setting out that in exceptional circumstances an off-site or payment in lieu contribution may be accepted. Where a payment in lieu contribution is acceptable the text sets out that it should be ring fenced, and if appropriate 'pooled', to secure efficient delivery of additional affordable housing on identified sites elsewhere. These exceptional circumstances include those where, it would be possible to:
- secure a higher level of provision
  - better address priority needs, especially for affordable family housing
  - secure a more balanced community
  - better sustain strategically important clusters of economic activities, especially in parts of CAZ.

#### *Local*

108. The local policies are saved Southwark Plan Policy 4.4 Affordable housing, and Core Strategy Strategic Policy 6 – Homes for people on different incomes. Further guidance on how to implement the policies is contained within the council's adopted Affordable Housing SPD 2008 and draft Affordable Housing SPD 2011.
109. Core Strategy Strategic Policy 6 'Homes for people on different incomes' requires as much "affordable housing on developments of 10 or more units as is financially viable". It also sets a minimum target of 8,558 net affordable homes between 2011 and 2026. It requires a minimum of 35% of affordable housing on developments with 10 or more units.
110. Saved Southwark Plan Policy 4.4: Affordable housing, is used alongside the overarching Core Strategy policy 6. Parts iv) and vi) of the policy require that:
- iv). the affordable housing provided must be an appropriate mix of dwelling type and size to meet the identified needs of the borough.
- vi). A tenure mix of 70:30 social rented: intermediate housing ratio for the Central Activities Zone.
111. The council's adopted Affordable Housing SPD 2008 (Section 3.6) together with the draft Affordable Housing SPD 2011 (section 6.3) clarifies the Southwark Plan and Core Strategy policy framework and sets out the approach in relation to securing the maximum level of affordable housing from developments. Specifically, it sets out the sequential tests relating to the delivery of affordable housing as:
- On site provision: All housing, including affordable housing should be located on the development site.
  - Off site provision: In exceptional circumstances, where affordable housing cannot be provided on site or where it can be demonstrated that significant benefits will be gained by providing units in a different location in the local area, the affordable housing can be provided on another site.
  - In lieu payment: In very exceptional circumstances where it is accepted that affordable housing cannot be provided on-site or off-site, a payment towards the delivery of affordable housing will be required.
112. It is therefore expected that the applicant show that the steps as set out above are followed in order to demonstrate that exceptional circumstances exist sufficient to justify



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

113. In line with the SPDs, a financial appraisal was submitted to allow an assessment of the maximum level of affordable housing that could be supported by the development. The appraisal was reviewed by Avison Young on behalf of the council. Following the review of the appraisal and the assessment of a number of options testing affordable housing delivery, it has been concluded that based on the development plan as a whole and the extant scheme, the best approach is for affordable housing to be provided as a combination of on site delivery and an in lieu payment.

*On-site provision*

114. The developer proposes to deliver 37 on-site affordable homes as set out in the table below:

Unit Type	Intermediate (London Living Rent)	Social Rent	Total Units	Total hab rooms
1 Bed	4	10	14	28
2 Bed	11	10	21	69
3 Bed	0	2	2	8
Total	15	22	37	105

115. The consented scheme provided 986 habitable rooms and the proposed development would provide a total of 1,206 habitable rooms. As such the proposed development would result in an uplift of 220 habitable rooms. The proposed on site affordable housing would equate to an 8.7% affordable housing provision on site, although it must be recognised that it represents 48% of the uplift in habitable rooms from the extant permission. It is noted that the split between social rented and intermediate is not in line with the 70:30 split required by policy. The social rented homes are located in a dedicated block which is entirely made up of social rented units. This will meet Registered Providers' needs with regards to separate cores and the ability to control and minimise service charges. As a result of the specific needs of Registered Providers in that regard the developer does not consider it possible to incorporate any additional social rented homes in the other residential blocks to bring the split in line with policy. The intermediate units are provided at London Living Rent levels, which are set annually by the Mayor for each Ward in London. For the current year 2019/2020 the monthly rents for Borough and Bankside are a maximum of £1120 for a one bed flat and £1245 for a two bed flat (inclusive of service charges). This is generally a more affordable product than some other forms of intermediate housing such as Discount Market Rent or Shared Ownership, which in the Bankside area are more difficult to secure at a price accessible to many in housing need. Overall the proposed split of 55:45 is considered acceptable as the payment in lieu will feed into the councils new homes building programme which will allow a greater proportion of social rented homes to be provided.

*The justification for providing and in lieu payment*

116. As part of the affordable housing offer, the applicant is proposing to make a total in lieu

payment of £38.5 million. This is made up of the £35.5 million in lieu payment accepted as part of the consented scheme and a further £3 million that has been identified as a viability surplus through detailed negotiations and viability testing. The justification of this in lieu payment needs to consider the individual circumstances of this development.

117. As set out earlier in this report, planning consent was granted in 2014 for the redevelopment of the sites known as Sampson House and Ludgate House. The affordable housing offer that was accepted for that development was a payment in lieu of £65 million and this was to be apportioned across the Ludgate phase and the Sampson phase. The original s106 agreement set out the payments due related to the stages of delivery of each part of the development. As such the total £65 million in lieu payment that was agreed on the original planning permission was split between the two sites relative to the size of development on each side of the viaduct, with £29,519,957 due to be paid on the Ludgate House side of the development and £35,480,043 (agreed at £35.5 million) to be paid on the Sampson House site. Subsequently the applicant has decided to deliver the Ludgate House side of the development under the terms of the original permission (as amended) but bring forward a fresh application (under consideration here) for the Sampson House site.
118. At the time of the original application, the commuted sum was justified on the basis that:
- The proposed payment would secure a higher quantum of affordable housing than on-site provision
  - The commuted sum is likely to ensure more affordable family homes are built. The application site is within an area with a requirement for a minimum of 10% family housing, whilst large parts of the rest of the borough have a requirement for a minimum of 20% family housing;
  - The money would be used for new affordable housing which would be council developed and managed, which will subsequently allow greater control over rent levels and management. This could also potentially allow for local lettings – where new housing is let to local residents in priority need, enabling the council to re-let existing homes and create better mobility on estates, and provide people with appropriate housing to suit their needs;
  - The money would be used as part of an agreed programme for the provision of affordable housing.
119. The proposed development on the Sampson House site is comparable to the consented scheme and the reasoned justification for accepting the in lieu payment on the consented scheme remains relevant today. The principle that the agreed in lieu payment could be carried over to the new consent is acceptable provided that it, together with any additional payment and on site affordable housing, can be demonstrated to be the maximum reasonable amount of affordable housing the scheme can support whilst remaining viable. The in lieu payment of £35.5 million should therefore be considered alongside the proposed on-site housing and the additional £3 million in lieu sum.

*Additional in lieu payment*

120. Following additional viability testing and negotiations during the course of the application, an additional surplus of £3 million has been identified that will contribute to additional affordable housing. Extensive viability negotiations have taken place, which were focussed on the additional value of the proposed scheme when compared to the benchmark land value established by the implemented consent. The council's expert advisors, Avison Young, have concluded that the total payment of £38.5 million, plus the 37 affordable housing units delivered on site, when other payment such as Southwark CIL and s106 contributions are taken into account, does represent the most the scheme can support whilst remaining viable and deliverable.

Conclusions on affordable housing

121. The applicants offer constitutes a total payment in lieu of £38.5 million and the provision of 37 affordable homes (105 habitable rooms) on site. The proposed development would provide a total of 1206 habitable rooms and if a figure of £100,000 per habitable room was adopted as the payment in lieu of an affordable habitable room on site then the proposed offer would equate to an overall affordable housing provision of 40.6%. The affordable homes on site are welcomed and will allow affordable housing to be provided in what is a high value area of the borough and a sustainable location. This is welcome improvement on the consented scheme.
122. The money secured through the commuted sum would be used to deliver more affordable housing through the council's directly funded New Homes Building Programme. The council's Cabinet initially pledged to build 1,000 new council homes by 2020. A further commitment has also now been made to build a further 10,000 council homes (therefore 11,000 in total) by 2043. The in-lieu payment secured as part of this application would be paid into the council's Affordable Housing Fund, effectively ring fencing the money to be used to deliver new affordable homes. Money from this fund will be used to deliver the directly funded New Homes Building Programme. At least 81 sites have been identified for development under this programme of which 18 have been competed. The remaining 63 sites are in various stages of planning including application stage, pre-application stage and feasibility studies. Further work is currently being carried out to work up these schemes and to identify further sites. Whilst an applicant is limited to finding sites on the open market, this programme provides the council with the opportunity to provide housing on sites within its ownership or within existing estates which are not appropriate to dispose of on the open market. It provides a coherent strategy for delivering new council homes at affordable social rents to help meet the borough's housing need. The in-lieu payment of £38.5 million could deliver a substantial number of new affordable homes which would be considerably in excess of what could be provided on site given the impact this would have on the overall viability of the development. Accordingly, the acceptability of an in-lieu payment is based on the specific merits of this proposal taking account of all the material considerations highlighted above
123. The original viability assessment included values attached to residential car parking spaces that have now been reduced in number from 105 spaces to 70. In the review of the applicants Financial Viability Assessment prior to the reduction in car parking, the councils appointed consultants Avison Young determined that there would be a scheme surplus of £3 million that could be used to fund affordable housing in addition to the £35.5 million in lieu payment from the consented scheme and the 105 on site affordable habitable rooms. The overall affordable housing offer was viability tested and was considered to be the maximum reasonable amount that could viably be delivered.
124. Subsequent to this, the council continued to negotiate with the applicant to reduce the total number of on-site car parking spaces. This has resulted in the number of residential car parking spaces reducing from 105 spaces to 70 spaces. The space that would formerly have been in use as car parking would revert to back of house functions and bulk residential storage space. The applicant submitted supplementary viability information to try to demonstrate that the reduced level of car parking would reduce sales values and result in homes taking longer to sell and would therefore have a negative impact on the residential Gross Development Value (GDV). Following correspondence between the council's consultant Avison Young and the applicant's consultant Knight Frank, Avison Young have advised that whilst the reduction in car parking could not have a positive impact on the overall value of the scheme, the extent to which it negatively impacts on the GDV is unquantifiable and that there is no clear evidence to substantiate it. The council's consultant is of the view that the impact of a reduction of private car parking on the private residential GDV and sales rates would be negligible. Whilst not

accepting this position, the applicant has agreed to maintain their original offer. As such, based on a private residential GDV of £523,761,600 and a scheme total GDV of £743,086,271, the proposed offer of 105 on-site affordable homes and an in lieu payment of £38.5 million is the maximum reasonable amount of affordable housing that the development can viably provide. The provision of an in-lieu payment alongside 105 affordable habitable rooms on site is therefore fully supported and would be secured as part of the S106 Agreement alongside the relevant early and late stage reviews in order to maximise the provision of affordable housing provided by this development if the scheme becomes more profitable due to reduced costs or increased rents or sales values prior to commencement or during the construction and occupation period.

### **Environmental impact assessment**

125. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary depending on whether the proposal constitutes Schedule 1 (mandatory) or Schedule 2 (discretionary) development of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations and constitutes EIA development having regard to its potential for likely significant environmental effects.
126. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the council has first taken the 'environmental information' into consideration. The 'environmental information' means the ES, including any further information, any representations made by consultation bodies, and any other person, about the environmental effects of the development.
127. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a non-technical summary, environmental statement and technical appendices accompanies the application.

#### *Alternatives*

128. The EIA Regulations requires the ES to provide information on the alternative options considered by the applicant. The 'Do Nothing' alternative would leave the application site in its current state. This scenario is considered in the ES to have no environmental benefits compared with the proposed redevelopment of the site.
129. The ES also describes the design evolution of the scheme which has been influenced by the extant scheme as well as environmental factors including townscape; biodiversity; wind microclimate; daylight and sunlight; impacts on views; and landscaping.

As such, the final version of the scheme has been informed by testing various options and having full regard to the constraints and opportunities presented by the site as well as issues raised during the process.

130. Officers are satisfied that the ES has investigated alternatives for the site and that the proposed development maximises the development potential of the site whilst seeking to minimise environmental impacts. The site occupies a prominent central London location in the Bankside, Borough and London Bridge Opportunity Area and District Town Centre. To not develop the site would lead to a missed opportunity to secure a high quality scheme.

#### *Cumulative impacts*

131. The ES considers cumulative effects arising from the proposed development in combination with other surrounding development schemes during the construction phase

and also once the proposed development is complete and operational. In most cases the cumulative impacts of the development were limited and in line with those established on the previous consent.

#### *Conclusions on the EIA*

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

#### **Housing mix**

133. Saved Policy 4.3 of the Southwark Plan requires a mix of dwellings sizes and types to be provided within major new developments in order to cater for a range of housing needs. There is a particular need for family units in the borough and therefore policy requires that the majority of units should have two or more bedrooms and at least 10% three or more bedrooms with direct access to private outdoor amenity space. At least 10% of the units should be suitable for wheelchair users.
134. Strategic Policy 7 of the Core Strategy increases the proportion of two bed plus accommodation to be provided and expects 60% of developments to have more than two bedrooms, and in this area at least 10% 3, 4, or 5 bedrooms. A maximum of 5% as studios and only for private housing. The mix of units provided is shown in the table below.

	Total Units	Total Units (%)
Studios	17	5%
1 Bed	104	30.5%
2 Bed	183	54%
3 Bed	35	10%
4 Bed	2	0.5%
Total	341	

135. A total of 64.5% of units would have at least two bedrooms which exceeds the 60% target set out in planning policy. 10.5% of units would have three or more bedrooms and this is also fully compliant with current policy which sets a target of 10% in this area of the borough,

#### **Density**

136. Policy 3.4 Optimising Housing Potential of the London Plan states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the Plan. It also requires local context, the design principles and public transport capacity to be taken into account. Strategic Policy 5 – Providing new homes of the Core Strategy sets out the density ranges that residential and mixed use developments would be expected to meet. As the site is located within the Central Activities Zone, a density range of 650 to 1100 habitable rooms per hectare would be sought. In order for a higher density to be acceptable, the development would need to meet the criteria for exceptional design as set out in section 2.2 of the Residential Design Standards SPD.
137. The development as a whole would have a density of 2,152 habitable rooms per hectare. Since the maximum upper limit of 1100hrh would be significantly exceeded, the

development would need to demonstrate that it would provide exemplary accommodation to the highest design standards. If it can be demonstrated that an excellent standard of accommodation would be provided, and the response to context and impact on local services and amenity to existing occupiers is acceptable, then it is considered that the high density in this Opportunity Area location would not raise any issues to warrant withholding permission.

138. As previously mentioned, the acceptability of the site for a high density, mixed use development incorporating tall buildings has already been established by the extant consent. High densities can be a consequence of developing sites with tall buildings as the increase in floorspace vertically significantly exceeds what would be possible by redeveloping a site with low rise buildings. In gauging whether or not it is acceptable for a development to significantly exceed the recommended density levels officers must give weight to the location, public transport availability, quality of design, quality of public spaces, standard of accommodation and other benefits that may follow from the development such as employment. Both the draft New London Plan and New Southwark Plan propose replacing the density matrix is favour of a detailed assessment of the design and quality of the scheme and new homes being provided.
139. There are a number of high quality and high density schemes approved in the area, most notably the redevelopment of 185 Park Street; the One Blackfriars development; 18 Blackfriars; and the combined masterplan for the Sampson House and Ludgate House consented under the extant scheme. The principle of a high density on the site is considered appropriate given the local context and location of the site within the CAZ and an Opportunity Area that has the highest level of public transport accessibility. Furthermore, the proposal is high quality in design, would provide high quality employment floorspace and would provide a generous and high quality public realm. Furthermore, the impacts on the local area, including amenity impacts to neighbouring buildings/occupiers are not so adverse to conclude that the scheme would be considered an overdevelopment of the site. Amenity impacts and quality of accommodation are discussed in more detail later in this report.

### **Wheelchair housing**

140. Policy requires at least 10% of homes as being suitable for wheelchair users. The proposed development would provide 44 units as wheelchair accommodation which equates to a 13% provision thereby exceeding the minimum policy requirement. The wheelchair flats are provided across a range of unit sizes, with 45.5% as one beds, 36.5% as two beds and 18% as three beds. This is considered acceptable and appropriate.

### **Quality of residential accommodation**

141. Saved Policy 4.2 of the Southwark Plan advises that planning permission will be granted provided the proposal achieves good quality living conditions. The adopted standards in relation to internal layout are set out in the adopted Residential Design Standards SPD 2011 (including 2015 Technical Update).
142. The following table sets out the minimum flat size requirements as set out in the Residential Design Standards 2011, and also the flat sizes that would be achieved:

<b>Unit Type</b>	<b>SPD (sqm)</b>	<b>Size Range (sqm)</b>
Studio	37	40
1 Bed (flat)	50	51-67
2 Bed (flat)	61-66	71-129

3 Bed (flat)	74-85	79-228
4 Bed (flat)	90-95	255-279

143. All of the proposed dwellings comfortably meet or exceed the minimum standards and 71% of units would be dual aspect which is positive. All units benefit from storage space and naturally lit and ventilated kitchens. As a high density development the standard of accommodation would need to meet the exemplary criteria as set out below:

<b>Exemplary residential design criteria from Southwark Residential Design Standards SPD</b>	<b>Commentary</b>
Provide for bulk storage	1,824sqm of bulk storage would be provided at basement level across the site.
Exceed minimum privacy distances	The minimum separation distances set out in the SPD have been met.
Good sunlight and daylight standards	The daylight and sunlight assessment demonstrates that a good standard of daylight and sunlight would be achieved across the development.
Exceed minimum ceiling heights of 2.3m	All units would exceed this standard.
Exceed amenity space standards (both private and communal)	The proposed amenity space is set out in detail further below. Whilst there would be a small shortfall on some private amenity spaces, this is generally restricted to the one and two bedroom units and would be compensated by the large areas of communal amenity space that would be provided that significantly exceed the SPD requirements.
Secure by Design certification	The scheme should achieve Secure by Design accreditation. Conditions to require this are recommended.
No more than 5% studio flats	This standard has been met and no more than 5% of units would be studio apartments.
Maximise the potential of the site	The potential of the site would be maximised, providing a large scale mixed use development with new retail, hotel, cultural use and affordable homes.
Include a minimum 10% of units that are suitable for wheelchair users	This standard has been exceeded.
Have excellent accessibility within buildings	Accessibility within the buildings is considered to meet this criteria.
Have exceptional environmental performance	The environmental performance would be fully policy compliant, taking into account a contribution to the Southwark Green Fund.
Minimise noise nuisance between flats by stacking floors so that bedrooms are above bedrooms, lounges above lounges	Accommodation is generally stacked to minimise disturbance and noise transfer will be further mitigated by condition.
Make a positive contribution to local context, character and communities	The proposed development would make a positive contribution to local context,

	character and communities in terms of its quality of design and regeneration benefits including affordable housing, retail and Class D1 space as well as opening up a new section of the low line and improving connectivity with generous public spaces.
Include a predominance of dual aspect units	71% of the units would be dual aspect and there would be no north facing single aspect units.
Have natural light and ventilation in all kitchens and bathrooms	The vast majority of kitchens would have access to natural light and ventilation.
At least 60% of units contain two or more bedrooms	This standard has been exceeded.
Significantly exceed the minimum floor space standards	All units would meet the space standards, and many would exceed them, some to a significant degree.
Minimise corridor lengths by having additional cores	This has been achieved through having four residential buildings.

144. The proposed development provides accommodation that is considered to be of an exemplary standard, particularly in relation to the large apartments, and that this is sufficient to support the high level of density on the site.

#### **Internal daylight**

145. Of the 800 rooms tested within the proposed development, 95.2% meet or exceed the required minimum Average Daylight Factor for the room type. Of the 38 rooms that do not meet the minimum ADF requirement, a large number either:
- i. are not the primary living area (17 are bedrooms), or
  - ii. are living areas that, whilst falling short of the ADF recommended levels, meet the recommended levels of NSL, or
  - iii. are open plan kitchen/living/dining rooms which achieve the recommended levels of ADF for a living room (1.5%) but fall short of those recommended for a kitchen (2%) (8 living/kitchen/dining rooms).
146. It is therefore considered that the proposed units would achieve a good standard of internal daylight.

#### **Private and communal amenity space**

147. All new residential development must provide an adequate amount of useable outdoor amenity space. The Residential Design Standards SPD sets out the required amenity space standards which can take the form of private gardens and balconies, shared terraces and roof gardens. The London Plan requires new developments to make provision for play areas based on the expected child population of the development.
148. In terms of the overall amount of amenity space required, the following would need to be provided:
- For units containing 3 or more bedrooms, 10sqm of private amenity space as required by the SPD;
  - For units containing 2 bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal gardens;
  - 50sqm communal amenity space per block as required by the SPD; and



- 10sqm of children's play space for every child space in the development as required by the London Plan

149. All of the proposed units have at least 5sqm of private amenity space and each block provides in excess of 50sqm of communal amenity space. Where the full recommended provision of 10sqm per residential unit has not been provided, the shortfall has been added to the communal requirement. In this case, a total of 1,111sqm communal space would need to be found. This 1,111sqm comprises of 50sqm per residential block (200sqm) plus the shortfall in private amenity space (911sqm). The proposed development would provide a total of 1,905sqm of communal amenity space which would comfortably exceed the policy requirement taking into account the communal amenity space requirement and the shortfall on private amenity space requirement,

### Children's play space

150. Children's play space is being provided across the site to serve all buildings. Rooftop/terrace play is provided on buildings SH4, SH7 and SH8 in addition to a playground at the new Hopton Street Park and a teenage playspace within the railway arches which is to be shared with the Ludgate House development as set out in the extant scheme.

Image – Amenity space areas



151. At the time of submission, the proposed development proposed 460sqm of child play space which was policy compliant across all age groups. In July 2019, during the course of the application, the GLA updated the playspace standards and the requirement for the proposed development is now 760sqm which equates to a 300sqm increase on what is proposed and was previously considered to be policy compliant. Given that the standards were updated during the course of the application, it is considered reasonable and appropriate to capture the additional requirement of 300sqm by way of a financial contribution in line with the SPD and this approach has been agreed with the GLA. As

such, the applicant will be required to make a payment of £45,300 towards improving child play space in the area.

### **Design**

152. The proposed development would comprise five new buildings, four of which would be classed as tall buildings by virtue of being in excess of 30 metres in height. The buildings would be positioned around a new public realm and improvements to Hopton Street. New pedestrian routes would be provided across the site including a new north/south routes and two new east/west routes. The new public realm provided by the development would be generous, well planted and varied in design and character. Height would be well distributed across the site, with heights generally stepping up northwards towards the river. The development would continue to form part of a masterplan with the Ludgate House development taking place on the other side of the railway viaduct.
153. The NPPF at Paragraph 56 stresses the importance of good design, considering it to be a key aspect of sustainable development. Chapter 7 of the London Plan deals with design related matters. In particular, Policy 7.1 sets out the design principles required for new development and Policy 7.6 requires architecture to make a positive contribution to the public realm, streetscape and cityscape. Policy 7.8 asserts that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.
154. The relevant Southwark design and conservation policies are Strategic Policy 12 of the Core Strategy and Saved Policies 3.12, 3.13, 3.15, 3.16, 3.17, 3.18 and 3.20 of the Southwark Plan. These policies require the highest possible standards of design for buildings and public spaces. The principles of good urban design must be taken into account in all developments including height, scale and massing, consideration of local context including historic environment, its character, and townscape strategic and local views
155. The Blackfriars Road SPD identifies this site as being a suitable location for tall buildings, a principle that is also supported by it's designation as an Opportunity Area. The SPD specifically envisages the junction of Blackfriars Road, Stamford Street and Southwark Street as being a suitable location for a cluster of tall buildings. This location at the northern end of Blackfriars Road is undergoing considerable change, as a result of a number of new developments such as No. 1 Blackfriars Road, South Bank Tower, 185 Park Street, 240 Blackfriars Road the Tate extension as well as the consented development at 18 Blackfriars Road. It is a part of the borough where the council are expecting to see continued change, together with exciting and exceptional architecture.

### Site context

156. The application site is located in the CAZ and sits adjacent to the river Thames to the east of Blackfriars Road and the Blackfriars railway viaduct, one of the most prominent locations at the northern end of Blackfriars Road and within an area that is considered suitable for tall buildings. Large scale developments have taken place immediately surrounding the site including the One Blackfriars development, 240 Blackfriars Road and South Bank Tower as well as consented developments at Wedge House, Friars Bridge Court, 18 Blackfriars and of course the extant consent that takes into account the application site alongside Ludgate House. The extant consent established the acceptability of a high density mixed use scheme with tall buildings.

### Site layout

157. The site extends from the river in the north to Southwark Street to the south and sits on

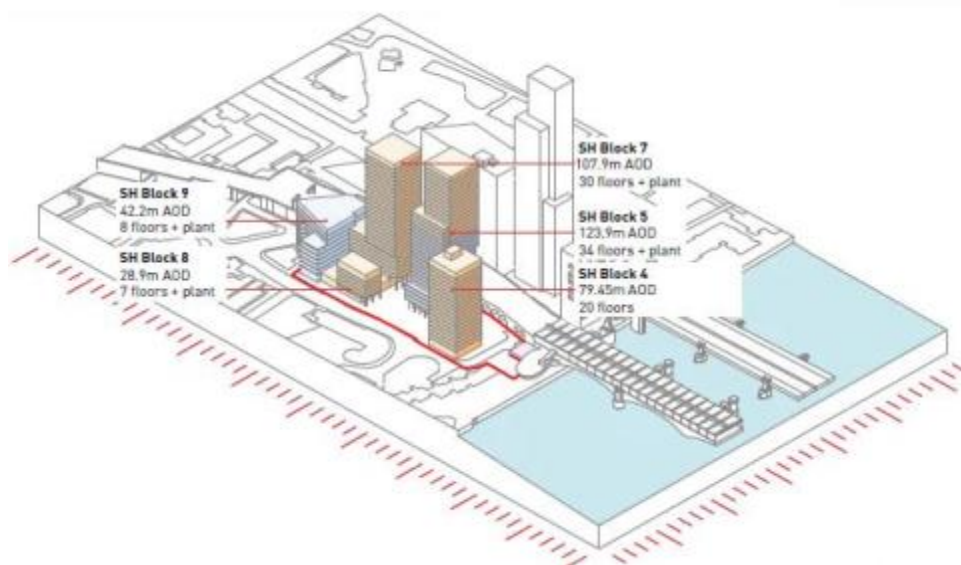
eastern side of the substantial railway viaduct which disrupts the street pattern of this part of the city and introduces a 'barrier' between Blackfriars Road and Hopton Street. Any development on this site has to start with the ambition to respect the historic context and its setting and at the same time re-connect the city blocks on either side of the viaduct with new routes and links. It should create meaningful public spaces that encourage permeability; and address streets and routes with active and engaging buildings that give this part of the city a sense of place.

158. The proposed development would comprise five buildings with large areas of public open space on Hopton Street where a small pocket park would be created and at the north west edge of the site where a new public space would provide an entry to the new cultural facility. In terms of the position of buildings and access/egress, the development broadly similar to the extant scheme with the exception that building SH-E of the extant scheme has been omitted in lieu of a larger open space fronting Hopton Street. The proposed layout is considered acceptable and would bring substantial benefits to the area including north-south and east-west connections which would improve pedestrian permeability and movement through the area. The inclusion of retail uses at ground floor will provide activation of the main public routes through the site and will enliven these spaces. The omission of building SH-E substantially increases the availability of public open space and allows Hopton Street to take on a more inviting and spacious character. The proposed layout is rational, legible and fully supported.

#### Tall buildings

159. This location at the northern end of Blackfriars Road has been considered for some time as a location of great significance and one where the council expect substantial development. The combination of factors including its siting at this northern-most bend in the river, its role in the river walk especially the proximity of Tate Modern, the important connection to the City of London across Blackfriars Bridge and the confluence of north-south and east-west arterial routes has made this a this a 'gateway' location suitable for landmark developments.

#### Image – Building heights



160. Saved Policy 3.20 sets out the five criteria that a proposal for tall buildings must meet in order to be considered acceptable. Each of these will now be taken in turn:

i. Make a positive contribution to the landscape

161. Landscape and the public realm is an important part of any proposal for tall buildings. The public realm not only creates a setting for the towers, allowing them to 'land' appropriately but also offers an opportunity for such a development to demonstrate the benefits that can flow from reaching vertically to free up more space at grade in a congested part of the city such as this.
162. This part of Southwark is characterised by busy arterial routes, an important river crossing to the City and a significant piece of transport infrastructure overlaid with important pedestrian thoroughfares. The site is located on the culturally significant Southbank and the focus of many approaches to the Tate Modern gallery to the east not just along the river, but also from Southwark Street and Stamford Street to the south.
163. The landscape proposals have been developed to reflect the significance of this site. In developing the public realm the designers have addressed the following points:

*Cultural Square*

164. The site will form an important part of the cultural offer of the city and will enhance the experience of visitors to this part of the borough. Along the Southbank, the river walk is characterised by narrow pedestrian thoroughfares that open out to broader public spaces and parks, which retain visual links to the river and give the walk its generous and varied character. This proposal addresses the river deliberately and creates a new public space to the south of the recently completed Blackfriars station. The new Cultural Square extends to the river walk and a new pedestrian link through the viaduct connects it to the plaza at the foot of the tower on the Ludgate House site.

Image – Cultural square



165. The Cultural Square is substantial in its proportions and will form the setting for the main tower of building SH-5 which is at the heart of the development. This tower offers a mix of uses including hotel and residential uses with a significant cultural venue at its basement. The public space at the foot of the tower is important in the sequence of spaces that leads on to the Tate forecourt and the Turbine Hall entrance.
166. This public space benefits from an opening directly onto the river and could transform the experience of visitors to the area. Not only does it improve access to the Tate but it also offers direct access to the station and fine views of St Pauls Cathedral across the river. It is lined with active frontages on either side and will also become a new destination with the new cultural venue which is on the southern edge of this space.
167. The character of this space will rely to a great degree on its scale and the quality of its public realm. A mix of soft and hard landscape with mature planting, high quality fixtures and features will greatly enhance this space and give it a sense of purpose. The detailed design of this space, its longer term management and even the arrangement of planned activities for this important piece of the city should be secured in the legal agreement and through relevant planning conditions.

*Hopton Street pocket park and 'Yard'*

168. Whilst the western side of the viaduct is severely constrained the new proposal for the Sampson House site introduces a new pocket park on the western edge of Hopton Street and a new 'Yard' to the south of the main tower (building SH-5). The pocket park is proposed in the place of building SH-E of the extant consent. In contrast to the Cultural

Square which is predominantly hard paved, the pocket park will create a green landscaped space at the edge of the site and a lush amenity for residents and visitors alike. The 'Yard' is located at the eastern end of the route through the viaduct from Blackfriars Road between buildings SH-5 and SH-7. It takes its character from similar yard-type spaces and is intended to form a local focus albeit one that will become an important transition space for visitors making their way from Blackfriars Road to Tate Modern.

Image – View from Hopton Street



ii) Is located at a point of landmark significance

169. The SPD concludes that the northern end of the Blackfriars Road is an appropriate location for tall buildings at the confluence of the arterial routes and the river crossing as well as the focus of many views in this location. The Public Inquiry for Nos 1 and 20 Blackfriars Road considered this in detail and found that the area at the junction of Blackfriars Road and Stamford / Southwark Street met the locational criteria stated in the policy. This was further reinforced by the consented scheme.
170. The proposed towers are centred around northern terminus of Blackfriars Road and Stamford/Southwark Street reinforces the emerging 'cluster' at this part of the borough which includes the completed developments at 240 Blackfriars Road, Southbank Tower, One Blackfriars and the consented schemes at Ludgate house and 18 Blackfriars.
171. This proposal extends the cluster to the eastern side of the viaduct as established by the extant consent. The strategic and local views demonstrate that this proposal gives the cluster a stepped three-dimensional appearance. In the views the emerging cluster steps down from the peak at the bridgehead to Tate Modern at the Millennium Bridge crossing and gives this part of the river frontage a highly articulated and undulating profile with peaks at the points of landmark significance.

iii) Is of the highest architectural standard

172. Buildings of this stature have to demonstrate their contribution to the appearance of the

wider area. The highest architectural standard is called for and requires an elegance of proportion, innovation in design and a demonstrable exceptional quality of accommodation. Whilst the principle of the towers in this location is not questioned officers have examined all aspects of the scheme and have encouraged revisions and improvements in particular to give each building its own identity and to ensure that they complement the public realm at their base and the London skyline at the top including:

*The base of the towers and their relationship to the public realm*

173. The base of each tower is a significant feature of the design. Double and treble-height spaces at the base not only give the taller elements of the group a significant presence at the ground floor but also contribute to a generous and engaging architecture at street level. The plan layouts confirm that the bases will be predominantly reception spaces for the towers and retail frontages with servicing located in the basement. This ensures that public spaces are lined with engaging active frontages.
174. The towers have been designed with a reducing floorplate at the ground floor which in some cases has resulted buildings that oversail public footways. This is not uncommon and has been used elsewhere in the borough and in this case has raised the base of buildings to two and sometimes three storeys in height resulting in residential accommodation being elevated to around the level of the viaduct and gives the public realm a generous character. All the proposed buildings have generous bases and active frontages. In some instances they are integral to the provision of public space as mentioned above with building SH-5.
175. Building SH-5 stands at a pivotal location in the development reinforcing the new public spaces at both the Cultural Square and the Hopton Street pocket park and leading pedestrians to the Tate. The building has been designed with a double-height base and a cut back at the north east corner to reinforce its role in the development.

*Amenity spaces*

176. The quality of design is defined in part by the quality of residential accommodation including the communal amenity provided. In many ways this is a vertical community and its needs should be met within the development and in the body of the tower. The inclusion of communal facilities within the tower not only gives the design an added dimension but also an architectural flourish that adds interest and delight.
177. The proposal is for a mix of ground-based and elevated gardens as well as communal rooms leading off from these gardens to give each building the required communal amenity. The residential units are generous and designed to provide adequate private amenity for residents which is bolstered by the communal spaces including the generously proportioned public space on Hopton Street and an elevated garden between buildings SH-7 and SH-8. These spaces are important in these intense urban living environments. The proposed spaces are varied, generous and well integrated into the design.

*Materiality and architectural design*

178. With a proposal like this that includes four tall buildings it is important to ensure that they do not all look the same. In this case, two architects have collaborated to give the towers their unique appearance and design. Building SH-4 has been designed by Make Architects and will feature a distinctive metallic façade and deep-inset balconies. In contrast building SH-5 has been designed by PLP (as have all remaining buildings) and is a mix of bronze cladding and pleated glass which will give it a highly articulated and tactile character. This building will also include public access at levels 15/16 where a bar/restaurant will be provided.

179. Finally building SH-7 develops the vertical aesthetic of building SH-5 but uses stone, glass and metal. In this way the three towers each have their own distinctive materiality and geometry which gives each tower its own character. The close proximity of these towers means that these are viewed as a group in the wider views. The subtle difference in the design of each building will become more apparent as one approaches and the gaps between them will distinguish them appropriately.

Image – New yard



180. Finally, the buildings on Hopton Street take on the materiality of that street. These buildings, clad in brick, reinforce the character and scale Hopton Street and mediate between the street and the towers which are set back on the Sampson House site.
181. Three of the proposed buildings will be significantly taller than their consented counterparts, with increases of between 9.6 metres and 16.6 metres. The top of any tower is an important feature of the building. This is not simply to give it a distinctive capping but also to demonstrate how it will appear in the views. Each building has been designed with its own distinctive top reflecting its distinctive character and the unique design noted above. The most prominent of the proposed buildings is SH-5. At 123m in height it will be the tallest building on the eastern edge of the viaduct. The 'pleated design and double-height order changes at the top of both SH-5 and SH-7 to become a triple-height crown which gives these buildings a fitting termination.
182. In conclusion, the proposed development is of an exceptional quality of architectural design. Each building complements its urban setting, is unique and distinctive in its design and has a well designed base middle and top. The group of buildings consolidate the emerging cluster and will turn the northern end of the Blackfriars into a gateway to the city and the borough.

iv) Relates well to its surroundings, particularly at street level

183. In terms of its contribution to the street scene every building should seek to activate all its edges. This is a highly accessible site with a river crossing and a mainline station at its heart. As such the architects have considered this site as having a 360 degree presence with active frontages on every block. The proposal achieves this aspect of the policy through a combination of high quality public realm, a mix of active uses at grade and by capitalising on and revealing existing features like the viaduct to their full potential.



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

184. The scheme has been tested in the local and wider views as well as the strategic views as set out in the London View Management Framework (2012). These accurate visual representations which comply with the requirements of the LVMF demonstrate the contribution of this proposal to the London skyline. The slender character of the tower, the gaps between the separate buildings as well as the stepped arrangement of the distinctive forms consolidates the emerging cluster and establishes the 'gateway' at this important bridgehead.
185. The site is located in the backdrop of the townscape view from St James's Park to Horse Guards Road (LVMF View 26A.1) High resolution images including AVRs of selected views from bridge demonstrate that the tallest building in the proposal at SH-5 will be not visible in this strategic view.
186. The views have been tested from the World Heritage Sites at the Palace of Westminster and the Tower of London and demonstrate that this proposal has no impact on these sensitive historic settings.

Design Review Panel

187. The earlier consented scheme was reviewed jointly by Design Council CABE and Southwark DRP in June 2012 and again by the Southwark DRP in March 2013. The Panels raised questions over: the character and quality of the public realm; and the nature of the emerging cluster. They felt the proposal offered a sound masterplan for the site but questioned its detailed design. The scheme was updated in response to these comments. At the time the Panel recognised the importance of the public realm however, the detailed design and quality of the public realm was proposed to be reserved by condition in order that it could be developed further however it should be noted that its scale and purpose was not questioned by the Panel.
188. Given the similarities between the proposed scheme and the extant scheme as well as the improvements that have been made particularly at street level, it was not considered necessary to present the scheme to the DRP.

**Heritage impacts**

189. The main designated heritage near the application site include the Grade II listed southern abutment of the Blackfriars and St Paul's Station and No. 61 Hopton Street. The listed abutment is untouched by this proposal.
190. The most significant local heritage asset is the Grade II\* listed Hopton Almshouses at 1-9 Hopton Street. These have a sensitive relationship with Hopton Street which they face onto. Buildings SH-8 and SH-9 have been designed to respond to this sensitive setting by echoing the scale of buildings on Hopton Street to reinforce this street and bring active frontages to this approach from Southwark Street. The taller buildings of SH-7 and SH-5 would be well separated from the immediate vicinity of the Almshouses by the lower rise SH-8 and the Hopton Street pocket park, ensuring that the taller buildings do not crowd their setting.

**Landscaping and trees**

191. There are no trees or landscaping on or directly adjacent to the site which would be affected. Trees and soft landscaping form an integral part of the design softening the

boundaries, delineating pedestrian routes into and across the site and providing terraces and focal points with an underlying theme of an 'urban arboretum'. The generously proportioned central plaza is bounded by green open space at Hopton Garden and accompanied by the pocket park. In order to maximise tree provision and quality, a specific tree planting strategy will be secured as part of the S106 Agreement in case those on the highway or on podiums are found not to be feasible. They could then be provided in alternative locations in the vicinity if necessary. Given the extent of the basement more detailed specifications are required so that adequate soil volumes can be engineered to sustain the sized of mature planting.

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

192. Strategic Policy 13 of the Core Strategy sets high environmental standards and requires developments to avoid amenity and environmental problems that affect how we enjoy the environment. Saved Policy 3.2 of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Furthermore, there is a requirement in Saved Policy 3.1 to ensure that development proposals will not cause material adverse effects on the environment and quality of life.
193. A development of the size and scale proposed will clearly have potential significant impacts on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site. The proposal has required an EIA in order to ascertain the likely associated environmental impacts and how these impacts can be mitigated. The accompanying Environmental Statement (ES) and Addendum deals with the substantive environmental issues. An assessment then needs to be made as to whether the residual impacts, following mitigation, would amount to such significant harm as to justify the refusal of planning permission.

#### *Overlooking*

194. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. These distances are all met in terms of the impact of the proposal on adjacent buildings. It is noted that building SH-4 comes closer to Falcon Point by virtue of enclosing the previously external balconies by pushing the façades of the building forward to the balcony face. Whilst the position of SH-4 has not changed this does take the main facades of the building slightly closer to Hopton Street and Falcon Point however the recommended minimum separation distances have been exceeded to ensure there would be no loss of privacy.

#### Daylight

195. A daylight and sunlight report has been submitted as part of the Environmental Statement. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
196. The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within an area of modern high rise buildings, a higher degree of obstruction may be unavoidable to match the height and proportion of existing buildings. This area of Blackfriars Road has been identified as an area where tall buildings are appropriate and there are existing buildings with heights of 50 storeys (One Blackfriars), 36 storeys (South Bank Tower) and 20 storeys (240 Blackfriars Road), within

close proximity to the site.

197. The BRE sets out three detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of their original value before the loss is noticeable. In terms of the ES, the level of impact on loss of VSC is quantified as follows;

Reduction in VSC	Level of impact
0-20%	Negligible
20.1-29.99%	Minor
30.1-39.99%	Moderate
40% +	Major

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

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

- Neo Bankside (Blocks A-D);
- 49 Bankside;
- 51-52 Bankside;
- 1 Blackfriars Bridge;
- 18 Blackfriars Road;
- 27 Blackfriars Road;
- 220 Blackfriars Road;
- 47 Colombo Street;
- 1-20 Hopton Gardens;
- 65 Hopton Street;
- 67 Hopton Street;
- 69 Hopton Street;
- 1-26 Friars Close;
- 1-26, 1-30, 31-42, 43-56, 57-72, 73-84 and 85-110 Falcon Point;
- 1-87 River Court;
- 1-99 Rennie Court;
- 103-109, 111, 113, 115, 130, 132 and 134 Southwark Street;
- 1 Stamford Street
- 24 Sumner Street;
- Edward Edwards' House;
- Southbank Tower;
- One Blackfriars (Residential);
- One Blackfriars (Hotel);
- Quadrant House
- Sea Containers House (Hotel); and
- Broadwell Properties.

200. The daylight report has considered a large number of windows and rooms around the site. It assessed 2,880 residential windows serving 1,567 rooms across 45 buildings for

daylight amenity. Of the 2,880 windows assessed 2,524 (88%) would satisfy the BRE recommended levels for VSC. Of the 1,567 rooms assessed, 1,539 (98%) would meet the BRE standards for NSL. The following buildings would remain unaffected by the proposed development in terms of both VSC and NSL by virtue of having less than a 205 reduction in either value:

- Neo Bankside (Blocks A-D);
- 49 Bankside;
- 51-52 Bankside;
- 27 Blackfriars Road;
- 220 Blackfriars Road;
- 47 Colombo Street;
- 7-11 Hopton Gardens;
- 73-84 Falcon Point;
- 111, 113, 115, 130 and 132 Southwark Street;
- 3-7 Stamford Street
- 24 Sumner Street;
- Southbank Tower;
- Sea Containers House (Hotel); and
- Broadwall Properties.

201. The tables below outline the general results in terms of the loss of VSC and NSL that would be experienced by the remaining buildings and a more localised assessment of the affected properties is detailed below;

Table – Impact of proposed development on VSC

Property	No. of windows tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of up to 29.9% reduction in VSC	No. with moderate adverse impact of between 30%-39.9% reduction in VSC	No. with major adverse impact of over 40% reduction in VSC
1 Blackfriars Bridge	17	15	2	0	0
18 Blackfriars Road	9	5	4	0	0
1-6 Hopton Gardens	36	28	8	0	0
12-14 Hopton Gardens	21	20	0	1	0
15-20 Hopton Gardens	41	40	1	0	0
65 Hopton Street	280	114	35	86	45
67 Hopton Street	13	8	1	4	0
69 Hopton Street	39	18	15	5	1
1-26 Friars Court	94	76	11	7	0
1-30 Falcon Point	40	26	6	1	7
31-42 Falcon Point	22	10	10	1	1
43-56 Falcon Point	28	20	2	5	1

57-72 Falcon Point	34	23	4	1	6
85-110 Falcon Point	32	31	1	0	0
1-87 River Court	283	275	6	2	0
1-99 Rennie Court	190	178	11	1	0
103-109 Southwark Street	98	97	1	0	0
134 Southwark Street	7	6	1	0	0
1 Stamford Street	51	50	1	0	0
Edward Edward's House	66	58	5	0	3
One Blackfriars Hotel	163	111	31	21	0
Quadrant House	135	134	1	0	0

Table X – Impact of proposed development on NSL

Property	No. of windows tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of up to 29.9% reduction in NSL	No. with moderate adverse impact of between 30%-39.9% reduction in NSL	No. with major adverse impact of over 40% reduction in NSL
1 Blackfriars Bridge	7	7	0	0	0
18 Blackfriars Road	3	3	0	0	0
1-6 Hopton Gardens	19	17	2	0	0
12-14 Hopton Gardens	9	9	0	0	0
15-20 Hopton Gardens	21	21	0	0	0
65 Hopton Street	180	175	5	0	0
67 Hopton Street	4	4	0	0	0
69 Hopton Street	27	21	3	2	1
1-26 Friars Court	58	56	2	0	0
1-30 Falcon Point	35	31	1	0	3
31-42 Falcon Point	18	18	0	0	0
43-56 Falcon Point	21	21	0	0	0
57-72 Falcon Point	24	24	0	0	0
85-110 Falcon Point	27	27	0	0	0

1-87 River Court	203	203	0	0	0
1-99 Rennie Court	151	151	0	0	0
103-109 Southwark Street	64	62	2	0	0
134 Southwark Street	4	3	0	1	0
1 Stamford Street	9	9	0	0	0
Edward Edward's House	20	19	1	0	0
One Blackfriars Hotel	65	60	5	0	0
Quadrant House	84	84	0	0	0

*1 Blackfriars Bridge*

202. 17 windows serving 7 rooms have been assessed at this property. 15 of the windows would achieve BRE compliant VSC with the remaining two windows experiencing reductions of less between 28.7% and 29.4% VSC which is considered to be minor in nature. In terms of NSL all seven rooms would meet the BRE criteria. Furthermore, in comparison to the consented scheme the proposed development would have no additional noticeable impacts beyond the BRE guidance and as such the impact on this building is considered acceptable.

*1-6 Hopton Gardens*

203. A total of 36 windows serving 19 rooms have been assessed for daylight at this address. Eight windows would experience a loss of VSC in excess of the 20% set out in the BRE however this loss would be between 20.1% and 24.7% VSC which is considered to be a minor impact. Furthermore, all but two of the rooms assessed for NSL would meet the BRE guidance and the two rooms that fall below the guidance would have losses of less than 29.9% and as such the impact is considered to be minor. In comparison to the consented scheme the proposed development would have no additional noticeable impacts beyond the BRE guidance and the impacts are considered acceptable.

*12-14 Hopton Gardens*

204. 21 windows serving nine rooms have been assessed at this property. In terms of VSC 20 of the windows would meet the BRE guidance and the remaining window would experience a loss of VSC of 30% which would be considered moderate adverse in nature however this affected window serves a room which benefits from three other windows that would continue to meet the BRE guidance. All rooms assessed for NSL remain fully compliant with the BRE and there would be no additional noticeable daylight impacts in comparison to the consented scheme. The impact of the development on this building is therefore considered acceptable

*15-20 Hopton Gardens*

205. All but one of the 41 windows assessed for VSC would meet the BRE guidance and the single window that would fall below the criteria does so by 20.4% which is only 0.4% below the BRE criteria and as such would be a minor impact. All 21 rooms assessed for NSL would meet the BRE criteria which is positive and there would be no additional noticeable daylight impacts in comparison to the consented scheme. The impact of the development on this building is therefore considered acceptable

*65 Hopton Street*

206. The building at 65 Hopton Street lies to the east of the application site and occupies the

northern part of Hopton Street as it turns the corner to meet the junction with Holland Street and Castle Yard. 280 windows serving 180 rooms have been assessed at this building. The VSC results demonstrate that 114 windows would meet the BRE criteria whilst 35 windows would experience a minor impact of between 20.6% and 29.8% loss of VSC. There would be a moderate adverse impact to 86 windows whereby there would be a loss of VSC of between 39.8% and 39.6% VSC. The remaining 45 windows would experience losses of VSC in excess of 40% which would be a major adverse impact.

207. Looking at the NSL assessment, 175 of the 180 rooms would meet the BRE criteria and as such would experience a negligible impact. The five remaining rooms would experience reductions of between 20 and 29.9% which would be minor adverse in nature.
208. In comparison to the consented scheme there would be 29 windows that would experience additional VSC impacts however these would all be in the range of 20% - 29.9% and as such would be minor in nature. Additionally, there would be 56 windows that would experience improved VSC levels in comparison to the consented scheme, this is a result of the omission of Building E which sat opposite 65 Hopton Street. Overall, given the fact that there is a high level of NSL compliance and that the impacts on VSC are comparable with the extant scheme including positive impacts to 56 windows, the proposed development is considered to have an acceptable impact on this building.

*67 Hopton Street*

209. Five of the 13 windows assessed for VSC would experience losses in excess of the BRE with one window experiencing a minor loss of 28.7% and the remaining four windows experiencing moderate losses of between 30.3% and 35%. In terms of NSL, all four rooms would continue to be BRE compliant. In comparison to the consented scheme there would be no noticeable additional impacts. The impact of the development on this building is therefore considered acceptable

*69 Hopton Street*

210. 39 windows serving 27 rooms have been assessed at this property. 18 windows would continue to be BRE compliant in terms of VSC. Of the remaining 18 windows 15 would experience minor losses of between 20.2% and 29.3% VSC and five windows would experience moderate losses of between 30.5% and 39.5% VSC. The remaining window would have a loss of 40.3% and whilst this is considered a major impact it is only marginally above the threshold of a moderate impact.
211. In terms of NSL 21 of the 27 rooms that have been assessed would remain BRE compliant with the six remaining rooms experiencing the following losses:
- Three rooms at 20% - 29.9% loss;
  - Two rooms at 30% - 39.9% loss; and
  - One room losing in excess of 40% NSL.
212. All of the rooms experiencing a moderate loss of both VSC and NSL are bedrooms which are considered to be less sensitive to daylight loss than principal living spaces. Whilst this property would experience losses that overall are considered to be moderate adverse in nature, it should be noted that there would be no additional impacts in comparison to the consented scheme and as such the level of impact is broadly comparable to that already consented. The impact of the development on this building is therefore considered acceptable

*1-26 Friars Close*

213. 94 windows and 58 rooms have been assessed for VSC and NSL respectively. 76 of the

94 windows would continue to be BRE compliant. Of the 18 windows that fall below the guidance, 11 would experience minor losses of between 21.6% - 29.6% and the remaining seven would experience losses of between 30% and 37.9% which is considered to be moderate in terms of impact.

214. For NSL, only two of the 58 rooms that have been assessed would fall below the BRE criteria and both of these rooms would experience reductions of less than 29.9% which is considered to indicate a minor impact. In comparison to the consented scheme only one window would experience an additional impact and this would be minor in nature at 22.2% VSC reduction. However, 34 windows would see improved VSC in comparison to the consented scheme. Overall, the impact of the proposed development on this building is considered to be acceptable with VSC and NSL reductions largely minor in nature and in many cases improving in comparison to the consented scheme. The impact of the development on this building is therefore considered acceptable

#### *1-30 Falcon Point*

215. Of the 40 windows assessed for VSC, 26 would continue to meet the guidelines whilst 14 would fall below the BRE standard as set out below:
- Six windows at 20% - 29.9%;
  - One window at 30% - 39.9%; and
  - Seven windows with more than 40% reduction
216. In terms of NSL, 31 of the 35 rooms that have been assessed would remain compliant with the BRE and the four affected rooms would have moderate to major adverse impacts with three rooms experiencing at least a 40% reduction.
217. The range of losses for VSC as set out above are in line with the extant scheme. When comparing the impact of the proposed scheme against the consented scheme only one additional window at 1-30 Falcon point would experience a noticeable reduction which would be 23.6% VSC, whereas 14 windows would experience some improvements to their overall VSC. The impact on this building is therefore considered to be acceptable and in line with the impacts of the extant scheme.

#### *31-42 Falcon Point*

218. 22 windows and 17 rooms have been assessed for VSC and NSL respectively. 10 windows would remain compliant with the BRE in terms of VSC whilst 10 windows would experience minor reductions of between 20.3% and 29.9% VSC. One window would have a reduction of 38.2% which is considered a moderate impact and one would have a reduction of 60% which is considered to be a major impact.
219. In comparison to the consented scheme the window experiencing a 60% reduction in VSC would only see a real terms loss of VSC of 0.7% in comparison to the consented scheme. As such the proposed VSC impacts are consistent with the extant scheme as no windows would experience any noticeable additional loss of VSC. Additionally, all 18 rooms assessed for NSL would remain compliant with the BRE. The overall impact on this property is considered acceptable due to the high level of NSL compliance and comparable impacts to the extant scheme.

#### *43-56 Falcon Point*

220. An assessment has taken place to 28 windows and 18 rooms. 20 windows would remain BRE compliant with two windows experiencing minor losses of between 23.4% - 24.1% VSC, five windows with moderate losses of between 35.6% a- 36.8% VSC and one window with a loss of 40% VSC which would be categorised as major. All of the VSC losses are in line with those experienced as part of the consented scheme and no



additional noticeable VSC impacts compared to the extant scheme would be experienced. Additionally, all 21 rooms would continue to have BRE compliant NSL which is positive. Overall, the impacts to this building are consistent with the extant scheme and are considered acceptable.

*57-72 Falcon Point*

221. An assessment has taken place to 34 windows and 24 rooms. 23 windows would remain BRE compliant with four windows experiencing minor losses of between 21% - 22.4% VSC, one window with moderate losses of 30.5% VSC and six windows with losses of between 49.5% VSC and 100% VSC which would be categorised as major. All of the VSC losses are in line with those experienced as part of the consented scheme. Those properties with major losses of VSC had very low VSC levels to begin with which results in a disproportionate percentage change. Whilst there would be five windows experiencing a loss of VSC beyond that of the consented scheme, these are windows which had low VSC values to begin with and as such the percentage change in VSC is disproportionate to the actual real terms loss of VSC which in many cases is less than 1% VSC. Additionally, all 24 rooms would continue to have BRE compliant NSL which is positive. Overall, the impacts to this building are consistent with the extant scheme and are considered acceptable.

*85-110 Falcon Point*

222. 32 windows serving 27 rooms have been assessed for VSC and NSL respectively. All but one window would continue to meet the BRE with the affected window having a minor reduction of 26.6% VSC and would continue to be served by unaffected windows. All 27 rooms would continue to be BRE compliant in terms of NSL. Additionally there would be no further impacts to those identified as part of the extant scheme and as such the impact on this building is considered acceptable.

*1-87 River Court*

223. In terms of VSC 283 windows have been considered of which eight would experience reductions beyond the BRE guidance however all of these rooms would continue to be served by other windows that would remain BRE compliant. All 203 rooms assessed for NSL would remain compliant with the BRE. No additional impacts to those identified as part of the extant scheme would be experienced. Overall the impacts to this building are considered acceptable.

*1-99 Rennie Court*

224. Of the 190 windows assessed for VSC, 178 would remain BRE compliant. Of the 12 windows that would have noticeable impacts 11 would have minor losses of between 20% and 29% VSC with the remaining window having a moderate impact with a 30% VSC reduction which is only marginally above the minor criteria and this window has an already low level of VSC and a real terms change of just 0.3%. All 151 rooms assessed for NSL would remain compliant. In comparison to the consented scheme the loss of VSC would not be noticeable and would be considered negligible. The impact on this building is considered to be acceptable and in line with the impacts identified on the extant scheme.

*103-109 Southwark Street*

225. All but one of the 98 windows assessed for VSC at this property would remain BRE compliant and the window that would experience a loss has a low existing VSC level of 1.1% and would see a reduction to 0.8%. This represents a real terms loss of VSC of just 0.3% and as such the percentage change of 27.3% is disproportionate to the actual loss. 62 of the 64 rooms assessed for NSL would remain compliant with the remaining two rooms experiencing minor reductions of less than 29.9%. The proposed development would have no significant impact on this building.

*134 Southwark Street*

226. 7 windows were assessed for VSC and only one would experience a noticeable reduction in daylight with a VSC reduction of 23.8% which is minor in nature. In terms of NSL, three of the four rooms would remain BRE compliant with one room experiencing a moderate loss of 34.3% which is moderate in nature but in line with the extant consent. Overall the impact on this building would be minor.

*1 Stamford Street*

227. 51 windows have been assessed and only one would experience a loss of VSC beyond the BRE however this window serves a room that benefits from other unaffected windows and as such there would be limited impact. All nine rooms assessed for NSL would remain fully compliant with the BRE. There would be no impacts further to those identified in the extant consent and the impact on this building is considered acceptable.

*Edward Edwards House*

228. 66 windows serving 20 rooms have been assessed for VSC and 58 would remain compliant. The remaining eight windows would have minor impacts (five windows) and major impacts (three windows) however all of these windows have low existing levels of VSC and the absolute VSC losses would be between 0.1% and 0.7% which would not be noticeable. In terms of NSL only one of the 20 rooms would experience a loss beyond the BRE guidance however this reduction would be minor in nature and would be in line with the consented scheme. Overall, in comparison to the consented scheme there would be no additional noticeable impacts. The impact of the development on this building is therefore considered to be acceptable.

*Quadrant House*

229. At Quadrant House all 84 rooms assessed for NSL would remain compliant and of the 135 windows assessed for VSC only one would experience a noticeable impact with a loss of 20.3% VSC which is considered minor. Furthermore, there would be no additional noticeable impacts in comparison to the extant scheme and as such the overall impact on this property is considered to be acceptable.

*One Blackfriars*

230. As the building at One Blackfriars was not occupied at the time of completion of the Environmental Statement, the impact of the proposed scheme on daylight to this building has been assessed using Average Daylight Factor and No Sky Line. 863 rooms have been assessed for both ADF and NSL with compliance rates of 95% (815 rooms compliant with the BRE) and 99.5% (859 BRE compliant rooms) respectively. As such, the impact of the proposed development on this building is considered negligible.

*Conclusions on daylight*

231. The results of the daylight assessment demonstrate that there would be a number of windows and rooms that would not meet the relevant daylighting standards of the BRE, with those flats towards the east of the site particularly affected (Falcon Point and 65 Hopton Street). However, the daylight impacts are directly comparable to the consented scheme and it has been demonstrated that there would be very limited additional impacts compared to those already identified under the extant implemented consent and there are instances where daylight levels would improve in comparison. Additionally, the layout of the proposed scheme provides for gaps between the buildings, which would allow flats to obtain views and glimpses through the site. The site layout would also allow for these flats to obtain views of the open spaces within the development, such as the central square and Hopton Gardens, and therefore this is considered to represent an improvement over the existing situation. Consideration should also be given to the fact that the BRE should be applied flexibly as the site is in an Opportunity Area within a

Central London location and accordingly the standards should be applied with some degree of flexibility. Overall, the impact of the proposed development in terms of daylight is considered to be acceptable.

### Sunlight

232. All of the windows within 90 degrees of due south have been assessed with regards to impact on sunlight. The BRE guide states that if a window can receive 25% of summer sunlight, including at least 5% of winter sunlight between the period of 21 September and 21 March, then the room would be adequately sunlight.
233. In terms of sunlight, 1,301 windows at 37 properties have been assessed with 1,246 of the assessed windows continuing to meet the BRE guidance which is a 96% compliance rate. Of the 37 properties that have been assessed, only nine would see changes beyond the BRE guidelines and these are set out in the table below:

Address	Total No. of Windows	BRE Compliance	Windows which do not meet BRE Criteria					
			Below threshold for total APSH			Below threshold for Winter PSH		
			20-29.9% loss	30-39.9% loss	40% + loss	20-29.9% loss	30-39.9% loss	40% + loss
1 Blackfriars Bridge	11	10	0	1	0	0	0	1
65 Hopton Street	217	204	3	4	6	1	1	2
1-30 Falcon Point	40	37	0	0	3	0	0	1
31-42 Falcon Point	22	15	0	3	4	3	2	0
43-56 Falcon Point	28	27	0	1	0	1	0	0
57-72 Falcon Point	34	31	1	1	1	0	0	3
85-110 Falcon Point	32	31	1	0	0	0	0	0
1-87 River Court	168	154	7	4	0	0	5	9
One Blackfriars Hotel	72	60	11	1	0	0	0	0
<b>Total</b>	<b>624</b>	<b>569</b>	<b>23</b>	<b>15</b>	<b>14</b>	<b>5</b>	<b>8</b>	<b>16</b>

234. In comparison to the consented scheme, only one property, 65 Hopton Street, would see changes beyond those established and accepted in the extant scheme. When comparing the impact of the proposed development on 65 Hopton Street to that of the consented scheme, 214 of the 217 windows that have been assessed would see no noticeable

change, the remaining three windows would see a more noticeable change as set out below:

- W5/668 which falls within R2/668 (bedroom) the room is dual aspect with 3 additional north facing windows.
- W6/668 which falls within R3/668 (kitchen)
- W3/670 which falls within R3/670 (unknown use)

235. All three windows retain the same levels of winter PSH as in the extant scheme. For APSH windows W5/668 and W6/668 each experience an alteration of 20.7% which is considered Minor Adverse. W3/670 experiences an alteration of 33.3% which is considered Moderate Adverse. In the context of the proposed development, the central London and highly urbanised location and the impacts established as part of the consented scheme, the proposed APSH outcomes are considered acceptable.

#### Overshadowing

236. An overshadowing assessment has been undertaken for the amenity spaces of the following properties:

- Falcon Point (north and south)
- Tate Modern (north and south)
- Neo Bankside
- 65 Hopton Street
- 67 Hopton Street
- One Blackfriars

237. Of all the spaces that have been assessed, only the spaces at 65 Hopton Street would see any changes that would be considered moderate or major in terms of the level of impact. The remaining properties/spaces would see negligible impacts with the exception of Falcon Point north which would see a minor beneficial improvement in the area of land that would see at least two hours of sun in winter.

238. At 65 Hopton Street, nine amenity spaces have been assessed for overshadowing. Five of these spaces would see only very minor changes and would continue to receive good levels of sun in line with the BRE guidance. The remaining four areas would see more substantial changes and include the north facing terraces on levels seven to ten.

239. Full compliance with the BRE is already a substantial challenge for these spaces given their northern orientation. The level of sunlight loss for these spaces varies from 81% to 100% loss of direct sun. However, it should be noted that the current levels of direct sun are already very low in many instances, again by virtue of the northern orientation of the building and the impacts of self shadowing.

240. The impacts of the proposed scheme have therefore been compared against the impacts established by the consented scheme and the loss of direct sun is comparable and in line with the impacts of the extant scheme.

#### Solar glare

241. Solar glare can occur as a result of solar reflections which occur at angles of less than 30 degrees of a driver's line of sight. 32 sensitive locations were identified however 20 of these are considered to have a negligible effect either as a result of the buildings not being visible from the junctions or because the portion of the development visible together with the angle of sight from the driver's line of sight is too small to result in any impact. Of the remaining 12 viewpoints, eight are considered to have minor adverse impacts. The

minor adverse significance is due to mitigating factors such as reflections occurring from a small section of façade, potential reflections occurring over a short period of time, unaffected traffic signals and the ability to deploy a cars visor. These viewpoints are as follows:

- Stamford Street (eastbound)
- Blackfriars Bridge (two viewpoints both southbound)
- Trainline south (two viewpoints both northbound)
- Trainline north (southbound)
- Trainline east (two viewpoints both westbound).

242. The remaining four junctions have further impacts and will be discussed further:

#### Stamford Street W4

243. On Stamford Street, two viewpoints have been considered (W4A and W4B – eastbound) and the impacts on these viewpoints are categorised as moderate adverse and minor adverse respectively. Given that the facades of the proposed buildings are well articulated/broken up, it is considered that instances of solar glare at these junctions would be brief. Furthermore, the presence of two traffic signals, both of which are fitted with visors, would mitigate the overall impact to minor adverse. It should be noted that once the approved buildings at Ludgate House are completed, the impact of solar glare on these Stamford Street junctions would be reduced to negligible. The Ludgate House development is currently under construction and as such is likely to be finished prior to the Sampson House development.

#### Stamford Street W5

244. Four viewpoints have been considered at this location. The ES notes that there would be some impacts at different points in the year and these could be categorised as major adverse. However, these impacts can be mitigated by the use of the visor, the fact that the solar reflections are scattered and brief in nature and the fact that the traffic signals at this junction are all fitted with visors. Again, it should be noted that the solar reflection from this viewpoint would only occur if the consented development at Ludgate House is not constructed as the completed development at Ludgate House would block the sections of façade at Sampson House that may cause reflections at this junction. Given that the Ludgate House development is currently under construction it is considered that impacts at this junction would be well mitigated.

#### Southwark Street E4

245. Four viewpoints have been considered at this location. At two of the viewpoints the impact is considered to be negligible due to the reflections occurring more than 25 degrees from the driver's line of sight. The remaining viewpoints would experience some reflection which has been categorised as moderate adverse. This impact would be mitigated by the articulation of the façade design, brief nature of the instances of reflection and the fact that most of the reflections would occur above the drivers visor cut off.

#### Southwark Street E5

246. Two viewpoints have been considered at this location however the impact would be categorised as minor adverse owing to the distance of potential solar glare from the drivers' line of sight, reflections occurring above the driver's visor cut off line and the presence of two traffic signals.

### **Noise and vibration**

247. Noise and vibration impacts have been considered as part of the ES which considers the

key considerations to be:

- Effects from construction works;
- Effects from construction traffic;
- Effects from the completed development in terms of vehicle movements and plant noise; and
- Site suitability for the proposed used.

248. During the construction phase the majority of noise effects, with mitigation in place, would be considered negligible adverse for most receptors albeit that that two buildings adjacent to the development site would experience minor adverse impacts. These impacts would be short term and temporary. Similarly there would be negligible and minor adverse vibration impacts at Hopton Gardens and Falcon Point respectively however these would also be short term and temporary.
249. Once the development has been completed then noise from traffic and noise from plant would be categorised as Negligible adverse and moderate adverse respectively. However, with appropriate mitigation in place these effects would be reduced to negligible adverse. In terms of cumulative impacts the development would not lead to any significant adverse effects.

### **Energy and sustainability**

250. The London Plan Policy 5.2 sets out that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy Be lean: use less energy; Be clean: supply energy efficiently; Be green: use renewable energy. This policy requires development to have a carbon dioxide improvement of 35% beyond Building Regulations Part L 2013 as specified in Mayor's Sustainable Design and Construction SPG.
251. Policy 5.3 states that developments should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process. LP5.7 Within the framework of the energy hierarchy major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
252. Strategic Policy 13 of Core Strategy states that development will help us live and work in a way that respects the limits of the planet's natural resources, reduces pollution and damage to the environment and helps us adapt to climate change. The applicants have submitted an energy strategy and a sustainability assessment for the proposed development which seek to demonstrate compliance with the above policy.

#### *Be Lean*

253. The measures proposed include:
- Building envelope will act as an important climatic modifier, with a well-designed façade significantly reducing the building's energy demand and U-Values that exceed the minimum standards;
  - Façade optimisation of the glazing for balancing cooling loads against daylighting to ensure good daylight without unwanted solar gain and heat loss;
  - The building form and massing will provide passive control of solar gains to ensure that solar gains are maximised in winter months and minimised in summer;
  - Low water consumption;
  - The energy required to heat or cool the incoming fresh air supply to the buildings will be significantly reduced by using an efficient heat recovery system;

- Low energy lighting; and
- Automatic lighting control.

#### *Be Clean*

254. The measures proposed include the provision of a Combined Heat and Power scheme.

#### *Be Green*

255. The measures proposed include the provision of photovoltaic panels.

256. Taken together, the Be Lean, Be Clean and Be Green measures would achieve a total carbon reduction of 35.8% over the 2013 building regulations. This is further broken down to a 38% reduction for the residential part of the development and a 35.2% reduction for the non-residential part of the scheme.

257. This is fully compliant with current policy and the requirement to provide a 35% reduction in carbon dioxide emissions over the 2013 Building regulations. Current London Plan policy requires the residential aspect of major developments to achieve carbon zero. It is not considered that there are further options available to making additional CO2 savings for the residential aspect of the scheme and as such it considered appropriate to off-set this shortfall with a financial contribution to the Carbon Off-set fund. This would include a payment of £493,274 in order to make the residential element of the development 'Carbon Zero'. A condition will be imposed to secure BREEAM excellent rating on the non-residential aspect of the development.

#### **Ecology and biodiversity**

258. Ecology has been scoped out of the EIA, based on a Preliminary Ecological Appraisal (PEA) which identified no significant impacts upon ecological receptors. All identified impacts within the PEA will be addressed through a Construction Environmental Management Plan (CEMP) which would be a conditioned requirement of any consent issued and is supported by the council's Ecologist who considers that the proposed development offers an opportunity to enhance biodiversity and ecology on the site through the landscaping of the open spaces and the introduction of bird and bat boxes.

#### **Air quality**

259. Air quality impacts have been assessed as part of the ES. This includes:

- Impacts on air quality arising from the construction project;
- Impacts from the completed and operational development; and
- Suitability of the site for the proposed uses.

260. The impact of the demolition of Sampson House has not been considered by the ES. This is a result of the demolition taking place under the extant consent and the fact that the impact of demolition on air quality was considered under the original ES and mitigated by condition.

261. During the construction phase it is recognised that there would be impacts such as dust in the air as well as dust and dirt on the highway as a result of construction vehicle movements. This can be suitably managed and mitigated through a Construction Environmental Management Plan which would be a conditioned requirement of any consent issued. The impact of construction vehicle traffic emissions is not considered to be significant.

262. In terms of the completed and operational development, the predicted annual mean concentrations of NO2 and particulate matter have taken into account emissions generated by road traffic and energy plant with the result being that no significant air quality effects have been identified at any of the existing surrounding receptors subject to

ensuring the energy plant installed on site will be efficient.

263. Given that the air quality for future residents and users of the proposed development would be acceptable, the site is considered to be suitable for the range of uses being proposed.

#### **Ground conditions and contamination**

264. Any permission issued would be subject to appropriate conditions to test for, investigate and remediate any land contamination. Furthermore, the construction project would be bound by the terms of a Construction Environmental Management Plan which will be secured as part of the S106 Agreement.

#### **Water resources and flood risk**

265. The water resources subject area has been scoped out of the EIA and the applicant has submitted a Flood Risk Assessment (FRA) and a Drainage Strategy in support of the application. The site is located within Flood Zone 3 which is considered to be an area of high risk of flooding due to the proximity of the tidal River Thames. However the site is protected by the Thames Barrier and related defences. The Environment Agency were consulted on the application and whilst they initially objected in order for further testing to be undertaken they have subsequently lifted their objection as the more vulnerable uses of the development (such as new homes) would be located at least 2.79m above the maximum Likely Water Level should there be a breach in the River Thames flood defences and this takes climate change into account. It is considered prudent to re-impose the environmental conditions that were attached to the extant consent.

#### **Archaeology**

266. Samson House is located within the 'Borough, Bermondsey and Rivers' Archaeological Priority Zone (APZ). The applicants have submitted a desk-based assessment 'Bankside Yards East 64 Hopton Street London SE1 9JH Historic Environment Assessment' by Museum of London Archaeology (MoLA) and dated January 2018 in support of this application.
267. Sampson House is assumed to include the site of the Swan Theatre. This Tudor theatre is shown on Aldwell's map of 1627 covering Paris Gardens Manor. This locates the theatre to the west of Green Walk (future Hopton Street), south of Upper Ground and south of the link to the Paris Garden's manor house. From examining later maps this link to the manor house remains as a continuation of Holland Street until the construction of Sampson House over this link. Aldwell's map, whilst schematic in its representation of buildings, is similar in the layout of streets with other later maps, for example: the location of Paris Garden Stairs is to the north of Green Walk, therefore the location can be considered to be relatively secure for the theatre.
268. Sampson House has two levels of basement that cumulatively, together with foundations, will have severely impacted upon buried archaeological remains on site. Levels of the upper basement are included in the desk-based assessment and these are shown to be set well below OS datum. The second, lower basement level reduces potential in this part of the site to an entire storey further below. There is very little chance of any archaeological survival in the basemented areas of Sampson House.
269. The assessment shows that approximately 10% of the site, to the north, has the potential to contain important prehistoric, Roman, later medieval and post-medieval remains in the areas of the site outside the footprint of the existing basement to the north, which includes the external, undeveloped area of Hopton Street and the area of the car park to the north of Hopton Street. MoLA calculates these areas, as combined, to constitute approximately 10% of the site.



270. Given the site's potential to contain archaeological remains in one small area of the site and, in light of the small and localised area of proposed impact, no further archaeological fieldwork is required pre-determination of this planning application, but archaeological interest should be managed for the areas of the site not impacted by previous development. This would be secured by attaching the relevant conditions to any grant of planning permission.

#### **Wind microclimate**

271. Wind microclimate has been considered as part of the ES taking into account pedestrian comfort and safety during construction and once the development has been completed and is operational. The ES notes that once the development is completed the wind conditions at ground level thoroughfares and at building entrances will be appropriate to their use with no adverse impacts.
272. In terms of the amenity spaces and some of the amenity terraces, there are instances where wind conditions are windier than desired and as such could have a minor to moderate adverse impact. As such, mitigation would be required in these locations and this would be secured by way of a planning condition. The types of mitigation proposed include low level planting, tree planting, increased balustrade height and screens. The mitigation would be key to sheltering the amenity spaces from the winds and accordingly it is recommended that these details be secured by condition.

#### **Aviation**

273. The impact of the development on aviation was scoped out of the ES as it was fully considered by the extant consent which included the taller buildings on the Ludgate House site. Nevertheless the National Air Traffic Safeguarding office (NATS) has been consulted on the proposed development and have confirmed that the proposal does not conflict with their safeguarding criteria and as such there are no objections to the development from a safeguarding perspective.

#### **Television and radio signals**

274. Interference to telecommunications systems has been scoped out of the EIA, based on the findings of an electronic interference assessment which was included in the 2012 ES for the extant scheme. No significant effects are considered to be likely for radio, cable and terrestrial TV, and mobile phone signal. The Scoping Report submitted under application 18/AP/0436 notes that there is potential for, at worst, minor adverse effects on satellite TV signals, however with the incorporation of mitigation measures the effects are reversible and the residual impacts would be of negligible significance.

#### **Socio-economic impacts**

275. Taking into account the loss of the existing office floorspace in Sampson House it is considered that the development would create up to 743 full time jobs and would provide an additional 341 new homes. The provision of these new jobs and homes is considered to be a moderate beneficial impact of the development to the local area.
276. The new homes would lead to an uplift in the local population with increased demand for local schools and healthcare. There is appropriate capacity within the local primary and secondary schools to accommodate the uplift in residents and as such the impact would be negligible. The ES notes that the uplift in population could result in a minor adverse impact on health care provision with the requirement for 0.3 additional GP's. However, taking into account the fact that the developer would be required to pay the Southwark Community Infrastructure Levy (SCIL) which is invested in social infrastructure, including health provision, the residual impacts on health care provision would be negligible.

277. The ES notes that collectively the new residents, hotel guests, employees and visitors to the area would have a moderate beneficial impact at local level in terms of increased local spending.

## **Transport**

### *Introduction*

278. In transport terms the proposed development is broadly similar to the consented scheme with underground parking and servicing accessed from both Southwark Street and Hopton Street. The development would provide car parking for 70 cars (residential) and this has been reduced from the 105 residential car parking spaces that were approved on the consented scheme. As part of the redevelopment it is proposed that Hopton Street would become one-way. Cycle hire facilities would be improved and pedestrian connectivity through the site would be enhanced. Public transport accessibility at this site is of the highest level.
279. The NPPF states that planning decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (para. 34).
280. Core Strategy Strategic Policy 2 encourages walking, cycling and the use of public transport rather than travel by car. Saved Policy 5.1 of the Southwark Plan states that major developments generating a significant number of trips should be located near transport nodes. Saved Policy 5.2 advises that planning permission will be granted for development unless there is an adverse impact on transport networks; and/or adequate provision has not been made for servicing, circulation and access; and /or consideration has not been given to impacts of the development on the bus priority network and the Transport for London (TfL) road network.

### *Site context*

281. The site has the highest level of public transport accessibility with a PTAL level of 6b, rated on a scale of 1-6 where 1 represents low accessibility and 6 the highest accessibility. There are several railway and London Underground stations located within the vicinity of the site. Blackfriars and Southwark. Waterloo and London Bridge stations are all relatively close by around 20 minutes walk. The site is well connected to the London bus network, cycle routes and walking routes.

### *Site layout*

282. The proposed site layout would improve pedestrian routes in the area, in particular providing linkages to the two new east-west routes established by the extant consent and a north-south route through the development between Southwark Street and the River Walk. Vehicle access and egress within the site remains largely as consented under the extant scheme with a new entrance from Southwark Street which would be the main vehicle access into the site. This would ensure that most servicing and refuse vehicles would be confined to the strategic road network. A further access point is available on Hopton Street for residents with the access providing a direct point of entry to the car lifts which service the basement car park. The vehicle entrance to the car park is set back well into the site to enable vehicles accessing it and waiting at the gate to stay clear of the adjoining highway. A vehicle swept path analysis has been completed which confirms that the parking/servicing areas of this site would have ample vehicle manoeuvring space that would enable cars and servicing vehicles to access and exit the site in a forward gear.

### *Car parking*

283. Saved Policy 5.6 (Car Parking) of the Southwark Plan and Core Strategy Policy 2 (Sustainable Transport) state that residential developments should be car free. For office

use, a maximum of one space per 1500sqm is permitted which would equate to a maximum of six spaces. No parking (except disabled provision) is permitted for retail or culture uses.

284. The consented scheme (on the Sampson side) included 107 car parking spaces which equated to a parking ratio of 0.47 of the residential units. As submitted, the application continued to propose 107 spaces (105 of which would be residential parking) and due to the uplift in the number of dwellings this reduced the parking ratio to 0.31.
285. Despite the previous level of car parking being accepted as part of the consented scheme, officers raised concerns with the applicant about the overall quantum of parking following comments from both the GLA and TfL. As a result of this the applicant has removed 35 of the originally proposed 105 residential spaces car parking spaces to give an overall parking provision of 70 residential spaces and a ratio of 0.25 of the residential flats.
286. The reduction in car parking is welcomed, particularly given the application site's location within the CAZ and an area with the highest level of public transport availability. The reduced level of parking will encourage more people living within the development to walk, cycle or take public transport and such accords with the council's sustainable transport aspirations. Given the weight which can be attached to the implemented consent, the level of car parking could be justified. The proposed car parking spaces will need to be fitted with electric vehicle charging points and spaces will be allocated and reserved for disabled users. Two car club bays are being provided on street and this will encourage car sharing.

*Car parking bond*

287. On the previous permission, the developer was required to pay £261,000 as a car parking bond. The bond is intended to monitor car use, and to incentivise the developer to encourage residents to use non-car modes for more trips. This mitigation in the form of a bond would be secured as part of the proposed development, with penalties deducted should the number of trips exceed those set out in the transport assessment. The development would need to incorporate sufficient infrastructure to allow the monitoring of vehicle movements. This would continue to be secured as part of the S106 Agreement.

*Cycle parking*

288. The site is well served by designated cycle routes, Blackfriars Road and Southwark Street are part of the National Cycle Network and connect to Westminster Bridge to the west to the Cycle Super Highway on Southwark Bridge to the east.

Image – Pedestrian and cycle routes through the site



289. The development would incorporate 686 long stay and 52 short stay cycle parking spaces on basement level 2 of this development which leads to an overall provision of 738 spaces. The quantum of cycle parking is fully compliant with the London Plan. TfL have requested that an additional 60 long stay and 50 short stay spaces be provided in order to bring the development in line with the policies set out in the draft London Plan. The draft London Plan is not yet adopted and has limited weight and the proposal is fully compliant with the current London Plan, Nevertheless, provisions will be made within the S106 Agreement to investigate the provision of additional cycle parking. An east-west cycle route, approved as part of the consented scheme and subsequent conditions, will be maintained as part of this development and will connect the site through the railway arches to upper ground on the west side of Blackfriars Road. Cyclists will need to dismount and use a short ramp to bridge the change in levels between the Sampson House side of the viaduct and the higher Ludgate House side.

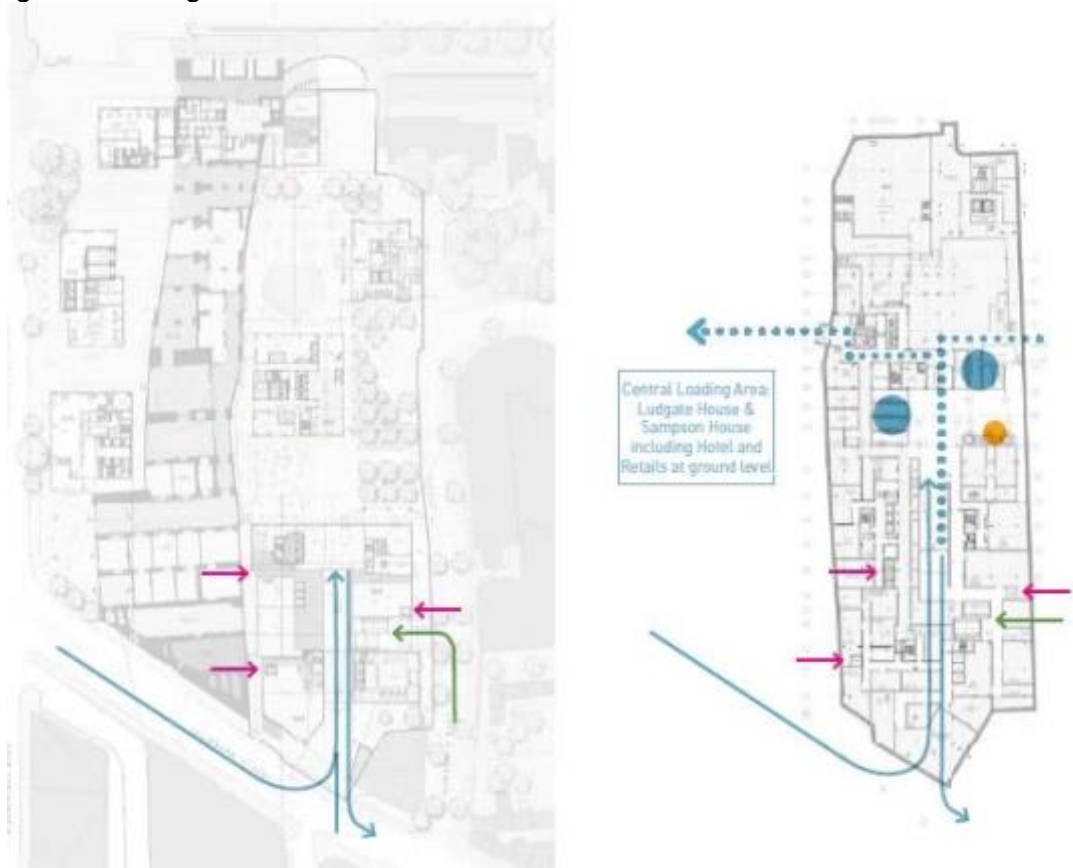
#### *Cycle hire*

290. There is an existing cycle hire docking station on Southwark Street. As part of the proposed development, TfL have requested a financial contribution of £87,000 towards cycle hire expansion. This would equate to an additional 15 docking points and will be secured as part of the S106 Agreement.

#### *Forecast vehicle movements*

291. The proposed development would be serviced on-site and would minimise its impact on surrounding streets. In terms of vehicle movements the applicant's consultants have estimated that it would generate 11 and nine two way vehicle movements in the morning and evening peak hours respectively. Southwark's Transport Officer's own interrogation of comparable sites' travel surveys within the TRICS travel database suggests that the residential element of this development would generate 12 and seven two way vehicle movements in the morning and evening peak hours respectively while the hotel would produce 13 and 10 two way vehicle movements in the morning and evening peak hours, individually.

Image – Servicing and access



292. It is also projected that the increase in the retail part of this development compared to the previous scheme would generate 17 and 29 two-way vehicle movements in the morning and evening peak hours respectively while the smaller office would create reductions of 33 and 29 two way vehicle movements in the morning and evening peak hours respectively.
293. In the view of the council officers, the proposed development proposal would therefore produce a net increase of nine and 17 two way vehicle movements in the morning and evening peak hours respectively. Whilst the Transport Officer's net forecasted supplementary two way vehicle movements for the evening peak hour is significantly higher than the nine predicted by the applicant's consultants, both morning peak projections are comparable. As such, the council's Transport Team are satisfied that the development would not have any noticeable adverse impact on the prevailing vehicle movements on the adjoining roads.

#### *Servicing*

294. The servicing is contained on site accessed from a new point on Southwark Street. The applicant has estimated 24 two-way service vehicle trips in the morning peak servicing hour of 10am, 80% of which would be light vans. The two-way service vehicle trips for the remaining parts of the day would generally be less than 15, an increase of 50% over an assumed level associated with Sampson House. It is considered that this can be accommodated in the available service space without an additional harmful impact on the highway.
295. Additionally, the applicant has proposed various travel plan initiatives encompassing

provision of a travel pack with local public transport information, two car club spaces, delivery lockers and shower/changing/locking facilities for cyclists plus monitoring.

#### Conclusions on transport

296. The proposed site layout including the vehicular access points, position of buildings in relation to highways and the new pedestrian/cycle routes are all welcomed. The proposed development builds on the positive aspects of the approved scheme in terms of improving legibility and connectivity.
297. The applicant has significantly reduced the level of on site car parking which is positive and through providing London Plan compliant levels of cycle parking alongside an extended cycle hire facility, the proposed development will make suitable provision for sustainable forms of transport.
298. The provision of on site servicing will minimise impacts on the transport network and the S106 Agreement will secure details of a Construction Management and Logistics Plan; Service Management Plan; Car Parking Bond; and Travel Plan monitoring.

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

299. Saved Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 of the Southwark Plan is reinforced by the recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic Policy 14 'Implementation and delivery' of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:
- necessary to make the development acceptable in planning terms;
  - directly related to the development; and
  - fairly and reasonably related in scale and kind to the development
300. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

Planning Obligation	Mitigation	Applicant Position
Affordable housing in lieu payment	£38,500,000 Early and late stage viability reviews.	Agreed
Archaeology	£11,171	Agreed
Car Club	Provision of two car club bays and three years membership for all eligible residents.	Agreed
Carbon Offset – Green Fund	£493,374	Agreed
Child Play Space	£45,300	Agreed
Cycle Hire	Three years membership for all eligible residents.	Agreed
Employment During Construction	Provide 173 jobs, 173 short courses and 43 construction industry apprentices for Southwark residents or make a payment of £834,350.	Agreed
Employment in the Development	Provide 130 sustained jobs for unemployed Southwark residents or make a payment of £559,000.	Agreed
Parking bond	£261,000	Agreed
Public realm improvements	£150,000 towards improvements to Falcon Point Piazza and £150,000 towards improvements to the approach to the Tate Modern.	Agreed
Transport for London	Cycle hire docking station - £87,000. Legible London –£50,000	Agreed
Transport (site specific)	£200,000 towards bus shelters and countdown facilities; £270,000 towards bus service improvements; £18,000 towards road resurfacing; and £60,000 towards three raised tables on Hopton Street	Agreed
Trees	Not specifically required unless unforeseen issues prevent trees from being planted or they die within five years of completion of the development in which case a contribution will be sought - £5,000 per tree.	Agreed

### *S106 Provisions*

301. The legal agreement will also secure an Admin Fee at 2%; Estate Management Plan; Construction Environmental Management Plan; Construction Logistics Plan; Site Wide Energy Strategy; Service Management Plan; Parking Management Plan; Details of Car Club Bay and Marketing; Accessible Homes Marketing; Hotel/Taxi Management Plan; Landscaping Strategy; and Parking Permit Exemption.
302. The Legal Agreement will also secure the following S.278 works:
- Provide a 1.5m wide cycle contra-flow track on Hopton Street on the eastern side to link with the contra-flow on Holland Street.
  - The footways abutting the development on Hopton Street on the development side, repaved with Yorkstone slabs and 300mm wide silver grey natural granite stone.
  - Introduce a raised table at the proposed crossing point on Hopton Street.
  - Vehicle crossovers into the development must be upgraded to SSDM standards.
  - Resurface the whole carriageway of Hopton Street.
  - Promote a TMO to regulate the proposed highway changes.
303. In the event that an agreement has not been completed by 30 November 2020, the committee is asked to authorise the director of planning to refuse permission, if appropriate, for the following reason:

In the absence of a signed S106 legal agreement there is no mechanism in place to secure adequate provision of affordable housing and mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to Saved Policy 2.5 Planning Obligations of the Southwark Plan 2007, Strategic Policy 14 Delivery and Implementation of the Core Strategy ( 2011) Policy 8.2 Planning Obligations of the London Plan (2016) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

#### **Mayoral and borough community infrastructure levy (CIL)**

304. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. While Southwark's CIL will provide for infrastructure that supports growth in Southwark. In this instance an estimated Mayoral CIL payment of £2,121,301.16 and a Southwark CIL payment of £9,148,839.49 are due.

#### **Community involvement and engagement**

305. The developer appointed Kanda Consulting, a public consultation company, to undertake pre-application consultations and engagement with resident, community and stakeholder groups.
306. Two phases of residential and community engagement were completed over a seven month period between October 2017 and April 2018. Activities undertaken as part of the consultation include:
- Local meetings to discuss the proposals;
  - Two public exhibitions spread over three days presenting the detailed design proposals. The exhibitions were held on the 20<sup>th</sup> and 23<sup>rd</sup> of February and attended by



- a total of 79 people;
- Further public exhibition on 17<sup>th</sup> April 2018 attended by a total of 28 people;
- Collection of feedback forms at the public exhibitions to enable residents, community and stakeholder groups to express their views on the development proposals;
- Meetings with Ward Councillors;
- Newsletter distribution;
- Creation of a project website where all consultation material is available.

307. As part of its statutory requirements the Local Planning Authority sent letters to surrounding residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. Details of consultation and any re-consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices. The responses received are summarised later in this report.

### **Consultation responses from external consultees**

308. Summarised below are the consultation responses raised by external consultees, along with an officer response:

309. Camden Council: No objection.

**Response:** Noted.

310. Environment Agency: No objections given that suitable amendments have been made to the Flood Risk Assessment.

**Response:** Noted.

311. Greater London Authority: The GLA accept the principle of the proposed affordable housing offer and will further scrutinise the final detail of the offer and reviews at Stage II. The proposed design changes are supported and are considered to be in broad compliance with the design principles established as part of the original application. The GLA also request that the applicant address transport issues with respect to the vehicle parking quantum, design and management, site access and cycle parking provision. Transport matters which must be secured by planning condition/obligation include: a car parking design and management plan, cycle parking provision and design, a legible London contribution, a travel plan, a construction and servicing plan and a Crossrail contribution. In terms of energy and sustainability the approach proposed would achieve a 38% carbon dioxide reduction for the residential component of the scheme and a 35% reduction for the non-residential component. Whilst the principles of the energy strategy are supported, the applicant must explore the potential for additional measures to deliver further carbon dioxide reductions (particularly for the residential component). Once all opportunities for securing further feasible on-site savings have been exhausted, a carbon offset contribution should be secured to mitigate any residual shortfall.

**Response:** The applicant's affordable housing offer would equate to an in lieu payment of £38.5 million secured as part of the original consent alongside 105 onsite homes. The proposed offer has been viability tested and the council's viability consultants agree that the proposed offer equates to the maximum reasonable amount of affordable housing that the scheme can viably deliver. This would be secured as part of the S106 alongside the relevant review mechanisms and will be further scrutinised by the GLA at Stage II. In terms of parking the applicant has now reduced the number of residential car parking spaces from 105 to 70 which equates to a 0.25 provision which is a significant reduction on the 0.41 parking ratio of the approved scheme and the 0.31 parking ratio of the current scheme when originally submitted. In terms of site access and egress, the proposed

development aligns with the consented scheme and the principles that were established as part of the consent, which has now been implemented. Cycle parking will be secured by condition and issues relating to cycle hire, legible London, Travel Plan, CEMP and car park management plan will be secured under the S106 Agreement. In terms of energy and carbon dioxide reductions the proposal complies with the London Plan and an Energy Strategy will be secured under the S106, alongside the relevant Carbon Offset payment to make the residential component of the site carbon zero.

312. Heathrow Airport Limited: No objections subject to the imposition of a Construction Management Strategy condition.  
**Response:** Noted and agreed, the relevant condition will be attached to any consent issued.
313. Historic England: No objections.  
**Response:** Noted and agreed.
314. London Fire Authority: No response subject to providing an undertaking access for fire appliances as required by Part B5 of the current Building Regulations Approved Document and adequate water supplies for fire fighting purposes, will be provided.  
**Response:** Noted and agreed, the relevant undertaking will be secure by condition on any planning consent issued.
315. London Underground: No objections.  
**Response:** Noted.
316. NATS Safeguarding: No safeguarding objections.  
**Response:** Noted.
317. Natural England: No objection.  
**Response:** Noted.
318. Network Rail: No objections subject to conditions and compliance with Network Rail advice regarding impacts on Network Rail land and infrastructure; future maintenance; drainage; plant and materials; scaffolding; piling; fencing; lighting; noise and vibration; and vehicle incursion.  
**Response:** Noted and agreed, the relevant conditions and informatives will be attached to any consent issued.
319. Port of London Authority: No objections to the principle of the redevelopment and note that there is an existing implemented permission. The PLA would encourage the use of the River Thames for the movement of construction materials and waste. The PLA also request that specific reference be made in the Travel Plan to Riverbus services including timetable details from both Bankside and Blackfriars piers. Given the location of the development in such close proximity to the river, the PLA request to be consulted on any external lighting strategy in order to assess potential impacts in river traffic and ecology.  
**Response:** Noted, conditions regarding external lighting will be attached to any consent issued and the PLA will be considered a consultee on these details.
320. Royal Borough of Greenwich: No objections.  
**Response:** Noted.
321. Thames Water: No objections subject to conditions.  
**Response:** Noted, the relevant conditions which relate to water supply, proximity to water infrastructure and proximity to Thames Water assets.

322. Tower Hamlets Council: No comments.  
**Response:** Noted.
323. Transport for London: Transport for London have responded that the proposed development should be car free with the exception of Blue Badge car parking. TfL have also raised concerns about the vehicle access from Southwark Street and why servicing cannot take place from Hopton Street. TfL would like to see cycle parking increased to the Draft New London Plan standards and contributions towards cycle hire and wayfinding.  
**Response:** The relevant financial contributions will be secured as part of the S106 Agreement. The provision of a servicing access from Southwark Street as opposed to the much quieter and narrower Hopton Street is preferred and in line with the consented scheme which was supported by TfL. The level of car parking has been reduced from a ratio of 0.41 to 0.25 from the consented scheme which is an improvement. Cycle parking will be maximised through condition however the current levels being provided are compliant with current adopted policy.
324. Twentieth Century Society: The Twentieth Century Society considers that the existing Sampson House should be protected from demolition and retained as a non-designated heritage asset and there are concerns that an assessment of the historic significance of the existing building has not been properly considered.  
**Response:** The previous planning consent accepted the loss of Sampson House which has now been largely demolished as part of the previous development proposals. English Heritage (now Historic England) previously took a decision not to list Sampson House.
325. Westminster City Council: No objections.  
**Response:** Noted.

#### **Consultation response from neighbours and representees**

326. In response to public consultation, a total of 83 responses have been received. Of these, 79 were in objection and four were in support neutral. Summarised below are the objections raised by members of the public with an officer response:
327. Objection – The developers offered to make improvements to the glazing and balconies on Falcon Point in order to alleviate impacts from the proposed development and induce support from local residents. It has since become clear that the various options put forward to some residents are no longer an option as a decision on the type of glazing and balcony enclosure has been taken without the full agreement of all residents.  
**Response** – The works being undertaken to replace glazing and provide balcony enclosures at Falcon Point is a private agreement between the developer and residents of Falcon Point. This is a civil matter that does not form part of the formal planning process or constitute a planning obligation on either the current or previous scheme. As such this should not be considered in reaching a decision on the current application.
328. Objection – The developer agreed to undertake individual daylight and sunlight assessments for the residents of Falcon Point but this has not been undertaken.  
**Response:** A full daylight and sunlight assessment has been undertaken and presented as part of the Environmental Statement. This covers all affected homes and details individual results for each affected room/window at each address.
329. Objection – The development would have an adverse impact on Falcon Point in terms of daylight and sunlight.  
**Response:** The daylight and sunlight impacts at Falcon Point are addressed in detail in

the main body of the report. However the impacts can be summarised as:

330. 1-30 Falcon Point - When comparing the impact of the proposed scheme against the consented scheme only one additional window at 1-30 Falcon point would experience a noticeable reduction which would be 23.6% VSC, whereas 14 windows would experience some improvements to their overall VSC. The impact on this building is therefore considered to be acceptable and in line with the impacts of the extant scheme.
- 31-42 Falcon Point - In comparison to the consented scheme the window experiencing a 60% reduction in VSC would only see a real terms loss of VSC of 0.7% in comparison to the consented scheme. As such the proposed VSC impacts are consistent with the extant scheme as no windows would experience any noticeable additional loss of VSC. Additionally, all 18 rooms assessed for NSL would remain compliant with the BRE. The overall impact on this property is considered acceptable due to the high level of NSL compliance and comparable impacts to the extant scheme.
- 43-46 Falcon Point - An assessment has taken place to 28 windows and 18 rooms. 20 windows would remain BRE compliant with two windows experiencing minor losses of between 23.4% - 24.1% VSC, five windows with moderate losses of between 35.6% a-36.8% VSC and one window with a loss of 40% VSC which would be categorised as major. All of the VSC losses are in line with those experienced as part of the consented scheme and no additional noticeable VSC impacts compared to the extant scheme would be experienced. Additionally, all 21 rooms would continue to have BRE compliant NSL which is positive. Overall, the impacts to this building are consistent with the extant scheme and are considered acceptable.
- 57-72 Falcon Point - Whilst there would be five windows experiencing a loss of VSC beyond that of the consented scheme, these are windows which had low VSC values to begin with and as such the percentage change in VSC is disproportionate to the actual real terms loss of VSC which in many cases is less than 1% VSC. Additionally, all 24 rooms would continue to have BRE compliant NSL which is positive. Overall, the impacts to this building are consistent with the extant scheme and are considered acceptable.
- 85-110 Falcon Point - 32 windows serving 27 rooms have been assessed for VSC and NSL respectively. All but one window would continue to meet the BRE with the affected window having a minor reduction of 26.6% VSC and would continue to be served by unaffected windows. All 27 rooms would continue to be BRE compliant in terms of NSL. Additionally there would be no further impacts to those identified as part of the extant scheme and as such the impact on this building is considered acceptable.
331. Objection – It is not clear if the floorplans and data used in the daylight and sunlight assessment has been verified for accuracy.  
**Response:** The principle assessment of the daylight and sunlight assessment is based on Vertical Sky Component which itself is based on windows, the size and location of which are freely available to the daylight and sunlight consultants. Details of internal layouts are largely available from the planning register and reviewing plans from previous applications.
332. Objection – The proposed development would have a significant adverse impact on the local residents in terms of a loss of daylight and sunlight.  
**Response:** The proposed development would have a degree of impact on local residents and spaces in terms of an impact on daylight and sunlight however these are considered to be in line with the impacts set out in the consented scheme and are consistent with the impacts of developing central London sites. There would be no impacts above and beyond those established as part of the existing and implemented consent that would result in any significant adverse additional impacts.
333. Objection – The daylight and sunlight assessment fails to take into account the cumulative impact of development.

**Response:** The ES has considered the cumulative impact of the development and the impact of the consented masterplan for the site (Ludgate and Sampson House). In terms of daylight and sunlight impacts it has been demonstrated that the proposed development would have no significant additional adverse impacts over and above the consented scheme. Where there are additional impacts they are considered to be minor in nature and are set out in the daylight and sunlight section of the report.

334. Objection – There would be daylight impacts to the homes at 65 Hopton Street.  
**Response:** 280 windows serving 180 rooms have been assessed at this building. The VSC results demonstrate that 114 windows would meet the BRE criteria whilst 35 windows would experience a minor impact of between 20.6% and 29.8% loss of VSC. There would be a moderate adverse impact to 86 windows whereby there would be a loss of VSC of between 39.8% and 39.6% VSC. The remaining 45 windows would experience losses of VSC in excess of 40% which would be a major adverse impact. Looking at the NSL assessment, 175 of the 180 rooms would meet the BRE criteria and as such would experience a negligible impact. The five remaining rooms would experience reductions of between 20 and 29.9% which would be minor adverse in nature. In comparison to the consented scheme there would be 29 windows that would experience additional VSC impacts however these would all be in the range of 20% - 29.9% and as such would be minor in nature. Additionally, there would be 56 windows that would experience improved VSC levels in comparison to the consented scheme, this is a result of the omission of Building E which sat opposite 65 Hopton Street. Overall, given the fact that there is a high level of NSL compliance and that the impacts on VSC are comparable with the extant scheme including positive impacts to 56 windows, the proposed development is considered to have an acceptable impact on this building.
335. Objection – Local green spaces will be significantly overshadowed.  
**Response:** Given the removal of one of the consented buildings on Hopton Street, it is considered that daylight and sunlight levels at street level and public open spaces will be either in line with or an improvement on the consented scheme.
336. Objection – The altered position and mass of building SH-4 will have an adverse impact on the residents of Falcon Point and Bankside Lofts. The building should be reduced in size and moved westwards.  
**Response:** The position of Building SH-4 has not changed from the original consent. The massing has changed slightly in that the previously projecting balconies are now inset balconies as the façades have pushed out. Whilst it does take building SH-4 marginally closer to Falcon Point it does not have any adverse impact and the minimum separation distances set out in the SPD are still met.
337. Objection – The residents of Falcon Point will be affected by solar glare.  
**Response:** The applicants solar glare assessment does not identify any adverse impacts on Falcon Point. It is considered that the position of the proposed buildings is such that any potential solar glare impacts would be limited.
338. Objection – The proposed development would have adverse impacts in terms of solar glare.  
**Response:** Whilst there are some instances of reflectivity at some surrounding junctions, these instances are limited, brief in nature and will be mitigated through the use of the driver's visor, traffic signals with sun visors and the completion of the Ludgate House development.
339. Objection – There will be a loss of privacy to Falcon Point.  
**Response:** The minimum separation distances set out in the SPD will be met and as such it is considered that a reasonable level of privacy would be maintained.

340. Objection – There would be adverse impacts on privacy of homes and amenity spaces at 65 Hopton Street.  
**Response:** The proposed development is located a sufficient distance from 65 Hopton Street to ensure there would be no privacy impacts. Furthermore, the removal of Building SH-E which was approved under the original consent, increases the separation distance from 65 Hopton Street.
341. Objection – The development would impact on views from 65 Hopton Street.  
**Response:** The development would be visible from 65 Hopton Street however it would not be overbearing or excessively dominant. Additionally, there are no statutory rights to a view over a third parties land.
342. Objection – There would be a negative impact on views from Falcon Point due to the location and position of the proposed buildings.  
**Response:** There is no right to a view over a third parties land.
343. Objection – Given that the development would block views to the west, the opening hours of the Tate viewing gallery should be restricted to protect existing and new resident's privacy.  
**Response:** The proposed development will have no bearing on the operating hours of or access to the Tate viewing gallery. The proposed development is far enough away from the viewing gallery that there would be no impact on privacy from the Tate.
344. Objection – The proposed buildings are excessive in scale, height and massing and there are no justifications for increasing the size of the scheme over what has already been consented.  
**Response:** As set out above, the scale and quantum of development is considered acceptable and the proposed development would have one less building than the consented scheme which gives more space to the public at street level.
345. Objection – There is no justification for the uplift in development over and above the consented scheme.  
**Response:** The proposed development has been assessed on its merits and it is considered that the uplift over the consented scheme is acceptable with minimal additional impact and an increase in benefits coming forward from the development such as additional affordable housing including on-site affordable homes as well as increased public space at street level.
346. Objection – The proposed development is overbearing.  
**Response:** The proposed development would largely be consistent with the approved scheme with the exception that the building on Hopton Street has been removed, resulting in a less overbearing relationship on Hopton Street.
347. Objection – The proposed development is too dense and results in an overdevelopment of the site.  
**Response:** The acceptability of the site for a high density, mixed use development incorporating tall buildings has already been established by the extant consent. High densities can be a consequence of redeveloping sites with tall buildings as the increase in floorspace vertically significantly exceeds what would be possible by redeveloping a site with low rise buildings. In gauging whether or not it is acceptable for a development to significantly exceed the recommended density levels officers must give weight to the location, public transport availability, quality of design, quality of public spaces, standard of accommodation and other benefits that may follow from the development such as employment. The density, scale and quantum of development is largely in line with that

established under the consented scheme which has now been implemented.

348. **Objection** – The development does not provide enough car parking.  
**Response:** The application site is in the Central Activities Zone in an area with the highest possible accessibility to public transport. Developments in this area should be car free however a level of car parking was agreed on the applicant's previous scheme which has been implemented and can be built out. As part of this development, officers have managed to negotiate a reduction in car parking and this will help to encourage walking, cycling and more sustainable modes of transport.
349. **Objection** – The proposed new road layout is hazardous and will not cope with the additional vehicular and pedestrian needs or movements.  
**Response:** The proposed road layout is considered acceptable. The conversion of Hopton Street to one way traffic will create a safer environment.
350. **Objection** – The new road layout will lead to additional congestion.  
**Response:** The councils Transport Team and Transport for London have both reviewed the application details and do not consider that the proposed road layout, which is consistent with the approved scheme, would lead to any additional congestion or vehicular/pedestrian safety issues.
351. **Objection** – The new road layout will impede resident's abilities to use their vehicles as they will not be able to access the road outside their lobbies from their garages without driving the long way around the proposed one way system.  
**Response:** The proposed road layout is considered to be beneficial as it will provide one way traffic and as such reduce the vehicle conflict that can occur with two way traffic on a narrow carriageway. The proposal to make Hopton Street one way would require a S.278 Agreement and this would be determined by the councils Highways department following consultation.
352. **Objection** – The development would result in increased traffic.  
**Response:** The councils Transport Team and Transport for London have reviewed the application. The Transport team are of the view that there would be no increase in traffic detrimental to the road network.
353. **Objection** – A taxi rank on Hopton Street will result in nuisance and additional traffic.  
**Response:** This would be located close the hotel and has capacity for three cars. It is not considered to operate at a level which would create any detrimental disturbance.
354. **Objection** – Resident safety would be compromised as the Fire Brigade and emergency services would not be able to access the spur road leading to Falcon Point.  
**Response:** The London Fire Authority have been consulted on the proposed development and following a review of the application they have raised no objections.
355. **Objection** – The development would result in pedestrian congestion on the Thames Path.  
**Response:** the development would result in an additional east west route through the site linking to Upper Ground and as such is not likely to result in congestion on the Thames Path.
356. **Objection** – Space has not been protected for the future expansion of Blackfriars Station.  
**Response:** Transport for London and Network Rail have been consulted on the application and have not raised this as an issue.
357. **Objection** – The relocation of SH-4 is such that it would take up excessive space on the public footpath and the road.  
**Response:** The public footpath and carriageway width have been reviewed by the

council's highways team and are considered acceptable.

358. Objection – Vital services to Falcon Point would be compromised by the development due to access issues.  
**Response:** The proposed development would not result in any restricted access to vehicles on surrounding roads.
359. Objection – Hopton Street should remain two way in order to reduce congestion, noise and improve safety and access.  
**Response:** The conversion of Hopton Street to one way is considered to be an improvement that should reduce congestion and provide a safer pedestrian environment.
360. Objection – The scheme should be gated to prevent pedestrians walking through the area at night.  
**Response:** The scheme will not be gated. The creation of new routes through the site is considered to be one of the benefits of the scheme.
361. Objection – The proposed hotel and cultural venue will increase vehicle traffic and disturbance.  
**Response:** The councils Transport Team and TfL have reviewed the application and do not consider that the hotel or cultural venue would have any adverse impact on the road network.
362. Objection – There is a lack of provision for pedestrians moving southwards to Southwark Street and beyond. This junction should be improved and a new crossing created.  
**Response:** As Hopton Street would become one way the junction at Southwark Street would no longer see cars exiting from Hopton Street onto Southwark Street and this is considered to be beneficial. There is an existing pedestrian crossing close to the junction.
363. Objection – The car park entrance and car lifts will result in disturbance to adjacent residents.  
**Response:** The car park entrance and car lifts will not result in any excessive noise levels that could lead to disturbance.
364. Objection - A vehicular route should be provided through the site to prevent any additional traffic on Hopton Street.  
**Response:** The proposed development is considered to be acceptable in terms of its layout and will minimise any impact on the local road network, including Hopton Street.
365. Objection – The proposed drop off arrangements for the hotel are unacceptable and should take place on site instead of off site.  
**Response:** The drop of facilities for the hotel are located off Hopton Street and are considered acceptable and appropriate.
366. Objection – The new road layout would compromise emergency service vehicle access.  
**Response:** The changes to the road layout at the north of the site are minimal and are not considered to reduce access for emergency services. The London Fire Authority have been consulted on the proposed development and following a review of the application they have raised no objections.
367. Objection – The applicant has failed to demonstrate how the development would be managed both in terms of construction and post completion.  
**Response:** The development will need to be constructed in accordance with a Construction Environmental Management Plan which will be a requirement of any consent issued and will be secured as part of any S106 Agreement.



368. Objection – The demolition and construction phase will have significant impacts on Falcon Point in terms of noise, vibration and dust/air quality. This is having an adverse impact on resident's ability to enjoy their homes.  
**Response:** Demolition works are currently being carried out under the previous consent and are subject to a detailed management plan. Should consent be granted for the proposed development then the construction phase will be bound by the requirements of a detailed Construction management Plan in order to minimize impacts to neighbours, local people and the surrounding area,
369. Objection – The proposed development does not provide the required amount of affordable housing and as such is unacceptable.  
**Response:** Taking into account the commuted sum of £38.5 million and the 37 on-site affordable homes, the proposal would provide 41% affordable housing which is in excess of the minimum 35% set out in policy and has been viability tested as the maximum reasonable amount.
370. Objection – The development does not promote diversity as it caters only to the affluent 25-39 age group as well as investors. It also prioritises the needs of tourists above the needs of existing residents.  
**Response:** The proposed development would offer affordable homes for Londoners as well as increased connectivity at street level and public open space which would be a benefit for local residents alongside the improved retail offering.
371. Objection – The development includes a hotel which is not needed in the area as there are already too many hotels.  
**Response:** Current planning policy supports visitor accommodation in this location. The proposed hotel forms part of a larger, comprehensive mixed use development and as such would not dominate the local area or displace other land uses. Furthermore the proposed hotel sits immediately adjacent to Blackfriars Station in a highly accessible location close to the riverside and the various visitor attractions of the Southbank. A hotel is therefore considered an appropriate and acceptable land use in this location that is fully compliant with development plan policy and would not harm the character of the area or create an over-dominance of visitor accommodation.
372. Objection – There is no need for a cultural venue in this location as there are already many cultural offerings.  
**Response:** The proposal would include the provision of cultural floorspace within the basement, basement mezzanine and ground floor area of building SH-5 which would open out onto a new public space fronting the river. The provision of cultural space is supported given the Strategic Cultural Area designation and accordingly is a positive aspect of the scheme that would complement the existing cultural offerings on the Southbank.
373. Objection – The new shops and restaurants will make the local area into a busy, noisy and late night destination. They will cause undue disturbance.  
**Response:** The provision of new town centre uses such as retail is supported by saved Southwark Plan Policy 1.7 since the site lies in a town centre. The retail units would activate the ground floor of the development, particularly Hopton Street and the railway viaduct. The retail units would serve the proposed increase in population and contribute to the vitality and viability of the district town centre. The site previously had a very harsh and inactive frontage whereas the proposal would create a much more attractive and vibrant street environment with retail opening out onto streets and the newly formed public space with opportunities to provide tables and chairs outside, encouraging visitors to stay for longer periods. The amount and scale of provision is considered to be

acceptable and would help to meet the needs of residents, workers and visitors in the area.

374. Objection – The children’s play area on Hopton Street will result in disturbance.  
**Response:** Developments are required to provide children’s play areas. Providing it at street level makes it accessible to all which is to be encouraged. On this part of the Southbank it is not considered that a small children’s play area would lead to any significant levels of disturbance.
375. Objection – The siting of the children’s playground would result in excessive noise disturbance to residents and would compromise the safety of children.  
**Response:** Children’s play parks are a common amenity space. They do not compromise the safety of children, who should be supervised by their responsible adults at all times. The development would not result in excessive noise disturbance to residents.
376. Objection – The development would have an impact on the safeguarding and health and safety of children.  
**Response:** The proposed development would not result in any risk to the safeguarding or health of children.
377. Objection – The children’s playground will be a draw to people from outside the area which is unfair and would lead to antisocial behavior.  
**Response:** The children’s playground is primarily to serve children living in the development but can be used by other children given its location at street level. The use of the playground by children is not anticipated to have a detrimental impact on current residents in terms of disturbance.
378. Objection – The public spaces would lead to excessive noise disturbance and would lead to disturbance from skateboarders.  
**Response:** The application site is located in Central London, on the Southbank and the public spaces of the development are not considered to be of such a scale that they will lead to any significant additional levels of noise and disturbance.
379. Objection – The cultural venue and square will result in excessive noise.  
**Response:** The provision of a cultural venue in this location is compliant with policy and subject to appropriate management and control of the hours of use it is not considered that it would result in any excessive disturbance.
380. Objection – Outdoor seating for cafes and bars would result in excessive noise and disturbance.  
**Response:** Opening hours and management conditions would ensure there would be no adverse impacts.
381. Objection – The proposed build programme is too long and would lead to too much disturbance, it should be limited to two years.  
**Response:** It would not be feasible to build a development of this size within two years.
382. Objection – The re-opening of the toilets at Blackfriars Station would be a nuisance.  
**Response:** The opening of the Blackfriars Station toilets has already been approved as part of the previous consent and do not form part of the current application.
383. Objection – The development would result in excessive wind flows.  
**Response:** Wind microclimate has been considered as part of the ES taking into account pedestrian comfort and safety during construction and once the development has been completed and is operational. The ES notes that once the development is completed the

wind conditions at ground level thoroughfares and at building entrances will be appropriate to their use with no adverse impacts.

384. Objection – The development would lead to significant wind impacts to residents and visitors.  
**Response:** Wind microclimate has been considered as part of the ES taking into account pedestrian comfort and safety during construction and once the development has been completed and is operational. The ES notes that once the development is completed the wind conditions at ground level thoroughfares and at building entrances will be appropriate to their use with no adverse impacts.
385. Objection – The development would lead to significant health impacts as a result of increased pollution.  
**Response:** Whilst there may be some short terms impacts as a result of the construction process, the completed development is not likely to lead to any health impacts and conditions will be imposed around emission and air quality. The development will result in at least a 35% reduction in carbon emissions. Air quality and noise impacts through the construction process would be managed and mitigated by way of a conditioned environmental management plan.
386. Objection – Resident would be put at risk from additional flooding risks.  
**Response:** The Environment Agency have been consulted on the proposed development and have raised no objections.
387. Objection – The consultation has not been comprehensive or inclusive.  
**Response:** The applicant undertook their own consultation in advance of the application. The council then undertook a detailed, extensive and long duration consultation on the application including sending letters, site notices and press adverts. The Consultation is considered to have been reasonable.
388. Objection - The development would have an adverse impact on health including from CO2 emissions and from an increased Electric and Magnetic Field (EMF) due to the increased WiFi.  
**Response:** The proposed development would result in a 35% reduction in carbon emissions over the 2013 building regulations. It is not considered that there would be any adverse impacts from increased WiFi.
389. Objection – The developer should not be allowed to reduce the quality of the scheme if it becomes unprofitable.  
**Response:** The quality of the scheme, materials, finishes and detailed design will be conditioned requirements of the planning consent.
390. Objection – The development does not provide enough green space.  
**Response:** The development provides more green/open space than the previous consent and as such is considered to be an improvement on the consented scheme.
391. Objection – The developer has purchased the road and land at Falcon Point Pizza which demonstrates a lack of honesty and openness on the part of the council and the developer.  
**Response:** The developers adjacent land purchases, private agreements or land ownership is not a material planning consideration.
392. Objection – Sampson House has architectural merit and should not be demolished.  
**Response:** Sampson House is now in the advanced stages of demolition.

393. Objection – The proposed development would have several environmental impacts that would affect health.

**Response:** The Environmental Impact Assessment did not identify any long terms impacts that would adversely affect health.

394. Objection – Adjacent residents would be adversely affected by light pollution.

**Response:** Light pollution can be minimised and a condition will be imposed to secure a lighting strategy to ensure light spill and disturbance from light are adequately mitigated.

395. Objection – Outdoor seating for cafes and bars would result in excessive noise and disturbance.

**Response:** Opening hours and management conditions would ensure there would be no unreasonable adverse impacts.

### **Community impact and equalities assessment**

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

397. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

398. 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:

1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
2. 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 connected to that characteristic
  - Take steps to meet 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
3. 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.

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

### **Human rights implications**

400. 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.

401. This application has the legitimate aim of providing new comes, offices, retail opportunities and cultural space alongside a new and enhanced public realm. 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.

**Positive and proactive statement**

402. The council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
403. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

**Positive and proactive engagement: summary table**

Was the pre-application service used for this application?	YES
If the pre-application service was used for this application, was the advice given followed?	YES
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	YES
To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date?	YES

**Other matters**

404. None identified.

**CONCLUSION**

405. The principle of redeveloping this site for a high density, mixed use development has been accepted by virtue of the previous consent and continues to be acceptable under the current application. Redevelopment of the site to provide new homes, hotel, retail, office, and leisure space is welcomed and the improved connectivity and public realm will be beneficial to the local area and people using this important part of the south bank. The range of uses being proposed is in line with development plan policy aspirations to improve the area and maximise the number of homes and jobs.
406. The overall reduction in employment floorspace on the site is considered acceptable given that the replacement office floorspace will be modern and high quality which will meet the needs of current officer users and provide additional jobs within the borough. It is also acknowledged that the reduction in employment floorspace was accepted on the

previous consent and that requiring full re-provision on the Sampson House site would limit the ability to maximise housing provision and other uses suitable for the site's location within the Central Activities Zone.

407. The uplift in the number of homes and the provision of on-site affordable housing is a significant improvement over the consented scheme and this is welcomed. The provision of on-site affordable housing alongside a payment in lieu is considered to maximise the scheme's ability to contribute to the supply of affordable housing. The principle of an in lieu payment is considered acceptable given the sites specific circumstances and history. The submitted viability assessment has been scrutinised by experts Avison Young who have concluded that the affordable housing offer is the maximum the development can support whilst remaining viable. Reviews in the event of a delayed start, and at the late stage when being occupied, will ensure that any improvement in viability secures an increased in lieu affordable housing payment.
408. The provision of new retail opportunities will provide appropriate shops and services for the uplift in residents, workers and visitors to the area and aligns with policy requirements. The site is located within a Strategic Cultural Area and as such the provision of a Class D1/D2 space that could be used as an art gallery or museum is fully supported. The provision of this space will serve to bolster the current provision of cultural venues in the locality and the wider south bank.
409. Both the Southwark Plan and current London Plan support hotel and visitor accommodation in this area and the provision of a hotel in such an accessible location, as part of a large mixed use development, is supported. Providing a hotel as part of a large mixed use scheme that includes retail, office and new homes is such that it will not dominate the local area or mix of uses.
410. The development would continue to provide for residential car parking in an area where development should be car free however the level of car parking has been significantly reduced from the level that was previously consented. Given that a higher level of car parking was previously approved on the implemented consent and that the level of car parking has been significantly reduced as part of the current proposal, it is not considered that the development could reasonably be refused on the basis of not being car-free.
411. The development would bring forward various benefits for sustainable transport including new routes through the site in both east/west and north/south directions as well as improved access to cycle hire facilities. The substantial public realm improvements with the creation of two new east-west routes which will significantly improve permeability and connectivity in the area. The proposal would provide an extensive improvement to the streetscape together with new active frontages which would improve the experience for pedestrians, and provide for natural surveillance. The new public spaces are a particular benefit of this development, offering a range of spaces with distinct characters including a substantial 'cultural space' at the entrance to the cultural venue.
412. The design of the new buildings, which in some cases are significantly taller than their predecessors on the consented scheme, is considered to be of the highest quality and will make a substantial, positive contribution to the skyline of London and the cluster of tall buildings at the northern end of Blackfriars Road. The buildings would have limited impacts on views and would not materially impact any LVMF views. There would be limited impact on identified heritage assets.
413. It is acknowledge that there would be impacts on nearby residents in terms of daylight and sunlight however these are considered to be acceptable both in isolation and in the context of the impacts established as part of the consented scheme. The development

does provide for gaps between buildings and views across the site and the omission of building SH-E from the consented scheme provides additional relief on Hopton Street. The proposed impacts are therefore considered acceptable in the context of the consented scheme, the flexible application of the BRE guidelines and the central London location.

414. The impacts identified in the Environmental Statement have been assessed and taken into account and should be considered in determining the application. No impacts of a significant scale have been identified which are not capable of being mitigated through detailed design, through conditions, or through provisions in the s106 agreement.
415. It is therefore recommended that planning permission be granted, subject to conditions, the completion of a S106 Agreement and referral to the GLA.

### BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 1412 Council website: www.southwark.gov.uk

### APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Relevant planning history
Appendix 4	Recommendation

**AUDIT TRAIL**

<b>Lead Officer</b>	Simon Bevan, Director of Planning	
<b>Report Author</b>	Terence McLellan, Team Leader	
<b>Version</b>	Final	
<b>Dated</b>	12 February 2020	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>		12 February 2020



## APPENDIX 1

### Consultation undertaken

**Site notice date:**

**Press notice date:** n/a.

**Case officer site visit date:** n/a

**Neighbour consultation letters sent:** 25/06/2018

### Internal services consulted

Flood Risk Management & Urban Drainage  
 Highways Licensing  
 Highways Development and Management  
 Waste Management  
 Ecology  
 Archaeology  
 Design and Conservation Team [Formal]  
 Urban Forester  
 Transport Policy

### Statutory and non-statutory organisations

Environment Agency  
 Thames Water  
 Transport for London  
 Network Rail  
 Great London Authority  
 EDF Energy

London Fire & Emergency Planning Authori  
 London Underground  
 Metropolitan Police Service (Designing O  
 Natural England - London & South East Re  
 London Fire & Emergency Planning Authori  
 Planning Policy  
 London Underground  
 Natural England - London & South East Re  
 Environment Agency  
 Network Rail  
 Environment Agency

### Neighbour and local groups consulted:

101 Block C 70 Holland Street London  
102 Block C 70 Holland Street London  
103 Block C 70 Holland Street London  
1502 Block B 60 Holland Street London  
1503 Block B 60 Holland Street London  
1601 Block B 60 Holland Street London  
203 Block C 70 Holland Street London  
206 Block C 70 Holland Street London  
205 Block C 70 Holland Street London  
202 Block C 70 Holland Street London  
106 Block C 70 Holland Street London  
105 Block C 70 Holland Street London  
201 Block C 70 Holland Street London  
603 Block C 70 Holland Street London  
1103 Block C 70 Holland Street London  
1105 Block C 70 Holland Street London  
1201 Block C 70 Holland Street London  
1102 Block C 70 Holland Street London  
1003 Block C 70 Holland Street London  
1005 Block C 70 Holland Street London  
1101 Block C 70 Holland Street London  
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1301 Block C 70 Holland Street London  
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1205 Block C 70 Holland Street London  
1002 Block C 70 Holland Street London  
705 Block C 70 Holland Street London  
801 Block C 70 Holland Street London  
802 Block C 70 Holland Street London  
703 Block C 70 Holland Street London  
605 Block C 70 Holland Street London  
701 Block C 70 Holland Street London  
Office 242 Blackfriars Road London  
242B Blackfriars Road London SE1 9UF  
Seventh Floor Sea Containers House 18 Upper Ground  
Third Floor 95 Southwark Street London  
Fourth Floor 95 Southwark Street London  
Ground Floor Centre 128 Southwark Street London  
Unit 6 First Floor Front 5-11 Lavington Street London  
Excluding Part First Floor Chadwick Court 15 Hatfields  
Unit 6 First Floor Rear 5-11 Lavington Street London  
Arches 3A And 3D Burrell Street London  
Basement Unit 7 5-11 Lavington Street London  
Second Floor 95 Southwark Street London  
Third To Fourth Floor Friars Bridge Court 41-45 Blackfriars Road  
Rear Of Ludgate House 245 Blackfriars Road  
Railway Arch 12 Chancel Street London  
Railway Arch 11 Chancel Street London  
Versailles Court 3 Paris Garden London  
Ground Floor 95 Southwark Street London  
First Floor 95 Southwark Street London  
Third Floor Bastille Court 2 Paris Garden  
Unit 7 First Floor 5-11 Lavington Street London  
Unit 8 And Unit 9 First Floor 5-11 Lavington Street London  
Second Floor Bastille Court 2 Paris Garden

Car Park Lloyds Computer Centre Hopton Street  
 Unit 1 65 Hopton Street London  
 Unit 2 65 Hopton Street London  
 Second Floor And Third Floor 42-44 Dolben Street London  
 8 Chancel Street London SE1 0UX  
 Part Basement Front 42-44 Dolben Street London  
 Part Basement Rear 42-44 Dolben Street London  
 Flat 50 Gallery Lofts 69 Hopton Street  
 Flat 51 And 55 69 Hopton Street London  
 Flat 60 Gallery Lofts 69 Hopton Street  
 First Floor 91-93 Southwark Street London  
 Basement And Ground 91-93 Southwark Street London  
 Fourteenth Floor South Wing Sea Containers House 18 Upper Ground  
 Cpre Part Basement 128 Southwark Street London  
 Ground Floor Right 128 Southwark Street London  
 South Wing Eleventh Floor Left Sea Containers House 18 Upper Ground  
 B10 To B11 Part Basement 128 Southwark Street London  
 Second Floor 91-93 Southwark Street London  
 Fourth Floor 91-93 Southwark Street London  
 B01 To B03 Part Basement Excluding Basement Store East Rear 128 Southwark Street London  
 Tenth Floor South Wing Sea Containers House 18 Upper Ground  
 Unit 11 Lower Ground 5-11 Lavington Street London  
 Units 8 And 9 Lower Ground 5-11 Lavington Street London  
 Basement Ground First To Third Floors Sungard Court Sungard Court 4-5 Paris Garden  
 Unit 11 And 12 First Floor 5-11 Lavington Street London  
 Flat 69 Gallery Lofts 69 Hopton Street  
 First Floor 71 Hopton Street London  
 Unit 10 Lower Ground 5-11 Lavington Street London  
 Tate Modern Sumner Street London  
 Part Basement South Wing Sea Containers House 18 Upper Ground  
 Ninth Floor South Wing Sea Containers House 18 Upper Ground  
 85 Southwark Street London SE1 0HX  
 Fourth Floor Sungard Court 4-5 Paris Garden  
 71-79 Southwark Street London SE1 0JA  
 83 Southwark Street London SE1 0HX  
 Flat 23 5B Bear Lane London  
 Flat 24 5B Bear Lane London  
 Flat 25 5B Bear Lane London  
 Flat 22 5B Bear Lane London  
 Flat 19 5B Bear Lane London  
 Flat 20 5B Bear Lane London  
 Flat 21 5B Bear Lane London  
 Flat 28 18 Great Suffolk Street London  
 Flat 6 5B Bear Lane London  
 Flat 15 5B Bear Lane London  
 Flat 16 5B Bear Lane London  
 Flat 17 5B Bear Lane London  
 Flat 14 5B Bear Lane London  
 Flat 11 5B Bear Lane London  
 Flat 12 5B Bear Lane London  
 Flat 13 5B Bear Lane London  
 Flat 31 18 Great Suffolk Street London  
 Flat 51 18 Great Suffolk Street London  
 Flat 52 18 Great Suffolk Street London  
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 Flat 48 18 Great Suffolk Street London

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 Flat 56 18 Great Suffolk Street London  
 Flat 46 18 Great Suffolk Street London  
 Flat 36 18 Great Suffolk Street London  
 Flat 37 18 Great Suffolk Street London  
 Flat 38 18 Great Suffolk Street London  
 Flat 35 18 Great Suffolk Street London  
 Flat 32 18 Great Suffolk Street London  
 Flat 33 18 Great Suffolk Street London  
 Flat 34 18 Great Suffolk Street London  
 Flat 43 18 Great Suffolk Street London  
 Flat 44 18 Great Suffolk Street London  
 Flat 45 18 Great Suffolk Street London  
 Flat 42 18 Great Suffolk Street London  
 Flat 39 18 Great Suffolk Street London  
 Eleventh Floor South Wing Blue Fin Building 110 Southwark Street  
 Twelfth Floor Blue Fin Building 110 Southwark Street  
 Part Fifth Floor Friars Bridge Court 41-45 Blackfriars Road  
 Part First Floor West Friars Bridge Court 41-45 Blackfriars Road  
 First Floor Thameslink Friars Bridge Court 41-45 Blackfriars Road  
 Part Fifth Floor Kitchen Friars Bridge Court 41-45 Blackfriars Road  
 Units 7 To 10 Ground Floor 5-11 Lavington Street London  
 First Floor 18 Hatfields London  
 Second To Fourth Floor Rennie House 15-23 Rennie Street  
 Ground And First Floor Rennie House 15-23 Rennie Street  
 Ground Floor 18 Hatfields London  
 Part Basement Friars Bridge Court 41-45 Blackfriars Road  
 Second Floor And Third Floor 18 Hatfields London  
 Lower Ground Floor 18 Hatfields London  
 Basement To First Floor 138-140 Southwark Street London  
 Second Floor 138-140 Southwark Street London  
 Third Floor 138-140 Southwark Street London  
 Multisports Courts Hatfields London  
 Part Third Floor Rennie House 15-23 Rennie Street  
 Excluding Part Third Floor Rennie House 15-23 Rennie Street  
 Third Floor Blue Fin Building 110 Southwark Street  
 4 Canvey Street London SE1 9AN  
 6 Canvey Street London SE1 9AN  
 First Floor Blue Fin Building 110 Southwark Street  
 2 Canvey Street London SE1 9AN  
 Part Second Floor South Ludgate House 245 Blackfriars Road  
 Part Second Floor North Ludgate House 245 Blackfriars Road  
 12 Sumner Street London SE1 9JZ  
 Flat 1 5B Bear Lane London  
 Flat 2 5B Bear Lane London  
 Flat 3 5B Bear Lane London  
 5E Bear Lane London SE1 0UH  
 5A Bear Lane London SE1 0UH  
 Second Floor Excluding East Wing Blue Fin Building 110 Southwark Street  
 7 Canvey Street London SE1 9AN  
 20 Sumner Street London SE1 9JZ  
 3 Canvey Street London SE1 9AN

5 Canvey Street London SE1 9AN  
604 Block D 5 Sumner Street London  
Apartment 1506 55 Upper Ground London  
Apartment 1507 55 Upper Ground London  
Apartment 1508 55 Upper Ground London  
Apartment 1505 55 Upper Ground London  
Apartment 1502 55 Upper Ground London  
Apartment 1503 55 Upper Ground London  
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Apartment 1602 55 Upper Ground London  
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Apartment 1604 55 Upper Ground London  
Apartment 1601 55 Upper Ground London  
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Apartment 1709 55 Upper Ground London  
Apartment 1706 55 Upper Ground London  
Apartment 1703 55 Upper Ground London  
Apartment 1704 55 Upper Ground London  
Apartment 1705 55 Upper Ground London  
Flat 7 1 Treveris Street London  
Flat 8 1 Treveris Street London  
Flat 9 1 Treveris Street London  
Flat 6 1 Treveris Street London  
Flat 3 1 Treveris Street London  
Flat 4 1 Treveris Street London  
Flat 5 1 Treveris Street London  
30 Stamford Street London SE1 9LQ  
9 Upper Ground London SE1 9LP

20 Stamford Street London SE1 9LQ  
Flat 10 1 Treveris Street London  
Flat 11 1 Treveris Street London  
Hilton London Bankside 2-8 Great Suffolk Street London  
Units 1 And 2 1 Treveris Street London  
Unit A Blue Fin Building 110 Southwark Street  
Unit B Blue Fin Building 110 Southwark Street  
Basement 91-93 Southwark Street London  
Apartment 8 235 Blackfriars Road London  
Apartment 1208 55 Upper Ground London  
Apartment 1306 55 Upper Ground London  
Apartment 1307 55 Upper Ground London  
Apartment 1308 55 Upper Ground London  
Apartment 1305 55 Upper Ground London  
Apartment 1302 55 Upper Ground London  
Apartment 1303 55 Upper Ground London  
Apartment 1304 55 Upper Ground London  
Apartment 1205 55 Upper Ground London  
Apartment 1106 55 Upper Ground London  
Apartment 1107 55 Upper Ground London  
Apartment 1108 55 Upper Ground London  
Apartment 1105 55 Upper Ground London  
Apartment 1102 55 Upper Ground London  
Apartment 1103 55 Upper Ground London  
Apartment 1104 55 Upper Ground London  
Apartment 1202 55 Upper Ground London  
Apartment 1203 55 Upper Ground London  
Apartment 1204 55 Upper Ground London  
Apartment 1201 55 Upper Ground London  
Apartment 1109 55 Upper Ground London  
Apartment 1110 55 Upper Ground London  
Apartment 1111 55 Upper Ground London  
Apartment 3201 55 Upper Ground London  
Apartment 3202 55 Upper Ground London  
Apartment 3203 55 Upper Ground London  
Apartment 3106 55 Upper Ground London  
Apartment 3103 55 Upper Ground London  
Apartment 3104 55 Upper Ground London  
Apartment 3105 55 Upper Ground London  
Apartment 3402 55 Upper Ground London  
Apartment 3403 55 Upper Ground London  
Apartment 3404 55 Upper Ground London  
Apartment 3401 55 Upper Ground London  
Apartment 3006 55 Upper Ground London  
Apartment 3101 55 Upper Ground London  
Apartment 3004 55 Upper Ground London  
Apartment 3001 55 Upper Ground London  
Apartment 3002 55 Upper Ground London  
Apartment 3003 55 Upper Ground London  
Apartment 3405 55 Upper Ground London  
H 4 6 Paris Garden London  
H 5 6 Paris Garden London  
H 6 6 Paris Garden London  
H 3 6 Paris Garden London  
Second Floor Flat 134 Southwark Street London  
H 1 6 Paris Garden London  
H 2 6 Paris Garden London  
H 11 6 Paris Garden London

H 12 6 Paris Garden London  
H 13 6 Paris Garden London  
H 10 6 Paris Garden London  
H 7 6 Paris Garden London  
H 8 6 Paris Garden London  
H 9 6 Paris Garden London  
32 56 Hopton Street London  
Apartment 3604 55 Upper Ground London  
Apartment 3701 55 Upper Ground London  
Apartment 3702 55 Upper Ground London  
Apartment 3603 55 Upper Ground London  
Apartment 3406 55 Upper Ground London  
Apartment 3601 55 Upper Ground London  
Apartment 3602 55 Upper Ground London  
Apartment 3902 55 Upper Ground London  
Apartment 4001 55 Upper Ground London  
6 Paris Garden London SE1 8ND  
Apartment 3901 55 Upper Ground London  
Apartment 3801 55 Upper Ground London  
Apartment 3802 55 Upper Ground London  
Apartment 3803 55 Upper Ground London  
16 Falcon Point Hopton Street London  
17 Falcon Point Hopton Street London  
18 Falcon Point Hopton Street London  
36 Falcon Point Hopton Street London  
54 Falcon Point Hopton Street London  
55 Falcon Point Hopton Street London  
56 Falcon Point Hopton Street London  
53 Falcon Point Hopton Street London  
50 Falcon Point Hopton Street London  
51 Falcon Point Hopton Street London  
52 Falcon Point Hopton Street London  
1 Hoptons Gardens Hopton Street London  
10 Hoptons Gardens Hopton Street London  
11 Hoptons Gardens Hopton Street London  
9 Falcon Point Hopton Street London  
6 Falcon Point Hopton Street London  
7 Falcon Point Hopton Street London  
8 Falcon Point Hopton Street London  
5 Falcon Point Hopton Street London  
40 Falcon Point Hopton Street London  
41 Falcon Point Hopton Street London  
42 Falcon Point Hopton Street London  
4 Falcon Point Hopton Street London  
37 Falcon Point Hopton Street London  
38 Falcon Point Hopton Street London  
39 Falcon Point Hopton Street London  
47 Falcon Point Hopton Street London  
48 Falcon Point Hopton Street London  
49 Falcon Point Hopton Street London  
46 Falcon Point Hopton Street London  
43 Falcon Point Hopton Street London  
44 Falcon Point Hopton Street London  
45 Falcon Point Hopton Street London  
Apartment 2501 55 Upper Ground London  
Apartment 2404 55 Upper Ground London  
Apartment 2401 55 Upper Ground London  
Apartment 2402 55 Upper Ground London

Apartment 2403 55 Upper Ground London  
Apartment 2506 55 Upper Ground London  
Apartment 2601 55 Upper Ground London  
Apartment 2602 55 Upper Ground London  
Apartment 2505 55 Upper Ground London  
Apartment 2502 55 Upper Ground London  
Apartment 2503 55 Upper Ground London  
Apartment 2504 55 Upper Ground London  
Apartment 7 235 Blackfriars Road London  
Fourth Floor 71 Hopton Street London  
Flat 9 River Court Upper Ground  
100 Falcon Point Hopton Street London  
101 Falcon Point Hopton Street London  
Flat 8 River Court Upper Ground  
Flat 56 River Court Upper Ground  
Flat 6 River Court Upper Ground  
Flat 7 River Court Upper Ground  
106 Falcon Point Hopton Street London  
107 Falcon Point Hopton Street London  
108 Falcon Point Hopton Street London  
105 Falcon Point Hopton Street London  
102 Falcon Point Hopton Street London  
103 Falcon Point Hopton Street London  
104 Falcon Point Hopton Street London  
70 Falcon Point Hopton Street London  
90 Falcon Point Hopton Street London  
91 Falcon Point Hopton Street London  
92 Falcon Point Hopton Street London  
89 Falcon Point Hopton Street London  
87 Falcon Point Hopton Street London  
88 Falcon Point Hopton Street London  
97 Falcon Point Hopton Street London  
98 Falcon Point Hopton Street London  
99 Falcon Point Hopton Street London  
96 Falcon Point Hopton Street London  
93 Falcon Point Hopton Street London  
94 Falcon Point Hopton Street London  
95 Falcon Point Hopton Street London  
85 Falcon Point Hopton Street London  
75 Falcon Point Hopton Street London  
76 Falcon Point Hopton Street London  
Ipc Media Blue Fin Building 110 Southwark Street  
1002 Block D 5 Sumner Street London  
West Wing Twelfth And Thirteenth Floor Sea Containers House 18 Upper Ground  
Flat 617 Bankside House 24 Sumner Street  
Unit 16 100 Southwark Street London  
5-13 Great Suffolk Street London SE1 0NS  
Part A Fourth Floor 5-13 Great Suffolk Street London  
Part B Fourth Floor 5-13 Great Suffolk Street London  
1001 Block D 5 Sumner Street London  
703 Block D 5 Sumner Street London  
704 Block D 5 Sumner Street London  
801 Block D 5 Sumner Street London  
702 Block D 5 Sumner Street London  
605 Block D 5 Sumner Street London  
606 Block D 5 Sumner Street London  
502 Block B 60 Holland Street London  
403 Block B 60 Holland Street London



305 Block B 60 Holland Street London  
401 Block B 60 Holland Street London  
402 Block B 60 Holland Street London  
603 Block B 60 Holland Street London  
605 Block B 60 Holland Street London  
701 Block B 60 Holland Street London  
602 Block B 60 Holland Street London  
503 Block B 60 Holland Street London  
505 Block B 60 Holland Street London  
601 Block B 60 Holland Street London  
303 Block B 60 Holland Street London  
101 Block B 60 Holland Street London  
102 Block B 60 Holland Street London  
103 Block B 60 Holland Street London  
1001 Block A 50 Holland Street London  
1002 Block A 50 Holland Street London  
62 Holland Street London SE1 9JF  
205 Block B 60 Holland Street London  
301 Block B 60 Holland Street London  
302 Block B 60 Holland Street London  
203 Block B 60 Holland Street London  
105 Block B 60 Holland Street London  
201 Block B 60 Holland Street London  
202 Block B 60 Holland Street London  
702 Block B 60 Holland Street London  
1202 Block B 60 Holland Street London  
1203 Block B 60 Holland Street London  
1205 Block B 60 Holland Street London  
1201 Block B 60 Holland Street London  
1102 Block B 60 Holland Street London  
Second Floor 71 Hopton Street London  
235 Blackfriars Road London SE1 8NW  
Ground Floor 71 Hopton Street London  
Second To Third Floors 128 Southwark Street London  
107 Block D 5 Sumner Street London  
Apartment 4 235 Blackfriars Road London  
Apartment 5 235 Blackfriars Road London  
Apartment 6 235 Blackfriars Road London  
Apartment 3 235 Blackfriars Road London  
240 Blackfriars Road London SE1 8NW  
Apartment 1 235 Blackfriars Road London  
Apartment 2 235 Blackfriars Road London  
Fourth Floor 128 Southwark Street London  
1506 Block B 60 Holland Street London  
1105 Block B 60 Holland Street London  
703 Block B 60 Holland Street London  
705 Block B 60 Holland Street London  
801 Block B 60 Holland Street London  
1002 Block B 60 Holland Street London  
1003 Block B 60 Holland Street London  
1005 Block B 60 Holland Street London  
1001 Block B 60 Holland Street London  
902 Block B 60 Holland Street London  
903 Block B 60 Holland Street London  
905 Block B 60 Holland Street London  
Flat 81 18 Great Suffolk Street London  
Flat 82 18 Great Suffolk Street London  
Flat 83 18 Great Suffolk Street London

Flat 80 18 Great Suffolk Street London  
Flat 77 18 Great Suffolk Street London  
Flat 78 18 Great Suffolk Street London  
Flat 79 18 Great Suffolk Street London  
Flat 88 18 Great Suffolk Street London  
Flat 89 18 Great Suffolk Street London  
Twelfth And Thirteeneth Floors South Wing Sea Containers House 18 Upper Ground  
Flat 87 18 Great Suffolk Street London  
Flat 84 18 Great Suffolk Street London  
Flat 85 18 Great Suffolk Street London  
Flat 86 18 Great Suffolk Street London  
Flat 76 18 Great Suffolk Street London  
Flat 66 18 Great Suffolk Street London  
Flat 67 18 Great Suffolk Street London  
Flat 68 18 Great Suffolk Street London  
Flat 65 18 Great Suffolk Street London  
Flat 62 18 Great Suffolk Street London  
Flat 63 18 Great Suffolk Street London  
Flat 64 18 Great Suffolk Street London  
Flat 73 18 Great Suffolk Street London  
601 Block A 50 Holland Street London  
901 Block A 50 Holland Street London  
902 Block A 50 Holland Street London  
903 Block A 50 Holland Street London  
803 Block A 50 Holland Street London  
703 Block A 50 Holland Street London  
801 Block A 50 Holland Street London  
802 Block A 50 Holland Street London  
501 Block A 50 Holland Street London  
103 Block A 50 Holland Street London  
201 Block A 50 Holland Street London  
202 Block A 50 Holland Street London  
102 Block A 50 Holland Street London  
101 Block A 50 Holland Street London  
401 Block A 50 Holland Street London  
402 Block A 50 Holland Street London  
403 Block A 50 Holland Street London  
303 Block A 50 Holland Street London  
203 Block A 50 Holland Street London  
301 Block A 50 Holland Street London  
302 Block A 50 Holland Street London  
1902 Block C 70 Holland Street London  
2001 Block C 70 Holland Street London  
2002 Block C 70 Holland Street London  
1901 Block C 70 Holland Street London  
1705 Block C 70 Holland Street London  
1801 Block C 70 Holland Street London  
1802 Block C 70 Holland Street London  
101 Block D 5 Sumner Street London  
102 Block D 5 Sumner Street London  
103 Block D 5 Sumner Street London  
2101 Block C 70 Holland Street London  
2102 Block C 70 Holland Street London  
2201 Block C 70 Holland Street London  
1602 Block C 70 Holland Street London  
104 Block D 5 Sumner Street London  
406 Block D 5 Sumner Street London  
501 Block D 5 Sumner Street London

502 Block D 5 Sumner Street London  
405 Block D 5 Sumner Street London  
402 Block D 5 Sumner Street London  
403 Block D 5 Sumner Street London  
404 Block D 5 Sumner Street London  
601 Block D 5 Sumner Street London  
602 Block D 5 Sumner Street London  
603 Block D 5 Sumner Street London  
506 Block D 5 Sumner Street London  
503 Block D 5 Sumner Street London  
504 Block D 5 Sumner Street London  
505 Block D 5 Sumner Street London  
401 Block D 5 Sumner Street London  
203 Block D 5 Sumner Street London  
204 Block D 5 Sumner Street London  
205 Block D 5 Sumner Street London  
202 Block D 5 Sumner Street London  
105 Block D 5 Sumner Street London  
106 Block D 5 Sumner Street London  
201 Block D 5 Sumner Street London  
304 Block D 5 Sumner Street London  
305 Block D 5 Sumner Street London  
306 Block D 5 Sumner Street London  
303 Block D 5 Sumner Street London  
206 Block D 5 Sumner Street London  
301 Block D 5 Sumner Street London  
302 Block D 5 Sumner Street London  
401 Block C 70 Holland Street London  
402 Block C 70 Holland Street London  
403 Block C 70 Holland Street London  
Third Floor 71 Hopton Street London  
Ground Floor 99 Southwark Street London  
First Floor 128 Southwark Street London  
702-703 Bankside Lofts 65 Hopton Street London  
Part Ground Floor Sampson House 64 Hopton Street  
Ground Floor Left 128 Southwark Street London  
Basement And Ground Floor Dorset House 27-45 Stamford Street  
Fifth Floor To Eighth Floor Dorset House 27-45 Stamford Street  
Fourth Floor Dorset House 27-45 Stamford Street  
The Pavilion Hopton Street London  
Carillion Site Office Hopton Street London  
Ground Floor And First Floor 136 Southwark Street London  
Railway Arch 7 Chancel Street London  
405 Block A 50 Holland Street London  
105 Block A 50 Holland Street London  
205 Block A 50 Holland Street London  
305 Block A 50 Holland Street London  
Part Basement Store Friars Bridge Court 41-45 Blackfriars Road  
Part Fifth Floor Blue Fin Building 110 Southwark Street  
Excluding First Part Second Fourth Eleventh West And South Twelfth And Second EA Blue Fin Building  
110 Southwark Street  
Twelfth To Fourteenth Floors West Wing Sea Containers House 18 Upper Ground  
Second Floor South Wing Sea Containers House 18 Upper Ground  
Unit 5 New Kings Beam House 22 Upper Ground  
Basement Third To Seventh And Eleventh Floors Floors New Kings Beam House 22 Upper Ground  
First Floor New Kings Beam House 22 Upper Ground  
Ground Floor New Kings Beam House 22 Upper Ground  
Donovan Data Systems Blue Fin Building 110 Southwark Street

STR Global Ltd Blue Fin Building 110 Southwark Street  
United Media Group Services Ludgate House 245 Blackfriars Road  
701 Block D 5 Sumner Street London  
902 Block D 5 Sumner Street London  
903 Block D 5 Sumner Street London  
904 Block D 5 Sumner Street London  
901 Block D 5 Sumner Street London  
802 Block D 5 Sumner Street London  
803 Block D 5 Sumner Street London  
804 Block D 5 Sumner Street London  
Basement Front 95 Southwark Street London  
Basement Centre 95 Southwark Street London  
Basement Rear 95 Southwark Street London  
Living Accommodation The Doggetts Blackfriars Road  
Living Accommodation 22 Great Suffolk Street London  
Living Accommodation 47 Colombo Street London  
Living Accommodation 76 Colombo Street London  
Third Floor 5-13 Great Suffolk Street London  
Excluding Third Floor And Fourth Floor 5-13 Great Suffolk Street London  
Unit 11A Blue Fin Building 110 Southwark Street  
First Floor 99 Southwark Street London  
Second Floor 99 Southwark Street London  
Third Floor 99 Southwark Street London  
Mad Hatter Hotel 3-7 Stamford Street London  
Unit 15 100 Southwark Street London  
Eleventh Floor South Wing Sea Containers House 18 Upper Ground  
Living Accommodation 24 Blackfriars Road London  
Flat 5 31 Dolben Street London  
39 Bear Lane London SE1 0UH  
Flat 4 31 Dolben Street London  
Flat 1 31 Dolben Street London  
Flat 2 31 Dolben Street London  
Flat 3 31 Dolben Street London  
Basement Store East Rear 128 Southwark Street London  
Third Floor 81 Southwark Street London  
Part Second Floor North Europoint House 5 Lavington Street  
Part Second Floor South Europoint House 5 Lavington Street  
Annexe Part First Floor Friars Bridge Court 41-45 Blackfriars Road  
Management Office Part Ground Floor Friars Bridge Court 41-45 Blackfriars Road  
Part First Floor East Friars Bridge Court 41-45 Blackfriars Road  
Former Bin Store Part Ground Floor Friars Bridge Court 41-45 Blackfriars Road  
Large Store Part Basement Friars Bridge Court 41-45 Blackfriars Road  
36 Ludgate House 245 Blackfriars Road London  
Unit C 242 Blackfriars Road London  
3 Robinson Road London SE1 8BU  
Ross House 144 Southwark Street London  
Basement Level Two Blue Fin Building 110 Southwark Street  
Cafe Des Amis 1 Blackfriars Road London  
33 Stamford Street London SE1 9PY  
PG 68 6 Paris Garden London  
PG 69 6 Paris Garden London  
PG 70 6 Paris Garden London  
PG 67 6 Paris Garden London  
PG 64 6 Paris Garden London  
507 Block D 5 Sumner Street London  
Level 1 Tate Modern Sumner Street  
85-89 Southwark Street London SE1 0HX  
Fourth Floor 81 Southwark Street London

Fifth Floor 81 Southwark Street London  
906 Block D 5 Sumner Street London  
PG 0 6 Paris Garden London  
607 Block D 5 Sumner Street London  
905 Block D 5 Sumner Street London  
Ground Floor Block D 5 Sumner Street  
Unit A Block C 70 Holland Street  
Unit 1 240 Blackfriars Road London  
15-25 Paris Garden London SE1 8DL  
207 Bankside Lofts 65 Hopton Street London  
208 Bankside Lofts 65 Hopton Street London  
209 Bankside Lofts 65 Hopton Street London  
206 Bankside Lofts 65 Hopton Street London  
203 Bankside Lofts 65 Hopton Street London  
204 Bankside Lofts 65 Hopton Street London  
205 Bankside Lofts 65 Hopton Street London  
214 Bankside Lofts 65 Hopton Street London  
215 Bankside Lofts 65 Hopton Street London  
301 Bankside Lofts 65 Hopton Street London  
16 Hoptons Gardens Hopton Street London  
13 Hoptons Gardens Hopton Street London  
14 Hoptons Gardens Hopton Street London  
15 Hoptons Gardens Hopton Street London  
4 Hoptons Gardens Hopton Street London  
5 Hoptons Gardens Hopton Street London  
6 Hoptons Gardens Hopton Street London  
3 Hoptons Gardens Hopton Street London  
2 Hoptons Gardens Hopton Street London  
20 Hoptons Gardens Hopton Street London  
21 Hoptons Gardens Hopton Street London  
Unit 4 Ground Floor 5-11 Lavington Street London  
Units 13 And 14 Ground Floor 5-11 Lavington Street London  
Unit 15 Ground Floor 5-11 Lavington Street London  
Unit 16 Ground Floor 5-11 Lavington Street London  
Unit 10 First Floor 5-11 Lavington Street London  
Unit 5 Lower Ground 5-11 Lavington Street London  
Unit 6 Ground Floor 5-11 Lavington Street London  
Unit 6 Lower Ground 5-11 Lavington Street London  
Unit 3 Ground Floor 5-11 Lavington Street London  
Railway Arch 8 To 8A Chancel Street London  
18 Dolben Street London SE1 0UQ  
404 Bankside Lofts 65 Hopton Street London  
413 Bankside Lofts 65 Hopton Street London  
414 Bankside Lofts 65 Hopton Street London  
415 Bankside Lofts 65 Hopton Street London  
412 Bankside Lofts 65 Hopton Street London  
409 Bankside Lofts 65 Hopton Street London  
410 Bankside Lofts 65 Hopton Street London  
411 Bankside Lofts 65 Hopton Street London  
401 Bankside Lofts 65 Hopton Street London  
306 Bankside Lofts 65 Hopton Street London  
307 Bankside Lofts 65 Hopton Street London  
603 Bankside Lofts 65 Hopton Street London  
604 Bankside Lofts 65 Hopton Street London  
605 Bankside Lofts 65 Hopton Street London  
601-602 Bankside Lofts 65 Hopton Street London  
511 Bankside Lofts 65 Hopton Street London  
512 Bankside Lofts 65 Hopton Street London

513 Bankside Lofts 65 Hopton Street London  
12 Hoptons Gardens Hopton Street London  
Flat 19 River Court Upper Ground  
Flat 2 River Court Upper Ground  
Flat 20 River Court Upper Ground  
Flat 18 River Court Upper Ground  
Flat 15 River Court Upper Ground  
Flat 54 River Court Upper Ground  
Flat 55 River Court Upper Ground  
Flat 52 River Court Upper Ground  
Flat 5 River Court Upper Ground  
Flat 50 River Court Upper Ground  
Flat 51 River Court Upper Ground  
Flat 42 River Court Upper Ground  
Flat 32 River Court Upper Ground  
Flat 34 River Court Upper Ground  
Flat 35 River Court Upper Ground  
Flat 31 River Court Upper Ground  
Flat 29 River Court Upper Ground  
Flat 37 Edward Edwards House Nicholson Street  
Flat 33 Edward Edwards House Nicholson Street  
Flat 35 Edward Edwards House Nicholson Street  
Flat 36 Edward Edwards House Nicholson Street  
Flat 9 Edward Edwards House Nicholson Street  
14 Great Suffolk Street London SE1 0UG  
Flat A Christchurch House 4 Chancel Street  
Flat 8 Edward Edwards House Nicholson Street  
Flat 5 Edward Edwards House Nicholson Street  
Flat 6 Edward Edwards House Nicholson Street  
Flat 7 Edward Edwards House Nicholson Street  
21 Friars Close Bear Lane London  
22 Friars Close Bear Lane London  
Flat 22 Quadrant House 15 Burrell Street  
Flat 23 Quadrant House 15 Burrell Street  
Flat 31 Quadrant House 15 Burrell Street  
Flat 32 Quadrant House 15 Burrell Street  
Flat 33 Quadrant House 15 Burrell Street  
Flat 30 Quadrant House 15 Burrell Street  
Flat 28 Quadrant House 15 Burrell Street  
Flat 29 Quadrant House 15 Burrell Street  
Flat 3 Quadrant House 15 Burrell Street  
Flat 20 Quadrant House 15 Burrell Street  
Flat 11 Quadrant House 15 Burrell Street  
Flat 12 Quadrant House 15 Burrell Street  
Flat 13 Quadrant House 15 Burrell Street  
Flat 10 Quadrant House 15 Burrell Street  
Flat 12 Rennie Court 11 Upper Ground  
Flat 21 Rennie Court 11 Upper Ground  
Flat 22 Rennie Court 11 Upper Ground  
Flat 23 Rennie Court 11 Upper Ground  
Flat 20 Rennie Court 11 Upper Ground  
Flat 18 Rennie Court 11 Upper Ground  
Flat 19 Rennie Court 11 Upper Ground  
Flat 2 Rennie Court 11 Upper Ground  
Flat 38 Rennie Court 11 Upper Ground  
Flat 56 Rennie Court 11 Upper Ground  
Flat 57 Rennie Court 11 Upper Ground  
Flat 58 Rennie Court 11 Upper Ground

Flat 55 Rennie Court 11 Upper Ground  
Flat 52 Rennie Court 11 Upper Ground  
19 Hatfields London SE1 8DJ  
19-23 Blackfriars Road London SE1 8ER  
Franciscan Court 16 Hatfields London  
5-7 Bear Lane London SE1 0UH  
Railway Arch 9 Chancel Street London  
Railway Arch 10 Chancel Street London  
113 Southwark Street London SE1 0JF  
13 Bear Lane London SE1 0UH  
9-11 Bear Lane London SE1 0UH  
6 Burrell Street London SE1 0UN  
Railway Arches Southwark Street London  
20 Great Suffolk Street London SE1 0UG  
Colombo Centre 34-68 Colombo Street London  
10-11 Milroy Walk London SE1 9LW  
15 Milroy Walk London SE1 9LW  
H 79 6 Paris Garden London  
H 80 6 Paris Garden London  
H 77 6 Paris Garden London  
H 74 6 Paris Garden London  
H 75 6 Paris Garden London  
H 76 6 Paris Garden London  
PG 1 6 Paris Garden London  
PG 2 6 Paris Garden London  
PG 3 6 Paris Garden London  
H 84 6 Paris Garden London  
H 81 6 Paris Garden London  
H 82 6 Paris Garden London  
H 83 6 Paris Garden London  
PG 19 6 Paris Garden London  
H 41 6 Paris Garden London  
H 42 6 Paris Garden London  
H 43 6 Paris Garden London  
H 40 6 Paris Garden London  
H 37 6 Paris Garden London  
H 38 6 Paris Garden London  
H 39 6 Paris Garden London  
H 29 6 Paris Garden London  
H 19 6 Paris Garden London  
H 20 6 Paris Garden London  
H 21 6 Paris Garden London  
H 18 6 Paris Garden London  
H 15 6 Paris Garden London  
H 16 6 Paris Garden London  
H 17 6 Paris Garden London  
H 26 6 Paris Garden London  
H 54 6 Paris Garden London  
Part Second Floor West Friars Bridge Court 41-45 Blackfriars Road  
Part Second Floor East Friars Bridge Court 41-45 Blackfriars Road  
Fifth Floor New Kings Beam House 22 Upper Ground  
Eleventh Floor South 240 Blackfriars Road London  
Sixth Floor 240 Blackfriars Road London  
Ninth And Tenth Floors 240 Blackfriars Road London  
Eleventh Floor North 240 Blackfriars Road London  
Part Basement And Ground Floor 89 Southwark Street London  
Holiday Inn Express 101-109 Southwark Street London  
Unit 6 Rear East First Floor Europoint House 5 Lavington Street

PG 65 6 Paris Garden London  
PG 66 6 Paris Garden London  
PG 75 6 Paris Garden London  
PG 76 6 Paris Garden London  
PG 77 6 Paris Garden London  
PG 74 6 Paris Garden London  
PG 71 6 Paris Garden London  
PG 72 6 Paris Garden London  
PG 73 6 Paris Garden London  
PG 63 6 Paris Garden London  
PG 53 6 Paris Garden London  
PG 54 6 Paris Garden London  
PG 55 6 Paris Garden London  
PG 52 6 Paris Garden London  
PG 49 6 Paris Garden London  
PG 50 6 Paris Garden London  
PG 51 6 Paris Garden London  
PG 60 6 Paris Garden London  
PG 61 6 Paris Garden London  
PG 62 6 Paris Garden London  
PG 59 6 Paris Garden London  
PG 56 6 Paris Garden London  
PG 57 6 Paris Garden London  
PG 58 6 Paris Garden London  
PG 78 6 Paris Garden London  
Level 6 Tate Modern Sumner Street  
20 Upper Ground London SE1 9PD  
Flat 43A 18 Great Suffolk Street London  
Level 5 Tate Modern Sumner Street  
Level 2 Tate Modern Sumner Street  
Level 3 Tate Modern Sumner Street  
Level 4 Tate Modern Sumner Street  
18B Great Suffolk Street London SE1 0UG  
4-5 Burrell Street London SE1 0UN  
407 Block D 5 Sumner Street London  
Flat 63A 18 Great Suffolk Street London  
Flat 80A 18 Great Suffolk Street London  
702 Block C 70 Holland Street London  
903 Block C 70 Holland Street London  
905 Block C 70 Holland Street London  
1001 Block C 70 Holland Street London  
902 Block C 70 Holland Street London  
803 Block C 70 Holland Street London  
805 Block C 70 Holland Street London  
901 Block C 70 Holland Street London  
Flat 61 18 Great Suffolk Street London  
Fourth Floor Bastille Court 2 Paris Garden  
Railway Arch 13 Chancel Street London  
Eight Floor Sea Containers House 18 Upper Ground  
Unit 3 To 4 Ground Floor Europoint House 5 Lavington Street  
Blackfriars Station Hopton Street London  
Bon Voyage Blackfriars Station Hopton Street  
Flat 62 Rennie Court 11 Upper Ground  
Flat 1 45 Dolben Street London  
Managers Flat Founders Arms 52 Hopton Street  
Third Floor Flat 132 Southwark Street London  
Fourth Floor Flat 132 Southwark Street London  
Flat Above Prince William Henry 216-219 Blackfriars Road



Second Floor And Third Floor Flat 26 Blackfriars Road London  
Fourth Floor And Fifth Floor Flat 134 Southwark Street London  
Flat 5 Suthring House 220 Blackfriars Road  
15-25 Gallery Lofts 69 Hopton Street London  
101 Bankside Lofts 65 Hopton Street London  
Flat 4 Suthring House 220 Blackfriars Road  
Flat 1 Suthring House 220 Blackfriars Road  
Flat 2 Suthring House 220 Blackfriars Road  
Flat 3 Suthring House 220 Blackfriars Road  
Flat 818 Bankside House 24 Sumner Street  
Flat 73 69 Hopton Street London  
12-13 Milroy Walk London SE1 9LW  
Flat 72 69 Hopton Street London  
Flat 63 69 Hopton Street London  
Flat 64 69 Hopton Street London  
Flat 71 69 Hopton Street London  
Flat 808 Bankside House 24 Sumner Street  
Flat 816 Bankside House 24 Sumner Street  
Flat 817 Bankside House 24 Sumner Street  
Flat 807 Bankside House 24 Sumner Street  
3 Burrell Street London SE1 0UL  
Flat 2 45 Dolben Street London  
Doggetts Coat And Badge Blackfriars Bridge Blackfriars Road  
102 Bankside Lofts 65 Hopton Street London  
Flat 48 Gallery Lofts 69 Hopton Street  
Flat 38 Gallery Lofts 69 Hopton Street  
Flat 40 Gallery Lofts 69 Hopton Street  
Flat 47 Gallery Lofts 69 Hopton Street  
Railway Arch 5 Burrell Street SE1 0UL  
Part Basement Southwest Trains Friars Bridge Court 41-45 Blackfriars Road  
Sixth Floor And Seventh Floor Friars Bridge Court 41-45 Blackfriars Road  
Fourth To Seventh Floors 230 Blackfriars Road London  
Ground Floor To Third Floor 230 Blackfriars Road London  
Part Ground Floor Railtrack Friars Bridge Court 41-45 Blackfriars Road  
Flat 65 Gallery Lofts 69 Hopton Street  
213 Bankside Lofts 65 Hopton Street London  
210 Bankside Lofts 65 Hopton Street London  
211 Bankside Lofts 65 Hopton Street London  
212 Bankside Lofts 65 Hopton Street London  
202 Bankside Lofts 65 Hopton Street London  
107 Bankside Lofts 65 Hopton Street London  
108 Bankside Lofts 65 Hopton Street London  
109 Bankside Lofts 65 Hopton Street London  
106 Bankside Lofts 65 Hopton Street London  
103 Bankside Lofts 65 Hopton Street London  
104 Bankside Lofts 65 Hopton Street London  
105 Bankside Lofts 65 Hopton Street London  
114 Bankside Lofts 65 Hopton Street London  
115 Bankside Lofts 65 Hopton Street London  
201 Bankside Lofts 65 Hopton Street London  
113 Bankside Lofts 65 Hopton Street London  
110 Bankside Lofts 65 Hopton Street London  
111 Bankside Lofts 65 Hopton Street London  
112 Bankside Lofts 65 Hopton Street London  
5 Milroy Walk London SE1 9LW  
14 Milroy Walk London SE1 9LW  
54 Hopton Street London SE1 9JH  
48 Hopton Street London SE1 9JH

8 Hoptons Gardens Hopton Street London  
9 Hoptons Gardens Hopton Street London  
1 Stamford Street London SE1 9NT  
58 Hopton Street London SE1 9JH  
60-62 Hopton Street London SE1 9JH  
56 Hopton Street London SE1 9JH  
Bankside House 24 Sumner Street London  
1 Milroy Walk London SE1 9LW  
4 Milroy Walk London SE1 9LW  
7 Hoptons Gardens Hopton Street London  
17 Hoptons Gardens Hopton Street London  
18 Hoptons Gardens Hopton Street London  
19 Hoptons Gardens Hopton Street London  
Flat 29 18 Great Suffolk Street London  
Flat 30 18 Great Suffolk Street London  
Flat 27 18 Great Suffolk Street London  
18A Great Suffolk Street London SE1 0UG  
Flat 26 18 Great Suffolk Street London  
Flat 18 5B Bear Lane London  
Flat 8 5B Bear Lane London  
Flat 9 5B Bear Lane London  
Flat 10 5B Bear Lane London  
Flat 7 5B Bear Lane London  
Flat 4 5B Bear Lane London  
Flat 5 5B Bear Lane London  
67 Hopton Street London SE1 9LR  
Flat 43 69 Hopton Street London  
Flat 44 69 Hopton Street London  
Flat 45 69 Hopton Street London  
Flat 42 69 Hopton Street London  
Flat 35 69 Hopton Street London  
Flat 36 Gallery Lofts 69 Hopton Street  
Flat 41 69 Hopton Street London  
Flat 56 69 Hopton Street London  
Flat 61 69 Hopton Street London  
Flat 62 69 Hopton Street London  
Flat 54 69 Hopton Street London  
Flat 46 69 Hopton Street London  
Flat 52 69 Hopton Street London  
Flat 53 69 Hopton Street London  
Flat 34 Gallery Lofts 69 Hopton Street  
Flat 13 69 Hopton Street London  
Flat 14 69 Hopton Street London  
Flat 16 69 Hopton Street London  
Flat 12 69 Hopton Street London  
The Mad Hatter 3-7 Stamford Street London  
43 Holland Street London SE1 9JR  
Flat 11 69 Hopton Street London  
Flat 31 69 Hopton Street London  
Flat 32 69 Hopton Street London  
Flat 33 69 Hopton Street London  
Flat 24 69 Hopton Street London  
Flat 21 69 Hopton Street London  
Flat 22 69 Hopton Street London  
Flat 23 69 Hopton Street London  
Unit 4 Lower Ground 5-11 Lavington Street London  
Unit 5 Ground Floor 5-11 Lavington Street London  
Unit 5 First Floor 5-11 Lavington Street London

Unit 4 First Floor 5-11 Lavington Street London  
 Unit 3 First Floor 5-11 Lavington Street London  
 Unit 3 Lower Ground 5-11 Lavington Street London  
 Flat 40 18 Great Suffolk Street London  
 Flat 41 18 Great Suffolk Street London  
 Part Basement Restaurant Friars Bridge Court 41-45 Blackfriars Road  
 Eighth Floor Friars Bridge Court 41-45 Blackfriars Road  
 Part Ground Floor Connex Southern Eastern Friars Bridge Court 41-45 Blackfriars Road  
 Ground Floor 42-44 Dolben Street London  
 Second Floor Left South Wing Sea Containers House 18 Upper Ground  
 Second Floor Right South Wing Sea Containers House 18 Upper Ground  
 First Floor 42-44 Dolben Street London  
 Fifth Floor Friars Bridge Court 41-45 Blackfriars Road  
 Part First Floor Chadwick Court 15 Hatfields  
 Part Basement Ground Floor First Floor And Second Floor 6 Chancel Street London  
 Railway Arches 3 And 3A And 3C And 3D And 3E And 3F Burrell Street London  
 Railway Arches 6 Burrell Street SE1 0UL  
 Part Basement And Part Ground Floor Christchurch House 4 Chancel Street  
 Units 1 To 2 Lower Ground 5-11 Lavington Street London  
 Unit 2 Ground Floor 5-11 Lavington Street London  
 Unit 2 First Floor 5-11 Lavington Street London  
 Unit 1 First Floor 5-11 Lavington Street London  
 Sampson House 64 Hopton Street London  
 Unit 1 Ground Floor 5-11 Lavington Street London  
 Crane House Lavington Street London  
 Third Floor South Wing Sea Containers House 18 Upper Ground  
 Railway Arch 10 Treveris Street London  
 Ground Floor East Wing Sea Containers House 18 Upper Ground  
 Fifth Floor South Wing Sea Containers House 18 Upper Ground  
 Second Floor 81 Southwark Street London  
 Third Floor 91-93 Southwark Street London  
 First Floor 81 Southwark Street London  
 Third Floor North Wigglesworth House 69 Southwark Bridge Road  
 89 Southwark Bridge Road London SE1 0NQ  
 Wakefield House 9-11 Stamford Street London  
 23 Stamford Street London SE1 9NT  
 Second Floor 132 Southwark Street London  
 Part Ground Floor 99 Southwark Street London  
 Basement And Ground Floor 132 Southwark Street London  
 First Floor 132 Southwark Street London  
 406 Bankside Lofts 65 Hopton Street London  
 407 Bankside Lofts 65 Hopton Street London  
 408 Bankside Lofts 65 Hopton Street London  
 405 Bankside Lofts 65 Hopton Street London  
 402 Bankside Lofts 65 Hopton Street London  
 403 Bankside Lofts 65 Hopton Street London  
 5C-5D Bear Lane London SE1 0UH  
 Second Floor East Wing Blue Fin Building 110 Southwark Street  
 14 Sumner Street London SE1 9JZ  
 16 Sumner Street London SE1 9JZ  
 18 Sumner Street London SE1 9JZ  
 106 Southwark Street London SE1 0SU  
 Fourth Floor Blue Fin Building 110 Southwark Street  
 Fifth Floor To Eleventh Floor Blue Fin Building 110 Southwark Street  
 Blue Fin Building 110 Southwark Street London  
 Part Arch 5 And Arches 6 To 6B Burrell Street London  
 Part Second Floor Third Floor And Fourth 5-11 Lavington Street London  
 308 Bankside Lofts 65 Hopton Street London

305 Bankside Lofts 65 Hopton Street London  
302 Bankside Lofts 65 Hopton Street London  
303 Bankside Lofts 65 Hopton Street London  
304 Bankside Lofts 65 Hopton Street London  
313 Bankside Lofts 65 Hopton Street London  
314 Bankside Lofts 65 Hopton Street London  
315 Bankside Lofts 65 Hopton Street London  
312 Bankside Lofts 65 Hopton Street London  
309 Bankside Lofts 65 Hopton Street London  
310 Bankside Lofts 65 Hopton Street London  
311 Bankside Lofts 65 Hopton Street London  
501 Bankside Lofts 65 Hopton Street London  
804 Bankside Lofts 65 Hopton Street London  
901 Bankside Lofts 65 Hopton Street London  
902 Bankside Lofts 65 Hopton Street London  
802-803 Bankside Lofts 65 Hopton Street London  
701-801 Bankside Lofts 65 Hopton Street London  
704 Bankside Lofts 65 Hopton Street London  
705 Bankside Lofts 65 Hopton Street London  
Basement Ground Floor And First Floor 26 Blackfriars Road London  
Railway Arch 1 Invicta Plaza London  
34-40A Bear Lane London SE1 0UH  
1001 Bankside Lofts 65 Hopton Street London  
1101 Bankside Lofts 65 Hopton Street London  
7 Bear Lane London SE1 0UJ  
606-607 Bankside Lofts 65 Hopton Street London  
506-507 Bankside Lofts 65 Hopton Street London  
508 Bankside Lofts 65 Hopton Street London  
509-510 Bankside Lofts 65 Hopton Street London  
505 Bankside Lofts 65 Hopton Street London  
502 Bankside Lofts 65 Hopton Street London  
503 Bankside Lofts 65 Hopton Street London  
504 Bankside Lofts 65 Hopton Street London  
Apartment 1805 55 Upper Ground London  
Apartment 1806 55 Upper Ground London  
Apartment 1807 55 Upper Ground London  
Apartment 1804 55 Upper Ground London  
Apartment 1801 55 Upper Ground London  
Apartment 1802 55 Upper Ground London  
Apartment 1803 55 Upper Ground London  
Apartment 1902 55 Upper Ground London  
Apartment 1903 55 Upper Ground London  
Apartment 1904 55 Upper Ground London  
Apartment 1901 55 Upper Ground London  
Apartment 1808 55 Upper Ground London  
Flat 16 River Court Upper Ground  
Flat 17 River Court Upper Ground  
Flat 25 River Court Upper Ground  
Flat 26 River Court Upper Ground  
Flat 27 River Court Upper Ground  
Flat 24 River Court Upper Ground  
Flat 21 River Court Upper Ground  
Flat 22 River Court Upper Ground  
Flat 23 River Court Upper Ground  
Flat 14 River Court Upper Ground  
Flat 83 River Court Upper Ground  
Flat 84 River Court Upper Ground  
Flat 85 River Court Upper Ground

Flat 82 River Court Upper Ground  
Flat 79 River Court Upper Ground  
Flat 80 River Court Upper Ground  
Flat 81 River Court Upper Ground  
Flat 11 River Court Upper Ground  
Flat 12 River Court Upper Ground  
Flat 13 River Court Upper Ground  
Flat 10 River Court Upper Ground  
Flat 86 River Court Upper Ground  
Flat 87 River Court Upper Ground  
Flat 1 River Court Upper Ground  
Flat 28 River Court Upper Ground  
Flat 47 River Court Upper Ground  
Flat 48 River Court Upper Ground  
Flat 49 River Court Upper Ground  
Flat 46 River Court Upper Ground  
Flat 43 River Court Upper Ground  
Flat 44 River Court Upper Ground  
Flat 45 River Court Upper Ground  
Flat 53 River Court Upper Ground  
Apartment 9 235 Blackfriars Road London  
Apartment 10 235 Blackfriars Road London  
Fifth Floor Ludgate House 245 Blackfriars Road  
124 Southwark Street London SE1 0SW  
Unit 1 Block B 60 Holland Street  
Mondrian Sea Containers House 18 Upper Ground  
Apartment 1101 55 Upper Ground London  
Apartment 1210 55 Upper Ground London  
Apartment 1211 55 Upper Ground London  
Apartment 1301 55 Upper Ground London  
Apartment 1209 55 Upper Ground London  
Apartment 1206 55 Upper Ground London  
Apartment 1207 55 Upper Ground London  
Flat 3 River Court Upper Ground  
Flat 30 River Court Upper Ground  
Flat 4 River Court Upper Ground  
Flat 40 River Court Upper Ground  
Flat 41 River Court Upper Ground  
Flat 39 River Court Upper Ground  
Flat 36 River Court Upper Ground  
Flat 37 River Court Upper Ground  
Flat 38 River Court Upper Ground  
Flat 82 Rennie Court 11 Upper Ground  
Flat 83 Rennie Court 11 Upper Ground  
Flat 84 Rennie Court 11 Upper Ground  
Flat 81 Rennie Court 11 Upper Ground  
Flat 78 Rennie Court 11 Upper Ground  
Flat 79 Rennie Court 11 Upper Ground  
Flat 80 Rennie Court 11 Upper Ground  
Flat 89 Rennie Court 11 Upper Ground  
Flat 90 Rennie Court 11 Upper Ground  
Flat 91 Rennie Court 11 Upper Ground  
Flat 88 Rennie Court 11 Upper Ground  
Flat 85 Rennie Court 11 Upper Ground  
Flat 86 Rennie Court 11 Upper Ground  
Flat 87 Rennie Court 11 Upper Ground  
Flat 77 Rennie Court 11 Upper Ground  
Flat 67 Rennie Court 11 Upper Ground

Flat 68 Rennie Court 11 Upper Ground  
Flat 69 Rennie Court 11 Upper Ground  
Flat 66 Rennie Court 11 Upper Ground  
Flat 63 Rennie Court 11 Upper Ground  
Flat 64 Rennie Court 11 Upper Ground  
Flat 65 Rennie Court 11 Upper Ground  
Flat 74 Rennie Court 11 Upper Ground  
Flat 75 Rennie Court 11 Upper Ground  
Flat 76 Rennie Court 11 Upper Ground  
Apartment 3204 55 Upper Ground London  
Apartment 3205 55 Upper Ground London  
Apartment 3206 55 Upper Ground London  
Apartment 3102 55 Upper Ground London  
Apartment 2904 55 Upper Ground London  
Apartment 2905 55 Upper Ground London  
Apartment 2906 55 Upper Ground London  
Apartment 2903 55 Upper Ground London  
Apartment 2806 55 Upper Ground London  
Apartment 2901 55 Upper Ground London  
Apartment 2902 55 Upper Ground London  
Apartment 3005 55 Upper Ground London  
23 Friars Close Bear Lane London  
20 Friars Close Bear Lane London  
18 Friars Close Bear Lane London  
19 Friars Close Bear Lane London  
2 Friars Close Bear Lane London  
4 Friars Close Bear Lane London  
5 Friars Close Bear Lane London  
6 Friars Close Bear Lane London  
3 Friars Close Bear Lane London  
24 Friars Close Bear Lane London  
25 Friars Close Bear Lane London  
26 Friars Close Bear Lane London  
17 Friars Close Bear Lane London  
Flat 8 Holmwood Buildings 97A Southwark Street  
Flat 9 Holmwood Buildings 97 Southwark Street  
1 Friars Close Bear Lane London  
Flat 7 Holmwood Buildings 97A Southwark Street  
Flat 4 Holmwood Buildings 97A Southwark Street  
Flat 5 Holmwood Buildings 97 Southwark Street  
Flat 6 Holmwood Buildings 97 Southwark Street  
14 Friars Close Bear Lane London  
15 Friars Close Bear Lane London  
16 Friars Close Bear Lane London  
13 Friars Close Bear Lane London  
10 Friars Close Bear Lane London  
11 Friars Close Bear Lane London  
12 Friars Close Bear Lane London  
7 Friars Close Bear Lane London  
Flat 25 Quadrant House 15 Burrell Street  
Flat 26 Quadrant House 15 Burrell Street  
Flat 27 Quadrant House 15 Burrell Street  
Flat 24 Quadrant House 15 Burrell Street  
Flat 21 Quadrant House 15 Burrell Street  
30 Falcon Point Hopton Street London  
31 Falcon Point Hopton Street London  
22 Falcon Point Hopton Street London  
13 Falcon Point Hopton Street London

14 Falcon Point Hopton Street London  
15 Falcon Point Hopton Street London  
12 Falcon Point Hopton Street London  
1 Falcon Point Hopton Street London  
10 Falcon Point Hopton Street London  
11 Falcon Point Hopton Street London  
2 Falcon Point Hopton Street London  
20 Falcon Point Hopton Street London  
21 Falcon Point Hopton Street London  
19 Falcon Point Hopton Street London  
8 Friars Close Bear Lane London  
9 Friars Close Bear Lane London  
Flat 1 Quadrant House 15 Burrell Street  
Flat 18 Quadrant House 15 Burrell Street  
Flat 19 Quadrant House 15 Burrell Street  
Flat 2 Quadrant House 15 Burrell Street  
Flat 17 Quadrant House 15 Burrell Street  
Flat 14 Quadrant House 15 Burrell Street  
Flat 15 Quadrant House 15 Burrell Street  
Flat 16 Quadrant House 15 Burrell Street  
Flat 29 Rennie Court 11 Upper Ground  
Flat 3 Rennie Court 11 Upper Ground  
Flat 30 Rennie Court 11 Upper Ground  
Flat 28 Rennie Court 11 Upper Ground  
Flat 25 Rennie Court 11 Upper Ground  
Flat 26 Rennie Court 11 Upper Ground  
Flat 27 Rennie Court 11 Upper Ground  
Flat 35 Rennie Court 11 Upper Ground  
Flat 36 Rennie Court 11 Upper Ground  
Flat 37 Rennie Court 11 Upper Ground  
Flat 34 Rennie Court 11 Upper Ground  
Flat 31 Rennie Court 11 Upper Ground  
Flat 32 Rennie Court 11 Upper Ground  
Flat 33 Rennie Court 11 Upper Ground  
Flat 24 Rennie Court 11 Upper Ground  
Flat 14 Rennie Court 11 Upper Ground  
Flat 15 Rennie Court 11 Upper Ground  
Flat 16 Rennie Court 11 Upper Ground  
Flat 13 Rennie Court 11 Upper Ground  
Flat 10 Rennie Court 11 Upper Ground  
Flat 11 Rennie Court 11 Upper Ground  
60 Falcon Point Hopton Street London  
61 Falcon Point Hopton Street London  
62 Falcon Point Hopton Street London  
59 Falcon Point Hopton Street London  
110 Falcon Point Hopton Street London  
57 Falcon Point Hopton Street London  
58 Falcon Point Hopton Street London  
67 Falcon Point Hopton Street London  
68 Falcon Point Hopton Street London  
69 Falcon Point Hopton Street London  
66 Falcon Point Hopton Street London  
63 Falcon Point Hopton Street London  
64 Falcon Point Hopton Street London  
65 Falcon Point Hopton Street London  
109 Falcon Point Hopton Street London  
Flat 53 Rennie Court 11 Upper Ground  
Flat 54 Rennie Court 11 Upper Ground

Flat 9 Rennie Court 11 Upper Ground  
Flat 60 Rennie Court 11 Upper Ground  
Flat 61 Rennie Court 11 Upper Ground  
Flat 8 Rennie Court 11 Upper Ground  
Flat 59 Rennie Court 11 Upper Ground  
Flat 6 Rennie Court 11 Upper Ground  
Flat 7 Rennie Court 11 Upper Ground  
Flat 51 Rennie Court 11 Upper Ground  
Flat 42 Rennie Court 11 Upper Ground  
Flat 43 Rennie Court 11 Upper Ground  
Flat 44 Rennie Court 11 Upper Ground  
Flat 41 Rennie Court 11 Upper Ground  
Flat 39 Rennie Court 11 Upper Ground  
Flat 4 Rennie Court 11 Upper Ground  
Flat 40 Rennie Court 11 Upper Ground  
Flat 49 Rennie Court 11 Upper Ground  
Flat 5 Rennie Court 11 Upper Ground  
Flat 50 Rennie Court 11 Upper Ground  
Flat 48 Rennie Court 11 Upper Ground  
Flat 45 Rennie Court 11 Upper Ground  
Flat 46 Rennie Court 11 Upper Ground  
Flat 47 Rennie Court 11 Upper Ground  
49 Colombo Street London SE1 8DP  
Dominican Court 17 Hatfields London  
34 Blackfriars Road London SE1 8NZ  
Wedge House 36 Blackfriars Road London  
142A Southwark Street London SE1 0SW  
1 Paris Garden London SE1 8NU  
25 Blackfriars Road London SE1 8NY  
27 Blackfriars Road SE1 8NY  
77 Falcon Point Hopton Street London  
74 Falcon Point Hopton Street London  
71 Falcon Point Hopton Street London  
72 Falcon Point Hopton Street London  
73 Falcon Point Hopton Street London  
82 Falcon Point Hopton Street London  
83 Falcon Point Hopton Street London  
84 Falcon Point Hopton Street London  
81 Falcon Point Hopton Street London  
78 Falcon Point Hopton Street London  
79 Falcon Point Hopton Street London  
80 Falcon Point Hopton Street London  
H 14 6 Paris Garden London  
405 Block B 60 Holland Street London  
501 Block B 60 Holland Street London  
2 Milroy Walk London SE1 9LW  
Founders Arms 52 Hopton Street London  
50 Hopton Street London SE1 9JH  
25 Stamford Street London SE1 9NT  
242 Blackfriars Road London SE1 9UF  
Flat 1 Rennie Court 11 Upper Ground  
9 Milroy Walk London SE1 9LW  
3 Milroy Walk London SE1 9LW  
6 Milroy Walk London SE1 9LW  
7 Milroy Walk London SE1 9LW  
24 Blackfriars Road London SE1 8NY  
45 Colombo Street London SE1 8EE  
Rose And Crown 47 Colombo Street London



76 Colombo Street London  
22 Stamford Street London SE1 9LJ  
Kings Reach Tower Stamford Street London  
Sixth Floor Sea Containers House 18 Upper Ground  
216-219 Blackfriars Road London SE1 8NL  
Flat 3 Holmwood Buildings 97A Southwark Street  
PG 9 6 Paris Garden London  
PG 10 6 Paris Garden London  
PG 11 6 Paris Garden London  
PG 8 6 Paris Garden London  
PG 5 6 Paris Garden London  
PG 6 6 Paris Garden London  
PG 7 6 Paris Garden London  
PG 16 6 Paris Garden London  
PG 17 6 Paris Garden London  
PG 18 6 Paris Garden London  
PG 15 6 Paris Garden London  
PG 12 6 Paris Garden London  
PG 13 6 Paris Garden London  
PG 14 6 Paris Garden London  
PG 4 6 Paris Garden London  
H 78 6 Paris Garden London  
1103 Block B 60 Holland Street London  
1104 Block B 60 Holland Street London  
1402 Block B 60 Holland Street London  
1403 Block B 60 Holland Street London  
1501 Block B 60 Holland Street London  
1401 Block B 60 Holland Street London  
1301 Block B 60 Holland Street London  
1302 Block B 60 Holland Street London  
1303 Block B 60 Holland Street London  
1101 Block B 60 Holland Street London  
803 Block B 60 Holland Street London  
805 Block B 60 Holland Street London  
901 Block B 60 Holland Street London  
802 Block B 60 Holland Street London  
PG 39 6 Paris Garden London  
PG 40 6 Paris Garden London  
PG 41 6 Paris Garden London  
PG 38 6 Paris Garden London  
PG 35 6 Paris Garden London  
PG 36 6 Paris Garden London  
PG 37 6 Paris Garden London  
PG 46 6 Paris Garden London  
PG 47 6 Paris Garden London  
PG 48 6 Paris Garden London  
PG 45 6 Paris Garden London  
PG 42 6 Paris Garden London  
PG 43 6 Paris Garden London  
PG 44 6 Paris Garden London  
PG 34 6 Paris Garden London  
PG 24 6 Paris Garden London  
PG 25 6 Paris Garden London  
PG 26 6 Paris Garden London  
PG 23 6 Paris Garden London  
PG 20 6 Paris Garden London  
PG 21 6 Paris Garden London  
PG 22 6 Paris Garden London

PG 31 6 Paris Garden London  
PG 32 6 Paris Garden London  
PG 33 6 Paris Garden London  
PG 30 6 Paris Garden London  
PG 27 6 Paris Garden London  
PG 28 6 Paris Garden London  
PG 29 6 Paris Garden London  
H 34 6 Paris Garden London  
H 35 6 Paris Garden London  
H 36 6 Paris Garden London  
H 33 6 Paris Garden London  
H 30 6 Paris Garden London  
H 31 6 Paris Garden London  
H 32 6 Paris Garden London  
Flat 74 18 Great Suffolk Street London  
Flat 75 18 Great Suffolk Street London  
Flat 72 18 Great Suffolk Street London  
Flat 69 18 Great Suffolk Street London  
Flat 70 18 Great Suffolk Street London  
Flat 71 18 Great Suffolk Street London  
Living Accommodation 25 Stamford Street London  
603 Block A 50 Holland Street London  
701 Block A 50 Holland Street London  
702 Block A 50 Holland Street London  
602 Block A 50 Holland Street London  
502 Block A 50 Holland Street London  
503 Block A 50 Holland Street London  
H 27 6 Paris Garden London  
H 28 6 Paris Garden London  
H 25 6 Paris Garden London  
H 22 6 Paris Garden London  
H 23 6 Paris Garden London  
H 24 6 Paris Garden London  
H 44 6 Paris Garden London  
H 64 6 Paris Garden London  
H 65 6 Paris Garden London  
H 66 6 Paris Garden London  
H 63 6 Paris Garden London  
H 60 6 Paris Garden London  
H 61 6 Paris Garden London  
H 62 6 Paris Garden London  
H 71 6 Paris Garden London  
H 72 6 Paris Garden London  
H 73 6 Paris Garden London  
H 70 6 Paris Garden London  
H 67 6 Paris Garden London  
H 68 6 Paris Garden London  
H 69 6 Paris Garden London  
H 59 6 Paris Garden London  
H 49 6 Paris Garden London  
H 50 6 Paris Garden London  
H 51 6 Paris Garden London  
H 48 6 Paris Garden London  
H 45 6 Paris Garden London  
H 46 6 Paris Garden London  
H 47 6 Paris Garden London  
H 56 6 Paris Garden London  
H 57 6 Paris Garden London

H 58 6 Paris Garden London  
H 55 6 Paris Garden London  
H 52 6 Paris Garden London  
H 53 6 Paris Garden London  
1703 Block C 70 Holland Street London  
1501 Block C 70 Holland Street London  
1502 Block C 70 Holland Street London  
1503 Block C 70 Holland Street London  
1405 Block C 70 Holland Street London  
1401 Block C 70 Holland Street London  
1402 Block C 70 Holland Street London  
1403 Block C 70 Holland Street London  
1605 Block C 70 Holland Street London  
1701 Block C 70 Holland Street London  
1702 Block C 70 Holland Street London  
1603 Block C 70 Holland Street London  
1505 Block C 70 Holland Street London  
1601 Block C 70 Holland Street London  
Third To Fifth Floors 118 Southwark Street London  
Eighth Floor New Kings Beam House 22 Upper Ground  
First Floor 118 Southwark Street London  
Second Floor 118 Southwark Street London  
Fourth To Fifth Floors 240 Blackfriars Road London  
Fourth Floor 136 Southwark Street London  
805 Block D 5 Sumner Street London  
705 Block D 5 Sumner Street London  
Third Floor 136 Southwark Street London  
Riskiq New Kings Beam House 22 Upper Ground  
Second Floor 136 Southwark Street London  
Third Floor Dominican Court 17 Hatfields  
Pro Insight Colombo Centre 34-68 Colombo Street  
First To Third Floors 240 Blackfriars Road London  
Second Floor Dominican Court 17 Hatfields  
706 Block D 5 Sumner Street London  
806 Block D 5 Sumner Street London  
Basement Ground And First Floors Dominican Court 17 Hatfields  
Flat 1 Holmwood Buildings 97 Southwark Street  
Flat 10 Holmwood Buildings 97 Southwark Street  
115 Southwark Street London SE1 0JF  
142 Southwark Street London SE1 0SW  
Flat 15 Holmwood Buildings 97A Southwark Street  
Flat 16 Holmwood Buildings 97A Southwark Street  
Flat 2 Holmwood Buildings 97 Southwark Street  
Flat 14 Holmwood Buildings 97 Southwark Street  
Flat 11 Holmwood Buildings 97A Southwark Street  
Flat 12 Holmwood Buildings 97A Southwark Street  
Flat 13 Holmwood Buildings 97 Southwark Street  
Unit 1 242 Blackfriars Road London  
Unit 2 242 Blackfriars Road London  
Sixth Floor New Kings Beam House 22 Upper Ground  
First Floor Flat 134 Southwark Street London  
305 Block C 70 Holland Street London  
302 Block C 70 Holland Street London  
303 Block C 70 Holland Street London  
306 Block C 70 Holland Street London  
505 Block C 70 Holland Street London  
601 Block C 70 Holland Street London  
602 Block C 70 Holland Street London

503 Block C 70 Holland Street London  
405 Block C 70 Holland Street London  
501 Block C 70 Holland Street London  
502 Block C 70 Holland Street London  
301 Block C 70 Holland Street London  
Flat 23 Edward Edwards House Nicholson Street  
Flat 24 Edward Edwards House Nicholson Street  
Flat 25 Edward Edwards House Nicholson Street  
Flat 22 Edward Edwards House Nicholson Street  
Flat 18 Edward Edwards House Nicholson Street  
Flat 19 Edward Edwards House Nicholson Street  
Flat 21 Edward Edwards House Nicholson Street  
Flat 3 Edward Edwards House Nicholson Street  
Flat 30 Edward Edwards House Nicholson Street  
Flat 31 Edward Edwards House Nicholson Street  
Flat 29 Edward Edwards House Nicholson Street  
Flat 26 Edward Edwards House Nicholson Street  
Flat 27 Edward Edwards House Nicholson Street  
Flat 28 Edward Edwards House Nicholson Street  
Flat 16 Edward Edwards House Nicholson Street  
Flat 5 Quadrant House 15 Burrell Street  
Flat 6 Quadrant House 15 Burrell Street  
Flat 7 Quadrant House 15 Burrell Street  
Flat 4 Quadrant House 15 Burrell Street  
Flat 34 Quadrant House 15 Burrell Street  
Flat 35 Quadrant House 15 Burrell Street  
Flat 36 Quadrant House 15 Burrell Street  
Flat 12 Edward Edwards House Nicholson Street  
Flat 13 Edward Edwards House Nicholson Street  
Flat 15 Edward Edwards House Nicholson Street  
Flat 10 Edward Edwards House Nicholson Street  
Flat 8 Quadrant House 15 Burrell Street  
Flat 9 Quadrant House 15 Burrell Street  
Flat 1 Edward Edwards House Nicholson Street  
Flat 32 Edward Edwards House Nicholson Street  
111 Southwark Street London SE1 0JF  
1 Burrell Street London SE1 0UL  
22 Great Suffolk Street London SE1 0UG  
Flat C Christchurch House 4 Chancel Street  
Flat D Christchurch House 4 Chancel Street  
Flat E Christchurch House 4 Chancel Street  
36 Bear Lane London SE1 0UH  
7 Burrell Street London SE1 0UN  
134 Southwark Street London SE1 0SW  
Flat B Christchurch House 4 Chancel Street  
Flat 38 Edward Edwards House Nicholson Street  
Flat 39 Edward Edwards House Nicholson Street  
Flat 4 Edward Edwards House Nicholson Street  
Flat 73 Rennie Court 11 Upper Ground  
Flat 70 Rennie Court 11 Upper Ground  
Flat 71 Rennie Court 11 Upper Ground  
Flat 72 Rennie Court 11 Upper Ground  
Flat 92 Rennie Court 11 Upper Ground  
Flat 69 River Court Upper Ground  
Flat 70 River Court Upper Ground  
Flat 71 River Court Upper Ground  
Flat 68 River Court Upper Ground  
Flat 65 River Court Upper Ground

Flat 66 River Court Upper Ground  
Flat 67 River Court Upper Ground  
Flat 76 River Court Upper Ground  
Flat 77 River Court Upper Ground  
Flat 78 River Court Upper Ground  
Flat 75 River Court Upper Ground  
Flat 72 River Court Upper Ground  
Flat 73 River Court Upper Ground  
Flat 74 River Court Upper Ground  
Flat 64 River Court Upper Ground  
Flat 97 Rennie Court 11 Upper Ground  
Flat 98 Rennie Court 11 Upper Ground  
Flat 99 Rennie Court 11 Upper Ground  
Flat 96 Rennie Court 11 Upper Ground  
Flat 93 Rennie Court 11 Upper Ground  
Flat 94 Rennie Court 11 Upper Ground  
Flat 95 Rennie Court 11 Upper Ground  
Flat 61 River Court Upper Ground  
Flat 62 River Court Upper Ground  
Flat 63 River Court Upper Ground  
Flat 60 River Court Upper Ground  
Flat 57 River Court Upper Ground  
Flat 58 River Court Upper Ground  
Flat 59 River Court Upper Ground  
27 Falcon Point Hopton Street London  
28 Falcon Point Hopton Street London  
29 Falcon Point Hopton Street London  
26 Falcon Point Hopton Street London  
23 Falcon Point Hopton Street London  
24 Falcon Point Hopton Street London  
25 Falcon Point Hopton Street London  
33 Falcon Point Hopton Street London  
34 Falcon Point Hopton Street London  
35 Falcon Point Hopton Street London  
32 Falcon Point Hopton Street London  
3 Falcon Point Hopton Street London  
Apartment 2202 55 Upper Ground London  
Apartment 2203 55 Upper Ground London  
Apartment 2204 55 Upper Ground London  
Apartment 2201 55 Upper Ground London  
Apartment 2104 55 Upper Ground London  
Apartment 2105 55 Upper Ground London  
Apartment 2106 55 Upper Ground London  
Apartment 2303 55 Upper Ground London  
Apartment 2304 55 Upper Ground London  
Apartment 2305 55 Upper Ground London  
Apartment 2302 55 Upper Ground London  
Apartment 2205 55 Upper Ground London  
Apartment 2206 55 Upper Ground London  
Apartment 2301 55 Upper Ground London  
Apartment 2103 55 Upper Ground London  
Apartment 1909 55 Upper Ground London  
Apartment 1910 55 Upper Ground London  
Apartment 2001 55 Upper Ground London  
Apartment 1908 55 Upper Ground London  
Apartment 1905 55 Upper Ground London  
Apartment 1906 55 Upper Ground London  
Apartment 1907 55 Upper Ground London

Apartment 2006 55 Upper Ground London  
Apartment 2101 55 Upper Ground London  
Apartment 2102 55 Upper Ground London  
Apartment 2005 55 Upper Ground London  
Apartment 2002 55 Upper Ground London  
Apartment 2003 55 Upper Ground London  
Apartment 2004 55 Upper Ground London  
Apartment 2306 55 Upper Ground London  
Apartment 2702 55 Upper Ground London  
Apartment 2703 55 Upper Ground London  
Apartment 2704 55 Upper Ground London  
Apartment 2701 55 Upper Ground London  
Apartment 2604 55 Upper Ground London  
Apartment 2605 55 Upper Ground London  
Apartment 2606 55 Upper Ground London  
Apartment 2803 55 Upper Ground London  
Apartment 2804 55 Upper Ground London  
Apartment 2805 55 Upper Ground London  
Apartment 2802 55 Upper Ground London  
Apartment 2705 55 Upper Ground London  
Apartment 2706 55 Upper Ground London  
Apartment 2801 55 Upper Ground London  
Apartment 2603 55 Upper Ground London  
Apartment 2405 55 Upper Ground London  
Apartment 2406 55 Upper Ground London

**Consultation responses received****Internal services**

Transport Policy

**Statutory and non-statutory organisations**

London Underground

Natural England - London & South East Re

Environment Agency

Network Rail

Environment Agency

**Neighbour and local groups consulted:**

56 Falcon Point Hopton Street London  
6 Falcon Point Hopton Street London  
41 Falcon Point Hopton Street London  
47 Falcon Point Hopton Street London  
86 Falcon Point Hopton Street London  
Flat 413 Bankside Lofts 65 Hopton Street London  
5 Falcon Point Hopton St Bankside, London  
Apartment 1101, Bankside Lofts 65 Hopton Street London  
Garden Mine Cottage Bosulow Penzance  
Flat 31 And Flat 35 69 Hopton Street London  
Bankside Lofts 65 Hopton St London  
26 Wittering Close Kingston Upon Thames KT2 5GA  
Flat 24, Gallery Lofts 69 Hopton Street London  
65 Hopton Street London  
Falcon Point Hopton Street London  
Catherine Alexandra Design, Development, Research 78 York Street London  
65 Hopton Street London  
64, 69 Hopton Street London SE1 9LF  
Flat 404 Bankside Lofts London  
Flat 16 69 Hopton St London  
Falcon Point Management Group 56 Hopton Street London  
Flat 33 Falcon Point London  
71 Gallery Lofts 69 Hopton Street London  
12 Gallery Lofts 69 Hopton Street London  
Flat 501, Bankside Lofts 65 Hopton Street London  
Flat 605 Bankside Lofts 65 Hopton St London  
34 Gallery Lofts 69 Hopton Street Southwark  
Flat 41 69 Hopton Street London  
21 Meades Lane Chesham HP5 1ND  
RBH Hospitality Management 40-50 Brand Street Glasgow  
Flat 209 Bankside Lofts 65 Hopton Street London  
501 Bankside Lofts 65 Hopton Street London  
703 Bankside Lofts 65 Hopton Street London  
53 Gallery Lofts 69 Hopton Street London  
36 Gallery Lofts 69 Hopton Street London  
Flat 36 69 Hopton Street London  
65 Hopton Street Flat 15 Gallery Lofts London  
The Lannet West Haddon Road Guilsborough  
33 Gallery Lofts 69 Hopton Street London  
B1601 Neo Bankside London SE1 9JF  
3 Peek Crescent London SW19 5ER  
Flat 302 65 Bankside Lofts London  
44 Gallery Lofts 69 Hopton Street London  
701 Bankside Lofts 65 Hopton Street London  
11 Falcon Point Hopton Street SE1 9JW  
Fieldings Chardstock Axminster  
Flat 29 Falcon Point Hopton Street London  
By -E-Mail XXXX  
27 River Court Upper Ground London  
506/507 Bankside Lofts 65 Hopton Street London  
Flat 6, Falcon Point  
Red Cross Garden 50 Red Cross Way London  
206 Bankside Lofts 65 Hopton Street London  
204 Bankside Lofts 65 Hopton Street London  
215 Bankside Lofts 65 Hopton Street London  
414 Bankside Lofts 65 Hopton Street London  
415 Bankside Lofts 65 Hopton Street London



409 Bankside Lofts 65 Hopton Street London  
306 Bankside Lofts 65 Hopton Street London  
604 Bankside Lofts 65 Hopton Street London  
511 Bankside Lofts 65 Hopton Street London  
Flat 72 69 Hopton Street London  
107 Bankside Lofts 65 Hopton Street London  
108 Bankside Lofts 65 Hopton Street London  
109 Bankside Lofts 65 Hopton Street London  
113 Bankside Lofts 65 Hopton Street London  
56 Hopton Street London SE1 9JH  
Flat 53 69 Hopton Street London  
406 Bankside Lofts 65 Hopton Street London  
407 Bankside Lofts 65 Hopton Street London  
302 Bankside Lofts 65 Hopton Street London  
506-507 Bankside Lofts 65 Hopton Street London  
508 Bankside Lofts 65 Hopton Street London  
505 Bankside Lofts 65 Hopton Street London  
504 Bankside Lofts 65 Hopton Street London  
14 Falcon Point Hopton Street London  
1 Falcon Point Hopton Street London  
11 Falcon Point Hopton Street London  
57 Falcon Point Hopton Street London  
77 Falcon Point Hopton Street London  
84 Falcon Point Hopton Street London  
35 Falcon Point Hopton Street London  
3 Falcon Point Hopton Street London

**Relevant planning history**

No relevant planning history

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**APPENDIX 4****RECOMMENDATION**

This document shows the case officer's recommended decision for the application referred to below. This document is not a decision notice for this application.

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<b>Applicant</b>	Sampson House Ltd	<b>Reg. Number</b>	18/AP/1603
<b>Application Type</b>	Major application	<b>Case Number</b>	1519-J
<b>Recommendation</b>	Major - GRANTED		

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**Draft of Decision Notice****Planning Permission was GRANTED for the following development:**

Redevelopment to create two levels of basement and the erection of five buildings ranging from seven to 34 storeys plus plant (heights ranging from 28.9m AOD to 123.9m AOD) to provide: 341 dwellings (Class C3); 8,054sqm (GIA) of office space (Class B1); 1,436sqm (GIA) of retail floorspace (Class A1-A4); 904sqm (GIA) of cultural floorspace (Class D1/D2); 16,254sqm (GIA) hotel with up to 126 rooms (Class C1); new open space; reconfigured vehicular and pedestrian access; highway works; landscaping; basement car park for 107 cars (including 29 disabled car parking spaces), plus servicing and plant areas; and works associated and ancillary to the proposed development.

The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. A hard copy of the application documents is available for inspection by prior appointment at Southwark Council's offices, 160 Tooley Street, SE1 2QH (Monday to Friday 9am to 5pm). Copies of the Non-Technical Summary are available free of charge and printed/electronic copies of the Environmental Statement can be purchased. To request a copy of the Non-Technical Summary or to purchase the ES please contact: Trium Environmental Consulting LLP, 69-85 Tabernacle Street, London EC2A 4BD or by email at [hello@triumenv.co.uk](mailto:hello@triumenv.co.uk) or Telephone: +44 (0) 203 887 7118.

Sampson House 64 Hopton Street London SE1 9JH

**In accordance with application received on 8 May 2018**

**and Applicant's Drawing Nos.:**

Existing Plans

existing

1370-A-SH-0099 R0  
 1370-A-SH-0100 R0  
 1370-A-SH-0101 R0  
 1370-A-SH-0102 R0  
 1370-A-SH-0103 R0  
 1370-A-SH-0104 R0  
 1370-A-SH-0105 R0  
 1370-A-SH-0106 R0  
 1370-A-SH-0107 R0  
 1370-A-SH-0108 R0  
 1370-A-SH-0110 R0

1370-A-SH-0150 R0  
1370-A-SH-0151 R0  
1370-A-SH-0152 R0  
1370-A-SH-0153 R0  
1370-A-SH-0160 R0  
1370-A-SH-0161 R0  
1370-A-SH-0162R R0  
1370-A-SH-0163 R0  
1370-A-SH-0170 R0  
1370-A-SH-0171 R0 received

#### Proposed Plans

##### SH9 - Floorplans

1370-A-SH9-1900 R0  
1370-A-SH9-1901 R0  
1370-A-SH9-1902 R0  
1370-A-SH9-1906 R0  
1370-A-SH9-1907 R0  
1370-A-SH9-1908 R0  
1370-A-SH9-1909 R0

#### GA Elevations

1370-A-SH-2000 R0  
1370-A-SH-2001 R0  
1370-A-SH-2002 R1  
1370-A-SH-2003 R0

#### Site Sections

1370-A-SH-2050 R0  
1370-A-SH-2051 R0  
1370-A-SH-2052 R0  
1370-A-SH-2053 R0  
1370-A-SH-2054 R0  
1370-A-SH-2055 R0  
1370-A-SH-2056 R0  
1370-A-SH-2057 R0  
1370-A-SH-2058 R0  
1370-A-SH-2100 R0

#### Proposed Building Elevations and Sections

1379-MAKE-04-XX-EL-A-P2200 R0  
1379-MAKE-04-XX-EL-A-P2201 R0  
1379-MAKE-04-XX-SE-A-P2250 R0  
1379-MAKE-04-XX-SE-A-P2251 R0  
1370-A-SH5-2500 R0  
1370-A-SH5-2501 R0  
1370-A-SH5-2550 R0  
1370-A-SH7-2700 R0  
1370-A-SH7-2701 R0  
1370-A-SH7-2750 R0  
1370-A-SH8-2800 R0  
1370-A-SH8-2850 R1  
1370-A-SH9-2900 R0  
1370-A-SH9-2950 R0

#### Façade Studies

1379-MAKE-04-XX-DT-P6021 R0

1379-MAKE-04-XX-DT-P6030 R0  
1379-MAKE-04-XX-DT-P6090 R0  
1370-A-SH-3500 R0  
1370-A-SH-3501 R0  
1370-A-SH-3700 R0  
1370-A-SH-3701 R0  
1370-A-SH-3800 R0  
1370-A-SH-3900 R0

#### Part M4 (2) and M4(3) Compliance

1370-A-SH5-4500 R0  
1370-A-SH5-4501 R0  
1370-A-SH5-4550 R0  
1370-A-SH5-4551 R0  
1370-A-SH5-4552 R0  
1370-A-SH5-4700 R0  
1370-A-SH5-4701 R0  
1370-A-SH5-4750 R0  
1370-A-SH5-4751 R0  
1370-A-SH5-4800 R0  
1370-A-SH5-4850 R0  
1370-A-SH5-4851 R0

received

#### Site Plans

1370-A-SH-SCH-0002 R0  
1370-A-SH-0010 R0  
1370-A-SH-0011 R0  
1370-A-SH-0012 R0  
1370-A-SH-0013 R0

#### Proposed GA Plans

1370-A-SH-0997 R1  
1370-A-SH-0998 R0  
1370-A-SH-0999 R0  
1370-A-SH-1000 R2  
1370-A-SH-1001 R0  
1370-A-SH-1008 R0  
1370-A-SH-1020 R0  
1370-A-SH-1033 R0

#### SH4 - Floorplans

1379-MAKE-04-00-PL-A-P2000 R1  
1379-MAKE-04-ZZ-PL-A-P2001 R0  
1379-MAKE-04-ZZ-PL-A-P2005 R0  
1379-MAKE-04-ZZ-PL-A-P2009 R0  
1379-MAKE-04-ZZ-PL-A-P2013 R0  
1379-MAKE-04-ZZ-PL-A-P2017 R0

#### SH5 - Floorplans

1370-A-SH5-1500 R0  
1370-A-SH5-1500M R0  
1370-A-SH5-1501 R0  
1370-A-SH5-1501M R0  
1370-A-SH5-1502 R0  
1370-A-SH5-1503 R0  
1370-A-SH5-1503M R0  
1370-A-SH5-1504 R0  
1370-A-SH5-1506 R0

1370-A-SH5-1512 R0  
1370-A-SH5-1514 R0  
1370-A-SH5-1515 R0  
1370-A-SH5-1516 R0  
1370-A-SH5-1517 R0  
1370-A-SH5-1518 R0  
1370-A-SH5-1520 R0  
1370-A-SH5-1521 R0  
1370-A-SH5-1522 R0  
1370-A-SH5-1525 R0  
1370-A-SH5-1526 R0  
1370-A-SH5-1529 R0  
1370-A-SH5-1530 R0  
1370-A-SH5-1531 R0  
1370-A-SH5-1532 R0

#### SH7 - Floorplans

1370-A-SH7-1700 R0  
1370-A-SH7-1701 R0  
1370-A-SH7-1702 R0  
1370-A-SH7-1703 R0  
1370-A-SH7-1704 R0  
1370-A-SH7-1708 R0  
1370-A-SH7-1709 R0  
1370-A-SH7-1710 R0  
1370-A-SH7-1712 R0  
1370-A-SH7-1714 R1  
1370-A-SH7-1716 R1  
1370-A-SH7-1719 R0  
1370-A-SH7-1720 R0  
1370-A-SH7-1722 R1  
1370-A-SH7-1724 R1  
1370-A-SH7-1726 R0  
1370-A-SH7-1728 R0  
1370-A-SH7-1730 R0  
1370-A-SH7-1731 R0

#### SH8 - Floorplans

1370-A-SH8-1800 R0  
1370-A-SH8-1800M R0  
1370-A-SH8-1801 R1  
1370-A-SH8-1802 R1  
1370-A-SH8-1805 R1  
1370-A-SH8-1806 R0  
1370-A-SH8-1807 R0  
received

#### Other Documents

Affordable Housing Statement  
Basement Impact Assessment  
Daylight and Sunlight Assessment (Ludgate)  
Daylight and Sunlight Assessment (Development Site)  
Design and Access Statement  
Drainage Strategy  
Energy Statement  
Environmental Statement (Main Report)  
Environmental Statement Volume I, II and III

Flood Risk Assessment  
 Historic Environment Assessment  
 Landscaping and Open Space Statement  
 Planning Statement  
 Statement of Community Involvement  
 Townscape, Conservation and Visual Impact Assessment  
 Transport Statement  
 Viability Report  
 Waste Management Strategy  
 received

**Time limit for implementing this permission and the approved plans**  
**Time limit for implementing this permission and the approved plans**

1. The development hereby permitted shall be begun before the end of three years from the date of this permission.

Reason:

As required by Section 91 of the Town and Country Planning Act 1990 as amended.

2. The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:

Site Plans

1370-A-SH-SCH-0002 R0  
 1370-A-SH-0010 R0  
 1370-A-SH-0011 R0  
 1370-A-SH-0012 R0  
 1370-A-SH-0013 R0

Existing

1370-A-SH-0099 R0  
 1370-A-SH-0100 R0  
 1370-A-SH-0101 R0  
 1370-A-SH-0102 R0  
 1370-A-SH-0103 R0  
 1370-A-SH-0104 R0  
 1370-A-SH-0105 R0  
 1370-A-SH-0106 R0  
 1370-A-SH-0107 R0  
 1370-A-SH-0108 R0  
 1370-A-SH-0110 R0  
 1370-A-SH-0150 R0  
 1370-A-SH-0151 R0  
 1370-A-SH-0152 R0  
 1370-A-SH-0153 R0  
 1370-A-SH-0160 R0  
 1370-A-SH-0161 R0  
 1370-A-SH-0162R R0  
 1370-A-SH-0163 R0  
 1370-A-SH-0170 R0  
 1370-A-SH-0171 R0

Proposed GA Plans

1370-A-SH-0997 R1  
1370-A-SH-0998 R0  
1370-A-SH-0999 R0  
1370-A-SH-1000 R2  
1370-A-SH-1001 R0  
1370-A-SH-1008 R0  
1370-A-SH-1020 R0  
1370-A-SH-1033 R0

#### SH4 - Floorplans

1379-MAKE-04-00-PL-A-P2000 R1  
1379-MAKE-04-ZZ-PL-A-P2001 R0  
1379-MAKE-04-ZZ-PL-A-P2005 R0  
1379-MAKE-04-ZZ-PL-A-P2009 R0  
1379-MAKE-04-ZZ-PL-A-P2013 R0  
1379-MAKE-04-ZZ-PL-A-P2017 R0

#### SH5 - Floorplans

1370-A-SH5-1500 R0  
1370-A-SH5-1500M R0  
1370-A-SH5-1501 R0  
1370-A-SH5-1501M R0  
1370-A-SH5-1502 R0  
1370-A-SH5-1503 R0  
1370-A-SH5-1503M R0  
1370-A-SH5-1504 R0  
1370-A-SH5-1506 R0  
1370-A-SH5-1512 R0  
1370-A-SH5-1514 R0  
1370-A-SH5-1515 R0  
1370-A-SH5-1516 R0  
1370-A-SH5-1517 R0  
1370-A-SH5-1518 R0  
1370-A-SH5-1520 R0  
1370-A-SH5-1521 R0  
1370-A-SH5-1522 R0  
1370-A-SH5-1525 R0  
1370-A-SH5-1526 R0  
1370-A-SH5-1529 R0  
1370-A-SH5-1530 R0  
1370-A-SH5-1531 R0  
1370-A-SH5-1532 R0

#### SH7 - Floorplans

1370-A-SH7-1700 R0  
1370-A-SH7-1701 R0  
1370-A-SH7-1702 R0  
1370-A-SH7-1703 R0  
1370-A-SH7-1704 R0  
1370-A-SH7-1708 R0  
1370-A-SH7-1709 R0  
1370-A-SH7-1710 R0  
1370-A-SH7-1712 R0  
1370-A-SH7-1714 R1  
1370-A-SH7-1716 R1  
1370-A-SH7-1719 R0  
1370-A-SH7-1720 R0  
1370-A-SH7-1722 R1



1370-A-SH7-1724 R1  
1370-A-SH7-1726 R0  
1370-A-SH7-1728 R0  
1370-A-SH7-1730 R0  
1370-A-SH7-1731 R0

#### SH8 - Floorplans

1370-A-SH8-1800 R0  
1370-A-SH8-1800M R0  
1370-A-SH8-1801 R1  
1370-A-SH8-1802 R1  
1370-A-SH8-1805 R1  
1370-A-SH8-1806 R0  
1370-A-SH8-1807 R0

#### SH9 - Floorplans

1370-A-SH9-1900 R0  
1370-A-SH9-1901 R0  
1370-A-SH9-1902 R0  
1370-A-SH9-1906 R0  
1370-A-SH9-1907 R0  
1370-A-SH9-1908 R0  
1370-A-SH9-1909 R0

#### GA Elevations

1370-A-SH-2000 R0  
1370-A-SH-2001 R0  
1370-A-SH-2002 R1  
1370-A-SH-2003 R0

#### Site Sections

1370-A-SH-2050 R0  
1370-A-SH-2051 R0  
1370-A-SH-2052 R0  
1370-A-SH-2053 R0  
1370-A-SH-2054 R0  
1370-A-SH-2055 R0  
1370-A-SH-2056 R0  
1370-A-SH-2057 R0  
1370-A-SH-2058 R0  
1370-A-SH-2100 R0

#### Proposed Building Elevations and Sections

1379-MAKE-04-XX-EL-A-P2200 R0  
1379-MAKE-04-XX-EL-A-P2201 R0  
1379-MAKE-04-XX-SE-A-P2250 R0  
1379-MAKE-04-XX-SE-A-P2251 R0  
1370-A-SH5-2500 R0  
1370-A-SH5-2501 R0  
1370-A-SH5-2550 R0  
1370-A-SH7-2700 R0  
1370-A-SH7-2701 R0  
1370-A-SH7-2750 R0  
1370-A-SH8-2800 R0  
1370-A-SH8-2850 R1  
1370-A-SH9-2900 R0  
1370-A-SH9-2950 R0

#### Façade Studies

1379-MAKE-04-XX-DT-P6021 R0  
 1379-MAKE-04-XX-DT-P6030 R0  
 1379-MAKE-04-XX-DT-P6090 R0  
 1370-A-SH-3500 R0  
 1370-A-SH-3501 R0  
 1370-A-SH-3700 R0  
 1370-A-SH-3701 R0  
 1370-A-SH-3800 R0  
 1370-A-SH-3900 R0

#### Part M4 (2) and M4(3) Compliance

1370-A-SH5-4500 R0  
 1370-A-SH5-4501 R0  
 1370-A-SH5-4550 R0  
 1370-A-SH5-4551 R0  
 1370-A-SH5-4552 R0  
 1370-A-SH5-4700 R0  
 1370-A-SH5-4701 R0  
 1370-A-SH5-4750 R0  
 1370-A-SH5-4751 R0  
 1370-A-SH5-4800 R0  
 1370-A-SH5-4850 R0  
 1370-A-SH5-4851 R0

#### Reason:

For the avoidance of doubt and in the interests of proper planning."

### **Permission is subject to the following Pre-Commencements Conditions**

3. Tree protection - foundation design  
 Before any work hereby authorised begins, details of the foundation works and podium levels to be used in the construction of this development, showing sufficient rooting space and drainage, shall be submitted to and approved in writing by the Local Planning Authority. Details shall include the use below ground rootcell type systems to provide for long term tree growth and retention. The development shall not be carried out otherwise than in accordance with any such approval given.

#### Reason

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of screening, local biodiversity and adaptation to climate change, in accordance with the NPPF 2029, London Plan 2016 Policy 2.18 Green infrastructure; Policy 5.10 Urban greening; Policy 7.4 Local character; Policy 7.21 Trees and woodlands; and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards. and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.28 Biodiversity.

4. "Prior to works commencing, full details of all proposed tree planting shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections, planting and maintenance specifications, use of guards or other protective measures and confirmation of location, species, sizes, nursery stock type, supplier and defect period. All tree planting shall be carried out in accordance with those details and at those times. Planting shall comply with BS5837: Trees in relation to demolition, design and construction (2012) and BS: 4428 Code of practice for general landscaping operations.

If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place in the first suitable planting season., unless the local planning authority gives its written consent to any variation.

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in accordance with The National Planning Policy Framework 2019 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity."

#### 5. Drainage Strategy

The development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed.

Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.

#### 6. Archaeological Mitigation

Before any work hereby authorised begins, excluding demolition to ground level only, the applicant shall secure the implementation of a programme of archaeological mitigation works in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2019.

#### 7. Contamination

Prior to the commencement of any development

a) A detailed remediation strategy to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment shall be prepared and submitted to the Local Planning Authority for approval in writing. The scheme shall ensure that the site would not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority shall be given two weeks written notification of commencement of the remediation scheme works.

b) Following the completion of the measures identified in the approved remediation strategy, a verification report providing evidence that all work required by the remediation strategy has been completed shall be submitted to and approved in writing by the Local Planning Authority.

c) In the event that contamination is found at any time when carrying out the approved

development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-c above.

**Reason**

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007), strategic policy 13' High environmental standards' of the Core Strategy (2011) and the National Planning Policy Framework 2019."

**8. Tree Planting**

Prior to works commencing, full details of all proposed tree planting shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections, planting and maintenance specifications, use of guards or other protective measures and confirmation of location, species, sizes, nursery stock type, supplier and defect period. All tree planting shall be carried out in accordance with those details and at those times. Planting shall comply with BS5837: Trees in relation to demolition, design and construction (2012) and BS: 4428 Code of practice for general landscaping operations.

If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place in the first suitable planting season., unless the local planning authority gives its written consent to any variation.

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in accordance with The National Planning Policy Framework 2019 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity."

**9. Environmental Management Plan**

No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to and approved in writing by the Local Planning Authority. The approved statement shall be adhered to throughout the construction period. The Statement shall provide for:

the parking of vehicles of site operatives and visitors;  
loading and unloading of plant and materials;  
storage of plant and materials used in constructing the development;  
the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;  
wheel washing facilities;  
measures to control the emission of dust and dirt during construction;  
a scheme for recycling / disposing of waste resulting from demolition and construction works

**Reason:**

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011) saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007), and the National Planning Policy Framework 2019.

**10. Bird boxes**

Details of bird nesting boxes shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the use hereby granted permission.

No less than 12 open fronted starling boxes and six sparrow terraces shall be provided and the details shall include the exact location, specification and design of the habitats. The boxes shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

The nesting boxes shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the nest/roost features have been installed to the agreed specification.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: 5.10 and 7.19 of the London Plan 2016, Policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core strategy.

11. Swift boxes

Details of Swift nesting boxes/bricks shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the use hereby granted permission.

No less than 24 nesting boxes/bricks shall be provided and the details shall include the exact location, specification and design of the habitats. The boxes / bricks shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

The Swift nesting boxes/bricks shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the nest/roost features have been installed to the agreed specification.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: 5.10 and 7.19 of the London Plan 2016, Policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core strategy.

**Permission is subject to the following Grade Condition(s)**

12. HARD AND SOFT LANDSCAPING

Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, surfacing materials of any parking, access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use.

The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely

damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2019; Strategic Policies 11 (Open Spaces and Wildlife), 12 (Design and conservation) and 13 (High Environmental Standards) of The Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity), 3.12 (Quality in Design) 3.13 (Urban Design) and 3.28 (Biodiversity) of the Southwark Plan 2007.

### 13. Service Management Plan

Prior to the commencement of any works above grade, a Service Management Plan detailing how all elements of the site are to be serviced (including servicing hours) has been submitted to and approved in writing by the Local Planning Authority. The plan should set out the temporary service arrangements prior to the delivery of the service entrance on Southwark Street. The development shall be carried out in accordance with the approval given and shall remain for as long as the development is occupied.

Reason

To ensure compliance with The National Planning Policy Framework 2019, Strategic Policy 2 Sustainable Transport of The Core Strategy 2011 and Saved Policy 5.2 Transport Impacts of the Southwark Plan 2007.

### 14. Green Roofs

Before any above grade work hereby authorised begins, details of the biodiversity (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity (green/brown) roof(s) shall be:

- \* biodiversity based with extensive substrate base (depth 80-150mm);
- \* laid out in accordance with agreed plans; and
- \* planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on wildflower planting, and no more than a maximum of 25% sedum coverage).

The biodiversity (green/brown) roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.

The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the green/brown roof(s) and Southwark Council agreeing the submitted plans, and once the green/brown roof(s) are completed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: Policies 2.18 (Green Infrastructure: the Multifunctional Network of Green and Open Spaces), 5.3 (Sustainable Design and Construction), 5.10 (Urban Greening) and 5.11 (Green Roofs and Development Site

Environs) of the London Plan 2016; Strategic Policy 11 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.28 (Biodiversity) of the Southwark Plan 2007.

15. Ecology Management Plan

Before any above grade work hereby authorised begins, a landscape management plan, including long- term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), shall be submitted to and approved in writing by the local planning authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

Reason:

This condition is necessary to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site. This is an mandatory criteria of BREEAM (LE5) to monitor long term impact on biodiversity a requirement is to produce a Landscape and Habitat Management Plan

16. Cycle storage

Before any above grade work hereby authorised begins, details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the cycle parking facilities provided shall be retained and the space used for no other purpose, and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with: the National Planning Policy Framework 2019; Strategic Policy 2 (Sustainable Transport) of the Core Strategy 2011, and; Saved Policy 5.3 (Walking and Cycling) of the Southwark Plan 2007.

17. Materials

Details of all external facing materials to be used in the carrying out of this permission for:

SH4  
SH5  
SH7  
SH8  
SH9

shall be presented on site and approved by the Local Planning Authority before any work in connection with this permission is carried out and the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with The National Planning Policy Framework 2019, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies: 3.12 Quality in Design and 3.13 Urban Design of The Southwark Plan 2007.

18. Design mock ups

Full-scale mock-ups of the cladding to the tall buildings including buildings:

SH4

SH5  
SH7  
SH8  
SH9

to be used in the carrying out of this permission shall be presented on site and approved in writing by the Local Planning Authority before any work above grade for the relevant building in connection with this permission is carried out; the development shall not be carried out otherwise than in accordance with any such approval given. These samples must demonstrate how the proposal makes a contextual response in terms of materials to be used.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with saved policies: Part 7 of the NPPF 2019; Policy SP12 of the Core Strategy (2011) and saved Policies 3.12 Quality in Design; 3.13 Urban Design, 3.20 Tall Buildings; of The Southwark Plan (2007).

19. Design section details

1:5/10 section detail-drawings through all buildings facades; parapets; balconies; heads, cills and jambs of all openings; entrance lobbies; viaduct shop frontages; the new public lifts; and roof edges to be used in the carrying out of this permission shall be submitted to and approved in writing by the Local Planning Authority before any work above grade in connection with this permission is carried out, for each of the following phases:

SH4  
SH5  
SH7  
SH8  
SH9

The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with saved policies: Part 7 of the NPPF 2019; Policy SP12 of the Core Strategy (2011) and saved Policies 3.12 Quality in Design; 3.13 Urban Design; of The Southwark Plan (2007). (2007).

20. TV Surveys

Before any above grade work hereby authorised begins, details of how the impact of the development on television, radio and other telecommunications services will be assessed, the method and results of surveys carried out, and the measures to be taken to rectify any problems identified shall be submitted to and approved in writing by the Local Planning Authority. The premises shall not be occupied until any such mitigation measures as may have been approved have been implemented.

Reason

In order to ensure that any adverse impacts of the development on reception of residential properties is identified and resolved satisfactorily in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 - High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007.

21. Designing out crime

Before any above grade work hereby authorised begins, details of security measures shall be submitted and approved in writing by the Local Planning Authority.



Any such security measures shall be implemented prior to occupation in accordance with the approved details which shall seek to achieve the 'Secured by Design' accreditation award from the Metropolitan Police.

Reason:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with: the National Planning Policy Framework 2019; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.14 (Designing out crime) of the Southwark Plan 2007.

**Permission is subject to the following Pre-Occupation Conditions**

22. Signage strategy

The commercial units hereby permitted shall not be occupied until a site wide signage strategy detailing the design code for the proposed frontage of the commercial units facing street and routes (including advertisement zones, awnings, and spill-out zones) shall be submitted to and approved in writing by the Local Planning Authority and thereafter implemented in accordance with the approved details.

Reason

In order to ensure that the quality of the design and details are in accordance with Strategic Policy 12 - Design and conservation of the Core Strategy 2011 and saved Policies 3.12 Quality in design and 3.13 Urban design of the Southwark Plan 2007.

23. Solar glare screening

Prior to the first occupation, details of any device to prevent solar glare and light pollution to surrounding residential properties shall be submitted and approved and thereafter installed on the development and permanently retained and maintained as part of the structure of the building as such for as long as the development is occupied.

Reason

In order that the privacy of surrounding occupiers from solar glare and light pollution in accordance with Saved Policies 3.1 Environmental Effects and 3.2 Protection of Amenity of the Southwark Plan 2007, SP 13 High Environmental Standards of the Core Strategy 2011 and the Residential Design Standards SPD 2011.

24. Electric vehicles

Before the first occupation of the building hereby approved, details of the installation (including location and type) of at least 50% of the car parking spaces shall be provided with active vehicle charging points and the remaining 50% shall have passive installation. Details shall be submitted to and approved in writing by the Local Planning Authority and the electric vehicle charger points shall be installed prior to occupation of the development and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

To encourage more sustainable travel, in accordance with: the National Planning Policy Framework 2019; Strategic Policy 2 (Sustainable Transport) of the Core Strategy 2011, and; Saved Policies 3.1 (Environmental Effects) and 5.2 (Transport Impacts) of the Southwark Plan 2007.

25. VENTILATION DETAILS

Prior to the commencement of use, full particulars and details of a scheme for the ventilation of

the premises to an appropriate outlet level, including details of sound attenuation for any necessary plant and the standard of dilution expected, has been submitted to and approved by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given.

**Reason**

In order to ensure that that the ventilation ducting and ancillary equipment will not result in an odour, fume or noise nuisance and will not detract from the appearance of the building in the interests of amenity in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 - High Environmental Standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

**26. DETAILS OF THE REFUSE STORAGE FACILITIES**

Before the first occupation of the development hereby permitted begins, details of the arrangements for the storing of domestic and commercial refuse (whichever is applicable) shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter, the approved refuse storage facilities shall be provided and made available for use by the occupiers of the development and the facilities shall thereafter be retained and shall not be used or the space used for any other purpose.

**Reason:**

To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with: the National Planning Policy Framework 2019; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity) and 3.7 (Waste Reduction) of the Southwark Plan 2007.

**27. DETAILS OF THE SHOWERING FACILITIES**

Before the first occupation of the development, details of showering facilities to be provided for commercial units over 1000 sq.m shall be submitted to and approved in writing by the Local Planning Authority and thereafter the shower facilities shall be retained and the space used for no other purpose.

**Reason:**

In order to ensure that satisfactory facilities are provided and retained in order to encourage the use of non-car based travel, in accordance with: The National Planning Policy Framework 2019; Strategic Policy 2 (Sustainable Transport) of The Core Strategy 2011, and; Saved Policies 5.2 (Transport Impacts) and 5.3 (Walking and Cycling) of the Southwark Plan 2007.

**Permission is subject to the following Compliance Conditions**

**28. CPZ exemption**

No developer, owner or occupier of any part of the development hereby permitted, with the exception of disabled persons, shall seek, or will be allowed, to obtain a parking permit within the controlled parking zone in Southwark in which the application site is situated.

**Reason:**

To ensure compliance with: Strategic Policy 2 (Sustainable Transport) of the Core Strategy 2011, and; Saved Policy 5.2 (Transport Impacts) of the Southwark Plan 2007.

**29. Noise**

The machinery, plant or equipment installed or operated in connection with the carrying out of this permission shall be so enclosed and/or attenuated that noise there from does not, at any

time, increase the ambient equivalent noise level when the plant, etc., is in use as measured at any adjoining or nearby premises in separate occupation; or (in the case of any adjoining or nearby residential premises) as measured outside those premises; or (in the case of residential premises in the same building) as measured in the residential unit.

Reason

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance from plant and machinery in accordance with the National Planning Policy Framework 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

30. Hours of use

The A1-A5 retail uses and D1/D2 cultural uses hereby permitted for shall not be carried on outside of the hours 7am and 11pm Mondays to Sundays.

Reason:

To safeguard the amenities of neighbouring residential properties in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of The Southwark Plan 2007.

31. Internal noise standard

The dwellings hereby permitted shall be designed to ensure that the following internal noise levels are not exceeded due to environmental noise:

Bedrooms - 30dB LAeq, T \* and 45dB LAFmax

Living rooms - 30dB LAeq, T \*\*

\* - Night-time 8 hours between 23:00-07:00

\*\* - Daytime 16 hours between 07:00-23:00.

Reason

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011) saved policies 3.2 'Protection of amenity' and 4.2 'Quality of residential accommodation' of the Southwark Plan (2007), and the National Planning Policy Framework 2019.

32. No roof plant

No roof plant, equipment or other structures, other than as shown on the plans hereby approved or approved pursuant to a condition of this permission, shall be placed on the roof or be permitted to project above the roofline of any part of the buildings as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosures of any buildings hereby permitted.

Reason

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with The National Planning Policy Framework 2019, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.13 Urban Design of the Southwark Plan 2007.

## 33. Restriction on use class

At any time at least 50% of the overall retail area on the ground floor shall be used for purposes falling within Class A1 (shops) of the Town and Country Uses Classes Order 1987 (as amended) and no more than 25% of the retail area should be used as Classes A4 and A5 (drinking establishments and take aways) of the Town and Country Planning Use Classes Order 1987 (as amended). No part of the Class D1/D2 space shall be used as a gym.

## Reason

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case and wishes to have the opportunity of exercising control over any subsequent alternative use in accordance with Strategic Policy 13 - High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007 and the National Planning Policy Framework 2012.

## 34. Replacement planting

Any tree or shrub required to be retained or to be planted as part of a landscaping scheme approved, either as part of this decision or arising from a condition imposed as part of this decision, that is found to be dead, dying, severely damaged or seriously diseased within two years of the completion of the building works OR two years of the carrying out of the landscaping scheme (whichever is later), shall be replaced by specimens of similar or appropriate size and species in the first suitable planting season.

## Reason:

To ensure that the details of the scheme are in accordance with Strategic Policy 11 Open spaces and wildlife and Strategic Policy 12 Design and conservation of The Core Strategy 2011 and Saved Policies 3.12 Quality in Design, 3.13 Urban design and 3.28 Biodiversity of the Southwark Plan 2007

**Permission is subject to the following Special Conditions**

## 35. BREEAM

Before any fit out works to the commercial premises hereby authorised begins, an independently verified BREEAM report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) shall be submitted to and approved in writing by the Local Planning Authority demonstrating that it would be capable of achieving of a minimum excellent rating and the development shall not be carried out otherwise than in accordance with any such approval given;

Before the first occupation of the building hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed standards at (a) have been met.

## Reason

To ensure the proposal complies with The National Planning Policy Framework 2019, Strategic Policy 13 - High Environmental Standards of The Core Strategy 2011 and Saved Policies 3.3 Sustainability and 3.4 Energy Efficiency of the Southwark Plan 2007.

## 36. Within six months of the completion of archaeological site works, an assessment report detailing the proposals for post-excavation works, publication of the site and preparation of the archive shall be submitted to and approved in writing by the Local Planning Authority and that the works detailed in this assessment report shall not be carried out otherwise than in accordance with

any such approval given.

Reason: In order that the archaeological interests of the site are secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2019.

The Council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

The Council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

The Council commits to negotiating with applicants wherever possible to secure changes and/or additional information to a scheme to make it acceptable. The case officer adopted this approach when bringing this application to a conclusion.

The application was validated promptly and decided within the statutory determination period.

### **Informatives**

#### Network Rail Informative

The developer must ensure that their proposal, both during construction and after completion of works on site, does not encroach onto Network Rail land affect the safety, operation or integrity of the company's railway and its infrastructure undermine its support zone damage the company infrastructure place additional load on cuttings adversely affect any railway land or structure oversail or encroach upon the airspace of any Network Rail land cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

The developer should comply with the following comments and requirements for the safe operation of the railway and the protection of Network Rail adjoining land.

#### Future maintenance

The development must ensure any future maintenance can be conducted solely on the applicant land. The applicant must ensure that any construction and any subsequent maintenance can be carried out to any proposed buildings or structures without adversely affecting the safety of, or encroaching upon Network Rail adjacent land and airspace, and therefore all and any building should be situated at least 2 metres, 3m for overhead lines and third rail, from Network Rail boundary. The reason for the 2m, 3m for overhead lines and third rail, stand off requirement is to allow for construction and future maintenance of a building and without requirement for access to the operational railway environment which may not necessarily be granted or if granted subject to railway site safety requirements and special provisions with all associated railway costs charged to the applicant. Any less than 2m, 3m for overhead lines and third rail and there is a strong possibility that the applicant, and any future resident, will need to utilise Network Rail land and airspace to facilitate works. The applicant would need to receive approval for such works from the Network Rail Asset Protection Engineer, the applicant or resident would need to submit the request at least 20 weeks before any works were due to commence on site and they would be liable for all costs. However, Network Rail is not required to grant permission for any third party access to its land. No structure or building should be built hard against Network Rail boundary as in this case there is an even higher probability of access to Network Rail land being required to undertake any

construction and maintenance works. Equally any structure or building erected hard against the boundary with Network Rail will impact adversely upon our maintenance teams ability to maintain boundary fencing and boundary treatments.

#### Drainage

Storm and surface water must not be discharged onto Network Rail property or into Network Rail culverts or drains except by agreement with Network Rail. Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run off onto Network Rail property. Proper provision must be made to accept and continue drainage discharging from Network Rail property, full details to be submitted for approval to the Network Rail Asset Protection Engineer. Suitable foul drainage must be provided separate from Network Rail existing drainage. Soakaways, as a means of storm and surface water disposal must not be constructed near or within 10 to 20 metres of Network Rail boundary or at any point which could adversely affect the stability of Network Rail property. After the completion and occupation of the development, any new or exacerbated problems attributable to the new development shall be investigated and remedied at the applicants expense.

#### Plant and Materials

All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail property, must at all times be carried out in a fail safe manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 3.0m of the boundary with Network Rail.

#### Scaffolding

Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over sail the railway and protective netting around such scaffold must be installed. The applicant or applicant contractor must consider if they can undertake the works and associated scaffold or access for working at height within the footprint of their property boundary.

#### Piling

Where vibro compaction or displacement piling plant is to be used in development, details of the use of such machinery and a method statement should be submitted for the approval of the Network Rail Asset Protection Engineer prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.

#### Fencing

In view of the nature of the development, it is essential that the developer provide, at their own expense, and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. The 1.8m fencing should be adjacent to the railway boundary and the developer or applicant should make provision for its future maintenance and renewal without encroachment upon Network Rail land. Network Rail existing fencing or wall must not be removed or damaged and at no point either during construction or after works are completed on site should the foundations of the fencing or wall or any embankment therein, be damaged, undermined or compromised in any way. Any vegetation on Network Rail land and within Network Rail boundary must also not be disturbed. Any fencing installed by the applicant must not prevent Network Rail from maintaining its own fencing or boundary treatment.

#### Lighting

Any lighting associated with the development, including vehicle lights, must not interfere with the sighting of signalling apparatus and or train drivers vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. The developers should obtain Network Rail Asset Protection Engineer approval of their detailed proposals regarding lighting.

#### Noise and Vibration

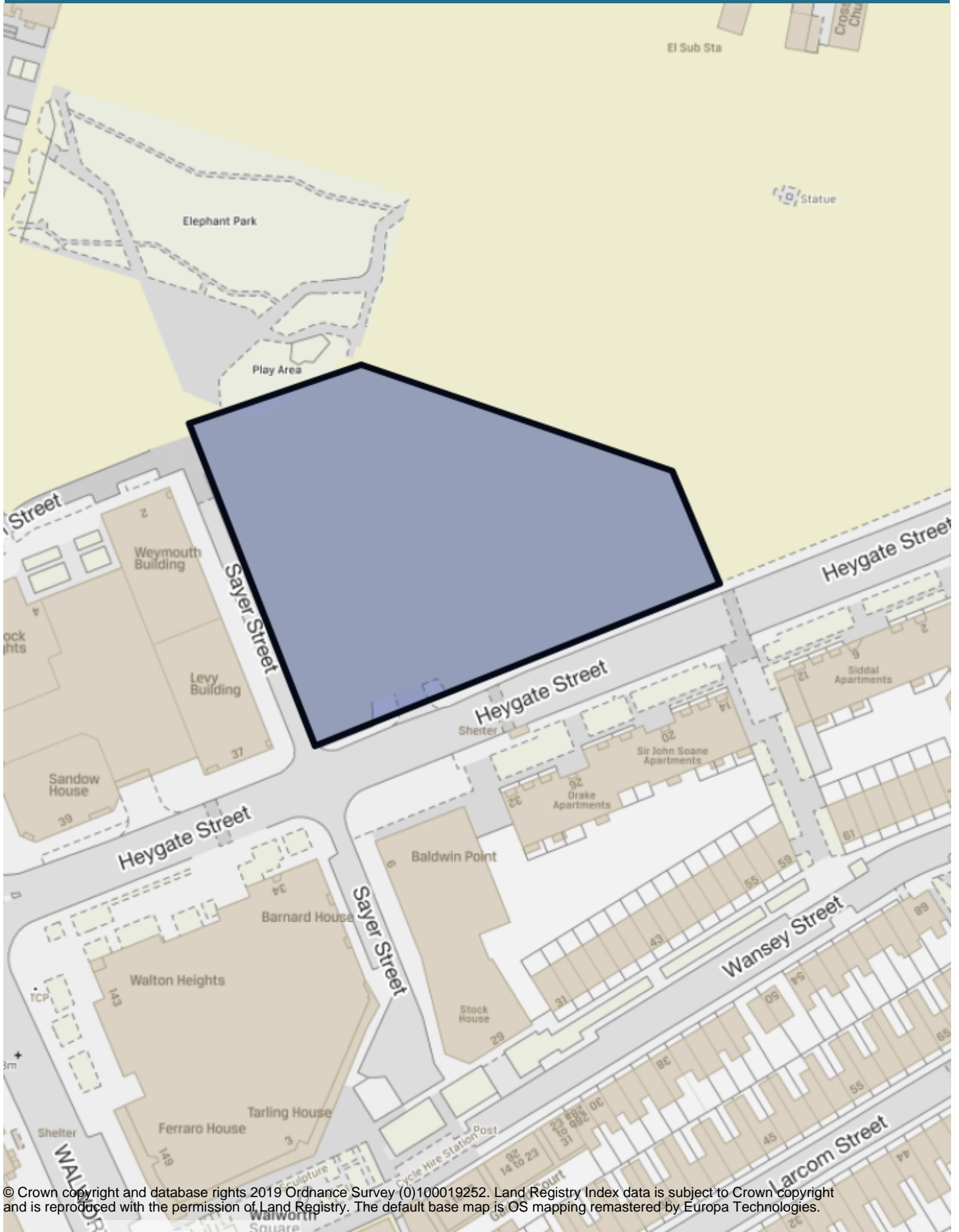
The potential for any noise or vibration impacts caused by the proximity between the proposed development and any existing railway must be assessed in the context of the National Planning Policy Framework which hold relevant national guidance information. The current level of usage may be subject to change at any time without notification including increased frequency of trains, night time train running and heavy freight trains.

#### Vehicle Incursion

Where a proposal calls for hard standing area parking of vehicles area near the boundary with the operational railway, Network Rail would recommend the installation of a highways approved vehicle incursion barrier or high kerbs to prevent vehicles accidentally driving or rolling onto the railway or damaging lineside fencing Network Rail strongly recommends the developer contacts Asset Protection prior to any works commencing on site, and also to agree an Asset Protection Agreement to enable approval of detailed works.



Plot 7 Heygate Street Within Land Bounded By Elephant Park To The North, Plot H2 North To The West, Heygate Street To The South & H11B To The East, London SE17



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4-Feb-2020



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<b>Item No.</b> 6.2	<b>Classification:</b> Open	<b>Date:</b> 24 February 2020	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<p><b>Development Management planning application:</b> Application 19/AP/1166 for: Approval of reserved matters</p> <p><b>Address:</b> PLOT H7 HEYGATE STREET WITHIN LAND BOUNDED BY ELEPHANT PARK TO THE NORTH, PLOT H2 TO THE WEST, HEYGATE STREET TO THE SOUTH AND H11B TO THE EAST, LONDON SE17</p> <p><b>Proposal:</b> Application for the approval of reserved matters (access, scale, appearance, layout and landscaping) for Plot H7 within Elephant Park (previously referred to as the Heygate Masterplan), submitted pursuant to Outline Planning Permission ref: 12/AP/1092. The proposal comprises the construction of a development ranging between 9 and 25 storeys in height (maximum building height 86.75 m AOD), comprising 424 residential units, 1,237sqm (GEA) of flexible retail (Classes A1-A5) uses and 628 sqm (GEA) flexible retail, community and leisure (Classes A1-A5, D1-D2), car parking, cycle storage, servicing, plant areas, landscaping, public realm, and other associated works.</p>		
<b>Ward(s) or groups affected:</b>	North Walworth		
<b>From:</b>	Director of Planning		
<b>Application Start Date</b> 18/04/2019		<b>Application Expiry Date</b> 18/07/2019	
<b>Earliest Decision Date</b> 01/06/2019			

## RECOMMENDATION

1. That approval of reserved matters be granted subject to conditions.

## EXECUTIVE SUMMARY

2. This application is being referred to the planning committee because more than five objections have been received.
3. This is a reserved matters application for Plot H7, which is in the fifth construction phase MP5 of Elephant Park and sits near the centre of the larger redevelopment site. It is submitted pursuant to the 2013 outline planning permission (ref. 12/AP/1092) for the redevelopment of the former Heygate Estate. It proposes a residential-led development comprising 424 flats in two nine-storey mansion blocks and a 25-storey tower, and 1,865sqm of Class A, D1 and D2 uses across the ground floor.
4. The proposal would accord with the parameters and requirements of the outline planning permission and later non-material amendments, in terms of the scale and height of the plot, its uses, and affordable housing provision. The 72 affordable units (35 affordable rent and 37 shared ownership) in this plot would contribute towards the 25% provision

required by the outline permission, and as the final residential plot would ensure this required provision is achieved (and exceeded) across Elephant Park. All the objections received to the application were to the quantum of affordable housing.

5. The form and architecture of the plot are appropriate for this central plot that sits between the new park and Heygate Street. It would make a positive contribution to the character of Elephant Park, and provide public realm on all sides. The tower would not harm the setting of listed buildings and conservation areas around Elephant Park, nor the borough view of St Paul's Cathedral nor LVMF view from Serpentine Bridge to Westminster.
6. The density of the scheme is above that expected in the Central Activities Zone, although similar to other approved plots within Elephant Park, and as anticipated by the outline permission. Amendments were made to the application to improve the quality of some of the residential units, and the scheme includes indicators of an exemplary residential design.
7. Existing homes in adjacent Plots H2 and H6 would experience a noticeable change in daylight, and flats yet to be constructed in Plot H11B would experience a noticeable change in sunlight hours. The siting and massing of the scheme are within the parameters of the outline permission, and its impacts on the amenity of neighbouring properties (which are other plots within the Elephant Masterplan) are in line with those envisaged in the outline application.
8. Planning aspects such as the sustainability of this plot and its highways impacts are acceptable, and would tie in with obligations and the mitigation secured by the permission.
9. The application is recommended for approval, subject to the imposition of conditions.

## **BACKGROUND INFORMATION**

### **Site location and description**

10. Plot H7 is within the red line boundary of the outline planning permission (OPP) which was granted in March 2013. Plot H7 forms part of the fifth and final phase (MP5) of the delivery of Elephant Park, formerly known as the Heygate Masterplan. Plot H7's site area is 0.76 hectare and is in the middle of the Elephant Park site. It currently contains the temporary Lendlease site offices and Construction Skills Centre.
11. Plot H7 is surrounded by Plot H2 to the west (recently occupied), the new park to the north, Plot H11B to the east (approved but construction has yet to begin) and the now occupied plots on the southern side of the Heygate Street (Plots H6 and H3). It will form the eastern side of Sayer Street (the new shopping street), part of the southern boundary of the central park, and part of the northern side of Heygate Street.
12. The arrangement of the plots in Elephant Park is shown by the site layout below:



*Elephant Park with the Plot H7 RMA site marked in red*

13. The OPP established five character areas within the masterplan site; Plot H7 is predominantly within the Park Character Area, but overlaps with the Walworth Road and Walworth Local Character Areas.

### **The surrounding area**

14. The land uses within the immediate vicinity are predominantly residential with the first phase of Elephant Park now occupied on the southern side of Heygate Street. The recently complete Plot H2 on the western side of Sayer Street has new retail units on the ground floor and residential units on its upper levels. To the north-west is future Plot H1 which is intended as an office-led mixed use plot. To the northern side of the plot is the new park and Plots H4 and H5 are nearing completion on the New Kent Road frontage. Future Plot H11B is to the east where construction is yet to start, and is again primarily residential, with ground floor retail units, along with other recent residential developments either side of Rodney Road.
15. There are listed buildings at some distance from this plot including:
- The Brotherhood for the Cross and the Star grade II listed church on Falmouth Road, approximately 200m to the north of the site.
  - Nos. 154-170 New Kent Road, grade II listed, 270m to the north-east of the site.
  - Driscoll House no. 172 New Kent Road, grade II listed, 350m to the north-east of the site.
  - Elephant House 4 Victory Place, grade II listed, 230m to the east of the site.
  - Former Southwark Municipal Offices, Southwark central library and Cuming museum,

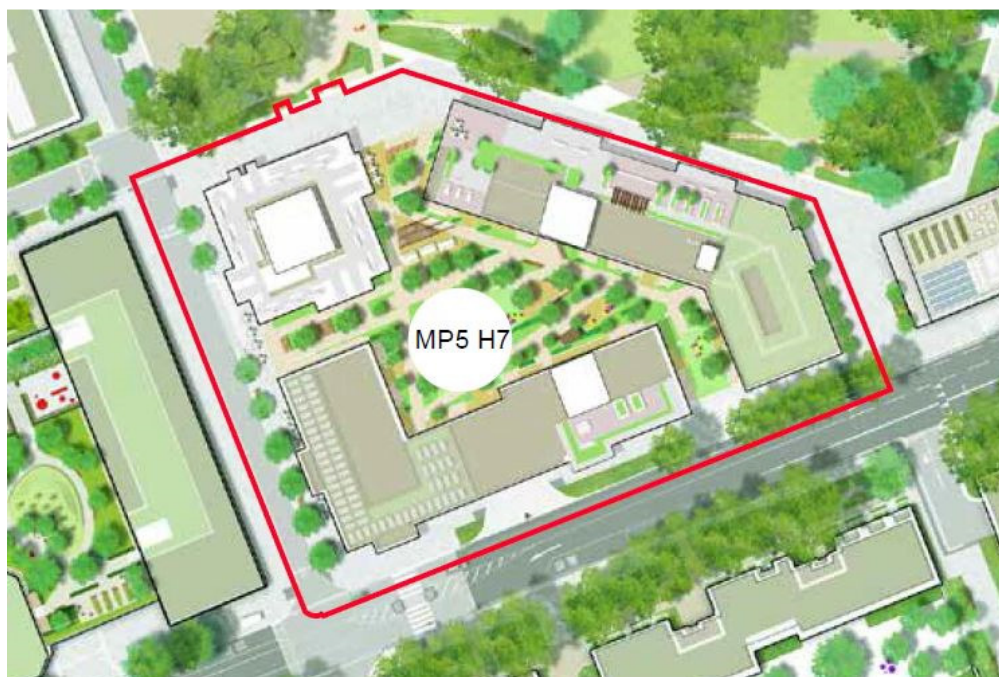
The Walworth Clinic, Church of St John the Evangelist, and 140-152 Walworth Road, all grade II listed, with the closest being 120m to the south of the site.

- Metropolitan Tabernacle, grade II listed, 290m to the west of the site.
- Michael Faraday memorial, grade II listed, 320m to the north-west of the site.
- Metro Central Heights, grade II listed, 280m to the north-west of the site.

16. The Larcom Street Conservation Area and Walworth Road Conservation Area extend to the southern side of Wansey Street, and are approximately 100 metres to the south of Plot H7, separated by other plots.

### Details of proposal

17. This reserved matters application (RMA) seeks approval of the reserved matters - the access, scale, appearance, layout, and landscaping - for the Plot H7 building and surrounding public realm. It is submitted pursuant to the outline planning permission (OPP) for the redevelopment of the former Heygate Estate, ref. 12/AP/1092.
18. This proposal comprises 424 residential units at first floor and above, and a total of 1,865sqm of retail, community and leisure uses (Classes A1-A5/D1/D2) across the ground floor. The plot would comprise a podium building with two blocks and a tower above. 352 of the residential units would be market housing, and 72 would be affordable. Of the commercial floor space, 1,237sqm is proposed for flexible retail Class A1-A5, and another 628sqm as flexible retail Class A1-A5, community (Class D1) and leisure (Class D2).
19. The plot is made up of five principal elements, which are described in more detail below:
- A tall building
  - A mansion block fronting the Park
  - A mansion block fronting Heygate Street and Sayer Street
  - The public realm
  - A central podium garden.



*Arrangement of the two mansion blocks and tower*

20. Tall building – Block D would be 25 storeys high (82m high to the lift overrun), 29.5m by 29.5m wide, and located at the north-western corner of the plot. It would have two ground floor retail units opening onto Sayer Street, as well as two resident amenity rooms and concierge at the ground level. The residents entrance would face onto the park, and be double height with stairs and lifts taking residents up to the first floor (where two further amenity rooms are proposed) to reach the podium garden which links all the blocks. 181 homes would be provided from the first floor up, with a further amenity room and roof terrace at the 24<sup>th</sup> floor. It would be constructed from concrete panels in a pale buff colour for the main facades, with the projecting element on each elevation in profiled darker panels, metal spandrel panels and glass balustrades to the balconies, with textured concrete for the base.



*Visual of the base of the tower from the park, looking down Sayer Street*

21. Mansion block fronting the Park - Block A/E would be a midrise mansion block of 9 storeys (32m high to the parapet and 35.5m high to the lift overrun) fronting onto the park along the north-eastern and eastern sides of the plot. Its footprint would be 19.1m deep and 60.7m long fronting the park, and a further 27.8m long facing onto Plot H11B. A large Class A retail unit is proposed on the ground floor of the northern side, and two smaller units (for flexible uses Class A1-5, D1 or D2) on the north-eastern side.
22. The building would be in brick, with a masonry base and glazed tiles to the two residential entrances. It would provide 123 homes on the eight floors, each with a balcony or terrace, and have a communal roof garden.



*Visual showing the park mansion block in the centre, tower to the right and Plot H11B to the left*

23. Mansion block fronting Heygate Street and Sayer Street - Block B/C would be an L-shaped, midrise mansion block of nine storeys (32m to parapet, 35.5m to the lift overrun). It would front onto Heygate Street on the southern side of the plot and onto Sayer Street on the western side. Its footprint would be 19.2m deep, and 67.7m wide along Heygate Street, and 35m wide along Sayer Street. Four retail units (Class A1-A5) are proposed along the Sayer Street frontage, and flexible retail or Class D1 and D2 uses on two units on Heygate Street.
24. The building would be in brick, with a masonry base and glazed tiles to the two residential entrances on Heygate Street. It would provide 120 homes on the floors above (including the affordable housing) each with a balcony or terrace. A communal roof garden is proposed above block B. Bin storage, cycle store and plant rooms are also proposed at ground floor.



*Visual showing the mansion block at the corner of Heygate Street and Sayer Street, and tower beyond*



*Visual showing Plot H10 to the left, the proposed Heygate Street mansion block near the centre (and the tower of Plot H2 in the distance), the flank of the park mansion block to the right, and Plot H11B at the far right*

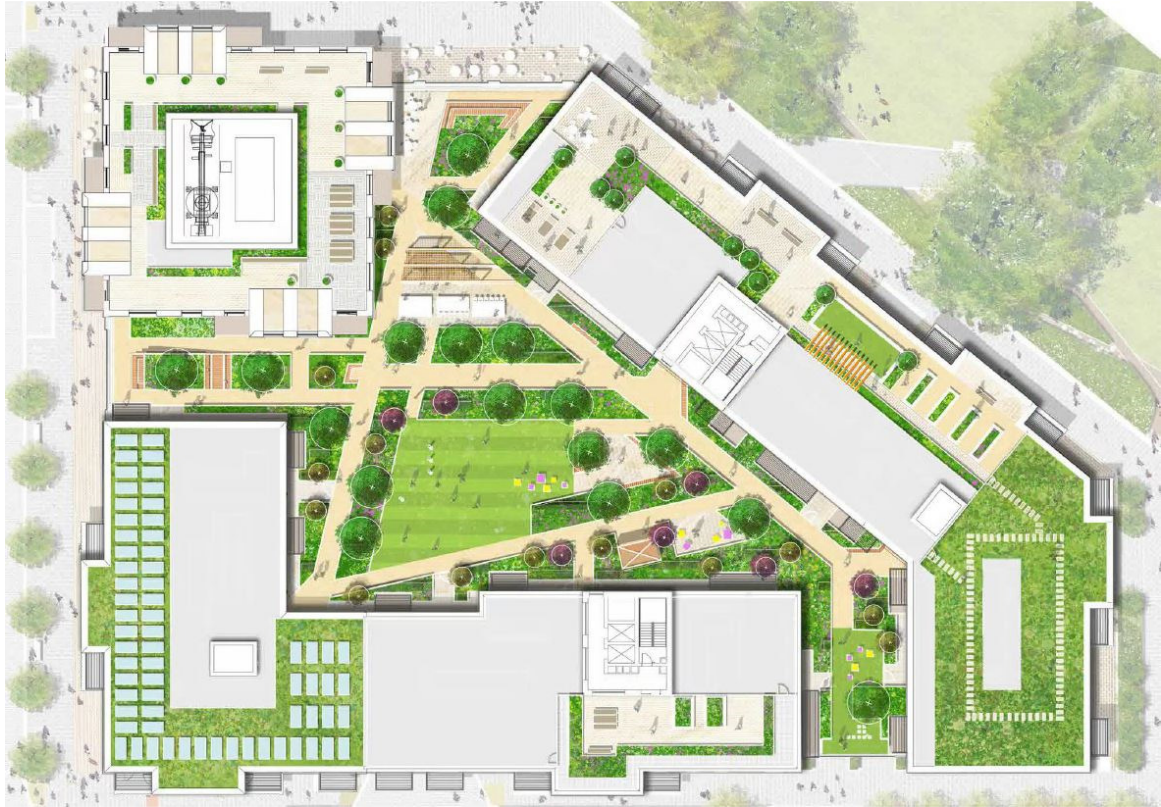


25. Public realm – landscaped public realm is proposed surrounding the building to provide the eastern pavement of Sayer Street and spill out space for the retail units, the northern pavement along Heygate Street, and a pedestrian and cycle route (that would allow for emergency vehicles) along the northern side along the edge of the park and down to Heygate Street at the eastern side. Granite pavers would be the main surfacing material, with brick and stone paving used in front of the retail units on Sayer Street and the park frontage to denote their spill out spaces.
26. Street trees would be incorporated on Heygate Street, Sayer Street, and planting along Heygate Street to separate the pavement from the road. A drop off bay would be provided on Sayer Street, and cycle parking.



*Visual of the public realm around the plot (NB the drop off bay on Heygate Street has been removed)*

27. Central podium garden – a landscaped communal garden is proposed across the podium, accessible from all blocks. It would include two areas of playspace, a central lawn and a series of green spaces and different layers of planting.
28. Trees, seating, paths and pergolas would be incorporated. The podium garden would extend through the gaps between the three blocks to the street frontages, making it visible from the ground level. This communal area would be accessible to all residents, in addition to the private amenity spaces and roof gardens.



*Visual of the communal garden that extends across the podium and accessible to all residents, and the roof terraces.*

29. Servicing would take place within the internal servicing yard accessed from Heygate Street, with space for three parked vehicles. Two wheelchair parking spaces are also proposed in this servicing yard (and internal corridors provide links to the lift cores of each block). Further wheelchair parking spaces can be provided in the basement car park of neighbouring Plot H2 should there be demand. 466 cycle parking spaces are proposed for residents, 16 spaces for retail staff within a store, and short stay parking within the public realm around the plot.

### **Amendments**

30. Amendments were made during the course of the application to respond to comments from officers:
- Removal of a drop off bay on Heygate Street.
  - Improvements the quality of particular residential units in the mansion blocks by: adding windows to block B on the northern and southern elevations; enlarging windows on blocks A, B and C; moving balconies to be slightly offset from the windows on blocks A, B, C and E to improve the daylight levels; and increasing the size of some units by moving the dividing walls between flats.

### **Planning history**

31. The site sits in the centre of the Elephant Park site, which has extensive history for the reserved matters, condition details and section 106 details for the plots in the first four construction phases. See Appendix 3 for the relevant planning history of this plot.
32. A non-material amendment application for this plot (ref. 19/AP/0952) was approved in May 2019 which sought agreement of the changes to some of the approved parameters

for Plot H7 which this RMA complies with.

33. There is a current application ref. 19/AP/7609 recently made valid for:  
 “Construction of a relocated 5-storey site welfare and project office (2,755sqm GEA) near the centre of the site, associated with the Elephant Park development together with landscaping and other associated works for a temporary period of 7 years.”

### **Planning history of adjoining sites**

#### Park

34. A reserved matters application is under consideration for the permanent park in the centre of the Elephant Park masterplan (to the north of Plot H7), ref. 19/AP/5787.

#### Sayer Street

35. Recent permission ref. 19/AP/0911 granted January 2020 approved temporary pop up structures along the eastern side of Sayer Street immediately next to Plot H7. These would provide interest and activities along this part of Sayer Street until Plot H7 is complete.

#### Plot H11B

36. RMA ref. 18/AP/1863 approved September 2018 for:  
 “Application for the approval of reserved matters (access, scale, appearance, layout and landscaping) for Plot H11B within Elephant Park (previously referred to as the Heygate Masterplan), submitted pursuant to the Outline Planning Permission ref: 12/AP/1092. The proposals comprise the construction of two buildings of between 11 and 25 storeys in height (maximum building height 84.2m AOD) comprising 259 residential units, 285 sqm (GEA) flexible retail, office, community and leisure uses (Classes A1-A5/B1/D1/D2), cycle storage, servicing, plant areas, landscaping, new public realm, and other associated works.”

#### Elephant and Castle Shopping Centre

37. Permission ref. 16/AP/4458 granted in January 2019 for:  
 “Phased, mixed-use redevelopment of the existing Elephant and Castle shopping centre and London College of Communication sites comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 35 storeys (with a maximum building height of 124.5m AOD) above multi-level and single basements, to provide a range of uses including 979 residential units (use class C3), retail (use Class A1-A4), office (Use Class B1), Education (use class D1), assembly and leisure (use class D2) and a new station entrance and station box for use as a London underground operational railway station; means of access, public realm and landscaping works, parking and cycle storage provision, plant and servicing areas, and a range of other associated and ancillary works and structures.”

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

38. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land uses;
  - Conformity with the Outline Planning Permission;
  - Environmental impact assessment;
  - Density and dwelling mix;
  - Affordable housing;
  - Quality of residential accommodation;

- Impact on the amenities of occupiers of adjoining properties;
- Impact of adjoining uses on future occupiers of the development;
- Design issues, including impact on heritage assets;
- Trees, landscaping, public realm and ecology;
- Transport and highway;
- Wind microclimate;
- Air quality;
- Sustainable development implications;
- Planning obligations;
- Community Infrastructure Levy (CIL);
- Community involvement and engagement;
- Community impact and equalities assessment;
- Human rights; and
- Positive and proactive statement.

39. These matters are discussed in detail in the 'Assessment' section of this report.

### **Legal context**

40. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2016, the Core Strategy 2011, and the Saved Southwark Plan 2007. The 2013 OPP are key material considerations.
41. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

### **Adopted planning policy**

42. The application site is located within:
- Central Activities Zone
  - Elephant and Castle Opportunity Area
  - Elephant and Castle Major Town Centre
  - Air Quality Management Area
  - Public Transport Accessibility Level 6b (excellent)
  - Flood Zone 3.
43. The site forms part of designated Proposal Site 39P 'Elephant and Castle Core Area' in the Southwark Plan policy SP20, which identifies a large central area of land for comprehensive redevelopment.
44. Elephant and Castle (including this plot) lies in the background of the townscape view looking from the Serpentine Bridge in Hyde Park to Westminster (Townscape View 23A.1 of the London View Management Framework 2011). The plot falls within the alignment of the important borough view of St Paul's Cathedral on the draft New Southwark Plan (see below).
45. The following policies and guidance are considered most relevant to the determination of this Plot H7 reserved matters application.

### National Planning Policy Framework

46. The National Planning Policy Framework (NPPF) is a material consideration. The revised NPPF was published in February 2019 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.
47. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications. The relevant sections are:
- Section 2 Achieving sustainable development
  - Section 5 Delivering a sufficient supply of homes
  - Section 6 Building a strong, competitive economy
  - Section 7 Ensuring the vitality of town centres
  - Section 8 Promoting healthy and safe communities
  - Section 9 Promoting sustainable transport
  - Section 11 Making efficient use of land
  - Section 12 Achieving well-designed places
  - Section 14 Meeting the challenge of climate change, flooding and coastal change
  - Section 15 Conserving and enhancing the natural environment
  - Section 16 Conserving and enhancing the historic environment.

### The London Plan (2016)

48. The London Plan is the regional planning framework and was adopted in 2016. The relevant policies of the London Plan 2016 are:
- Policy 2.10 Central Activities Zone – Strategic Priorities
  - Policy 2.11 Central Activities Zone – Strategic Functions
  - Policy 2.12 Central Activities Zone – Predominantly Local Activities
  - Policy 2.13 Opportunity Areas and Intensification Areas
  - Policy 2.15 Town Centres
  - Policy 2.18 Green Infrastructure: The Multi Functional Network of Green and Open Spaces.
  - Policy 3.1 Ensuring Equal Life Chances For All
  - Policy 3.2 Improving Health and Addressing Health Inequalities
  - Policy 3.3 Increasing Housing Supply
  - Policy 3.4 Optimising Housing Potential
  - Policy 3.5 Quality and Design of Housing Developments
  - Policy 3.6 Children and Young People’s Play and Informal Recreation Facilities
  - Policy 3.7 Large Residential Developments
  - Policy 3.8 Housing Choice
  - Policy 3.9 Mixed and Balanced Communities
  - Policy 3.13 Affordable Housing Thresholds
  - Policy 4.7 Retail and Town Centre Development
  - Policy 4.8 Supporting a Successful and Diverse Retail Sector
  - Policy 4.9 Small Shops
  - Policy 4.12 Improving Opportunities for All
  - Policy 5.1 Climate Change Mitigation
  - Policy 5.2 Minimising Carbon Dioxide Emissions
  - Policy 5.3 Sustainable Design and Construction
  - Policy 5.5 Decentralised Energy Networks
  - Policy 5.6 Decentralised Energy in Development Proposals
  - Policy 5.7 Renewable Energy
  - Policy 5.9 Overheating and Cooling
  - Policy 5.10 Urban Greening

Policy 5.11 Green Roofs and Development Site Environs  
 Policy 5.12 Flood Risk Management  
 Policy 5.13 Sustainable Drainage  
 Policy 5.14 Water Quality and Wastewater Infrastructure  
 Policy 5.15 Water Use and Supplies  
 Policy 5.21 Contaminated Land  
 Policy 6.3 Assessing Effects of Development on Transport Capacity  
 Policy 6.9 Cycling  
 Policy 6.10 Walking  
 Policy 6.13 Parking  
 Policy 7.1 Lifetime Neighbourhoods  
 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 Buildings  
 Policy 7.8 Heritage Assets and Archaeology  
 Policy 7.12 Implementing the London View Management Framework  
 Policy 7.13 Safety, Security and Resilience to Emergency  
 Policy 7.14 Improving Air Quality  
 Policy 7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes  
 Policy 7.19 Biodiversity and Access to Nature  
 Policy 7.21 Trees and Woodland.

#### Core Strategy (2011)

49. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy are:
- Strategic Policy 1 – Sustainable development
  - Strategic Policy 2 – Sustainable transport
  - Strategic Policy 3 – Shopping, leisure and entertainment
  - Strategic Policy 4 – Places for learning, enjoyment and healthy lifestyles
  - Strategic Policy 5 – Providing new homes
  - Strategic Policy 6 – Homes for people on different incomes
  - Strategic Policy 7 – Family homes
  - Strategic Policy 10 – Jobs and businesses
  - Strategic Policy 11 – Open spaces and wildlife
  - Strategic Policy 12 – Design and conservation
  - Strategic Policy 13 – High environmental standards.

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

50. The council's cabinet on 19 March 2013, as required by paragraph 215 of the NPPF (2012), considered the issue of compliance of Southwark Planning Policy with the NPPF. All policies and proposals were reviewed and the council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of Policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF:
- Policy 1.1 Access to employment opportunities
  - Policy 1.7 Development within town and local centres
  - Policy 2.2 Provision of new community facilities

Policy 3.1 Environmental effects  
 Policy 3.2 Protection of amenity  
 Policy 3.3 Sustainability assessment  
 Policy 3.4 Energy efficiency  
 Policy 3.6 Air quality  
 Policy 3.7 Waste reduction  
 Policy 3.9 Water  
 Policy 3.11 Efficient use of land  
 Policy 3.12 Quality in design  
 Policy 3.13 Urban design  
 Policy 3.14 Designing out crime  
 Policy 3.15 Conservation of the historic environment  
 Policy 3.18 Setting of listed buildings, conservation areas and World Heritage Sites  
 Policy 3.19 Archaeology  
 Policy 3.20 Tall buildings  
 Policy 3.22 Important local views  
 Policy 3.28 Biodiversity  
 Policy 4.2 Quality of residential accommodation  
 Policy 4.3 Mix of dwellings  
 Policy 4.4 Affordable housing  
 Policy 4.5 Wheelchair affordable housing  
 Policy 5.2 Transport impacts  
 Policy 5.3 Walking and cycling  
 Policy 5.6 Car parking  
 Policy 5.7 Parking standards for disabled people and the mobility impaired  
 Policy 5.8 Other parking  
 SP20 – Development Site Uses.

#### GLA SPGs

51. The following Supplementary Planning Guidance issued by the GLA are material considerations:
- Accessible London: achieving an inclusive environment (2014)
  - Homes for Londoners: Affordable Housing and Viability SPG (2017)
  - Housing SPG (2016)
  - Planning for Equality and Diversity in London (2007)
  - Play and Informal Recreation (2012)
  - Sustainable Design and Construction (2014).

#### Southwark Council SPDs

52. The following Supplementary Planning Documents issued by the council are material considerations:
- Elephant and Castle SPD/OAPF (2012)
  - 2015 Technical Update to the council's Residential Design Standards SPD 2011 (2015)
  - Affordable Housing SPD (2008)
  - Draft Affordable Housing SPD (2011)
  - Sustainability Assessment SPD (2009)
  - Sustainable Design and Construction SPD (2009)
  - Sustainable Transport SPD (2010)
  - Section 106 Planning Obligations and CIL SPD (2015).

#### **Emerging planning policy**

Draft New London Plan

53. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2 March 2018. A range of consultation responses were received to the draft policies from London councils, individuals, businesses, campaign groups, government bodies etc. Minor suggested changes to the plan were published on 13 August 2018. The Examination in Public (EIP) took place between January and May 2019. The Mayor then published an updated version of the New London Plan, the 'Consolidated Suggested Changes Version July 2019', which includes all the Mayor's suggested changes to the Plan. The Inspector's report was published on 8 October 2019. The Mayor published the 'Intend to Publish' version of the London Plan in December 2019.
54. Due to the stage it has reached, just before its adoption, the New London Plan can be given weight in decision making, and it is noted that the GLA when commenting upon referable applications does accord substantial weight to many of the emerging policies. The following policies are relevant to this proposal:
- GG1: Building strong and inclusive communities
  - GG2: Making the best use of land
  - GG3: Creating a healthy city
  - GG4: Delivering the homes Londoners need
  - GG5: Growing a good economy
  - GG6: Increasing efficiency and resilience
  - SD1: Opportunity Areas
  - SD4: The Central Activities Zone
  - SD5: Offices, other strategic functions and residential development in the CAZ
  - SD6: Town centres and high streets
  - SD10: Strategic and local regeneration
  - D1: London's form, character and capacity for growth
  - D2: Infrastructure requirements for sustainable densities
  - D3: Optimising site capacity through the design-led approach
  - D4: Delivering good design
  - D5: Inclusive design
  - D6: Housing quality and standards
  - D7: Accessible housing
  - D8: Public realm
  - D9: Tall buildings
  - D11: Safety, security and resilience to emergency
  - D12: Fire safety
  - D14: Noise
  - H1: Increasing housing supply
  - H4: Delivering affordable housing
  - H6: Affordable housing tenure
  - H10: Housing size mix
  - S1: Developing London's social infrastructure
  - S4: Play and informal recreation
  - E9: Retail, markets and hot food takeaways
  - E11: Skills and opportunities for all
  - HC1: Heritage conservation and growth
  - HC3: Strategic and local views
  - HC4: London View Management Framework
  - G1: Green infrastructure
  - G5: Urban greening
  - G6: Biodiversity and access to nature
  - G7: Trees and woodlands



SI1: Improving air quality  
 SI2: Minimising greenhouse gas emissions  
 SI5: Water infrastructure  
 SI12: Flood risk management  
 SI13: Sustainable drainage  
 T1: Strategic approach to transport  
 T2: Healthy streets  
 T3: Transport capacity, connectivity and safeguarding  
 T4: Assessing and mitigating transport impacts  
 T5: Cycling  
 T6: Car parking  
 T6.1: Residential parking  
 T6.3: Retail parking  
 T6.4: Hotel and leisure uses parking  
 T6.5: Non-residential disabled person parking  
 T7: Deliveries, servicing and construction  
 T9: Funding transport infrastructure through planning.

### Draft New Southwark Plan

55. For the last five 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. The consultation on the 'New Southwark Plan Proposed Submission Version: Amended Policies January 2019' was completed on 17<sup>th</sup> May 2019. The 'New Southwark Plan 2019 to 2034 Submission Version (January 2020)' was submitted to the Inspectorate on 16<sup>th</sup> January 2020. It is anticipated that the NSP will be adopted in 2020 following an Examination in Public (EIP).
56. Plot H7 is within the alignment of the new borough view 3 'the linear view of St Paul's Cathedral along Camberwell Road' in the New Southwark Plan.
57. Paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging development plans according to the stage of preparation, the extent to which there are unresolved objections to the policy and the degree of consistency with the NPPF. As the NSP is not yet adopted policy, it cannot be attributed full weight as a whole, but individual policies can be given weight (as set out below).
58. The evidence base to support the NSP is substantially complete. The NPPF states that the more advanced the preparation of the plan, the more weight can be given. The NSP has been subject to six rounds of consultation and comprehensive consultation reports have been prepared at each stage in response to representations. The council received 332 representations to the Proposed Submission Version (2017) and as a result some policies were amended and further consultation took place in 2019. The council received 131 representations to the Amended Policies consultation. A full consultation report incorporating comments from both stages of the Regulation 19 consultation was prepared alongside Submission. The council is meeting various community planning interest groups, as well as preparing Statements of Common Ground with individuals and organisations who will be taking an active part in the EIP.
59. In response to the various rounds of consultation on the NSP, a variety of comments and objections were received from individuals, groups and businesses. Where no objections were received a draft policy can be given more weight than for policies (where objections were received and have not been resolved), particularly where there is little change from current adopted policies. For example, the following NSP policies can be given moderate

weight as no objections were received or they are very similar to policies in the development plan:

- P12 Design of places
- P13 Design quality
- P17 Efficient use of land
- P15 Designing out crime
- P20 Conservation of the historic environment and natural heritage
- P22 Archaeology
- P44 Healthy developments
- P47 Hot food takeaways (objections received from KFC and McDonalds)
- P48 Public transport
- P49 Highway impacts
- P50 Walking
- P51 Cycling
- P53 Car parking (no substantial objections were received, comments related to minimising residential car parking)
- P55 Protection of amenity
- P58 Green infrastructure
- P59 Biodiversity
- P60 Trees
- P61 Reducing waste
- P63 Contaminated land and hazardous substances
- P64 Improving air quality
- P67 Reducing flood risk
- P68 Sustainability standards.

60. Where draft policies are different from the adopted policy (or are completely new policies) and objections were received, the specifics of those objections and the differences from the adopted policy need to be considered for each planning application proposal. For example:

- P21 Borough views – objections from OKR landowners to the Nunhead Cemetery view, and request from GLA for the geometry of two views.
- P27 Access to employment and training – objection relating to the financial burden.
- P34 Town and local centres – objections related to strengthening the policy and the lower threshold.
- P45 Leisure, arts and culture – the objections related to strengthening the policy.
- P46 Community uses – objections related to strengthening the policy.
- P65 Reducing noise pollution and enhancing soundscapes – the agent of change principle in the NPPF must also be considered.

61. Where objections were received to a draft policy and these have not been resolved through revisions, that policy can have only limited weight. In these instances, the degree of change from adopted policy on these topics should also be considered. Examples of these policies include:

- P1 Social rented and intermediate housing – this amends the tenure split in the saved Southwark Plan policy 4.4. The amended policy in 2019 introduced a fast track method for schemes at 40% affordable housing, to link to the New London Plan.
- P2 New family homes – changes the housing mix from those in Core Strategy Strategic Policy 7.
- P14 Residential design – objections received to the earlier version of this policy titled P9 Optimising the delivery of new homes. The changes made in the 2019 version

- relate to the removal of the density matrix in line with the draft New London Plan.
  - P16 Tall buildings – this updates saved policy 3.20 of the Southwark Plan. Objections were received to the lack of a definition of a tall building and locations of tall buildings. This was amended in the January 2019 version.
  - P54 Parking standards for disabled people and mobility impaired people.
  - P69 Energy – objections that the December 2017 version P62 was too onerous for carbon reductions.
62. The NSP responds positively to the NPPF, by incorporating area visions, development management policies and 82 site allocations which plan for the long term delivery of housing. The NSP responds to rapid change which is occurring in Southwark and London as a whole, and responds positively to the changing context of the emerging New London Plan.
63. In line with paragraph 48 of the NPPF, as both the New London Plan and the New Southwark Plan are at an advanced stage of preparation (the New London Plan further progressed) both can be afforded some material weight and this is detailed in the report where relevant to particular policy issues in the consideration of this application.

### **Consultation**

64. Details of consultation undertaken in respect of this application are set out in paragraph 280 onwards below and Appendices 1 and 2.
65. Statutory consultation was undertaken on the proposed development including neighbour letters, sites notices and a press notice in Southwark News. The applicant undertook community engagement on the proposal prior to the submission of the planning application. A consultation engagement summary was submitted to support the application to this effect. Further information can be found in paragraph 277 below.

### Summary of consultation responses

66. 26 objections were received. Most of these objections use the same wording from a template provided on the 35% Campaign's website. All the objections were in relation to the affordable housing provision across Elephant Park, rather than to the detail of the Plot H7 reserved matters. These objections are summarised as:
- While Lendlease will fulfil its 25% affordable housing obligation it intends to do so by delivering fewer affordable homes than the 2013 Planning Committee were told would be delivered (541 affordable homes instead of 570).
  - Lendlease has been allowed to build 220 more units than the original maximum unit number, without any improvement in the affordable housing.
  - This application must be decided by Committee to ask why we are getting fewer affordable housing units even though Lendlease were allowed to build more units.
  - There have been no viability assessments or reviews since 2013 to reflect the increase in density.
  - Permission should be refused unless the total number of affordable homes is increased to 570 plus 25% of the additional 220 units, i.e. 84 more affordable homes half of which must be social rented.
  - The need for social rented units.
  - 35% affordable housing should be required.
67. The affordable housing and reconciliation across Elephant Park are covered in detail in the remainder of this report.

## ASSESSMENT

### Principle of the proposed development in terms of land uses

68. The London Plan and Core Strategy identify the Elephant and Castle Opportunity Area (within the Central Activities Zone) as a location where significant levels of growth can be accommodated, contributing to London's need for housing, commercial and other development. The redevelopment of the former Heygate Estate with a vibrant new quarter, known as Elephant Park, is a key part of the overall vision for the Elephant and Castle; this is set out in the council's Elephant and Castle SPD/OAPF. The SPD expects the redevelopment of the former Heygate Estate to provide approximately 2,500 new homes, a range of non-residential uses, with a new park, and should be of the highest design quality to create a sense of place.
69. The 2013 outline planning permission (OPP) approved the comprehensive redevelopment of the site for homes, retail, business, leisure and community uses, a new park as well as extensive areas of new public realm. The principle of high density mixed used development on the site was established by the OPP. The first two phases MP1 and MP2 of Elephant Park are complete and occupied, the third phase MP3 is nearing completion, and work has just started on MP4.
70. Plot H7 forms the first part of the final MP5 phase near the centre of the OPP site. The Design Strategy Document (DSD) approved as part of the OPP divides Elephant Park into five character areas, with the plot forming part of the Park Character Area and overlapping with the Walworth Road and Walworth Local Character Areas. The design of the proposal responds to these three character areas (set out in detail in the Design section below):
- The Park Character Area comprises the new significant public open space and is defined by the park's quality, arrangement and transition in use. The key objectives for the Park Character Area include the quality and arrangement of the public space and a built environment which responds to the significance of the public realm with a clear typology.
  - The Walworth Local Character Area extends between Heygate Street and Wansey Street to the south. It is a transition area from the retail and park frontages, to the residential connections and lower-rise residential buildings. For Heygate Street a building typology is proposed to reflect the formality of the tree-lined environment with a more consistent building line.
  - The Walworth Road Character Area includes the eastern side of Walworth Road (as the key primary approach and a tree-lined high street environment) and the new central shopping street (with smaller local and independent commercial premises and residential above).
71. The OPP approved a range of uses for Plot H7; each of the proposed uses in this RMA is considered below:
- Housing*
72. Class C3 use was approved by the OPP for this plot for the ground and upper floors, and so residential development is expected in this central part of Elephant Park. The 424 dwellings proposed would make an important contribution towards the borough's housing targets of the London Plan and Core Strategy.

*Non-residential uses*

73. The plot is within the Central Activities Zone and designated Elephant and Castle major town centre. The OPP approved in principle a range of non-residential uses Classes A1-A5, B1, D1 and D2 for the ground, mezzanine and basement levels of Plot H7. The uses now proposed are in line with the range approved by the OPP (including all the approved uses, except for Class B1) and are appropriate for the Walworth Road and Park Character Areas.
74. The retail units on the western side of the plot, for which a range of Class A1-A5 uses is sought, would provide the eastern side of the main shopping street, Sayer Street, and face the retail units at the ground floor of Plot H2. The provision of these units as Class A use is welcomed as they would complete a key feature of the Walworth Road Character Area.
75. A large retail unit A1-A5 is proposed on the northern side of the plot, next to the tower's residential entrance and the park. Two smaller retail units fronting on the park and another two units on Heygate Street are shown as A1-A5, D1 or D2 use to allow flexibility in the occupier. These uses are acceptable and would be appropriate in this central location.
76. Each proposed use is appropriate for the plot. The floor area of the uses in Plot H7 would contribute towards exceeding the minimum floor areas of residential, retail, leisure and community uses required by the OPP, and sits within the maximum floor area approved by the OPP. The reconciliation with the OPP is considered further below.
77. A planning obligation in the section 106 agreement associated with the OPP requires 10% affordable retail space across the Elephant Park redevelopment. The submitted Affordable Retail Unit Strategy suggests that the smaller retail units in Plot H7 on Sayer Street may be provided as affordable retail units (along with those in Plot H2 and the future park pavilion) to focus the affordable retail provision on Sayer Street as the main shopping street alongside mainstream retailers. The submitted Strategy indicates how the site-wide 10% provision can be achieved, and further details and discussions are on-going with the Local Economy Team prior to units being occupied.
78. A condition is proposed to require the ground floor layout to be submitted for approval prior to work commencing to confirm the number and size of individual units. Details of the shopfronts and entrances is required by condition 51 of the OPP prior to above grade works so is already secured elsewhere in the OPP.
79. The proposed uses would contribute towards the key objectives for the character areas envisaged by the OPP for this plot (the Park, Walworth Road and Walworth Local Character Areas), and the wider policy objectives for the Elephant and Castle, of which the Elephant Park masterplan would form a key part. The Plot H7 RMA proposal is consistent with the OPP's parameters and principles, and is supported in this regard.

**Conformity with the outline planning permission**

80. Condition 17 of the OPP requires evidence to be submitted with each RMA demonstrating how it complies with the site wide development controls set at the outline stage (i.e. the approved Parameter Plans, Development Specification and Design Strategy Document), as well Site Wide Strategies and Plot Specific Strategies that have since been approved pursuant to obligations contained within the 2013 section 106 agreement.

81. Since the 2013 OPP, a series of non-material amendments have been made to the outline permission, usually to make small changes for an individual plot. For Plot H7, as summarised in the Planning History section of the report above, the council has recently agreed non-material amendments by ref. 19/AP/0952. The agreed changes include:
- to the extent of the podium (so that it covers the full plot rather than only part) and the height of the podium;
  - to the maximum plot component extents to allow balcony projections into the central podium courtyard, and;
  - to the maximum height of the blocks and tower to allow localised breaches for lift overruns, parapet heights and projections in the crown of the tower.
82. The approved Parameter Plans and Development Specification for Plot H7 set a minimum floor area of 28,160sqm GEA, and maximum of 45,131sqm GEA. The approved uses at ground, mezzanine and basement levels were Class A1-A5, B1, C3, D1 and D2, and Class C3 for the upper levels. The plot heights were set with minimum heights to four different parts of the plot (of 24.45m to 66.7m for a tower) and maximum heights (of 35.45m to 86.75m for a tower) and the central podium.
83. The submitted details in the current RMA are in accordance with this recent NMA for Plot H7.
84. A Reconciliation Statement and an updated Addendum have been provided with this application to demonstrate how Plot H7 is in compliance with the controls in the OPP (as amended by the NMAs). The table below summarises the design controls set by the OPP and the assessment of the Plot H7 proposal:

Table 1 – Conformity with OPP restrictions

Key data	OPP requirement	OPP document reference	Plot H7 assessment
Plot extent	Plot extents to be within the maximum and minimum parameters at ground/mezzanine and upper floors	Approved Parameter Plans P03 and P04 (as amended by the recent NMA for the plot)	The footprint of the building fits within the parameter extents as defined by the Parameter Plans and recent NMA.
% occupancy of plot	Total area of built footprint including balcony/amenity zones will be a maximum of 72% of the maximum plot's extent at upper levels	DSD (Consolidated February 2013 Version) Parameter Plan P04 (as amended)	Plot comfortably within the maximum % occupancy at 53.5%
% occupancy of tall building	Maximum floorplate area (including balconies) = 85% of maximum plot extent And - Maximum volumetric occupancy (including balconies) = 85% of maximum parameter envelope volume	DSD (Consolidated February 2013 Version)	% occupancy is below the two maximum % occupancy limits:  - The tall building occupies 64% of the maximum parameter tall building plot extent, and - 64% of the maximum envelope volume
Building envelopes	Plot extents within maximum and minimum AOD	Parameter Plans P08 and P09 (as amended)	Plot H7's heights are within the defined maximum and minimum parameter range,

	heights at ground / mezzanine and upper levels		with the NMA agreeing the slight increases for the lift over runs etc.
Development GEA	Development floor space (GEA sqm) set by a maximum and minimum quantum per plot	Development Specification (October 2018 as an amendment to the September 2013 version), Table 4.2: Plot H7 28,160 minimum GEA to 45,131sqm maximum GEA	Plot H7 complies at 44,303sqm GEA, and so is between the minimum and maximum area.

85. The reconciliation statement takes account of the cumulative delivery of the Plot H7 proposal with the known designs of the previously approved phase MP1, MP2, MP3 and MP4 developments and a potential development scenario of Plot H1 as the final plot, in order to show how the Plot H7 proposal can be reconciled with the approved site-wide controls. In this way it is possible to see if there are any implications arising from the proposal that may affect the on-going delivery of the masterplan's requirements.
86. Condition 17 of the OPP identifies the principal areas of reconciliation where information is required at each reserved matters stage relating to the delivery of:
- 1) number and mix of residential units
  - 2) affordable housing quantum, location and mix
  - 3) land use floor space and distribution
  - 4) open space provision
  - 5) car parking, motorcycle parking, and cycle parking
  - 6) transport/highway works provision
  - 7) utilities.
87. Taking each of these topics in turn, the submitted Reconciliation Statement successfully addresses these requirements and shows how Plot H7 would successfully comply and contribute to the site-wide requirements and restrictions.
- 1) Number and mix of residential units
88. Of a maximum residential floor area of 254,400sqm GEA approved by the OPP across the masterplan, the plots approved to date plus Plot H7 would total 251,688sqm of residential floor area, leaving 2,712sqm remaining. Lendlease intends Plot H1 to be a completely commercial building with no residential element. In this respect, the fact that Plot H7 and the earlier phases use almost all the approved residential floor area is acceptable.
89. As the final plot to contain residential units, the Reconciliation Statement can show the known unit mix and affordable housing quantum is to be achieved across Elephant Park to meet the requirements of the OPP.
90. The total number of residential units would be 2,689, providing a total of 8,133 habitable rooms. The wheelchair accessible units across the Elephant Park site provide a total of 855 habitable rooms, representing 10.5% of the development.
91. The OPP sets a maximum of 5% studios, a minimum of 60% two- and three-bedrooms and minimum 10% three-bedrooms across the masterplan. With Plot H7 and the

approved earlier phases, there would be:

- a total of 134 studios, which is 4.98% of the site-wide total and just below the maximum 5%;
- a total of 1,619 2- and 3-bedroom units, which is 60.2% of the site-wide total and above the minimum 60% requirement;
- a total of 276 3-bedroom units, which is 10.2% of the site-wide total and above the minimum 10% requirement.

## 2) Affordable housing

92. The provision of the 25% affordable housing was staged into cumulative delivery milestones of 400, 800, 1,200, 1,600, 2,000 units and on completion. Phase MP4 triggered the 2,000 unit milestone and the site-wide provision in the first four phases was found to be compliant. Plot H7 is the completion of the residential part of the development, and so the final milestone is applicable.
93. This is set out in more detail in the Affordable Housing section below, but in summary Plot H7 itself provides 20.6% affordable housing by habitable room. It would provide 72 affordable homes, which would increase the site-wide total to 541 affordable homes. In terms of habitable rooms, Plot H7 would add 248 affordable habitable rooms to give a site wide total of 1,987 habitable rooms in affordable units. This achieves and exceeds the 25% affordable housing provision across the Elephant Park development (when applying the “discount” of one habitable room for each affordable wheelchair unit provided allowed for within the section 106 agreement).
94. The section 106 agreement set the tenure split of the affordable units at the different milestones, and the minimum and maximum target percentage provision (by habitable room) of rented three-bedroom units: at completion of the masterplan 50% of the affordable units are to be rented and 50% to be shared ownership, and a maximum of 18% of the habitable rooms are to be within three-bedroom rented units. The rented accommodation is on the basis of social rent levels for three- and four-bedroom units, and at affordable rent levels for one- and two-bedroom units (at no more than 50% of market rent).
95. The tenure split of the affordable housing units across Elephant Park with this final residential plot would accord with the section 106 agreement requirement at 50.5% rented and 49.5% shared ownership, with a slightly higher percentage on the rented side. This complies with the requirement in the section 106 agreement that “*no more than 50% of the said Affordable Housing shall comprise Shared Ownership Units*”. These would contribute towards the site-wide provision of 23.0% of affordable habitable rooms being within social rented units of 3-bedrooms or larger. This exceeds the maximum of 18% set by the section 106 agreement but is a welcome provision given the significant need for family sized social rent units in the borough.

## 3) Land use floor space

96. The OPP set minimum and maximum floor areas for different uses. Plot H7 would contribute towards these figures, while ensuring the cumulative development does not exceed the site wide totals, as follows:



Table 2 – Confirming with OPP floor areas per use

Use Class	OPP minimum floor area (sqm GEA)	OPP maximum floor area (sqm GEA)	Plot H7 (sqm GEA)	Cumulative (sqm GEA)	OPP minimum achieved	Remaining floor area from the maximum (sqm GEA)
C3 residential	160,579	254,400	39,956	251,688	Yes	2,712
A1-A5 - retail	10,000	16,750	1,608	10,025	Yes	6,725
B1 business	2,000	5,000	0	1,330	No	3,670
D1 community	1,000	5,000	0	1,550	Yes	3,450
D2 – leisure	1,000	5,000	257	1,111	Yes	3,889
Sui generis (energy centre)	500	925	0	787	Yes	138
Sub total for uses	175,079	287,075	41,821	266,491	Yes	20,584
Parking, servicing, plant and storage	34,854	43,666	2,482	17,759	No	17,095
Total	209,933	330,741		284,250	Yes	37,679

97. This table shows that the floor areas for all the uses in Plot H7 can be accommodated within the remaining floor areas across the Elephant Park site. It also shows that all the minimum areas have been achieved except for office (which is to be provided in the future Plot H1 proposal), and the area of ancillary parking, servicing and plant, as the basement car parks in the OPP have not all been necessary. This is considered acceptable (and detailed further below) as sufficient parking and servicing areas have been incorporated. The park pavilion has yet to be submitted, and would likely propose retail and potentially community or leisure space as well.

#### 4) Open space provision

98. The OPP requires a minimum of 4.3 hectares of accessible public realm. Plot H7 would contribute 0.24 hectares towards this site wide total by providing public space around each façade of the building. The cumulative total of public realm is 4.796 hectares across the approved plots, this Plot H7 RMA, and the current RMA for the permanent arrangement of the park (under consideration in ref. 19/AP/5787). This site-wide figure already exceeds the minimum of 4.3 hectares and would be further increased when the details for the final Plot H1 come forward.

99. There were no trees due to be retained on Plot H7 in the OPP, and many have already been removed for the construction compound. The proposed tree planting is considered in the Trees and landscaping section later in this report. The play space provision within the plot is considered later in this report.

#### 5) Car parking, motorcycle parking, and cycle parking

100. The OPP set a maximum of 616 on-plot car parking spaces and 62 on-street car parking spaces. Plot H7 includes only two parking spaces on-plot which would bring the site wide total to 186 spaces, and no on-street car parking spaces (leaving the site wide total at 7

spaces), far below the maximum. No motor cycle spaces are proposed so the site-wide total remains at 23 spaces. Cycle parking provision would be made in line with the ratio per land use set by the OPP. While the minimum area of ancillary parking and servicing floor space has not been provided, these types of spaces do not directly contribute to the success of the Elephant Park masterplan. The basement car parks allowed for in the OPP have not been progressed in phases MP3, MP4 and this Plot, but the ground level servicing and parking arrangements have been found acceptable instead. See the Transport section of the assessment below for further detail.

#### 6) Transport and highways

101. Highways works including the plot's servicing yard entrance, carriageway works and road markings on Heygate Street have been shown indicatively and would be progressed through the s278 discussions with the Highways team. See the Transport section of the assessment below.

#### 7) Utilities

102. Plot H7 would connect into the utilities infrastructure that is being provided as part of the Elephant Park redevelopment, and the various utilities would run beneath the public realm around the plot.

#### *Conclusion on compliance with the OPP*

103. The proposed uses, tenure, and floorspace of Plot H7 contribute towards achieving the site-wide requirements of the OPP, especially in terms of the residential elements as the last plot that will contain residential use. The Reconciliation Statement Addendum is considered acceptable and satisfies the requirements of condition 17 for the further phase of the OPP masterplan. Further information on the affordable housing element is contained in a later assessment topic section.

#### **Environmental impact assessment**

104. The 2012 outline planning application was accompanied by an Environmental Statement (ES), and a later ES Addendum. The ES assessed the likely significant environmental impacts arising from the entire Elephant Park redevelopment during the demolition, construction and operational phases. The necessary mitigation measures were identified to minimise the predicted adverse impacts as far as possible, and these were secured by conditions and planning obligations as part of the OPP.
105. This RMA application for Plot H7 as part of the wider redevelopment approved by the OPP is a "subsequent application" for the purpose of the EIA Regulations. The council issued a formal screening opinion (ref. 19/AP/0026) on 24 January 2019 which concluded that developed design of Plot H7 would not result in any new or previously unidentified impacts that would warrant an additional EIA to be undertaken. Therefore a supplemental ES was not required for this RMA application, and the supporting documents provide additional technical information such as the daylight, sunlight and overshadowing assessment, a wind assessment, air quality assessment, and flood risk assessment.

#### **Density and dwelling mix**

106. Core Strategy Policy 5 sets a density range of between 650 to 1,100 habitable rooms per hectare (hr/ha) within the Central Activities Zone (CAZ). Densities may be exceeded in Opportunity Areas when developments are of an exemplary standard of design. At the outline application stage, an indicative site-wide density of 1,054 hr/ha was achieved

based on an assumption of 9,052 habitable rooms in 2,469 residential units across Elephant Park as the maximum residential element.

107. The Plot H7 proposal contains 1,152 habitable rooms in the proposed 424 flats, plus resident amenity rooms and the 1,680sqm of commercial floorspace (equivalent to another 65 habitable rooms) which results in a total of 1,217 habitable rooms overall. The density for this mixed use plot is 1,601 hr/ha which sits above the maximum density range for the CAZ. The proposal therefore needs to demonstrate that the residential accommodation is of an exemplary standard in accordance with the criteria set out in the Residential Design Standards SPD. This is considered further in the “Quality of residential accommodation” and “Design” sections below.
108. The density for this plot is above the indicative site-wide density established in the OPP, although it is noted that the earlier plots that have had their RMAs approved have varying densities, such as Plot H10 (924 hr/ha), Plot H3 (931hr/ha), Plot H4 (1,176 hr/ha), Plot H5 (1,640 hr/ha), Plot H11A (1,500 hr/ha) and Plot H11B (1,533 hr/ha). The proposed density of Plot H7 when viewed within the context of these other plot densities would be appropriate in principle for a development within the CAZ, and an Opportunity Area with an excellent PTAL. The proposal would maximise the potential of this brownfield site, which is one of the indicators of an exemplary design standard.
109. London Plan Policy 3.8 requires new developments to offer a range of housing choices in terms of the mix of housing sizes and types. Core Strategy Policy 7 requires major development in the Elephant and Castle Opportunity Area to have at least 60% of units with two- or more bedrooms and 10% of homes to have three-, four- or five-bedrooms. No more than 5% of units should be studio flats. The OPP also sets unit mix restrictions.
110. Plot H7 would have the following mix:

Table 3 – residential mix

Unit size	Number of homes	Percentage of homes
Studio	19	4.5%
1-bedroom	140	33.0%
2-bedroom	223	52.6%
3-bedroom	42	10.0%
4-bedroom	0	0%
Totals	424	100%

111. Plot H7 would not exceed the 5% maximum of studios set by the OPP, would achieve the 10% minimum of three+ bedrooms and exceeds the 60% minimum of two- and three-bedroom homes. As set out in the Reconciliation section above, the site-wide housing mix complies with the OPP restrictions.
112. The density is acceptable in principle for this plot, and the dwelling mix meets the requirements of the OPP for this plot and fits in with the site-wide requirements as the last residential phase of Elephant Park.

### **Affordable housing**

113. The 2013 section 106 agreement associated with the OPP requires 25% affordable housing to be provided across the Elephant Park development. This is to be calculated

on a habitable room basis. The tenure split is set at 50% rent and 50% shared ownership tenure across Elephant Park; the rented units are to be made available as social rented housing for three-bedroom units or larger, and at affordable rent levels for one- or two-bedroom units (i.e. the size of the unit determined the type of affordable product). Appendix 4 of the section 106 agreement sets the milestones per 400 completed homes and the associated proportion of affordable housing, the tenure mix, and the minimum and maximum percentage of 3-bedroom units at social rent levels to be achieved. This was to ensure a relatively even delivery of affordable housing across the phases of Elephant Park, but does not require each plot to provide affordable housing nor 25% affordable housing.

114. As Plot H7 would be the last residential plot, the site-wide “completion” milestone is the relevant stage. Appendix 4 of the section 106 agreement requires 25% affordable housing (by habitable room) on completion, with a tenure mix of 50% rented and 50% shared ownership for the affordable housing, and a maximum of 18% of affordable habitable rooms within 3-bedroom social rent units.
115. The objections received to this RMA for Plot H7 are in relation to the affordable housing provision in terms of a percentage and number of affordable units (particularly with the additional 220 units above the “maximum number” of the OPP) and the number of social rent units being provided.
116. In terms of this plot alone, Plot H7 proposes 424 homes and 1203 habitable rooms (counting any habitable room over 27.5sqm as two habitable rooms), of which 72 homes would be affordable (containing 248 habitable rooms). This equates to 17% affordable housing by unit and 20.6% by habitable room.

Table 4 – Tenure split by unit in Plot H7:

Unit size	No. of social/ affordable rent units	No. of intermediate (shared ownership) units	Total affordable units
Studio	0	0	0
1-bedroom	11	10	21
2-bedroom	9	18	27
3-bedroom	15	9	24
Total	35	37	<b>72</b>

Table 5 – Tenure split by habitable room in Plot H7:

Tenure	No. of habitable rooms	Percentage
Affordable/social rent	125	10.4%
Shared ownership	123	10.2%
Private	955	79.4%
Total	1203	100%

117. The affordable homes are within block B (rented and shared ownership) and part of block C would contain further shared ownership units alongside market ones. These would be accessed from two communal entrances on Heygate Street and from the podium garden

(which will be shared by all residents of Plot H7). The design quality of these homes and blocks are the same as for the private units (detailed further below in the Quality of Accommodation section).

118. While the provision within Plot H7 is below the 25% site-wide figure, the cumulative totals of the affordable housing and market housing provided in earlier phases MP1, MP2, MP3 and MP4 must also be considered for this final residential phase.

*Site-wide affordable housing provision*

119. The provision of affordable housing within Plot H7 would bring the site-wide cumulative totals of all residential plots to 541 affordable homes out of a total of 2,689 (as 20.1% of the units). However, it is the habitable room calculation that is the key metric.
120. With a total of 2,689 homes containing 8,142 habitable rooms across Elephant Park, a 25% provision would be 2,036 habitable rooms. As 106 x affordable wheelchair accessible units are to be provided, 106 fewer affordable habitable rooms can be provided while still being compliant (in accordance with saved policy 4.5 of the Southwark Plan and as specifically stated in the 2013 section 106 agreement). Therefore the target number is 1,930 affordable habitable rooms to achieve the 25% requirement of the OPP.
121. Across Elephant Park 1,988 affordable habitable rooms are due to be provided – i.e. 58 rooms in excess of the target number. The site-wide 25% affordable provision will be achieved and exceeded, which is strongly supported. Of these affordable homes, 50.5% are to be rented and 49.5% as shared ownership. While this is slightly out from the 50/50 split required by the Affordable Housing Framework in the section 106 agreement, it accords with the restriction in Schedule 3 that no more than 50% of the affordable housing be shared ownership. The slight over provision of rented is supported particularly as the provision of family sized social rented units is higher than required.
122. The final element of housing that needs to be checked is the provision of three-bedroom (or larger) social rented units. Again this is done on a habitable room basis. The OPP sets, on completion of Elephant Park, the provision of three-bedroom (or larger) social rented units within the total affordable housing provision at a maximum of 18% (i.e. up to 18% of the habitable rooms within the affordable housing can be contained within three-bedroom units).
123. The 15 x three-bedroom social rent units in Plot H7 would contain 75 habitable rooms. These would result in a cumulative total of 461 habitable rooms within three-bedroom social rented units in the residential plots of Elephant Park. This represents 23% of the 1,988 affordable habitable rooms, and is above the 18% maximum set by the OPP. However social rented, family sized units are the type of housing most in demand in the borough. The exceedance above the maximum percentage by 103 habitable rooms is in this case a much-welcomed over-provision from the 2013 section 106 agreement's limit.
124. The Plot H7 proposal as part of MP5 and the final residential plot to complete the affordable housing provision across Elephant Park is acceptable. It fully accords with and exceeds the requirements set out in the 2013 section 106 agreement associated with the OPP.

*Objections received to the affordable housing*

125. The objections received refer to the number of affordable homes being provided being lower than the number reported to Committee in their consideration of the 2012 outline application. The 2013 Committee report included estimates of the number of affordable

units in the minimum residential scenario (of at least 511 homes to reprovide the demolished Heygate Estate along with the off-site locations), and maximum residential scenario (570 homes) which was used for the indicative masterplan. The indicative masterplan was one suggested iteration of how the parameters and design guidance could be interpreted and progressed, but was not a definitive proposal. Table 1 of the 2013 Committee report is clear that the affordable housing is to be based upon the percentage of habitable rooms rather than units, and the report was clear that the precise mix of unit sizes within the affordable housing will be determined by the RMAs for the plots. As the RMAs have been submitted for 11 plots, the exact number and habitable rooms are known, and now the full position across Elephant Park is clear for the residential element.

126. The objections also refer to the site-wide number of units resulting from the 424 homes proposed in Plot H7 being 220 more than the maximum number stated in the proposal description of the OPP. In 2018, Lendlease submitted a non-material amendment (NMA) application ref. 18/AP/3225 which sought to change the description of the OPP development, so that it referred to the range of residential floorspace approved, instead of a minimum and maximum number of units. The two relevant parts of the NMA's description wording are underlined below for comparison:

*Non-material amendment to outline planning permission ref. 12/AP/1092 for:*

*Redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 2,300 (min) and 2,469 (max) residential units together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works in order to:*

*- Amend the description of development to: "Outline application for: Redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 160,579sqm GEA (min) and 254,400sqm GEA (max) residential floorspace together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access other associated works."*

*- To amend condition 2 part b to cross-refer to the approved plans and documents listed at condition 6.*

*- To submit an amended Development Specification (October 2018) and amend condition 6 to list the Development Specification (October 2018) as the approved version.*

127. In considering this 2018 NMA application, the officer report noted that a proposal description alone does not define or restrict a development; it sets out what can be carried out as a result of the permission but this does not mean that anything else is prohibited. It is the role of the conditions to a planning permission to identify what cannot be done. The conditions on the OPP list the approved drawings (i.e. the approved parameter plans) and approved documents (such as the Development Specification) which prescribe and define the approved Elephant Park redevelopment. The number of units referred to in the OPP description were not secured nor restricted by a condition, nor restricted by the approved drawings, nor the approved documents. Instead, the approved documents refer to the floorspace minimum and maximum sqm floor space areas for different uses across the site, and per plot, as matched by the massings

allowed by the parameter drawings. The 2012 Environmental Impact Assessment was undertaken on the basis of the floorspace figures, rather than a number of units. It was considered acceptable to change the OPP description to replace the number of units with the approved floorspace of residential use, as an accurate description of the development and in line with the floorspace figures in the approved documents. It better informs the reader as to the scale and type of development approved when read as part of the full description, alongside the other uses and the range of heights approved. The NMA was approved in November 2018.

128. The objections to the Plot H7 RMA suggest that additional affordable homes should be required as 35% of these “additional” 220 units, plus the number reported to Committee in 2013. However, as set out above, the affordable obligation in the OPP requires a fixed 25% affordable housing percentage, calculated on a habitable room basis (not by unit number) which will be achieved and that Plot H7 contributes towards. The number of affordable units is not the key criteria in the legal agreement. It is worth noting however, that Lendlease is due to provide 92 social rented family units across the site, more than the 71 estimated in 2013, which would assist in the meeting the borough’s most pressing housing need. As these larger affordable homes contain more habitable rooms, the overall total unit number of 541 affordable homes is lower than the indicative 570 estimate in the OPP, however the 25% provision is achieved and exceeded.
129. The objections also suggest the viability of Elephant Park should be reviewed with the increase in the number of units. The 25% provision secured in the 2013 OPP was far in excess of the 9.4% affordable housing that was found to be viable at that time. The single viability review obligation in the section 106 agreement would have been triggered only in the event that substantial commencement of the first phase (MP1) had not taken place within two years of the first RMA. As the first phase was implemented promptly, the viability review was not triggered. There is no provision in the 2013 OPP for any other viability review to be required. The council has no mechanism to insist on a viability review with the increased number of units (as the residential floor space is within the maximum area approved), nor a late stage review of the completed scheme.
130. The proposed affordable housing in Plot H7, as part of the wider Elephant Park development and the final residential plot would achieve and exceed the 25% affordable housing provision required by the 2013 section 106 agreement. It is considered acceptable and there is no scope within the terms of the section 106 agreement to require a review, or the delivery of additional affordable housing.

### **Quality of residential accommodation**

131. Development which exceeds the maximum expected density range or includes a tall building is expected to demonstrate an exemplary standard of design. The Residential Design Standards SPD at section 2.2 advises that for a development to be considered as being of an exemplary standard, it will need to demonstrate that it exceeds the residential design standards and includes features such as:
- significantly exceed minimum floor space standards
  - provide for bulk storage
  - include a predominance of dual aspect units
  - exceed the minimum ceiling height of 2.3m
  - have natural light and ventilation in kitchens and bathrooms
  - exceed amenity space standards
  - meets good daylight and sunlight standards
  - have excellent accessibility
  - minimise corridor lengths by having an increase in number of cores

- minimise noise disruption by stacking floors.

The paragraphs below highlight where the proposal achieves these indications of an exemplary design.

*Arrangement and internal space standards*

132. There are seven or eight flats per core in the tower and mansion block which reduces the internal corridor length. The ceiling heights of 2.5m exceed the minimum height of 2.3m required by Building Regulations. These are indications of exemplary residential design.
133. Each flat would have storage space. No bulk store is indicated for residents, although a bulk waste store and an enclosed resident amenity room are shown at ground level, which could be used to provide bulk storage.
134. The Residential Design Standards SPD sets out the minimum internal size standards (which in turn are based on the national prescribed standards). The proposed units all exceed the minimum internal size standard by 0.4sqm to 2.2sqm (for studios and one-bedroom flats) and 0.3sqm to 4.5sqm for larger flats, as set out below.

Table 6 - Unit sizes

<b>Unit size</b>	<b>SPD minimum size (sqm)</b>	<b>Proposed unit size range (sqm)</b>
Studio	37	37.5-40.4
1-bedroom/2 person	50	50.4-52.2
2-bedroom/3 person	61	62.0-65.5 w/c units at 75.0sqm
2-bedroom/4 person	70	70.4-72.8 w/c units at 85.7sqm
3-bedroom/5 person	86	86.3-87.7 w/c units at 110.3-110.4sqm

135. The room sizes meet the minimum areas as set out in Table 2 of the SPD for the bedrooms, living/kitchen/dining rooms, bathrooms, and the separate kitchens and living rooms.
136. The wheelchair units would meet the minimum sizes set out in Table 3 of the SPD. The entrances to the building would have level access and all units in Plot H7 would be accessible by lift (two or three lifts per block). The OPP requires at least 10% of dwellings or habitable rooms across Elephant Park need to be delivered as wheelchair units. The submitted accommodation schedule identifies 31 wheelchair units to be provided out of the 424 total proposed in Plot H7; this represents 7.3% of the dwellings in this plot, or 11.8% of the habitable rooms. Therefore, while it is under-providing in terms of unit number, it is significantly over providing in terms of habitable rooms. The accessibility of the units within Plot H7 would be secured by condition regarding Building Regulations M4(2) and M4(3). Across the Elephant Park, the 10% requirement would be met and exceeded with 10.6% of the habitable rooms in 225 units in the development being within wheelchair units. In this regard, the excellent accessibility of the proposed homes in this plot is in accordance with one of the characteristics of an exemplary residential design quality.



### *Aspect*

137. The Residential Design Standards SPD recommends that developments should have a predominance of dual aspect residential units as an indication of an exemplary design. The GLA's Housing SPG states that:

*“a dual aspect dwelling is defined as one with openable windows on two external walls, which may be either on opposite sides of a dwelling or on adjacent sides of a dwelling where the external walls of a dwelling wrap around the corner of a building (the provision of a bay window does not constitute dual aspect).”*

138. Within each floor of the tower, the four corner units would be considered as dual aspect. The other four units per floor would not be truly dual aspect, as these flats have windows to the living room and bedroom facing the same aspect, and the living rooms would have a secondary window and door in the side wall of the projecting bay; this secondary view would be restricted by the balcony floor and the balcony on the level above. These are considered to be single aspect with an enhanced secondary outlook. In total for the tower, 49.8% would be true dual aspect and 50.2% would be enhanced single aspect. In the two mansion blocks, 39.5% of the units would be dual aspect, 21% single aspect, and 39.5% enhanced single aspect with the bay windows providing a form of secondary outlook.
139. Overall 46% of the units in Plot H7 would be dual aspect, 42% would be enhanced single aspect and 12% would be single aspect. This is not a predominance of dual aspect units, and so the scheme does not achieve this indicator of exemplary design.
140. There is 1 x one-bedroom flat per floor of the tower that would be north facing, with a secondary view provided by the projecting bay window across the balcony. These units would also have an attractive outlook over the park, are sized 1.6sqm larger than the minimum size, exceed the ADF to all habitable rooms to receive good daylight levels, and occupiers would have access to the podium garden, roof terrace and resident amenity rooms. There are 30 x one- and two-bedroom flats on the park facing side of block E would face north-east, and with the bay window projection would be considered as enhanced single aspect units. They would not receive sunlight, but are sized 2-2.8sqm larger than the minimum size, would benefit from the attractive outlook over the park, and have access to the roof terrace (that would receive good sunlight levels). All but one flat would achieve good ADF levels to all habitable rooms, and the first floor flat that does not is 0.1% short of the recommended ADFs. On balance, the quality of these north-facing units as part of the overall quantum of development in this plot and quality of living accommodation with the proposed communal outdoor and indoor amenities, is considered to be acceptable.

### *Privacy and outlook*

141. The Residential Design SPD requires developments to achieve a separation distance of 12m at the front of a building and any elevation that fronts a highway and a minimum of 21m separation at the rear of buildings in order to prevent harmful overlooking between residential units.
142. The proposed flats that face out of the plot would have good outlook and privacy. The windows on the northern side of the plot would face over the park and not raise privacy concerns. Others would face outwards towards the facing windows of Plots H2, H11B and H6. The south facing windows would look over Heygate Street to Plot H6, at a distance of 25m, and so comfortably exceed the minimum 12m separation for the front of buildings. The west facing windows would look over Sayer Street to Plot H2 at a distance

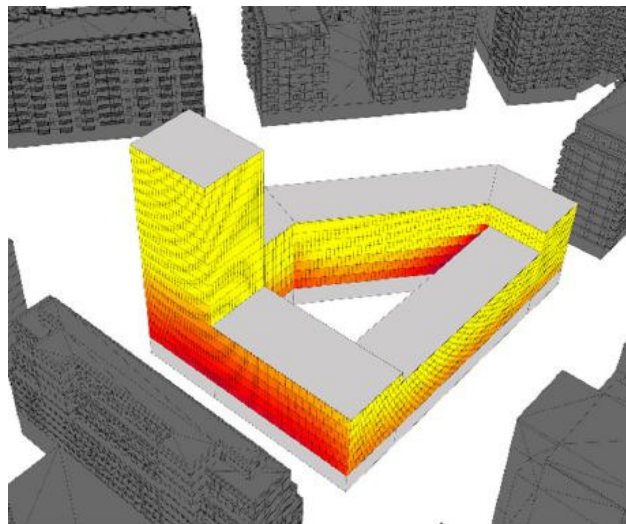
of 12.5m, so achieves the minimum distance.

143. The facing windows on the eastern side would be 13.5m from the approved facing windows of Plot H11B across the new route, except at one point where the proposed bay window projection would be set 11.5m at the very corner. These distances are considered to be acceptable when considering the angled orientation of the blocks.
144. Most of flats that face into the podium courtyard would also have good outlook and privacy. They would face each other across the central garden at distances of between 7m and 50m, and the arrangement of the blocks with the three main sides forming a triangle would limit the number of windows facing square on to each other.
145. The closest arrangements of windows are between the end of block E and the tower (9.4m between windows), the end of block C and the tower (8.3m between windows), and between the ends of blocks A and B; the projecting balconies would reduce these distances. These closest relationships are set out below:
- Between block E and the tower, the facades are angled so the windows would not face square on, and the closest windows are between living rooms which have secondary outlooks.
  - Between block C and the tower, the windows have been arranged so that they are staggered between the living rooms (which benefit from secondary outlooks) to prevent direct views, and the bedroom windows in the tower are set behind the balcony to slightly increase the separation to 10m.
  - Between the western side of block A and the eastern flank of block B, the windows would be 10m from each other. Three of the four units in this arrangement are dual aspect. The windows face across to rooms of the same type (living to living room, bedroom to bedroom) except for one flat where the secondary outlook from a living room in block B would face a bedroom in block A.
146. These arrangements are tighter than the SPD recommends, and in some cases would limit the privacy of particular rooms in certain flats. However, the arrangement of the block is in line with the OPP parameters and the distance between blocks A and B has increased from the indicative arrangement, and the majority of the proposed homes would benefit from good levels of privacy.

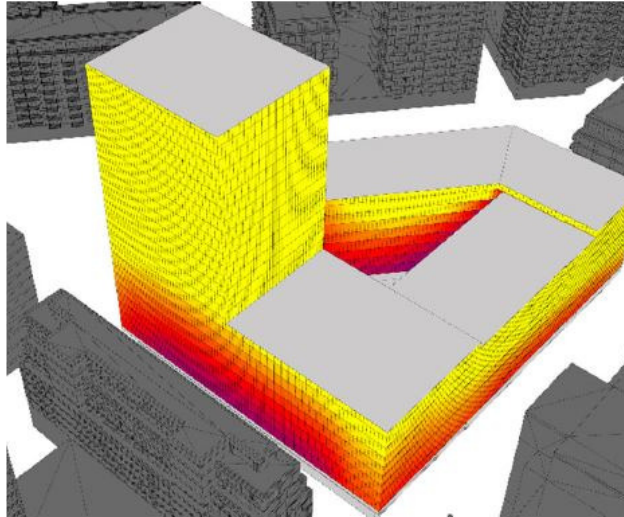
#### *Daylight*

147. The submitted internal daylight, sunlight and overshadowing assessment details the daylight and sunlight levels for the proposed residential units and the communal amenity spaces. It was updated following the revisions made to increase the size of windows, add windows, and shift balconies away from windows.
148. The assessment was prepared in accordance with the BRE Guidance "*Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice*" (2011). It follows on from the assessment within the 2012 ES that detailed the likely light levels within the completed development. The 2012 ES expected Plot H7 to have low daylight levels, particularly to the lower floors, due to the plot's location close to neighbouring plots and the expected massing of development in the masterplan. It recommended further assessment at the detailed design stage when the precise location and scale of individual buildings within the plots and the gaps between buildings were known. With the neighbouring plots now approved and some constructed, the design of Plot H7 has tried to improve daylight levels to the proposed homes in its massing, detailing and layout of the flats.

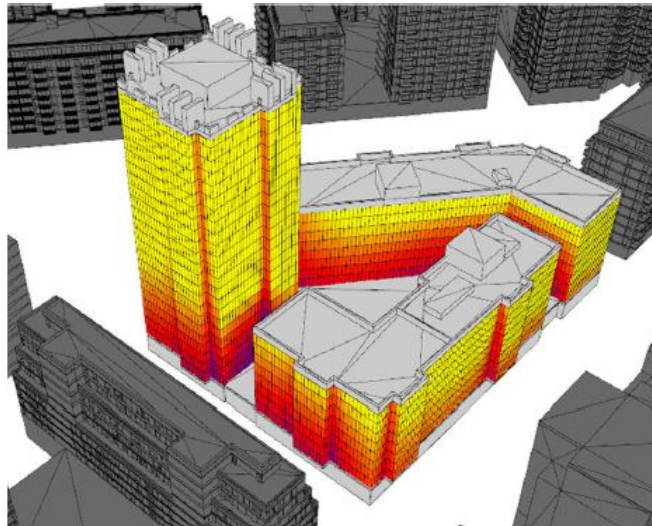
149. All habitable rooms in the proposed flats have been assessed using Average Daylight Factor (ADF), No Sky Line (NSL) and Room Depth Criterion (RDC) methods of assessment:
- The ADF is a detailed calculation used when the internal layout and room use is known and assesses the quality and distribution of light within a room. The BRE guidance advises the following minimum ADF values: 2% for kitchens, 1.5% for living rooms, and 1% for bedrooms.
  - The NSL test establishes where within a room the sky would be visible through the window. The BRE's guidance advises that to guarantee satisfactory daylight uniformity, the area of the room which doesn't receive direct skylight should not exceed 20% of the room's floor area.
  - RDC is measured for single aspect rooms and is the ratio of room depth to window size.
150. The applicant has sought to maximise the daylight availability to the rooms on this constrained plot and made improvements during this application by working on; the massing of the blocks; the layout of the flats (to prioritise daylight to living rooms); the location of the balconies relative to windows; adding and enlarging windows in the amended plans; the façade materials in the courtyard (using lighter brick colour); and flooring materials (lighter veneer for the floorings). Daylight to living rooms has been favoured over daylight to bedrooms as that is likely to be where occupiers spend most of their waking time and most value the daylight.
151. The series of visuals below show how the outline massing has evolved to the detailed scheme, and the resulting VSC levels across the façade from the OPP minimum massing, OPP maximum massing, and current RMA. Yellow indicates a good VSC value, reducing to orange, red and dark red. They show how the VSC values across the Sayer Street façade would be low even in the minimum parameter scenario, due to the proximity of Plot H2.



Visual showing the VSC levels across the facades in the OPP minimum parameters massing (orange, red and dark red being lower VSC values)



Visual showing the VSC levels across the facades in the OPP maximum parameter massing



Visual showing the VSC values across the façade of this RMA submission

152. In the original scheme, 65 of the 424 flats proposed were to have daylight levels to all rooms that were below the recommended ADF level. With the amendments made during the application, 36 more habitable rooms now achieve the relevant ADF. There would now be 57 flats (11 x studios, 34 x one-bedroom, 12 x two-bedroom flats) that have daylight levels to all their rooms below the recommended ADF. If a lower ADF of 1.5% is applied to the combined living/kitchen/dining (LKD) rooms, there are 48 flats at first to seventh floors that have low daylight to all rooms. These flats are distributed across blocks A, C, D and E, mainly affecting market homes and some of the shared ownership flats.

153. The table below sets out the predicted ADF daylight results with the revisions made.

Table 7 - ADF results for the proposed rooms

Room type	Pass ADF	Fail ADF	Total room	Compliance
Living/Kitchen/Dining	210	178	388	54%
Living room	13	4	17	76%
Kitchen	5	11	16	31%
Bedrooms	593	119	712	83%
Studio	8	11	19	42%
<b>Total</b>	<b>829</b>	<b>323</b>	<b>1152</b>	<b>72%</b>

154. The results show that 72% of habitable rooms (829 out of 1152) within the development would meet or exceed the target ADF value for that room type.

155. Of the 323 rooms (28%) that fail:

- The combined living/kitchen/diners have been assessed against the higher ADF of 2% for the kitchen; of the 178 LKDs that fail to achieve 2% ADF, 90 LKDs meet or exceed the 1.5% ADF which is sufficient for a living room and dining room, and another 29 LKDs and living rooms have ADFs of 1.3-1.4% to be slightly below that recommended level. Another 27 living rooms have windows that are obstructed by the balcony above and are on a lower floor facing onto another plot - in these cases the applicant has sought to maximise the size of the windows and offset balconies where possible to improve the daylight levels. The other 39 LKDs have low daylight due to the facing facades and the applicants have tried to locate these rooms in corners to benefit from light from two directions, and enlarge the full height windows to maximise the daylight levels.
- Three of the eleven failing kitchens achieve 1.5%, and the other 8 are affected by the balconies above in units where the living room has been located in the best part for daylight.
- Of the 119 bedrooms failing short, 46 do so by 0.1-0.2% below the recommended ADF. The other bedrooms are in lower floor flats that are affected by the projecting balcony above or the facing façade, and are in units where the living room has been prioritised in the best location for daylight.
- 3 of the 11 failing studios achieve 1.5% ADF which is suitable for a living room and bedroom. The other 8 studios have ADFs of 0.8-1.4%, are located on lower floors (first to fifth) facing into the courtyard and affected by the balconies above or the massing of the other blocks within Plot H7. The applicant investigated moving the balconies further which was found to not improve daylight levels and while removing the balconies would improve the daylight, the applicant considers the private amenity space adds to the quality of these studios.

156. The submitted assessment also compared the ADF levels along the Sayer Street frontage with those of the flats in the facing frontage of Plot H2 that were approved in its RMA. It found that the ADFs of the LKDs in the Plot H2 RMA scheme were 0.4-1.4%, which are similar to the 0.5-1.5% ADF of the Plot H7 flats, and that the bedrooms in Plot H2 were in the range of 0.2-0.7% which are slightly lower than the 0.3-1.5% range in Plot H7 proposed in the current application.

157. In terms of daylight distribution, 764 out of 1,152 (66%) proposed rooms would achieve or exceed the BRE recommendation on NSL. The daylight distribution to living rooms has again been prioritised, with the result that the bedrooms are more affected by balconies

above and the massing of facing facades.

Table 8 - NSL results for the proposed rooms

Room type	Pass NSL	Fail NSL	Total room	Compliance
Living/Kitchen/Dining	281	107	388	72%
Living room	9	8	17	53%
Kitchen	7	9	16	44%
Bedrooms	455	257	712	64%
Studio	12	7	19	64%
<b>Total</b>	764	388	1152	66%

158. While the proposal could not be considered to achieve the exemplary indicator of meeting “good daylight and sunlight standards”, the low daylight levels (particularly on the Sayer Street façade) was an expected result of the OPP and the applicant has taken care to maximise the daylight to the flats as far as possible (and further improved by the changes made during the application).

#### *Sunlight*

159. All living room windows within 90 degrees of due south were assessed for sunlight availability. The BRE’s Annual Probable Sunlight Hours (APSH) test suggests that a window should receive 25% of annual probable sunlight hours during summer and at least 5% of sunlight hours during the winter (21 September and 21 March).
160. The assessment found that 191 out of 261 living rooms tested (73%) would receive good winter and annual sunlight levels. Of the 70 rooms (27%) that do not achieve the BRE guidance levels:
- 22 rooms face west, either onto the flank of block B, or across to Plot H2, which limits their sunlight hours received.
  - 36 rooms are set below projecting balconies and are shaded by facing buildings. Ten of these rooms receive the recommended winter hours (when the sun is low in the sky), but the balconies above shade the window in summer so that they do not achieve the annual hours.
  - Four rooms on the Heygate Street frontage do not receive winter sun due to the massing of Plots H6 and H10 opposite.
  - Eight rooms in lower floors of the tower receive limited sunlight as they face onto block C to the south.
161. For this central plot in the Elephant Park masterplan that is surrounded by similarly sized plots and that is in accordance with the parameters of the OPP, the predicted sunlight levels to the proposed flats are considered acceptable.

#### *Overshadowing*

162. The BRE guidance recommends that an outdoor amenity space should receive at least two hours of sunlight on 21 March to at least half its area.
163. The podium garden would receive limited sunlight in the summer and throughout the year. This was predicted in the 2012 outline application in the minimum massing scenario and maximum massing scenario (where no area would received at least two hours on the 21 March). In this proposed RMA, 5% of the courtyard would receive at least two hours of sunlight, mainly in the area between blocks A and B which has been widened from the

illustrative masterplan. The landscaping, trees and plant species selections have taken into account these low sun levels to ensure the selected plants would still establish and thrive.

164. The three communal roof terraces on blocks B, E and the tower would receive much better sunlight hours, with 83%, 95% and 74% of their areas respectively receiving at least two hours. The three terraces would be accessible to the residents of that block; the affordable housing residents have access to the terrace on block B, market housing residents in the tower having access to its terrace, and those living in the park mansion block A/E having access to the terrace at the top of block E. The communal roof terraces would have good sunlight availability throughout the year, and provide residents with a choice of communal space.

#### *Internal noise*

165. The repeated floorplan of the tower and mansion blocks means that the layouts of the units are stacked which would assist in minimising noise transference, and achieve a further criteria of exemplary design from the Residential Design Standards SPD. Conditions on the OPP require noise test results to be submitted prior to occupation to demonstrate compliance with the noise standards set in the conditions.

#### *Amenity space*

166. Residential development must provide an adequate amount of useable outdoor amenity space in private gardens, balconies, terraces or roof gardens. The Residential Design Standards SPD sets the following standards:
- A minimum 50sqm communal amenity space per development
  - Units of 3 or more bedrooms must have 10sqm of private amenity space
  - Units of 2 bedrooms or less - ideally 10sqm of private amenity space and where this is not possible the remaining amount be added to the communal amenity space total area
  - Balconies and terraces should be a minimum 3sqm to count towards private amenity space
  - 10sqm of play space per child (covering a range of age groups).
167. Each home would have a private amenity space with a balcony or terrace of at least 5.9sqm. The three-bedroom flats would have 10sqm of private space. All residents would have access to the communal garden and the roof terrace for that block.
168. With 424 flats proposed, a minimum of 4,240sqm of private amenity space would be required by the SPD and 200sqm of communal space for the four shared gardens and terraces, totalling 4,440sqm.
169. The private amenity spaces are mainly 5.9sqm, and so there is a shortfall of 1,566sqm of private amenity space that would need to be provided by the communal amenity spaces.
170. A variety of communal garden areas are proposed; the shared podium garden (1,250sqm), a roof terrace (357sqm) at the top of the tower, and two roof terrace to the mansion blocks (165sqm and 381sqm). These communal areas total 2,153sqm and offset the shortfall in private amenity space, and provide the playspace in the shared podium garden for 0 to 5 year olds, in order to address the requirements of the Residential Design Standards SPD. These areas are to incorporate trees, planting, lawn, seating, tables, play features and pergolas.

171. The tower includes a further 248sqm of internal amenity spaces for the residents, with two ground floor rooms (24sqm and 87sqm), two rooms at first floor level (19sqm and 76sqm) and roof room (42sqm). While these spaces do not contribute towards the amenity space requirements, these areas would enhance the facilities for future residents.
172. The amenity space proposed within this plot would exceed the amenity space standards set out in the Residential Design Standards SPD, and is a further indication of an exemplary standard of design.

#### *Playspace*

173. A Site-Wide Play Provision Strategy for Elephant Park was approved pursuant to the OPP legal agreement, and this anticipated the central courtyard of Plot H7 would provide door step play for 0-5 year olds. Details of the play provision for each plot have to be submitted for approval with each RMA. Using the GLA playspace calculator which has been used throughout the RMAs to take account of the tenure and size of units, the Plot H7 proposal would require 740sqm of children's playspace (370sqm for under 5s, 220sqm for 5-11 year olds and 140sqm for 12+ year olds).
174. The podium garden would incorporate 370sqm of doorstep play for 0-5 year olds in two areas (including colourful play features, informal play and lawn area), which would be accessible to all residents.
175. The neighbouring park (to the north-west of the plot) would provide local play for 5-11 year olds (220sqm), as anticipated by the Site-Wide Play Provision Strategy. The OPP's legal agreement also secured s106 monies to be put towards off-site new or enhanced facilities for the 12+ year olds, which Plot H7 would contribute towards.
176. This plot would provide sufficient play space provision on plot, immediately adjacent to the plot and as a financial contribution as part of the site-wide requirements for over 12 year olds.

#### *Conclusion on quality of accommodation*

177. The different elements of residential quality set out above demonstrate how the proposed homes would achieve certain criteria for exemplary residential accommodation, as listed in the Residential Design Standards SPD. While not every unit will achieve every criteria (particularly in terms of daylight levels and dual aspect), this constrained plot would achieve the broader requirements, for example, the stacking of the floor layouts, the accessibility, the ceiling heights and corridor lengths. All units would have private amenity space in addition to the landscaped podium garden, roof gardens and play space. Other exemplary design aspects are highlighted in other sections of the assessment, such as achieving Secured by Design, maximising the potential of the site, and making a positive contribution to the local context. For these reasons, and acknowledging that this is a plot in close proximity to other Elephant Park plots which is line with the OPP, Officers conclude that the quality of the proposed residential accommodation is sufficiently high to justify the density and the tall building on this plot as part of the Elephant Park masterplan.

#### **Impact on the amenities of occupiers of adjoining properties**

178. Saved policy 3.2 of the Southwark Plan states that planning permission will not be granted where a proposal would cause a loss of amenity, including disturbance from



noise, to present and future occupiers in the surrounding area or on the application site. Strategic Policy 13 of the Core Strategy requires developments to avoid amenity and environmental problems that affect how we enjoy the environment in which we live and work.

### *Daylight*

179. An external daylight, sunlight and overshadowing assessment was submitted to demonstrate the impact of Plot H7 on neighbouring properties by carrying out the tests described in the BRE guidance. These are the Vertical Sky Component (VSC) to windows to habitable rooms and the No Sky Line (NSL) tests of daylight distribution within habitable rooms. Given the location of Plot H7 in the centre of Elephant Park, the affected properties are also within the Elephant Park masterplan - Plots H2, H3, H6, H10 and H11B. As the Heygate Estate buildings were demolished five years ago, the completed plots currently look out on a relatively undeveloped Plot H7, with only the temporary construction offices on it. Therefore instead of using the historic “pre-existing” massing of the now demolished building for the BRE tests, or the existing situation of a near-vacant plot, the submitted assessment refers to the massing of the 2012 illustrative masterplan of Plot H7 to provide the “baseline” figures. The massing of the proposed Plot H7 in this RMA is then compared with this “baseline”; this approach was used in the consideration of the reserved matters for earlier Plots H5, H11A and H11B.
180. The submitted daylight and sunlight assessment uses the following criteria for assessing whether there will be a material impact on daylight and sunlight to neighbouring properties, if:
- A window experiences a difference in absolute VSC of 2% or more from the massing of the illustrative masterplan;
  - The NSL within a room is reduced by 5% or more beyond the impacts associated with the illustrative masterplan;
  - A window experiences more than an absolute 1% change in winter sunlight and more than an absolute 2% alteration in annual sunlight from the results associated with the illustrative masterplan.
181. As Plot H7 faces onto five other plots in its central position, it was always going to affect more windows than other plots. When the Plot H7 RMA proposal is compared with the impacts the illustrative masterplan massing would have had (and the reductions in daylight to neighbouring properties that would have resulted from that massing), of the 1,638 windows tested for VSC 84% pass (1,368), and of the 270 windows that fail:
- 93 are in Plot H2 – which is occupied
  - 0 are in Plot H3 – which is occupied
  - 157 are in Plot H6 – which is occupied
  - 0 are in Plot H10 – which is occupied
  - 20 are in Plot H11B – construction is yet to commence.
182. The submitted daylight report also compares the impact of the OPP’s maximum parameters of Plot H7 with the impact of the RMA on current VSC values of neighbouring properties. In this hypothetical comparison, only 68% of the 1,368 windows of neighbouring properties would have passed. This demonstrates that the detailed design and massing proposed in this RMA has less of an impact than the maximum parameters in the OPP, resulting in 251 fewer windows being noticeably affected. This is to be expected when the Plot H7 scheme in this application sits between the illustrative masterplan massing and the maximum parameters approved.
183. In terms of no sky line (NSL) changes, of the 824 rooms in neighbouring buildings that

were tested, 712 (87%) were found to pass – i.e. their NSL would reduce by no more than 5% in absolute terms or retail daylight distribution to at least 80% of the room. Of the 110 (13%) rooms that failed:

- 44 rooms in Plot H2
- 6 rooms in Plot H3
- 50 rooms in Plot H6
- 4 rooms in Plot H10
- 6 rooms in Plot H11B.

184. Again, comparison with the hypothetical scenario of the maximum parameters has been detailed in the submitted report. This shows that under the maximum parameters, the NSL levels to 311 rooms would have been noticeably affected, i.e. 170 more rooms than are affected by the current RMA scheme.

185. The impacts on the daylight levels and distribution to these neighbouring properties are considered further below:

- Plot H2  
The affected 93 windows and 44 rooms are in 54 flats on the eastern façade of Plot H2, which face across Sayer Street. The 93 windows that would experience a material change in VSC serve 58 rooms (38 living/kitchen/dining rooms and 20 bedrooms). 44 rooms would experience a noticeable reduction in NSL; 22 of these are rooms that would also experience a VSC reduction. The VSC reductions are up to 6.5% VSC (in absolute terms) but more often 2.1-5% reductions on windows that have already low values of 7-12% VSC.

It is noted that most affected units at first to fourth floors in the centre of the facade are single aspect, and sized as wheelchair units so have generous internal sizes. The combined LKDs would experience a noticeable daylight loss, but the bedrooms would not. Eight flats are affected by daylight distribution only, but have another west-facing outlook that would not be affected by the Plot H7 proposal. The two dual aspect units per floor at the each end of the façade would experience a noticeable reduction in VSC to the living rooms, but the bedrooms would be unaffected and retain good daylight distribution.

On the higher floors, (especially the fifth floor) rooms are affected by both reduced VSC and daylight distribution reductions however these units retain better VSC values; 38 affected windows would retain VSCs of more than 15% which is considered a relatively good level for these windows that were due to face onto the massing of Plot H7.

- Plot H3  
Six rooms in this plot would experience a noticeable change in daylight distribution. No windows have a noticeable reduction in VSC. These six rooms are in six different flats, one faces north towards Plot H7 and the other five face east but it is the change to the daylight reaching their north-facing windows in the recessed balcony that have the noticeable impact. The north-facing flat would still have daylight distribution across 67% of this bedroom, the overall daylight impact is acceptable. Given the primary outlook of the five east-facing flats would not change and the VSC levels are not noticeably affected their overall daylight provision would remain acceptable.
- Plot H6  
43 units on ground to seventh floors that face onto Plot H7 across Heygate Street

would be affected. It is also worth noting that the mature trees in front of Plot H6 have not been modelled. These large trees would reduce daylight levels to the H6 windows, particularly in summer. 157 windows serving 99 rooms (11 LKDs and 81 bedrooms) would experience a noticeable reduction in VSC; the LKDs have other windows that retain good VSC levels. 50 rooms (three LKDs, seven living rooms and 40 bedrooms) would experience a noticeable reduction in NSL. All of the affected units are dual aspect and have an alternative outlook and daylight source away from Plot H7. For example, the windows and rooms at the ground and first floor are dual aspect maisonettes that have south facing windows and gardens which would not be affected by the Plot H7 proposal.

- Plot H10  
Four rooms in four units looking onto Heygate Street would have their daylight distribution affected. No windows would experience a noticeable reduction in VSC. It should be noted that the daylight modelling does not attempt to model the impact of the retained mature trees in front of Plot H10 which would reduce the actual daylight levels to the lower levels, particularly in summer when trees are in leaf. The ground floor living room has very low distribution already at only 12% so the reduction to 7% would not materially alter the quality of this maisonette. The other rooms are LKDs that would retain daylight across at least 50% of the room areas. Their overall daylight provision would remain acceptable.
- Plot H11B  
The affected rooms and windows are in twelve flats at third to eighth floor levels in the western flank of Plot H11B. Of the 20 windows that would experience a noticeable reduction in VSC, nine are secondary windows to each LKD (which has a much larger window facing either north or south). The other eleven windows are bedrooms and six would also experience a noticeable reduction in daylight distribution. As one bedroom within each of these two-bedroom units (with retained VSCs of 18% and higher on fifth floor level and higher), the overall impact on the daylight levels of these flats is considered to be acceptable.

186. For these reasons, Plot H7 is considered to have an acceptable impact on the daylight levels of surrounding properties within the Elephant Park masterplan site and their resulting quality of the accommodation.

#### *Sunlight*

187. Only Plot H11B has windows that face within 90 degrees of south that may be affected by the proposal. Of the 50 rooms assessed in Plot H11B for APSH, 46 (92%) would retain good sunlight levels. Of the 4 (8%) that fail:

- Three are secondary windows (to three living/kitchen/dining rooms) that are much smaller than the principal windows.
- One serves a bedroom.
- They would each retain between 20% and 24% of the annual sunlight hours which is relatively good for an urban area.

188. Overall, the proposal would have an acceptable impact on the sunlight levels reaching the windows of neighbouring properties.

#### *Overshadowing*

189. The “sun hours on ground” overshadowing analysis shows that with the illustrative

masterplan massing considered in the OPP of Plots H7 and H1 in place, the new public park would have 60% of its area receiving at least two hours of sunlight on 21 March (excluding the shading by the mature trees). When compared with the submitted form of Plot H7, this reduces to 56% of the park area receiving at least two hours of sunlight as the proposed massing is larger than the illustrative masterplan scheme. The sunlight provision to the park is still above the recommended minimum 50% set out in the BRE guidelines, and above the 45% park area in the maximum parameter scenario.

*Conclusion on daylight and sunlight impacts*

190. The 2012 ES anticipated that the density of the Elephant Park development would create challenges in achieving levels of daylight and sunlight recommended by the BRE, even when building to the minimum parameters. Plot H7 is surrounded on three sides by other Elephant Park plots, and the relationship between facing facades was anticipated to be challenging to provide good daylight and sunlight levels to the new units, particularly to the lower levels.
191. It is acknowledged that the massing of Plot H7 is within the approved parameters for this plot in the OPP (with the small alterations approved by the NMA for the lift over runs etc), and that the 2012 outline application anticipated low daylight levels to the facing facades of plots especially at the lower floor levels. The submitted External Daylight, Sunlight and Overshadowing Assessment shows how the massing impacts fewer neighbours than the approved maximum parameters of the OPP. It analyses the existing and future homes in the neighbouring plots that would experience reductions to daylight levels (VSC) or daylight distribution (NSL) beyond those recommended by the BRE. There are 22 affected units in Plots H3, H10 and H11B which are considered not to experience a significant level of harm to their amenity from the reduction of daylight. The daylight impacts to 97 units in Plots H2 and H6 are more noticeable, but are on balance considered acceptable particularly as many units are dual aspect so that living rooms would retain good daylight levels.
192. The proposal would not cause significant harm to the amenity of the flats in Plot H11B from the loss of afternoon sunlight. It would not significantly overshadow the new public park in the centre of the masterplan.
193. The affected units are all within the masterplan site. When weighed against the benefits of bringing this brownfield site into productive use, it is considered that the instances of harm caused to particular rooms of neighbouring properties are not so severe as to warrant refusal of an otherwise acceptable scheme.

*Outlook and privacy*

194. The proposed units would face outwards towards the windows of Plots H2, H11B and H6. The south facing windows would look over Heygate Street to Plots H3 and H6, at a distance of 25m, and so comfortably exceed the minimum 12m separation for the front of buildings. The west facing windows would look over Sayer Street to Plot H2 at a distance of 12.5m, so achieve the minimum distance. The facing windows on the eastern side would be 13.5m from the approved side windows of Plot H11B across the new route, except at one point where the proposed bay window projection would be set 11.5m at the very corner of Plot H11B, however due to the angling of the two blocks is acceptable.
195. These separations are sufficient to prevent the proposed buildings from being intrusive to the outlook of surrounding properties' windows and amenity areas, particularly when the neighbouring blocks are within the Elephant Park masterplan and the blocks are within the approved parameters of the OPP.

### *Construction phase impacts*

196. The 2012 ES considered that the impacts associated with construction would potentially have an adverse impact for sensitive receptors closest to Elephant Park due to the noise, vibration, and deterioration of local air quality from dust generating activities and construction traffic. Those living closest to the Plot H7 (including the occupiers of the completed MP1 and MP2 residential properties) would be the most likely to experience nuisance at different times and magnitude over the remaining construction programme for the wider Elephant Park development.
197. The OPP secured a number of measures to reduce the impact on neighbour amenity, for example condition 18 and the legal agreement require the submission of a construction environmental management plan (CEMP) for each phase of construction which needs to detail measures such as acoustic screening, construction traffic routes, and measures to minimise dust. Monitoring throughout the works is also required to ensure agreed targets are met.
198. The measures secured by the OPP to minimise construction impacts are considered robust and should ensure that potential adverse effects from the construction of Plot H7 are reduced as far as possible.
199. In conclusion, the RMA is considered to have an acceptable impact on the amenity of neighbouring properties, which for this plot are other Elephant Park plots.

### **Impact of adjoining uses on future occupiers of the development**

200. The context of the site is mainly residential properties as Plot H7 is in the centre of the Elephant Park. Neighbouring Plots H2, H11B, H6 and H3 are mainly residential with ground floor retail, office and community uses, and approved by the OPP.
201. Conditions 39 (internal noise levels) and 40 (external noise levels) on the OPP set target noise levels for proposed residential units to sufficiently mitigate them from nearby noise sources. Further conditions 41 and 42 protect residential units from the ground floor commercial units and any plant. For these reasons, the proposal is considered likely to result in acceptable noise levels for the proposed residential units.

### **Design issues, including impact on heritage assets**

202. The proposal is the fifth and final residential phase of the outline permission for the Heygate redevelopment. This phase relates to Plot H7 which is triangular in shape and faces onto the Heygate Road and Sayer Street (formerly known as the Shopping Street) to the east and south, and the newly established Elephant Park to the north which is at the centre of the Masterplan.
203. The proposal is not located in a conservation area however, due to its height and location it is may be visible from neighbouring conservation areas and therefore could affect their settings.
204. The OPP took into account the historic setting as well as the character of the wider area and included as part of the permitted documents, detailed plot-by-plot design guidance in the Design Strategy Document (DSD). The OPP established the urban principles of the redevelopment of the Heygate Estate and is characterised by a new gridded pattern of streets and routes with perimeter blocks and tall buildings in key locations as well as a set

of character areas for the masterplan. This urban framework, detailed design guidance and character appraisal set down the key design principles for the subsequent RMAs.

205. Plot H7 is located at the centre of the masterplan and is entirely surrounded by new development. Its frontage onto the Park Character Area and the Walworth Road Character Area suggest that it will need to play an important role to reinforce the 'shopping street' nature of the Sayer Street and to give a park a clear definition.
206. This RMA will be considered against the requirements defined in the consented parameter plans and the detailed guidance set out in the approved DSD taking into account local setting and considering the appearance of the proposed development in detail. The information submitted includes:
- The architectural treatment of the buildings including all the street frontages, the detailed design of the tall buildings and the landscape treatment of the public spaces, and communal gardens.
  - Local and wider view analysis – views have been scoped and locations agreed with the applicants. These have been based on the views agreed at the OPP stage and added to as necessary to demonstrate the impact of these proposals on the immediate and wider townscape.
207. Plot H7 includes a prominent tower at its north-western edge. As such it will need to be considered against all the requirements of saved policy 3.20 of the Southwark Plan which requires that a tall building:
- 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.

*Urban layout and arrangement of blocks*

208. Whilst this is prescribed by the approved parameter plans, the variance between the maximum and minimum parameters allows a degree of flexibility to designers to adjust the illustrative scheme in response to local criteria or to enable a required design effect. The main adjustments from the illustrative scheme – within the approved parameters (which have been recently amended by the NMA application ref. 19/AP/0952) are:
1. Change from three mansion blocks to two, by combining the separate Sayer Street and Heygate Street blocks of the illustrative masterplan into one L-shaped building. This means a gap is removed at the western side, and the gap at the eastern end has been widened.
  2. The main access for servicing remains from Heygate Street, however due to the constraints of this triangular-shaped site (preventing vehicle access down into a useable basement), the necessary arrangement of land uses on the ground floor to create active frontages, and the resulting enclosed servicing yard, the consented ground-level communal garden has been raised to be located on the first floor podium level.
209. Plot H7 has been designed to reinforce the main street frontage on Heygate Street and to complement the retail character of Sayer Street. Onto the park the proposal is intended to mirror the recently consented proposals on Plots H4 and H5 and to give the park an

appropriate and well defined edge.

210. The tall building is located at the western corner of the plot nearest the park and Elephant Square.
211. Plot H7 comprises a number of buildings including
- The Park frontage buildings; and
  - The L-shaped Heygate / Sayer Street building
  - The tower.

*The Park frontage building and the L-shaped Heygate/Sayer Street building*

212. Both of the lower buildings have been designed as modern mansion blocks. The park frontage building extends along the southern edge of the park and wraps round to the Heygate Street frontage. In the same way, the L-shaped building wraps around from Heygate Street onto Sayer Street.
213. The mansion block model is appropriate for these buildings and reflects the urban character of the area. The buildings present a consistent edge to the park and the streets with retail frontages and residential entrances at the base and residential accommodation above. The blocks rise to 9-storeys in height and are divided into vertical bays which also coincide with the main residential entrances. The proposed height is consistent with the consented parameters and reflects the scale of the recently consented Plots H4 and H5 on the north side of the park. At the base of both blocks the retail units are arranged along the edge of the plot and help to animate the edge with small scale retail on the park and Sayer Street and retail, leisure or community facilities on Heygate Street.
214. They have been designed as brick-clad buildings with cantilevered balconies and living rooms arranged in large projecting vertical bays. The brickwork façade is further divided into three horizontal layers (with a stone band at 6- and 8-storeys, with a change from darker to lighter mortar up the façade, and decorative corduroy band at the top), which gives these relatively long buildings a measured scale and proportion, reflecting the residential proportions of the residential streets in the area. On the inner face the blocks are clad in a light/white brick. This is a traditional Victorian approach to such mansion blocks, with the white brick helping to make the most of the light in the well-proportioned but relatively narrow courtyard. Other detailing such as a scalloped masonry band at the top of the commercial units, and the glazed bricks to be used for the recessed residential entrances are welcomed and would add further interest.
215. The mansion blocks are considered acceptable in their height, massing and articulation. The gaps in the Sayer Street and Heygate Street (and to a lesser extent the park) frontages help to bring sunlight/daylight onto the elevated courtyard, and provide a visual link up the podium garden from the ground level public views.

*The Tower*

216. The tower is located as described in the OPP, at the north-western corner of the plot facing onto the park. The plan takes the form of a square with a rotated leading edge made up of the main living accommodation which project out at the four prominent corners, to give a pin-wheel plan. This asymmetrical corner pivot design gives the tower a recognisable identity and is appropriate in this key location in the masterplan. The tower is proposed to be clad in masonry coloured concrete panels which will give it a tactile quality which contrasts appropriately with the more metallic towers of the New Kent Road and the Walworth Road frontages. The projecting bays would be clad in a contrasting

darker, profiled masonry panel and give the tower a strong vertical emphasis which is appropriate.

217. The base of the tower has been designed as a double-height entrance hall and 'super lobby' that addresses the park and the main approach from the rail and Underground stations. This entrance leads to the facilities for residents including the double-height residential lobby a feature stair up to the communal gardens and a communal room which leads off it. The double-height proportion of the base is appropriate in this context. It matches the scale of the tower and links up with the upper level communal spaces which in turn spill out onto the elevated communal garden.
218. The top of the tower is visible from a number of vantage points and is it stepped to reflect the elegant vertical proportions of the pivot design. This distinctive 'crown' is achieved by extending the darker masonry structures of the bays up beyond the top of the building to articulate and distinguish this tower from others in the area.
219. A number of wireline views have been submitted with this RMA. The views follow the views established during the 2012 application which tested the visibility of the development, especially of the tower, from a number of vantage points. It has been tested in the LVMF view from Serpentine Bridge to Westminster, where it would sit within the tree line, near to the tower of the Houses of Parliament and far below Strata. The proposal would not harm this strategic view.
220. The important new borough view of St Paul's Cathedral from Camberwell Road (as proposed in the New Southwark Plan) is preserved. The lower range of buildings is set below the peristyle of the Cathedral, and the Plot H7 tower is away and to the left of the dome.
221. The submitted views include a number from surrounding heritage assets including conservation areas. The view from St George's Circus shows that the tower would be visible alongside the base of the listed obelisk (grade II\*). The tower is considered not to harm the setting of the obelisk as the shape of the main height is legible, and given its location in the middle of a roundabout, it is viewed against a varied back drop of townscape and buildings. It is within the maximum parameters approved by the OPP, and would be viewed alongside Plot H2's tower and the approved Shopping Centre towers.
222. The remainder of the views demonstrate that the tower would form part of the group of towers in the approved Elephant Park masterplan. When viewed from near the grade II listed The Star and Cross Church on Falmouth Road to the north, the upper parts of the tower would be visible between Plots H4 and H5 which are closer and so appear much taller. When viewed from Walworth Road (within the conservation area and near to the grade II listed Southwark Municipal Offices, Library and Cuming Museum, and Walworth Clinic, the tower is set further away (and would appear lower) than the Plot H2 and H3 towers, and sits within the approved maximum parameters envelope. The proposal is considered to preserve the setting of these heritage assets.
223. The tower is considered acceptable in height scale and massing. It complies with the consented parameters (as amended by the recent non-material amendments).
224. The gaps between façade of the tower and the immediately adjacent blocks range from 6.8m to 9.9m. Whilst on the face of it this appears close, the internal layouts of immediately adjacent flats have been amended with the main windows of affected dual aspect living rooms orientated away from each other to avoid direct overlooking. This is a solution that has been used successfully elsewhere in the Elephant Park and other developments in the borough.



225. The quality of the tower's design will need to be maintained with the detailed design of the cladding, the selection of colours and the balconies. As this building would be appreciated in the round from wider viewpoints a full-scale mock-up of the tower's cladding would be reserved by condition. Additional conditions requiring sample panels of the cladding materials the windows, doors and glass balustrades to be used for the completed building, and 1:20 scale contextual sections and 1:5, 1:10 scale details of the heads, cills and jambs of openings and balconies, parapets, as well as shopfronts, cycle stores and refuse enclosures should be provided prior to commencement of above-grade works. Such conditions are proposed for this RMA.
226. The tower must be assessed against the council's tall buildings policy 3.20 of the Southwark Plan. This policy has sub-sections i to v, which will be considered in turn here:
- i. Plot H7 would provide parts of the public routes and public realm along Heygate Street, Sayer Street, along the southern side of the park and next to Plot H11B which provide an appropriate setting for this plot and contribute to the landscaped street, routes and new public park approved as part of the Elephant Park masterplan.
  - ii. The locational criterion of policy 3.20 was addressed in detail by the adopted Elephant and Castle SPD which identified the former Heygate Estate as an area of London-wide significance and included a tall buildings study which identified the Elephant Park site as being suitable for a tall building. The OPP permitted a tower in the north-western corner of Plot H7, having considered the impact on LVMF views and local views. The tower within this RMA is in accordance with the OPP, as amended by the recent NMA.
  - iii. The architectural qualities of the tower proposal rely on its simple design and elegant proportions as well as its standard of accommodation. The design is simple and elegantly three-dimensional. The tower's pivot design and elegant verticality would give it a highly articulated presence onto the Park and Sayer Street and enhance its visibility from a number of approaches. The units within the tower exceed the council's minimum standards of accommodation, half the units are dual aspect, and have good levels of private and communal amenity spaces.
  - iv. The proposal relates well to its surroundings in terms of the group of tall buildings in the Elephant Park masterplan, and at ground level by proposing active frontages across each side of the plot to appropriately address the new shopping street, main Heygate Street, and the park frontages. The public realm allows for generous pedestrian routes around the plot and tree planting.
  - v. This crisply design, pin-wheel extrusion would contribute positively to the London skyline. It would cluster appropriately with the completed towers of Plots H2 and H3, and other nearby towers of Strata and One the Elephant. The submitted townscape views show that the tower would sit comfortably within the established Elephant Park cluster. This is appropriate and reflects the principles in the Elephant and Castle SPD.
227. For these reasons the proposed tall building is considered appropriate and a high quality progression from the OPP and its Design Strategy Document. It would comply with saved policy 3.20 of the Southwark Plan, and would not cause harm to heritage assets.

*Design Review Panel*

228. The Southwark Design Review Panel reviewed the Plot H7 proposal in November 2018. In reaching their conclusion, the Panel “*generally supported the design of the tower and the arrangement of uses around the ground floor. They raised concerns over the massing and arrangement of the mid-rise blocks especially the lack of breaks between blocks which has had a negative effect on the quality of the courtyard and increased the number of single-aspect units.*”
229. The above issues have been responded to by the current submission – the introduction of a further break in the L-shaped block was considered but discounted because it would not lead to a significant improvement of the sunlight/daylight of the central courtyard. Instead this made the case stronger for the inclusion of the roof-top garden in the affordable housing block (above Block B).
230. The Panel also “*encouraged the designers to look again at the architectural treatment of the tower and the blocks including their architectural features like bays and entrances in order to give them variety and a stronger sense of identity.*” The tower design has been further refined to improve its top and to distinguish the bays and entrances. Similarly the detailing of the communal entrances and projecting bays on the blocks have been further refined since the DRP reviewed the scheme.

*Secured by design*

231. The plot has been designed to meet the Secured by Design requirements and would achieve certification; this is an indicator of an exemplary design. As condition 47 of the OPP requires details of the security measures to be installed and seeks to achieve Secured by Design accreditation, so there is no need to replicate the condition on this RMA.

*Other heritage impacts – archaeology*

232. The archaeological Watching Brief for the Elephant Park masterplan was deemed necessary in only a few parts of construction phases MP3 and MP5 (in Plots H4 and H1), and within the central park. Plot H7 has been excluded for archaeological interest, and so the council’s Archaeologist considers no monitoring is needed for this RMA.

*Conclusion on design*

233. The layout of Plot H7 and its blocks, its scale, heights of the tower and two mansion blocks are appropriate for this central plot that sits between the park and Heygate Street, and forms a key part of the central shopping street. They are in line with the parameters and design principles established by the OPP. Plot H7 would make a positive contribution to the local context, streetscape and new character of Elephant Park, and so achieve one of the characteristics of exemplary design set out in the Residential Design Standards SPD. The landscaped public realm around the plot enhances this area, and continues the routes and material palette established on Elephant Park. The architecture demonstrates an excellent design quality. The proposal would cause no harm to the setting of listed buildings, conservation areas, the LVMF views, and to archaeological assets. Conditions on the OPP and recommended for this RMA would require further details to be submitted and approved to ensure the design quality is continued through to the build phase.

**Trees, landscaping, public realm and ecology**

234. The RMA proposes the public realm around each side of the building, the landscaping of the podium garden and roof terraces, and shows green roofs to blocks A and C.

235. None of the remaining trees on site are to be retained, in line with the OPP, most having been removed during demolition and with the construction of Lendlease's temporary offices. The park frontage has been sited to allow the mature trees in the park to be retained.
236. The plot would provide public realm on all sides of the building, adding to the new routes through Elephant Park between the plots and enhancing the pedestrian environment. The area around the building would allow for emergency vehicle access, and incorporates cycle parking and seating. The palette of surfacing materials would tie in with those used in the completed phases of Elephant Park. New street trees are proposed along Heygate Street, Sayer Street, and between H7 and H11B, to establish formal planting rows along the streets.
237. The communal garden has taken inspiration from the theatre and cinema heritage in the area, with a layering of planting, trees and screens (like layering scenery), an arrival "foyer" area of seating in the garden next to the tower for people to meet and wait, a central "stage" to the podium garden as the focus of activity, and smaller more intimate "rooms" to the sides with pergolas and planting. All residential cores can be accessed from the communal garden with three main paths linking the cores, as well as their ground floor lobbies, creating opportunities for residents to meet informally in the gardens. In the three gaps between the blocks, the garden has been extended right to the edge of the building to be visible from the ground level, and from within the entrance lobbies. Some 17 trees (and 22 specimen shrubs) are proposed in the podium garden, timber seating, large communal tables, lighting and colourful play elements. The species selection for the courtyard garden has taken account of the low sunlight availability to most of the podium, in order to favour shady shrubs and herbaceous planting.
238. The roof terraces would be mainly hard landscaping with raised planters (and species suited to the sunnier location) seating, a grow garden. The terraces would be accessed by the stair and lift cores to the blocks.
239. The Urban Forester considers the proposal to be a well designed and specified landscape plan, recommending only a compliance condition. Clarification was provided on the use of a particular species in an amended planting schedule to address his comment.
240. Areas of green roof would be included above blocks A and C, away from the roof terraces. The landscape strategy is comprehensive and provides a mosaic of habitats, and would provide a net gain in biodiversity. The Ecology Officer is supportive of the proposal, and suggests that water features could be added at ground and roof level. Further enhancements could be provided by insect hibernacular and loggeries, although the detail of these would be expected as part of the condition 48 requirements of the OPP (which requires an Environmental Action Plan detailing the bat and bird boxes, native planting and monitoring). Condition 49 of the OPP requires details of the green/brown roofs. No further conditions relating to ecological enhancements are necessary for this RMA.

### **Transport and highways**

241. Strategic Policy 2 of the Core Strategy sets that the council will encourage walking, cycling and the use of public transport, rather than travel by car. The application site is located in a high PTAL (Public Transport Accessibility Level) area of 6b which is the highest level, and therefore benefits from excellent links to public transport. A Transport Assessment and Framework Travel Plan were submitted as part of the OPP which assessed the likely transport impacts of the Elephant Park development, and mitigation

measures were secured either by condition or legal agreement in the 2013 permission.

242. There were five key principles in relation to site layout, which were established through the Elephant Park masterplan. These were:
- Reflecting pedestrian movement patterns and desire lines
  - Create a public realm network that integrates with the wider context
  - Create a varied and appropriate urban grain that is responsive to context
  - Develop the land use strategy in relation to the principal streets and spaces of the plan.
  - Reinforce variety and uniqueness with plot and frontage proportions that reflect the differing uses and character of the framework.
243. The plot has the highest PTAL rating of 6b (excellent), due to the range of public transport services in the area with the Underground, rail and bus services.
244. The s106 agreement associated with the OPP sets out the phased highway and transport improvement works to be completed alongside the construction of Elephant Park. A few were linked to the practical completion of Plot H7 e.g. provision of the vehicle access from Heygate Street onto the plot, and linked to the delivery of the later of two plots (e.g. works on Heygate Street to provide a signalised junction). The detailing of these works continue to be discussed with the Highways team and TfL as part of the s278 agreements.

#### *Car parking and club*

245. Car free developments are supported by policy, subject to providing sufficient blue badge spaces. The only parking proposed are two off-street car parking spaces (for wheelchair users) in the servicing yard, and if there is demand for further wheelchair parking spaces, more can be made available in the basement car parking of Plot H2 as these have not been taken up by residents. This on-plot parking provision is far lower than the maximum of 616 spaces allowed by the OPP, and in view of the high PTAL rating of the site and its location close to the shops and services of the Elephant and Castle town centre, is supported.
246. The OPP included a requirement to provide car club spaces across the Elephant Park site. No car club spaces are proposed for this plot, but it would be within ready walking distance of the two car club spaces provided on Wansey Street and the two spaces to be provided on Rodney Place next to Plot H11A. Future residents would benefit from 3 years free membership, as required by the 2013 section 106 agreement.

#### *Cycle parking*

247. Eight cycle stores are shown on the ground floor to provide 466 covered, secure spaces for residents. This provision meets the minimum requirement for this housing mix set by the OPP (i.e. the London Plan requirements at that time). Spaces would be provided in a mix of Sheffield stands and double stackers. A dedicated cycle store would provide 16 spaces for staff of the commercial units, and further details are required to be submitted by condition 53 of the OPP.
248. Visitor cycle parking would be provided by 22 Sheffield stands (44 spaces) in the public realm around the building. Again, further details are required by condition 54 of the OPP. The cycle parking indicated at this reserved matters stage is acceptable, with further consideration to be given when discharging the condition.

*Cycle hire*

249. The OPP section 106 agreement includes an obligation to provide cycle docking stations on or close to the Elephant Park site. The indicative locations were not on this plot, nor is any docking station proposed in this application, so while the site-wide discussions continue (with TfL and the Highways team), the lack of provision for this plot is not of concern.

*Refuse and servicing*

250. The public realm around the northern and eastern sides for the plot has been sized for emergency vehicle access. Heygate Street and Sayer Street as roads would provide access to these sides. The internal servicing yard is intended to deal with the deliveries and servicing trips for this plot, and has been sized to accommodate three vehicles plus the necessary turning area. A drop off bay is proposed on Sayer Street and the delivery bay in front of H11B can be used for drop-off point for residents.
251. The 2013 section 106 agreement required that prior to the overall implementation of the Heygate Masterplan development, a Site Wide Servicing Management Strategy be submitted for approval detailing the arrangements for the entire site. The site-wide strategy was approved for the wider Masterplan area in December 2016 (ref. 14/AP/3517). The section 106 agreement also requires a Service Management Plan prior to implementation of each plot which provides further details of the servicing and waste proposed for that plot.
252. A draft servicing management plan has been submitted as part of this RMA, which predicts 71-82 servicing vehicles per day, with a peak of 7 per hour. The servicing yard entrance has been set back from the pavement to allow a vehicle to pull off Heygate Street and clear the pavement, when waiting for the gate to open. Traffic signals within the yard would be used to manage vehicles entering and exiting. Swept path diagrams have been included for different sizes of vehicles. The concierge at the base of the tower would be able to accept small deliveries for residents, and can be reached from the internal servicing yard and from the main residential entrance.
253. Refuse vehicles would use the internal servicing yard for commercial and residential refuse collection. The six residential refuse stores across the ground floor would be monitored by the management company, who would transfer full bins to the holding store and delivery bay for collection from the internal servicing yard. Further details of these arrangements are required by condition 57 of the OPP for the domestic refuse. Condition 58 of the OPP requires details of the storage arrangements for the commercial units; three retail bin stores are shown that would be accessible through the internal corridors to the commercial units. This is considered to be sufficient information at this RMA stage, noting that the draft Servicing Management Plan would need to be updated following the removal of the Heygate Street bay in any case.

**Wind microclimate**

254. The wind assessment contained in the 2012 ES identified the need for further testing to be undertaken at the detailed design stage of the plots to demonstrate that a plot design is suitable for the intended uses. A wind microclimate assessment for Plot H7 has been submitted which sets out the results of the wind tunnel modelling undertaken on a 1:300 scale model of the proposal (without the landscaping), and the cumulative development with the other plots.

255. The wind assessment found that the ground level wind speeds around the plot would be mainly suitable for sitting and standing/entrance use with only a few incidents of higher wind speeds (for leisure walking) in the windiest season, which is similar to the existing situation as the “baseline” scenario. The podium garden and roof gardens would have wind levels mainly suitable for sitting, and only three incidents of standing wind levels in summer. In the cumulative scenario, the summer wind levels are all at the lowest speed of suitable for sitting. The wind conditions for the tested balconies are appropriate.
256. The submitted wind microclimate assessment concludes that wind levels are suitable in both the proposed and cumulative scenarios in the test locations within and around Plot H7.

### **Air quality**

257. The site is located within the borough’s Air Quality Management Area (AQMA). Air quality in Elephant and Castle is known to be particularly poor, with vehicular traffic acknowledged as the principal source of air-borne pollutants. European and national legislation establish objectives for improving air quality, including reducing concentrations of nitrogen dioxide and nitrous oxide (NO<sub>x</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>25</sub>). Guidance in the NPPF states that planning decisions should be consistent with these aims.
258. The air quality chapter in the 2012 ES at the OPP stage noted that further work would be needed as part of the subsequent RMAs, detailing how the potential impacts of emissions from dust, road traffic and from the plant in the Energy Centre would be minimised.
259. An air quality assessment has submitted with this RMA. It assesses the potential air quality impacts of the Plot H7 as part of the Elephant Park during construction and operational phases, and sets out the mitigation measures to reduce the impacts. Traffic modelling was carried out to assess the air quality impacts (concentrations of NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>25</sub>) of traffic flows in 2022 with and without the Elephant Park development, particularly from construction traffic. The emissions from the Energy Centre’s CHP were also calculated to give the cumulative impacts on air quality. Dust levels from the construction phase were estimated. Recommendations regarding controlling dust can be incorporated into a construction environmental management plan.
260. Monitoring information was gathered from local receptors, including locations within Elephant Park site and sensitive uses in the local area, and this was combined with government issued data and projections. This plot as part of the wider Elephant Park was found not to raise air quality issues as most were negligible impacts on the concentration of pollutants, and not significant. The assessment for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>25</sub> were found not to need mitigation in the operation phase of the development. The air quality assessment concludes the proposal is air quality neutral.
261. The Environmental Protection Team has reviewed this document and raises no objection. As with previous RMAs, the impact on air quality during the construction process will be controlled by effective mitigation measures within the construction management plan for both road traffic and dust suppression, as required by conditions 18 and 20 of the OPP. Measures built into the development, such as its very low parking levels, cycle parking, pedestrian routes, car club spaces and travel plans are further measures to reduce vehicle transport and minimise traffic pollutants. Further details of the ventilation for the residential units are required by condition 44 of the OPP.

## Sustainable development implications

### *Sustainable drainage and flooding risk*

262. Plot H7 is in flood zone 3 and benefits from the Thames flood defences. The site is within the area at risk from flooding in the event of flood defence breach and so a flood risk assessment has been provided. The ground finished floor level of the plot would be 3.2m AOD, which is just above the predicted breach event level in 2100 of 3.17m AOD. The ground floor uses are commercial and other ancillary functions which are less vulnerable. The flats are set at first floor level and higher. The Plot Management Team would sign up the Environment Agency's flood warning service.
263. The Environment Agency notes that the finished floor level of the residential accommodation at first floor is above the flood breach level. While the finished floor level of the ground floor is not the recommended 30cm above the 2100 breach level, the EA notes it is for less vulnerable commercial uses and so has no objection. Other comments from the EA can be used as informatives.
264. The council's Flooding team has no objection to the proposal. While Thames Water have commented that the existing water infrastructure is not able to accommodate the expected needs of this development, this issue was highlighted in the 2013 OPP. Condition 27 of the OPP requires an impact study to be undertaken to determine the expected demand and a suitable connection point before the construction of each phase commences, and Thames Water is consulted on such applications. Conditions on the OPP address flood risk, surface water infiltration and require submission of a surface water drainage scheme prior to commencement of works on a plot.

### *BREEAM and Code for Sustainable Homes*

265. Condition 37 on the OPP required Code for Sustainable Homes level 4 to be achieved (as a minimum) for all units, and this requirement would continue to apply to Plot H7 to ensure sustainable design and construction methods are used. Condition 38 on the outline permission requires any commercial unit over 1,000sqm to achieve a minimum of Excellent (or very good for Class D1) and requires the certificate to be provided prior to occupation. The proposed flexible-use units are smaller than this requirement however.

### *Energy*

266. London Plan policy 5.2 states that in order to make the fullest contribution to minimising carbon dioxide emissions, developments should employ the following energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy). Since October 2013, the policy has set a minimum target for reduction in carbon dioxide emissions of 35% on 2013 Building Regulations and from 2016 requires residential developments to be zero carbon. London Plan policy 5.7 states that for major developments, this should incorporate the use of on-site renewable energy generation, where feasible.
267. The 2013 section 106 agreement attached to the OPP and subsequent Site-Wide Energy Strategy commit the developer to achieving a 44% reduction in carbon emissions beyond Building Regulations Part L 2006, which equates to a 25% reduction on Part L 2010. Whilst subscribing to the energy hierarchy, the Site-Wide Energy Strategy relies on the provision of an Energy Centre which powers a district heat network. The constructed Energy Centre contains highly efficient gas-fired combined heat and power (CHP)

engines and thermal stores that provide heat to all of Elephant Park via a local heating network. The Energy Centre is now operational.

268. An Energy Strategy has been submitted for Plot H7 which sets out how this RMA has considered the requirements of the Site Wide Energy Strategy. The estimated baseline CO2 emission rate for this plot is 524 tonnes of CO2 per year for a 2013 Building Regulations compliant version of Plot H7. The following measures are proposed as part of the development:

- Be Lean: Passive design measures that have been incorporated in Plot H7 include improved u-values, reduced air permeability and thermal fabric performance for the residential and non-residential elements of the development. This would result in a 9% reduction in CO2 emissions (48 tonnes/year) from the baseline.
- Be Clean: The plot will be connected to the site-wide heat network prior to first occupation, reducing carbon dioxide emissions by a further 186 tonnes, as a further 35.5% reduction from the baseline.

These “be lean” and “be clean” measures alone would exceed the Site Wide Energy Strategy’s target of 25% beyond 2010 Building Regulations Part L and meet the section 106 agreement’s requirements.

- Be Green: A range of renewable technologies were considered to supplement the “be lean” and “be clean” savings for this plot. Options including solar water heating, wind turbines, air/ground source heat pumps, fuel cell, and biomass were considered, but photovoltaic panels are the chosen renewable technology to be installed to the roof of block C. These would reduce the carbon emissions by 6 tonnes/year, as a further 1% reduction. Lendlease has stated that 100% of the gas used within the site’s Energy Centre is off-set by the operator’s off-site biomethane generation which is injected into the gas grid. If this biomethane usage were to be included in the calculation, a total carbon reduction of 80% is achieved compared with a 2013 Building Regulations compliant building.

269. While the plot does not achieve the zero carbon requirement for new residential development of the current London Plan, the minimum carbon reduction requirement was set by the 2013 OPP, and the proposal far exceeds the Site Wide Energy Strategy’s targets of 25% beyond the Buildings Regulations 2010.

270. The submitted Energy Statement also includes an overheating analysis which concludes that the passive design measures would mean proposed residential accommodation, corridors and stairwells would not experience overheating for more than 1% of annual hours for bedrooms, and 3% in living rooms, kitchens and communal corridors.

271. The plot design has taken sufficient account of the sustainability requirements of the OPP, and conditions on the OPP would require further details to confirm the Code for Sustainable Homes level has been achieved.

### **Planning obligations**

272. The section 106 associated with the OPP included planning obligations, with financial contributions and on-site/in-lieu works to the value of approximately £42.15m. The proposed Plot H7 development accords with the parameters and principles established by the OPP (as amended by recent NMA approvals) and that there are no new issues arising from this proposed plot to require the imposition of further planning obligations.



273. A range of applications are required by the 2013 section 106 agreement when a RMA is submitted including:
- Employment and Training Scheme – a report has been provided showing that Plot H7 would target a minimum of 55 jobs for local unemployed residents, 47 short courses, 109 CSCS cards and 25 NVQs/apprenticeships.
  - Affordable retail unit strategy – the smaller retail units on Sayer Street are more suitable for smaller, local and independent retailers that are intended to characterise this new shopping street alongside market and mainstream occupiers. Therefore the units in H7 may contribute towards the site-wide affordable retail provision, along with those to be provided in Plot H2 and the future pavilion. Further details are required prior to occupation of the plot to ensure the site-wide requirement of 10% of the total retail floorspace GIA as affordable retail space. At this RMA stage, the Local Economy Team is supportive of the application, and will continue to work with Lendlease on the cascade mechanism of the marketing to potential occupiers.
  - Community space contribution – the estimated amount based on the fixed formula per residential unit should Elephant Park not provide on-site community space (however, the development is on track to provide this on-site).
  - Health contribution – the estimated amount based on the fixed formula per residential unit that would be paid to the council (plus indexation).
274. A separate range of s106 details applications were submitted as required by obligations in the 2013 section 106 agreement regarding various aspects of car parking, contributions, wheelchair units. The details have been included in the assessment topics above where relevant.

### **Community infrastructure Levy (CIL)**

275. Section 143 of the Localism Act states that any financial contribution received in terms of community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral CIL is therefore a material consideration, however the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments of benefit to London as a whole, primarily Crossrail.
276. In Southwark, the Mayoral CIL2 has a rate of £60 per sqm of new development, although this is an index linked payment. As the OPP was granted before the introduction of the Southwark CIL, the development is not liable for Southwark CIL.

### **Community involvement and engagement**

277. A Statement of Community Involvement has been provided with the application, which summarises the pre-application public consultation undertaken by Lendlease between November 2018 and February 2019. Two public drop-in exhibitions were held which were advertised by flyers distributed to 12,000 properties, and a total of 29 feedback forms were received across the four days of the public exhibitions. Common topics raised in the feedback were to do with maintaining the quality of design of earlier phases, maximising street trees and roof gardens, connecting the architecture to local history, ensuring the retail units are occupied, and considering how deliveries and refuse is collected.
278. Local community groups including The Walworth Society, Southwark Cyclists, and Southwark Living Streets were approached by Lendlease and kept updated. Elephant Park residents were informed via a regular update meeting on site. A completed

Engagement Summary was provided, and is appended to this report.

279. Lendlease engaged in pre-application discussions with the planning department, and presented the scheme at the Design Review Panel. The Panel's comments are referred to in the main body of the report.
280. The RMA was advertised by the council by site notices, press notice and letters to 830 surrounding properties. The comments and objections received are summarised later in this report.
281. Details of consultation undertaken in respect of this application are set out in Appendix 1, and the responses received in Appendix 2.

### **Consultation responses and how the application addresses the concerns raised**

#### *Consultation responses from members of the public*

282. Summarised below are the material planning considerations raised by members of the public. 26 objections (two more were duplicates) were received to the consultation from members of the public and from Albert Barnes House TRA raising the following affordable housing and viability points:
- The OPP includes an obligation to build 25% affordable housing. While Lendlease will fulfil its affordable housing obligation it intends to do so by delivering fewer affordable homes than the Planning Committee were told would be delivered when considering the OPP application. The Committee was told there would be 570 affordable homes, while Lendlease now proposes to deliver only 541.
  - Lendlease has been granted a change to the OPP that will allow them to build 220 more units than the original maximum. The council neglected to secure the number of homes to be built and gave Lendlease the opportunity to build more, without getting any improvement in the affordable housing situation. There also appears to have been no effort to take advantage of any public funding.
  - This final RMA must be decided by the Committee, not officers alone. The Committee must ask why there are fewer affordable housing units than it was told to expect, while Lendlease was allowed to build more units in total. The Committee must also ask why there have been no viability assessments or reviews since 2013 and what has been done to improve the affordable housing.
  - There should be a viability review in order to reflect the increased density, and the Committee must refuse permission unless Lendlease increases the total number of affordable homes back to the indicative 570 the Planning Committee approved, plus 25% of the additional 220 units it has gained over the original maximum build. This would give a much-needed 84 affordable homes and half of these must be social rented, as Southwark's planning policy requires.
  - This is a poor development that offers nothing for Southwark's residents.
  - 35% affordable housing is needed.
  - The council is complicit in social cleansing, and guilty of a dereliction of duty in permitted the development without going through full planning committee process.
  - Lendlease is renegeing on its pathetic commitment to the community.
283. *Officer response:* These objections are addressed in detail in the Affordable Housing assessment section above, but in summary the OPP did not limit the number of homes to be built within the maximum residential floor area. The affordable obligation in the OPP requires 25% affordable housing, calculated on a habitable room basis (not by unit number). The 25% provision was far in excess of the 9.4% affordable housing scheme that was found to be viable in 2012/2013. At the time the outline planning application was

assessed in 2013, estimates were provided of the number of affordable units in the minimum scenario (of at least 511 to reprovide the demolished Heygate Estate along with the off-site locations), maximum scenario (574) and the indicative masterplan (570). Table 1 of the 2013 Committee report was clear that the affordable housing is to be based upon the percentage of habitable rooms rather than units. The development will, in total, deliver just over 25% affordable housing when measured by habitable room. There is no obligation on Lendlease to seek public funds. The only viability review required by legal obligations in the OPP was in the event that implementation did not occur within 2 years of the first reserved matters approval (which was not triggered as the first phase was implemented promptly), so there is no requirement for an updated viability review.

Consultation responses from internal consultees

284. Summarised below are the material planning considerations raised by internal consultees, along with the officer's response.

285. Ecology officer: supports the proposal as it will provide biodiversity net gain.

- The landscape strategy is comprehensive and provides a mosaic of habitats. Further enhancements could be provided by insect hibernacular and loggeries. Water features could be added on the biodiverse roofs and at ground level.

Officer response: Condition 48 of the OPP that requires an Environmental Action Plan to be submitted for each plot to detail the ecological enhancements to be incorporated. For this RMA stage, sufficient information has been provided of the biodiversity features, and further detail will need to be agreed pursuant to condition.

286. Environmental protection team: has no objection.

287. Flooding and drainage team: has no objection.

288. Local economy team (LET): supports this application.

- The application is accompanied by an affordable retail unit strategy, as required by the outline application and s106. LET expect the cascade for marketing in the strategy to be fulfilled.
- Construction phase jobs/skills and employment requirements: These are calculated by a bespoke method according to the Site Wide Employment and Training Scheme submitted to the council as part of the site-wide strategies required to satisfy the section 106 obligations. LET are content with this calculation and will monitor the new plot as part of the ongoing audit process with BeOnSite, acting for Lendlease.

Officer response: The construction phase jobs and skills of this plot will need to comply with the site-wide obligations secured in the 2013 s106 agreement. The operational phase of this plot will need to comply with the site-wide obligation on affordable retail.

Consultation responses from external consultees

289. Summarised below are the material planning considerations raised by external consultees, along with the officer's response.

290. Environment Agency:

- Asked for the AOD heights of the ground floor to be added to the drawings. Once this was done, the EA raise no objection, are satisfied that the finished floor levels are above the flooding breach level and the ground floor is to be used for commercial

use.

- Further comments encouraging the use of flood proofing and resilience measures, and a flood evacuation plan.

Officer response: The EA's comments can be used as an informative.

291. London Underground: Infrastructure Protection has no comment.

292. Metropolitan Police:

- Key principles of Secured by Design are to be incorporated for this plot. The development could achieve the security requirements of Secured by Design (which is welcomed as it is in a high crime area) and this should be secured by a condition of two parts (pre-commencement and pre-occupation).

Officer response: Condition 47 of the OPP requires details of the security measures to be installed and seeks to achieve Secured by Design accreditation, so there is no need to replicate the condition on this RMA.

293. Natural England: has no comment

294. Thames Water:

- Following initial investigations, Thames Water has identified an inability of the existing combined water infrastructure to accommodate the needs of this development proposal. Thames Water request that a condition be added to any planning permission regarding network upgrades or a housing and infrastructure phasing plan.
- TW's other comment can be applied as an informative on any decision.

Officer response: Condition 27 of the OPP requires an impact study to be undertaken to determine the expected demand and a suitable connection point before the construction of each phase commences to be submitted and approved (in consultation with Thames Water). This condition sufficiently addresses this comment, rather than needing any reserved matter approval to include a duplicate condition.

295. Transport for London:

- Plot H7 lies away from the Transport for London Road Network and other TfL assets so there is unlikely to be an adverse impact.
- Strongly support the car free/low Blue Badge parking provision, below the level allowed by the OPP, reflecting local demand.
- Note that cycle store access will be from a number of locations including from Heygate Street, Sayer Street and Hewson Way. All the paved areas around the buildings should generally be available, informally, to cyclists so that they can access cycle parking without having to dismount and walk some distance with their bikes.
- There does not appear to be any on-street short stay cycle parking for the retail/community units on the eastern side. This could be easily addressed with a few suitably located Sheffield stands.
- Some of the cycle stores appear to have convoluted access routes. Two controlled access doors is a recommended maximum, balancing security and minimisation of obstacles, yet all the cycle stores require 3 or 4 doors, 5 in the worst case. Recommend that this is looked at again, to see if the cycle store/corridor layouts could be reconfigured to reduce the numbers of doors needed to be negotiated by cyclists, and that the doors, in any event, should be power assisted.

Officer response to issues raised: The proposal was amended to add visitor cycle stands on the eastern side of the plot. Of the eight cycle stores proposed, three are accessed

from the frontage, and five are accessed through a door from the route around the central servicing yard. Given the drive to make active frontages with commercial uses, this has pushed most of the cycle stores towards the centre of the plot. On balance this is considered to be acceptable.

296. These matters are addressed comprehensively in the relevant preceding parts of this report.

### **Community impact and equalities assessment**

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

298. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

299. 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:

1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
2. 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 connected to that characteristic
  - Take steps to meet 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
3. 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.

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

### **Human rights implications**

301. 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.

302. This application has the legitimate aim of providing details of reserved matters (access, scale, appearance, layout and landscaping) for Plot H7 pursuant to outline planning permission ref. 12/AP/1092. 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.

### **Positive and proactive statement**

303. The council has published its development plan and Core Strategy on its website

together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

304. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.
305. Positive and proactive engagement: summary table

Was the pre-application service used for this application?	Yes
If the pre-application service was used for this application, was the advice given followed?	Yes
Was the application validated promptly?	Yes
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	Yes
To help secure a timely decision, did the case officer submit their recommendation in advance of the statutory determination date?	No

## CONCLUSION

306. This reserved matters application for Plot H7 is made pursuant to the outline planning permission for the mixed-use redevelopment of Elephant Park. The proposal accords with the approved parameters (as amended by two recent NMAs) and the principal design controls established by the outline permission. The massing, form and architecture of the tower and the mansion blocks are considered to be of a high standard, complementing and adding to the emerging character of Elephant Park. The proposal would not harm the setting of heritage assets, nor harm the LVMF or proposed borough view.
307. The reconciliation information provided shows how it contributes towards and does not compromise the overall delivery of site-wide objectives secured for Elephant Park. The retail units on the western side of the plot would form the final portion of the new Sayer Street shopping area. The retail units along the park side would be similar to those on the northern side of the park to provide shopping, food and beverage offer. Two further units on the Heygate Street frontage would add to those in neighbouring plots fronting this main road, and could be used for retail, leisure or community uses. The plot would contribute towards the provision of affordable retail space required by the 2013 section 106 agreement.
308. The 424 flats proposed would contribute towards the borough's housing targets. The high density scheme is similar to the densities of other plots in Elephant Park, and the design displays indicators of an exemplary quality. All flats have a private amenity space, and residents would have access to the communal podium garden, to the roof terraces and to the adjacent new public park. The 72 affordable units would contribute towards the site-wide requirement for 25% affordable housing set by the 2013 outline permission. As the final plot to contain residential units, the quantum of affordable housing achieved across

Elephant Park exceeds the 25% requirement.

309. The massing of the proposal would cause a noticeable reduction in daylight levels to certain units in neighbouring plots (occupied plots and future Plot H11B), and a limited number of sunlight losses. These are broadly in line with the impacts and resulting daylight levels anticipated by the outline planning permission (particularly to Plot H2) and many of the affected units are dual aspect. The proposal would not cause a material loss of privacy, nor have an overbearing impact.
310. The proposal does not raise transport or highway impacts and the highway works were secured in the 2013 section 106 agreement. The detailed design has taken sufficient considerations of the sustainability aspects and carbon reduction as set by the OPP, and conditions relating to Code for Sustainable Homes would still apply.
311. Subject to the proposed conditions, it is recommended that this reserved matters application for Plot H7 be approved.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 1412 Council website: www.southwark.gov.uk

## APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Relevant planning history
Appendix 4	Recommendation
Appendix 5	Engagement summary for the development consultation charter

**AUDIT TRAIL**

<b>Lead Officer</b>	Simon Bevan, Director of Planning	
<b>Report Author</b>	Victoria Crosby, Team Leader	
<b>Version</b>	Final	
<b>Dated</b>	11 February 2020	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>		11 February 2020



**APPENDIX 1****Consultation undertaken**

**Site notice date:** 03/05/2019

**Press notice date:** 02/05/2019

**Case officer site visit date:** 03/05/2019

**Neighbour consultation letters sent:** 02/05/2019

**Internal services consulted**

Environmental Protection Team

Flood Risk Management & Urban Drainage

Highways Development and Management

Local Economy Team

Waste Management

Ecology

Archaeology

Design and Conservation Team

Urban Forester

Transport Policy

Planning Policy

**Statutory and non-statutory organisations**

Environment Agency

Thames Water

Transport for London

Great London Authority

EDF Energy

London Fire & Emergency Planning Authority

London Underground

Metropolitan Police Service (Designing Out Crime)

Natural England

**Neighbour and local groups consulted:**

Flat 602 Stock House 29 Wansey Street  
Flat 601 Stock House 29 Wansey Street  
Flat 701 Stock House 29 Wansey Street  
Flat 605 Stock House 29 Wansey Street  
Flat 302 Stock House 29 Wansey Street  
Flat 203 Stock House 29 Wansey Street  
Flat 202 Stock House 29 Wansey Street  
Flat 201 Stock House 29 Wansey Street  
Apartment 204 Tarling House 3 Walworth Square  
Apartment 203 Tarling House 3 Walworth Square  
Apartment 202 Tarling House 3 Walworth Square  
Apartment 405 Tarling House 3 Walworth Square  
Apartment 101 Hurlock Heights 4 Deacon Street  
135 Walworth Road London SE17 1RW  
133 Walworth Road London SE17 1RW  
131 Walworth Road London SE17 1RW  
141 Walworth Road London SE17 1RW  
139 Walworth Road London SE17 1RW  
137 Walworth Road London SE17 1RW  
30 Heygate Street London SE17 1FP  
28 Heygate Street London SE17 1FP  
Flat 203 Drake Apartments 26 Heygate Street  
Flat 202 Drake Apartments 26 Heygate Street  
Flat 201 Drake Apartments 26 Heygate Street  
Flat 704 Drake Apartments 26 Heygate Street  
10 Heygate Street London SE17 1FP  
8 Heygate Street London SE17 1FP  
4 Heygate Street London SE17 1FP  
Flat 306 Siddal Apartments 6 Heygat  
Flat 305 Siddal Apartments 6 Heygat  
Flat 304 Siddal Apartments 6 Heygat  
Apartment 1905 Hurlock Heights 4 Deacon Street  
Apartment 1904 Hurlock Heights 4 Deacon Street  
Apartment 2001 Hurlock Heights 4 Deacon Street  
Apartment 1908 Hurlock Heights 4 Deacon Street  
Apartment 1907 Hurlock Heights 4 Deacon Street  
Flat 603 Stock House 29 Wansey Street  
Apartment 1803 Hurlock Heights 4 Deacon Street  
Apartment 1802 Hurlock Heights 4 Deacon Street  
Apartment 1706 Hurlock Heights 4 Deacon Street  
Apartment 1702 Hurlock Heights 4 Deacon Street  
Apartment 1701 Hurlock Heights 4 Deacon Street  
Flat 604 Stock House 29 Wansey Street  
Flat 505 Stock House 29 Wansey Street  
Flat 501 Stock House 29 Wansey Street  
Flat 405 Stock House 29 Wansey Street  
Flat 404 Stock House 29 Wansey Street  
Flat 504 Stock House 29 Wansey Street  
Flat 503 Stock House 29 Wansey Street  
Flat 502 Stock House 29 Wansey Street  
Apartment 103 Tarling House 3 Walworth Square  
Apartment 102 Tarling House 3 Walworth Square  
Apartment 101 Tarling House 3 Walworth Square  
Apartment 106 Tarling House 3 Walworth Square  
Apartment 105 Tarling House 3 Walworth Square

Apartment 104 Tarling House 3 Walworth Square  
Concierge Office Hurlock Heights 4 Deacon Street  
Flat 704 Stock House 29 Wansey Street  
Flat 703 Stock House 29 Wansey Street  
Flat 702 Stock House 29 Wansey Street  
4 Sayer Street London SE17 1FG  
2 Sayer Street London SE17 1FG  
Flat 705 Stock House 29 Wansey Street  
Flat 1501 Baldwin Point 6 Sayer Street  
Flat 1408 Baldwin Point 6 Sayer Street  
Flat 1407 Baldwin Point 6 Sayer Street  
Apartment 3004 Hurlock Heights 4 Deacon Street  
Apartment 3003 Hurlock Heights 4 Deacon Street  
Flat 1502 Baldwin Point 6 Sayer Street  
Flat 1406 Baldwin Point 6 Sayer Street  
Flat 1402 Baldwin Point 6 Sayer Street  
Flat 1401 Baldwin Point 6 Sayer Street  
Flat 1308 Baldwin Point 6 Sayer Street  
Flat 1405 Baldwin Point 6 Sayer Street  
Flat 1404 Baldwin Point 6 Sayer Street  
Flat 1403 Baldwin Point 6 Sayer Street  
Flat 305 Stock House 29 Wansey Street  
Flat 304 Stock House 29 Wansey Street  
Flat 303 Stock House 29 Wansey Street  
Flat 403 Stock House 29 Wansey Street  
Flat 402 Stock House 29 Wansey Street  
Flat 401 Stock House 29 Wansey Street  
Apartment 2201 Hurlock Heights 4 Deacon Street  
Apartment 2108 Hurlock Heights 4 Deacon Street  
Apartment 2107 Hurlock Heights 4 Deacon Street  
Apartment 2204 Hurlock Heights 4 Deacon Street  
Flat 301 Stock House 29 Wansey Street  
Flat 205 Stock House 29 Wansey Street  
Flat 204 Stock House 29 Wansey Street  
Apartment 103 Ferraro House 149 Walworth Road  
Apartment 102 Ferraro House 149 Walworth Road  
Apartment 101 Ferraro House 149 Walworth Road  
Apartment 106 Ferraro House 149 Walworth Road  
Apartment 105 Ferraro House 149 Walworth Road  
Apartment 104 Ferraro House 149 Walworth Road  
1 Walworth Square London SE17 1GA  
Apartment 503 Tarling House 3 Walworth Square  
Apartment 502 Tarling House 3 Walworth Square  
Apartment 501 Tarling House 3 Walworth Square  
Apartment 506 Tarling House 3 Walworth Square  
Apartment 505 Tarling House 3 Walworth Square  
Apartment 504 Tarling House 3 Walworth Square  
Apartment 302 Ferraro House 149 Walworth Road  
Apartment 301 Ferraro House 149 Walworth Road  
Apartment 207 Ferraro House 149 Walworth Road  
Apartment 305 Ferraro House 149 Walworth Road  
Apartment 304 Ferraro House 149 Walworth Road  
Apartment 303 Ferraro House 149 Walworth Road  
Apartment 206 Ferraro House 149 Walworth Road  
Apartment 202 Ferraro House 149 Walworth Road

Apartment 201 Ferraro House 149 Walworth Road  
Apartment 107 Ferraro House 149 Walworth Road  
Apartment 205 Ferraro House 149 Walworth Road  
Apartment 204 Ferraro House 149 Walworth Road  
Apartment 203 Ferraro House 149 Walworth Road  
Apartment 208 Tarling House 3 Walworth Square  
Apartment 207 Tarling House 3 Walworth Square  
Apartment 206 Tarling House 3 Walworth Square  
Apartment 303 Tarling House 3 Walworth Square  
Apartment 302 Tarling House 3 Walworth Square  
Apartment 301 Tarling House 3 Walworth Square  
Apartment 205 Tarling House 3 Walworth Square  
Apartment 201 Tarling House 3 Walworth Square  
Apartment 108 Tarling House 3 Walworth Square  
Apartment 107 Tarling House 3 Walworth Square  
Apartment 707 Hurlock Heights 4 Deacon Street  
Apartment 706 Hurlock Heights 4 Deacon Street  
Apartment 705 Hurlock Heights 4 Deacon Street  
Apartment 304 Hurlock Heights 4 Deacon Street  
Apartment 404 Tarling House 3 Walworth Square  
Apartment 403 Tarling House 3 Walworth Square  
Apartment 408 Tarling House 3 Walworth Square  
Apartment 407 Tarling House 3 Walworth Square  
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Apartment 402 Tarling House 3 Walworth Square  
Apartment 306 Tarling House 3 Walworth Square  
Apartment 305 Tarling House 3 Walworth Square  
Apartment 304 Tarling House 3 Walworth Square  
Apartment 401 Tarling House 3 Walworth Square  
Apartment 308 Tarling House 3 Walworth Square  
Apartment 307 Tarling House 3 Walworth Square  
Flat 503 Baldwin Point 6 Sayer Street  
Flat 502 Baldwin Point 6 Sayer Street  
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Flat 506 Baldwin Point 6 Sayer Street  
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Flat 409 Baldwin Point 6 Sayer Street  
Flat 405 Baldwin Point 6 Sayer Street  
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Flat 703 Baldwin Point 6 Sayer Street  
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Flat 605 Baldwin Point 6 Sayer Street  
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Flat 603 Baldwin Point 6 Sayer Street  
Flat 602 Baldwin Point 6 Sayer Street  
Flat 204 Baldwin Point 6 Sayer Street  
Flat 203 Baldwin Point 6 Sayer Street  
Apartment 1407 Hurlock Heights 4 Deacon Street  
Apartment 1406 Hurlock Heights 4 Deacon Street  
Apartment 1405 Hurlock Heights 4 Deacon Street  
Apartment 1502 Hurlock Heights 4 Deacon Street  
Apartment 1003 Walton Heights 143 Walworth Road  
Apartment 1002 Walton Heights 143 Walworth Road  
Apartment 1303 Walton Heights 143 Walworth Road  
Apartment 1302 Walton Heights 143 Walworth Road  
Apartment 1301 Walton Heights 143 Walworth Road  
42B Wansey Street London SE17 1JP  
42A Wansey Street London SE17 1JP  
56A Wansey Street London SE17 1JP  
54B Wansey Street London SE17 1JP  
54A Wansey Street London SE17 1JP  
68A Wansey Street London SE17 1JP  
48 Wansey Street London SE17 1JP  
46A Wansey Street London SE17 1JP  
Apartment 1701 Walton Heights 143 Walworth Road  
Apartment 1605 Walton Heights 143 Walworth Road  
Apartment 403 Barnard House 34 Heygate Street  
Apartment 402 Barnard House 34 Heygate Street  
Apartment 401 Barnard House 34 Heygate Street  
Apartment 406 Barnard House 34 Heygate Street  
Apartment 202 Barnard House 34 Heygate Street  
Apartment 207 Barnard House 34 Heygate Street  
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Apartment 201 Barnard House 34 Heygate Street  
Apartment 104 Barnard House 34 Heygate Street  
Apartment 804 Barnard House 34 Heygate Street  
Apartment 706 Barnard House 34 Heygate Street  
Apartment 702 Barnard House 34 Heygate Street  
Apartment 701 Barnard House 34 Heygate Street  
Apartment 606 Barnard House 34 Heygate Street  
Apartment 705 Barnard House 34 Heygate Street  
Flat 202 Sir John Soane Apartments 20 Heygate Street  
Flat 302 Sir John Soane Apartments 20 Heygate Street  
Flat 301 Sir John Soane Apartments 20 Heygate Street  
Flat 205 Sir John Soane Apartments 20 Heygate Street  
Flat 503 Siddal Apartments 6 Heygat  
Flat 502 Siddal Apartments 6 Heygat  
Flat 604 Sir John Soane Apartments 20 Heygate Street  
Flat 603 Sir John Soane Apartments 20 Heygate Street  
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Flat 502 Sir John Soane Apartments 20 Heygate Street  
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Flat 405 Sir John Soane Apartments 20 Heygate Street

Flat 505 Sir John Soane Apartments 20 Heygate Street  
Flat 504 Sir John Soane Apartments 20 Heygate Street  
Flat 503 Sir John Soane Apartments 20 Heygate Street  
43 Wansey Street London SE17 1FF  
41 Wansey Street London SE17 1FF  
39 Wansey Street London SE17 1FF  
49 Wansey Street London SE17 1FF  
47 Wansey Street London SE17 1FF  
45 Wansey Street London SE17 1FF  
37 Wansey Street London SE17 1FF  
Flat 705 Sir John Soane Apartments 20 Heygate Street  
Flat 704 Sir John Soane Apartments 20 Heygate Street  
Flat 703 Sir John Soane Apartments 20 Heygate Street  
35 Wansey Street London SE17 1FF  
33 Wansey Street London SE17 1FF  
31 Wansey Street London SE17 1FF  
Basement Flat 28 Wansey Street London  
Ground Floor Flat 28 Wansey Street London  
32A Wansey Street London SE17 1JP  
30B Wansey Street London SE17 1JP  
26A Wansey Street London SE17 1LH  
Flat 31 Garland Court 26 Wansey Street  
Flat 27 Garland Court 26 Wansey Street  
Flat 26 Garland Court 26 Wansey Street  
Flat 25 Garland Court 26 Wansey Street  
Flat 30 Garland Court 26 Wansey Street  
Flat 29 Garland Court 26 Wansey Street  
Flat 28 Garland Court 26 Wansey Street  
32 Heygate Street London SE17 1FP  
24 Heygate Street London SE17 1FP  
4 Bodley Way London SE17 1FF  
2 Bodley Way London SE17 1FF  
32B Wansey Street London SE17 1JP  
10 Bodley Way London SE17 1FF  
8 Bodley Way London SE17 1FF  
6 Bodley Way London SE17 1FF  
Flat 8 Garland Court 26 Wansey Street  
Flat 7 Garland Court 26 Wansey Street  
Flat 6 Garland Court 26 Wansey Street  
Flat 11 Garland Court 26 Wansey Street  
Flat 10 Garland Court 26 Wansey Street  
Flat 9 Garland Court 26 Wansey Street  
Flat 5 Garland Court 26 Wansey Street  
Flat 1 Garland Court 26 Wansey Street  
28A Wansey Street London SE17 1JP  
30A Wansey Street London SE17 1JP  
Flat 4 Garland Court 26 Wansey Street  
Flat 3 Garland Court 26 Wansey Street  
Flat 2 Garland Court 26 Wansey Street  
Flat 21 Garland Court 26 Wansey Street  
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Flat 19 Garland Court 26 Wansey Street  
Flat 24 Garland Court 26 Wansey Street  
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Flat 18 Garland Court 26 Wansey Street  
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Flat 12 Garland Court 26 Wansey Street  
Flat 17 Garland Court 26 Wansey Street  
Flat 16 Garland Court 26 Wansey Street  
Flat 15 Garland Court 26 Wansey Street  
Flat 201 Siddal Apartments 6 Heygat  
14 Bodley Way London SE17 1FF  
12 Bodley Way London SE17 1FF  
Flat 204 Siddal Apartments 6 Heygat  
Flat 203 Siddal Apartments 6 Heygat  
Flat 202 Siddal Apartments 6 Heygat  
12 Heygate Street London SE17 1FP  
2 Heygate Street London SE17 1FP  
Flat 705 Drake Apartments 26 Heygate Street  
Flat 401 Siddal Apartments 6 Heygat  
Flat 308 Siddal Apartments 6 Heygat  
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Flat 303 Siddal Apartments 6 Heygat  
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Flat 301 Siddal Apartments 6 Heygat  
Flat 208 Siddal Apartments 6 Heygat  
Flat 402 Drake Apartments 26 Heygate Street  
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Flat 405 Drake Apartments 26 Heygate Street  
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Flat 304 Drake Apartments 26 Heygate Street  
Flat 101 Drake Apartments 26 Heygate Street  
Flat 205 Drake Apartments 26 Heygate Street  
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Flat 303 Drake Apartments 26 Heygate Street  
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Flat 301 Drake Apartments 26 Heygate Street  
Flat 605 Drake Apartments 26 Heygate Street  
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Flat 603 Drake Apartments 26 Heygate Street  
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Flat 702 Drake Apartments 26 Heygate Street  
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Flat 503 Drake Apartments 26 Heygate Street  
Flat 502 Drake Apartments 26 Heygate Street  
Flat 501 Drake Apartments 26 Heygate Street  
Flat 601 Drake Apartments 26 Heygate Street  
Flat 505 Drake Apartments 26 Heygate Street  
Flat 504 Drake Apartments 26 Heygate Street  
Apartment 202 Hurlock Heights 4 Deacon Street  
Apartment 1906 Hurlock Heights 4 Deacon Street  
Apartment 1903 Hurlock Heights 4 Deacon Street









Apartment 901 Hurlock Heights 4 Deacon Street  
Apartment 808 Hurlock Heights 4 Deacon Street  
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Apartment 904 Hurlock Heights 4 Deacon Street  
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Apartment 1105 Hurlock Heights 4 Deacon Street  
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Apartment 1108 Hurlock Heights 4 Deacon Street  
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Apartment 1106 Hurlock Heights 4 Deacon Street  
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Apartment 1005 Hurlock Heights 4 Deacon Street  
Apartment 1004 Hurlock Heights 4 Deacon Street  
Apartment 1101 Hurlock Heights 4 Deacon Street  
Apartment 1008 Hurlock Heights 4 Deacon Street  
Apartment 1007 Hurlock Heights 4 Deacon Street  
Apartment 1306 Walton Heights 143 Walworth Road  
Apartment 1305 Walton Heights 143 Walworth Road  
Apartment 1304 Walton Heights 143 Walworth Road  
Apartment 1206 Walton Heights 143 Walworth Road  
Apartment 1202 Walton Heights 143 Walworth Road  
Apartment 1201 Walton Heights 143 Walworth Road  
Apartment 1106 Walton Heights 143 Walworth Road  
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Apartment 703 Walton Heights 143 Walworth Road  
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Apartment 603 Walton Heights 143 Walworth Road  
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Apartment 506 Walton Heights 143 Walworth Road  
Apartment 901 Walton Heights 143 Walworth Road  
Apartment 806 Walton Heights 143 Walworth Road  
Apartment 805 Walton Heights 143 Walworth Road  
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Apartment 902 Walton Heights 143 Walworth Road  
Apartment 804 Walton Heights 143 Walworth Road  
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Apartment 705 Walton Heights 143 Walworth Road  
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Apartment 803 Walton Heights 143 Walworth Road  
Apartment 802 Walton Heights 143 Walworth Road  
Apartment 801 Walton Heights 143 Walworth Road

44 Wansey Street London SE17 1JP  
40 Wansey Street London SE17 1JP  
64 Wansey Street London SE17 1JP  
62 Wansey Street London SE17 1JP  
50 Wansey Street London SE17 1JP  
Flat 2 66 Wansey Street London  
68B Wansey Street London SE17 1JP  
46B Wansey Street London SE17 1JP  
Flat 3 66 Wansey Street London  
Flat 1 66 Wansey Street London  
58B Wansey Street London SE17 1JP  
58A Wansey Street London SE17 1JP  
56B Wansey Street London SE17 1JP  
Flat 4 66 Wansey Street London  
60B Wansey Street London SE17 1JP  
60A Wansey Street London SE17 1JP  
Apartment 1504 Walton Heights 143 Walworth Road  
Apartment 1503 Walton Heights 143 Walworth Road  
Apartment 1502 Walton Heights 143 Walworth Road  
Apartment 1601 Walton Heights 143 Walworth Road  
Apartment 1506 Walton Heights 143 Walworth Road  
Apartment 1505 Walton Heights 143 Walworth Road  
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Apartment 1406 Walton Heights 143 Walworth Road  
Apartment 1405 Walton Heights 143 Walworth Road  
Apartment 1404 Walton Heights 143 Walworth Road  
10 Sayer Street London SE17 1FH  
8B Sayer Street London SE17 1FH  
Apartment 1704 Walton Heights 143 Walworth Road  
38 Wansey Street London SE17 1JP  
36 Wansey Street London SE17 1JP  
34 Wansey Street London SE17 1JP  
Apartment 1703 Walton Heights 143 Walworth Road  
Apartment 1604 Walton Heights 143 Walworth Road  
Apartment 1603 Walton Heights 143 Walworth Road  
Apartment 1602 Walton Heights 143 Walworth Road  
Apartment 1702 Walton Heights 143 Walworth Road  
Apartment 405 Barnard House 34 Heygate Street  
Apartment 404 Barnard House 34 Heygate Street  
Apartment 307 Barnard House 34 Heygate Street  
Apartment 303 Barnard House 34 Heygate Street  
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Apartment 506 Barnard House 34 Heygate Street  
Apartment 502 Barnard House 34 Heygate Street  
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Apartment 407 Barnard House 34 Heygate Street  
Apartment 505 Barnard House 34 Heygate Street  
Apartment 504 Barnard House 34 Heygate Street  
Apartment 503 Barnard House 34 Heygate Street  
5 Sayer Street London SE17 1FY  
3 Sayer Street London SE17 1FY  
1 Sayer Street London SE17 1FY  
Apartment 101 Barnard House 34 Heygate Street  
9 Sayer Street London SE17 1FY  
7 Sayer Street London SE17 1FY  
Apartment 406 Ferraro House 149 Walworth Road  
Apartment 402 Ferraro House 149 Walworth Road  
Apartment 401 Ferraro House 149 Walworth Road  
Apartment 307 Ferraro House 149 Walworth Road  
Apartment 405 Ferraro House 149 Walworth Road  
Apartment 404 Ferraro House 149 Walworth Road  
Apartment 403 Ferraro House 149 Walworth Road  
Apartment 204 Barnard House 34 Heygate Street  
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Apartment 103 Barnard House 34 Heygate Street  
Apartment 102 Barnard House 34 Heygate Street  
Apartment 107 Barnard House 34 Heygate Street  
Apartment 106 Barnard House 34 Heygate Street  
Apartment 105 Barnard House 34 Heygate Street  
Apartment 204 Walton Heights 143 Walworth Road  
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Apartment 202 Walton Heights 143 Walworth Road  
Apartment 301 Walton Heights 143 Walworth Road  
Apartment 206 Walton Heights 143 Walworth Road  
Apartment 205 Walton Heights 143 Walworth Road  
Apartment 201 Walton Heights 143 Walworth Road  
Apartment 102 Walton Heights 143 Walworth Road  
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147 Walworth Road London SE17 1FZ  
Apartment 105 Walton Heights 143 Walworth Road  
Apartment 104 Walton Heights 143 Walworth Road  
Apartment 103 Walton Heights 143 Walworth Road  
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Apartment 401 Walton Heights 143 Walworth Road  
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Apartment 803 Barnard House 34 Heygate Street  
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Apartment 801 Barnard House 34 Heygate Street  
Apartment 806 Barnard House 34 Heygate Street  
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Apartment 704 Barnard House 34 Heygate Street  
Apartment 703 Barnard House 34 Heygate Street  
Apartment 1004 Barnard House 34 Heygate Street  
Apartment 1003 Barnard House 34 Heygate Street  
Apartment 1002 Barnard House 34 Heygate Street  
145 Walworth Road London SE17 1FZ  
Apartment 1006 Barnard House 34 Heygate Street  
Apartment 1005 Barnard House 34 Heygate Street  
Apartment 1001 Barnard House 34 Heygate Street  
Apartment 903 Barnard House 34 Heygate Street  
Apartment 902 Barnard House 34 Heygate Street  
Apartment 901 Barnard House 34 Heygate Street  
Apartment 906 Barnard House 34 Heygate Street  
Apartment 905 Barnard House 34 Heygate Street  
Apartment 904 Barnard House 34 Heygate Street  
Apartment 2903 Hurlock Heights 4 Deacon Street  
18 Heygate Street London SE17 1FP  
16 Heygate Street London SE17 1FP  
14 Heygate Street London SE17 1FP  
Flat 201 Sir John Soane Apartments 20 Heygate Street  
Flat 101 Sir John Soane Apartments 20 Heygate Street  
22 Heygate Street London SE17 1FP  
Flat 802 Siddal Apartments 6 Heygat  
Flat 706 Siddal Apartments 6 Heygat  
Flat 705 Siddal Apartments 6 Heygat  
Flat 704 Siddal Apartments 6 Heygat  
Flat 801 Siddal Apartments 6 Heygat  
Flat 708 Siddal Apartments 6 Heygat  
Flat 707 Siddal Apartments 6 Heygat  
Flat 401 Sir John Soane Apartments 20 Heygate Street  
Flat 305 Sir John Soane Apartments 20 Heygate Street  
Flat 304 Sir John Soane Apartments 20 Heygate Street  
Flat 404 Sir John Soane Apartments 20 Heygate Street  
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Flat 303 Sir John Soane Apartments 20 Heygate Street  
Flat 204 Sir John Soane Apartments 20 Heygate Street  
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Flat 501 Siddal Apartments 6 Heygat  
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Flat 408 Siddal Apartments 6 Heygat  
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Flat 603 Siddal Apartments 6 Heygat  
Flat 602 Siddal Apartments 6 Heygat  
69 Wansey Street London SE17 1FF  
67 Wansey Street London SE17 1FF  
65 Wansey Street London SE17 1FF  
6 Deacon Street London SE17 1GD  
73 Wansey Street London SE17 1FF  
71 Wansey Street London SE17 1FF  
63 Wansey Street London SE17 1FF  
55 Wansey Street London SE17 1FF  
53 Wansey Street London SE17 1FF  
51 Wansey Street London SE17 1FF  
61 Wansey Street London SE17 1FF  
59 Wansey Street London SE17 1FF  
57 Wansey Street London SE17 1FF  
Apartment 104 Hurlock Heights 4 Deacon Street  
Apartment 103 Hurlock Heights 4 Deacon Street  
Apartment 102 Hurlock Heights 4 Deacon Street  
Apartment 201 Hurlock Heights 4 Deacon Street  
Apartment 106 Hurlock Heights 4 Deacon Street  
Apartment 105 Hurlock Heights 4 Deacon Street  
Flat 202 Baldwin Point 6 Sayer Street  
Flat 207 Baldwin Point 6 Sayer Street  
Flat 206 Baldwin Point 6 Sayer Street  
Flat 1205 Baldwin Point 6 Sayer Street  
Flat 1204 Baldwin Point 6 Sayer Street  
Flat 205 Baldwin Point 6 Sayer Street  
Flat 201 Baldwin Point 6 Sayer Street  
Apartment 2906 Hurlock Heights 4 Deacon Street  
Apartment 2905 Hurlock Heights 4 Deacon Street  
Apartment 2904 Hurlock Heights 4 Deacon Street  
8A Sayer Street London SE17 1FH  
Apartment 3002 Hurlock Heights 4 Deacon Street  
Apartment 3001 Hurlock Heights 4 Deacon Street  
Flat 308 Baldwin Point 6 Sayer Street  
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Flat 402 Baldwin Point 6 Sayer Street  
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Flat 209 Baldwin Point 6 Sayer Street  
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Flat 304 Baldwin Point 6 Sayer Street  
Flat 303 Baldwin Point 6 Sayer Street  
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Flat 1107 Baldwin Point 6 Sayer Street  
Flat 1106 Baldwin Point 6 Sayer Street  
Flat 1105 Baldwin Point 6 Sayer Street  
Flat 1202 Baldwin Point 6 Sayer Street  
Flat 1201 Baldwin Point 6 Sayer Street  
Flat 1108 Baldwin Point 6 Sayer Street  
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Flat 1006 Baldwin Point 6 Sayer Street  
Flat 1103 Baldwin Point 6 Sayer Street  
Flat 1102 Baldwin Point 6 Sayer Street  
Flat 1101 Baldwin Point 6 Sayer Street  
Flat 1304 Baldwin Point 6 Sayer Street  
Flat 1303 Baldwin Point 6 Sayer Street  
Flat 1302 Baldwin Point 6 Sayer Street  
Flat 1307 Baldwin Point 6 Sayer Street  
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Flat 1301 Baldwin Point 6 Sayer Street  
Flat 1203 Baldwin Point 6 Sayer Street  
Flat 1208 Baldwin Point 6 Sayer Street  
Flat 1207 Baldwin Point 6 Sayer Street  
Flat 1206 Baldwin Point 6 Sayer Street  
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Flat 707 Baldwin Point 6 Sayer Street  
Flat 1002 Baldwin Point 6 Sayer Street  
Flat 1001 Baldwin Point 6 Sayer Street  
Flat 909 Baldwin Point 6 Sayer Street  
Flat 1005 Baldwin Point 6 Sayer Street  
Flat 1004 Baldwin Point 6 Sayer Street  
Flat 1003 Baldwin Point 6 Sayer Street  
Flat 908 Baldwin Point 6 Sayer Street  
Flat 904 Baldwin Point 6 Sayer Street  
Flat 903 Baldwin Point 6 Sayer Street  
Flat 902 Baldwin Point 6 Sayer Street  
Flat 907 Baldwin Point 6 Sayer Street  
Flat 906 Baldwin Point 6 Sayer Street  
Flat 905 Baldwin Point 6 Sayer Street  
Apartment 306 Ferraro House 149 Walworth Road  
Apartment 1102 Walton Heights 143 Walworth Road  
Apartment 1101 Walton Heights 143 Walworth Road  
Apartment 1006 Walton Heights 143 Walworth Road  
Apartment 1105 Walton Heights 143 Walworth Road



Apartment 1104 Walton Heights 143 Walworth Road  
Apartment 1103 Walton Heights 143 Walworth Road  
Apartment 1005 Walton Heights 143 Walworth Road  
Apartment 1001 Walton Heights 143 Walworth Road  
Apartment 906 Walton Heights 143 Walworth Road  
Apartment 905 Walton Heights 143 Walworth Road  
Apartment 1004 Walton Heights 143 Walworth Road

**Re-consultation**

**APPENDIX 2****Consultation responses received****Internal services consulted**

Environmental Protection Team  
 Flood Risk Management & Urban Drainage  
 Highways Development and Management  
 Local Economy Team  
 Ecology  
 Archaeology  
 Design and Conservation Team [Formal]  
 Urban Forester  
 Transport Policy

**Statutory and non-statutory organisations**

Environment Agency  
 Thames Water  
 Transport for London  
 London Underground  
 Metropolitan Police Service (Designing Out Crime)  
 Natural England

**Neighbour and local groups consulted:**

272A Walworth Road London SE17 2HY  
 27 Inville Road London SE17 2HT  
 Apt 1009 8 Walworth Road London  
 27 Reading House Friary Estate London SE15 1RS  
 3 Kiebs Way London SE17 2FU  
 56 Frankfurt Road Herne Hill London  
 Flat 110, 9 Steedman Street London SE17 3BA  
 162 Crampton Street London SE173AE  
 35 Edge End Road Broadstairs CT10 2AH  
 28 Dover Flats Old Kent Road London  
 Flat 6, Milner Court, 9 Colegrove Road London  
 82 Douglas Buildings London SE1 1JW  
 Flat 85C Balfour Street London  
 16 Addington SQ Southwark London  
 56 Crampton St London SE173AE  
 56 Crampton St London SE173AE  
 18 Malfort Road Camberwell London  
 162 Crampton Street London SE17 3AE  
 3 Credenhill House London SE15 1BG  
 3 Credenhill House London SE15 1BG  
 15 Hamilton Square London SE1 3SB  
 Flat 601 9 Steedman Street London  
 105 Chiltern Portland Street London  
 139A Camberwell Grove London SE5 8JH  
 35, Arrol House Rockingham St. London  
 12 Albert Barnes House, New Kent Road London SE1 6PH  
 9 Chenies Street London WC1E7ET

## RELEVANT PLANNING HISTORY

Reference and Proposal	Status
<p><b>19/AP/0026</b> Request for a Screening Opinion to determine the need for a supplementary Environmental Statement to accompany the Reserved Matters Application for the Plot H7 (part of MP5) of Elephant Park (formerly referred to as the 'Heygate Masterplan') submitted pursuant to outline planning permission ref. 12/AP/1092.</p>	<p>Screening Opinion 24/01/2019</p>
<p><b>19/AP/0025</b> Discharge of paragraph 5.3.2 of Schedule 3, Updated Affordable Housing Strategy in relation to Plot H7 (part of MP5) pursuant to the s106 agreement associated with outline permission ref. 12/AP/1092 granted 27/03/2013 (for: Redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 160,579sqm GEA (min) and 254,400sqm GEA (max) residential floorspace together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works).</p>	<p>Agreed 15/02/2019</p>
<p><b>19/AP/0245</b> Discharge of paragraph 26.6 of Schedule 3, Plot Specific Energy Strategy for Plot H7 (part of MP5), pursuant to the s106 agreement associated with outline permission ref. 12/AP/1092 granted 27/03/2013 (for: Redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 160,579sqm GEA (min) and 254,400sqm GEA (max) residential floorspace together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works).</p>	<p>Agreed 08/03/2019</p>
<p><b>19/AP/0952</b> Non-material amendments to outline planning permission ref. 12/AP/1092 granted 27/03/2013 (for redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 160,579sqm GEA (min) and 254,000sqm GEA (max) residential floorspace together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works) to make the following changes to plot H7: - Amendments to the extent and height of the podium; - Amendment to the maximum plot component extents to allow balcony projections into the courtyard, and; - Amendment to the maximum height of blocks B, D and E to allow localised breaches for lift overruns and projections in the crown of the tower.</p>	<p>Agreed 30/05/2019</p>
<p><b>18/EQ/0268</b> Application for the approval of reserved matters (access, scale, appearance, layout and landscaping) for Plot H7 within phase MP5 of the Elephant Park (previously referred to as the Heygate Masterplan), submitted pursuant to the outline planning permission ref. 12/AP/1092. The proposals comprise the construction of a development plot comprising residential development (C3), with retail (A1, A2, A3, A4 A5), business (B1) and community and leisure (D1/D2) uses at ground, with cycle storage, servicing, plant areas, new landscaping and other associated works.</p>	<p>Pre-Application Enquiry Closed 28/02/2019</p>

<p><b>12/AP/1092</b> Outline application for: Redevelopment to provide a mixed use development comprising a number of buildings ranging between 13.13m (AOD) and 104.8m (AOD) in height with capacity for between 160,579sqm GEA (min) and 254,000sqm GEA (max) residential floorspace together with retail (Class A1-A5), business (Class B1), leisure and community (Class D2 and D1), energy centre (sui generis) uses. New landscaping, park and public realm, car parking, means of access and other associated works).</p>	<p>Granted with Legal Agreement 27/03/2013</p>
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## RECOMMENDATION

This document shows the case officer's recommended decision for the application referred to below.  
This document is not a decision notice for this application.

<b>Applicant</b>	Lend Lease Elephant & Castle Limited	<b>Reg. Number</b>	19/AP/1166
<b>Application Type</b>	Approval of Reserved Matters	<b>Case Number</b>	H1064A
<b>Recommendation</b>	Reserved Matters - GRANTED		

### Draft of Decision Notice

#### Approval of Reserved Matters was GRANTED for the following development:

Application for the approval of reserved matters (access, scale, appearance, layout and landscaping) for Plot H7 within Elephant Park (previously referred to as the Heygate Masterplan), submitted pursuant to Outline Planning Permission ref: 12/AP/1092. The proposal comprises the construction of a development plot ranging between 9 and 25 storeys in height (maximum building height 86.75 m AOD), comprising 424 residential units, 1,237sqm (GEA) of flexible retail (Classes A1 - A5) uses and 628 sqm (GEA) flexible retail, community and leisure (Classes A1-A5, D1-D2), car parking, cycle storage, servicing, plant areas, landscaping, public realm, and other associated works.

Plot H7 Heygate Street Within Land Bounded By Elephant Park To The North Plot H2 To The West Heygate Street To The South And H11B To The East London SE17

**In accordance with application received on 5 April 2019**

and Applicant's Drawing Nos.:

#### Proposed Plans

Proposed Ground - Levels Plan 251797-A100-H7X-01-PL-00-0150 P01 received 05/04/2019  
 Proposed GA Plan - Ground Level 251797-A100-H7X-20-PL-00-0100 P05 received 27/01/2020  
 Proposed GA Plan - Level 01 251797-A100-H7X-20-PL-01-0101 P03 received 27/01/2020  
 Proposed GA Plan - Level 02 251797-A100-H7X-20-PL-02-0102 P03 received 27/01/2020  
 Proposed GA Plan - Level 03-05 251797-A100-H7X-20-PL-ZZ-0103 P03 received 27/01/2020  
 Proposed GA Plan - Level 06-08 251797-A100-H7X-20-PL-ZZ-0106 P03 received 27/01/2020  
 Proposed GA Plan - Level 09 251797-A100-H7X-20-PL-09-0109 P01 received 05/04/2019  
 Proposed GA Plan - Level 24 251797-A100-H7X-20-PL-24-0124 P01 received 05/04/2019  
 Proposed GA Plan - Roof Plan 251797-A100-H7X-20-PL-ZZ-0125 P01 received 05/04/2019  
 Proposed East and North Elevation 251797-A100-H7X-20-EL-NE2-0210 P01 received 05/04/2019  
 Proposed South Elevation 251797-A100-H7X-20-EL-S2-0211 P05 received 27/01/2020  
 Proposed West Elevation 251797-A100-H7X-20-EL-W2-0212 P01 received 05/04/2019  
 Proposed Internal Elevations - Block A and E 251797-A100-H7X-20-EL-W3-0213 P05 received 03/02/2020  
 Proposed Internal Elevations - Block B and C 251797-A100-H7X-20-EL-NE3-0214 P04 received 27/01/2020  
 Proposed Internal Elevations - Block C and D 251797-A100-H7X-20-EL-E1-0215 P04 received 27/01/2020  
 Proposed North and South Elevations - Block D 251797-A100-H7D-20-EL-NS1-0216 P01 received 05/04/2019  
 Proposed Bay Elevation 1 251797-A100-H7E-20-EL-NE4-0230 P01 received 05/04/2019  
 Proposed Bay Elevation 2 251797-A100-H7C-20-EL-N2-0231 P01 received 05/04/2019  
 Proposed Bay Elevation - Block D 251797-A100-H7D-20-EL-N3-0232 P01 received 05/04/2019  
 Proposed Section A and C 251797-A100-H7X-20-SX-AA-0260 P01 received 05/04/2019  
 Proposed Section C and D 251797-A100-H7X-20-SX-BB-0261 P01 received 05/04/2019  
 Internal Layout - Studio M2 -T01 251797-A100-H7E-26-PL-ZZ-0350 P02 received 03/02/2020  
 Internal Layout - Studio M2 -T02 251797-A100-H7E-26-PL-ZZ-0351 P03 received 27/01/2020  
 Internal Layout - Studio M2 -T03 251797-A100-H7A-26-PL-ZZ-0352 P03 received 27/01/2020

Internal Layout - 1B2P-M2-T01 251797-A100-H7D-26-PL-ZZ-0353 P01 received 05/04/2019  
 Internal Layout - 1B2P-M2-T02 251797-A100-H7B-26-PL-ZZ-0354 P01 received 05/04/2019  
 Internal Layout - 1B2P-M2-T03 251797-A100-H7B-26-PL-ZZ-0355 P03 received 20/01/2020  
 Internal Layout - 1B2P-M2-T04 251797-A100-H7AE-26-PL-ZZ-0356 P01 received 05/04/2019  
 Internal Layout - 1B2P-M2-T05 251797-A100-H7C-26-PL-ZZ-0357 P03 received 27/01/2020  
 Internal Layout - 2B3P-M2-T01 251797-A100-H7B-26-PL-ZZ-0358 P03 received 27/01/2020  
 Internal Layout - 2B3P-M2-T02 251797-A100-H7B-26-PL-ZZ-0359 P01 received 05/04/2019  
 Internal Layout - 2B3P-M2-T03 251797-A100-H7C-26-PL-ZZ-0360 P03 received 27/01/2020  
 Internal Layout - 2B3P-M2-T04 251797-A100-H7C-26-PL-ZZ-0361 P01 received 05/04/2019  
 Internal Layout - 2B3P-M2-T05 251797-A100-H7C-26-PL-ZZ-0362 P03 received 27/01/2020  
 Internal Layout - 2B3P-M3-T06 251797-A100-H7C-26-PL-ZZ-0363 P03 received 27/01/2020  
 Internal Layout - 2B3P-M2-T07 251797-A100-H7A-26-PL-ZZ-0364 P03 received 27/01/2020  
 Internal Layout - 2B3P-M2-T08 251797-A100-H7AE-26-PL-ZZ-0365 P03 received 27/01/2020  
 Internal Layout - 2B3P-M2-T09 251797-A100-H7AE-26-PL-ZZ-0366 P02 received 27/01/2020  
 Internal Layout - 2B3P-M2-T10 251797-A100-H7C-26-PL-ZZ-0367 P03 received 27/01/2020  
 Internal Layout - 2B3P-M2-T11 251797-A100-H7C-26-PL-ZZ-0368 P01 received 05/04/2019  
 Internal Layout - 2B3P-M2-T12 251797-A100-H7C-26-PL-ZZ-0369 P03 received 27/01/2020  
 Internal Layout - 2B3P-M3-T13 251797-A100-H7C-26-PL-ZZ-0370 P03 received 27/01/2020  
 Internal Layout - 2B4P-M2-T01 251797-A100-H7D-26-PL-ZZ-0371 P01 received 05/04/2019  
 Internal Layout - 2B4P-M3-T02 251797-A100-H7C-26-PL-ZZ-0372 P03 received 27/01/2020  
 Internal Layout - 2B4P-M2-T03 251797-A100-H7C-26-PL-ZZ-0373 P03 received 27/01/2019  
 Internal Layout - 2B4P-M2-T04 251797-A100-H7AE-26-PL-ZZ-0374 P01 received 05/04/2019  
 Internal Layout - 2B4P-M2-T05 251797-A100-H7AE-26-PL-ZZ-0375 P01 received 05/04/2019  
 Internal Layout - 2B4P-M2-T06 251797-A100-H7AE-26-PL-ZZ-0376 P01 received 05/04/2019  
 Internal Layout - 2B4P-M2-T07 251797-A100-H7AE-26-PL-ZZ-0377 P01 received 05/04/2019  
 Internal Layout - 2B4P-M2-T08 251797-A100-H7AE-26-PL-ZZ-0378 P03 received 27/01/2020  
 Internal Layout - 2B4P-M2-T09 251797-A100-H7AE-26-PL-ZZ-0379 P01 received 05/04/2019  
 Internal Layout - 2B4P-M2-T10 251797-A100-H7C-26-PL-ZZ-0380 P03 received 27/01/2020  
 Internal Layout - 3B5P-M2-T01 251797-A100-H7B-26-PL-ZZ-0382 P03 received 27/01/2020  
 Internal Layout - 3B5P-M3-T02 251797-A100-H7B-26-PL-ZZ-0383 P03 received 03/02/2020  
 Internal Layout - 3B5P-M2-T03 251797-A100-H7AE-26-PL-ZZ-0384 P01 received 05/04/2019  
 Internal Layout - 3B5P-M2-T04 251797-A100-H7AE-26-PL-ZZ-0385 P01 received 05/04/2019  
 Internal Layout - 3B5P-M3-T05 251797-A100-H7E-26-PL-ZZ-0386 P03 received 27/01/2020  
 Internal Layout - 3B5P-M2-T06 251797-A100-H7B-26-PL-ZZ-0387 P02 received 27/01/2020

### **Time limit for implementing this permission and the approved plans**

1. The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:

(see list above)

Reason:

For the avoidance of doubt and in the interests of proper planning.

### **Permission is subject to the following pre-commencements conditions**

2. Ground floor layout

Before any works hereby authorised begins above grade on the superstructure (excluding cores), detailed plans at an appropriate scale of the Plot H7 ground floor shall be submitted to and approved in writing by the Local Planning Authority. Submitted details shall include the layout of all commercial units and associated service corridors. The development shall be carried out in accordance with the approved details.

Reason:

In order to allow flexibility for the scheme to maximise the provision of active retail frontages and to have confirmation of the size of the retail units in accordance with Strategic Policy 3: Shopping, Leisure and Entertainment, and Strategic Policy 12 Design and Conservation of

the Core Strategy 2011 and the NPPF.

### 3. Materials

a) Prior to the commencement of any works to the superstructure (excluding cores) of the approved tower building (H7 block D), the following details shall be submitted to and approved by the Local Planning Authority:

- 5m x 3.8m sample of the reinforced concrete (or similar) panels, textured reinforced concrete (or similar) panel for the base, reinforced concrete (or similar) panels with a fluted profile and masonry band for the tower.
- samples of all facing materials, including the facade materials, masonry, balconies, windows, doors, canopies for the tower building (H7 block D):

b) Prior to the commencement of any works to the superstructure (excluding cores) of the approved mansion blocks (H7 blocks A/E and B/C), the following details shall be submitted to and approved by the Local Planning Authority, (or in the case of the sample panel presented on site or at another location to be agreed by the Local Planning Authority):

- 2m x 2m sample panel for each mansion block incorporating the brickwork (to show the bond, mortar and including the interface where there is a change in brick colour between facades), corduroy brickwork, glazed tiles, scalloped masonry band and masonry band;
- samples of all facing materials, including balconies, windows, doors, masonry base, scalloped masonry band, louvres, servicing yard shutter and masonry band, glazed tiles and canopies for both mansion blocks (H7 blocks A/E and B/C);

c) The development shall not be carried out otherwise than in accordance with any such approval given pursuant to parts a) and b).

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with saved policies 3.12 Quality in Design and 3.13 Urban Design of the Southwark Plan (2007) and SP12 Design & Conservation of the Core Strategy (2011).

### 4. Detailed drawings

a) Prior to the commencement of any works to the superstructure (excluding cores) of the approved tower building (H7 block D), the following details shall be submitted to and approved by the Local Planning Authority:

- 1:20 scale contextual sections;
- 1:5 & 1:10 scale details of the heads, cills and jambs of openings and balconies, parapet, and crown features; and
- 1:10 scale details of the balcony design of the tower.

b) Prior to the commencement of any works to the superstructure (excluding cores) of the approved mansion blocks (H7 blocks A/E and blocks B/C) and the ground floor podium building across the site, the following details shall be submitted to and approved by the Local Planning Authority:

- 1:20 scale contextual sections;
- 1:5 & 1:10 scale details of the heads, cills and jambs of openings and balconies, parapets, shopfronts, servicing yard entrance, cycle store entrances, plant substation facade, and residential entrances; and

c) The development shall not be carried out otherwise than in accordance with any such approval given pursuant to parts a) and b).

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details (and in the case of the balcony details, a suitable wind environment for future residents) in accordance with saved policies 3.12 Quality in Design and 3.13 Urban Design of the Southwark Plan (2007) and SP12 Design & Conservation of the Core Strategy (2011).

#### 5. Play space details

Before any works hereby authorised begins above grade on the superstructure (excluding cores), detailed plans at an appropriate scale of the Plot H7 details of the play space to be provided in the podium courtyard shall be submitted to and approved in writing by the Local Planning Authority. Submitted details shall include the layout (area), play structures and equipment and seating to be installed, and how it is appropriate for the 0-5 year old age group. The development shall be carried out in accordance with the approved details prior to first occupation of the development.

Reason:

In order to ensure sufficient play space, equipment and features are incorporated into the podium garden for future residents, in accordance with policy 3.6 of the London Plan, Strategic Policy 11 Open spaces and wildlife of the Core Strategy 2011 and the NPPF.

#### **Permission is subject to the following pre-occupation conditions**

#### 6. Accessible and wheelchair dwellings

Before the first occupation of the building, the applicant shall submit written confirmation from the appointed building control body that the specifications for each dwelling identified in the detailed construction plans meet the standard of the Approved Document M of the Building Regulations (2015) required in the schedule below and as corresponding to the approved floor plans. The development shall be carried out in accordance with the details thereby approved by the appointed building control body

Access to and use of building standards M4(3a):

Units H7-B-06-01; H7-B-07-01; H7-B-08-01; H7-C-01-05; H7-C-02-04; H7-C-02-05; H7-C-03-04; H7-C-03-05; H7-C-04-04; H7-C-04-05; H7-C-05-04; H7-C-05-05; H7-C-06-04; H7-C-06-05; H7-C-07-04; H7-C-07-05; H7-C-08-04; H7-C-08-05; H7-E-01-04; H7-E-02-04; H7-E-03-04; H7-E-04-04; H7-E-05-04; H7-E-06-04; H7-E-07-04; H7-E-08-04.

Access to and use of building standards M4(3b):

Units H7-B-01-01; H7-B-02-01; H7-B-03-01; H7-B-04-01; H7-B-05-01.

All other units shall meet M4(2) (accessible and adaptable dwellings).

Reason:

To ensure the development complies with Core Strategy 2011 Strategic Policy 5 (Providing new homes) and London Plan 2016 Policy 3.8 (Housing choice).

#### **Permission is subject to the following compliance condition(s)**

#### 7. Landscaping and planting

The landscaping and planting shown on the drawings hereby approved shall be carried out in accordance with the approved details and in the first appropriate planting season following the completion of the building works.

Reason:



To ensure that the details of the scheme are in accordance with Strategic Policy 11 Open spaces and wildlife and Strategic Policy 12 Design and conservation of The Core Strategy 2011 and Saved Policies 3.12 Quality in Design, 3.13 Urban design and 3.28 Biodiversity of the Southwark Plan 2007.

### **Informatives**

- 1 Thames Water note the provision of the S106 right to connect, but would like to draw the applicant attention to the 3rd paragraph of the letter where it outlines that this is not confirmation that capacity exists within the waste network. For this reason, Thames Water will require the points of connection to the public sewer system for both foul and surface water, as well as the anticipated flow (including flow calculation method) into any proposed connection point, to be clearly stipulated within a drainage strategy for the proposed development. This data can then be used to determine the impact of the proposed development on the existing sewer system. In addition, please indicate what is the overall reduction in surface water flows. i.e. existing surface water discharges pre development in to the public sewers for storm periods 1 in 10, 30, 100 etc versus the new proposed volumes to be discharged for the whole development. If the drainage strategy is not acceptable Thames Water will request that an impact study be undertaken.
- 2 The EA is pleased with the proposed registration with the Environment Agency's 'Flood Line' service within the submitted Flood Risk Assessment. This can be done by calling 0345 988 1188 to register.

The EA strongly recommend the use of flood proofing and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage. This should be considered because the plans indicate multiple plant rooms on the ground floor which could be flooded during a breach event. To find out which measures will be effective for this development, please contact the building control department. In the meantime, if you'd like to find out more about reducing flood damage, visit the flood risk and coastal change pages of the planning practice guidance. The following documents may also be useful:

Department for Communities and Local Government: Preparing for floods and Department for Communities and Local Government: Improving the flood performance of new buildings.

**Engagement Summary Template for the Development Consultation Charter**

Before your application goes live and is validated the template needs to be completed and submitted.

**Site:** Plot H7 Elephant Park

**Address:** Plot H7, Heygate Street within land bounded by Elephant Park to the north, Plot H2 to the west, Heygate Street to the south and H11B to the east, London, SE17

**Application reference:** 19/AP/1166

**List of meetings:**

<b>Meetings</b>	<b>Date</b>	<b>Attendees</b>	<b>Summary of discussions</b>
Pre-application Meeting #1	19 <sup>th</sup> June 2018	Council officers	Initial meeting
Design Workshop #1	19 <sup>th</sup> July 2018	Council officers	Design and Massing
Pre-application Meeting #2	9 <sup>th</sup> August 2018	Council officers	Highways
Design Workshop # 2	19 <sup>th</sup> September 2018	Council officers	Massing and Daylighting
Design Workshop #3	11 <sup>th</sup> October 2018	Council officers	Façade design
Pre-application Meeting # 4	30 <sup>th</sup> October 2018	Council officers	Design and Façade
Walworth Society (stall at meeting)	1 <sup>st</sup> November 2018	Approx. 30	High level overview of plot location, approved parameters and design aspirations. No comments received.
Design Review Panel	13 <sup>th</sup> November 2018	Southwark Design Review Panel Members, Council officers	Presented the design proposals
Walk & talk with the Walworth Society	15 <sup>th</sup> November 2018	8 members of the Walworth Society and 5 team members	Topics discussed included the architectural history of Walworth, local character, the emerging new context, materiality, historic buildings and the relationship of nearby estates.
Southwark Cyclists	Offered a meeting but not undertaken as the application has minimal impact on cycling. Agreed to keep informed.		
Elephant Park residents	2 <sup>nd</sup> December 2018	Approx. 20	Topics discussed included the proposed height, approved parameters, timescales, look & feel, ground floor uses and residential drop-off bays
Pre-application Meeting # 5	3 <sup>rd</sup> December 2018	Post DRP Design Review	Design review following the comments from DRP
Pre-application Meeting # 6	4 <sup>th</sup> December 2018	Council officers	Highways
Ward Councillors Meeting	9 <sup>th</sup> January 2019	Cllr Lury and Cllr Merrill	Topics discussed included general progress update on the development, emerging design proposals for H7, approved OPP parameters, materiality and emerging new context.
Southwark Living Streets	10 <sup>th</sup> January 2019	Approx. 10	Topics discussed included general progress update on the development, Sayer Street opening, amount and type of

			affordable housing, local architectural references, car parking and the emerging retail offer.
Cabinet Member for Growth Development and Planning	28 <sup>th</sup> January 2019	Clr Situ	Topics discussed included general progress update on the development, emerging design proposals for H7, approved OPP parameters, materiality and emerging new context.
Pre-application Meeting # 8	8 <sup>th</sup> February 2019	Council officers	Tower, entrances, layouts, residential amenity
Borough, Bankside and Walworth Community Council	9 <sup>th</sup> February 2019	Approx. 35	Sign posting for public consultation events
Ward Councillors Meeting	27 <sup>th</sup> February 2019	Clr Lury and Clr Merrill	Presented final design proposals
Cabinet Member for Growth Development and Planning	28 <sup>th</sup> February 2019	Clr Situ	Presented final design proposals
Walworth Society (selection of public consultation exhibition boards)	9 <sup>th</sup> May 2019	Approx. 20	Topics discussed included sound insulation, community uses, employment opportunities, daylighting, affordable housing, car parking, managing refuse, etc.

**List of public consultation events carried out to date or planned:**

Public consultation events	Date	Attendees	Summary of feedback
Public consultation	22 <sup>nd</sup> November 2018	69 people over the two days completing 12 feedback forms	Key topics across the consultation included maintaining the quality benchmark of earlier phases, maximising trees & planting and use of roof gardens, referencing local history and character, deliveries & rubbish collection, sustainable retail, cycle stores, materials & CGIs, and active frontages.
Public consultation	24 <sup>th</sup> November 2018		
Public consultation	14 <sup>th</sup> February 2019	76 people over the two days completing 17 feedback forms	
Public consultation	16 <sup>th</sup> February 2019		
Public consultation	25 <sup>th</sup> April 2019	74 people over the two days completing feedback forms	Key topics included look & feel, public realm and landscaping, new trees, active ground floor uses, retail strategy, cycles, plot servicing, and residential drop-off bays.
Public consultation	27 <sup>th</sup> April 2019		

**Demographic context:**

- The site is currently unoccupied
- Immediate residents include those living in South Gardens and Highwood Gardens West Grove
- Other nearby residents include those living in Wansey Street, Trafalgar Place, Balfour Street, Rodney Road, Rodney Place and Munton Road
- Key community stakeholder groups include Walworth Society, Southwark Living Streets, and Southwark Cyclists
- Consultation events were held at Balfour Street Housing Project and Hej Roastery, Rodney Road
- All events were fully inclusive and attracted a diverse range of existing and Elephant Park residents, people from a range of different BAME backgrounds and ages – data on demographics was not collected as it was not a requirement when the events were held.

**Cultural setting:**

- Is the site in conservation area - No
- Is the building listed - No
- Is the site/building a place of community interest? - No

**Highways:**

- The site is accessed from Heygate Street

**Other engagement:**

Consultation events were advertised with:

- Over 11,000 A6 flyers delivered door-to-door to all addresses within the Elephant & Castle Opportunity Area (Core area);
- Quarter page newspaper adverts in Southwark News; and
- On the project website ([www.elephantpark.co.uk](http://www.elephantpark.co.uk))

In addition, Elephant Park residents were updated on the proposals in the spring e-newsletter, sent on 14<sup>th</sup> May 2019.

**Ways to feedback responses were:**

Feedback at consultation events was via a feedback form that was:

- Collected at the event;
- Via email; and
- Via freepost (envelopes were supplied).

**Other matters:**

The Statement of Community Involvement and Statement of Involvement Addendum provides a detailed record and statistics for:

- Support - public consultation summary (provide statistics)
- Objection - public consultation summary (provide statistics)
- Provide examples of all consultation materials

The Social Regeneration Charter, Place Action Plan and Community Investment Plan were not published before submission of this application.

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