

## Planning Committee

Tuesday 7 September 2021  
2.00 pm

### Membership

Councillor Martin Seaton (Chair)  
Councillor Kath Whittam (Vice-Chair)  
Councillor James Coldwell  
Councillor Richard Livingstone  
Councillor Cleo Soanes  
Councillor Dan Whitehead  
Councillor Damian O'Brien  
Councillor Bill Williams

### Reserves

Councillor Radha Burgess  
Councillor Victor Chamberlain  
Councillor Jon Hartley  
Councillor Nick Johnson  
Councillor Eleanor Kerlake  
Councillor James McAsh  
Councillor Victoria Mills  
Councillor Margy Newens

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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.

#### Babysitting/Carers allowances

If you are a resident of the borough and have paid someone to look after your children, an elderly dependant or a dependant with disabilities so that you could attend this meeting, you may claim an allowance from the council. Please collect a claim form at the meeting.

#### Access

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#### Contact

Gregory Weaver email: [greg.weaver@southwark.gov.uk](mailto:greg.weaver@southwark.gov.uk)

Members of the committee are summoned to attend this meeting

**Eleanor Kelly**

Chief Executive

Date: 30 August 2021



# Planning Committee

Tuesday 7 September 2021  
2.00 pm

## Order of Business

Item No.	Title	Page No.
	<b>PART A - OPEN BUSINESS</b>	
	<b>PROCEDURE NOTE</b>	
<b>1.</b>	<b>APOLOGIES</b>	
	To receive any apologies for absence.	
<b>2.</b>	<b>CONFIRMATION OF VOTING MEMBERS</b>	
	A representative of each political group will confirm the voting members of the committee.	
<b>3.</b>	<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.	
<b>4.</b>	<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.	
<b>5.</b>	<b>MINUTES</b>	3 - 6
	To approve as a correct record the Minutes of the open section of the meeting held on 4 August 2021	

<b>Item No.</b>	<b>Title</b>	<b>Page No.</b>
<b>6.</b>	<b>NEW SOUTHWARK PLAN</b>	<b>7 - 15</b>
<b>7.</b>	<b>DEVELOPMENT MANAGEMENT</b>	<b>16 - 19</b>
<b>7.1.</b>	<b>216-220 BLACKFRIARS ROAD 20/AP/3250</b>	<b>20 - 115</b>
<b>7.2.</b>	<b>FT BUILDING 21/AP/0599</b>	<b>116 - 283</b>
<b>7.3.</b>	<b>WICKWAY COMMUNITY CENTRE 21/AP/0239</b>	<b>284 - 326</b>

**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.”

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

**DISTRIBUTION OPEN 202122**

Date: 30 August 2021

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### 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 Planning Committee held on Wednesday 4 August 2021 at 6.30 pm  
at Ground Floor Meeting Room G01A - 160 Tooley Street, London SE1 2QH

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**PRESENT:** Councillor Martin Seaton (Chair)  
Councillor Kath Whittam  
Councillor James Coldwell  
Councillor Richard Livingstone  
Councillor Damian O'Brien  
Councillor Dan Whitehead  
Councillor Bill Williams

**OFFICER  
SUPPORT:** Colin Wilson, Head of Strategic Development  
Jon Gorst, Legal Services  
Gregory Weaver, Constitutional Team

### 1. APOLOGIES

Apologies were received from Councillor Cleo Soanes

### 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 before the meeting:

1 Addendum report.

#### 4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

There were no disclosures of interests.

#### 5. MINUTES

The minutes of the meeting held on 20 July 2021 was approved as a correct record of the meeting.

#### 6. 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 attached items were 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 be agreed.
3. That where reasons for decisions or conditions were not included or not as included in the reports relating to an individual item, they be clearly specified and agreed.

#### 7. 1 BANK END (SITE RAILWAY ARCHES AND THAMES HOUSE BOUNDED BY STONEY STREET, CLINK STREET AND PARK STREET) SE1

Planning application numbers:

21/AP/0507 for: Full Planning Application and Application

21/AP/0326 for: Variation of Legal Agreement

##### PROPOSAL

21/AP/0507 - Minor material amendments to planning permission 19/AP/1649 dated 2.10.2019 (which was a variation of permission 15/AP/3066) for "Redevelopment of 1 Bank End, including reuse of railway arches and rebuilding and extension of the rear of Thames House (behind retained facade); remodelling of Wine Wharf building and development of a two storey building at 16 Park Street, all to provide a development with a maximum height of 6 storeys (maximum building height 27.419m AOD) comprising retail units (flexible class A1 shops, A3 cafes/restaurants and A4 drinking

establishments use) at ground and first floor levels, a gallery (Class D1 use) at ground floor level, office floorspace (Class B1 use) at ground up to fifth floor level, a cinema (Class D2 use) at ground floor and basement level, associated cycle parking spaces, new access routes and public open space"

The amendments seek the following:

- amendment to Condition 28 to allow for an increased amount of floorspace to be occupied by restaurants and cafes (Class A3) or pubs, wine bars or drinking establishments (Class A4) from 30% to 45% of the total retail area, with no more than 10% of the total retail area to be used for pubs, wine bars or drinking establishments, and with no more than 1 unit on Stoney Street to be used as a pub, wine bar and drinking establishment;
- revised ground and first floorplan drawings showing amendments to unit layouts and sizes that have resulted from design development and construction.

21/AP/0326 - Variation of the section 106 agreement relating to planning permission refs 15/AP/3006 and 19/AP/1649. The proposal seeks to amend the definition of 'Small Enterprises' to read as: "means small and medium sized enterprises that operate 10 or fewer retail outlets within the UK at the date that heads of terms for a lease of an Independent Retail Unit are agreed between the intended parties to such lease, and for the avoidance of doubt a Small Enterprise shall not include any Supermarket owner and/or operator".

The Committee heard the officer's introduction to the report.

Members of the committee asked questions of officers present.

The Committee heard the objector's statement.

Members of the committee asked questions of the objectors present.

The applicant's representatives addressed the committee and answered questions by the committee.

The Ward Councillor, Councillor Adele Morris spoke on this item. The committee discussed the application.

The Chair noted the inclusion of an extra recommendation, which was submitted in the addendum.

A motion to grant the application was moved, seconded, put to **the**

vote and declared carried:

1.
  - a) For application 1 ref. 21/AP/0507 that an amended planning permission be granted subject to revised conditions, the completion of a deed of variation and the GLA confirming it does not wish to call the application in for its own determination; and
  - b) For application 2 ref. 21/AP/0326 that the variation of the legal agreement be agreed subject to the completion of a deed of variation.
2. In the event that the requirements of parts a) or b) above are not met by 31 December 2021, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 186.
3. That members note and consider the late observations, consultation responses and information received in respect of the item in reaching their decision.

**CHAIR:**

**DATED:**

<b>Item No.</b> 6.1	<b>Classification:</b> Open	<b>Date:</b> 7 September 2021	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>		New Southwark Plan: Main Modifications	
<b>Ward(s) or groups affected:</b>		All	
<b>From</b>		Director of Planning and Growth	
<b>Cabinet Member:</b>		Councillor Helen Dennis, Cabinet Member for the Climate Emergency and Sustainable Development	

## RECOMMENDATIONS

That Planning Committee:

1. Notes the New Southwark Plan Main Modifications (EIP219)<sup>1</sup> for public consultation between 6 August and 24 September 2021.
2. Notes the publication of the New Southwark Plan Additional Modifications (“minor modifications”) (EIP238).
3. Notes the updated Integrated Impact Assessment July 2021 (EIP224), updated Equalities Impact Assessment (EIP225) and supporting documents available on the Examination webpage.

## BACKGROUND INFORMATION

### *Background to the New Southwark Plan*

4. The New Southwark Plan (NSP) is a statutory planning document that will provide an overarching strategy for managing growth and development across the borough for the next 15 years. The plan will set out how we will deliver further regeneration and wider improvements to our borough in the years to come.
5. The New Southwark Plan explains our strategy for regeneration from 2019 to 2036. It will:
  - Set policies to support the provision of new homes including 11,000 new Council homes
  - Protect our existing schools, youth and community facilities in the borough and provide more where this is needed
  - Protect local businesses and attract more businesses into the borough to increase job opportunities
  - Support our high streets and increase the range of shops to increase their vitality
  - Direct growth to certain areas of the borough, predominantly in the Old Kent Road, Elephant and Castle, Canada Water, East Walworth, Blackfriars Road, Bankside and along the River Thames where there is greater public transport accessibility
  - Introduce policies to improve places by enhancing local distinctiveness and protecting our heritage assets

<sup>1</sup> EIP document numbers relate to Examination in Public documents available on the NSP Examination website

- Set policies to provide more green infrastructure, tackle the climate emergency and to promote opportunities for healthy activities.
6. The NSP is a spatial plan. Not only does it set out planning policies to guide development but it also explains how development will be delivered and may inform future decisions about investment in infrastructure. The New Southwark Plan will form part of Southwark's development plan along with the London Plan. It is a regeneration strategy for Southwark and will be used to make decisions on planning applications.
  7. While the New Southwark Plan must be in general conformity with the London Plan and the National Planning Policy Framework, it can adapt some of these policies to reflect specific issues in Southwark. It will replace the Core Strategy (2011), the saved Southwark Plan (2007), the Aylesbury Area Action Plan (2010), the Peckham and Nunhead Area Action Plan (2014) and the Canada Water Area Action Plan (2015).
  8. There have been several stages of consultation between 2013 and 2021. The first stage was the *issues* consultation from October 2013 to February 2014. This consultation was a community conversation on the 'Health of the High Streets'. The Options Version sets out a detailed strategy for regeneration in Southwark and the council's approach to planning to deliver the Fairer Future promises. Consultation took place from October 2014 to February 2015.
  9. Following the Options Version consultation the document was divided into two sections for the 'Preferred Option Version' consultation. *Part One: Strategic Policies and Development Management Policies* was consulted on from November 2015 to March 2016. *Part Two: Area Visions and Site Allocations* was consulted on from February to May 2017. From June 2017 the Council reconsulted on a selection of policies also at the 'Preferred Option' stage.
  10. The Proposed Submission version of the plan was prepared in light of the comments received through previous stages of consultation. It was consulted on between December 2017 and February 2018 (Regulation 19) and only related to the:
    - Legality of the Plan in regards to Section 20 (5) (a) of the Planning and Compulsory Act 2004; and
    - Soundness of the Plan as required by the National Planning Policy Framework.
  11. The Proposed Submission version was the version of the Plan the Council intended to adopt. The council received 334 detailed consultation responses on the Proposed Submission version. In response to the consultation, some policies were proposed to be amended with substantial amendments prior to the plan being submitted to the Secretary of State.
  12. Due to the changes proposed to these policies, a further round of consultation on the Proposed Submission version amended policies took place between March 2019 and May 2019. This consultation related to the legality and soundness of the Plan. We received 127 responses on these policies.
  13. The NSP was submitted to the Planning Inspectorate for Examination in January 2020. As part of the Examination in Public we carried out another consultation from August - October 2020, which allowed us to gain feedback on changes to the plan which were

recommended by the Inspectors (EIP27A and B, Council's Proposed Changes to the Submitted NSP, August 2020).

14. The public hearings took place virtually from 23 February – 11 March 2021 and 19 April – 30 April 2021. Following these hearings, The Inspectors wrote a post hearings letter on 28 May 2021 and under Section 20(7)(c) of the Planning and Compulsory Purchase Act (2004) the Council asked the Inspectors to recommend Main Modifications to ensure the Plan is sound. The Council is consulting on the Main Modifications for 7 weeks as recommended by the Inspectors from 6 August 2021 to 24 September 2021. The Inspectors will be taking into account all duly made representations on the Main Modifications to the New Southwark Plan. The Inspectors will write a report once the consultation has concluded and they have had the opportunity to consider representations. The plan will then be considered by Cabinet and Council Assembly for final adoption.
15. Paragraphs 1.3-1.6 of the Inspectorate's Procedure Guide to Local Plan Examinations provides a helpful definition for "main modifications" and "additional modifications" (commonly referred to as minor modifications).
16. "Main modifications" are material changes to the submitted Plan which are necessary to make it sound and legally compliant. Main modifications can only be recommended by Inspectors at the request of the Local Planning Authority. The council asked the Inspectors under section 20(7C) of the 2004 Planning and Compulsory Purchase Act as amended) to recommend 'main modifications' (changes that materially affect the policies) to make a submitted local plan sound and legally compliant on 21 May 2021 (EIP233). The Inspector's wrote a Post-Hearings Letter to the Council on 28 May 2021 (EIP236).
17. "Additional modifications" (minor modifications) are proposed non-consequential amendments to the Plan not necessary for soundness. These generally involve changes that enhance the clarity of the plan without materially affecting the implementation of plan policies and to provide factual updates. The examination does not concern itself with 'additional modifications' and these changes are a matter for the Council to make to its plan. It can be beneficial, however, if when consulting on proposed main modifications, the Council also publishes a schedule of its additional modifications for completeness. Additional Modifications will be published at the same time as the Main Modifications consultation.
18. Main Modifications incorporate changes to the New Southwark Plan since the Proposed Submission Version 2017 incorporating Amended Policies 2019. The council then made minor changes at Submission stage and at Council's Proposed Changes version August 2020 which was consulted on August to October 2020. The full list of Main Modifications and Additional Modifications is set out for this consultation.
19. Following adoption, the plan will be reviewed and updated on an ongoing basis to take into account any changing circumstances affecting Southwark or any changes in regional and national policy as required.



## KEY ISSUES FOR CONSIDERATION

20. The New Southwark Plan contains the following sections.

### Area Visions

21. Area Visions provide the strategic vision for the future of Southwark's distinct places. They set out key infrastructure enhancements, opportunities for public realm and transport improvements and growth opportunities. Area Visions also identify the character of different places to be renewed, retained or enhanced. Development proposals should be within the context of the relevant Area Vision and should demonstrate how they contribute towards the strategic vision for that area.

### Strategic Policies

22. Strategic policies are borough-wide policies which set out the council's strategy to work with local people to improve neighbourhoods and create new opportunities for the future. The New Southwark Plan contains six strategic policies to deliver the Borough Plan's values and priorities spatially ('Homes for all', 'Southwark Together', 'A great start in life', 'A green and inclusive economy', 'Thriving neighbourhoods and tackling health inequalities' and 'Climate Emergency').

### Development Management Policies

23. Development management policies are detailed planning policies which are used to assess planning applications.

### Site Allocations

24. Site Allocations are planning policies which apply to potential development sites of strategic importance. Site Allocations are needed to ensure that when strategic sites come forward for redevelopment they integrate into their surroundings and contribute towards meeting the local area's spatial needs. Site allocations are also needed to demonstrate the New Southwark Plan has been developed in conformity with the London Plan, which requires boroughs to identify strategic development sites which can meet housing targets and future infrastructure and land use needs.

25. Site Allocations set out land use requirements that must be provided as part of any redevelopment alongside other acceptable land uses. Site Allocations may specify development provides new public open space, public access routes or social infrastructure, such as health or education facilities. Site Allocations are not required for sites which are likely to be redeveloped acceptably under the development management policies of the New Southwark Plan.

### Submission and Examination documents

#### *Background Papers*

26. To support the submission of the Plan a number of background papers were prepared to justify our approach taken on the policies. These background papers comprise:

- Housing

- Student housing
- Affordable housing contributions on minor developments of one to nine units
- Industrial
- Office
- Retail
- Hotels
- Infrastructure
- Open space
- Tall buildings
- Viability

#### *Evidence base and supporting documents*

27. The National Planning Policy Framework (2021) (Paragraph 35), sets out the tests of soundness tests, including that the plan must be positively prepared, justified, effective and consistent with national policy. To be justified this requires an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. The supporting documents such as the Integrated Impact Assessment (Sustainability Appraisal) set out the reasonable alternatives considered. The plan is justified by a number of evidence base documents which have informed our policies.
28. Further evidence was submitted verbally by the Planning Policy team in the Hearing sessions for each of the Inspectors Matters, Issues and Questions throughout the Examination in Public. Additional evidence was also prepared where requested by the Inspectors. All documentation is available on the Examination webpage and has been used to inform the Main Modifications to the New Southwark Plan.

#### *Statements of Common Ground*

29. A number of Statements of Common Ground have been prepared with relevant stakeholders to agree strategic matters. These are also available on the Examination webpage.

#### **Community Impact Statement/Equalities Impact Statement**

30. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities (including the Council) to have, in the exercise of their functions, due regard to three “needs” which are central to the aims of the Act
- a) The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
  - b) The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
    - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are 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
- c) The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.
31. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
32. The purpose of the New Southwark Plan is to facilitate development growth in the borough and deliver the vision of the principles and values in the Borough Plan, ensuring that community impacts are taken into account. The New Southwark Plan is supported by an Equalities Impact Assessment (updated June 2021, EIP225) which was taken into account in the Examination in Public as part of the supporting documentation to the plan.

### **Financial Implications**

33. There are no immediate resource implications arising from this report.

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

#### **Director of Law and Governance**

34. As explained in the Background section to this report, the New Southwark Plan is a statutory planning document and the Council must therefore have regard to the statutory framework for local plans set out in the Planning and Compulsory Purchase Act 2004 ( 'the Act') and the Town and Country Planning (Local Planning) (England) Regulations 2012 made under the Act.
35. Following the conclusion of the public hearing sessions of the local plan examination, the Council is now following the post hearings advice set out by the Planning Inspectors in their letter of the 28 May 2021 which is itself based on the Planning Inspectorate's Procedure Guide for Local Plan Examinations. As the Guide makes clear, the Inspectors have agreed a timetable with the Council for the drafting of the proposed main modifications and the post hearings public consultation on those modifications which is required to ensure that there is compliance with the legal requirements.
36. It is important to note that the timetable towards adoption of the New Southwark Plan is not within the control of the Council. As the Procedure Guide makes clear at paragraph 6.10, the Inspector will consider all the representations made on the proposed main modifications before finalising the examination report and the schedule of recommended main modifications. It is within their power, in exceptional cases, to schedule further hearing sessions should they consider them essential to deal with substantial issues raised in the representations, or to ensure fairness.
37. Part 3F of the Council's Constitution sets out that it is the role and function of Planning Committee to '*comment on local development framework documents in respect of all*

*significant planning matters and make recommendations to the cabinet* and paragraph 12 states that matters reserved to planning committee include *'to comment on drafts of the local development framework during their consultation periods and make recommendations to the cabinet, as appropriate.'* In the present case, as noted in paragraph 14 of the report and in this supplementary advice, the Council is now following the post hearings advice of the Planning Inspectorate. Planning Committee members are therefore asked to note the consultation on the Main Modifications and publication of the Additional Modifications. Following publication of the Inspectors' report the New Southwark Plan will then be considered by Cabinet and Council Assembly for final adoption.

38. Part 3C of the Constitution states that matters reserved to full Cabinet include *'Approval for recommendation to council assembly of those proposals and plans contained in the council's budget and policy framework'*
39. Part 3A of the Constitution reserves the agreement of the policy framework, including development plan documents, to Council Assembly.

**Strategic Director of Finance and Governance (CE21/030)**

40. This report is requesting the Planning Committee to note the Southwark Plan Modifications as reflected in the recommendations.
41. The strategic director of finance and governance notes that there are no new immediate financial implications arising from this report.
42. Staffing and any other costs connected with this report to be contained within existing departmental revenue budgets
43. The strategic director of finance and governance expects that financial appraisals will be carried out as any new plans are developed and will be subject to future reports, including identifying the revenue or capital resources for any new commitments.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
New Southwark Plan Main Modifications and supporting documents	<a href="https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/new-southwark-plan?chapter=9">https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/new-southwark-plan?chapter=9</a>	planningpolicy@southwark.gov.uk
New Southwark Plan Examination Hearings	These can be viewed on the <a href="#">Council's YouTube page</a>	planningpolicy@southwark.gov.uk
New Southwark Plan Examination webpage including all relevant documentation	<a href="https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/new-southwark-plan">https://www.southwark.gov.uk/planning-and-building-control/planning-policy-and-transport-policy/new-southwark-plan</a>	planningpolicy@southwark.gov.uk
New Southwark Plan Council's Proposed Changes to the Submitted Version New Southwark Plan (August 2020)	<a href="https://www.southwark.gov.uk/assets/attach/34777/NSP-Print-Version-25.02.2021.pdf">https://www.southwark.gov.uk/assets/attach/34777/NSP-Print-Version-25.02.2021.pdf</a>	planningpolicy@southwark.gov.uk
National Planning Policy Framework	<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf</a>	planningpolicy@southwark.gov.uk

## AUDIT TRAIL

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth
<b>Report Author</b>	Juliet Seymour, Planning Policy Manager Laura Hills, Team Leader, Planning Policy, Monitoring and Digital Transformation
<b>Version</b>	Final

<b>Dated</b>	11 August 2021	
<b>Key Decision?</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
	<b>Comments Sought</b>	<b>Comments included</b>
Director of Law and Governance	Yes	Yes
Departmental Finance Manager	Yes	Yes
Cabinet Member	Yes	No
<b>Date final report</b>	11 August 2021	

<b>Item No.</b> 7	<b>Classification:</b> Open	<b>Date:</b>	<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	

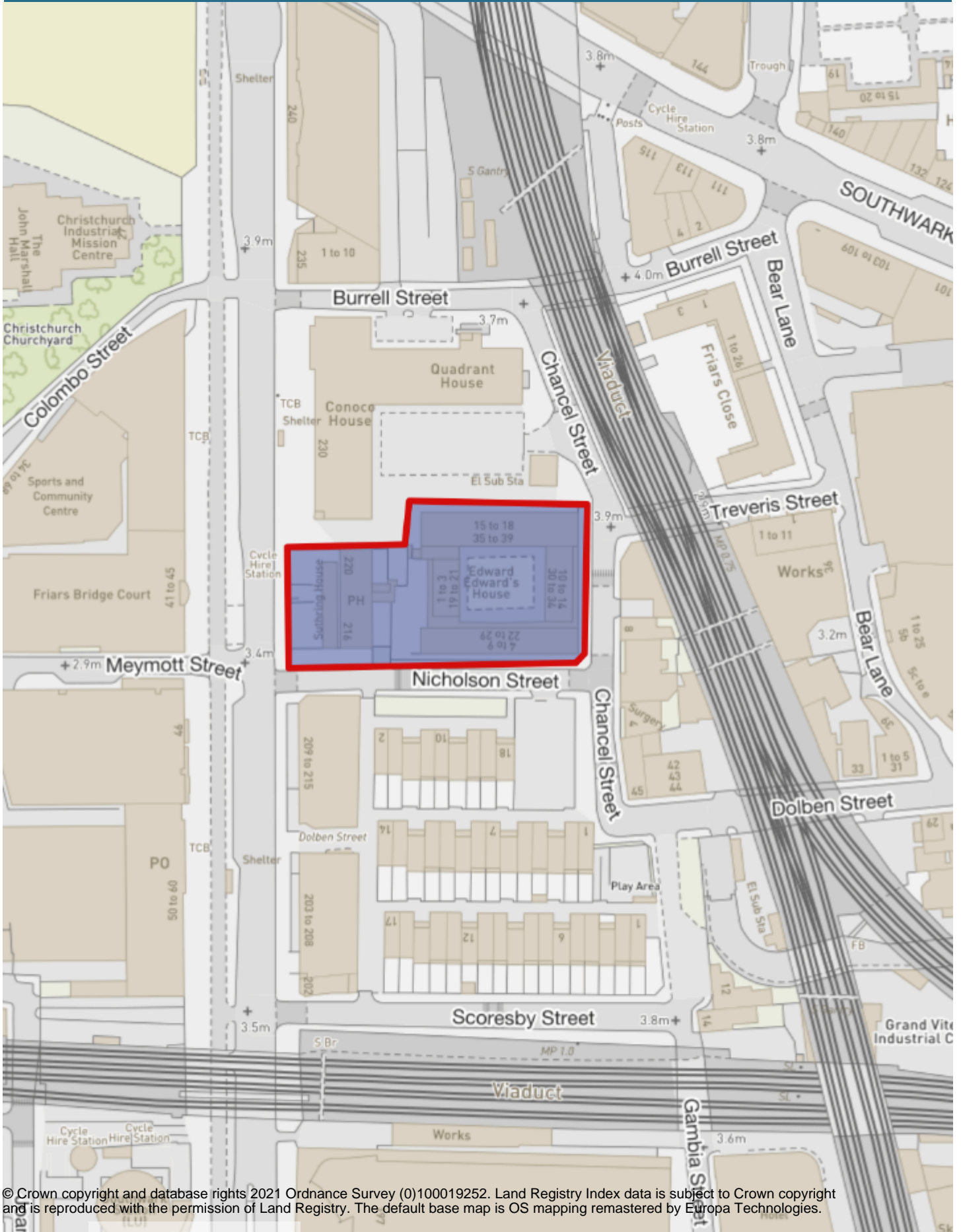
## AUDIT TRAIL

<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>	7 June 2019	
<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>		7 June 2019

# Agenda Item 7.1



Land, Including Edward Edwards House And The Prince William Pub, Suthring House, At 216-220 Blackfriars Road, SE1



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11-Aug-2021

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<b>Item No.</b>	<b>Classification:</b>	<b>Date:</b>	<b>Meeting Name:</b>
7.1	OPEN	07.09.2021	Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b>		
	<p>Redevelopment of the site comprising demolition of the existing buildings and erection of a new part 22/part 15 storey building (with three levels of basement) comprising Office (Class E), Public House (Sui Generis), 66 flats (Class C3) and flexible Office/Community use (Class E/F2) together with public realm improvements and other associated works.</p> <p><b>Address:</b> Land, Including Edward Edwards House And The Prince William Pub, Suthring House, At 216-220 Blackfriars Road (north Of Nicholson Street), SE1</p>		
<b>Ward(s) or groups affected:</b>	Borough and Bankside		
<b>From:</b>	Director of Planning and Growth		
<b>Application Start Date</b>	11.12.2020	<b>PPA Expiry Date</b>	28.01.2022
<b>Earliest Decision Date</b>	14.02.2021		

### RECOMMENDATION

1. That planning permission be granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.
2. In the event that the requirements of paragraph 1 above are not met by 28 January 2022, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 364.

### EXECUTIVE SUMMARY

3. This application seeks to redevelop existing buildings on land fronting Blackfriars Road, Nicholson Street and Chancel Street to provide offices, a public house and 62 almshouse dwellings. The building would range from 15 to 22 storeys in height. The applicant is Southwark Charities, who own and operate the existing Edward Edwards House almshouses, and also own the adjacent land to the immediate north, although this does not form part of the current application.

4. This northern part of Blackfriars Road is undergoing rapid change, with new buildings of significant height and increased densities, responding to the location within a highly accessible part of the Central Activities Zone. There is increased interest in building office and commercial schemes in this area, which is consistent with development plan policies reflecting the important role of the CAZ in London's economy.
5. The application would see the pub, the Prince William Henry, replaced with a new public house use with outdoor seating, a large scale office capable of providing around 2,270 jobs, 62 new almshouse flats (plus a caretakers flat and three small visitor units). The almshouses would all be defined as affordable housing and specifically designed for older people. They provide good quality accommodation, and benefit from communal and social spaces and landscaped terraces. This part of the wider development also provides a community space and affordable offices earmarked for charities.
6. The site forms part of a wider site allocation, NSP13, in the emerging New Southwark Plan. Whilst this application only covers the southern part of the wider allocation site, the uses proposed are consistent with the allocation, increasing the quantity of offices, providing an active frontage to Blackfriars Road, re-providing the almshouses, and providing new public realm and routes. It does not provide general needs housing (Class C3 use) (which is identified as a 'should' in the allocation), but given the uplift in almshouse units, and the potential for more homes if the northern area of the allocation came forward, this is acceptable.
7. The building is tall, standing 22 storeys high as it fronts Blackfriars Road and returns into Nicholson Street, and 15 storeys at the rear, fronting Chancel Street. Although on the periphery of the cluster of very tall buildings at the northern end of Blackfriars Road, it is noticeably taller than its immediate neighbours, and will be a prominent feature in views from the lower rise areas to the east. The building has been carefully designed, using high quality materials, and on balance it is concluded that the scale can be justified when taking due account of the high quality design, and contribution to public realm.
8. A new public and communal garden space is provided at the eastern end of the site, fronting Chancel Street. This would act as a welcome break in the street scene, and a suitable setting for the tall building. Additional public realm improvements are included to the route along the northern edge of the site, and on Blackfriars Road.
9. The report sets out the 'less than substantial' harm to nearby heritage assets, and balances this with the public benefits of the scheme. It also sets out the impact on amenity for neighbours, particularly those on the Rochester Estate to the south, which arises from the scale of the building, and concludes that whilst the harm is substantial in some cases, it is consistent with the need to apply the BRE tests flexibly in dense urban environments.
10. The building performs well in terms of its carbon impact, with 50% savings in carbon emissions achieved against Part L of the Building Regulations 2013. This is through building fabric efficiencies and reducing energy demand in line with London Plan 2021 policies, in addition to renewable energy generation through

PV panels and air source heat pumps. The remaining 50% balance to zero carbon would be met by an off-set payment of approximately £638,400 to be secured by S106 obligation. The non-residential elements of the proposal would achieve BREEAM 'Excellent,' in compliance with policy.

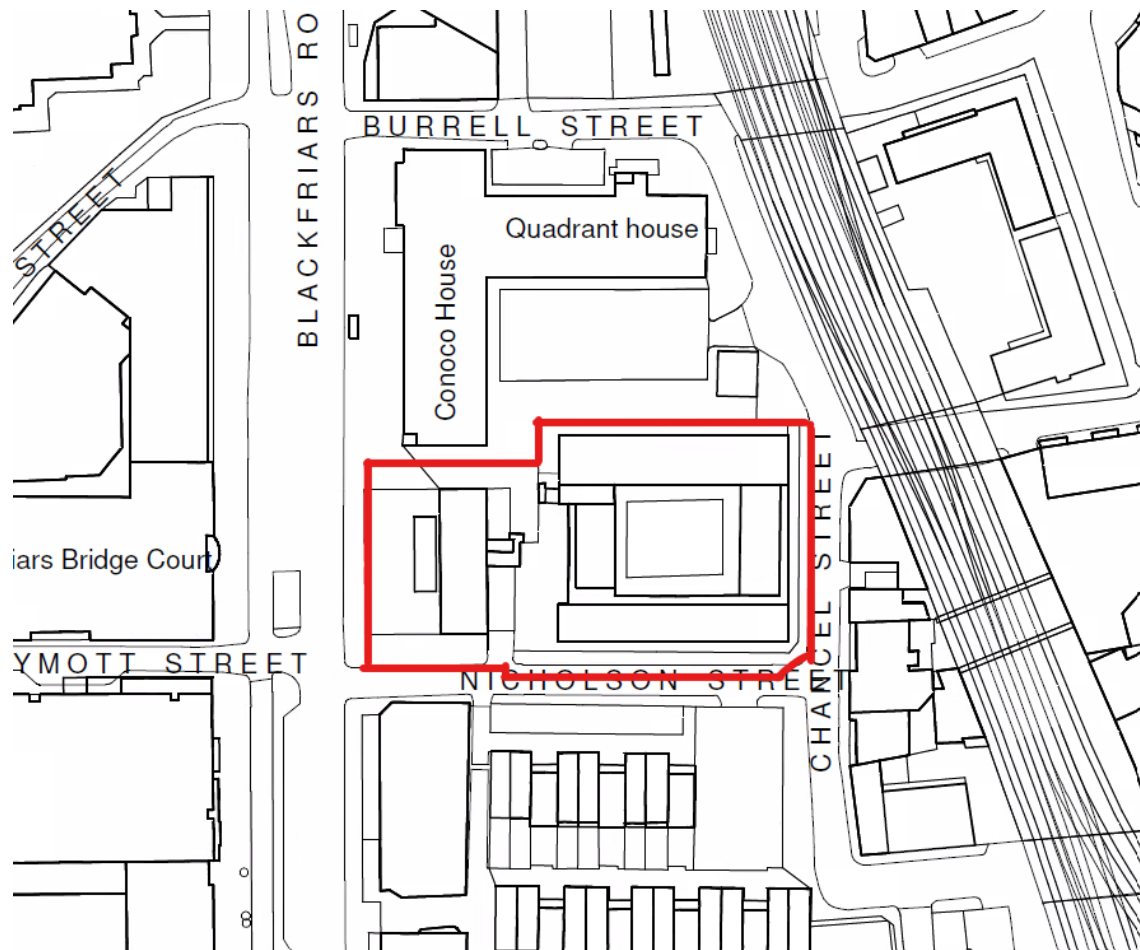
11. The transport impacts are not significant given the site's 'Excellent' PTAL rating, and servicing for all but larger vehicles would be contained within the site. Contributions would be secured through the s106 agreement for contributions to TfL's Santander cycle hire and Healthy Streets schemes, in addition to targets set and financial contributions secured against these for delivery and servicing arrangements and a travel plan to minimise trips and encourage active travel.
12. In response to the Council's statutory consultation, 3 objections and 69 comments in support were received from members of the public. The objections were from residents very close to the site, raising strong objections to the scale and resultant impact on amenity. The comments in support were from a much wider geographical area, generally noting the contribution to affordable housing for older people, and supporting the work of Southwark Charities, and most came from charities and organisations with interest in these issues. The GLA's Stage 1 report supported the application, including strong support for the provision of the affordable housing element for older people, subject to clarification and resolving issues regarding the impacts of the proposal as a tall on microclimate, energy and sustainability, and transport. This issues were subsequently resolved during the application determination period.
13. The application would create good quality affordable homes, modern offices, and an active and dynamic frontage to Blackfriars Road, within a building with a distinctive and attractive architecture. The scheme is compliant with adopted and emerging development plan policy, when read as a whole, and as such the report recommends that planning permission be granted.

## **BACKGROUND INFORMATION**

### **Site location and description**

14. The site comprises an approximately 0.34ha parcel of land located between Blackfriars Road to the west, neighbouring residential and commercial buildings and an associated car park to the north, Chancel Street to the east and Nicholson Street to the south.
15. The site currently contains two low-rise post-war buildings: Suthring House is a mixed use building with the Prince William Henry public house on the ground floor. It has a large area of external seating fronting Blackfriars Road. Six self-contained residential units are located in the upper two storeys of the building. The remainder of the site is largely taken up by the two storey Edward Edwards House. This is a perimeter block with an internal courtyard garden. The building hosts 25 almshouse flats, owned and managed by Southwark Charities.



Existing Site Plan

16. The buildings to the north of the site comprise Conoco House and Quadrant House. The former faces Blackfriars Road as a commercial building, the latter being located to the rear of this and comprising social rented housing owned by L&Q. Between the application site and these buildings is an hard landscaped public route that connects Blackfriars Road with Chancel Street onto Treveris Street to the east through a railway viaduct. Both are 9 storey buildings. To the east bounding Chancel St is the railway viaduct, along with some smaller-scale 4 storey Victorian and Georgian buildings to the south east. To the south is a low-rise council estate comprising rows of 2-3 storey houses and flats, with properties on Nicholson Street facing the application site.
17. The application site is under the same freehold ownership as the two buildings (Conoco House and Quadrant House) and car parking area to the north. Together these comprise a site allocation in the draft New Southwark Plan, NSP13.
18. The buildings on the site are not listed, nor is it located in a conservation area. No.s 43 and 44 Dolben Street are located to the south east in the immediate vicinity of the site and, adjacent to the Victorian buildings located on Chancel Street. These buildings are Grade II listed. The site is located in the setting of the Roupell Street and Waterloo Conservation Areas, located in LB Lambeth to the west.

19. The site is additionally within the vicinity of the Grade II listed Christchurch located approximately 85m to the north east on the opposite side of Blackfriars Road. The surrounding churchyard gardens are designated and protected as Borough Open Land (BOL). 1 – 3 Stamford Street, also Grade II listed, are located further to the north also within the setting of the site.
20. Blackfriars Road hosts a range of local transport infrastructure, including numerous bus stops, the nearest London Underground station at Southwark Station approximately 150m to the south, and dedicated segregated cycle routes as part of Cycle Superhighway 6. Nicholson Street hosts a portion of one of London's cycle 'Quietways.'

Existing building – Suthring House



Existing building – Edward Edwards House

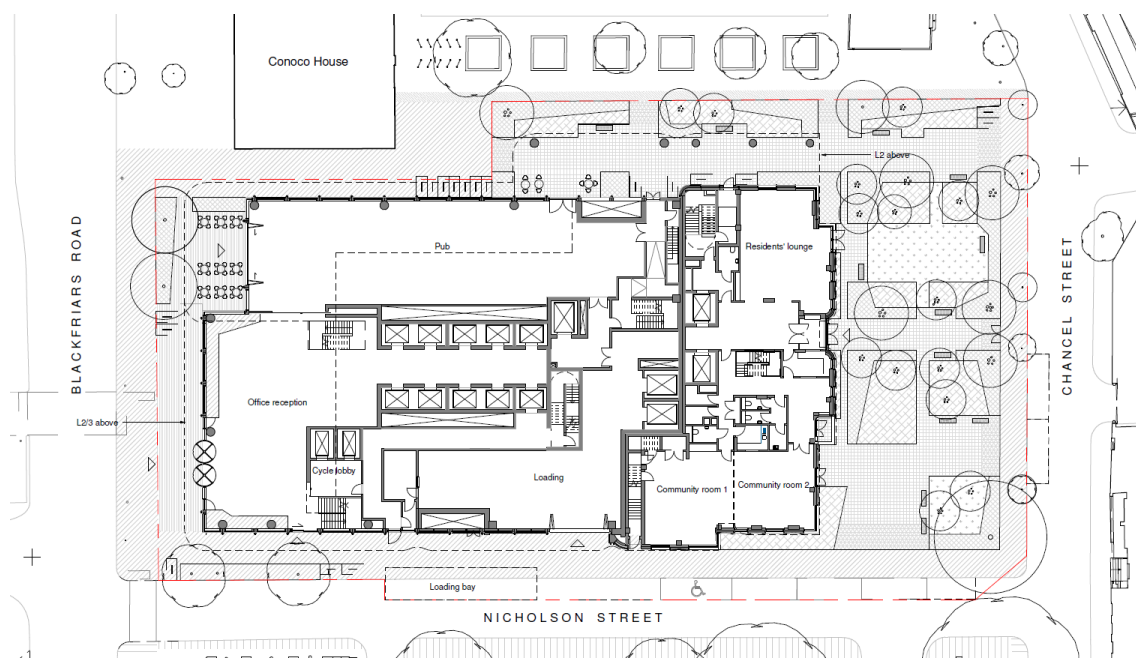


## Details of proposal

21. Planning consent is sought for the redevelopment of the site to include demolition of the existing buildings and the erection of a part 22 and part 15 storey mixed use building with associated public realm. The single building would comprise two volumes: the largest and tallest primarily providing E class office floorspace, with a public house (formerly Class A4, now Sui Generis use) on the ground floor and within a mezzanine level.
22. The massing of the office block element would accommodate set backs and step downs in height across levels 16, 18 and 20. These step backs would accommodate accessible external roof terraces to provide amenity space for the office occupants.

Both the office and public house elements would have their primary access fronting onto Blackfriars Road, with the public house located in the northern-most corner of the site. Servicing access for both of these uses would be provided from Nicholson Street to the south. An on-site loading bay would be provided for smaller vehicles within the proposed building, while larger delivery vehicles would utilise a bay on Nicholson Street for loading and unloading. Basement level cycle parking and associated facilities (showers, changing rooms, lockers) would be provided for the office, also accessed from Nicholson Street.

### Proposed Ground floor site plan



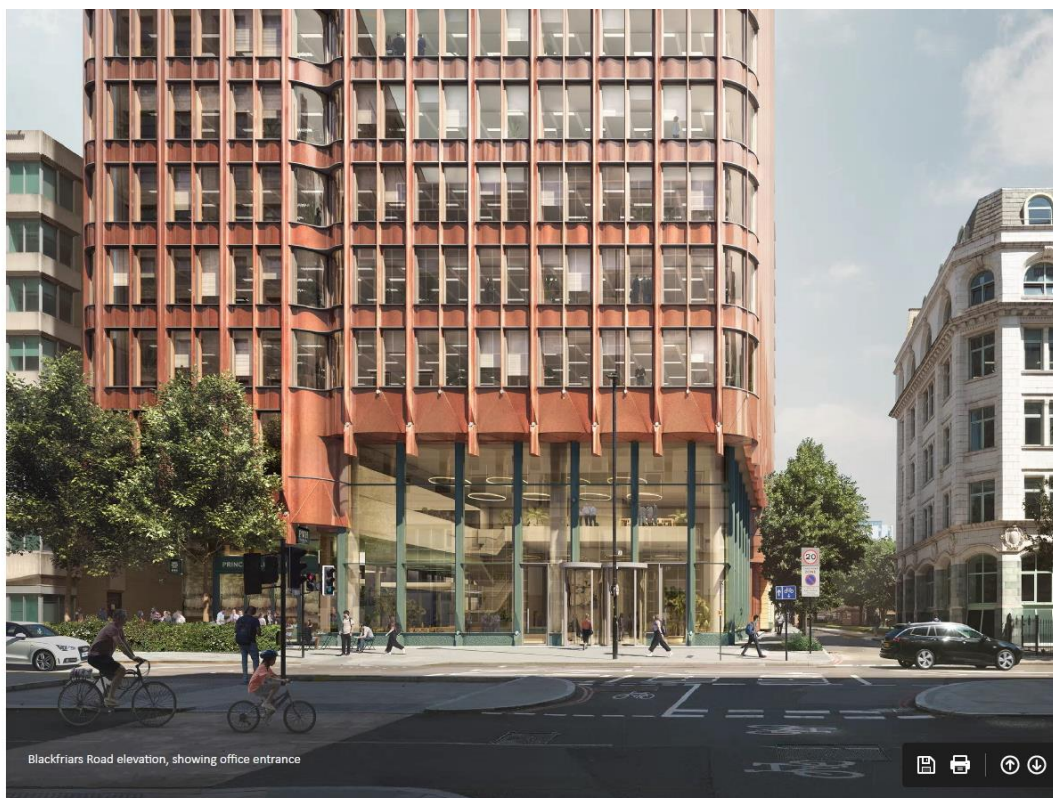
23. The public house would have areas of external seating both on the Blackfriars Road and off the retained east-west public route (to be called 'Edward's Walk') running between the site and Conoco House to the north. The public house frontage would double height, while the office frontage would be triple height with a large atrium, including mezzanine levels, behind.
24. The second volume of the proposed building comprises a 15 storey block fronting onto Chancel Street, to provide a community use and affordable workspace on



ground floor level and first floor levels, with 66 units of residential accommodation above. 62 one-bed flats would be to provide affordable housing (almshouses) for elderly occupants, to be managed by Southwark Charities. 3 of the units would provide guest suites for visitors, while the final unit would be a flat for an on-site care taker.

25. The almshouses accommodation block would be set back from the Chancel Street frontage to accommodate a new public space. This would be landscaped with a view to being accessible by both the public and as a communal garden for the almshouse residents. The residents would additionally have their own roof top amenity space at the top of the 15 storey the block.
26. The building would be faced primarily in terracotta tiles and glazing utilised in a variety of colours and arrangements to provide a distinctive pattern and character. The two primary elements of the development (the offices and the almshouses) would be distinguished by the change in elevation detail and colour: in the image below the larger Blackfriars Road office element has a red/orange colour scheme, while the residential almshouses block would be yellow.

### Proposed Blackfriars Road offices



## Planning History

### Planning history of the site

27. The site was subject to a pre-application enquiry under references 19/EQ/0193. The main issues discussed related to layout, height, scale massing, land use and impact on views and heritage assets.

Planning history of adjoining or nearby sites.

28. A number of developments within the vicinity of the application site along Blackfriars Road have been granted planning permission in recent years:
29. Application reference no.: **09/AP/1749**  
 Application type: Full planning permission  
 For: Demolition of existing building and erection of a new 14 storey building (maximum 47.93m AOD) incorporating two hotels with a total of 477 bedrooms (Class C1 - total floorspace 16414sqm GIA) each with restaurant (Class A3 - total floorspace 142sqm GIA) and bar (Class A4 - total floorspace 92sqm GIA), landscaping, plant and machinery and ancillary works, including works to Blackfriars Road and Meymott Street.  
 Address: 46-49 Blackfriars Road London SE1 8NZ  
**Decision: Granted with legal agreement**  
 Decision Issued Date: 09/11/2009
30. Application reference no.: **10/AP/3372**  
 Application type: Full planning permission  
 For: Erection of a 20 storey building with basement (maximum 89m AOD) to provide 29,198sqm of office floorspace and 455sqm of ground floor retail floorspace (Class A1/A2/A3/A4), with plant, rear servicing area and cycle parking.  
 231-241 Blackfriars Road London SE1 8NW  
**Decision: Granted with legal agreement**  
 Decision Issued Date: 15/06/2011
31. Application reference no.: **15/AP/0237**  
 Application type: Full planning permission  
 For: Redevelopment of land and buildings to provide a part 7, part 12, part 14 storey building plus basement, ground and mezzanine levels, comprising office (Class B1) and hotel (Class C1) with ancillary cafe/bar/restaurant and other associated supporting facilities, ancillary plant, servicing, and cycle parking and associated highway and public realm improvements.  
 Wedge House 32-40 Blackfriars Road London SE1 8PB  
**Decision: Granted with legal agreement**  
 Decision Issued Date: 26/08/2015
32. Application reference no.: **16/AP/1660**  
 Application type: Full planning permission  
 For: Demolition of existing office building (Class B1a) and redevelopment to provide a part 13, part 22 storey building plus basement comprising offices (Class B1a) with retail (Classes A1/A3 and A4) together with servicing, car parking and landscaping.  
 41-45 Friars Bridge Court Blackfriars Road London Southwark SE1 8NZ  
**Decision: Granted with legal agreement**  
 Decision Issued Date: 11/11/2016 (note: planning permission has lapsed)
33. Application reference no.: **16/AP/5239**  
 Application type: Full planning permission  
 For: Redevelopment of site to create four levels of basement and the erection of six buildings ranging from five to 53 storeys plus plant (heights ranging from

23.1m AOD - 183.5m AOD) to provide; office space (Class B1); 548 room hotel (Class C1); 288 residential units (Class C3); flexible retail uses (Classes A1/A2/A3/A4); restaurant (Class A3); music venue (Class D2); storage (Class B8); new landscaping and public realm; reconfigured vehicular and pedestrian access; associated works to public highway; ancillary servicing and plant; car parking and associated works.

Land At 18 Blackfriars Road Bounded By Stamford Street Paris Garden And Christ Church Gardens London SE1 8NY

**Decision: Granted with legal agreement**

Decision Issued Date: 21/06/2018

34. Application reference no.: **20/AP/1189**  
 Application type: Full planning permission  
 Redevelopment of the site including the demolition of Nos. 49-56 Hatfields and No 1 Joan Street to provide an 17 storey (plus plant) building above Southwark Underground Station accommodating Class B1 office space and Class A1/A2/A3/A4 retail space. The development includes associated basement construction, public realm improvements and associated highways works including the closure of Joan Street.  
 Southwark Underground Station The Cut, 68-70 Blackfriars Road London Southwark  
**Status: Resolution to grant planning permission agreed 17/03/2021, subject to completion of S106 agreement**
35. Application reference no.: **21/AP/0737**  
 Application type: Full planning permission  
 Demolition of existing buildings to allow for the erection of a new building up to eight storeys in height (plus roof plant and basement) to provide Class E accommodation including office and retail floorspace. The development will include improvements to the low line and public realm, cycle parking, provision of a service bay and other associated works.  
 33-36 Bear Lane London Southwark SE1 0UH  
**Status: Under consideration/assessment**

## KEY ISSUES FOR CONSIDERATION

### Summary of main issues

36. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use;
  - Housing issues, including affordable housing, housing mix and quality of residential accommodation
  - Design issues, including layout, building heights, architectural treatment and landscaping
  - Heritage considerations
  - Impact of proposed development on amenity of adjoining occupiers and surrounding area, including privacy, daylight and sunlight
  - Transport and highways, including servicing, car parking and cycle parking
  - Archaeology

- Environmental matters, including construction management, flooding, air quality and microclimate
- Energy and sustainability, including carbon emission reduction
- Planning obligations (S.106 undertaking or agreement)
- Mayoral and borough community infrastructure levy (CIL)
- Consultation responses and community engagement
- Community impact, equalities assessment and human rights

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

### **Legal context**

38. 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. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.
39. 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**

40. The statutory development plans for the Borough comprise the London Plan 2021, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007). The National Planning Policy Framework (2021) and emerging policies constitute material considerations but are not part of the statutory development plan. A list of policies which are relevant to this application is provided below. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.
41. The site is located within:
- The Central Activities Zone (CAZ)
  - The Bankside, Borough and London Bridge Opportunity Area (referred to in the London Plan 2021 as the London Bridge and Bankside Opportunity Area)
  - The Bankside and Borough District Town Centre
  - The Bankside, Borough and London Bridge Strategic Cultural Area
  - The Air Quality Management Area
42. The site has a Public Transport Accessibility Level (PTAL) of 6b where 1 is the lowest level and 6b the highest, indicating excellent access to public transport.

43. The site is located within Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding however it benefits from protection by the Thames Barrier.
44. The following listed buildings are either adjacent to or near the site:
- Christchurch
  - 1 – 3 Stamford Street
  - 43 – 44 Dolben Street
45. The site itself is not located within a conservation area however it is visible from and within the setting of the Roupell Street and Waterloo Conservation Areas, located in LB Lambeth to the west. The site is located within several ‘River Prospect’ views identified by the Mayor of London in the London View Management Framework. This includes views facing the south bank of the Thames from Millennium Bridge and the Hungerford Bridge. The site is not located within an adopted Archaeological Priority Zone (APZ), although is located within the draft ‘North Southwark and Roman Roads’ APZ proposed for adoption within the draft New Southwark Plan.

#### National Planning Policy Framework (NPPF)

46. The revised National Planning Policy Framework (‘NPPF’) was published in July 2021 which sets out the national planning policy. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. Paragraph 2 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

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

#### The London Plan 2021

47. On 2 March 2021, the Mayor of London published the London Plan 2021. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London.
48. The strategic objectives of the London Plan 2021 are to build strong and inclusive communities, make the best use of land, promote a healthy city, optimise housing delivery including affordable housing, conserve and enhance



London's global competitiveness, and move towards a more resilient and sustainable city. Development proposals must comply with the various policies within the Plan and should follow the guidance set out within Supplementary Planning Documents, Guidance and Strategies.

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  
 SD7: Town centres development principles and Development Plan Documents  
 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  
 D10: Basement development  
 D11: Safety, security and resilience to emergency  
 D12: Fire safety  
 D14: Agent of Change  
 H1 Increasing housing supply  
 H4 Delivering affordable housing  
 H5 Threshold approach to applications  
 H6 Affordable housing tenure  
 H7 Monitoring of affordable housing  
 H8 Loss of existing housing and estate redevelopment  
 H9 Ensuring the best use of stock  
 H10 Housing size mix  
 H13 Specialist older persons housing  
 S1: Developing London's social infrastructure  
 E1: Offices  
 E2: Providing suitable business space  
 E3: Affordable workspace  
 E11: Skills and opportunities for all  
 HC1 Heritage conservation and growth  
 HC3 Strategic and Local Views  
 HC4 London View Management Framework  
 HC5 Supporting London's culture and creative industries  
 HC6 Supporting the night-time economy  
 HC7 Protecting public houses  
 G1: Green infrastructure  
 G4: Open space  
 G5: Urban greening  
 G6: Biodiversity and access to nature

G7: Trees and woodlands  
 SI1: Improving air quality  
 SI2: Minimising greenhouse gas emissions  
 SI4: Managing heat risk  
 SI5: Water infrastructure  
 SI7: Reducing waste and supporting the circular economy  
 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  
 T7: Deliveries, servicing and construction  
 T9: Funding transport infrastructure through planning  
 DF1: Delivery of the Plan and Planning Obligations.

#### Greater London Authority Supplementary Guidance (SPG)

49. The relevant London-level supplementary planning documents and guidance documents are as follows:

Character and Context (2014)  
 The Control of Dust and Emissions During Construction and Demolition (2014)  
 Energy Planning Guidance (2020)  
 London View Management Framework (2012)  
 Use of Planning Obligations in the Funding of Crossrail and the Community Infrastructure Levy (2013)  
 Crossrail Funding SPG 2016)  
 Housing SPG (2016)

50. The following draft SPGs and guidance documents were consulted during the determination process of the application:

51. Circular Economy Statements – consultation draft (October 2020)  
 Whole-life Carbon Assessments – consultation draft (October 2020)  
 ‘Be Seen’ Energy Monitoring Guidance – consultation draft (October 2020)  
 Fire Safety (2021 pre-consultation draft)  
 Urban Greening Factor ( 2021 pre-consultation draft)

#### The Core Strategy 2011

52. 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 12 - Design and conservation  
 Strategic Policy 13 - High environmental standards

The Southwark Plan 2007 (Saved policies)

53. In 2013, the Secretary of State issued a saving direction in respect of certain policies. These saved policies continue to form part of the statutory development plan. Paragraph 219 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 2.2 New Community Facilities
  - 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 3.18 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 4.2 Quality Of Residential Accommodation
  - Policy 4.3 Mix Of Dwellings
  - Policy 4.4 Affordable Housing
  - Policy 4.6 Loss Of Residential Accommodation
  - 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

54. The relevant supplementary planning documents and guidance documents from the local development plan are as follows:
55. Blackfriars Road SPD (2014)  
Residential Design Standards SPD (October 2011 with 2015 technical update)  
Affordable Housing SPD (2008 and draft 2011)  
Design and Access Statements SPD (2007)  
Section 106 Planning Obligations and CIL SPD (2015 and 2017 addendum)  
Sustainable Design and Construction SPD (2009)  
Sustainable Transport Planning SPD (2009)

### **Emerging policy**

#### New Southwark Plan (NSP)

56. The New Southwark Plan (NSP) is now at an advanced stage. The NSP was submitted to the Secretary of State in January 2020. The Examination in Public (EiP) for the NSP took place between February and April 2021. The Inspectors wrote a post hearings letter on 28 May 2021 and under Section 20(7)(c) of the Planning and Compulsory Purchase Act (2004) the Council asked the Inspectors to recommend Main Modifications to ensure the Plan is sound.
57. The Council is consulting on the Main Modifications as recommended by the Inspectors from 6 August 2021 to 24 September 2021. The Inspectors will write a report once the consultation has concluded and they have had the opportunity to consider representations.
58. It is anticipated that the plan will be adopted later in 2021 and will replace the saved policies of the Southwark Plan 2007, the Core Strategy 2011, the Aylesbury Area Action Plan 2010, the Peckham and Nunhead Area Action Plan 2014 and the Canada Water Area Action Plan 2015.
59. 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.
60. The Inspectors have heard all the evidence submitted at the Hearings and in previous stages of consultation. The Main Modifications comprise the changes to policies the Inspectors consider are needed to ensure the Plan is sound. The most relevant policies of the NSP are as follows:
  - P1 Social rented and intermediate housing
  - P2 New family homes

P3 Protection of existing homes  
 P6 Housing for older people  
 P7 Wheelchair accessible and adaptable housing  
 P12 Design of places  
 P13 Design quality  
 P14 Residential design  
 P15 Designing out crime  
 P16 Tall buildings  
 P17 Efficient use of land  
 P18 Listed buildings and structures  
 P19 Conservation areas  
 P20 Conservation of the historic environment and natural heritage  
 P22 Archaeology  
 P27 Access to employment and training  
 P29 Office and business development  
 P30 Affordable workspace  
 P34 Town and local centres  
 P41 Pubs  
 P44 Healthy developments  
 P46 Community uses  
 P48 Public transport  
 P49 Highway impacts  
 P50 Walking  
 P52 Cycling  
 P53 Car parking  
 P54 Parking standard for disabled people and the physically impaired  
 P55 Protection of amenity  
 P56 Open space  
 P58 Green infrastructure  
 P59 Biodiversity  
 P60 Trees  
 P61 Reducing waste  
 P63 Contaminated land and hazardous substances  
 P64 Improving air quality  
 P65 Reducing noise pollution and enhancing soundscapes  
 P67 Reducing flood risk  
 P68 Sustainability standards  
 P69 Energy

Site allocation NSP13

61. The application site is located within New Southwark Plan site allocation NSP13 – ‘Conoco House, Quadrant House, Edward Edwards House and Suthring House.’
62. The site allocation sets out that redevelopment of the site must:
- Provide at least the amount of employment floorspace (B class) currently on the site or
  - at least 50% of the development as employment floorspace, whichever is greater; and
  - Provide active frontages with ground floor town centre uses (A1, A2, A3, A4, D1, D2) on Blackfriars Road; and

- Retain or re-provide Edward Edwards Almshouses (C3); and
  - Provide public realm improvements including new routes to Burrell Street and Teveris Street
  - Street.
63. The site allocation also considers that ‘redevelopment of the site should provide new homes (C3).’ An indicative capacity of 124 homes (net) is given across the site.
64. 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 London Plan.

## **ASSESSMENT**

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

#### Introduction

65. The redevelopment of the site would be office led, creating a significant uplift in Class E office space in a tall building fronting Blackfriars Road with an active frontage for the large office reception and public house use (Class Sui Generis) at ground floor level. To the rear of the site, provision of the ground floor community use (Class F2) and smaller scale offices at first floor level, with the residential almshouses above (Use Class C3) would provide a more domestic character to the development, set back behind and overlooking the landscaped community public space and garden, with enhanced public realm along the site boundaries.

#### Policy background

66. The National Planning Policy Framework (NPPF) was updated in 2021. 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. Relevant paragraphs of the NPPF are considered in detail throughout this report
67. 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 and Bankside Opportunity Area

68. The London Plan designates the London Bridge and Bankside as one of 12 Opportunity Areas in the Central London growth corridor area. It notes that this area has considerable potential for intensification and scope to develop the strengths of the area for strategic office provision. This is reflected in Policy SD1 (‘Opportunity areas’) which sets a indicative capacity of 5,500 new jobs and 4,000 new homes.

69. 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, retail and around 25,000 jobs by 2026. Additionally, Strategic Policy 10 states that between 400,000sqm and 500,000sqm of additional business floorspace will be provided within the Opportunity Area to help meet central London's need for office space.

*Central Activities Zone and London Bridge District Town Centre*

70. The site is located within the Central Activities Zone (CAZ) which covers a number of central London boroughs and is London's geographic, economic, and administrative core. The London Plan recognises the well-established long term demand for office space within the CAZ and strongly promotes office provision within this policy area.
71. 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.
72. In addition the site is within the Bankside and Borough District Town Centre. Saved policy 1.7 of the Southwark Plan states that within the town centre, developments providing a range of uses will be permitted, including retail and services, leisure, entertainment and community, civic, cultural and tourism, residential and employment uses.

*Emerging Bankside and Borough Area Vision*

73. The NSP includes a Vision Area for Bankside and the Borough, a designation which the application site falls within. Over the next 20 years, the Area Vision is for new development to deliver over 34,000 square metres of business/office floorspace alongside over 8,000 square metres of retail, leisure and community uses. The Area Vision states that development in Bankside and The Borough should:
- continue to consolidate this area's role within Central London as an international destination for business headquarters, small businesses and tourism that is entwined with local services and open spaces;
  - increase or improve the number and quality of local open spaces, squares and public realm;
  - improve existing and create new cycle routes

*Conclusion on policy designations.*

74. The principle of a large scale development containing a mix of uses including E Class office space, a Sui Generis public house, F class community use and self-contained residential accommodation for elderly occupiers would support the role and functioning of the Central Activities Zone and the Bankside and Borough District Town Centre, as well as being consistent with the policies for the

Opportunity Area and the NSP designation. The acceptability of each use will be considered below.

### Proposed Non-residential land uses

75. As set out above, the site falls within the CAZ, where office and employment uses are strongly promoted. The Core Strategy at Strategic Policy 10 Jobs and Businesses targets the provision of around 400,000sqm-500,000sqm of additional business floorspace over the plan period in the Bankside, Borough and London Bridge Opportunity area (referred to in the 2021 London Plan as the London Bridge and Bankside Opportunity Area) to help meet central London's need for office space.
76. The site does not currently provide office floorspace (although offices currently exist on the other part of the NSP13 site, hence the reference to the need to re-provide office space in any development). The application would provide approximately 30,400sqm GIA of Grade A Use office floorspace, with the potential to provide up to 2,270 jobs. In addition, approximately 420sqm of office floorspace is created at ground and first floor levels beneath the almshouse flats, for use by the applicant, Southwark Charities, and other occupiers. This would primarily be located at 1<sup>st</sup> floor level. The provision of offices satisfies the aims of the Core Strategy and London Plan in creating new jobs and high quality office space within the Central Activities Zone and the Opportunity Area, and of the NSP site allocation in terms of providing more than 50% of the floorspace on this part of the site as offices.
77. The commercial offices of the proposal would provide approximately 19,000sqm net of office space wrapped around the central service core. The open plan floorplates would be able to accommodate flexible layouts tailored to tenants, while full-height windows against the 2.9m floor-to-ceiling heights would provide ample natural daylight and outlook. Louvres would be provided on the upper portions of the windows for solar shading purposes.
78. The primary office floorplates would be complemented by the provision of the extensive roof terrace amenity spaces in addition to the large atrium and mezzanine levels above, able to accommodate flexible working areas. The ground floor public house would also be accessible from within this atrium area by way of a moveable partition wall, providing the opportunity to blend these aspects of the publically accessible areas of the commercial volume of the proposal and enhancing the perception of activity within the Blackfriars Road frontage.

### Affordable workspace

79. London Plan Policy E2 ('Providing suitable business space') seeks the provision of low cost E Class business space to meet the demand of micro to medium sized business as well as start-ups and enterprises looking to expand. The policy requires that proposals for new E Class 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.



80. 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.
81. Emerging Policy P30 of the New Southwark Plan deals with affordable workspace. Criterion 2 of the policy requires Major ‘B Class’ (now E Class) development proposals to deliver at least 10% of the new 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 a space could take depending on the site location, characteristics and existing/proposed uses on site.
82. Taking into account the requirements of emerging policy P30, the proposed development would need to provide at least 10% of the new E Class floorspace as affordable workspace. This would equate to 3,252sqm affordable workspace being required. The applicant has agreed to provide this as part of the proposal. As such the quantum of affordable workspace being provided is compliant with the London Plan and New Southwark Plan policies.
83. The affordable workspace offer would be provided at a 25% discount on the market rent with 6 month rent-free period. 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 the discounts set out above;
  - no more than 50% of the market rate floorspace can be occupied until the affordable workspace has been fitted-out ready for occupation;
  - detailed plans showing final location of affordable workspace are submitted for approval;
  - 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; and
  - the rates and service charges payable by the tenant will be capped.
84. The proposed Affordable Workspace Offer meets the policy requirement in terms of both the quantum of space and the terms agreed which define and control its affordability. This is a positive aspect of the scheme which is supported.

#### Public House

85. Draft New Southwark Plan policy P41 ‘Pubs’ seeks to protect existing public houses which have been subject to development proposals. This is partly on the basis of the contribution to the character of the built environment many public houses, as historic buildings, provide. It is also on the basis of the social and community function public houses provide for the inhabitants of a local area.

86. Given the existing Prince William Henry public house building is of little architectural or historic value, there is no objection to the redevelopment of the building, provided that the pub use is re-provided. Space for a new pub, across two floors, has been proposed, with a frontage onto Blackfriars Road and two areas of outdoor seating. The floor area of the new pub would be 523sqm, over double the size than the existing Prince William. This complies with NSP policy P41, and the site allocation which has a replacement pub as a required use.

### Community use

87. The Core Strategy's Strategic Policy 4 ('Places for Learning, Enjoyment and Healthy Lifestyles') affirms the provision of community facilities and spaces through new development. Saved Southwark Plan policy 2.2 ('Provision of new community facilities') specifically requires that new facilities proposed are open to and able to be used by all members of the community. The draft New Southwark Plan policy P4 ('Community uses') stipulates this also.
88. The proposed community use (Class F2) would comprise approximately 200sqm located in the ground floor of the almshouse building. It would front onto Nicholson Street to the south and the proposed landscape public space to the east and would be managed on behalf of Southwark Charities. The intention is for the use to function as a 'village hall', open to members of the public and is one of a number of ways the development seeks to encourage the potential for interaction between the elderly residents occupying the almshouses and the wider community. On this basis there is no objection to the principle of the proposed community use.

### Proposed new public space with community space on the ground floor



## Residential land uses

89. The site contains a number of existing residential flats. There are six self-contained residential units (Use Class C3) located on the first and second floors of Suthring House, above the existing public house, and 25 almshouse flats to the rear.
90. Saved Southwark Plan policy 4.6 ('Loss of Residential Accommodation') and draft new Southwark Plan policy P3 ('Protection of existing homes') prohibit a net loss of existing housing on a site. On the basis of the proposed 62 almshouse units plus the single caretakers flat, there would be no net loss of existing housing as a result of the development proposal under the terms set out by these policies.
91. The existing 6 units within Suthring House are general needs housing provided on the open market for sale and/or rent. This type of housing would not be provided for within the new development. The proposal contains no housing for private market occupation, but the adopted and emerging policies contain no requirement to reprovide private tenure housing, only that the level of overall housing must not reduce. This is therefore acceptable, and the significant uplift in the total amount of housing is strongly supported.

### Conclusion on land use

92. The provision of office space in this location is strongly supported by the London Plan and adopted and emerging policies in the council's local plan. Providing a mix of uses, including self-contained residential accommodation, in addition to a public house and community use is appropriate for a town centre location such as Bankside. The range of proposed uses would help contribute to both the activity and mix of uses within the CAZ in addition to meeting the needs of the local community. Both of these aspects of land use consideration continue to benefit from strong support in the development plan. The proposal raises no in-principle land use issues and is therefore considered to be acceptable in land use terms.

## Housing

### Affordable housing

93. New Southwark Plan policy P1 ('Social rented and intermediate housing') requires major development to provide a minimum of 35% of housing proposed as affordable housing, measured by habitable room. This requires a minimum split of between 10% intermediate housing and 25% social rent.
94. The proposal has been brought forward by Southwark Charities, who own and run the existing Edward Edwards House almshouses. It would provide 100% affordable housing specifically for the elderly, as a form of specialist 'social housing.' The Edward Edwards House flats are currently provided to existing tenants on site rent free, with a small £25 per week 'maintenance charge'. This is substantially cheaper than conventional social rent levels, and is designed to minimise the number of residents who need to rely on housing benefit.

95. This arrangement would be carried forward within the new development, secured in the S106 agreement. The housing would be secured to ensure that it is retained as at-maximum an equivalent social rent level in perpetuity. While there is no provision of intermediate housing as per the requirements of P1, this is considered to be offset with the unusually high level of provision of social housing within the scheme. The proposal is considered to be compliant with policy P1 in this regard, and would provide very affordable accommodation.

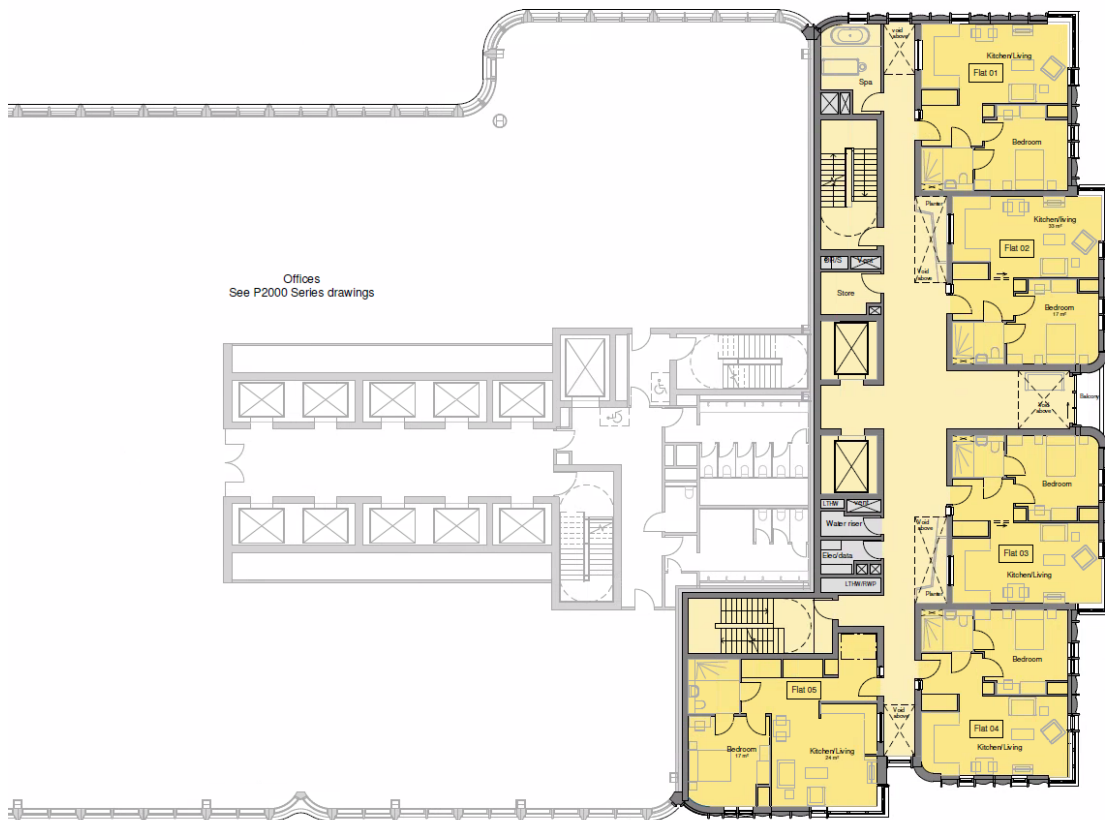
*Provision of housing for older people*

96. Neither the council's saved Southwark Plan policies nor the Core Strategy directly addresses the provision of specialist housing for older people. The London Plan 2021 policy H13 ('specialist older persons housing') supports the provision of housing for older people. Draft New Southwark Plan policy P6 ('Housing for older people') supports the provision in the borough, subject to particular requirements being met. This includes providing social rented and intermediate affordable housing or specialist affordable housing for older people, providing excellent accessibility and amenity for elderly residents and be located in areas suitable for older people such as accessible town centre locations.
97. The level of provision of accessible and communal facilities for the residents would be excellent, comprising a public garden, resident's lounge, social spaces and residential facilities on each floor and a private roof terrace. Further detail on the quality of accommodation is provided below.
98. The site is located within the Borough and Bankside District Town Centre and an area of a high level of public transport accessibility. The site is within walking distance to a large number of shops and services which are utilised by existing elderly residents and would continue to be in the future.

*Quality of residential accommodation*

99. The proposed residential almshouse units would generally be laid out as 5 flats per floor, with paired floors (of 10 flats) providing widened corridors creating social meeting spaces and external communal balcony spaces.
100. The aim of this arrangement is to foster interaction between the residents by providing the opportunity for incidental meeting. Each floor would accommodate a separate drying room and ancillary store facilities for use by residents, carers and building management. The corridors themselves would be generously sized to accommodate further seating, planting and would terminate with a full height window providing natural light and outlook to the north and south.
101. The flats themselves, all one-bedroom units, would typically be between 54sqm – 56sqm GIA, exceeding the minimum 50sqm set out in the council's 2015 update to the Residential Design Standards SPD. Open plan kitchen/living/dining areas (25sqm), bedrooms (16sqm) and bathrooms (5sqm) exceed the minimum standards set out in the SPD. The wheelchair units, located on the southern portion of the block, would be approximately 65sqm and similarly exceed the minimum standards set out in the SPD, comprising a mix of those within the former South East London Housing Design Guide and the standards set out in Part M of the Building Regulations.

Typical almshouse floorplan



102. 25 of the 62 units would be dual aspect, which does not comprise the majority normally required in residential development. Each unit is articulated to give it a side return aspect and the full height windows and Juliet balconies will help maximise aspect and light. None of the single aspect units would be north facing.
103. As a scheme made up entirely of 1 bedroom flats, a higher proportion of single aspect units is inevitable (in most general needs housing developments, it is the larger 2 and 3 bedroom flats which enable more dual aspect flats to be created). The flats are generally high quality, with good daylight levels and generous glazing, and whilst the low proportion of dual aspect flats, and the absence of private balconies (see below) is noted, the reasons are understood and overall the standard of accommodation remains high, and will provide good quality affordable homes for the elderly residents.
104. In addition to the 62 flats, three guest suits are provided for occasional visitors and where necessary overnight carers. At approximately 34sqm these would not be suitable for permanent living accommodation, and a restriction from being used as full-time residential units would be secured in the S106. The caretakers flat would be a 2b3p unit and exceed the council's minimum space standards and would be dual aspect.
105. Due to the close relationship of the proposed residential units to the commercial offices and non-residential uses on the ground and first floors of the almshouse block, conditions regarding sound insulation, vibration, vertical and horizontal sound transmission and internal noise levels are recommended to be appended

to any grant of planning permission.

106. The proposed development, including the residential units, would be required to utilise an active cooling system in lieu of relying on mixed-mode ventilation such as also incorporating openable windows. While it was not considered feasible for openable windows to be relied on for the purposes of natural ventilation due to the high level of environmental noise which would not meet internal residential noise standards during the night time, the proposed design does incorporate large areas of openings at the Juliet balconies for residents.

*Amenity and communal spaces*

107. Following pre-application discussions, the applicant has opted not to provide flats with dedicated external private amenity space but instead to provide Juliet balconies with full height glazed doors. These sliding doors would provide a sense of openness to the units, although they do not provide truly external space.
108. The omission of dedicated private amenity spaces for each unit has been justified by the applicant on the basis that their inclusion for each unit would risk residents being isolated and minimise opportunities for social interaction which are crucial for mental health for older people. Provision of communal amenity spaces in lieu of private ones therefore is another way in which the design of the proposal seeks to encourage socialisation between residents.
109. The 2015 update to the Residential Design Standards SPD sets out that each residential unit is required to provide 10sqm of dedicated private external amenity space, with any shortfall on the 10sqm to be added to the general 50sqm communal external amenity space requirement. Taking into account the 10sqm shortfall on each unit, with 63 units proposed (including the care takers flat) this would equate to the requirement to provide 680sqm.
110. A communal roof terrace amenity space would provide approximately 319sqm. An additional 18sqm would be provided through the communal balconies located within the central bays of each two-floor cluster on floors 3, 5, 7, 9, 11 and 13, providing a total of 339sqm of dedicated communal external amenity space for use by residents. This is a shortfall on the strict policy requirement, however the proposal also provides the large community garden at ground floor level.
111. This would provide approximately 200sqm of a more enclosed soft-landscaped garden area, located directly in front of and accessible from an internal ground floor communal resident's lounge, and a more open, 290sqm area with hard and soft landscaping located to the south towards the corner of Nicholson Street and Chancel Street. These spaces would be publically accessible and for use by both residents and members of the public.
112. It is not customary to count public space provided by a development as meeting communal amenity space requirements, however the proposed provision of these spaces is another aspect of the scheme designed to foster social interaction and minimise risk of social isolation for the almshouse residents. In this instance the bespoke approach is considered to be appropriate and is supported. When counting these spaces as part of meeting the communal amenity space policy requirement, the proposal would significantly exceed the



minimum.

*Proposed almshouse approach from Chancel Street*



113. The proposal would provide a further 142sqm of internal communal space in the form of the ground floor and roof top level resident's lounges, in addition to the dedicated internal areas within the corridors of each floor for seating and incidental meeting totalling 218sqm. A total of 360sqm of internal communal space is therefore provided which, on balance, with the provision of the substantial, publically accessible ground floor community garden, is considered acceptable.

*Conclusions on housing issues*

114. The provision of 100% affordable housing is strongly supported. This does not strictly comply with the council's development plan policies in terms of mix, but this is considered to be offset by the significant benefit such an affordable housing offer would bring to the local community and the borough. The almshouse flats and communal aspects of the proposed residential accommodation would generally be of a high quality, exceeding minimum space standards and, through a mix of private communal amenity spaces, internal communal spaces and facilities, and the publically-accessible community garden, will provide residents with accommodation that has been carefully designed to meet their needs. On this basis the proposed approach to both the affordable housing offer and quality of accommodation is supported.

**Design issues**

115. Paragraph 126 of the NPPF stresses the importance of good design, considering it to be a key aspect of sustainable development. Chapter 3 of the London Plan deals with design related matters. In particular, Policy D4 focuses on delivering and maintaining good design, D5 on inclusive design and Policy D9 sets out the requirements for the development of tall buildings. The heritage polices of the

London Plan, set out in Chapter 7, assert that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.

116. 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, and 3.18 of the Southwark Plan. Saved policy 3.20 deals specifically with tall buildings. 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.

#### Site context

117. The existing Suthring and Edward Edwards House date from the 1970s, constructed in red brick in a simple functional style typical of the period. Suthring House is a three-storey residential block facing onto Blackfriars Road. It includes a pub at the ground floor and flats above. Edward Edwards House is a two-storey courtyard block of older persons housing located to the rear of the site and fronting onto Nicholson Street and Chancel Street.
118. The pub is accessed from Blackfriars Road, through an external seating area surrounded by a low wall. Main access to the residential properties is located on Nicholson Street which also includes the service access to the pub. The buildings are of little architectural or townscape value from a public perspective.
119. The site sits within a varied context, with neighbouring 1970s buildings Conoco and Quadrant House and associated car park to the north, the railway viaduct and smaller scaled Victorian buildings to the east, the low rise Rochester housing estate to the south and larger scale commercial buildings fronting Blackfriars Road to the south and west. Further north are a number of much taller buildings, recently completed or under construction, including 1, 18 and 240 Blackfriars Road and on the site of the former Ludgate House.

#### Proposal

120. The planning application is for the clearance of the existing buildings on the site; the excavation of three basement levels; and the construction of a new tall building, comprising part 22 and part 15 storeys, plus an additional storey of plant, reaching a maximum height of 91.8m (AOD). The development would include a landscaped public space on the eastern section of the site to provide a community garden.
121. The building is designed as two distinct volumes clustered together, distinguished through their massing and architectural treatment. The larger scale commercial offices would be to the west, fronting onto Blackfriars Road above the public house and large office reception. To the east, the building steps down to provide almshouse flats set above the ground and first floor offices, and a community centre.



122. The basement would include an additional level for plant as well as ancillary cycle storage and changing facilities. Although constructed as a single building, the two primary elements (the offices/pub and the almshouses) would function entirely independently.

### Site layout

123. The proposed site layout and building footprint is well-conceived both in presenting active frontages to the primary streets, an improved east-west route along the north of the site, and new public realm primarily to the east.
124. Locating the larger scale office element towards the Blackfriars Road frontage, where there is a concentration of larger scale commercial buildings, is a logical and appropriate response to the site's context. At the front the building is set back to create a generous footway along Blackfriars Road. The pub is located on the north-west corner with a clear and distinct entrance and frontage to give it presence, and an area of outdoor seating albeit smaller than existing. At the south-east corner is the double-height entrance lobby of the commercial building.
125. The existing public route running along the northern boundary of the site would be retained and enhanced. This is currently a publicly accessible route, used by commuters to and from Waterloo station. The improved route would create further opportunities which come forward for any redevelopment of the buildings to the north with linked spaces.

### Proposed site layout showing ground floor uses and functions



126. The lower element of the building, to the east towards Chancel Street, would contain the almshouses, the community space and charity office space. This reflects the more residential character of Chancel Street, although the building would be noticeably larger than its neighbours. In this location, the building is set back to provide the community garden taking up the full width of the site. This not only helps to provide the residential element with an open outlook but also offers some breathing space on Chancel Street that helps to mitigate its scale.
127. The new community garden would be visible from Blackfriars Road along

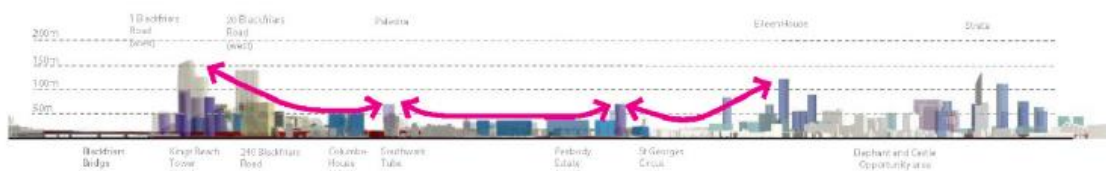
Nicholson Street with a feature tree proposed at the corner of Nicholson Street and Chancel Street. The garden would otherwise be revealed as pedestrians travel from through the smaller network of streets to the east and south, such as Treveris, Dolben and Chancel Streets.

128. Service access is proposed from Nicholson Street for both the commercial and the residential parts of the building. Given the constraints, this arrangement is considered acceptable in principle. Further consideration of the detailed servicing and access arrangements are set out in the Transport section of the report below.

## Built form and scale

### Building heights – site context

129. The site is surrounded by buildings at a variety of scales, with the dominant character established by those of a larger scale flanking either side of Blackfriars Road, and typically defined by the period of that building's development.
130. The design and scale of recent development has been informed by the policies set out in the development plan, including the Core Strategy (2011) and the London Plan (2021), in addition to supporting guidance, such as that set out in the Blackfriars Road SPD (2014). The NSP Blackfriars Area Vision (AV.04) broadly reflects the guidance and approach to development in the SPD.
131. Guidance under SPD 5 ('Building heights') of the SPD states that the tallest buildings should be located towards the northern end of Blackfriars Road, with the tallest elements located around the junction of Stamford and Southwark Streets. It does not specifically define the extent of the area where very tall buildings would be appropriate.
132. The Background Urban Design Paper published with the SPD tested the capacity of the area and articulated the height profile of Blackfriars Road. It distinguishes the northern half of Blackfriars Road (north of the railway bridge) from the southern half and illustrates how the heights should undulate between the core of the cluster (around 180m tall) at the northern end of Blackfriars Road and the two 'local landmarks' (around 70m tall), one around Southwark Station and the other at St George's Circus.



133. Recently implemented and consented developments generally reflect the principles defined by the SPD and include, on the western side of Blackfriars Road, the core of the emerging cluster as defined by 1 Blackfriars completed in 2018 at 170m tall and 18-20 Blackfriars consented at 185m tall. Other

developments then step down to the prevailing height and include The Hoxton at 32-40 Blackfriars Road completed 2019 (64m tall) and the Ibis/Novotel at 46 – 49 Blackfriars Road completed in 2012 (48m tall).

134. On the eastern side of Blackfriars Road the developments range from the 170m tall Ludgate House (now Bankside Yards) development (currently on site) and include 240 Blackfriars Road completed 2014 (89m tall).
135. The site is located in the northern half of Blackfriars Road where buildings are expected to step down from the tallest buildings (around 180m tall) at the core of the cluster, reducing in height as the road moves southwards towards the railway bridge. The SPD states that buildings which are significantly higher than 50m must demonstrate that they contribute positively to London's skyline both locally and in distant views, and make an exceptional contribution to the regeneration of the area.
136. The SPD also sets out a number of criteria for all tall buildings to comply with, many of which have been carried forward into the draft New Southwark Plan policy P16. More information on the extent of compliance with the criteria is set out in the assessment below.

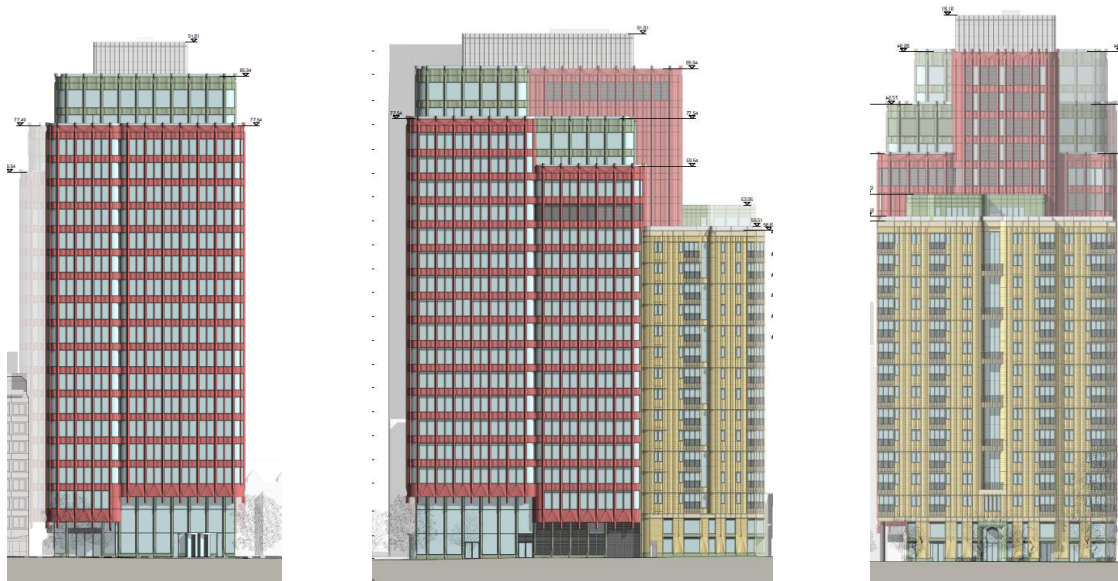
*Scale, height and massing*

137. The proposal is for a large single building articulated as two stepped volumes – the larger-scaled office element located in the western portion of the site, at a maximum of 22 storeys, and the smaller scale residential-led element to the east, at a maximum height of 15 storeys. The commercial office element would have a maximum height of approximately 92m AOD (inclusive of rooftop plant enclosures) and is arranged as four extruded elements clustered together around the central core. From the maximum height of 92m each element steps down from the service core, and create a main parapet height onto Blackfriars Road of 78m AOD. This stepped down profile would, when viewed from the northern and southern elevations, form a cascade in mass towards the smaller-scale context to the east of the site. The eastern almshouses volume is set down a further 2 storeys from the lowest commercial office element and tops out at 15 storeys.
138. The southern, northern and western elevations would additionally be subject to vertical subdivision within their façades by way of architectural treatment. For the north and southern elevations, here the crease would contribute to forming three similar-width volumes with two thirds comprising the commercial office (distinguished by use of a 'crease' within the façade, intended to reference pinched fabric) and then the final third comprising the almshouses block. This approach helps to break up the mass of the building whose southern elevation would be visible as part of the townscape especially from the south and east.
139. The western elevation overlooking Blackfriars Road is the primary commercial frontage of the building and the development's tallest element. From longer views, including from the Roupell Street Conservation Area, the elevation would express its design as clustered elements both by the two storey step-down on the top, and the deep fabric-like crease running up the façade, where the two elements meet. The crease would break up the building's mass, increasing the

verticality of this element of the proposal.

140. In contrast to the unified appearance and continuous ribbon-windows of the commercial building, the almshouse building on the east would have a finer grain and a more domestically-scaled treatment in architectural detailing. This helps to distinguish the almshouses from the commercial block, reading as a separate element. At 15 storeys it will form a lower-scaled foreground to the commercial office volume on Blackfriars Road, and in longer views help provide an overall reduced bulk to the building. At the ground level, the building is set back behind a publicly accessible and generous community garden which softens the impact of its scale.

Proposed west, south and east elevations



141. The building would be of a similar scale to 240 Blackfriars Road to the north and would sit comfortably within the context of neighbouring contemporary developments on Blackfriars Road. It is also of a similar scale to the lapsed permission to redevelop Friars Bridge Court to the east (although little weight can be afforded to this permission since it is no longer capable of being implemented).
142. It would be substantially lower than the buildings in the early stages on construction at 18 Blackfriars Road to the north. It would be taller than the nearby Hoxton, located to the north of Friars Bridge Court on the west side of Blackfriars Road. This is not considered inappropriate however as both buildings have a similar sense of scale to their frontages, borne of both width and height and architectural treatment, which contribute to the sense of a civic-boulevard that the Blackfriars Road SPD seeks to foster.
143. However, the building is clearly much taller than its local neighbours to the south and east, and as a result will dominate these parts of its context. The low rise buildings to the immediate south means that in these views the building will be very prominent, although clearly viewed with the backdrop of the very tall buildings further north.

144. It is a large scale building, seeking to provide a variety of functions across different land uses, including the provision of new publicly accessible space. The scale, height and massing of the proposal is considered an appropriate response to the site's context, notwithstanding the contrast with immediate neighbours to the south, and would make good use of what is currently an underutilised site on a major road in central London. The scale and mass has been suitably articulated, both through the building's distinct volumes and, as elaborated on below, the architectural treatment.

### Architectural treatment

145. The architectural design of the building helps to distinguish its two constituent parts whilst maintaining a common and unified language. The commercial volume on Blackfriars Road defines the architectural language for the development and the residential almshouses use the same visual language but softened with residential features like Juliet balconies and a change in the colour, tone and detailing of the lead material. In both instances the primary material of the building would be textured terracotta cladding, for the former an earthy red-orange, and in the latter a yellow buff-coloured finish. The buff colouration of the almshouses is intended to reflect the Victorian character of Chancel Street.
146. Each element is divided vertically into three well-defined parts, a base, middle and top which help to articulate the overall volume and skyline of the building and ground it appropriately. Both elements are complemented with green-coloured highlights at their respective base and top elements of the building. Terracotta is an appropriate material for the building and reflects the historic context of Blackfriars Road. This modern reintroduction of this traditional material contrasts appropriately with the more 'glassy' character of other taller buildings nearby.

### Commercial office volume

147. The southern portion of the base of the commercial element fronting Blackfriars Road is designed with a generous inset triple height glazing-led atrium demarcating the primary access to the commercial office space. To the north, the public house frontage has a similarly glazed frontage, albeit with the triple height scale reduced to double height.
148. Both aspects of this frontage will help provide interest along an active frontage to Blackfriars Road, including views into the multi-layered mezzanine aspects within these parts of the building. The strong green vertical mullions running along the base would provide a distinctive colour scheme to the site, contrasting with the red terracotta of the floors above in addition to complementing and continuing the colour scheme of the base of the glazed tiles of the Edwardian Soap Factory building located to the immediate south.
149. The terracotta façade has been designed with rounded folds or pleats and includes rounded corners to give it the appearance of stretched fabric – a nod to the site's historic use for 'tenting' fields as part of London's textile industry. This extends to the inclusion of hanging peg-like features (tenter hooks) suspended above the inset glazed element at the base of the building. These folds or pleats

together with the 'hooks' give a strong verticality to the elevation of the building.

150. This motif is carried up through the building's west, north and southern façades with vertical threads protruding as parapet elements towards the top of the building. As each element on the main building steps down the core will be visible from a distance. The set-back elevations to the core at the upper-most storeys of the building are also clad in wave-form terracotta panelling in a green scheme to match the base.

#### Residential almshouses

151. The 15 storey residential volume to the rear of the site similarly utilises both a terracotta-led materials pallet, here in a yellow buff-like shade, as well as a fabric-like motif of curved façade panels.
152. Architecturally this element of the proposal is more understated than the commercial element. This is considered appropriate given both the quieter, more domestic nature of the residential use for this part of the building and the immediately adjacent sites, in addition to the chosen shade of terracotta better matching, rather than standing out from, the neighbouring historic buildings and railway viaduct constructed in typical London stock brick.
153. The primary eastern elevation would be split into 5 distinct bays, with the primary windows and Juliet balconies, and a central bay, containing the social spaces appearing as double height glazing with balconies every other floor. Vertical 'threads' and the curved terracotta panels continue the fabric motif from the commercial front of the building.
154. The base of the building is double height, with glazing affording light and views into and out of the community space, office elements and resident's lounge located here. Matching green horizontal elements, in addition to the primary entrance to the almshouses located within the central bay, would provide both a contrast to the yellow buff-led façade above in addition to an architectural connection to the otherwise distinct commercial volume to the west. At the roof level the almshouse building includes a set-back resident's lounge and landscaped terrace. This helps to complete the building appropriately and chimes with the visual language of the development.

#### Conclusion on architectural treatment

155. The architecture uses coloured terracotta coupled with devices and motifs inspired by the historic use of the site as a location of London's textile industry. This results in a building that would not only stand out from its more glassy neighbours, but also provide an elegant and highly articulated design that is inspired by the history of the site. The architectural treatment successfully links the two uses with a common but distinctive character. On this basis the proposed approach to the architectural treatment is supported by officers and would make a unique and successful contribution to the Blackfriars Road and the immediate area's streetscapes.

## Tall buildings

156. The building reaches a maximum height of approximately 92m AOD, and would be significantly taller than the immediately neighbouring buildings to the south and east, which is characterised by low rise heights of between 3 and 6 storeys. However, the scale of neighbouring buildings increases to the west and north of the site progressively along Blackfriars Road, as described above. The site is located within the CAZ and Opportunity Area, where such high-rise intensification of development is potentially appropriate. Nevertheless, a tall building is expected to also comply with policy saved Southwark Plan policy 3.20 ('tall buildings') in full. These requirements are assessed below.

### *Point of landmark significance*

157. The northern part of Blackfriars Road is recognised in the Blackfriars SPD as a location of landmark significance with the cluster of tallest buildings focused on the junction of Blackfriars Road and Southwark/Stamford Street. The locality not only stands at the confluence of a number of arterial routes but also includes the primary bridge link to the City of London and a station at the river crossing. The SPD acknowledges this and illustrates this site as being within the area mediating between the super-tall buildings at the core and lower scaled development nearby. At 92m the proposal is consistent with the principles set out in the SPD.
158. Through the guidance set out in the Blackfriars Road SPD, the strategy for permitting the tallest buildings to the north, and reducing in height to the south (with taller 'markers' in key locations), contributes to establishing the Blackfriars Road cluster as a central London landmark. This site, clearly subservient in height to the buildings to the north, which rise to a maximum height of 185m AOD, would successfully contribute to this strategy. Whilst it is noted that it stands taller than the arc indicated in the SPD (and included above), this diagram is only suggestive of a general hierarchy, not a literal distribution of height. The site is located within the CAZ and within the immediate surroundings of other tall buildings (both existing and consented). As such the application site is considered to be an appropriate location for a tall building.

### *Positive contribution to the landscape*

159. Of the site's 0.34ha area, over a third (approximately 1,245sqm) would be given over to open accessible space providing a variety of functions, including 885sqm of public realm, approximately 200sqm for the resident's garden, and the public house external seating area of approximately 90sqm. This represents an increase of close to 700sqm, compared to the current approximately 500sqm, in the form of the existing public house external seating and hard standing public realm.
160. The proposed architectural treatment to the commercial volume, including use of the 'crease' in upper storey facades, in addition to the level and arrangement of glazing to the lower storeys fronting the public realm, would help to demarcate the location of the change in ground floor uses between the public house and office atrium fronting Blackfriars Road.



161. Overall, the improvements to the public realm, in addition to the new community garden, would provide a generous and attractive mix of hard and soft landscaped publicly accessible space and the landscape contribution is considered to be commensurate with the scale of development.

*Highest architectural standard*

162. As set out above, the proposed building is considered to have a successful and logical massing strategy, reflecting the two primary uses, and the architectural treatment reinforces this approach. The proposed architectural treatment of the façades, as detailed above, would provide a distinctive and visually interesting contribution to townscape views within the immediate and wider area. The proposed quality of office and residential accommodation is considered to be of an excellent standard.

*Relates well to its surroundings*

163. The proposed building seeks to relate to its more contemporary neighbours on Blackfriars Road in terms of scale and character, reflecting more recent developments such as The Hoxton, located to the immediate north west, 240 Blackfriars Road, and the planned 18 Blackfriars group of buildings. For comparison, it stands at a very similar height to 240 Blackfriars Road.
164. The reduction in height to the east is necessary to better relate to the smaller-scale character of the neighbourhood to the immediate east. Notwithstanding this reduction in height of the eastern element of the building, it will stand noticeably taller than the neighbouring buildings around Chancel Street and Bear Lane. As demonstrated by the images presented of local views, this building will be very prominent in some views due to the jump in scale. The success of the building in not appearing overbearing or unduly dominant is heavily reliant on the architectural detailing and the sculpting of the form on the upper levels. On balance, it is concluded that the building can make a suitable contribution to its surroundings when viewed in the round.

*Positive contribution to the London skyline*

165. The application was supported by a Townscape Visual Impact Assessment (TVIA). The site is not within protected 'London Panoramas' viewing corridors set out in the London Plan's London Views Management Framework (LVMF). It is within several 'River Prospect' views identified within the LVMF which have been tested within the TVIA. The site is located within Borough View 5, looking south from the Millennium Bridge, as identified in policy P21 'Borough views' of the NSP. The building would be visible in a range of longer views within the London skyline including from Southwark Bridge and from the Hungerford Bridge. It would generally be seen within the context of the emerging Blackfriars Road cluster, which is subject to a number of taller proposals currently under construction. In these views from the north, the building would largely appear subservient and as a secondary building in these skyline views and would not appear out of character for the area.
166. In TVIA View 9 from the Millennium Bridge (NSP Borough View 5) the proposal does not affect the silhouette of the Tate Modern building which is the Strategic



Landmark in the View and follows the effect of the stepped profile of the emerging cluster. Whilst it is visible in this view next to Bankside Lofts and 240 Blackfriars, there is no harm arising and the proposal appears as part of the distant backdrop.

TVIA 9 from the Millennium Bridge (NSP Borough View 5)



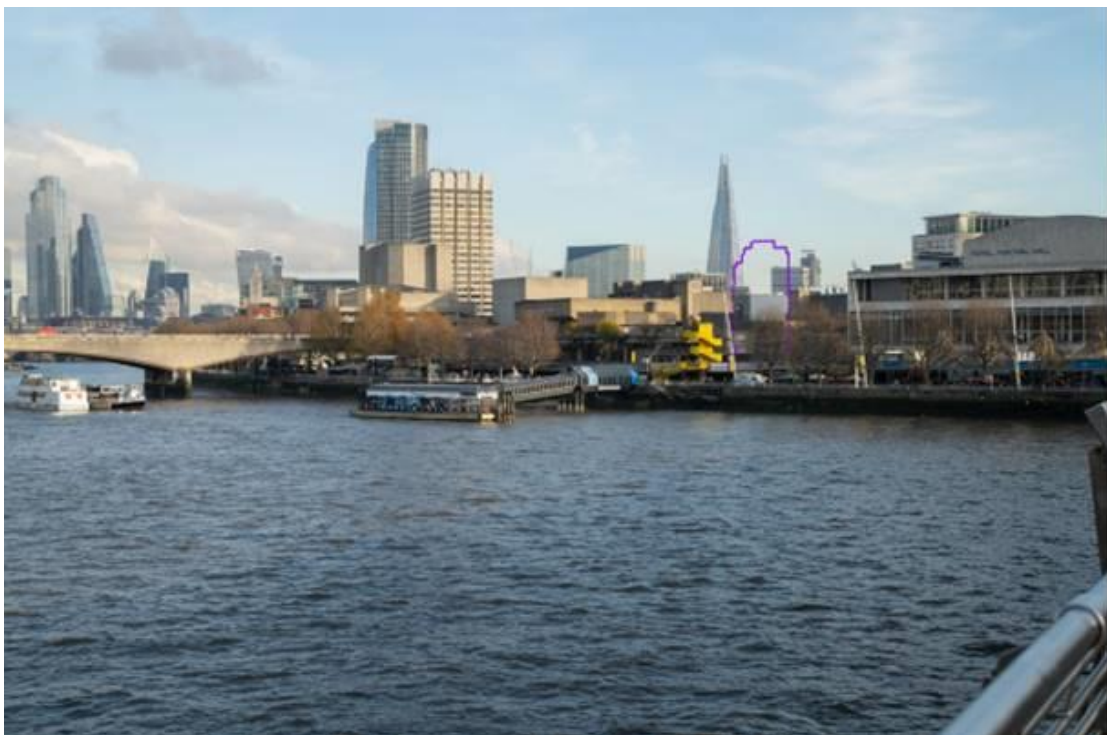
167. In TVIA View 14 from Southwark Bridge (LVMF View 12A.2), the proposal is completely masked by the Tate Modern extension) and the tallest of the Neo Bankside towers. As a consequence there is no harm arising and the Strategic Landmark of Tate Modern, including the lower townscape of the Globe and its environs remain unaffected by this proposal:

TVIA View 14 from Southwark Bridge (LVMF View 12A.2)



168. Finally in TVIA View 15 from Hungerford Bridge (LVMF View 17B.1) the proposal will appear in the distant backdrop in the gap between the Royal Festival Hall and the Hayward Gallery. The proposal does not affect the viewer's ability to recognise and appreciate these important landmark buildings and does not affect the principal focus of this view which is towards St Paul's Cathedral to the north of the river and a considerable distance from the proposal. There is no harm arising as a consequence to this important River Prospect:

*TVIA View 15 from Hungerford Bridge (LVMF View 17B.1)*



169. The articulation of the massing with the progressive step backs would be particularly effective in providing a distinct form in these views. In conjunction with the unique approach to architectural treatment of the façade and colour of the tallest, and so more prominently visible, commercial volume, the overall approach would ensure the proposal provides a distinctive tall building which contributes positively to the Blackfriars Road cluster and wider London skyline.
170. Further comment in relation to the impact of the building on local townscape views, including particularly with regards to the impact on heritage, is set out later in the report.

*Visibility from the wider area*

171. The submitted Townscape Visual Impact Assessment (TVIA) also includes a number of views and accurate visual representations of the proposed development from points around the local area. The views demonstrate that the building would be visible from a number of locations in the immediate vicinity of the site and further afield.
172. From the broadest easterly direction (including north east and south east) the building would feature prominently in selected views through the local townscape. It would mark a clear step-change from the lower rise surroundings to the east in the site's immediate vicinity and affirm the larger-scale character of Blackfriars Road itself. Given the successful approach to the articulation of both the massing and façade elements described above, the impact is not considered to be harmful.
173. The building would clearly contribute to the townscape of Blackfriars Road itself, providing a large robust façade. Due to the linear nature of the road, at some points the proposal would become less prominent, being obscured by other neighbouring buildings. This is generally the case when the proposal is viewed from further north on Blackfriars Bridge.
174. There are particular points along the road however (such as at the junction with Stamford Street to the north or The Cut to the south) where the building would provide a dominant presence in the immediate streetscape. The strength of the proposed approach to the façade and massing is however considered to adequately mitigate any sense of excess bulk and therefore harm to the streetscape in these instances.

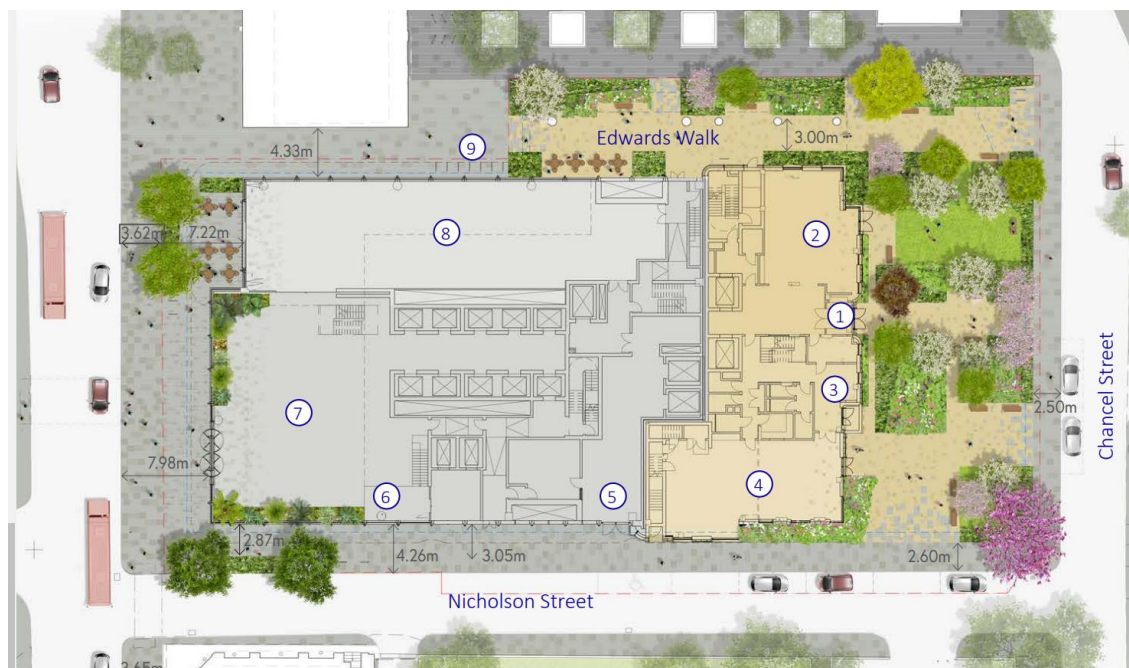
*Conclusion on tall buildings*

175. The proposal complies with the tall buildings policies as set out in the Core Strategy, the saved policies of the Southwark Plan and the Blackfriars Road SPD. The information submitted with the application demonstrates that this is a proposal of exceptional architectural quality with a highly articulated and complex form which successfully marries the commercial and residential functions. It will relate well to the other tall buildings in the locality and successfully articulates the change in scale from the tallest buildings in the north to the lower scaled buildings to the south and east.

## Landscaping, trees and urban greening

176. The proposal would accommodate a substantial level of hard and soft landscaping across the site, most notably in the form of the public community garden. The proposal would see the removal of 6 small semi-mature trees from and adjacent to the site, however this would be more than adequately mitigated by the proposed planting of 24 trees on the site. These would be located predominantly within the community garden and the east-west pedestrian route along the site's northern boundary. In addition, the proposal would provide general upgrading of public realm and landscaped roof terraces on the upper storeys of the building for both the residential and non-residential occupiers and extensive green roofs.
177. The primary east-facing elevation of the residential almshouses block would accommodate climbing plants within its central bay. These would be utilised also on the southern elevation of the commercial office volume above the landscaped amenity terraces provided for office occupiers. This strategy overall would see the development achieve an Urban Greening Factor of 0.38. Commercial development is required to achieve a UGF score of 0.3 while residential development is required to achieve 0.4. Given the site is predominantly non-residential, and that this has been increased from an initially proposed 0.24 score, this is considered to have been maximised and is acceptable.
178. The proposed community garden area at the east end of the site would total approximately 550sqm and be split into two distinct parts: To the north, a more private, but still publically accessible soft landscaped area would be sheltered with a variety of small fruiting mutli-stem species of trees and shrubbery around a grassed enclosure. This would be located off and considered an extension of the residents communal lounge set into the ground floor of the almshouse volume.

### Proposed ground floor landscaping strategy





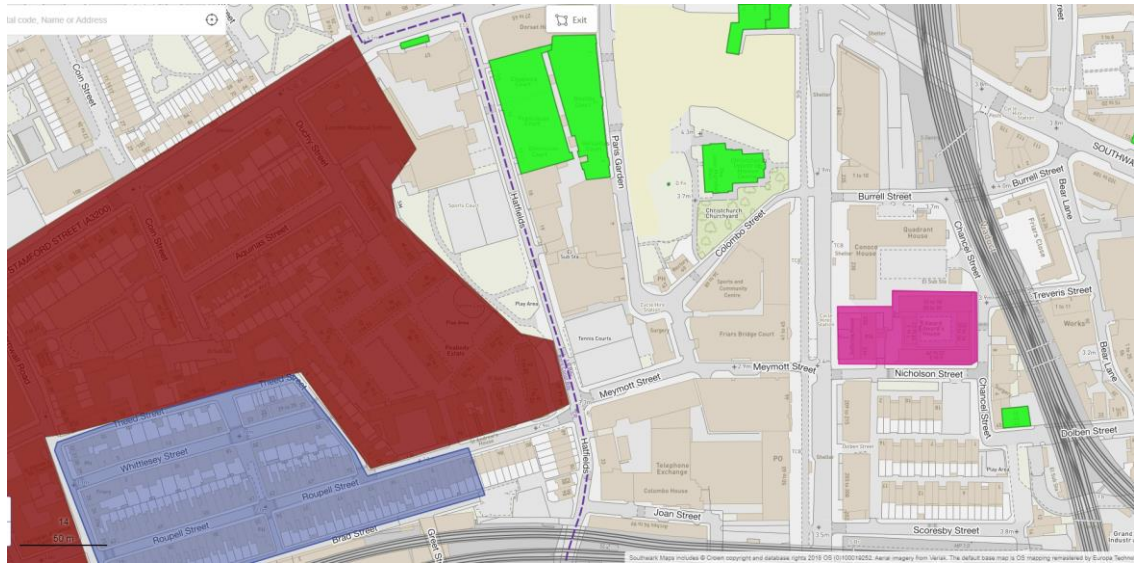
179. To the south, located on the corner of Nicholson Street and Chancel Street, the space would accommodate a greater level of hard landscaping, primarily in sandstone, and provide a more open, but still generously planted area. In addition to supplementary planting of trees and shrubs within soft landscaped elements, a large 'feature' tree or sculpture would be positioned at the south-eastern most corner of the space to attract views from Blackfriars Road.
180. The site's boundaries to the east (fronting Blackfriars Road) south (fronting Nicholson Street) and a portion of the north (along Edward's Walk) would be paved with high quality York stone slabs. Hard landscaping along the remainder of the northern frontage would comprise sandstone paving enclosed by a variety of low shrub and hedge species as the route transitions towards the community garden to the east. Planting would also be accommodated on the boundaries of the inset public house seating fronting Blackfriars Road, in front of which two street trees would be planted.
181. The commercial office volume would accommodate landscaped amenity roof terraces on levels 17, 18, 19 and 20 at the points of the building's cascading set backs within the mass. The almshouse resident's volume would similarly accommodate a private roof terrace amenity space with primary aspect facing south and east.
182. Both of these sets of amenity roof terraces would be provided with a mix of hard and soft landscaping including, as noted above, climbing plants on the enclosing elevations. Species and positioning of the greening and landscaping at these levels taking into account drainage, wind and shade. A condition setting out the full details of species and landscaping specifications is recommended to be appended to any grant of planning permission.

### **Heritage**

183. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and its setting and to pay "special regard to the desirability of preserving or enhancing the character or appearance of that area". Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to have "special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses".
184. The NPPF provides guidance on how these tests are applied, referring in paras 199-202 to the need to give great weight to the conservation of the heritage asset (and the more important the asset, the greater the weight); evaluate the extent of harm or loss of its significance; generally refuse consent where harm is substantial; and, where necessary, weigh this harm against the public benefits of the scheme. Para 203 goes on to advise taking into account the effect of a scheme on the significance of a non-designated heritage asset.
185. The application was supported by a Heritage Statement which assesses the impact of the proposed development on local heritage assets located within the setting of the site.

## Impacts on local heritage assets - listed buildings

### Designated Heritage Assets



- Waterloo Conservation Area
- Roupell Street Conservation Area
- Grade II Listed Buildings
- Application site

186. As set out above, the site is located within the setting of several designated and undesignated heritage assets. The following Grade II listed buildings are close to the site:
187. To the north west, located on the opposite side of Blackfriars Road to the site:
- Christ Church, Blackfriars
  - No.s 1 – 3 Stamford Street
188. To the south east:
- 43 – 44 Dolben Street
189. No.s 45 Dolben Street and 4-8 Chancel Street have been identified as non-designated heritage assets located in the immediate vicinity of the site to the south east.

### Dolben Street and Chancel Street

190. The two former town houses at 43-44 Dolben Street are grade II listed constructed in the later Georgian period. Their interior has been remodelled into one but they retain good exterior classical hierarchy with mansards. They were once part of a wider Georgian Street leading east/west.
191. The buildings' setting has seen many changes since construction with the loss of the rest of the street, the construction of the railway viaduct and the redevelopment of the area in the post-war period. They form a group with the

unlisted buildings at 45 Dolben Street and 4-8 Chancel Street as a good example of piecemeal mixed use 19<sup>th</sup> century development during the expansion of central London.

192. Their immediate setting is the urban street network of the railway viaduct, almshouses and Rochester estate with car park and green space on Nicholson Street, allowing for glimpsed views of the rear of the terrace on Dolben Street and framed views of the gable on Chancel Street. Their wider setting is the large development on Blackfriars Road, and its status as a principal street within the neighbourhood.
193. The buildings as a group are an historic anomaly in streets to the west of the viaduct which were comprehensively redeveloped in the post war era, with the exception of 209 to 215 Blackfriars Road. Much of the enclosed street pattern of the area was lost, and the construction of the Rochester Estate has eroded the previous network of streets and the historic setting, meaning the current setting does not allow for the significance of the buildings to be sufficiently appreciated.
194. The principal scale of the proposed development fronts Blackfriars Road, with the lower 15 storey element to the rear, closer to Chancel and Dolben Streets. The proposed open space allows for views across from the north and an improved landscape setting to Chancel Street and Dolben Street properties. The views of the gable at 6 Chancel Street would be preserved.
195. On balance, the scale of the development in close setting would dominate the buildings and their setting, however as the historic setting has been eroded through previous redevelopment, there would be minor, if any, harm to the significance of the buildings. In making a decision, the overall public benefit should be weighed in the balance against the minor harm to the significance of the building, as per para. 202 of the NPPF.
196. Harm has been minimised by the landscaping of the open space to the rear of the site which will create a street level buffer between the heritage assets and the development. The repaving of Nicholson Street would bring enhancements to the street paving.

#### *Christchurch Southwark*

197. The church is a detached building set in mature gardens facing Blackfriars Road. It is located on the east side of the street, approx. 300m from the site and is grade II listed. Constructed in 1958 after a fire destroyed the original building during the Blitz, the building was listed in 2010. The listing description mentions the stained glass windows as being of particular note.
198. Constructed in brick with simple Neo Georgian nave and tower at east end, the building sits back from Blackfriars Road within a mature planned garden, which provides a break in development along the street. Surrounding developments shield the building from views from wider vistas. While the scale of some of the buildings could be seen by some as in part eroding the setting of the building, the space (including views from Colombo Street) and mature trees in the immediate vicinity of the church still provide access to a 360 degree view of the

building in close quarters, and a break in development when travelling along the street.

199. There is no direct inter-visibility between the church building and the site owing to the set back of the church from Blackfriars Road, and the corner of no. 40 Blackfriars Road blocking the view, however the trees towards the front of church gardens are visible when standing on the pavement looking north from the street. As the main experience of the church is within a highly urban context of other tall buildings, and the proposal are of this typology and separated by some distance, the proposals would have a neutral impact on the significance of the asset.

#### 1 Stamford Street and 3 Stamford Street

200. 1 and 3 Stamford Street are two grade II listed buildings located on the west side of Blackfriars Road, approximately 500m to the north. The buildings are located at the junction of Stamford Street, with no.1 a corner building facing the street. No .1 has a direct relationship with the junction, its front door facing the street, while no. 3 faces Stamford Street. The buildings are remnants of Victorian town centre development along Blackfriars Road, however now are surrounded by large development sites to the south, and the landmark tall building of One Blackfriars opposite to the north. Their setting, like Christ Church is highly urban, with a major historic thoroughfare being part of this experience. 1 Stamford Street is on Historic Englands' at Risk Register.
201. The proposed development is some 500m to the south and on the east side of the street. There is some very fleeting glimpsed visibility between the pavement outside the development site and the corner of Stamford Street, however looking north, this is set within the looming context of One Blackfriars, while looking south, the future 18 Blackfriars development will be prominent, as well as the façade of 240 Blackfriars Road, and the angled upper stories of Palaestra beyond the site. The busy atmosphere of Blackfriars Road, plus public realm including street trees and street clutter is also part of this experience whether travelling through or stationary. There would therefore be no impact on the significance of the assets, by altering one minor part of the listed buildings' setting.

#### Roupell Street and Waterloo Conservation Areas

202. The site is not located within a conservation area. It is located within the setting of the Roupell Street conservation area and a portion of the Waterloo Conservation area. Both are situated within the London Borough of Lambeth. This lies approximately 190m to the west of the site and comprises a distinct and well preserved network of streets hosting small terraced dwellings.
203. The Roupell Street Conservation Area is an historic enclave in a district which has otherwise experienced large scale redevelopment. Developed between the 1820s and 1840s, it comprises uniform streets of terraced housing, incorporating corner shops and a public house. The streets, Theed Street, Roupell Street and Whittlesey Street, represent an impressive and little-altered example of their type.



204. The significance of the conservation area is as a good and well preserved example of early 19<sup>th</sup> century artisan housing in a planned formal arrangement in terraces, using simple typology of houses fronting the street in London stock brick and timber windows. Roupell Street itself has a handsome streetscene, with two storey terraces with butterfly roofs visible from the street. Many of the terraces are grade II listed.
205. The wider setting includes a mix of 3 to 6 storey buildings, including the Victorian planned social housing tenement blocks of the Peabody Estate on Hatfields and the grade II listed St Andrews House development (now language school) also on Roupell Street.
206. In the vicinity and immediate setting of the conservation area is the modern 10 storey block of Colombo House and the upper storeys of the Novotel on Blackfriars Road. These form a clearly established part of the scale of development fronting Blackfriars Road. As the proposed development forms part of Blackfriars Road and fronts it to the east side, the wider part of the conservation areas setting would be affected.



207. The immediate setting of the conservation area, the Peabody Estate and the St Andrews House complex were constructed also during the Victorian era, and are part of the urbanisation of the area during the 19<sup>th</sup> century. These are located in the adjacent Waterloo Conservation Area. With Roupell Street, they form a group of assets whose significance lies in a planned formation of social housing and working class facilities for the local people of the time. This is evident in their form, function and architectural detailing.
208. There is further social housing of a similar 2-5 storey scale, also in the close vicinity dating from the mid to late 20<sup>th</sup> century in the east of Roupell Street, also within the Waterloo Conservation Area. This reinforces the character of the street

and preserves the significance of the conservation area by repeating the form and scale of the dwellings on Roupell Street.

209. Blackfriars Road has been a major throughfare since the 18<sup>th</sup> century, forming part of the “Blackfriars Mile”, linking Elephant and Castle to the South Bank and beyond to the City. The width of the street, plus the scale of the buildings historically on the street reflect its location within central London; since the late 20<sup>th</sup> century, the street has seen high rise and tall building development along its length.
210. A number of such buildings are clearly visible from Roupell Street conservation area and within the setting of part of the Waterloo Conservation Area looking east, and form part of the established wider setting of the conservation areas. Although the visibility of such buildings can reinforce the local network hierarchy, they dominate the skyline and have a neutral to negative impact on the significance of Roupell Street as a heritage asset.
211. The upper storeys of the proposals would be clearly visible in views along Roupell Street looking east. It would appear centrally in viewpoints, however would be flanked by Colombo House and Novotel on Blackfriars Road, both of which would be in closer proximity than the proposed development.
212. The impact of the proposed development would be experienced in the wider context and setting of the conservation areas however this would be from prominent viewpoints within the principal historic street of the Roupell Street conservation area. Taking into account the lack of change the immediate setting, and the scale of development in existence and permitted on Blackfriars Road, there would be some minor harm to the significance of the Roupell Street conservation area by development within the wider setting. This is mitigated in part by the distance of the development from the conservation area (over 200m to the edge) and the presence of similarly scaled modern buildings also in the views.
213. During the course of the application, officers requested amendments to the upper storeys of the development to help elongate and refine the top of the building in longer views. The purpose of this was to find an acceptably elegant solution to the issue of bulk of the upper floors, including in relation to the impact of the proposal on the views from within the Roupell Street Conservation Area and the setting of a portion of the Waterloo Conservation Area.
214. A solution, with a reduction of the upper storeys “shoulder” height leaving the impression of a slender “head” was found to lessen the impact on the skyline and the views out the of conservation area from Roupell Street. There would still be minor harm to the setting, however the impact overall is lessened with a more attractive building. In making a decision, the overall public benefit should be weighed in the balance against the minor harm to the significance of the building, as per para. 202 of the NPPF.

#### Conclusion on heritage

215. In conclusion, the proposal is likely to result in a low order of Less than Substantial harm to nearby assets as defined by the NPPF. In these instances

decision-makers are guided to avoid any harm and if harm is likely, consider in the balance the justification for that harm including the public benefits arising from the development. In this case it is considered there are considerable public benefits arising that can be considered in the balance including the substantial increase in affordable almshouse accommodation, the publicly accessible community garden, and the uplift in jobs including the provision of affordable workspace, arising from the redevelopment of the site. As a consequence, it is considered that the public benefits far outweigh any limited harm arising to the wider setting of the Roupell Street Conservation Area.

### Design Review Panel

216. The proposals were reviewed by the Council's DRP at the pre-application stage in July 2020 when the form of the building was less well developed. The Panel generally endorsed the proposal and expressed their confidence in the design team as they develop their design going forward. They highlighted the tension between architectural expression and massing and encourage a more robust stepping and pleating to give the building greater articulation. They also highlighted the specialist studies needed for a building of this scale.
217. As a result of the Design Review Panel's comments the design was amended to introduce a two storey reduction in height and subsequently a 2-storey step changes at the roof level and a deeper creased design at the junction of separate elements. The façade of the almshouse building was also updated as was the detailed design of the community garden.
218. The quality of the design will rely to a great degree on the choice of materials and the architectural detailing of the façade. Conditions requiring a mock-up of the commercial and almshouse building facades, comprehensive sample panels of all cladding materials, and large scale architectural details of the constructed building are proposed in order to ensure that the constructed design is high quality and the cladding materials are appropriate in context.

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

219. 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.
220. 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.

## Daylight and sunlight

221. A daylight and sunlight report was submitted to support the application. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
222. 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 dense urban environments and areas of modern high rise buildings, a higher degree of obstruction may be unavoidable to match the height and proportion of existing buildings.
223. Blackfriars Road has been identified as an area where tall buildings are appropriate and there are existing tall buildings in the close proximity such as at 240 Blackfriars Road, as well as the under-construction scheme at 18 – 20 Blackfriars Road to the immediate north west.
224. The BRE sets out the 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.
225. 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. The level of impact of loss of VSC is generally quantified as follows

Reduction in VSC	Level of effect
0-20%	Negligible
20-30%	Minor
30-40%	Moderate
40% +	Major

226. 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
227. The submitted daylight and sunlight assessment considers the impact of the proposed development on the following groups of neighbouring buildings:
228. Rochester Estate – located to the south of the site, comprising:
- 2 – 18 Nicholson Street
  - 1 – 14 Brinton Walk
  - 1 – 17 Rotherham Walk
229. Blackfriars Road east properties – located to the south of the site, comprising:

- 209 – 215 Blackfriars Road
- 203 – 208 Blackfriars Road

230. Blackfriars Road west properties – located to the west of the site, comprising:

- Ibis Novotel, 46 – 49 Blackfriars Road
- Colombo House, 41 – 45 Blackfriars Road

231. Blackfriars Road north properties, located to the north of the site, comprising:

- The Hoxton, 32 – 40 Blackfriars Road
- Conoco House
- Quadrant House
- 235 240 Blackfriars Road
- 240 Blackfriars Road

232. Chancel Street and Dolben Street properties – located to the east and south east of the site, comprising

233. • Railway arches 11 – 12 Chancel Street
- No.s 4 – 8 Chancel Street
  - 45 Dolben Street
  - 42 – 44 Dolben Street

234. East of the railway viaduct properties – located to the north east and east, comprising:

- 1 – 26 Friars Close
- 31 Bear Lane
- 36 Bear Lane
- 33 Bear Lane
- 31 Dolben Street

#### Daylight and Sunlight Testing Results

235. The BRE guidance advises that protection of neighbour's access to daylight and sunlight should be prioritised for residential uses given that non-residential uses have a less significant requirement for access to natural light. Of the affected neighbouring properties set out above, the following are both residential and comply with BRE standards:

- 235 Blackfriars Road
- 31 Dolben Street
- 45 Dolben Street
- 31 Bear Lane
- 33 Bear Lane

236. The following section of the report sets out results on the impact of the proposed development on residential neighbours where compliance with BRE guidance is not met.

## Vertical Sky Component Daylight Test Results

### Properties on the Rochester Estate

237. The Rochester Estate sits immediately to the south of the application site. It includes Nicholson Street, Brinton Walk and Rotherham Walk. The estate consists mainly of modern two-three storey modern terraced houses, each being dual aspect. Most feature similar layouts, with their primary living rooms facing south over their private gardens.

### 2-18 Nicholson Street

238. 2-18 Nicholson Street is a row of low rise houses directly to the south of the application site. Of the 94 windows tested, 46 are subject to a negligible impact. 48 are subject to a loss of daylight of 20% or greater of their existing VSC value. Of these, 7 are subject to a reduction in VSC values to a minor extent (i.e. up to 30%). 43 are subject to a moderate or major impact. The majority of these windows are north facing with aspect towards the site. As noted above, the properties themselves are dual-aspect however with living spaces overlooking private gardens on their south elevations, which remain unaffected by the proposed development.

Reduction in VSC	Windows affected
0-20%	46
21-30%	5
31-40%	1
41% +	42

### 1 – 14 Brinton Walk

239. These are similarly two-three storey houses located to the south of and running parallel to the Nicholson Street properties noted above. Of the 151 windows tested, the majority are subject to a negligible impact while 62 are subject to a loss of access to daylight of 20% their existing VSC value or greater. Of these, 22 are subject to a reduction in VSC values to a minor extent (i.e. up to 30%), while 40 are subject to a moderate or major impact.

Reduction in VSC	Windows affected
0-20%	89
21-30%	22
31-40%	14
41% +	26

### 1 – 17 Rotherham Walk

240. These are two-three storey houses located to the south of and running parallel to Brinton Walk. Of the 182 windows tested, the majority are subject to a negligible impact while 36 are subject to a loss of daylight of 20% or greater their

existing VSC value. Of these, 27 are subject to a reduction in VSC values to a minor extent (i.e. up to 30%), while 9 are subject to a moderate/major level of reduction.

Reduction in VSC	Windows affected
0-20%	146
21-30%	27
31-40%	2
41% +	7

#### 45 Dolben Street

241. This is a two storey Victorian building located to the south east of the site. Of the 13 windows tested, one is subject to a loss of daylight of more than 20% their existing VSC value, however this is only by a marginal extent (21%).

#### 4 Chancel Street

242. This is a four storey Victorian building located to the immediate south east of the site. Of the 18 windows tested, 14 are subject to a loss of daylight of 20% or greater of their existing VSC value, however 13 of these are subject only to a minor impact (i.e. up to 30% reduction in VSC value).

Reduction in VSC	Windows affected
0-20%	4
21-30%	13
31-40%	1
41% +	0

#### 31 Friars Close

243. This is a four storey council housing block arranged in a half-perimeter block format, located to the north east on the other side of the nearby railway viaduct. The rear elevation of the block, partially facing in the direction of the application site, hosts deck access to flats on floors 1, 2 and 3. Of the 147 windows tested, the majority are subject to a negligible impact. 43 are subject to a loss of daylight of 20% or greater of their existing VSC value. 11 windows are subject to a moderate impact, while 28 are subject to a major impact. The majority of windows tested and impacted are located on the rear of the block where the deck access to flats across ground – third floors is accommodated and which overhang windows on the floor below.

Reduction in VSC	Windows affected
0-20%	104
21-30%	4
31-40%	11
41% +	28

244. Under BRE guidance, such an arrangement can be subject to further testing



confirm the extent to which the overhang of the affected building impacts access to daylight, as opposed to a proposed development, and factor that into the results. As part of the submitted daylight and sunlight assessment, this exercise was undertaken on the 31 Friars Close block which confirmed that, when discounting the impact of the overhanging deck access on the block's windows' access to daylight, the proposed development would have a negligible impact, with all windows meeting BRE guidelines.

### Quadrant House

245. Quadrant House is an 8 storey post war housing block located to the north of the application site. The primary elevation affected by the proposed development is south facing and hosts bedrooms and living rooms. Of the 64 windows tested, 10 would be subject to a negligible impact, while 54 are subject to a loss of daylight of 20% or greater of their existing VSC value. Of these, 3 are subject to a reduction in VSC values to a minor extent (i.e. up to 30%), while 3 would be subject to a moderate impact (i.e. between a 31 – 40% reduction on the existing values). The remaining 48 would be subject to a major (40+) reduction in VSC values as a result of the proposed development.

Reduction in VSC	Windows affected
0-20%	10
21-30%	3
31-40%	3
41% +	48

246. As set out above, VSC measures the amount of daylight reaching a particular point on a window. It is not able to not take into account other factors which may provide a more comprehensive picture of the impact of a proposed development, as it may be experienced for the occupiers of a particular room behind the affected windows.
247. For example, of the 64 windows noted above, 32 comprise 16 pairs located on the corners of the building. One of each pair is located on the southern elevation facing the site, being double sized relative to the partner window, which itself comprises a large side return element on the eastern and western elevations of the building. Together each pair comprises a large wrap-around window for each of the rooms, which are understood to be living rooms.
248. It is not considered that the reductions noted in VSC here would be as significant as implied by the VSC tests, which has its technical limitations in providing a comprehensive picture of what the experience of the reductions may be for neighbouring occupiers in circumstances such as these.

### VSC summary

249. Of the group of neighbouring residential buildings discussed above which hosted a window which did not meet BRE guidelines, a total of 670 windows were tested. Of these, the overwhelming majority, at 412 windows, complied with BRE standards, and would see a negligible impact incurred as a result. 258 windows



were subject to a loss of daylight beyond the maximum 20% BRE recommendation, with 151 of these subject a major (41%+) loss:

Reduction in VSC	Windows affected
0-20%	412
21-30%	75
31-40%	32
41% +	151

250. The low-rise nature of the existing buildings on the application site means currently neighbours are afforded an unusually high level of access to daylight for a central London context. This in turn means any form of modest increase in development scale is likely to have a proportionally significant impact on VSC values to neighbouring windows. This provides the explanation for the extent of a relatively high level of instances of a major loss of daylight noted above.

### Daylight distribution

251. Daylight distribution (DD) testing (also referred to as the 'No Sky Line' test) was undertaken where the layouts of the rooms of potentially affected neighbouring windows were known. Daylight distribution measures the proportion of the area of a room which has access to daylight (via a direct line of sight to the sky) at the working plane level (i.e. 0.8m high).
252. Dimensions of potentially affected rooms can have a significant impact on daylight distribution results, therefore it is not advisable to assume or estimate these values for a more robust assessment. In this case, only a small number of rooms were tested for Daylight Distribution, where internal layouts were known. BRE guidance states that access to daylight by this measure may be adversely affected if there is a 20% reduction in the daylight distribution value.
253. Of the residential properties tested for daylight distribution, 4 habitable rooms in two Nicholson Street addresses were subject to losses in DD values greater than 20%. Two of these were bedrooms at first floor level, being subject to a loss of 40% and 80% respectively, while the other two were kitchen/dining rooms, subject to reductions of 70% and 43%.
254. Due to the application site's low rise nature at approximately two storeys (at the point opposite where these neighbouring properties are located), these neighbouring properties are currently subject to unusually high existing DD values, typically between 80 – 90% and in some instances 100%. On this basis it would be expected that any modest sized development would be likely to have a proportionally substantial impact on the relevant neighbouring properties access to daylight in particular instances such as those noted here.

### Sunlight

255. BRE guidance states that sunlight should be quantified in terms of both Annual Probable Sunlight Hours (APSH) alongside the equivalent values for the winter

period (i.e. September to March) for windows that are situated within 90 degrees due south on a neighbouring building where they have the potential to be impacted by a proposed development.

256. BRE guidance states that a proposal may have an adverse impact on a neighbouring window's access to sunlight where the centre of the window:
- receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March *and*
  - receives less than 0.8 times its former sunlight hours during either period *and*
  - has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.
257. Where windows are stated as not meeting BRE guidance in the following sections, it is on this basis. Of a total of 487 residential windows tested, 33 did not meet BRE guidelines. Further details on where the instances of non-compliance are set out below.

### 31 Friars Close

258. 25 of the 33 above noted instances of non-compliance with the BRE guidance set out in the submitted Daylight and Sunlight Assessment are found to be at 31 Friars Close. However, as with the VSC tests, alternative testing without the deck-access overhangs, as permitted by the BRE guidance, confirms that the impact of the proposed development is negligible when excluding these from the assessment and in this instance all windows comply with BRE standards. The impact of the proposed development is therefore considered to be acceptable.

### Quadrant House

259. 8 windows tested fail the BRE sunlight tests, however in each instance these are secondary side returns partnered with a much larger window to the same room which complies with the BRE standards and would not therefore be noticeable. The impact of the proposed development is therefore considered to be acceptable.

### Overshadowing of amenity spaces

260. The effects of the development on overshadowing have been considered for the courtyard of 31 Friars Close to the north east and the private rear gardens of the Rochester Estate properties (comprising 2 - 18 Nicholson Street, 1 – 14 Brinton Walk and 3 – 17 Rotherham Walk). The results of the overshadowing testing confirmed that all spaces would be subject to a level of access to direct sunlight in compliance with BRE guidance with the proposed development in situ.

### Conclusion on daylight, sunlight and overshadowing

261. The proposal would incur substantial reductions in access to daylight for a

minority number of residential neighbour's windows noted above. Whilst the overall proportion of rooms affected is small, for those living closest to the site the impacts are significant. This must be acknowledged as a negative aspect of the overall development. There are however a number of mitigating factors as set out above, particularly noting the currently high levels of daylight received and therefore the relatively significant impact from a higher building.

262. The BRE advises that its tests are to be used as guidance, and must be used and applied flexibly in response to the context of the site. In dense urban environments, where larger scale buildings are expected to be located, the numeric targets in the BRE must be viewed with this in mind. The proposal is not considered to have a significant impact on neighbour's access to sunlight, taking into account mitigating factors noted above, and would not incur an unacceptable level of overshadowing. Whilst noting and giving weight to the harm to neighbour amenity, it is considered, on balance, that the harm would not justify refusing planning permission, when assessed in the context of the area and the wider merits of the scheme.

### Privacy and overlooking

263. The corner of the proposal's southern and eastern elevation would be located approximately 32m away from the nearest neighbour at No. 4 Chancel Street, while the southern elevation of the proposal would be approximately 18m away from the nearest Nicholson Street neighbours. The proposal's northern elevation would be approximately 30m from the facing southern elevation of Quadrant House located to the north.
264. The 2015 Technical Update to the Residential Design Standards SPD requires a minimum of 12m separation distances for across-street arrangements such as these. Therefore there is considered to be more than adequate separation distance between the proposal and potentially affected residential neighbours that there would not be any harm to neighbouring occupier's privacy.
265. An increase in incidental overlooking is likely to be incurred from both the residential and office occupiers to abovementioned neighbours, including into the private gardens of the Rochester Estate properties. This would be incurred by virtue of the tall nature of the proposal. However this level and type of overlooking would not cause undue harm to amenity given both the adequate separation distances noted above, in addition to the built up central London context of the site, for which a minor degree of incidental overlooking is to be expected.

### Sense of enclosure and outlook

266. Given the scale of the proposal, the building would incur a sense of enclosure and reduce outlook for the above mentioned neighbouring residential occupiers who are located closest to the site. However, in addition to the adequate separation distances noted above mitigating this to an extent, several factors can be taken into account which further help mitigate the impact of the proposal in this regard:

Quadrant House

267. Occupiers of Quadrant House to the north are afforded large, wrap around windows to their living rooms on the corner of each side of the building. In addition to mitigating the impact of the proposal in daylight and sunlight terms, these also provide wider aspect to the east and west in addition to the primary aspect to the south. Considered in conjunction with currently open-air car park to the immediate south of these neighbours (and to the north of the application site) in addition to the 30m separation distance, the proposal is not considered to incur an unacceptable harm to outlook or incur an undue sense of enclosure on these neighbouring occupiers.

No. 4 Chancel Street

268. The properties to the east along Chancel Street, including the residential No. 4 located to the south east of the site, may incur a degree of sense of enclosure and reduced outlook as a result of the proposal. However, given the property's primary outlook and aspect is directly east facing the low-rise Rochester Estate properties, it is not considered that this would be to an unacceptable extent.
269. Any degree of harm to outlook or increase in sense of enclosure is considered to be adequately mitigated in virtue of the provision of the landscaped community garden and public space which would be planted with trees and provide a form of screening to the large building behind this. In addition, the set-back positioning of the proposal away from Chancel Street and into the west of the site plan would help to reduce the proposal's impact. On this basis, harm to the sense of enclosure and outlook is not considered to be unacceptable for neighbouring occupiers of Chancel Street properties.

Nicholson Street

270. Nicholson Street properties are considered to have the greatest potential to be subject to an increase in a sense of enclosure and reduced outlook as a result of the proposal. With the shortest separation distance of the above noted neighbours and facing north across to the site, the Nicholson Street properties, particularly the western-most houses numbered 2 – 10 are also subject to a degree of a sense of enclosure as existing from the rear elevation of the 6 storey Soap Factory office building located to the immediate west on Blackfriars Road.
271. The properties do however benefit from outlook and an open aspect both to the east, where lower rise buildings are located along Chancel Street, in addition to the south, where further low rise terraced homes of the remainder of the Rochester Estate are located. All the properties of the estate, including those on Nicholson Street, benefit from primary living spaces situated to the south of their floor plan which open onto their private gardens.
272. The change in the level of outlook and sense of enclosure from their perspective to the north would be substantial as a result of the proposal. However, this is partly borne of the existing low rise nature of the site, where the properties benefit from an unusually low-rise surrounding built environment for a central London context. Given these circumstance, the proposal is not considered to reduce outlook or incur a sense of enclosure to an unacceptable extent, and in this

regard the impact of the proposal is considered acceptable.

### Noise, vibration and odour

273. A Noise Impact Assessment was submitted to support the application. This details measures for mitigating noise and disturbance from plant (power, heating and cooling machinery), and the commercial uses within the proposed building. The Council's Environmental Protection Team has reviewed the Noise Impact Assessment and recommended conditions regarding:
- submission of validation tests confirming plant noise levels
  - limiting the use of the commercial office's roof terraces to 22:00
  - submission of a scheme of sound insulation for the public house
  - restricting the operating hours of the public house to 08:00 – 00:00 daily and
  - restricting deliveries and servicing collection times for the non-residential elements of the proposal to between 08:00 – 20:00 Monday to Saturday and 10:00 – 16:00 on Sundays and Bank Holidays
  - Details of extraction, ventilation and flue system for the public house kitchen
274. Submission of a construction logistics plan and construction environmental management plan will be secured by S106 obligation and condition respectively. This will ensure the council will be able to adequately manage and approve mitigation strategies for minimising disturbance and potential harm to amenity to neighbouring occupiers and members of the public during the construction phase of the development.

### **Transport and highways**

275. 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.
276. The London Plan 2021 seeks to maximise sustainable forms of transport through the integration of land use and transport. Sustainable forms of transport include, walking, cycling and public transport and the London Plan aims to have these forms of transport make up 80% of all journeys by 2041.
277. 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

278. The site is bounded by a public pedestrian passage way to the north, with Conoco and Quadrant Houses and the associated ancillary car park beyond; Chancel Street, the railway viaduct and associated properties between to the east; Nicholson Street and the Rochester Estate to the south, and Blackfriars Road and associated commercial buildings to the west. Blackfriars Road forms part of the Transport for London Road Network (TLRN).
279. The nearest station is Southwark Underground approximately 150m to the south. This is served by the Jubilee line. Approximately 300m to the north is Blackfriars Station, served by the Thameslink rail line. Bus stops for routes 40, 45, 63 and 381 and the night bus equivalents are accessible in close proximity to the site on Blackfriars Road and Stamford Street.
280. The site has a Public Transport Access Level (PTAL) of 6b, on a scale of 0 to 6b where 6b is the most accessible. The site is also served by the Mayor's cycle hire scheme. The nearest Cycle Hire docking station is located opposite the site on the western side of Blackfriars Road which has capacity for 42 cycles. There are a further two docking stations within 200m radius of the site, and a further three within 400m of the site.
281. Blackfriars Road hosts Cycle Superhighway 6 to the immediate west of the site, providing dedicated segregated cycle lanes and associated infrastructure for cross-London journeys between Elephant and Castle and Central London. Nicholson Street to the south of the site forms part of TfL's 'quietway' network of cycle routes.

### Site layout

282. The proposed site layout would be simple and rational given the approach of providing a single building. The proposal would improve the street-level environment through provision of new and upgrading of the existing public realm, new active frontages and access points and the community garden. Connectivity would be improved by re-providing the existing passageway to the north of the site in the form of a landscaped and paved area with better passive surveillance, as well as accommodating public house seating.
283. The entire building would be serviced from Nicholson Street, given the lack of vehicular access from the north, and the desire to limit vehicle crossovers from Blackfriars Road. A servicing bay for large vehicles would be provided on Nicholson Street, while more frequent servicing by smaller vehicles would be accommodated on site. A disabled parking bay would be provided on Nicholson Street, with a further two spaces secured within the existing off-site parking area within off-street car park ancillary to Conoco and Quadrant Houses to the north (which is within the applicants ownership).

### Trip generation

284. The Council's transport officer and TFL have reviewed the proposed development in terms of trip generation and impacts on the local transport network. This has also been considered by Transport for London, who raised no

objections to the proposal in terms of impact on trip generation or transport infrastructure capacity. As part of the council's assessment, the TRICS database has been reviewed, looking at comparable developments and travel surveys.

285. The commercial office element of the development would generate an additional 43 and 33 two-way vehicular movements in the morning and evening peak hours respectively. The residential almshouses and reprovided public house would have a negligible impact on two-way vehicular movements in the morning or evening peak hours. These levels of vehicular traffic would not have any noticeable adverse impact on the prevailing vehicle movements on the adjoining roads.
286. The applicant has proposed several travel plan initiatives encompassing the provision of cycling facilities (including showers, lockers and changing rooms) and travel information and the appointment of a travel plan co-ordinator who would promote sustainable travel consisting of organising and publicising events such as 'Walk/cycle to work week', Bikeability training and Dr. Bike maintenance workshops for the development. Submission of a travel plan and the commitments therein will be secured by a S106 obligation.

### Servicing and deliveries

287. The servicing arrangements for this development would involve servicing primarily from an internal loading bay accessed from Nicholson Street. Larger vehicles, such as those delivering barrels to the public house, would be accommodated within an on-street loading bay on Nicholson Street. The servicing area would be shared between the public house and commercial office. The application was amended following comments from officers about servicing on Nicholson Street, and an internal loading bay was created to accommodate the smaller and more regular delivery vehicles.
288. A delivery servicing plan, including requirements for monitoring against targets with a bond payment where not met, will be secured by S106 obligation. As mentioned above, times for servicing and collection vehicles will be restricted by condition for the non-residential elements of the proposal to between 08:00 – 20:00 Monday to Saturday and 10:00 – 16:00 on Sundays and Bank Holidays.

### Refuse storage arrangements

289. Dedicated basement level refuse stores would be provided separately for the commercial and residential elements of the proposal. These will be sufficiently sized with the commercial aspect supplemented by a compactor facility. The council's waste management team provided advice on the use and management of compacting facilities and these are recommended to be appended to any grant of planning permission as an informative. The ground floor level would accommodate a holding area for waste bins on collection days.

## Car parking

290. 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, while a maximum of 0.4 spaces are permitted for residential units within the Central Activities Zone.
291. The development would in general be car free apart from 3 accessible car parking spaces. One of these would be on-street located on Nicholson Street while two would be located within the existing off-street car park located to the immediate north of the site. One of these would be for use by almshouse occupiers while the other for the commercial office occupiers. The disabled parking bays will be secured by legal obligation within the S106 and will be required to be fitted with electric vehicle charging facilities.
292. Conditions will be added in order to prevent occupiers of the proposed development (apart from Blue Badge holders) from obtaining parking permits for any of the Southwark Controlled Parking Zones. Nicholson Street is currently host to 5 on-street parking bays which would be able to continue to be accommodated following completion of the development.

## Cycle parking and cycling facilities

### Long stay spaces and facilities

293. The development would provide 535 long stay cycle parking spaces located within the basement level cycle stores. The stores have been specified to TfL's London Cycle Design Standards. The office and public house store would accommodate 455 and 4 spaces respectively. 10% of the office spaces would be provided in the form of Sheffield stands, of which half would be able to accommodate specialist cycles such as tricycles and cargo bikes. This is in line with London Plan policy.
294. There would be a surplus of 27 spaces against London Plan requirements which would be available as the short stay spaces for visitors to the office to use. Normally these would be required to be provided within the public realm, however in this instance given the demand on the public realm for most of the site, and where not, the limitations of space, basement level provision is considered acceptable. TfL did not object to this arrangement. The basement level cycle parking would be supplemented by a bike maintenance station and shower and locker facilities.
295. The almshouses block would be afforded its own dedicated basement level cycle store, comprising 76 spaces. This would be below the level required in the London Plan at 1.5 spaces per one bedroom unit, however given these units are being provided specifically for older people, and expected to be used predominately by a single person, (generating a need for 62 spaces) the level is acceptable



296. The remaining 14 spaces would exceed the requirements for the almshouse block's 420sqm of office space, the care takers flat, and any almshouse staff requirement. 14 of the spaces (18%) would be provided in the form of Sheffield stands. A further 8 spaces (11%) would be as Sheffield stands spaced to able to accommodate larger specialist accessible cycles. This combined 29% of accessible cycle parking exceeds the 20% requirement for residential use which is supported. The basement level cycle store would also be provide space for mobility scooters.

### Short stay spaces

297. In addition to the basement level short stay spaces provided for the offices noted above, 33 short stay visitor cycle spaces would be provided within the public realm. The majority of these would be located along the northern route and would be overlooked by the public house. Two sets of Sheffield stands would also be provided on the Blackfriars Road and Nicholson Street frontages. These would serve patrons of the pub, or short stay visitors to the offices.

### Conclusions on transport issues

298. The proposed development comprises a logical and well considered layout that positively responds to site constraints, neighbouring context and opportunities to contribute to and improve public realm. The proposal would not have any significant impact on local transport infrastructure in terms of private vehicle trips or public transport capacity. The proposal would be car free and provide cycle parking in accordance with London Plan policy.

## **Environmental matters**

### Construction impacts and management

299. An outline Construction Logistics Plan (CLP) was submitted to support the application. This proposes a strategy for managing construction traffic and the site with a view to reducing the impact on the local highway network, neighbour amenity and members of the public safety.
300. It is proposed that construction vehicles would access the site from Nicholson Street by arriving from the west via Blackfriars Road. They would then either enter the Site or stop on-street within a dedicated loading area. Vehicles will depart to the east onto Chancel Street before travelling north to Burrell Street where they would head west and return to Blackfriars Road.
301. Vehicle movements would be staggered to reduce the potential for congestion at the site. This will ensure that materials are pre-booked in a timely manner on a "just in time" basis. A detailed traffic management plan will be established and a Full time banksmen / traffic marshals would be stationed on site and would be responsible for managing safe access and egress of all vehicular traffic.
302. Nicholson Street would be subject to temporary parking bay removals to facilitate access to the site and loading for construction vehicles. Signage will be provided

to alert pedestrians, cyclists and motorists of the construction works while temporary barriers and stop/go boards will be utilised where appropriate. Contractors will be required to adopt best practice measures with regard to air and water site pollution including dampened down surfaces, using covers and drop heights minimised, vehicle wash down.

303. A number of other best practice measures are set out in the CLP however it is recommended this outline be revised in full and submitted to the council for approval. This would be secured by S106 obligation. For the purposes of managing and mitigating environmental impacts of the construction period, including on air quality and dust and emissions, It is recommended a construction environmental management plan be secured by condition also.

### Ecology and biodiversity

304. The application site presently has very low ecological value. The Council's Ecologist has reviewed the application and raises no objection. There is an opportunity, as part of the redevelopment, to provide ecological enhancement and the Council's Ecologist has recommended conditions relating to planting species, the installation of bird boxes and the provision of an Ecological Management Plan. Conditions would be imposed to secure the Swift bricks and biodiverse roofs whilst the Ecological Management Plan would be secured as part of the S106 Agreement.

### Archaeology

305. The site is not located within an Archaeological Priority Zone established by adopted policy. It is however located within the proposed 'North Southwark and Roman Roads' Archaeological Priority Area set out in the draft New Southwark Plan. The underlying archaeology relates to the margins of the tidal mudflats of the 'Southwark Mainland' and the south island of roman Southwark. Prehistoric material was previously found to the north of this site, at 240 Blackfriars Road.
306. This material has the potential to be present on the two areas of tidal margin included within this development site. Other sites within Blackfriars Road have revealed some Roman exploitation of the land and island margins, medieval and post-medieval land management, agriculture and settlement. On this basis, conditions regarding archaeological evaluation, mitigation, reporting and basement level foundation design are recommended to be appended to any grant of planning permission.

### Ground conditions and contamination

307. A 'Phase 1' land contamination assessment was submitted to support the application. The assessment concluded a low-to-medium risk of contaminants present in the ground under the site and that a further Phase 2 intrusive investigation should be undertaken in order to determine this and the appropriate mitigation and remediation potentially necessary. Conditions requiring submission and approval of this Phase 2 assessment and mitigation and

remediation strategy are proposed to be secured by condition.

### Fire safety

308. The applicant has submitted a Fire Safety Strategy as part of the application in response to the requirements of Policy D12 – Fire Safety of the London Plan 2021. This policy requires developments to achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside space for appliances, incorporate features to reduce risk to life and injury in the event of a fire; be designed and constructed in order to minimise the spread of a fire; and provide suitable and convenient means of escape for all building users.
309. The policy requires that the Fire Strategy statement should include information in terms of the building's construction, means of escape for all users, fire suppression features and measures that would reduce risk to life and injury. The strategy should also include details of how access would be provided for fire service personnel and equipment as well as provision for appliances to gain access to the building.
310. The submitted Fire Statement has been prepared in accordance with Policy D12 of the London Plan. The Fire Statement sets out the risk profile for the building; confirms that there would be an automatic sprinkler system installed; provides information on length of evacuation routes; provides details of refuge areas; provides fire alarm category information; and also confirms that fire risk areas such as kitchens, engineering services, stores and service risers will be located within fire compartments.
311. The office stair cores will be designed as firefighting shafts, each including a firefighting lift. The almshouse element will also be provided with a fire fighting core including a firefighting lift, wet fire mains connection, and smoke vented lobby/corridor protection on each floor. Overall the Fire Strategy is considered to comply with the requirements of Policy D12 of the London Plan 2021.

### Flood risk

312. The application site is located within Flood Risk Zone 3. The application submission was supported with a Flood Risk Assessment, Basement Impact Assessment and Outline Drainage Strategy. The main source of flood risk in Southwark is as a result of tidal activity within the River Thames which lies approximately 350m to the north of the site. It should be noted that the site would benefit from protection by the Thames Barrier up to the 1 in 1000 year event.
313. The Environment Agency reviewed and provided comments on the submitted FRA as a statutory consultee. They did not raise any objections to the proposed development on the basis of flood risk. Submission of a Flood Warning Evacuation Plan is recommended to be secured by condition.

### Sustainable urban drainage

314. The sustainable urban drainage (SUDS) proposals for the site includes a combination of a surface water attenuation system on site using tree pits, green roofs and soft landscaping for rainwater harvesting, and permeable paving and an underground attenuation tank for controlled discharge. The proposed discharge rate would amount to the equivalent greenfield rate of 2l/s in accordance with policy. The strategy would provide sufficient storage for a 1 in 100 year storm event as well as an additional 40% climate change capacity. Full details of the proposed drainage strategy are recommended to be secured by condition.

### Air quality

315. An air quality assessment (AQA) was submitted as to support the application. The site is located within an Air Quality Management Area. The submitted assessment considered:
- The impacts of the demolition and construction phase of the proposed development on dust soiling and concentrations of PM10 at existing sensitive receptors during the construction period;
  - The impact of construction of the proposed development from construction traffic; and
  - Whether or not the proposed development is 'air quality neutral';
316. The AQA therefore considers the impact of the construction and operational phases of the development on air quality. The key considerations during the demolition and construction phase of the development have been dust emissions as well as emissions from heavy goods vehicles. The impacts considered as part of the operational phase of the development (the building once completed) include emissions from road traffic generated by the development and emissions from the stand by emergency generator.
317. The demolition and construction phase of a development is temporary and short term. It is acknowledged that there would be an increase in the number of heavy duty vehicles on the roads as a result of the demolition and construction phase of the development. The AQA has demonstrated that this increase would have a negligible impact on air quality at such sensitive receptors as neighbouring residential occupiers. The development would not result in any significant dust effects with mitigation measures in place. Submission of details of a mitigation and a strategy for minimising dust and emissions from the construction period will be secured through a condition for a Construction Environmental Management Plan.
318. Once the development is completed and occupied it would become operational. Road traffic emissions associated with the operational phase of the development are not considered to have any significant effect on local air quality and would not lead to the national air quality objectives being exceeded. The heating, cooling and hot water would be provided by air source heat pumps and PV panels.

319. There would be an emergency stand by diesel generator and this would be operational for a maximum of 4.5 hours per year for testing and maintenance purposes and discharge from a flue located above the 90m roof level and at least 3m above any area where there is general access by occupiers of the buildings. The operational development would be air quality neutral in accordance with London Plan policy.

### Wind

320. Wind microclimate has been considered within the submitted Wind and Microclimate Assessment. The assessment seeks to understand whether any undesirable wind conditions would be created on site or within the surrounding area as a result of the proposed development. It considers if the resultant wind speed changes would be suitable for the intended use of specific locations around the site in terms of comfort and safety.
321. The assessment adopts the Lawson Comfort Criteria which are the well established guidelines that have been in use for over 30 years. The Lawson Criteria establishes four pedestrian activities (comfort categories) taking into account that less active pursuits require more benign wind conditions. The four categories include: sitting, standing, strolling and walking. Testing is undertaken for both summer (i.e. calmest) and winter (i.e. windiest) scenarios.
322. Areas within and around the site at ground level, including areas where outdoor seating is proposed have been considered in addition to the terraces of the proposed building itself. Areas around other surrounding buildings, nearby bus stops, pedestrian thoroughfares and crossing have also been tested.
323. As existing, wind conditions on the site and the surrounding area are considered suitable for sitting use during both the windiest season and during the summer. At ground floor level the proposed development would incur minor affects in comfort level along the southern boundary of the site within Nicholson Street as well as to the immediate east of the proposed building where the community garden would be located.
324. Here the areas would be subject to comfort levels changing from being appropriate from sitting to standing, and in one small portion of the corner through-route of the community garden space, strolling, during the windiest season. For summer, the areas would largely maintain their existing sitting comfort level, with the exception of the corner through-route of the community garden where the level would change to being appropriate for standing use.
325. The area hosting the outdoor public house seating would retain sitting-category comfort levels. The proposed roof terraces would accommodate sitting and standing comfort levels across summer and sitting, standing and strolling levels across winter. For the almshouse roof terrace amenity space the small area subject to a strolling category during winter would be mitigated through the use of sheltering planting to improve comfort levels. Overall the conditions are considered appropriate for the intended uses and the impact of the proposed development is therefore considered to be negligible.

326. A Post Construction Wind Mitigation Review will be required as part of the S106 agreement in order to ensure the impacts of the proposal match those anticipated.

### Light pollution

327. Consideration to light pollution and the proposed lighting strategy was given in the submitted lighting assessment. The strategy sets out the intention of providing suitable lighting for all aspects of the proposal with a view to both minimising light pollution, including to areas of soft landscaping on the proposed roof terraces which have the potential to provide habitat value, and enhancing the legibility and safety of site's public realm. A condition requiring submission of full technical details of lighting to be implemented for approval by the council is recommended to be appended to any grant of permission.

### Climate change

328. Climate change has the potential to alter and affect the current environment and is likely to result in changes to average air temperatures, increased yearly rainfall and sea level rise. It is also considered that cloud cover could slightly decrease. All development projects create greenhouse gas emissions that contribute to climate change and have the potential to increase air temperature and therefore lead to significant environmental effects.
329. The proposal's design has incorporated a number of measures to minimise the creation of greenhouse gases including the type of materials being used, the proposed approach to the management of the construction site and period, the use of a building management system during the operational phase and the use of low carbon technologies. It is anticipated that greenhouse gas emissions from transport and servicing will reduce throughout the development lifetime with decarbonising of the national grid as well as the improved use of electric and low emission vehicles.

### Energy and sustainability

330. Policy SI2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. Policy SI3 requires consideration of decentralised energy networks, Policy SI4 deals with managing heat risk and Policy SI5 is concerned with protecting and conserving water resources and associated infrastructure.
331. Policy 13 of the Core Strategy and Saved Policy 3.4 of the Southwark Plan 2007 sets out the borough approach to ensuring that new developments tackle climate change. The approach is generally consistent with London Plan Policies but also requires new commercial developments to meet BREEAM 'Excellent'

### Energy and carbon emission reduction

332. As per the carbon emission reduction policies of the London Plan 2021 and local development framework, both the residential and non-residential elements of the proposal would be expected to achieve zero carbon (with offset permitted once a minimum on-site 35% carbon reduction against part L of the Building Regulations 2013 has been achieved).
333. The Council's carbon offset cost is £95 for every tonne of carbon dioxide emitted per year over a period of 30 years. This is the equivalent of £2,850 per tonne of annual residual carbon dioxide emissions.
334. An Energy Assessment based on the Mayor's hierarchy was submitted to support the application, setting out how the targets for carbon dioxide emissions reduction are to be met. A combination of 'Lean' and 'Green' (but no 'Clean') measures have been employed in an attempt to achieve the reduction in line with the GLA guidance on preparing energy statements, the Southwark Core Strategy 2011 and the Southwark Sustainable Design and Construction SPD.

#### Be Lean

335. A range of passive and active measures are proposed, including:
- high thermal envelope performance to reduce uncontrolled heat transfer through the building fabric;
  - optimisation of glazing to provide a balance between minimising heat gain and maximising natural daylight (to reduce lighting energy);
  - openable windows to prevent overheating in summer and allow for natural ventilation of the residential units;
  - minimising heat loss from heating and hot water systems;
336. The active measures include:
- communal heating system to the building;
  - high efficiency ventilation systems including Mechanical Ventilation with Heat Recovery (MVHR) to residential apartments and non-residential elements;
  - low energy and high efficacy lighting systems, fittings and controls;
  - controls systems to monitor and operate the plant and equipment as efficiently as possible;
337. The reduction in carbon emissions achieved through these 'demand reduction' measures will reach 13% (against a 10% policy requirement) for the residential element and 16% (against a 15% policy requirement) for the non-residential element. This therefore complies with the London Plan.

#### Be Clean

338. The applicant is proposing a communal heat network supplied by a centralised on-site energy centre to serve both residential and non-residential elements of the proposal.
339. There are no nearby district heating networks within 1km of the site that the development could connect to. The location and technical specification of the proposed plant room would ensure future connection to any decentralised heat

network developed in the area would be feasible. This will be secured by a planning obligation.

340. An on-site CHP system is not proposed due to the scale of the proposal falling below the GLA's advised threshold of a minimum heat load equivalent to 500 dwellings in order to achieve the appropriate efficiencies. As such, no carbon savings are reported from the 'Be Clean' stage of the energy hierarchy.

### Be Green

341. With respect to the "Be Green" tier of the hierarchy, the applicant has proposed:
- Centralised communal heat pump network comprising air source heat pumps and water-source heat pumps for hot water top-up
  - Rooftop mounted photovoltaic array for electricity generation, with roof coverage optimised to provide approximately 205sqm of PV surface area
342. With the proposed energy strategy, carbon emissions would be reduced by a total 50% on the baseline Part L 2013 Building Regulations. This significantly exceeds the minimum 35% on-site requirement and is a positive aspect of the scheme. Through 'Be Lean' and 'Be Green' measures, the applicant has demonstrated that opportunities for reduction in energy demand and utilising renewable energy generation on site have been maximised.

### Be Seen

343. 'Be Seen' is the newest addition to the GLA's energy hierarchy, introduced in the London Plan 2021. It requires developments to predict, monitor, verify and improve their energy performance during actual operation.
344. In order to meet the requirements of Be Seen under Policy SI 2, the development is required to monitor and report on energy performance, such as through displaying a Display Energy Certificate (DEC) and reporting to the Mayor for at least five years.
345. As part of meeting the 'Be Seen' policy requirements, the applicant has committed to:
- conducting a predicted operational energy use analysis during the detailed design stage (and then measuring actual operational energy use once the development is in use, benchmarked against the in-design analysis);
  - using fully metered electricity and water supplies; and
  - using sub-meters to measure electricity, heating and cooling energy use, which would feedback energy consumption to each user group/ functional space/tenancy within the development.
346. This approach will ensure energy efficiency is delivered in reality, and is identified as best practice within GLA 'Be Seen' draft guidance. Requirements for complying with the 'be seen' part of the Mayor's policy, including timely submission of monitoring data to the GLA, will be secured by planning obligation.

### Carbon offset payment



347. The proposal would achieve a site-wide carbon emissions saving on 2013 Part L Building Regulations of 50%. This equates to 227 tonnes of CO<sub>2</sub> per year, against the total baseline 451 tonnes CO<sub>2</sub> emissions estimated through the Part L of the 2013 Building Regulations. Therefore, 224 tonnes of CO<sub>2</sub> carbon emissions are required to be off-set by payment in lieu to achieve the equivalent carbon zero standard.
348. This would result in an offset payment of £638,400 on the basis of £95 per tonne of carbon per year over a period of 30 years. This will be secured by S106 obligation. To ensure the anticipated on-site savings are realised, the Section 106 Agreement will include two obligations, one requiring the development to be constructed in accordance with the Energy Assessment, and the other verifying the delivery of the carbon savings through a post-installation review process.

*Whole life cycle and carbon capture*

349. London Plan Policy SI2 requires a calculation of whole life cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment. This captures a development's unregulated emissions, its embodied emissions and the carbon impact of mid-life maintenance and end-of-life dismantling. For the purposes of the WLC assessments, the emissions are expressed in kg of CO<sub>2</sub> per sqm GIA of the development.
350. The applicant submitted a Whole Life Carbon Cycle assessment to support the application demonstrating that, under the methodology set out in draft GLA guidance, the development would incur 256kg of carbon emissions per sqm of GIA over its lifecycle based on the current level of carbon intensity of the national grid. It is anticipated this would be reduced to 234kg of carbon emissions per sqm in 60 year's time as the national grid decarbonises and becomes more efficient.
351. The assessment confirms the majority of the carbon emissions can be attributed to the processing and production of the construction materials to be used, particularly the large quantities of steel and concrete in substructure elements, the steel frame, and aluminium and glass for the façade and curtain walling systems. The assessment provides recommendations as to how emissions can be reduced further, including through maximising use of recycled materials and identifying product specification in fit-out.
352. A condition requiring the submission of further information on and commitment to implementing these measures is recommended to be appended to any grant of approval. This would include the requirement for submission of a post-construction assessment to report on the development's actual WLC emissions following fit-out compared against the anticipated reported in the WLC assessment.

*Circular economy*

353. Policy SI7 Reducing Waste and Supporting the Circular Economy of the London Plan requires referable applications to promote circular economy outcomes and aim to be net zero-waste. These applications are required to submit a Circular

Economy Statement to demonstrate:

- How all materials arising from demolition and remediation works will be re-used and/or recycled.
- How the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life.
- Opportunities for managing as much waste as possible on site.
- Adequate and easily accessible storage space and collection systems to support recycling and re-use.
- How much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy.
- How performance will be monitored and reported

354. A Circular Economy Statement was submitted to support the application. The statement sets out a commitment to further developing the implementation of circular economy principles in both the building and wider development's operational phase, including extending the lifespan of the development, in addition to implementation of an end-of-life strategy for the development according to circular economy principles, including disassembly and deconstruction. Commitments include implementing a pre-demolition audit of the existing building, structure and hard surfaces on the site to assess the potential options for maximising the potential re-use and recovery of the materials in accordance with the waste hierarchy. It is recommended that further information on these aspects of the circular economy commitments be secured by condition.

#### Overheating

355. London Plan Policy SI4 and Policy P68 of the NSP set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The six-step hierarchy is as follows:

356. • Minimise internal heat generation through energy efficient design; then
- Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
  - Manage the heat within the building through exposed internal thermal mass and high ceilings; then
  - Use passive ventilation; then
  - Use mechanical ventilation; then
  - Use active cooling systems (ensuring they are the lowest carbon options).

357. The applicant explored solutions to reduce the need for active cooling within the proposed development, however due to environmental noise (primarily from the railway viaduct located to the east of the site), relying on natural ventilation using openable windows was not a feasible option. As a result an active cooling system would be implemented to ensure the proposal complies with overheating risk requirements. A condition requiring submission of a further updated overheating study to comply with the London Plan policy since its adoption is recommended to be appended to any grant of planning permission.

#### BREEAM

358. Strategic Policy 13 of the Core Strategy requires the commercial elements of the development to achieve a BREEAM “excellent” rating. A BREEAM Pre-assessment report has been undertaken which demonstrates that “excellent” can be achieved for the non-residential elements of the scheme, meeting the policy requirement. It is recommended this is secured by condition.

Water efficiency

359. For the residential component of the development, the applicant has confirmed that the dwellings would have a maximum indoor water consumption of 105 litres per person per day, in line with the optional standard in Part G of the Building Regulations. This complies with Policy SI5 of the London Plan 2021.

**Planning obligations (S.106 agreement)**

360. Saved Policy 2.5 of the Southwark Plan and Policy DF 1 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

361. 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	Issue	Applicant Position
Affordable Housing	Secured 62 residential units at no more than social-rent charges in perpetuity	Agreed
	Restrict use of guest flats to prevent use as permanent accommodation	Agreed
	Restrict use of caretakers flat to staff	Agreed

	Submission of decant strategy to manage impacts of proposal on existing residents of Edward Edward's House	Agreed
Affordable workspace	10% affordable workspace, equivalent to approximately 3,252sqm of which 2,830sqm to be secured in the main office building element, remainder to be provided in the almshouse portion of the development  Rent to be no more than 75% of market rate, with rent- free initial period and service charge caps  Affordable work space marketing and management plan	Agreed  Agreed  Agreed
Archaeology	£11,171	Agreed
Carbon offset	£638,400	Agreed
Employment during construction	83 sustained construction jobs for unemployed Southwark residents, 83 short course places, 20 construction apprentices or pay £399,350 under the Employment and Training Contribution (£356,900 against sustained jobs, £12,450 against short courses, and £30,000 against construction industry apprenticeships).	Agreed



	Construction of new vehicle crossover for access into the servicing area	Agreed
	Repair any damages to the highway due to construction activities for the development including construction work and the movement of construction vehicles.	Agreed
	Securing disabled blue badge car parking spaces on the adjacent site to the north, and commitment to re-providing these in any redevelopment of that site	Agreed
	Adoption of small portions of land on Nicholson and Chancel Streets as public highway	Agreed
	Parking permit free agreement	Agreed
	Cycle hire membership – non-standard arrangement with obligation for offer to be provided to residents on a request-basis	Agreed
	Submission of:	
	Travel Plan	Agreed
	Construction Logistics Plan	Agreed
	Delivery and Servicing Management Plan and agreement to bond payment	Agreed

	Parking Design Management Plan	Agreed
	Contribution of £70,000 towards cycle hire scheme expansion	Agreed
Trees	None 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 - £8,000 per tree.	Agreed
Other	A management and operation strategy for the community space	Agreed
	Post Construction Wind Mitigation Review	Agreed
	'Be Seen' Energy monitoring commitments	Agreed
	Ecological Management Plan	Agreed
Admin fee	2% of total contributions	£64,975

362. In the event that an agreement has not been completed by 28 January 2022, the committee is asked to authorise the director of planning and growth to refuse permission, if appropriate, for the following reason:

363. In the absence of a signed S106 legal agreement there is no mechanism in place to 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 DF 1 Planning Obligations of the London Plan (2021) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

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

364. 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. Southwark's CIL will provide for infrastructure that supports growth in Southwark.
365. In this instance, based on information provided by the applicant, an estimated Mayoral CIL payment of £5.6m and a Southwark CIL payment of £6.3m would be due, totalling 11.9m CIL. Potentially £4.1million of this could be subject to a Social Housing Relief claim for the affordable housing element proposed. This would result in the chargeable amount for this development to be around £7.8million of combined CIL. It should be noted that these figures are an estimate only, and would be calculated in more detail when CIL Additional Information and Assumption of Liability forms are submitted prior to implementation.

## **Consultation**

### Community involvement and engagement

366. The developer has completed an extensive programme of pre-application meetings in addition to consultation and engagement with key stakeholders and the wider community. The consultation area contained approximately 500 addresses surrounding the site, with a mix of residential and commercial uses. In addition to consulting with residents, the consultation programme identified the following political consultees:
- Councillor Johnson Situ (Cabinet Member for Growth, Development and Planning);
  - Ward Members for Borough and Bankside
367. The following community stakeholders were identified:
- - Better Bankside
  - Residents of the Rochester Estate and Quadrant House
  - Youngs and Co.
368. The applicant has set out in their Statement of Community Involvement, the



series of meetings, workshops and events undertaken in order to ensure a fulsome consultation process. This is detailed below:

Event	Date
Meeting with Cllr Johnson Situ and Simon Bevan (then-Head of Planning)	20/06/2019
Meeting with Youngs and Co.	August 2019
Meeting with ward councillors	05/09/2019
Presentation to occupiers of Chancel Street properties	06/07/2020
Letter and leaflet drop to addresses within 150m radius of The site	20/07/2020
On-site public exhibition which included meetings with existing residents of Edward Edward's House, Quadrant House and the Rochester Estate	30/07/2020 01/08/2020

369. 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.

### **Consultation responses from members of the public and local groups**

370. Following neighbour consultation, a total of 70 responses were received from members of the public, the overwhelming majority of which were in support of the application. Reasons for support included:
- provision of an increased amount of affordable housing
  - provision of almshouses for older people
  - quality of design of the residential accommodation in meeting the requirements and needs of older people
  - the provision of the new community garden public space and community hall
  - the sustainability of the proposed building
  - provision of new office space including affordable workspace
  - the architectural approach and general design
  - appropriate height and scale for the area
371. It should be noted that two of the comments in support were submitted onto the council's planning register as 'objections', though the comments themselves are in clear support of the proposal.
372. Three responses objecting to the proposals were received from occupiers of neighbouring properties. Reasons for objecting were:
- Harm to neighbour amenity, including loss of daylight, increased sense of enclosure and noise and disruption from construction period

- Lead-office use inappropriate for the site
- Scale of development inappropriate for site and area
- Change in character of the site and area
- Property values of neighbouring properties will be negatively affected

373. These points are responded to in detail in the main report above, with the exception of impact on property values. While this could be an impact incurred as a result of a proposed development, it is not able to be taken into account as a material planning consideration.
374. One neutral response was received from the Chair of the Quadrant House Residents Association. This requested noise, dust, timings and traffic considerations be taken into account as part of the construction management plan with a view to minimising the impact of the construction period on neighbouring occupiers.

### Consultation responses from external and statutory consultees

375. Environment Agency – No objections subject to conditions.  
**Response** – Noted and agreed.
376. Greater London Authority - The principle of the redevelopment of the site for a significant new office, public house, affordable housing and community use is supported. Provision of 100% affordable housing strongly supported. Confirmation of decant strategy for existing residents should be provided. The proposal would result in less than substantial harm to local heritage assets, which is outweighed by the significant benefits of the scheme, and the scale, height and massing is appropriate for the site and the proposal would comprise a high architectural quality. The development would not have an adverse impact on 'River prospect' views.
377. Initial feedback from the GLA requested further work on trip generation and energy and sustainability in order to ensure submitted assessments were robust and in order to increase policy compliance, and these issues were resolved during the application process. Their response also stipulated requirements regarding setting targets, monitoring and financial obligations where targets are missed for the delivery and servicing management plan and travel plan.
378. **Response** Noted – as set out above the applicant provided further information on trip generation and the energy strategy and environmental performance during the course of the application determination period.
379. Historic England – Historic England considered that the proposal would have a moderate level of less-than-substantial harm to local heritage assets, in particular because of the height of the commercial office volume's impact on the east-facing townscape views from the Roupell Street conservation area located to the west of the site. It considered that the proposal departed from local policy in the proposed height. HE encouraged the applicant to consider design solutions to reduce the impact, including through altering the approach to overall height, façade design and top floors of the building, and ensure the assessment of the

impact of the harm caused by the proposal to heritage assets is carefully considered and robustly justified in light of any potential benefits of the scheme.

380. **Response** – Officers note that Historic England do not object to the proposed development and that the impact on views would comprise, under their assessment, a moderate level of less-than-substantial harm. The applicant amended the arrangement and height of set backs with a view to providing a more slender and articulated top element to the commercial office volume. Officers consider that the scheme has been robustly assessed for its heritage impacts in addition to other impacts, including the benefits from the scheme. On balance, per the main report above, the harm is considered to be relatively minor and outweighed by the benefits of the proposal.
381. London Underground – No comment.  
**Response** – Noted.
382. Metropolitan Police – Acceptable subject to appropriate conditions.  
**Response** – Noted.
383. Network Rail - Given the proximity of the proposed development to Network Rail's infrastructure, Network Rail strongly recommended the developer contacts Network Rail's Asset Protection and Optimisation (ASPRO) team prior to works commencing. Network rail also provided a set of requirements for applicant to comply with both during construction and within the completed development with regard to ensuring works or activities do not encroach or inhibit Network Rail's operations and responsibilities.  
**Response** – Noted, the relevant informatives will be added to any consent issued.
384. Thames Water – No objection subject to condition requiring submission and approval of, in consultation with Thames Water, a Development and Infrastructure Phasing Plan and an informative.  
**Response** - Noted
385. Transport for London – Transport for London provided initial comments regarding both the trip generation figures used in the applicant's submitted Transport Assessment and on the design and provision of cycle parking, including the provision of short-stay spaces for the commercial office to be located in the basement level with longstay spaces. TfL considered that the development is unlikely to have a significant adverse residual impact on the operation of the TLRN, assuming that deliveries are managed to ensure the on-street loading bay on Nicholson Street operates within capacity. Bus and London underground infrastructure was considered to have adequate capacity to accommodate the additional trips to be generated by the development. Alongside the council, TfL were of the view that servicing should take place on-site rather than on-street. The scheme would contribute to providing an improved public realm and has been designed in line with Healthy Streets principles, which was supported.
386. TfL requested a contribution towards expanding the Santander Cycle Hire scheme in addition to a contribution towards their Healthy Streets initiative.
387. The high level of development activity along St Thomas Street and more

generally in the London Bridge area will require additional Cycle Hire capacity. As acknowledged in the TA, a contribution towards expansion would be appropriate. Contributions are also sought towards legible London signage and conditions/s106 obligations should secure a Travel Plan, Construction logistics Plan and Delivery Servicing Plan.

388. **Response** – Noted. The applicant provided further information regarding the trip generation figures to TfL's satisfaction, and provided justification for the proposed cycle parking arrangement, also to TfL's satisfaction. Following initial comments, the applicant proposed a revised servicing arrangement to include an on-site loading bay for smaller vehicles. The applicant will provide a contribution to the Santander Cycle Hire scheme and is in discussion with TfL regarding the financial contribution to the Healthy Streets initiative. This will be finalised as part of any Stage II referral process.

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

389. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
390. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
391. 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

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.

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

393. The principle of the use proposed by the application is acceptable in planning terms as the site is allocated under the NSP. The NSP was itself the subject of a detailed equalities impact assessment. There is nothing in the principle of the redevelopment of the site for the uses proposed in the application that should cause a fundamental inconsistency with the Public Sector Equality Duty (PSED).
394. The site is currently host to almshouses provided at an affordable rate to qualifying elderly people with a local connection to the London Borough of Southwark. The proposal would see these existing 25 almshouse homes demolished and replaced with 62 new self-contained affordable almshouse homes provided to residents on the same basis. In virtue of this, the proposal has the potential to impact older people in Southwark to a greater extent than any other group recognised as a protected characteristic.
395. The development would require the existing residents to be removed from their existing homes in order to permit demolition and site clearance in preparation for construction of the proposal to commence. This has the potential to negatively impact older people in Southwark to a greater extent than any of other groups listed as a protected characteristic above.
396. However, the applicant will be required to submit a decant strategy for approval by the council ensure minimal disruption to these existing residents. It is understood the existing residents will be offered the opportunity to take residents in alternative accommodation within the new build scheme for older people on Southwark Park Road, and that on completion of the proposal, the existing residents will have the right to return to the Blackfriars Road site.
397. This will be confirmed through the approved decant strategy to be secured under the S106 obligations. Taking the care to minimise impact on the existing elderly residents into account, the proposal, by virtue of providing a net increase of more than double the number of affordable almshouse homes on the site than existing, will have a positive impact on the borough.
398. In particular, in virtue of providing almshouses specifically for older people with a connection to Southwark and at the level of affordability proposed, the scheme will impact older people more so than any of the other groups listed under the protected characteristics above. This impact will be overwhelmingly positive, given the affordable housing offer, quality of accommodation, facilities, amenity, design and contribution improved public realm on and around the site. On this basis the proposal is considered to have a positive impact in equalities terms.

### **Human rights implications**

399. 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.
400. This application has the legitimate aim of providing new offices, 62 new almshouses as affordable housing and a caretakers flat, a new public house and

community hall. 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**

401. 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.
402. 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**

403. Was the pre-application service used for this application? **Yes**
404. If the pre-application service was used for this application, was the advice given followed? **Yes**
405. 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**

### **Conclusion**

406. The proposal is in conformity with strategic land use policies set out in the London Plan, the Core Strategy and the draft New Southwark Plan site allocation NSP13. The proposal would provide over 30,000sqm of Grade A office floorspace, generating and contributing a significant number of jobs to the Central Activities Zone. The proposal would comprise a range of uses appropriate for a town centre, including employment, a replacement public house, a community facility, a policy compliant level of affordable work space and self-contained housing.
407. The housing offer would be a substantial contribution to the borough's pipeline of affordable housing and is strongly supported at 100% affordable housing. The terms at which the housing would be let would be more affordable than typical social rent levels, and would be secured to not exceed this in perpetuity. The proposed accommodation in terms of residential design standards and overall provision of communal and amenity facilities will provide an excellent quality of

housing for future residents tailored to meet specific needs of older people.

408. The proposal utilises a successful approach to massing and architectural treatment to minimise the impact of height and scale, and would make a welcome contribution to the Blackfriars Road area in townscape and streetscape terms. The provision of the new open space and public realm is a substantial benefit of the scheme. The proposal would have a less than substantial harm on the identified heritage assets, and would achieve well in excess of the minimum 35% saving on Part L of the 2013 carbon emissions, at 50%.
409. The proposal is considered to be of an appropriate mix of land uses presented a high quality, attractive design which will positively contribute to the Blackfriars Road area and borough. It is for this reason that a grant of planning permission, subject to conditions and completion of a S106 agreement, is recommended.

## BACKGROUND INFORMATION

### BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: www.southwark.gov.uk

## APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received.
Appendix 3	Recommendation (draft decision notice)

## AUDIT TRAIL

<b>Lead Officer</b>	<u>Stephen Platts</u> , Director of Planning and Growth
<b>Report Author</b>	Tom Weaver
<b>Version</b>	Final
<b>Dated</b>	26.08.2021
<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>		26.08.2021



## Consultation undertaken

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

**Press notice date:** 12/01/2021

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

**Neighbour consultation letters sent:** 11/06/2021

### Internal services consulted

Archaeology  
 Community Infrastructure Levy Team  
 Design and Conservation Team [Formal]  
 Local Economy  
 Ecology  
 Environmental Protection  
 Highways Development and Management  
 Section 106 Team  
 Flood Risk Management & Urban Drainage  
 Transport Policy  
 Urban Forester  
 Waste Management

### Statutory and non-statutory organisations

Environment Agency  
 Great London Authority  
 Historic England  
 London Fire & Emergency Planning Authori  
 London Underground  
 Natural England - London & South East Re  
 Network Rail  
 Metropolitan Police Service (Designing O  
 Transport for London  
 Thames Water

### Neighbour and local groups consulted:

Flat 5 Suthring House 220 Blackfriars  
 Road

Flat 4 Edward Edwards House Nicholson  
 Street

Flat 15 Quadrant House 15 Burrell Street  
 13 Friars Close Bear Lane London

Flat 10 Edward Edwards House  
 Nicholson Street

Flat D Christchurch House 4 Chancel Street

Flat 9 1 Treveris Street London

Flat 6 1 Treveris Street London

Ground Floor To Third Floor 230 Blackfriars Road London

Part Basement Ground Floor First Floor And Second Floor 6 Chancel Street London

Flat 4 Suthring House 220 Blackfriars Road

Railway Arches 6 Burrell Street London

10 Brinton Walk London Southwark

Flat E Christchurch House 4 Chancel Street

Flat 7 Edward Edwards House Nicholson Street

Flat 25 Edward Edwards House Nicholson Street

17 Rotherham Walk London Southwark

15 Rotherham Walk London Southwark

13 Rotherham Walk London Southwark

26 Friars Close Bear Lane London

49 Blackfriars Road London Southwark

Units 1 And 2 1 Treveris Street London

Flat 3 31 Dolben Street London

Railway Arch 12 Chancel Street London

Flat 9 Quadrant House 15 Burrell Street

Third Floor To Fourth Floor 209-215 Blackfriars Road London

Flat 6 Edward Edwards House Nicholson Street

Flat 8 Quadrant House 15 Burrell Street

4 Friars Close Bear Lane London

4 Brinton Walk London Southwark

Flat 28 Edward Edwards House Nicholson Street

Flat 8 Edward Edwards House Nicholson Street

Flat 10 Quadrant House 15 Burrell Street

21 Friars Close Bear Lane London

Flat 35 Edward Edwards House Nicholson Street

Flat 33 Edward Edwards House Nicholson Street

Flat 26 Edward Edwards House Nicholson Street

Flat 13 Edward Edwards House Nicholson Street

Flat 34 Quadrant House 15 Burrell Street

Part Basement Rear 42-44 Dolben Street London

Flat 1 Suthring House 220 Blackfriars Road

Colombo Centre 34-68 Colombo Street London

Flat B Christchurch House 4 Chancel Street

Flat 5 Edward Edwards House Nicholson Street

Flat 3 Edward Edwards House Nicholson Street

Flat 12 Edward Edwards House Nicholson Street

1 Rotherham Walk London Southwark

Flat 7 Quadrant House 15 Burrell Street

Flat 5 Quadrant House 15 Burrell Street

Flat 30 Quadrant House 15 Burrell Street

Flat 11 Quadrant House 15 Burrell Street

7 Friars Close Bear Lane London

17 Friars Close Bear Lane London

14 Friars Close Bear Lane London	Flat 24 Quadrant House 15 Burrell Street
Tfl Surface Transport 230 Blackfriars Road London	Flat 2 Quadrant House 15 Burrell Street
First Floor 209-215 Blackfriars Road London	Flat 19 Quadrant House 15 Burrell Street
12 Brinton Walk London Southwark	20 Friars Close Bear Lane London
11 Friars Close Bear Lane London	Flat 5 1 Treveris Street London
Flat 16 Quadrant House 15 Burrell Street	Flat 2 31 Dolben Street London
Third Floor Great Surrey House 203 - 205 Blackfriars Road	Railway Arch 7 Chancel Street London
1 Burrell Street London Southwark	Basement Store Friars Bridge Court 41 - 45 Blackfriars Road
Flat 38 Edward Edwards House Nicholson Street	Fourth Floor 209 - 215 Blackfriars Road London
Flat 24 Edward Edwards House Nicholson Street	Flat 1 Edward Edwards House Nicholson Street
Flat 21 Edward Edwards House Nicholson Street	2 Brinton Walk London Southwark
Flat 6 Quadrant House 15 Burrell Street	Flat 15 Edward Edwards House Nicholson Street
Flat 4 Quadrant House 15 Burrell Street	Part Basement Front 42-44 Dolben Street London
Flat 28 Quadrant House 15 Burrell Street	Fifth Floor 209-215 Blackfriars Road London
Flat 22 Quadrant House 15 Burrell Street	3 Burrell Street London Southwark
Post Office 52 Blackfriars Road London	Pro Insight Colombo Centre 34-68 Colombo Street
Flat 3 1 Treveris Street London	10 Friars Close Bear Lane London
Second Floor 209-215 Blackfriars Road London	Flat 30 Edward Edwards House Nicholson Street
9 Brinton Walk London Southwark	Flat 32 Quadrant House 15 Burrell Street
8 Brinton Walk London Southwark	4 Nicholson Street London Southwark
5 Brinton Walk London Southwark	Railway Arch 13 Chancel Street London
11 Brinton Walk London Southwark	Flat 1 31 Dolben Street London
Flat 36 Edward Edwards House Nicholson Street	6 Nicholson Street London Southwark
Flat 16 Edward Edwards House Nicholson Street	18 Nicholson Street London Southwark
7 Rotherham Walk London Southwark	Flat 9 Edward Edwards House Nicholson Street

Flat 23 Edward Edwards House  
Nicholson Street

11 Rotherham Walk London Southwark

Flat 12 Quadrant House 15 Burrell Street

22 Friars Close Bear Lane London

1 Friars Close Bear Lane London

46 Blackfriars Road London Southwark

Ground Floor 42-44 Dolben Street  
London

Fourth To Seventh Floors 230 Blackfriars  
Road London

Unit 2 1 Treveris Street London

32 - 40 Blackfriars Road London  
Southwark

14 Rotherham Walk London Southwark

First Floor 42-44 Dolben Street London

Flat 22 Edward Edwards House  
Nicholson Street

4 Rotherham Walk London Southwark

Flat 21 Quadrant House 15 Burrell Street

3 Friars Close Bear Lane London

Railway Arch 9 Chancel Street London

Part Basement And Part Ground Floor  
Christchurch House 4 Chancel Street

36 Bear Lane London Southwark

24 Friars Close Bear Lane London

Flat 3 Quadrant House 15 Burrell Street

16 Nicholson Street London Southwark

6 Brinton Walk London Southwark

Railway Arch 4 Burrell Street London

7 Bear Lane London Southwark

Flat 3 Suthring House 220 Blackfriars  
Road

Flat 2 Suthring House 220 Blackfriars  
Road

Prince William Henry 216-219 Blackfriars  
Road London

2 Nicholson Street London Southwark

7 Brinton Walk London Southwark

14 Brinton Walk London Southwark

13 Brinton Walk London Southwark

Flat C Christchurch House 4 Chancel  
Street

Flat 31 Edward Edwards House  
Nicholson Street

Flat 27 Edward Edwards House  
Nicholson Street

Flat 19 Edward Edwards House  
Nicholson Street

3 Rotherham Walk London Southwark

16 Rotherham Walk London Southwark

Flat 36 Quadrant House 15 Burrell Street

Flat 29 Quadrant House 15 Burrell Street

Flat 27 Quadrant House 15 Burrell Street

Flat 10 1 Treveris Street London

Flat 4 1 Treveris Street London

Flat 5 31 Dolben Street London

Second Floor And Third Floor 42-44  
Dolben Street London

70 Colombo Street London Southwark

12 Rotherham Walk London Southwark

Railway Arch 8 To 8A Chancel Street  
London

9 Friars Close Bear Lane London

6 Friars Close Bear Lane London

2 Rotherham Walk London Southwark

Flat 32 Edward Edwards House  
Nicholson Street

8 Rotherham Walk London Southwark

Flat 33 Quadrant House 15 Burrell Street

Flat 23 Quadrant House 15 Burrell Street

16 Friars Close Bear Lane London

Flat 31 Quadrant House 15 Burrell Street

23 Friars Close Bear Lane London

Railway Arch 10 Chancel Street London

19 Friars Close Bear Lane London

9 Rotherham Walk London Southwark

Flat 25 Quadrant House 15 Burrell Street

Flat 20 Quadrant House 15 Burrell Street

Flat 13 Quadrant House 15 Burrell Street

Railway Arch 11 Chancel Street London

Flat 4 31 Dolben Street London

Flat Above Prince William Henry 216-  
219 Blackfriars Road

Basement To Second Floor Great Surrey  
House 203-205 Blackfriars Road

Flat 39 Edward Edwards House  
Nicholson Street

6 Rotherham Walk London Southwark

Flat 35 Quadrant House 15 Burrell Street

Flat 17 Quadrant House 15 Burrell Street

Flat 1 Quadrant House 15 Burrell Street

8 Friars Close Bear Lane London

25 Friars Close Bear Lane London

18 Friars Close Bear Lane London

Flat 8 1 Treveris Street London

202 Blackfriars Road London Southwark

Flat 7 1 Treveris Street London

8 Chancel Street London Southwark

10 Nicholson Street London Southwark

8 Nicholson Street London Southwark

Flat 1 45 Dolben Street London

Flat 29 Edward Edwards House  
Nicholson Street

5 Rotherham Walk London Southwark

Flat 18 Quadrant House 15 Burrell Street

Flat A Christchurch House 4 Chancel  
Street

3 Brinton Walk London Southwark

1 Brinton Walk London Southwark

Railway Arch 10 Treveris Street London

Flat 2 45 Dolben Street London

14 Nicholson Street London Southwark

12 Nicholson Street London Southwark

Flat 37 Edward Edwards House  
Nicholson Street

Flat 18 Edward Edwards House  
Nicholson Street

10 Rotherham Walk London Southwark

Flat 26 Quadrant House 15 Burrell Street

Flat 14 Quadrant House 15 Burrell Street

5 Friars Close Bear Lane London

2 Friars Close Bear Lane London

15 Friars Close Bear Lane London

12 Friars Close Bear Lane London

Flat 11 1 Treveris Street London

Basement To Ground Floor 209-215  
Blackfriars Road London

**Re-consultation:**

## Consultation responses received

### Internal services

Archaeology  
 Community Infrastructure Levy Team  
 Design and Conservation Team [Formal]  
 Ecology  
 Environmental Protection  
 Highways Development and Management  
 Section 106 Team  
 Transport Policy  
 Urban Forester

### Statutory and non-statutory organisations

Environment Agency  
 Great London Authority  
 London Fire & Emergency Planning Authority  
 Metropolitan Police Service (Designing O  
 Thames Water

### Neighbour and local groups consulted:

Pecan 121A Peckham High Street  
 London

1a Welby Street London

United St Saviour's Charity 39-41 Union  
 St London

Flat 5 137 Trafalgar Street London

48 Union Street London SE1 1TD

4 Nicholson Street London SE1 0XP

Cambridge House 1 Addington Square  
 London

Flat1 137 Trafalgar Street London SE17  
 2TP

30 Half Moon Lane Herne Hill London

Billingbear Lodge,, Maidenhead Road  
 Wokingham

Zig Zag House 70 Victoria St London

GREENSANDS BRASSEY ROAD  
 OXTED

Flat 1 137 Trafalgar Street London

The Master, WCSIM 9 Montague Close  
 London

Scheme Manager Trinity Hospital  
 Almshouse Old Woolwich Road  
 Greenwich

92 Grove Park London SE5 8LE

33 Upper Park Loughton IG10 4EQ

Chief Officer, Taunton Heritage Trust  
 Huish Homes, Magdalene Street Taunton

St. Johns Vicarage 18 Larcom Street  
 London

11 Lynden Hyrst Addiscombe Road  
Croydon

Somer Barns Camp Lane, Great Witley  
Worcester

33 Musgrove Road London SE14 5PP

21 Coombe Wood Hill Purley CR8 1JQ

25 Rotherwick Road London NW11 7DG

Southwark Pensioners' Centre 305-307  
Camberwell Road London

Blackfriars Settlement 1 Rushworth  
Street London

137 trafalgar street flat 3 flat 3 London

Feltham Hill Road Ashford Middlesex

St Paul's Vicarage Lorrimore Square  
London

Flat 13 Drake Court 12 Swan Street  
London

4 Nicholson Street London London

4 Suthring Hse 220 Blackfriars Road  
London

21 Model Cottages London SW14 7PH

Saddlers' House Gutter Lane London

Exeter Homes Trust 6 Southernhay West  
Exeter

16 EDWARD EDWARDS HOUSE  
NICHOLSON STREET LONDON

AgeUK Lewisham and Southwark 95  
Southwark Park Road Bermondsey

8 Waldemar Avenue London SW6 5NA

25 St Mary Newington Close London  
SE17 2LP

90 Rye Hill Park London

International House Brixton SW9 7QE

York House 35, Clapham Common  
South Side London

Glaziers Hall 9 Montague Close  
LONDON

The Sheppard Trust 12 Lansdowne Walk  
London

Hurst Cottage Sutton Pulborough

351 Southwark Park Road London SE16  
2JW

Kames 34 Park road Limpsfield Surrey

15 Great Jubilee Wharf London E1W  
3TH

Network Rail 1 Eversholt Street London

121A Peckham High Street Peckham  
London

1 Rushworth Street London SE1 0RB

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Stones End Centre 11 Scovell Road  
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24 Barforth Road Peckham Rye London

26 Wentworth Park London N3 1YG

1 Addington Square 1 Rossetti Road  
London

St Peter's Church, Walworth Liverpool  
Grove London

67 Liverpool Grove Walworth London



66 Annandale Road Greenwich London

4 Mill Close Wickhambreaux Canterbury

Bickenhall House Bickenhall Taunton

Bridge House 56 Commonside,  
Westbourne Emsworth

18 Nicholson Street Blackfriars Road  
London

45 Dolben Street London SE1 0UQ

160 Tooley Street London SE1

## Relevant Planning History

Reference and Proposal	Status
No relevant planning history	



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**Application reference no.: 21/AP/0599**

**Address: 1 Southwark Bridge Road, London, Southwark, SE1 9EU**

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<b>Item No.</b>	<b>Classification:</b> OPEN	<b>Date:</b> 7 September 2021	<b>Meeting Name:</b> PLANNING COMMITTEE
<b>Report title:</b>	<b>Development Management planning application:</b> Application 21/AP/0599 for: Full Planning Application  <b>Address:</b> 1 Southwark Bridge Road, London, Southwark, SE1 9EU  <b>Proposal:</b> Refurbishment, recladding and extension of the existing office building to provide office floorspace, a retail unit, public realm and landscaping, and other associated works.		
<b>Ward(s) or groups affected:</b>	Borough and Bankside		
<b>From:</b>	Director of Planning and Growth		
<b>Application Start Date</b>	22.02.2021	<b>Application Expiry Date</b>	24.05.2021
<b>Earliest Decision Date</b>	25.06.2021	<b>Extension of Time End Date</b>	07.01.2022

## RECOMMENDATION

1.
  - a) That full planning permission be granted for 21/AP/0599, subject to conditions and the applicant entering into a satisfactory legal agreement.
  - b) That in the event that the legal agreement is not been entered into by 7th January 2021 the Director of Planning and Growth be authorised to refuse planning permission for 21/AP/0599, if appropriate, for the reasons set out in paragraph 319 of this report.

## EXECUTIVE SUMMARY

2. Located at the bridgehead of Southwark Bridge and occupying a prominent position on the Thames Path, the application site is in the Central Activities Zone, an Opportunity Area and the Borough and Bankside District TownCentre. It is occupied by a seven-storey building, which has stood vacantsince late 2019, having been occupied up until that time by news and media

outlet the Financial Times

3. The applicant, advertising and public relations agency WPP, acquired a lease on the site in early 2019. The company proposes to partially demolish, reconfigure, re-clad and extend the existing building with the intention of occupying it as part of their London campus. It will form the third and final element of the campus, with the other two buildings being Sea Containers Building, which opened following a significant refurbishment in 2016, and the upgraded and extended Rose Court Building at 2 Southwark Bridge Road, which is due to open imminently. Together, the three campus sites will accommodate approximately 6000 WPP employees.
4. The proposed eight storey scheme would be office-led with a ground floor retail unit fronting the Thames Path. These uses would be supported by two new publicly-accessible spaces, one in the form a pocket park and the other a hard-landscaped street running alongside the Southwark Bridge arches. A new forecourt for drop-offs and wheelchair parking would be provided, along with a separately-accessed internal loading yard.
5. A total of six representations were received from members of the public about the application. Of these, 2 were in objection, 1 was neutral and 3 were in support. The main material planning considerations raised by the representations were:
  - potential overlooking and associated privacy infringement for nearby residents from the proposed southern roof terrace;
  - potential noise and disturbance for nearby residents from the retail unit and pocket park;
  - proposal would be of an excessive height with potential to harm borough views;
  - noise, dust, dirt, vehicular disturbance and high traffic levels during the construction phase;
  - lack of safe and direct/convenient cycle routes into the site;
  - negative impact on pedestrians, in terms of safety and ease of flow, along Park Street;
  - delivery/servicing trips may be unneighbourly, and would be higher in number than estimated by the applicant;
  - the opening hours of the pocket park are not generous enough;
  - the design and management of the pocket park, as well as its relationship to any neighbouring Red Lion Court site and any future public space on that site, is unclear.
6. In land use terms, the application is welcomed in principle. The increase in office floorspace, and consequential increase in employment, supports the development plan objectives for the area and accords with key policies at national, regional and local level. 10% of the uplift in office space would be

offered as affordable workspace, which is a major benefit of the scheme. The inclusion of a flexible retail/café on the Thames Path frontage is welcomed, and would add interest on what is presently an unengaging stretch of the riverside walkway, and the widening of the Thames Path at the exit from Southwark Bridge underpass is also beneficial.

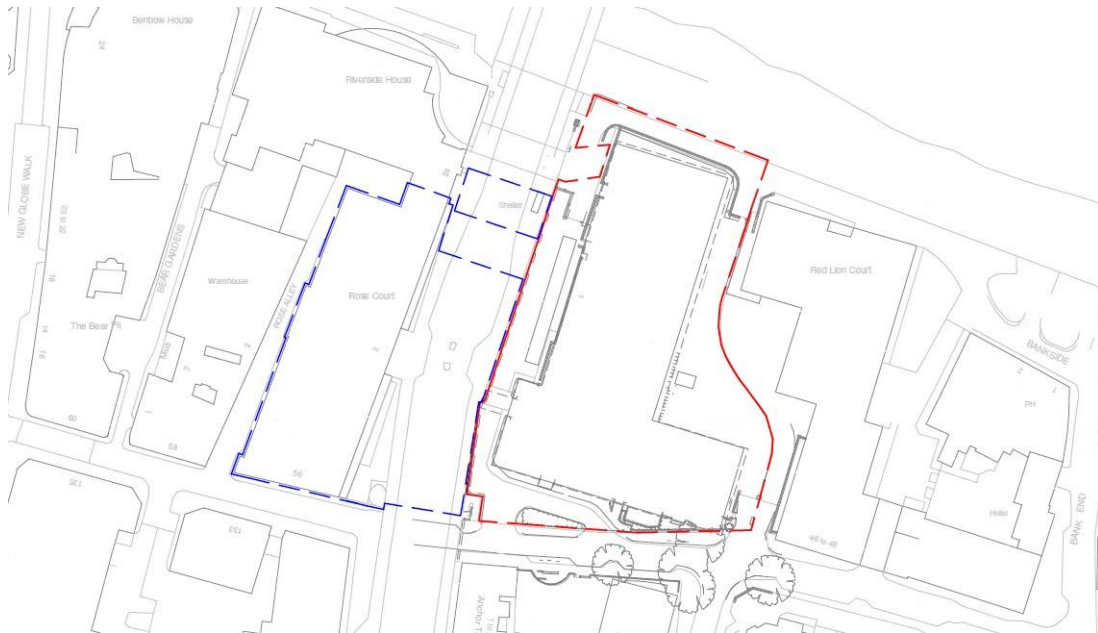
7. The proposal would result in one substantial adverse daylight impact and a small number of minor adverse daylight impacts to nearby residential windows. The main body of the report details the reasons for these impacts, the context within which they would occur and the mitigating factors. In respect of outlook and privacy impacts, the report sets out why the separation distances between the development and surrounding dwellings are considered adequate.
8. The proposal is to be commended for its sustainable design approach, whereby the majority of the existing structure would be retained and refurbished, driving down embodied carbon emissions. Passive technologies to ventilate, light and thermally regulate the internal spaces have also been optimised.
9. Of a high standard of architecture and urban design, the proposal would achieve a comfortable scale relative to its surroundings, protecting all important views and preserving the character and setting of nearby heritage assets. The various new publicly-accessible spaces are a benefit of the scheme, providing valuable greening and enhanced pedestrian permeability for the local community and visitors alike, with hours of access that reflect the likely patterns of public use.
10. The construction logistics and environmental management strategy is considered to be robust, setting out appropriate noise, dust and dirt abatement measures alongside appropriate trip consolidation and vehicle routing. Furthermore, by committing to regular resident liaison throughout the construction phase, the applicant has responded positively to the concerns raised by local residents about the cumulative impacts of numerous sites being developed in this location.
11. As the report explains, the proposal would make efficient use of a substantial under-utilised site to deliver a high quality and sustainable development that accords with the Council's aspirations for the area. In addition to the economic benefits brought by this proposal, such as the significant uplift in office space and attendant job creation, a range of financial contributions will be secured to offset the impacts of the development and assist with local and London-wide infrastructural investment.

## **BACKGROUND INFORMATION**



## Site location and description

12. The application site is an existing office building, formerly occupied by the Financial Times, on a 0.54 hectare broadly square-shaped plot of land located in the Borough and Bankside ward. It is bounded:
- to the north by the Thames Path;
  - to the east by Red Lion Court, an office building constructed in the early 1990s;
  - to the south by Park Street; and
  - to the west by the elevated Southwark Bridge Road (A300), underneath which are a series of brick arches forming the base of Southwark Bridge.



*Figure 01 (above): Site location plan, showing the site boundary edged in red and other land within the applicant's ownership edged in blue.*

13. Dating from the late 1980s, the building is a seven-storey concrete frame structure clad in dark tinted double-glazed curtain walling with an additional rooftop recessed storey of plant. The lawful existing use of the building is as offices (Class E). The ground floor of the building is level with Park Street at the south, sits two whole storeys below the level of Southwark Bridge to the west, and is approximately a half storey below the level of the Thames Path to the north.



*Figure 02 (above): Aerial view of the application site with the existing FT building edged in red.*

14. The remainder of the site consists of several areas of hardstanding, including the forecourt fronting Park Street as well as controlled vehicular access to the north-south route flanking the eastern side of Southwark Bridge. The spaces around the building are tarmacked, gated and not publicly accessible.
15. At present, the principal pedestrian access to the building is via the private forecourt fronting Park Street. A secondary point of access is provided by a stepped pedestrian footbridge that links directly to Southwark Bridge Road. Servicing and deliveries are currently accommodated within a servicing yard located between the Financial Times Building and its neighbour to the east, Red Lion Court.

### Surroundings and designations

16. The area is of a mixed character, comprising offices, residential, commercial, cultural and leisure uses. Building heights vary considerably.
17. Adjacent to the east is the exclusively commercial Red Lion Court, which is partly five and partly eight storeys, beyond which are much lower rise leisure and hotel uses around Bank End. To the south of the site are three-, four- and five-storey residential uses at Anchor Terrace, Old Theatre Court, Gatehouse Square and Perkins Square. Opposite the site on the western side of Southwark Bridge Road are two commercial buildings, Rose Court and Riverside House; when seen from the raised level of Southwark Bridge Road, these buildings stand ten and twelve storeys high respectively. Beyond these

buildings to the south and east is a mix of residential, education, leisure and commercial uses in buildings of between two and eleven storeys. To the west of the site and within 250 metres are the nationally important leisure uses at the Tate Modern and the Globe Theatre.

18. In terms of architectural style, the immediate surroundings comprise a mix of 1970s/1980s commercial buildings and some historic brick industrial buildings. While the majority of nearby residential buildings are brick-faced and date from the 1970s/1980s, immediately to the south of the application site is a row of well-preserved Georgian townhouses at Anchor Terrace.
19. The emerging context will comprise more intensive high-rise development. The Rose Court refurbishment opposite the site is a similar refurbishment and extension of the existing office (Class E) building with new roof extension at levels 10 and 11. Its consented height is 12 storeys (56.28 metres AOD). Other schemes under construction include those at 185 Park Street, which will see the introduction of buildings as tall as nineteen storeys (67.10 metres AOD), and the 133 Park Street and 105 Sumner Street scheme, which will stand ten storeys (42.85 metres AOD) high.
20. The site falls within:
  - NSP Site Allocation NSP05;
  - the Central Activities Zone;
  - London Bridge, Borough and Bankside Opportunity Area;
  - Bankside and Borough District Town Centre;
  - Bankside, Borough and London Bridge Strategic Cultural Area;
  - Better Bankside Business Improvement District Area;
  - the Thames Policy Area;
  - the Article 4 Direction removing permitted development rights for the change of use, within the Central Activities Zone, from offices to residential;
  - Flood Zone 3 (in an area benefitting from flood defences);
  - the Air Quality Management Area;
  - “North-West” Multi-Ward Forum Area; and
  - Community Infrastructure Levy Charging Zone 1.
21. The River Thames, which is adjacent to the site, is a Site of importance for Nature Conservation (SINC).
22. In respect of heritage designations, the site contains no listed structures and is no part of it is within a conservation area. The Thrale Street Conservation Area is, however, within very close proximity, its northern boundary running along the centre of Park Street and being only 5 metres to the south of the application site.

23. 50 metres to the west is Bear Gardens Conservation Area, and approximately 175 metres to the east is Borough High Street Conservation Area. Owing to the visual obstruction caused by Southwark Bridge and the Cannon Street Bridge viaduct, it is not possible to observe the application site and these two designated heritage assets within the same viewframe.
24. The following Grade II listed buildings are within 250 metres of the site:
- Southwark Bridge (approx. 5 metres west of the site);
  - Nos. 1-15 Anchor Terrace and attached railings (approx. 10 metres south of the site);
  - Union Works, No. 60 Park Street (approx. 90 metres west of the site);
  - Post at West Corner of Rose Alley (approx. 60 metres west of the site);
  - Anchor Public House, No. 1 Bankside (approx. 90 metres east of the site);
  - Nos. 51 and 52 Cardinals Wharf (approx. 225 metres west of the site); and
  - No. 49 Cardinals Wharf, and railings at door (approx. 225 metres west of the site)
25. The application site is currently located within the 'Borough, Bermondsey and Rivers' Archaeological Priority Zone (APZ) and when the New Southwark Plan is adopted will be within the newly named 'North Southwark and Roman Roads' Archaeological Priority Area (APA). Within 100 metres are the scheduled monuments of the Rose Theatre (an internationally important archaeological site) and the broadly contemporary playhouses of the Globe Theatre, the Hope Theatre and the bear-baiting arenas. These scheduled moments have a group value of international importance.
26. With respect to strategic and borough views, the site is within:
- the background region of Protected View 1A of the London View Management Framework (Alexandra Palace viewing terrace to St Pauls Cathedral);
  - the background region of Protected View 3A of the London View Management Framework (Kenwood viewing gazebo to St Paul's Cathedral);
  - the Southwark Bridge River Prospect 12 (Upstream at 12A.2 and downstream at 12B);
  - Borough View 1 (The London Panorama of St Paul's Cathedral from One Tree Hill);
  - Borough View 2 (The Linear View of St Paul's Cathedral from Nunhead Cemetery; and
  - the Wider Setting Consultation Area of Borough View 2 (Nunhead Cemetery to St Pauls Cathedral).

27. The site is also visible within the protected view corridor to the Monument in the City of London's Protected View SPD.
28. Although there are no trees within the boundary of the site, there is one tree on the northern footway of Park Street to the immediate south of the existing building. There is some other minor vegetation in planters around the building's base.
29. With respect to transport designations, the application site is:
  - within PTAL Zone 6b, representing the highest possible public transport accessibility level; and
  - within the Bankside Controlled Parking Zone (operational from 08:00hrs to 18:30hrs on Monday to Friday and 09:30hrs to 12:30hrs on Saturdays).
30. With respect to parking and servicing infrastructure locally, there are:
  - 10 paid-for parking bays to the east of the application site on the northern and southern sides of Park Street;
  - 7 paid-for parking bays on Southwark Bridge Road to west of the application site;
  - 3 permit-holder parking bays on the southern side of Park Street directly to the south of the application site;
  - 3 permit-holder parking bays on the northern side Park Street to the west of the application site, in the arch beneath Southwark Bridge;
  - 1 disabled bay at the north of Porter Street;
  - 1 disabled bay on Southwark Bridge Road; and
  - a small number car club bays, the closest of which is on Emerson Street.
31. The nearest transport hubs are London Bridge tube and mainline railway station, approximately 500 metres to the east, and Cannon Street station, a similar distance to the north of the site. Regular bus services operate along Southwark Bridge Road and Southwark Street, and the Bankside Pier riverboat service is also nearby, located approximately 100 metres away at the northern end of New Globe Walk. The pedestrian routes around the application site provide easy access to the bus stops and underground stations.
32. Two dedicated cycle lanes exist nearby. These are Cycle Super Highway 7, which runs north-to-south along Southwark Bridge Road, and Southbank Quietway, which runs east-to-west along Park Street. The Council has recently delivered a temporary pandemic recovery scheme for Cycle Super Highway 7, which has introduced a segregated cycle lane and associated changes to the bus stop and coach parking in Southwark Bridge Road adjacent to the site. A Council project to provide safer cycling westbound

along Sumner Street, with the potential for cyclist to loop around onto Park Street, is currently in development.

33. There are in excess of 40 public cycle spaces within a 100 metres radius of the site. These can be found in clusters of 'Sheffield' or 'Camden' stands on Park Street, Southwark Bridge Road and Bank End.
34. All roads adjacent to the site are adopted highways. Southwark Bridge Road is a classified A Road and a Bus Priority Network route.

## **Details of proposal**

### Overview

35. Planning permission is sought for the refurbishment and extension of the existing office building to provide an additional storey at roof level, extensions to the east elevation at levels 03 to 06, to the west elevation at levels 02 to 06, and to the south elevation at levels 03 to 06. Accounting for rooftop plant, the building would stand 34.3 metres above ground level (37.5 metres AOD) at its maximum point.
36. The proposed building would deliver 25,635 square metres GIA of market rent Grade A office floorspace, a self-contained affordable workspace unit of 764 square metres GIA, and a retail unit of 121 square metres. In total, 26,520 square metres GIA of floorspace would be delivered. With respect to the office element only, the proposal would generate 7,790 square metre GIA uplift on the existing office building.
37. All floors would be broadly L-shaped, presenting principal frontages onto Park Street, Southwark Bridge Road and the Thames Path, with secondary frontages framing a publicly-accessible pocket park to the east. Levels 00, 01 and 02 would be recessed along the full length of the Thames Path and Park Street, and along parts of the building's west and pocket park elevations. Where levels 03, 04, 05 and 06 of the building would project out beyond the storeys below, columns would provide support. On all elevations, level 07 would be stepped-back from level 03-06, with the rooftop plant above (at level 08) set-back further still.
38. The basement would accommodate plant and a retained UKPN substation. The ground floor would comprise the reception/foyer area for the main office, a canteen, cycle storage facilities, an integral loading/servicing yard, and the lower floor of the self-contained affordable workspace unit. On level 01 would be the upper storey of the canteen, the upper storey of the self-contained affordable workspace unit, market rate office space and associated break-out and meeting facilities, and a retail/cafe unit fronting the Thames Path.



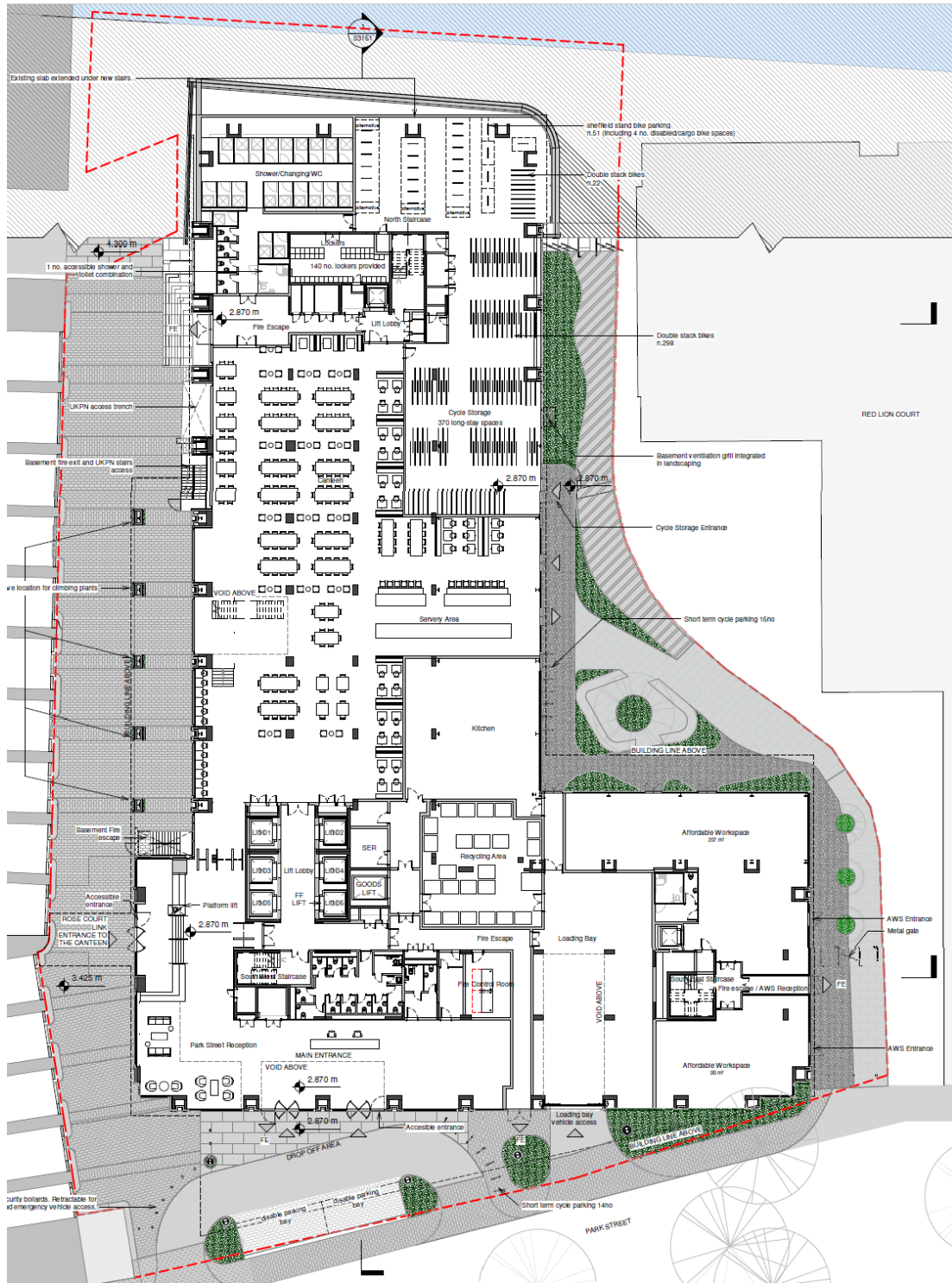


Figure 03 (above): Ground floor layout of the proposed development, including the landscaping of the surrounding external spaces.

39. The five floors above (levels 02 to 06) would be given over to the market rate office floorspace; this would be provided in an open-plan gridded layout, allowing for sub-division to accommodate multiple tenants should the need

arise. The uppermost floor (level 07) would comprise corporate ancillary meeting/event facilities including a bar/dining space, some office floorspace and two external terraces.

40. All floors would be linked by two circulation cores containing lifts and a stairwell, as well as a separate staircase-only emergency exit core.
41. With respect to materiality, new curtain walling is proposed in place of the existing dark glazed cladding. On all eight storeys of the building, the replacement facade system would be framed in bronze-coloured anodised aluminium. Additional elevational features are proposed on floors 03 to 06 in the form of vertical metalwork fins and projecting horizontal spandrels, helping to establish a clear base, middle and top to the building. The existing columns would be overclad in glass reinforced concrete (GRC), as would a series of new triple-height columns to be introduced around the base. This GRC finish would also be applied to the expressed floorslabs at levels 03, 07 and 08. Rooftop plant would be concealed by a dark blue/green metal enclosure.



*Figure 04 (above): View of the proposal, as seen looking southeastwards from Southwark Bridge.*

42. The trench lightwells which enclose the existing building around its northern perimeter would be infilled. This would enable some widening of the Thames Path to occur together with a short run of 'wrap around' steps leading up to the raised northern entrance of the building.





*Figure 05 (above): View of the proposed development from the Thames Path, looking eastwards*



*Figure 06 (above): View across the proposed pocket park, with Red Lion Court visible to the right-hand side*

43. On the eastern portion of the site, a new publicly-accessible pocket park is proposed, through which a gently sloping pedestrian route would weave, providing a step-free link from Bankside to Park Street. The pocket park would contain soft planting, a tree and public seating. It would also be directly accessible from, and overlooked by, the proposed staff canteen and affordable workspace. The pocket park would be open between 08:00hrs and 20:00hrs on Mondays to Sundays (including Bank Holidays).
44. The strip of land to the south of the building, which is currently a fenced parking and drop-off area, would become a triple-height canopied space as a result of the proposed floorplate extension at levels 03 to 06. The land itself would be remodelled as a hard-surfaced forecourt to the main entrance, with drop-off area and two disabled parking bays.



*Figure 07 (above): View westwards along Park Street towards Southwark Bridge, showing the triple-height canopied main entrance to the building.*

45. A new north-south route would be created along the western edge of the building, alongside the arches beneath Southwark Bridge Road. To be named the West Urban Street, the route would be predominantly hard surfaced and provide pedestrian access from Bankside to Park Street. The proposed staff canteen and social area would provide an active ground floor frontage along the route's eastern edge.



*Figure 08 (above): View northwards along the West Urban Street looking*

*towards the Thames, with the proposed building to the right hand side of the image and the arches beneath Southwark Bridge Road to the left hand side.*

46. Most servicing, including all refuse collections, would take place on-site from a new internal loading yard, accessed from Park Street. Long-stay cycle storage would be provided in a dedicated store room on the ground floor level of the building, while short-stay cycle parking would be distributed in the publicly-accessible realm around the building.

### **Planning history of the application site and nearby sites**

47. Appendix 3 sets out in detail the full planning history for the site as well as details of relevant applications on adjoining or nearby sites.

### **Pre-application engagement and mid-application amendments**

48. Planning application 21/AP/0599 has been submitted following a detailed pre-application enquiry, the reference number for which is 19/EQ/0138. During the course of the pre-application enquiry, the applicant made various amendments to the pre-application proposal. At the end of this iterative process, the Council issued a formal response letter. Although the letter was confidential at the time of issue, in accordance with the Council's commitment to ensuring all information relevant in the determination of a planning application is made publicly available, the response letter has been published on the Public Access for Planning Register alongside the 21/AP/0599 application documents. The letter should be referred to if any further information is required about the pre-application process.
49. Over the course of the planning application process, the applicant has made further refinements to the proposal in response to concerns raised by the consultation process and/or issues highlighted by officers. These changes include:
- scaling-back of the façade illumination proposals;
  - agreement to provide a wheelchair lift at the existing stepped access into the site from Southwark Bridge Road will be incorporated into the revised design; and
  - refinement of various documents, including the Construction Environmental Management Plan, Construction Logistics Plan and archaeological reports.

### **Other relevant land ownership considerations**

50. The applicant currently has a lease on 14 of the 16 existing arches to the west of the site. The applicant intends at a future time to upgrade the facades of these arches and use two of them to create a pedestrian link under Southwark

Bridge Road between the application site and Rose Court, which is also in the ownership of the applicant, WPP. The applicant is also currently in discussions with the freeholder of the arches in order to explore the potential to use the arches for a range of commercial and retail uses. The arches do not form part of this planning application.

51. Although the applicant intends to submit a standalone planning application for the works to the arches in due course, this cannot be guaranteed. Therefore any potential future development of the arches should not be given any weight in the determination of 21/AP/0599.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

52. The main issues to be considered in respect of this application are:
- Environmental impact assessment;
  - Principle of the proposed development in terms of land use;
  - Affordable workspace;
  - Impact of proposed development on amenity of adjoining occupiers;
  - Design, layout and impact on heritage assets;
  - Landscaping and trees;
  - Ecology and biodiversity;
  - Transport and highways;
  - Environmental matters;
  - Energy and sustainability;
  - Water resources and flood risk;
  - Archaeology;
  - Socio-economic impacts;
  - Planning obligations;
  - Mayoral and Borough Community Infrastructure Levies;
  - Community involvement and engagement;
  - Consultation responses from members of the public;
  - Consultation responses from internal and divisional consultees;
  - Consultation responses from external consultees;
  - Community impact and equalities assessment;
  - Human rights;
  - Positive and proactive statement, and;
  - Other matters.
53. These matters are discussed in detail in the 'Assessment' section of this report.

## Legal Context

54. 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 2021, the Core Strategy 2011, and the Saved Southwark Plan 2007. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.
55. 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

### National Planning Policy Framework (NPPF)

56. The revised National Planning Policy Framework ('NPPF'), published on 20 July 2021, sets out the national planning policy and how this should be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. At its heart is a presumption in favour of sustainable development.
57. Paragraph 2 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.
58. The relevant chapters of the NPPF are:
- Chapter 2 - Achieving sustainable development
  - Chapter 6 - Building a strong, competitive economy
  - 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 2021

59. On 2 March 2021, the Mayor of London published the London Plan 2021. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London.
60. The strategic objectives of the London Plan 2021 are to build strong and inclusive communities, make the best use of land, promote a healthy city, optimise housing delivery including affordable housing, conserve and enhance London's global competitiveness, and move towards a more resilient and sustainable city. Development proposals must comply with the various policies within the Plan and should follow the guidance set out within Supplementary Planning Documents, Guidance and Strategies.
61. The relevant policies of the London Plan 2021 are:
- Good Growth 2 - Make the best use of land
  - Good Growth 3 - Creating a Healthy City
  - Good Growth 5 - Growing a good economy
  - Good Growth 6 - Increasing efficiency and resilience
  - Policy SD1 - Opportunity Areas
  - Policy SD4 - The Central Activities Zone
  - Policy SD5 - Offices, other strategic functions and residential development in the CAZ
  - Policy SD6 - Town centres and high streets
  - Policy SD7 - Town centres: development principles and Development Plan Documents
  - Policy SD8 - Town centre network
  - Policy SD9 - Town centres; Local partnerships and implementation
  - Policy SD10 - Strategic and local regeneration
  - Policy D1 - London's form, character and capacity for growth
  - Policy D2 - Infrastructure requirements for sustainable densities
  - Policy D3 - Optimising site capacity through design-led approach
  - Policy D4 - Delivering good design
  - Policy D5 - Inclusive design
  - Policy D8 - Public realm
  - Policy D9 - Tall buildings
  - Policy D11 - Safety, security and resilience to emergency
  - Policy D12 - Fire safety
  - Policy D14 - Noise
  - Policy E1 - Offices
  - Policy E2 - Providing Suitable Business Space
  - Policy E3 - Affordable Workspace

- Policy E8 - Sector growth opportunities and clusters
- Policy E9 - Retail, market and hot food takeaways
- Policy E11 - Skills and opportunities for all
- Policy HC1 - Heritage conservation and growth
- Policy HC3 - Strategic and Local Views
- Policy HC4 - London View Management Framework
- Policy HC5 - Supporting London's culture and creative industries
- Policy G1 - Green infrastructure
- Policy G4 - Open space
- Policy G5 - Urban greening
- Policy G6 - Biodiversity and access to nature
- Policy G7 - Trees and woodlands
- Policy SI 1 - Improving air quality
- Policy SI 2 - Minimising greenhouse gas emissions
- Policy SI 3 - Energy infrastructure
- Policy SI 4 - Managing heat risk
- Policy SI 5 - Water infrastructure
- Policy SI 6 - Digital connectivity infrastructure
- Policy SI 7 - Reducing waste and supporting the circular economy
- Policy SI 8 - Waste capacity and net waste self-sufficiency
- Policy SI 12 - Flood risk management
- Policy SI 13 - Sustainable drainage
- Policy SI 17 - Protecting and enhancing London's Waterways
- Policy T1 - Strategic approach to transport
- Policy T2 - Healthy Streets
- Policy T3 - Transport capacity, connectivity and safeguarding
- Policy T4 - Assessing and mitigating transport impacts
- Policy T5 - Cycling
- Policy T6 - Car parking
- Policy T6.2 - Office parking
- Policy T6.3 - Retail parking
- Policy T6.5 - Non-residential disabled persons parking
- Policy T7 - Deliveries, servicing and construction
- Policy T9 - Funding transport infrastructure through planning

### Relevant London-level Supplementary Planning Documents/ Guidance and Strategies

62. The relevant London-level supplementary planning documents and guidance documents are as follows:
- Mayor of London: Accessible London - Achieving an Inclusive Environment (SPG, 2004)
  - Mayor of London: Climate Change Mitigation and Energy (Strategy, 2010)

- Mayor of London: Climate Change Adaptation (Strategy, 2011)
- Mayor of London: Environment Strategy (2018)
- Mayor of London: London View Management Framework (SPG, 2012)
- Mayor of London: London World Heritage Sites (SPG, 2012)
- Mayor of London: Planning for Equality and Diversity in London (SPG, 2007)
- Mayor of London: Shaping Neighbourhoods - Character and Context (SPG, 2014)
- Mayor of London: Shaping Neighbourhoods - Play and Informal Recreation (SPG, 2012)
- Mayor of London: The Control of Dust and Emissions During Construction and Demolition (SPG, 2014)
- Mayor of London: Transport (Strategy, 2018)
- Mayor of London: Use of Planning Obligations in the Funding of Crossrail (SPG, 2016)

### Core Strategy 2011

63. The Core Strategy provides the spatial planning strategy for the borough. 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 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 (saved policies)

64. With the exception of Policy 1.8 (Location of retail outside town centres), the Council resolved in 2013 to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated by the Core Strategy. Paragraph 219 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 saved policies of the Southwark Plan 2007 are:

- Policy 1.1 - Access to employment opportunities
- Policy 1.4 - Employment sites outside the POLs and PILs
- 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 management
- 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 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

### Relevant Local-level Supplementary Planning Documents

65. The relevant supplementary planning documents and guidance documents from the local development plan are as follows:
- Design and Access Statements (SPD, 2007)
  - Section 106 Planning Obligations and Community Infrastructure Levy (SPD, 2015 with 2017 Addendum)
  - Sustainability Assessment (SPD, 2009)
  - Sustainable Design and Construction (SPD, 2009)
  - Sustainable Transport (SPD, 2010)

## Relevant Conservation Area Appraisals

66. The following Conservation Area Appraisal is relevant to the site:

- Thrale Street (2012)

## **Emerging planning policy**

### New Southwark Plan

67. The New Southwark Plan (NSP) is now at an advanced stage. The NSP was submitted to the Secretary of State in January 2020. The Examination in Public (EiP) for the NSP took place between February and April 2021. The Inspectors wrote a post hearings letter on 28 May 2021 and under Section 20(7)(c) of the Planning and Compulsory Purchase Act (2004) the Council asked the Inspectors to recommend Main Modifications to ensure the Plan is sound. The Council is consulting on the Main Modifications as recommended by the Inspectors from 6 August 2021 to 24 September 2021. The Inspectors will write a report once the consultation has concluded and they have had the opportunity to consider representations.
68. It is anticipated that the plan will be adopted later in 2021 and will replace the saved policies of the Southwark Plan 2007, the Core Strategy 2011, the Aylesbury Area Action Plan 2010, the Peckham and Nunhead Area Action Plan 2014 and the Canada Water Area Action Plan 2015.
69. 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.
70. The Inspectors have heard all the evidence submitted at the Hearings and in previous stages of consultation. The Main Modifications comprise the changes to policies the Inspectors consider are needed to ensure the Plan is sound.
71. The most relevant policies of the NSP are as follows:
- Policy P12 - Design of places
  - Policy P13 - Design quality
  - Policy P15 - Designing out crime
  - Policy P16 - Tall buildings
  - Policy P17 - Efficient use of land
  - Policy P19 - Conservation areas
  - Policy P22 - Archaeology
  - Policy P23 - World heritage sites

- Policy P24 - River Thames
- Policy P27 - Access to employment and training
- Policy P28 - Strategic protected industrial land
- Policy P29 - Office and business development
- Policy P30 - Affordable workspace
- Policy P33 - Railway arches
- Policy P34 - Town and local centres
- Policy P38 - Shop fronts
- Policy P43 - Broadband and digital infrastructure
- Policy P48 - Public transport
- Policy P49 - Highway impacts
- Policy P50 - Walking
- Policy P52 - Cycling
- Policy P53 - Car parking
- Policy P54 - Parking standards for disabled people and the physically impaired
- Policy P55 - Protection of amenity
- Policy P58 - Green infrastructure
- Policy P59 - Biodiversity
- Policy P60 - Trees
- Policy P61 - Reducing waste
- Policy P63 - Contaminated land and hazardous substances
- Policy P64 - Improving air quality
- Policy P65 - Reducing noise pollution and enhancing soundscapes
- Policy P67 - Reducing flood risk
- Policy P68 - Sustainability standards

### Site allocation

72. The NSP includes a number of 'Site Allocations'. Site Allocations are detailed development management policies specific to particular potential redevelopment sites in the borough. They specify, among other things, the land uses and development capacity of those sites. The application site, together with adjacent Red Lion Court, is subject to draft Site Allocation NSP05. This is discussed in more detail in the 'Principle of Development' section of this report.

### Summary on emerging policy

73. 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 London Plan 2021.

74. In line with paragraph 48 of the NPPF, as the NSP is at an advanced stage, it can be afforded some material weight and this is detailed in the report where relevant to particular policy issues.

## ASSESSMENT

### Consultation summary

75. Consultation with members of the public was conducted in March 2021. The table below summarises the representations received during this period:

<b><u>Consultation responses: Summary table</u></b>		
No. of representations: <b>6</b>	No. of unique representations: <b>6</b>	
Of the unique representations:		
In objection: <b>2</b>	Neutral: <b>1</b>	In support: <b>3</b>

76. A letter from Better Bankside is included in the above table as a public representation rather than a consultee response. It has been treated as a 'neutral' representation.
77. The table below summarises the issues of concern raised by the consultation responses (from supporters, objectors and those taking a neutral position) along with the total number of times each reason was raised:

<b><u>Planning Objections: Summary Table</u></b>	
<b>Reason</b>	<b>No. of times raised</b>
<b><u>Design</u></b>	
Proposal would be of an excessive height.	1
Proposal would harm Borough Views 1 and 2.	1
<b><u>Land Use</u></b>	
No retail / leisure / bars or restaurants should be permitted alongside Southwark Bridge in the arches.	1

<u>Amenity Impacts</u>	
The southern roof terrace will create overlooking and associated privacy infringement for nearby residents.	2
Construction will create air pollution / dust.	1
Construction will create noise.	1
The construction programme should prioritise, and seek to minimise the duration of, the works to the south façade in order to reduce amenity disruption to the nearby residents.	1
Pedestrians and the retail unit on the Thames Path will create noise.	1
<u>Transport</u>	
Cyclists approaching the site from the north, south and west would be required to take a circuitous route in order to access the cycle store.	1
There would be no dropped kerb on Park Street to enable safe and easy access from the highway and into the pocket park for cyclists.	1
Expecting cyclists to dismount before moving through the pocket park is unrealistic.	1
Outside of the opening hours of the pocket park, site employees would be unable to gain access to the cycle store.	1
The location of the short stay cycle parking for the new retail unit is unclear.	1
The location of the short stay cycle parking within the pocket park is illogical, given that the pocket park is closed in the evenings.	1
Access should be retained from Southwark Bridge Road to the building itself as well as to Park Street.	1
Car parking under Southwark Bridge should be removed/reconfigured in order to provide a more generous pavement width on Park Street.	1
The new crossover for access to the internal loading yard will result in a net increase of one vehicle access point across the Park Street footway, the pedestrian and public realm impacts of which need to be mitigated.	
The number of delivery/servicing trips estimated by the applicant is not robust and is an underestimate.	1
The potential servicing trips for the commercial use of the railway arches has not been taken into consideration in the DSP.	1
The proposed delivery and servicing hours are not neighbourly.	1
Deliveries by all vehicle types should not be allowed between 7am-9am and 4pm-6pm.	1
Personal staff deliveries to the office would generate additional trips, and should not be permitted other than in exceptional	1

circumstances.	
An off-site consolidation centre should be used.	1
<u>Public Space, Greening and Landscaping</u>	
Hours of public access should be expanded (7am-9pm would be more appropriate than the applicant's proposed hours of 8am-8pm).	1
The stepped/ramped interface between the pocket park and the Thames Path would not help draw people into, through and out of the pocket park. It would be preferable for the gradient/ramping to be closer to the Park Street (southern) side of the pocket park, allowing for a level threshold on the Thames Path (northern) side.	1
The application does not adequately address how the pocket park would work with and without the redevelopment of Red Lion Court being brought forward.	1
The developer has not committed to removing the fence along the site's eastern boundary in the event that Red Lion Court is redeveloped to provide additional space to accompany the pocket park.	1
Insufficient detail about the management of the public realm, including how joint/unified management would work if additional public realm was to be brought forward as part of the future redevelopment of Red Lion Court.	2
The proposed use of a Mobile Elevated Work Platform for maintenance of the building could, if not carefully controlled, cause disruption for users of the pocket park during operational hours and when it is closed for private events.	1
Use of outdoor spaces and terraces during the evenings and at weekends is unacceptable.	1
<u>Environmental Impacts</u>	
Construction activities/traffic will cause congestion and/or disturbance.	1
Construction activities/traffic must be during sociable/daytime hours.	1
<u>Developer Approach And Community Engagement</u>	
Developer has not agreed to set up a co-ordination group with the owner of Red Lion Court in order to consult and coordinate on matters such as servicing, design and maintenance of the potential unified public realm space between the two schemes.	1
Developer must make meaningful efforts to engage with residents throughout the construction process.	1

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78. The issues raised by these objections are dealt with in the subsequent parts of this report.
79. The main reasons for support raised by the public comments are:
- developer's commitment to work with neighbouring businesses and organisations to minimise the number of deliveries and motorised trips associated with the proposal;
  - provision of additional urban greening, ecological enhancements at roof level and the inclusion of habitat elements such as bird boxes;
  - provision of additional outside space for residents and visitors;
  - enhanced permeability from the riverside; and
  - high quality proposed materials and planting.

### **Environmental impact assessment**

80. The applicant did not make a Screening Opinion request to the Council as to whether the proposed development, due to its proposed size and scale, would necessitate an Environmental Impact Assessment (EIA).
81. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 set out the circumstances in which development must be underpinned by an EIA. Schedule 1 of the Regulations sets out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development types for which an EIA might be required due to the potential for significant environmental impacts to arise. Schedule 3 sets out that the significance of any impact should include consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.
82. The range of developments covered by Schedule 2 includes 'Urban development projects' where:
- the area of the development exceeds 1 hectare and the proposal is not dwellinghouse development; or
  - the site area exceeds 5 hectares.
83. The application site is 0.54 hectares and as such the proposal does not exceed the Schedule 2 threshold.
84. Consideration, however, should still be given to the scale, location or nature of development, cumulative impacts and whether these or anything else are likely to give rise to significant environmental impacts. Planning application 21/AP/0599 proposes the modification and extension of an existing office

building to provide an office-led development rising to a maximum height of 34.3 metres above ground level. Its scale is appropriate to its urban setting and it is unlikely to give rise to any significant environmental impacts.

85. For the above reasons, an EIA is not required in respect of the proposed development.

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

### Existing lawful land use

86. The existing building is currently vacant, having been occupied up until 2019 by news and media outlet the Financial Times. The lawful existing use of the building all land within its curtilage is, therefore, Class E [Commercial, Business and Service]. More specifically, it falls within the Class E(g)(i) sub- category [Offices to carry out any operational or administrative functions].

### Designations

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

87. The London Plan designates Bankside, Borough and London Bridge as one of twelve Opportunity Areas in Central London. It notes that this particular Opportunity Area holds considerable potential for intensification and scope to further develop its strategic office provision. This is reflected in Policy SD1 (Opportunity Areas), which sets a target of 5,500 new jobs over the next 20 years.
88. Strategic Targets Policy 2 of the Core Strategy, which underpins the London Plan, sets out Southwark's vision for Bankside, Borough and London Bridge. Its key aims are to continue to provide high quality office accommodation and retail uses, along with approximately 25,000 jobs by the year 2026. Additionally, Strategic Policy 10 states that between 400,000 square metres and 500,000 square metres of additional business floorspace will be provided within the Opportunity Area to help meet central London's need for office space.
89. In terms of the emerging policy position, Policy SP1b of the NSP states that most new development will happen in the Opportunity Areas and ActionAreas, with Policy SP4 viewing them as the key locations for yielding new employment opportunities. Policy P29 of the emerging Plan states that opportunity areas should evolve to incorporate new types of flexible business workspace and accommodate sectors such as the creative and cultural industries and the digital economy.



Central Activities Zone

90. The site is located within the CAZ which covers a number of central London boroughs and is London's geographic, economic, and administrative core. The London Plan, and in particular Policy SD1, recognises the well-established long term demand for office space within the CAZ and promotes office provision within this policy area.
91. Strategic Targets Policy 2 of the Core Strategy requires development in the CAZ to support the continued success of London as a world-class city while also 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.

London Bridge District Town Centre

92. As well as being within the CAZ, the site is part of the London Bridge District Town Centre. Saved Policy 1.7 (Development Within Town and Local Centres) of the Southwark Plan states that within the town 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.
93. With respect to emerging policy, the NSP sets out strategic targets over the next 20 years to deliver at least 460,000 square metres of new office space in Central Activity Zones and in town centres along with at least 84,000 new jobs. In the Central Activities Zone and town centres, Policy P29 of the NSP expects development proposals to retain or increase the amount of employment floorspace on site.

Bankside, Borough and London Bridge Strategic Cultural Area

94. The application site lies within the Bankside, Borough and London Bridge Strategic Cultural Area. Strategic Cultural Areas have been designated in order to protect and enhance the provision of arts, culture and tourism uses. Development of the tourism sector has significant local economic benefits through employment, regeneration and visitor spending in other local businesses. While the proposed development does not include any visitor facilities the new and improved publicly-accessible spaces will be of value to visitors, and as such the designation and applicable policies are relevant considerations in the determination of this application.

Emerging Bankside and Borough Area Vision

95. The NSP includes a Vision Area for Bankside and the Borough, a designation

which the application site falls within. Over the next 20 years, the Area Vision is for new development to deliver over 34,000 square metres of business/office floorspace alongside over 8,000 square metres of retail, leisure and community uses. The Area Vision states that development in Bankside and The Borough should:

- continue to consolidate this area's role within Central London as an international destination for business headquarters, small businesses and tourism that is entwined with local services and open spaces;
- increase or improve the number and quality of local open spaces, squares and public realm;
- improve existing and create new cycle routes, including the Thames Path.

#### Assessment of conformity with designations

96. The principle of refurbishment and extension of an existing building to provide modern and fit-for-purpose office and retail uses would support the role and functioning of the Central Activities Zone and the London Bridge District Town Centre. It is also consistent with the policies for the Opportunity Area and the NSP Area Vision, and in delivering new high quality publicly-accessible spaces in this area popular with tourists, the proposal also meets the aims and requirements of the Bankside, Borough and London Bridge Strategic Cultural Area.
97. The conformity of the proposal with the emerging site allocation is discussed below, and thereafter the acceptability of each use is considered in turn.

#### Draft site allocation

##### Background to NSP Site Allocation NSP05

98. Together with Red Lion Court located immediately to the east, the application site forms draft site allocation NSP05 under the emerging NSP. Specifically with respect to land uses, the allocation requires redevelopment of the two sites to:
- provide at least the amount of employment (office/business) floorspace on the site or provide at least 50% of the development as employment (office/business) floorspace, whichever is greater; and
  - enhance the Thames Path by providing active frontages with ground floor town centre uses (shops, food and drink, and/or community).
99. The allocation sets out an expectation that new development should deliver new homes, in line with the indicative residential capacity of 261 homes.

100. With regard to public space requirements, the allocation states that any redevelopment must:

- enhance the Thames Path by providing public realm and active frontages;
- provide new north-to-south green links; and
- provide new open space of at least 15% of the site area.

#### Assessment of conformity with draft site allocation

101. It is recognised that the proposal would not deliver any housing. The refurbishment of the existing building, which is supported as a sustainable re-use of the structure, would make it difficult to incorporate housing.

102. The application retains the existing office space and provides an uplift in office space of 7,790 square metres GIA. The total floorspace uplift across all uses (i.e. office and retail) would be 7,884 square metres GIA. This uplift of employment floorspace and the creation of a new retail/café unit facing the Thames Path is consistent with the land use expectations of the allocation.

103. The proposal also responds positively to the open space requirements of the allocation, providing a pocket park and the West Urban Street. Together, these open spaces would cover 25% of the site, thereby exceeding the 15% minimum requirement.

104. In summary, the proposed mix of uses responds appropriately to the spirit and regeneration objectives of the site allocation. The following section of this report assesses the mix of uses for conformity with the relevant policies of the adopted development plan and emerging NSP.

#### Proposed mix of uses

##### Office Use

105. In order to support the vibrancy and vitality of the CAZ, London Plan policies SD4 and SD5 promote mixed use development, including housing, alongside increases in office floorspace. Policy SD5 is clear, however, that new residential development should not compromise the strategic functions of the CAZ. The Mayor's Central Activities Zone SPG contains additional guidance on maintaining an appropriate mix of uses within the CAZ, setting out the weight that should be afforded to office use and CAZ strategic functions relative to residential.

106. Strategic Policy 10 of the Core Strategy, Saved Policy 1.4 of the Southwark Plan and emerging Policy P26 of the New Southwark Plan identify sites within

the CAZ and Opportunity Areas as appropriate for accommodating the significant growth needed to meet business demand. Together, these policies require development proposals at the very least to maintain, but where possible increase, existing levels of business floor space. Proposals should also bring forward a mix of other complimentary uses as well as residential to enhance the offer, vitality and long term vibrancy of central London.

107. This application proposes the delivery of a substantial quantum of new and improved office floor space, which is welcome in principle. Complementing the office floorspace would be affordable workspace. This is entirely appropriate for this central London location.



*Figure 09: View of the ground floor reception area of the office, where it fronts onto the West Urban Street*

108. It is recognised that the proposal would not incorporate any housing. However, a refurbishment and extension of the existing building is proposed rather than wholesale redevelopment. The format of the building is not well suited to accommodating residential uses and their attendant amenity requirements alongside the retained office space.
109. In summary, the principle of redeveloping the existing building to provide additional offices is supported in this location. The extended building could provide around 2,600 jobs. The applicant is the building owner WPP, who work from a number of buildings in the borough, and will shortly be moving into the refurbished Rose Court, opposite. The consolidation of their business in Southwark is welcome.

## Affordable workspace

110. Policy E2 of the London Plan requires large-scale development proposals to incorporate flexible workspace suitable for micro, small and medium sized enterprises. Policy E3 deals specifically with affordable workspace. The policy states “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 purpose”. 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.
111. Policy P30 of the emerging New Southwark Plan deals with affordable workspace. Criterion 2 of the policy requires major development proposals to deliver at least 10% of the gross new employment 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, the nature of local demand and existing/proposed uses. As set out in Clause 5 of the policy, for extensions to buildings or changes of use, the policy applies to the new floorspace created if the extension or change of use is over 500 square metres.
112. The total quantum of proposed market and affordable office floorspace within the development is 25,635 square metres GIA. The gross new office floorspace would be 7,790 square metres GIA. Under the terms of Policy P30, 10% of new office floorspace within the proposed development should be dedicated as ‘affordable workspace’. Set out below is a schedule of the applicant’s proposed affordable workspace offer:

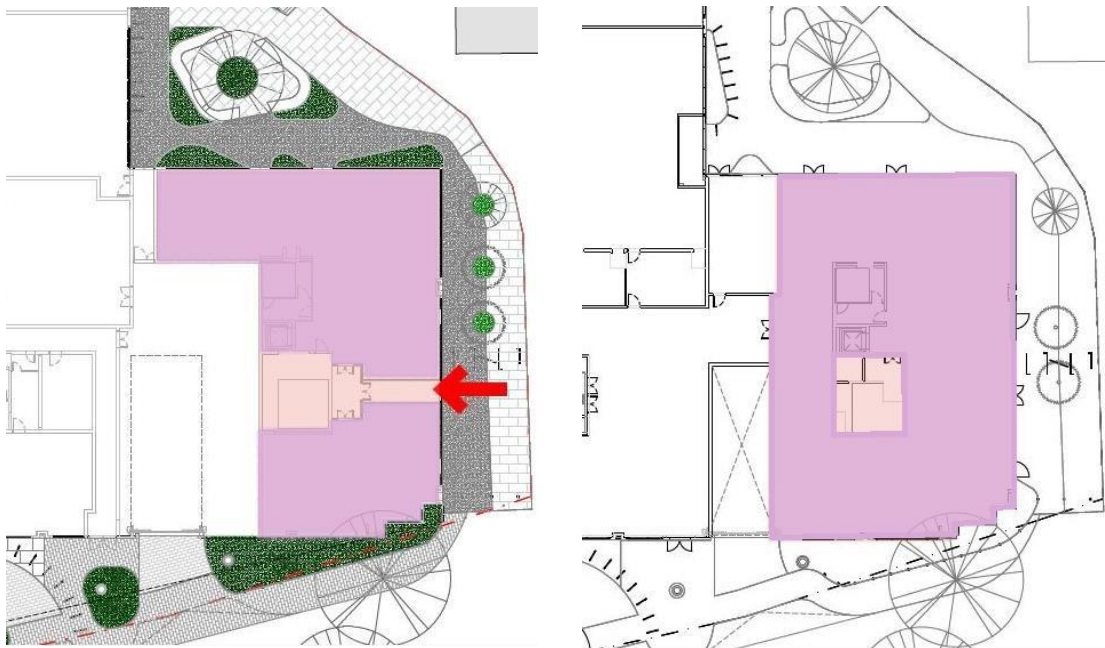
<b>Affordable workspace: summary table</b>		
<b>Dedicated Class E space</b>		
<u>Unit reference and description</u>	<u>Floor</u>	<u>GIA (square metres)</u>
Ground Floor Unit (North)	Level 00	207.0
Ground Floor Unit (South)	Level 00	99.0
First Floor Unit	Level 01	382.0
Ancillary facilities (including proportion of facilities shared with market rate floorspace)	Levels 00-01	89.7
Total GIA of all Affordable Workspace:		777.7

Total GIA of the uplift in office affordable floorspace:	7,790
<b>Affordable Workspace as a percentage of the uplift in office floorspace on the site</b>	<b>10.0%</b>

113. As the above table shows, the proposed quantum of affordable workspace meets the spatial requirements of Policy P30. To ensure flexibility and to appeal to a wide range of prospective tenants, the units have been provided in a variety of sizes and at different levels of the development.

114. 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 peppercorn rent for months 0-11, and then from 12 months until the end of the affordable workspace lifetime at no more than 75% Local Open Market Rent for equivalent space;
- no more than 50% of the market rate office floorspace can be occupied until the affordable workspace has been fitted-out to the agreed specification ready for occupation;
- a Full Management Plan and a Full Marketing Strategy, both to be secured in advance of the marketing period and first operation of the workspace;
- the service charges payable by the tenant will be capped; and
- the rates payable by the tenant will be capped.



*Figures 10 (above left) and 11 (above right): Layout of the ground and first floors of the proposed development, with the three units identified in purple and the centralised communal/circulation space in peach. The main entrance*

*to the units is shown by the red arrow.*

## Retail

115. Policy SD4 of the London Plan sets out a strategic priority to support the vitality, viability, adaption and diversification of Borough and Bankside, as a CAZ Retail Cluster, through retail and related uses. Together, policies E9 and SD7 of the London Plan 2021 provide support for essential convenience retail and specialist shopping in District Town Centres.
116. At the borough level, the Core Strategy 2011 and Southwark Plan 2007 provide support for realising the CAZ's potential as a centre for leisure, retail and culture. With respect to emerging policy, Policy P34 of the NSP sets out retail requirements in the context of the evolving role of District Town Centres, requiring new development to provide an active use at ground floor level in locations with high footfalls. The draft NSP site allocation NSP05 expects any development of this site to provide town centre uses on the Thames Path.
117. The application would improve activation along the Thames Path by redesigning the frontage and creating a flexible retail/café unit fronting the Thames Path and wrapping round to the new street to the west, capable of operating as a separate entity to the office building. This accords with development plan policies and aspirations for the area, and as such is considered a benefit of the scheme.



*Figure 12: Evening view of the retail unit from the Thames Path.*



### Conclusion on principle of development

118. The principle of refurbishing, updating and extending the existing building makes good use of the existing structure, and use predominately for offices complies with the policies of the development plan, as well as the policies and site allocation in the New Southwark Plan. The introduction of a retail or café unit onto the Thames Path would activate this busy area, supporting the visitor and working populations. As such, the principle of the development, in land use terms, is supported.

### **Privacy, outlook, noise and odour impacts on nearby residential occupiers**

#### Policy background

119. Strategic Policy 13 of the Core Strategy 2011 seeks to ensure that all development sets high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work. Saved Policy 3.2 of the Southwark Plan 2007 states that permission will not be granted for developments where a loss of amenity, including disturbance from noise, would be caused. The Council's Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.
120. Within the vicinity of the site, there are four clusters of residential uses susceptible to any privacy, outlook, noise and odour impacts from the proposed development. They are:
- Nos. 81-87 Park Street;
  - Nos. 88-89 Park Street;
  - 123 Porter Street (1-53 Old Theatre Court);
  - 3-13 Southwark Bridge Road (Anchor Terrace).
121. The relationship of these properties to the application site is shown below:



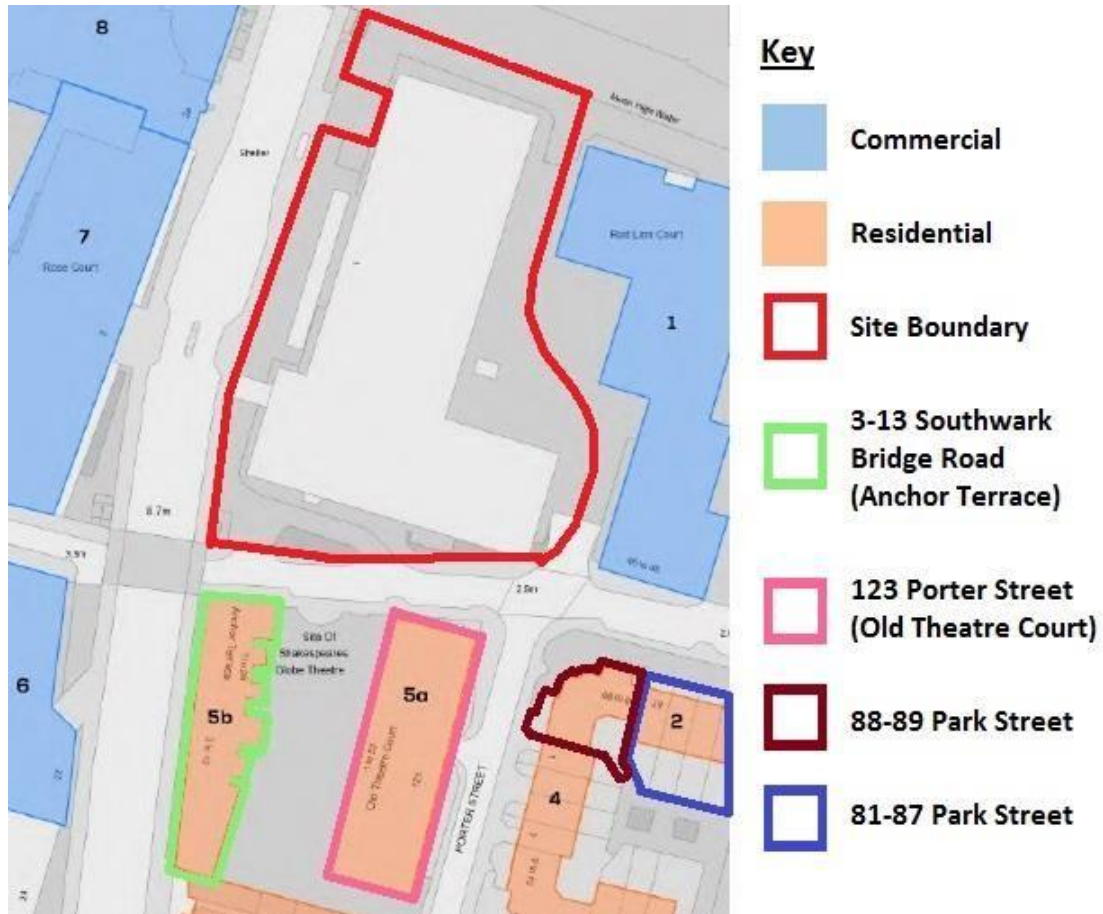


Figure 13: Site location plan with the surrounding sensitive residential buildings clustered into four groups, each edged in a different colour. The application site is shown edged in red.

122. By reason of their distance and/or the physical and visual separation provided by intervening buildings, no other surrounding existing dwellings would be at risk of privacy, outlook, noise or odour harm. As such, only those highlighted in the above map will be given further consideration.

### Privacy

123. In order to prevent harmful overlooking, the 2015 Technical Update to the Residential Design Standards SPD 2011 requires developments to achieve:
- a distance of 12 metres between windows on a highway-fronting elevation and those opposite at existing buildings, and;
  - a distance of 21 metres between windows on a rear elevation and those opposite at existing buildings.
124. The above rules are principally designed to apply where the 'facing' buildings are both in residential use.

### Assessment

125. The re-use of the existing building and extensions means that established relationships with many of the surrounding properties would largely be unaffected. While the extensions on the southern side of the buildings would create a more intensive relationship to the north elevation of Anchor Terrace, in which there are a number of habitable room windows, the closest window-to-window separation distance would be 12.5 metres. It is also relevant to note that the recommended 12 metre separation distance for windows facing each other across a highway can be applied more flexibly where one of the buildings is not in residential use. Taking account of this flexibility, and with the 12 metre minimum separation distance recommended by the Council's Residential Design Standards SPD being exceeded in all cases, it can be concluded that no harmful overlooking of the Anchor Terrace properties would result from the proposal.
126. With respect to the other three clusters of nearby existing residential buildings, separation distances well in excess of the minimum 12 metre requirement would be maintained, with the closest approximate distance in each case being:
- 123 Porter Street (Old Theatre Court) – 14 metres;
  - 88-89 Park Street – 25 metres; and
  - 81-87 Park Street – 36 metres.
127. With respect to the future context, and as mentioned in an earlier part of this report, the site forms part of an NSP site allocation with Red Lion Court to the east identified as having the potential to deliver new housing. Proposed infilling and footprint enlargement works along the subject building's eastern edges would bring the massing closer to the boundary line shared with Red Lion Court. Despite this, a good-sized central space would remain, with the separation distance to the common boundary line widening from a pinch point of 4 metres to a maximum of 25 metres. Trusting that any proposal on the Red Lion Court mirrors the configuration, a pocket park would be formed between the two buildings, creating generous building-to-building separation distances that would achieve good levels of privacy for any dwellings within the Red Lion Court scheme. As such, the proposal's scale and relationship to the boundary line would not hamper the ability to achieve the requisite amenity levels for any future housing on the adjoining land.

### Conclusion on privacy impacts

128. In summary, the development would not give rise to an unacceptable level of overlooking of existing or proposed residential uses in the surrounding area.

### Outlook and sense of enclosure

129. In the existing context, the residential buildings from which the proposed development would be seen most prominently are Anchor Terrace, 123 Porter Street and 88-89 Park Street. Should the adjoining Red Lion Court site be brought forward for residential development in the future, any west-facing dwellings within such a scheme may have their outlook affected by the proposed development.
130. Although the proposed separation distance from Anchor Terrace and 123 Porter Street would make for a relatively intense relationship between facing buildings, it is not uncommon in central London. The site-facing windows at Anchor Terrace would still be able to obtain oblique views north-westwards across Southwark Bridge Road and towards Rose Court, while at 123 Porter Street the only habitable room windows are at fifth floor level and thus would continue to from a good quality of outlook and generous views of the sky. The extended and refurbished building would be of high architectural quality and improve the appearance of the site, which would bring some outlook benefits to the occupiers of Anchor Terrace and 123 Porter Street.
131. In addition to being located a good distance to the southwest of the site, the properties at 88-89 Park Street and 81-87 Park Street are oriented askew to it. For these reasons, despite the proposed increased height of the building and enlargement of its footprint around the south and east edges, a good quality of outlook and sense of openness would be preserved for these nearby occupiers.
132. For the same reasons given in the 'Privacy' section of this report, the proposal would play its role in establishing a neighbourly building-to-building relationship along the eastern side of the site. There is no reason, therefore, that the resulting increase to the building's footprint and height should hamper the ability to achieve a reasonable quality of outlook and sense of openness for any future housing on the adjoining Red Lion Court site.

### Conclusion on outlook and sense of openness impacts

133. In conclusion, it is not considered that any of the surrounding dwellings which look towards the site would experience a harmfully diminished quality of outlook or sense of openness as a result of the proposed development.

### Noise

134. The application was accompanied by a Noise Impact Assessment which details measures for mitigating noise and disturbance from plant (power, heating and cooling machinery), other equipment, the various commercial uses within the proposed building and the commercial terraces. The Council's

Environmental Protection Team has reviewed the Noise Impact Assessment.

#### Plant noise

135. A basement-level plant room and a rooftop plant are proposed. Although the plant specifications have yet to be finalised, and therefore the plant noise levels are not known, the Noise Impact Assessment identifies appropriate forms of sound abatement, such as acoustic louvres and screens. The Environmental Protection Team is satisfied with the Noise Impact Assessment and its conclusions. To ensure the installed plant and its acoustic enclosure is of an adequate specification, an attenuation condition is recommended.

#### Public noise nuisance

136. The Noise Impact Assessment suggests that, at part of pre-application consultation with local residents, concerns were raised regarding the noise impact of the proposed pocket park. No such concerns have been raised by the six public representations received in response to the Council's public consultation conducted as part of the planning application process. Notwithstanding, it is recognised that the pocket park is largely screened from the Thames Path and Park Street, and as such could attract antisocial behaviour at night. To address this, on all days of the week it is proposed to shut the gates at the pocket park's two entry points between at 9pm and re-open them at 7am the following day. This would secure a good level of daytime public access while guarding against the risk of public noise nuisance, and will be secured by condition.

#### Roof terraces

137. With respect to noise from the roof terraces, both of which are ancillary to the office, the applicant's assessment accounts for sound from people and music, applying a typical cafe scenario modelled on the industry baseline. Having reviewed this, the Environmental Protection Team has requested that:

- the terrace on the southern side of the building ceases use no later than 22:00 each day;
- the terrace on the northern side (which faces towards the Thames and so away from the nearest residential properties) ceases slightly later at 23:00 each day.

#### Conclusion on noise

138. In summary, and having given regard to the predominantly commercial environment to the north of the site and the more residential character to the south, the Environmental Protection Team is satisfied that no unacceptable noise or disturbance would arise from the range of uses proposed, their

associated plant requirements and the proposed publicly-accessible spaces. This is subject to conditions relating to noise attenuation, the operational hours of the flexible retail/café unit, and the hours of use of the rooftop terraces and pocket park.

### Odour

139. To protect the surrounding dwellings from odour disturbance, a condition is recommended requiring the Local Planning Authority's approval of a scheme of extraction and ventilation for any food preparation uses within the development.

## **Daylight, sunlight and overshadowing impacts on nearby residential occupiers**

### Daylight

140. The BRE Guidance sets out the rationale for testing the daylight impacts of new development through various tests. The first and most readily adopted test prescribed by the BRE Guidelines is the Vertical Sky Component assessment (VSC). 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 approximately 20% of the original value before the loss is noticeable.
141. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method, which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight may be affected.

### Properties assessed for daylight impacts

142. This planning application was accompanied by a daylight and sunlight assessment undertaken in accordance with the BRE guidelines. The document assesses the extent to which the proposed development would affect the dwellings in the following buildings:
- 1) Nos. 81-87 Park Street;
  - 2) Nos. 88-89 Park Street;
  - 3) 123 Porter Street (1-53 Old Theatre Court);
  - 4) 3-13 Southwark Bridge Road (Anchor Terrace).

143. For ease of reference, re-provided below is the map of residential buildings showing their relationship to the application site:

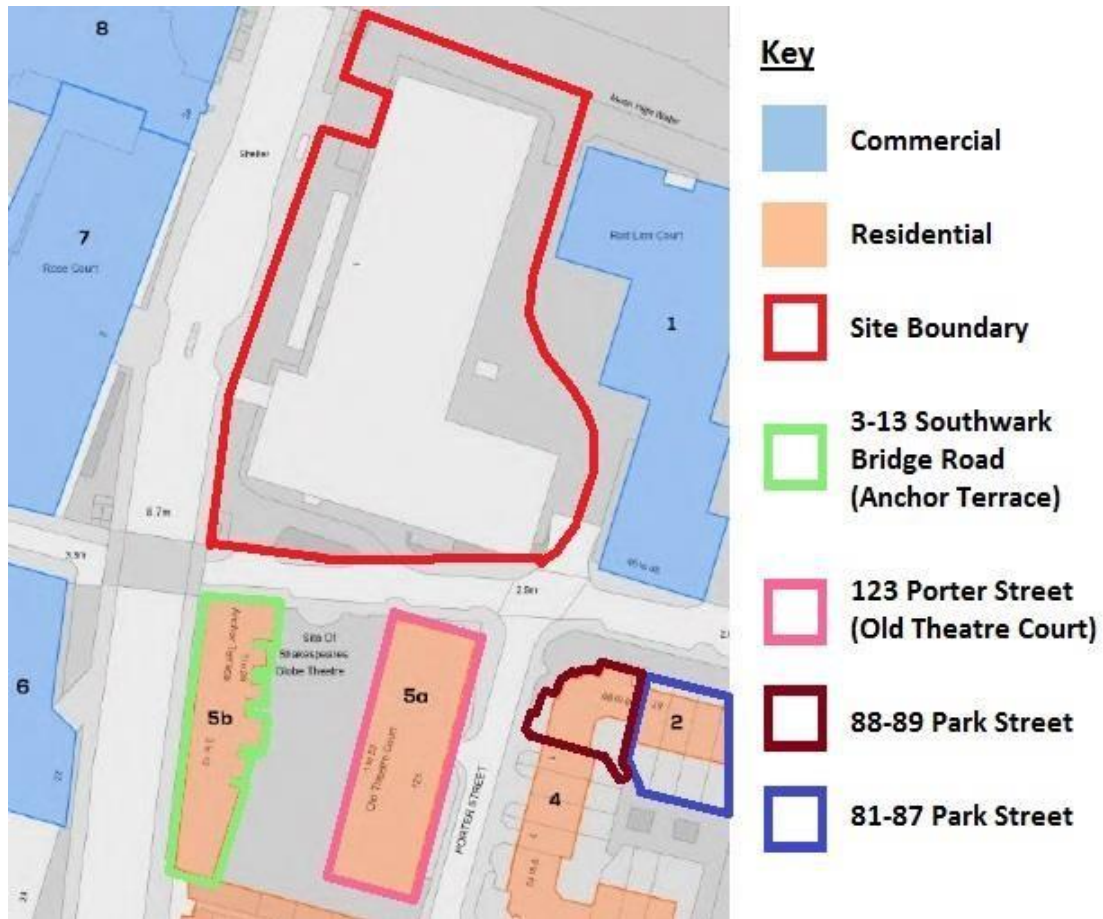


Figure 14: Site location plan with the surrounding sensitive residential buildings clustered into four groups, each edged in a different colour. The application site is shown edged in red.

#### Summary of VSC impacts for sensitive surrounding residential properties

144. The table below summarises the VSC impacts to surrounding properties as a result of the proposed development being built-out in the present day context (i.e. an 'existing vs proposed' scenario):

Property	Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
<b>81-87 Park Street</b>				
Total no. habitable windows tested: 27				
<ul style="list-style-type: none"> <li>Of the 27 windows, none would retain a VSC of 27% or more.</li> <li>The distribution of percentage reductions of these <u>27</u> windows is:</li> </ul>				
Proposed vs existing	27	0	0	0
<b>88-89 Park Street</b>				
Total no. habitable room windows tested: 18				
<ul style="list-style-type: none"> <li>Of the 18 windows, 17 would retain a VSC of 27% or more.</li> <li>For the <u>1</u> that would not, the distribution of percentage reductions is:</li> </ul>				
Proposed vs existing	0	0	0	1
<b>123 Porter Street (1-53 Old Theatre Court)</b>				
Total no. habitable room windows tested: 48				
<ul style="list-style-type: none"> <li>Of the 48 windows, 12 would retain a VSC of 27% or more.</li> <li>For the <u>36</u> that would not, the distribution of percentage reductions is:</li> </ul>				
Proposed vs existing	33	3	0	0
<b>3-13 Southwark Bridge Road (Anchor Terrace)</b>				
Total no. habitable room windows tested: 44				
<ul style="list-style-type: none"> <li>Of the 44 windows, 16 would retain a VSC of 27% or more.</li> <li>For the <u>28</u> that would not, the distribution of percentage reductions is:</li> </ul>				
Proposed vs existing	26	2	0	0

Summary of NSL impacts for sensitive surrounding residential properties

145. The table below summarises the NSL (also known as 'daylight distribution') impacts to surrounding properties as a result of the proposed development being built-out in the present day context (i.e. an 'existing vs proposed' scenario):

Property	No. windows that would experience a reduction in NSL (as a percentage of the baseline NSL value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
<b>81-87 Park Street</b>				
Total no. habitable rooms tested: 27				
Proposed vs existing	27	0	0	0
<b>88-89 Park Street</b>				
Total no. habitable rooms tested: 12				
Proposed vs existing	10	2	0	0
<b>123 Porter Street (1-53 Old Theatre Court)</b>				
Total no. habitable rooms tested: 32				
Proposed vs existing	32	0	0	0
<b>3-13 Southwark Bridge Road (Anchor Terrace)</b>				
Total no. habitable rooms tested: 30				
Proposed vs existing	30	0	0	0

Impact on 81-87 Park Street

146. The daylight testing shows the proposed development would retain reasonable levels of VSC and NSL for the properties at 81-87 Park Street.



Impact on 88-89 Park Street

147. All habitable room windows at 88-89 Park Street would retain BRE compliant levels of VSC with one exception, where a substantial adverse reduction would occur. This loss would be experienced by a first floor window, set back within a recessed balcony, which serves a room that receives a very low existing absolute VSC of 0.1%. This would reduce to an absolute VSC of 0% as a result of the proposed development, causing a percentage reduction of 100%. However, because the existing absolute VSC is extremely low, the 100% loss arising from the development is not an accurate representation of how the change would be perceived by users of the rooms. In reality, the window received such a low level of light that there would be no perceptible change to room users.
148. With respect to NSL impact on the 88-89 Park Street properties, the results – which are based on assumptions about the internal layout of these dwellings, and as such should only be given limited weight– show two rooms (one at ground and one at second floor level) would experience a minor adverse impact. The reductions in the area of the room from which sky can be observed would be 22.2% and 24.5%. While it is recognised that the occupiers of these rooms would experience some impact, in both cases a reasonable proportion of the room would continue to benefit from sky visibility such that there would be no significant harm to residential amenity.

Impact on 123 Porter Street (1-53 Old Theatre Court)

149. The three windows to experience minor adverse losses serve the first floor west facing flat at Old Theatre Court. Sales particulars obtained from the Internet suggest the windows, despite their small size, serve an open-plan living/kitchen/diner. As such, they must be treated as habitable room windows.
150. In terms of VSC percentage loss, the windows would undergo reductions of 21.7% (at Window 8), 21% (at Window 9) and 21.4% (at Window 10). All of these losses are at lower end of the minor adverse impact range.
151. Moreover, the existing absolute VSC levels are presently relatively low, and thus any further reduction has the effect of producing large percentage losses that do not necessarily reflect the degree of change the occupiers would experience. As such, comparing the existing and proposed absolute VSC levels is a more helpful metric in understanding the degree of change. The absolute VSC reductions would be 11.5% to 9.0% (at Window 8), 11.9% to 9.4% (at Window 9), and 9.8% to 7.7% (at Window 10).
152. Taking into account small size of these windows (and thus the limited daylight they provide to the interior spaces), their secondary role to the other much

larger windows which serve the host rooms, and the fact that the NSL of the rooms would not incur a loss in excess of the BRE guidance, it is considered the VSC losses would not cause unacceptable amenity harm to the occupiers of this flat.

#### Impact on 3-13 Southwark Bridge Road (Anchor Terrace)

153. The two windows to experience minor VSC losses are in the flank (north) elevation of Anchor Terrace. One is at first floor level and one is at second floor level. The VSC percentage losses would be 20.1% and 20.7%, both of which are only marginally above a 20% change, which the BRE Guidelines deem to be imperceptible to an occupant. The change in absolute VSC would be 14.1% to 11.1% at the first floor window and 15.9% to 12.7% at the second floor window. These absolute VSC losses would, similarly to the minor adverse impacts at Old Theatre Court, have a noticeable but not harmful impact on the amenity of the occupiers.

#### Conclusion on daylight

154. It is recognised that the proposed development would cause daylight impacts in excess of the BRE guidance to a small number of the surrounding properties. However, in all but one instance these reduction are within the 'minor adverse loss' range and in many cases only marginally above a 20% change, which the BRE Guidelines consider would have no harmful impact to the users of the room. The one substantial adverse VSC loss would affect a window that currently experiences an extremely low level of daylight such that the change would be imperceptible to the users of the room.

#### Sunlight

155. In terms of sunlight, all site facing windows within the neighbouring residential properties do not face within 90 degrees of due south and therefore are not relevant for assessment, as per the BRE Guidelines.

#### Overshadowing

156. There are no private amenity spaces within sufficient proximity of the application site to warrant overshadowing testing.

#### **Design**

157. Paragraph 56 of the NPPF stresses the importance of good design, considering it to be a key aspect of sustainable development.
158. Chapter 3 of the London Plan 2021 deals with design related matters. Policy D3 promotes a design-led approach to making the best use of land. Policies

D4 and D8 build on this, setting out the design principles for ensuring new development makes a positive contribution in terms of architecture, public realm, streetscape and cityscape. Policy HC1 advises that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.

159. The relevant borough-level design and conservation policies are Strategic Policy 12 of the Core Strategy 2011 and Saved Policies 3.12, 3.13, 3.18 and 3.20 of the Southwark Plan 2007. 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 strategic and local townscape views.

### Context and assessment of existing building's value

160. As explained in the introduction to this report, the site sits within a commercial stretch of the riverfront with similar large-scale office buildings as neighbours on either side. Red Lion Court neighbours to the east with its 1980s traditional brickwork design with gabled pitched roofs; whilst the Rose Court building sits just beyond Southwark Bridge to the west, originally constructed with dark red stone cladding and recently refurbished. The wider area contains a mix of uses and buildings of different periods and scales, particularly to the east, which includes the Grade II listed Anchor pub and Victorian warehouses beyond the Cannon Street railway bridge. The Grade II listed Anchor Terrace is immediately to the south of the site, as is the 1990s low-rise residential estate in Park Street/Porter Street/Maiden Lane. The site is not listed and is outside a conservation area, but is adjacent to the Thrale Street conservation area, which includes Anchor Terrace as its boundary. The Rose Court building and Anchor Terrace are sensitive sites being above scheduled monument, whilst the application site is within protected London panoramas and viewing corridors for One Tree Hill and Nunhead Cemetery.

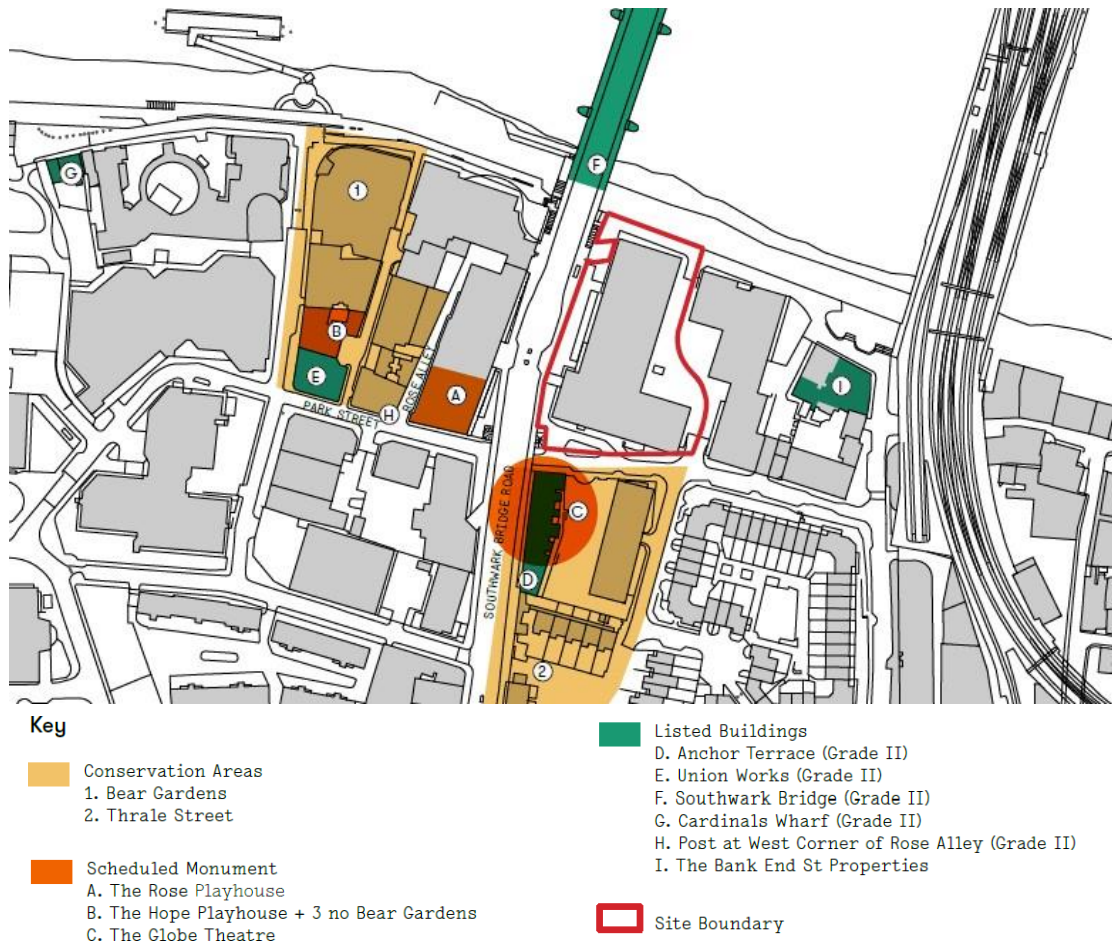


Figure 15 (above): Site location plan with nearby heritage assets highlighted.

161. The existing building is noted for its muscular, 1980s architecture comprising heavy U-shaped columns that form an exoskeleton, containing a large dark glazed volume and supporting a dark glazed volume above, but more notable for the distinctive, illuminated FT logos at high level.
162. While being a notable commercial building on the riverfront, the building is not regarded as a non-designated heritage asset. Its architecture is of its period and sits awkwardly in its context and poorly engages with the public realm, whilst its historic/ social interest as the headquarters of the Financial Times was relatively short-lived. The development presents a good opportunity to improve the building's architectural and urban design qualities.

### Height, scale and massing

163. The current building comprises six raised storeys onto the Thames Path and seven storeys onto Park Street. In most views the building's height is defined chiefly by its top storey ridge line, which stands 24.8 metres above ground level; at its maximum point, to the top of its rooftop plant, the building stands 30.1 metres above ground level (34.3 metres AOD). By comparison, the

proposed building would stand 34.3 metres above ground level (37.5 metres AOD) at its maximum point.

164. As confirmed in views 3, 10 and 15 of the applicant's Townscape Visual Impact Assessment, the proposed development would sit comfortably within its immediate townscape, mediating between the height of its two riverfront neighbours, Red Lion Court and Rose Court. Its new height would generally align with its surroundings, making for a coherent riverfront. The more notable changes in contextual scale would be onto Park Street (TVIA view 13) and Southwark Bridge Road (TVIA view 12), although this is more a matter of the building's massing than actual height, as elaborated on in a subsequent part of this assessment. Importantly, the building would remain below the height threshold for the views from One Tree Hill (TVIA view 4) and Nunhead Cemetery (TVIA view 5), preserving the protected borough vistas. Similarly, the new scale does not impose upon strategic views.



*Figures 16 and 17 (above): The existing building (top) and proposal (bottom) as seen within the eastern portion of the LVMF River Prospect 12.A.*

165. With respect to the proposed massing, the top floor would be extensively recessed, with the façade set back by approximately 4 metres on its north elevation and approximately 4 metres on its flank and Park Street elevations, suggesting shoulder heights of approximately 27 and 29 metres onto the principal facades, riverfront and Park Street, respectively. Although partly negated by the over-sailing canopy roof, the setbacks and expressed shoulder heights would ease the sense of height and bulk of the additional storey to a



comfortable degree. The extensions would have a modest effect on the building's overall sense of scale onto the riverfront, as seen in the local views along the Thames Path (TVIA views 14 and 15) and where the eye is drawn more by the new raised, colonnaded front with its setback facade, which is effective in easing its massing at lower levels and in allowing an onward glimpse of the pedestrian underpass beyond.

166. The extension onto Park Street is an important feature of the proposal. The wedge-shaped massing would project southwards almost to the pavement line, but between levels 03 and 06 only, creating a canopied triple height space below and a recessed storey above. The new footprint would bring the building onto a more satisfactory, orthogonal arrangement with the street, its elevated additional massing picking up the common building line with RedLion Court and the Premier Inn hotel beyond to the east. The additional massing would be supported on new columns, creating the triple-height space beneath. The latter would be successful not only in providing a covered off-street entranceway but also in maintaining a sense of openness at street level. As seen in TVIA view 13 along Park Street, while the additional scale would give a greater sense of enclosure to the street, it would achieve a visual coherency within the streetscape, being of a similar apparent height and three-dimensional relationship as Red Lion Court to the buildings opposite, and without becoming overbearing.



*Figure 18 (above): The existing building, as seen looking westwards along Park Street (TVIA View 13).*



*Figure 19 (above): Visualisation of the proposed building within the same Park Street view.*

167. In terms of Southwark Bridge Road, the side extension and roof addition are largely obscured from view by Anchor Terrace when approaching from the south (TVIA view 11). When seen in close views, the side infill reads as a

modest extension on a rational building line and not unduly bulky. The additional roof extension is experienced in the context of the similarly large scale of the Rose Court building on the west side of the bridge and does not read as bulky or overbearing with its setback form (TVIA view 12).

168. Overall, the building would remain comfortably scaled within its townscape context, the side and roof extensions appearing rational and modest, and not adding undue height or bulk. The building's apparent scale is further eased by its elevational designs.

### Architectural treatment

169. The application proposes to remove the existing dark glazed façade system and re-clad the structure, including the extensions, to provide a new, contemporary architecture. The replacement curtain walling would wrap around the columns in a more consistent manner, with the facade line brought down to the third floor level. Below this on the lowest three storeys of the building, the new curtain walling would infill between the existing columns, with the facade setback on the riverfront to leave the columns fully exposed. New columns would also be introduced to the Park Street and west extensions. The application proposes to overclad all the columns in a glass reinforced concrete (GRC) finish, bringing a strong sense of base to the building. The new curtain walling at levels 00 to 02 would be clear glazed with thin metalwork framing, giving a light, transparent appearance to the base. Above this, the curtain walling would be finished in a grid of vertical metalwork fins and projecting horizontal spandrels on levels 03 to 06, switching back to the clear curtain wall glazing for the uppermost storey. The expressed floors slabs at levels 03, 07 and 08 are to be over-clad in matching GRC, offsetting the vertical fins and bringing a greater horizontality to the facades. The designs would be effective in giving the building a strong sense of base, middle and top, breaking up its elevations and easing the building's apparent scale.



*Figure 20 (above): Visualisation of the proposal, as viewed from the southwest of the site on Southwark Bridge Road, showing its relationship to Anchor Terrace (right hand side of the image).*

170. The proposed metalwork fins are a clever device, bringing material detail and visual interest, as well as reducing solar gain. On the Park Street elevation the fins would be carefully angled and occasionally backed by matching infill panels to minimise overlooking of residential windows directly opposite. The metalwork frames, fins and spandrels would be finished in a bronze-coloured anodised aluminium, complementing the light coloured GRC and offering a contemporary office aesthetic. A pattern work of perforations on the fins is proposed for visual interest, the final appearance of which is to be confirmed by condition. Moreover, the regular rhythm of the fins would be disrupted by large openings punched into the framework to provide feature windows, producing a more engaging aesthetic and good outlook onto the Thames and towards other notable views.
171. The perimeter roof terraces at level 07 would provide attractive outdoor amenity space for the offices, with the oversailing roof canopy of the riverside terrace bringing a distinctive profile to the building on its north elevation. The roof plant above would be concealed behind a tall, serrated plant screen; this would have a glassy dark blue/green finish, bringing an engaging profile and appearance to the roof. The final details and material choice are to be confirmed by condition.





*Figure 21 (above): Visualisation of the proposed riverside terrace at level 07 of the building.*

172. Overall, the facade designs work well to bring a coherent, contemporary appearance to the refurbishment and are sufficiently engaging, albeit in a modern, corporate style. The material palette and facade sections (including parapets, balconies, fins and punched-hole opens with shadow box details) should be conditioned to confirm a high quality of materials and detailing.
173. The applicant has indicated their intention to apply at a future time to install illuminated building signage to replace the current FT logos on the south and north façade of the building. This is acceptable in principle, given the precedent, but its size and level of illumination will need to be carefully controlled to avoid it becoming a dominant or distracting element in the river views or affecting neighbour amenity. This can be controlled by condition.

### Tall buildings

174. The highest parts of the scheme would be over 25 metres in height, which due to the site's location in the Thames Policy Area causes the proposal to fall within the scope of the Council's adopted tall buildings policy, Saved Policy 3.20 of the Southwark Plan. This policy expects tall buildings to be located in the CAZ and Opportunity areas, and in places with good public transport accessibility. It also has specific requirements for tall buildings to make a positive contribution to the landscape, be located at a point of landmark significance, relate well to their surroundings (particularly at street level), and contribute positively to the London skyline, as well as demonstrating excellent design.
175. Policy D9 of the New London Plan contains similar –albeit more detailed– requirements to Saved Policy 3.20 in respect of the visual impact of tall

buildings, while also addressing their functional, environmental and cumulative impacts. A key criterion of Policy D9 relevant to this planning application is part f), which says “buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including view, and not contribute to a canyon effect along the river”.

176. Emerging Policy P16 (Tall Buildings) of the NSP requires the design of all buildings of 30 metres height or greater to, amongst other things:

- be located at a point of landmark significance;
- have a height that is proportionate to the significance of the proposed location and the size of the site; and
- make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings.

177. In terms of public facilities, Policy P16 requires all new buildings of 30 metres or more in height to:

- provide a functional public space that is appropriate (in quantum) to the height and size of the proposed building; and
- provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate.

*Landscape contribution*

178. The development includes additional public open space and a number of significant improvements to the public realm. These are considered to be commensurate with the scale of development, and would include most notably:

- the widening of the Thames Path from 4.6 metres to 6.5-7.5 metres and easing the pedestrian pinch-point at the entrance to the Southwark Bridge underpass;
- the creation of the West Urban Street along the west side of the building, connecting Park Street and the Thames Path, which would be open to the general public 24 hours a day; and
- the provision of the new landscaped pocket park and attractive pedestrian through-route on the east side of the building, with daytime access for the general public.

*Point of landmark significance*

179. The site does not possess such strategic importance as to warrant signifying

with a very tall building. Its townscape legibility value is partly in landmarking the bridgehead of Southwark Bridge, albeit this is more of local significance. Its value is more in being part of a cluster of similar scaled commercial buildings that collectively express the commercial/ cultural hub of Bankside.

*Highest architectural standard*

180. The proposed building would be a high quality refurbishment scheme, designed to make the most of the existing structural frame in a sustainable manner, entailing upgrades to the building's services and cladding to provide a high-performance, flexible office building. The scheme is designed to achieve an excellent BREAM rating. The architecture itself is well considered.

*Relates well to its surroundings*

181. In terms of both its base and general design the proposed building would relate well to its immediate surroundings. The building's base has a visually open, transparent character at ground floor, with new entrances activating all four building frontages and clear glazing bringing animation to the adjacent street scenes. The new riverfront retail/café unit would enliven this part of the Thames Path for pedestrians, help consolidate the commercial frontage along this part of the river, and allow raised views over the river wall. The scale and elevational architecture would relate well to the wider context, with the building's extended footprint and massing providing a more rational alignment within its streetscape setting. The scheme's scale and modern office aesthetic would work well with its riverfront location.

*Positive contribution to the London skyline*

182. The building would read as part of the context of large-scale buildings that sit within Bankside, consolidating the cluster of taller structures that line this stretch of the riverfront. Its contribution would be positive, with its engaging architectural treatment and confident rooftop finishes.

*Free-to-enter publicly-accessible areas*

183. Two new public spaces, the pocket park and West Urban Street, would be delivered as part of this tall building proposal, along with an enlargement to the Thames Path. These are considered to be high-quality new open spaces commensurate in size to the building's scale.

*Conclusion on tall building considerations*

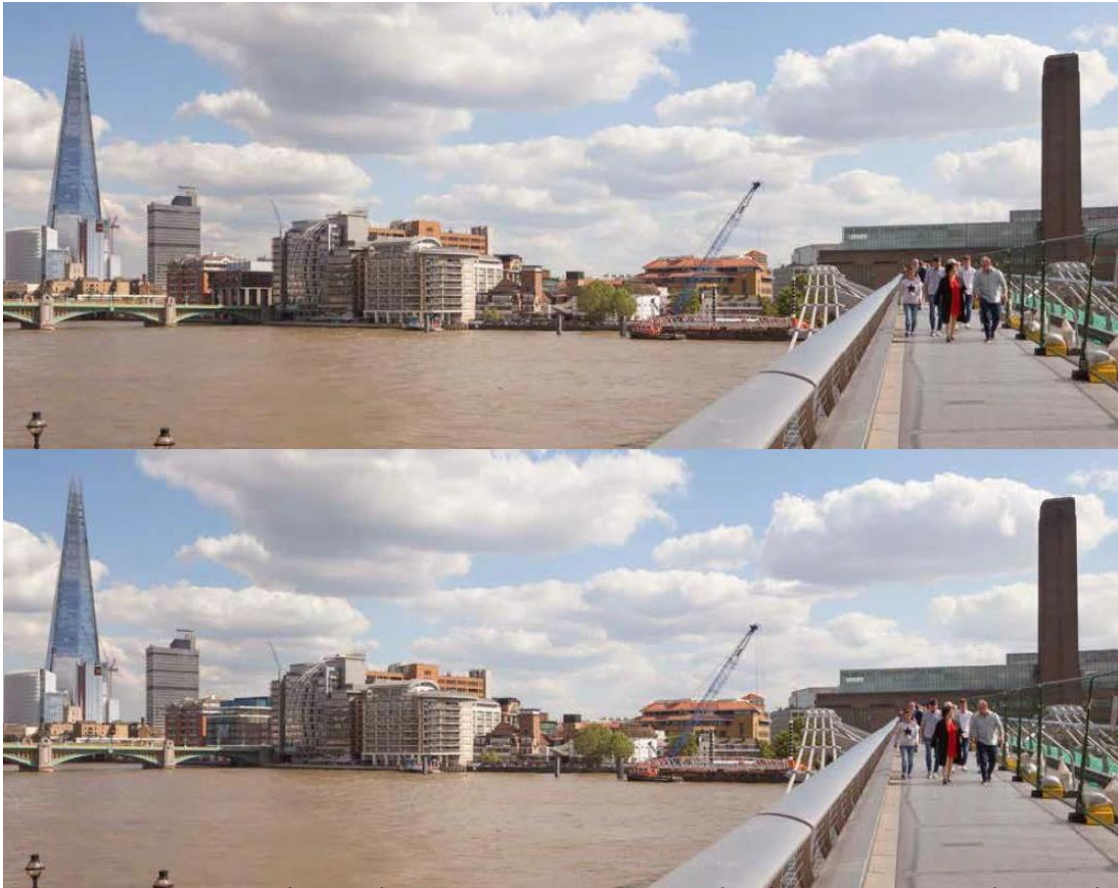
184. Overall and having taken account of the effects arising cumulatively with other proposed, consented and planned tall buildings nearby, the development's design meets the policy criteria for a new tall building. However, a significant

outcome of a tall building is its visibility and while this is not harmful in itself, the potential effects on the 'receptor' townscape and heritage assets are of special concern.

### Heritage implications

185. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and its setting and to pay "special regard to the desirability of preserving or enhancing the character or appearance of that area". Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to have "special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". The NPPF provides guidance on how these tests are applied, referring in paragraphs 199-202 to the need to:
- give great weight to the conservation of the heritage asset (and the more important the asset, the greater the weight);
  - evaluate the extent of harm or loss of its significance;
  - generally refuse consent where the harm is substantial; and
  - where necessary, weigh the harm against the public benefits of the scheme.
186. Paragraph 203 goes on to advise taking into account the effect of a scheme on the significance of a non-designated heritage asset.
187. The planning application includes a Townscape and Visual Impact Assessment that provides verified images of the development when viewed from 16 locations in and around the Bankside area, and when viewed within the relevant protected London panoramas. The submission demonstrates that at the proposed height the development will not be visible in the protected panoramic views from Alexandra Palace (LVMF 1A, TVIA view 1) or from Kenwood (LVMF 3A, TVIA view 2), being entirely screened from view by interposing buildings. Regarding other long distance views, whilst the building will be partially visible in the borough's protected vistas from One Tree Hill (BV1, TVIA view 4) and Nunhead Cemetery (BV2, TVIA view 5), it will nonetheless be read as similar in scale to its context and neither especially eye-catching nor so tall as to encroach upon St Paul's including the west towers.
188. Closer-by, regarding the river prospects from London Bridge (LVMF 11A, TVIA view 9), Southwark Bridge (LVMF 12A2, TVIA view 9) and the Millennium Bridge (LVMF 13, TVIA view 10), the proposals would have a neutral effect on the townscape in these views. The building would be seen very much within the context of similar scaled buildings, maintaining the

general horizontality of built forms along the riverfront, and would not interfere in views of landmarks or notable listed buildings highlighted within the prospects.



*Figures 22 and 23 (above): The existing building (top) and proposal (bottom), visible at the far left-hand side of each image, in LVMF River Prospect 13A.*

189. The application site is outside but adjacent to the Thrale Street Conservation Area, which includes the neighbouring Grade II Anchor Terrace within its boundary. The significance of the conservation area lies in its nineteenth century metropolitan townscape, characterised by grand industrial and commercial buildings built following the construction of Southwark Bridge Road and Southwark Street, and which contrast with the surviving, simpler domestic eighteenth century buildings of Thrale Street.
190. As seen in the short sequence of views along Southwark Bridge Road (TVIA views 11 and 12), the site is initially generally screened by the late Georgian buildings that form Anchor Terrace, with the existing dark glazing glimpsed just above and to one side of the end-of-terrace property, as well as to the rear of the terrace. The recladding lightens the appearance of the main mass in the backdrop, albeit the proposed rooftop finish is more evident. The material finishes for the roof can be reviewed by condition. The second view is taken close-by and shows the building neighbouring Anchor Terrace. In

this view the proposed building's more rational built form and lighter cladding sit more comfortably with the end-of-terrace property, the eye being drawn to the shared sense of elevational hierarchy and the relationship of the building's horizontal bands and the stuccoed ground floor, secondary cornice and parapet of the listed building. On balance, the proposals would have a neutral effect on the setting of the Thrale Street conservation area. Although not shown, it is accepted that the building would have at most a negligible impact on other conservation areas in the wider locality, such as Bear Gardens and Borough High Street, being too distant and/or obscured by intervening buildings and structures.

191. Regarding listed buildings, the main considerations are Anchor Terrace (Grade II), Southwark Bridge (Grade II) and the Anchor public House (Grade II). As referenced above, the development would have an improved relationship with the neighbouring terrace, and would modestly improve the setting of the heritage asset. In terms of Southwark Bridge itself (views 3, 12 and 15), the development does not alter the character of the setting of the bridge or interfere with how the structure and its Edwardian decorations are read, preserving its special interest. Lastly, there is limited inter-visibility between the public house and the development site, with the Premier Inn building and Red Lion Court intervening to screen the development. It would be glimpsed from the pub's riverside forecourt space, but when viewing away from the listed building and is at sufficient distance not to affect how the heritage asset itself is experienced, preserving its setting.
192. The development is not visible within the protected metropolitan panoramas, but is discernible within the protected riverside prospects and the borough's protected vistas. However, its appearance causes no or negligible harm, preserving these sensitive views. The building is more evident from within the settings of the Thrale Street conservation area and listed buildings closer-by, although for the most part it is only glimpsed or is read as one of several similar scaled buildings, and as such causes no harm to their settings or significance, preserving the heritage assets. If anything, there is a modest improvement to the setting of the Grade II listed Anchor Terrace. There is no requirement to weigh the impacts of the development against the public benefits of the scheme.

### Design Review Panel

193. Lastly, the proposals were reviewed by the Council's DRP at the pre-application stage in November 2020. The scheme was generally welcomed by the panel. It supported the increase in height and massing and endorsed the scheme's approach to sustainability with the retention and adaptation of the original building, and the opening up the new north-south pedestrian route to the west of the building. The panel questioned the concept of a 'pocket park' to the east, which it thought was too constrained, but supported its

development as a landscaped courtyard space. It welcomed the effort being made to open up the river frontage, with the new café and steps. However, the panel thought the existing building had a strong architectural identity that was lacking in the new designs, and encouraged further refinement and a more bespoke solution.

194. The scheme architects responded positively to the DRP comments, reassessing the landscaping and developing the designs for the pocket park. They progressed the elevational treatment, refining the designs for the fins and the arrangement of the picture windows. Officers are satisfied with the adjustments made.

### Inclusive access

195. Policy D5 of the London Plan requires development proposals to achieve the highest standards of accessible and inclusive design, requiring applications to be supported by an inclusive design statement within the Design and Access Statement. The Mayor provides detailed guidance on creating inclusive neighbourhoods in the Accessible London SPG 2004.
196. The applicant's inclusive design statement sets out the various inclusive access measures. These include:
- all surfaces at a gentle gradient and surfaced in slip-resistant treatments;
  - all uses to have step-free access through the provision of ramped or lift arrangements;
  - cycle storage provision to allow for larger cycles such as cargo cycles, purpose built cycles for disabled people and tricycles; and
  - signage to be clear, legible and consistent.
197. The proposal is ambitious in its inclusive design principles creating a convenient and welcoming building and new public spaces that can be entered, used and exited safely, easily and with dignity for all.

### Designing-out crime

198. Saved Policy 3.14 of the Southwark Plan 2007 and Policy D11 of the London Plan 2021 require development proposals to reduce opportunities for crime and create and maintain safe internal and external environments.
199. Mentioned throughout the Design and Access Statement are the various ways in which opportunities for crime have been designed-out. Examples include:
- creating well lit routes (using Public Rated Lighting where appropriate) with good sight lines;

- designing-out spaces for anti-social behaviour;
  - installing CCTV and intruder detection systems within the building and the publicly-accessible external spaces;
  - installing card access speed gates and access-controlled doors;
  - staffing the site 24 hours a day with security personnel;
  - designing the cycle store room to be open-plan, well-surveilled and secure;
  - providing secure and well-surveilled short-stay cycle parking; and
  - using retractable bollards within the public realm.
200. The Metropolitan Police's Secure by Design Officer has assessed the proposal and is confident that certification can be attained. To ensure certification is ultimately achieved, the imposition of a two-part 'Secured by Design' condition is recommended.

### Conclusion on design

201. The proposal would reconfigure, extend and re-clad the former FT Building on the south bank of the Thames, providing an eight storey office-led building of a contemporary office standard. The existing building dates from the late 1980s and has a strong architectural expression, but is not considered a building of notable architectural or historic interest. The building is unlisted and located outside a conservation area, but is within the vicinity of a number of heritage assets, including the Grade II listed Anchor Terrace and Southwark Bridge, as well as the Thrale Street Conservation Area.
202. The reconfigured building footprint and layout are well-conceived, presenting an engaging built form and opening up the site's perimeter to provide new and extended public routes, including a widened stretch of the Thames Path and a new publicly-accessible pocket park. The public realm would be animated, with the base of the building designed to be transparent, offering good oversight of the public space, and activated by legible entrances to the building, including a new riverfront public café.
203. The proposal is for the retention of as much of the existing building fabric as possible, with refurbishments and modest extensions. The additional rooftop storey results in the building being regarded as a tall building. The additional height and massing are generally well-judged; they would respond to the cluster of large riverfront buildings and maintain the horizontality of the contextual built form. The proposed height would not interfere in the protected strategic and borough views of St Paul's, and while seen within the riverside prospects, it would be read as part of this coherent riverside cluster.
204. More locally, the building would be seen within the settings of several heritage assets, albeit for the most part it would only be glimpsed or read within the background context of similar scaled buildings, preserving the settings. The



improved design would sit more comfortably with the Grade II listed Terrace, modestly improving its setting.

## Public realm, landscaping, trees and urban greening

### Public realm and landscaping

205. The proposal would deliver a number of public realm benefits, including the infilling of existing lightwells to allow the widening of the Thames Path and to open up on the public route between Park Street and the Thames Path on the west of the building, adjacent to the arches. The new surfaces would be finished in high quality paving materials, complemented by predominantly low-level lighting.



*Figure 24 (above): Visualisation of the proposed pocket park.*

206. Additional open space is proposed in the form of the pocket park on the east side of the building, with the gardens and route through to the Thames Path made available to the public during the daytime. This open space would offer attractive soft landscaping and street furniture in a contemporary design. Outside of the hours of public access, metalwork gates would provide closure to the pocket park; these would have a complementary, contemporary design, the final detailing of which is to be secured by condition.
207. Some public representations have questioned the design of the pocket park, especially in respect of how it relates to the boundary shared with Red Lion Court. Some representations have also questioned whether the proposed opening hours are sufficiently generous. The layout –whereby the main pedestrian route would flank the common boundary– sets up opportunities for

any development on the adjoining land to create an adjacent green space or new secondary pedestrian routes off. With regard to the on-site impact, the positioning of the pedestrian route along the boundary enables the rest of the site to be given over to a good-sized area of soft landscaped space. As such, the layout is considered an appropriate response to the site and the adjoining Red Lion Court. Being set back from Park Street and the Thames Path, the pocket park has a 'discoverable' quality and would provide very limited public amenity value at night. For these reasons, the proposed opening hours of 8am to 8pm are considered appropriate. The recently consented scheme at the nearby 105 Sumner Street site has a similarly 'discoverable' courtyard, the opening hours of which are also 8am to 8pm.

208. Lastly, the development includes the resurfacing of the pavement along Park Street and the shared entranceway space. The designs again make use of high quality natural stone paving, and include modest elements of landscaping that should make for an attractive street scene. Overall, the landscaping and public realm proposals are well received from a design perspective.
209. Having considered the materials and specifications proposed at this stage, the Council's Urban Forester is satisfied that high quality spaces would be delivered, supported by appropriately-selected indicative trees and other soft planting species. The final hard and soft landscaping scheme is to be secured by condition.

### Trees

210. While there are no existing trees on site, two street trees on Park Street whose crowns overhang the street and/or the boundary of the site would require pruning. This would be necessary only on a one-off basis to facilitate construction access; it would not involve permanent re-forming of the canopy. These works will be the responsibility of the applicant, and are to be carried out at cost with an acceptance of public liability, and only once prior agreement from the Council's Arboricultural Services Team has been obtained.
211. Additionally, and in order that the trees on or directly adjacent to the site are protected from damage by all demolition and construction works, a detailed Arboricultural Method Statement will be required by condition.
212. With respect to new planting, the landscape design proposals include a landmark tree to be positioned in the pocket park. Details of the tree and its pit, and an obligation to replace it should it fail within five years of planting, will be secured through a 'hard and soft landscaping' condition.
213. In summary, the strategy for the existing and proposed trees around the site is compliant with Policy 3.28 of the Southwark Plan 2007, Strategic Policy 11 of

the Core Strategy, Policy G7 of the London Plan 2021 and emerging Policy P60 of the NSP.

## **Green infrastructure, ecology and biodiversity**

### Urban greening

214. Policy G5 of the London Plan 2021 states that urban greening should be a fundamental element of site and building design. It requires major developments which are predominantly commercial, such as the proposed scheme, to achieve an Urban Greening Factor (UGF) score of 0.3.
215. The proposed development would achieve an urban greening factor of 0.12. This would be achieved through a combination of:
- 396 square metres of extensive green roof;
  - standard trees planted in tree pits or natural soil with scope for moderate growth, providing a total coverage of 62 square metres; and
  - flower-rich perennial planting, hedges and groundcover planting.
216. While the 0.12 score would fall short of the 0.30 UGF advised by the London Plan 2021, it must be recognised that the proposal is in the main an extension and upgrade to an existing building, rather than a demolition and wholesale new build. This reduces the opportunity to introduce greater provision of ground level green spaces. When balanced against the environmental and embodied energy benefits brought by the retention of most of the existing structure, it is considered that the green infrastructure potential at the site has been maximised through the creation of biodiverse green roof along with tree planting and species rich planting areas. As such, the UGF score is considered acceptable. A two-part condition will be imposed to ensure the development is built-out to achieve the 0.12 urban greening factor.

### Ecology and biodiversity

217. The application was supported by a preliminary ecological assessment, which the Council's Ecologist has reviewed and deemed satisfactory. The site was found to have low existing ecological value, and the development would have a negligible impact on the non-statutory sites near to the development and the priority species in the area. A condition requiring compliance with the Ecological Management Plan will be attached to the decision notice. Additional conditions are recommended to secure the provision of ten Swift bricks and two Red Start boxes within the building fabric to support local biodiversity.

## Transport and highways

### Trip generation

218. Policy T4 of the London Plan 2021 requires development proposals to ensure the impacts on the capacity of the transport network are fully assessed and that any adverse impacts are mitigated. The policy requires all major development proposals to be supported by a Transport Assessment, a requirement also stipulated by Saved Policies 2.2 (Provision of New Community Facilities) and 5.2 (Transport Impacts) of the Southwark Plan 2007.
219. With respect to private car trips, the Council's Transport Policy Team predicts the proposed development would generate 12 and 8 two-way net additional vehicle movements in the morning and evening peak hours respectively, which is higher than the 4 two-way vehicle movements estimated by the applicant's Transport Statement for either of the peak hours. Notwithstanding the different estimates, the Transport Policy Team is comfortable that these levels of vehicular traffic would not have any noticeable adverse impact on the local highway network, especially in light of the mitigation measures the applicant has proposed in their Travel Plan.
220. The car-free nature of the scheme (with the exception of wheelchair parking) and the significant reduction of on-site car parking spaces would actively promote use of sustainable transport options among future employees. This is reflected in the applicant's Transport Assessment, which predicts 284 and 225 two-way net additional public transport trips in the morning and evening peak hours respectively. These figures are deemed reasonable.

### Car parking

221. Policy T6 (Car Parking) of the London Plan 2021 requires developments in locations with existing and future high public transport accessibility to be car-free, save for adequate parking for disabled people. Specific requirements for different uses are set out in Policy T6.1 through to Policy T6.4, while Policy T6.5 deals with non-residential disabled persons parking. Southwark Saved Policy 5.6 (Car Parking) requires all developments to minimise the number of spaces provided.
222. Emerging policy P53 (Car Parking) of the NSP echoes the New London Plan, promoting car-free development in zones with good public transport accessibility. It requires car-free non-residential proposals in CAZ locations, and for any disabled parking to be provided on-site and supported by EVCPs.
223. The existing site accommodates 8 car parking spaces, including 1 accessible space at the Park Street frontage. The removal of all non-disabled parking

from the site is welcomed. The Controlled Parking Zone in place in this location provides adequate daytime parking control in this vicinity. The proposed development would be car free except for two off-street disabled spaces, which would be provided in the drop-off area accessed from Park Street. The two spaces would be managed by security and reception staff at the main office building to ensure accessibility for Blue Badge holders at all times. Given the site's location and high PTAL rating this is an acceptable approach. Electric Vehicle Charging points should be provided for the disabled bays, and this will be required by condition.

### Cycle parking

224. Cycle parking provision should be in accordance with London Plan Standards as well as Strategic Policy 2 (Sustainable Transport) of the Core Strategy and Saved Policy 5.3 (Walking and Cycling) of the Southwark Plan. The emerging strategy for cycling and cycle parking standards in the borough is set out in Policy P52 (Cycling) of the New Southwark Plan.
225. 375 long stay and 30 short stay cycle parking spaces are proposed. The long-stay spaces would be provided in a dedicated store room at ground floor level; of these spaces, 320 would be provided by two-tier cycle racks with the remaining 55 spaces provided by Sheffield racks (including 2 holding and 4 disabled/cargo bicycle spaces). With respect to the short stay cycle parking, 14 spaces would be provided by 7 Sheffield stands adjacent to the drop-off point, and 16 spaces would be provided by 8 Sheffield stands in the pocket park.
226. For this development, the New London Plan requires a minimum of 375 long-stay spaces (374 for the office, and 1 for the retail) and 22 short-stay spaces (15 for the office and 7 for the retail). The proposal meets these minimum requirements. With the proposal being a refurbishment and extension of an existing building, achieving the New Southwark Plan requirements is not possible. Nevertheless, the Transport Policy Team considers there to be scope to increase the level of cycle storage provision; as such, an informative will be attached to the decision notice encouraging the applicant to explore how more than 405 spaces might be deliverable when preparing their final cycle storage details for post-decision approval.
227. To compensate for being unable to meet the New Southwark Plan requirements and to promote cycle use more broadly among employees and visitors to the proposed building, the applicant has offered to contribute towards the expansion of the existing nearby cycle hire facility, as detailed below.

### Improving access to cycle hire options

228. Given that the town centre is a key destination and the development would introduce up to 775 new employees to the site, the applicant has agreed to contribute £50,000 towards the provision of a new or enlarged TfL (Santander) docking station within the vicinity of the site. To be secured in the Section 106 Agreement, this contribution would meet the requirements of Policy T5 of the London Plan 2021 and emerging policy P52 of the NSP.

### Improvements to local footway and highway environment

229. Presently, although there is a pedestrian bridge from the Southwark Bridge Road footway into the building, it is of a stepped design and thus does not provide level access. The proposed development seeks to improve this arrangement by introducing a platform lift that would transport a wheelchair user up/down the short flight of steps. The final details of this arrangement will be secured by condition. This will improve the travel experience for mobility-impaired visitors/employees to, from and around this development. Further pedestrian improvements would be delivered on Park Street, where the existing footway to the front of the site would be widened. These would all make for an improved local footway and highway environment.
230. In accordance with Healthy Streets, the Transport Policy Team has sought various contributions from the applicant towards a range of highway safety measures together with improvements to pedestrian/cycle routes in the vicinity of this development. The specific set of works is detailed in the 'Planning Obligations: Summary Table' in a later part of this report.

### Legible London signage

231. The applicant has agreed, at the request of TfL, to make a contribution of £20,000 towards providing new and refreshed Legible London signage. This will be secured in the Section 106 Agreement.

### Servicing and deliveries

#### *Servicing/delivery facilities and vehicle routing*

232. The proposal includes a new internal loading yard able to accommodate up to three vehicles (each no more than 3.5t) at once. Vehicles of this size would be able to manoeuvre within the loading yard such that entry from and exit onto Park Street would be possible in forward gear. In the exceptional circumstance of a larger vehicle (7.5t or greater) requiring access, the vehicle would need to reverse into the bay under the supervision of banksmen.

233. Any delivery vehicle in excess of 3.5 metres in height would be routed to the site from the east, via Park Street, due to the low head room where Park Street runs beneath Southwark Bridge Road. All vehicles smaller than 3.5 metres in height would be able to leave and depart the site in either an eastbound or westbound direction; the routing of an inbound vehicle would be determined by its origin, and similarly the routing of an outbound vehicle would be determined by its destination.
234. The proposed servicing arrangements, with appropriate routing of inbound and outbound vehicles, are supported by the Council's Transport Policy and Highways Development Management Teams.

Servicing/delivery hours

235. To prevent servicing take place at night and during the highway network's peak morning and evening hours, deliveries would take place only between the following hours:
- 10:00hrs to 20:00hrs on Mondays to Fridays;
  - 09:00hrs to 18:00hrs on Saturdays;
  - 10:00hrs to 16:00hrs on Sundays and Bank Holidays.

Servicing/delivery trips

236. Some of the public comments received about this planning application have suggested the building operator be obligated to work with other commercial developments nearby to consolidate and reduce deliveries. A key element of the applicant's DSP is a Consolidation Strategy, which proposes to link the application site with others in the WPP campus and neighbouring developments. Aiming to reduce delivery and servicing trips as much as possible, the measures contained with the Consolidation Strategy include:
- identifying a single consistent point of contact for all delivery and servicing requirements, ensuring no unnecessary or duplicated deliveries occur;
  - coordination and collaboration with the equivalent facilities management team at Rose Court and Sea Containers House to consolidate mutual requirements and utilise the same delivery orders where possible;
  - Instituting a monitoring programme to continually review all servicing activity across the site with the aim of identifying areas for improvement;
  - engaging with 'deliverBEST' to ensure continual improvement and consolidation; and
  - allowing a 20-minute slot for all deliveries, which will ensure each delivery is successful.

237. The applicant's consultants have estimated that 108 two-way delivery vehicle movements would occur on this site per day mostly by light vans, which would be halved to 54 through the planned consolidation method, which is considered acceptable.
238. The submission and approval of a formal standalone Delivery and Servicing Management Plan (DSP) is to be required by condition, and the operation of the building thereafter will need to be in accordance with the approved DSP. As a precautionary measure, a Delivery and Servicing Management Bond will be secured so that adherence to the DSP and highways impacts can be monitored over the course of the first two years of operation.

### **Refuse storage arrangements and waste minimisation**

239. A dedicated room would be provided at ground floor level to store refuse produced by all uses within the development. The store room would be located off the integral loading yard and directly accessible by all the office (market and affordable) and retail uses. The refuse store has been over-sized to accommodate refuse volumes produced by both the proposed development and any future commercial development within the arches, which is welcomed.
240. The on-site management team would be responsible for transferring any waste from within the commercial areas of the building to the store room in good time prior to collection.
241. Refuse would be collected by a commercial operator, on a probable frequency of three collections per week and no more frequently than once a day. The truck would reverse into the integral loading yard from Park Street; from here, personnel would enter the refuse store to access the bins. The truck would then emerge onto Park Street in forward gear.
242. The proposed storage and collection arrangements have been assessed and deemed acceptable by the Council's Waste Management Team and Transport Policy Team. A final Delivery and Servicing Plan will be secured by condition.

### **Environmental matters**

#### **Construction management**

243. The applicant has submitted an Outline Environmental Construction Management Plan. This document has been reviewed by the relevant transport and environment consultees, who have deemed it to be satisfactory as a framework document.



244. Representations from members of the public about this planning application have requested that the contractor work with residents through the construction phase. The applicant's Construction Environmental Management Plan responds to this by committing to establish a resident's committee/working group, whereby local residents would be regularly updated about the works and future events. As well as keeping residents informed of construction activities, this will provide a platform for residents to share any concerns they may have. This will be in addition to the regular newsletter updates that will be provided to all local residents.
245. Some public representations about this application have requested that the construction phase be compressed as much as possible, with one comment asking for the south façade works to be foregrounded in the construction programme. The CEMP suggests Phase 1 (Demolition, Enabling Works and Ground Works) will last 22 weeks. It estimates that Phase 2 (Main Construction Works) would last 91 weeks, with a forecasted start date of early 2022 and a completion date of late 2023. Due to the sequencing of the build, it has not been possible to isolate the south façade works from the remainder of the facade and bring them forward in the build programme. However, taking into account the range of mitigation measures proposed in the CEMP, it is considered that the amenity of nearby residents would be safeguarded.
246. Some public representations have also raised concerns that construction activities/traffic will cause congestion and/or disturbance. Any construction activities on the site would be expected to take place during the Council's standard working hours in the interests of minimising disturbance to residents. In terms of routing, all vehicles approaching the site would do so travelling westbound along Park Street, having come from Southwark Street via Redcross Way. Vehicles lower than 3.5 metres in height would exit the site westbound along Park Street before turning south into Sumner Street and rejoining Southwark Bridge Road via Sumner Street. For vehicles greater in height than 3.5 metres, the egress route would be eastbound along Park Street to Southwark Street via Redcross Way. All relevant consultees have assessed this routing strategy and deemed it to be acceptable with regard to the network impact and local environmental conditions.
247. In order to ensure that increases in traffic, noise and dust associated with the demolition and construction phases of the development are minimised, Final Environmental Management Plans and Final Logistics Plans are to be required by condition.

### Fire safety

248. Policy D12 of the London Plan 2021 expects all development proposals to achieve the highest standards of fire safety and to this end requires applications to be supported by an independent Fire Strategy, produced by a

third party suitably qualified assessor.

249. A Fire Compliance Statement was submitted with the application. This contains a matrix which assesses the scheme for compliance against the relevant parts of Policy D12. The Fire Compliance Statement:

- proposes a “simultaneous evacuation strategy;
- commits to providing two firefighting shafts;
- commits to upgrading fire safety measures throughout, to include high levels of compartmentation, sprinklers, fire alarms and PRM refuges;
- confirms compliance with Building Regulations Approved Document B; and
- explains how the internal layout would achieve compliant travel distances.

250. How the fire services would gain vehicular access to the site would differ depending on which core the firefighters need to enter. Should the South Core need to be reached, the pumping truck would be expected to park within the drop-off area in front of the main entrance. Should the North Core need to be reached, the pumping truck would travel from the drop-off area to the northern end of the West Urban Street, with retractable bollards giving way for the vehicle to enter this otherwise pedestrian area.

251. The Fire Compliance Statement was produced by fire risk engineering consultancy MLM Group. A certified fire risk engineer (a Fellow of the Institute of Fire Engineers) has checked and approved the contents.

252. As part of the GLA Stage I process, the Fire Compliance Statement was assessed and no issues were raised. Therefore, the relevant fire risk minimisation policies of the London Plan are deemed to have been satisfied. A condition is recommended to ensure the construction and in-use operation of the building are carried out in accordance with the Fire Strategy.

### Flood risk, resilience and safety

253. The site is in Flood Zone 3 and is located within an area benefitting from flood defences. The Environment Agency has reviewed the applicant’s Flood Risk Assessment and considers it to be acceptable. While no conditions have been recommended by the Environment Agency, informatives have been requested. These informatives will be attached to the Decision Notice.

254. In terms of flood resilience and safety, no concerns have been raised by the Council’s Flood Risk Management Team to the flood risk mitigation measures as set out in the applicant’s Flood Risk Assessment.

### Sustainable urban drainage

255. The applicant's Drainage Strategy, which is contained within the applicant's Flood Risk Assessment, has been reviewed by the Council's Flood Risk Management Team. Although satisfied with the majority of the Drainage Strategy's content, the Team has requested further information with regard to rainwater harvesting, existing runoff rates, proposed runoff rates, and the SUDS maintenance regime. As such, a condition is recommended requiring the submission of a Final version of the Flood Risk Assessment and Drainage Strategy.

### Land contamination

256. The application was accompanied by a preliminary Land Contamination Risk Assessment, which the Council's Environmental Protection Team has assessed and deemed acceptable. A condition is to be imposed requiring a Phase 2 investigation to be conducted and the results submitted to the council for approval, with further remediation measures to apply if contamination is found to be present.

### Air quality

257. An Air Quality Assessment (AQA) was submitted with the application, which considers the air quality impacts arising from the construction and operational use of the development, taking into account all relevant local and national guidance and regulations
258. In terms of the construction phase, an Air Quality and Dust Management Plan appended to the AQA sets out a range of mitigation. Proposed measures include locating machinery and dust causing activities away from receptors, enclosing activities with solid screens and barriers to prevent dust dispersion, using covered chutes and skips, and ensuring all on-road vehicles comply with the London Low Emission Zone requirements.
259. The proposed building itself would be all-electric (meaning there would be no on-site combustion), which mitigates air quality issues and facilitates significant advances towards zero carbon in future decades as the National Grid continues to decarbonise.
260. The AQA concludes that, subject to the proposed mitigation measures, the effects on air quality during construction and operation are considered to be negligible. The Council's Environmental Protection Team has reviewed the AQA and raised no objection to the proposal subject to recommended conditions.

### Light pollution

261. The applicant's Design and Access Statement provides some outline proposals for how the surrounding external spaces would be illuminated. This would predominantly take the form of low-level fixtures. Examples include lighting integrated within furniture and bollards, sculptural and decorative lighting in key public spaces, and linear downlighting around the stepped entrance to the retail unit on the Thames Path.
262. A façade illumination proposal is provided on pages 167-174 of the Design and Access Statement. Following discussions with Council officers, the applicant has agreed to omit the façade illumination proposal from the planning application in favour of pursuing a more low-key lighting scheme. This is likely to comprise terrace lighting at Level 07, a WPP illuminated logo on the north and south elevations, and other discreet elevational lighting .
263. On the understanding that the final lighting proposals for the façade will be scaled-back from those depicted in the Design and Access Statement, the Environmental Protection Team does not consider there to be any risk of consequential light pollution.
264. The final proposals, including any pre-determined dim-down and turn-off times, will be agreed through the Final Lighting Strategy, to be approved by the Local Planning Authority prior to first occupation of the building. This will be secured by condition.

### **Archaeology**

265. The applicant has undertaken a considerable level of pre-application research, discussions and archaeological work to agree many elements of this application and eliminate the need for pre-commencement conditions. This involvement in the design of the scheme, including discussions of the foundation design has delivered a successful balance between archaeological research and preservation of significant archaeological remains in situ.
266. The work undertaken on this site has been instrumental in defining the development of much of this core area of Bankside between the two scheduled monuments of the Globe Theatre and the preserved remains of the Rose Theatre. The archaeological work necessary for this scheme so far has revealed significant information concerning the land use, and development over time within this property. It has been possible to investigate and preserve in situ building remains dating from the 16th century and later, together with land use evidence predating this development.
267. The applicant has worked with the Council's archaeologist through the pre-application and planning application stages to agree a suite of documentation

relating to further archaeological work, foundation design and public engagement. The finalised documents are to the Archaeologist's satisfaction.

268. A timed condition relating to archaeological reporting of the site is required in addition to compliance conditions relating to the archaeological work, foundation design and public engagement. Two Section 106 obligations are also required, the first to cover the Council's costs of monitoring the archaeological works and the second to be allocated to the Heritage Asset Promotion Fund. The latter will assist with the protection, promotion and enhancement of heritage assets within the vicinity of the development, in particular the Globe Theatre and the Rose Theatre. More information about these financial contributions can be found in the section of this report entitled 'Planning obligations'.

### **Energy and sustainability**

269. Policy SI2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. Policy SI3 require consideration of decentralised energy networks, Policy SI4 deals with managing heat risk and Policy SI5 is concerned with protecting and conserving water resources and associated infrastructure.
270. Policy 13 of the Core Strategy and Saved Policy 3.4 of the Southwark Plan 2007 sets out the borough approach to ensuring that new developments tackle climate change. The approach is generally consistent with London Plan policies but also requires new commercial developments to meet BREEAM 'Excellent'.

### **Energy and carbon emission reduction**

271. As per the carbon emission reduction policies of the London Plan 2021 and local development framework, the proposal would be expected to achieve zero carbon (with financial offset permitted once an on-site 35% carbon reduction against part L of the Building Regulations 2013 has been achieved).
272. Southwark Council's carbon offset cost is £95 for every tonne of carbon dioxide emitted per year over a period of 30 years. This is the equivalent of £2,850 per tonne of annual residual carbon dioxide emissions.
273. An Energy Statement based on the Mayor's hierarchy has been submitted by the applicant. This details how the targets for carbon dioxide emissions reduction are to be met. A combination of 'Lean' and 'Green' (but no 'Clean') measures have been employed in an attempt to achieve the reduction in line with the GLA guidance on preparing energy statements, the Southwark Core Strategy 2011 and the Southwark Sustainable Design and Construction SPD.

### Be Lean

274. In terms of meeting the “Be Lean” tier of the hierarchy, a range of passive and active measures are proposed. The passive measures include:

- high thermal envelope performance to reduce uncontrolled heat transfer through the building fabric (and improve the effectiveness and energy use of the mechanical ventilation system);
- use of thermal mass and high ceilings to manage the heat within the building;
- optimisation of the g-value of the proposed replacement glazed wall system to provide a balance between minimising heat gain and maximising natural daylight (to reduce lighting energy);
- solar shading fitted to the building’s exterior to limit the ingress of summertime solar gains; and
- highly insulated green roofs.

275. The active measures include:

- high efficiency ventilation systems including heat recovery on mechanical ventilation and air handling plant;
- low energy and high efficacy lighting systems (at least 120 luminaire lm/cW), fittings and controls (e.g. occupancy sensors);
- control systems to monitor and operate the plant and equipment as efficiently as possible; and
- pumps and fans with built-in variable speed drives and sensor, allowing them to respond to variable building loads.

276. The reduction in regulated carbon emissions achieved through these ‘demand reduction’ measures will reach 20%, exceeding the target of 15% set out in Policy SI 2.

### Be Clean

277. There are no carbon savings associated with the ‘Be Clean’ level of the hierarchy because there is no connection to a district heating network nor is a Combined Heat and Power (CHP) proposed. Connection to a district heating network cannot be proposed because one does not exist in the vicinity at present; nevertheless, futureproofing will be required by planning obligation.

### Be Green

278. With respect to the “Be Green” tier of the hierarchy, the applicant has proposed the following technologies:

- air source heat pumps for heating, cooling and water;
- rooftop mounted 51 kWp photovoltaic array for electricity generation, with roof coverage optimised, generating a predicted annual yield of 40,131 kWh/yr.

279. With carbon emissions being reduced by 20% through these 'Be Green' measures, the applicant has demonstrated that opportunities for renewable energy by producing, storing and using renewable energy on-site have been maximised.

### Be Seen

280. Introduced as part of the London Plan 2021, 'Be Seen' is the newest addition to the GLA's energy hierarchy. It requires developments to predict, monitor, verify and improve their energy performance during actual operation.

281. In respect of 'Be Seen' measures, the applicant has committed to:

- conducting a predicted operational energy use analysis (TM54 modelling) during the design stage and then measuring actual operational energy use once the development is in use, benchmarked against the in-design analysis;
- using full metered electricity and water supplies; and
- using sub-meters to measure electricity, heating and cooling energy use (linked to the building owner's Building Energy Management System), which would feedback energy consumption to each user group/functional space/tenancy within the development.

282. This is an acceptable set of monitoring measures, enabling occupational carbon emissions to be minimised and helping engender energy consumption awareness and good practices among the building users.

283. A Planning Stage Whole Life Cycle Assessment, containing detailed unregulated carbon emissions calculations, should be conducted as part of the compliance with the 'Be Seen' policies and guidance. This matter is discussed in the following 'Whole life cycle and carbon capture' section of this report.

### Total energy savings

284. The proposal would reduce on-site regulated carbon dioxide emissions by 40% over a notional building minimally compliant with the Building Regulations 2013. The total per annum shortfall in savings relative to carbon zero would be 175 tonnes per year which, at a rate of £95/tonne for 30 years, generates an offset contribution of £498,750. This payment will be secured through the Section 106 Agreement.

285. The energy savings, as detailed above, which take into account SAP10 and decarbonising of the electricity grid, demonstrate the strong energy-saving and sustainable credentials of the proposed development. To ensure these savings are realised, the Section 106 Agreement will include two obligations, one requiring the development to be constructed in accordance with the Energy Statement and the other verifying the delivery of the carbon savings through a post-installation review process.

### Whole life cycle and carbon capture

286. London Plan Policy SI2 requires a calculation of whole life cycle carbon emissions through a nationally recognised Whole Life Cycle Carbon Assessment. This captures a development's embodied emissions, its unregulated emissions, and the carbon impact of mid-life maintenance and end-of-life dismantling.
287. Having been constructed in the 1980s, the existing office building is dated, with inefficient and inflexible floorspace. The sustainability performance of the existing building is low, with outdated mechanical and electrical infrastructure, as well as a poor performance façade system.
288. Rather than demolish the existing building and undertake wholesale redevelopment, the application proposes to inherit and re-use most of the foundations and structural elements of the existing building. This would reduce total waste, which in turn would lessen the embodied carbon footprint. In total, 72% of the existing building would be retained and repurposed. Retaining parts of the existing buildings in this way has the added benefit of reducing the total number of vehicles movements connected with the demolition and construction stages.
289. In terms of building design, the whole-life carbon footprint has been reduced by optimising the massing, specifying a high performance façade, providing efficient building services, enhancing biodiversity and optimising the public realm.
290. In the building operation phase, it is proposed to drive down unregulated emissions through efficient appliances, energy re-use, applying control updates and future-proofing connection to a District Heating Network.
291. Notwithstanding the above-mentioned respects by which embodied emissions, unregulated emissions, and the carbon impact of mid-life maintenance and end-of-life dismantling would be reduced, the applicant has not provided a calculation of whole life cycle carbon emissions in accordance with the nationally recognised standard. However, given that the planning application was validated before the adoption of London Plan Policy SI2, it is



acceptable in this particular case to require the submission of the Planning Stage Whole Life Cycle Assessment by planning condition.

### Circular Economy

292. Policy GG5 of the London Plan 2021 promotes the benefits of transitioning to a circular economy as part of the aim for London to be a zero-carbon city by 2050. Policy D3 requires the principles of the circular economy to be taken into account in the design of development proposals in line with the circular economy hierarchy.
293. The submitted Circular Economy statement summarises the proposed approach and actions taken up to RIBA stage 3 (developed design) for the proposal, as well as the proposed measures and monitoring/reporting mechanisms that will be implemented through the development's life cycle.

### Start and end of building life

294. To explain how the materials, components and products to be used in the construction of the development will not only be sourced, but also disassembled and disposed of at the end of their useful life, the applicant has provided the following suite of documents:
- a Pre-Demolition / Refurbishment Audit;
  - a Bill of Materials, which describes the materials to be used in the construction of the development and their provenance, including a commitment for recycled content to comprise at least 20% of the total;
  - Transport Carbon Intensity Calculations, which breaks down the transport-related emissions generated by each sub-element of the building structure;
  - a Materials and Products Life Cycle Assessment;
  - a Building End-of-Life Strategy, which includes proposals for the long-term storage of the BIM model along with material specification and manufacturer's data sheets;
  - a Recycling and Waste Reporting table, including an acknowledgement of the Mayor's policy targets of recycling and reusing 95% of construction, excavation and demolition waste.

### Mid-life building adaption

295. A Functional Adaptability Strategy supports the application, which sets out the measures taken to accommodate future changes of use of the building over its lifespan. This covers feasibility, accessibility, versatility, adaptability, convertibility, expandability and refurbishment. Among other things, the Strategy explains that:

- spaces have been designed for easy amalgamation or subdivision, and to accommodate alternative use classes without a major rework or changes to the external façade or structure;
- construction materials and finishes have been specified that need less frequent maintenance, repair or replacement;
- designs have been standardised to enable future reuse and upgrade of materials; and
- MEP capacity and requirements have been futureproofed and would allow for changes of use.

#### *In-Use Waste and Recycling Management*

296. The applicant's Sustainability Strategy (page 33) and Delivery and Servicing Plan (page 11) together explain how recycling and re-use will be maximised, and waste production minimised, in the day-to-day operation of the development. Commitments include:

- provision of separate waste storage facilities for general waste recyclables and food/compostable waste;
- a dedicated facilities manager/team will ensure waste is stored appropriately and transferred in good time prior to collection;
- staff being made aware of the waste and recycling regime for the office;
- keeping waste in the appropriate storage locations at all times, and transferring it to the kerbside only at collection times.

297. Operational waste and recycling estimates were not available at the time the Circular Economy Statement was produced, but the development will target BREEAM credit Wst 03 'Operational Waste', which is sufficient.

#### *Summary*

298. The development meets the requirements of Policies D3 and SI7 of the London Plan 2021, achieving a Building Circularity score of 37%.

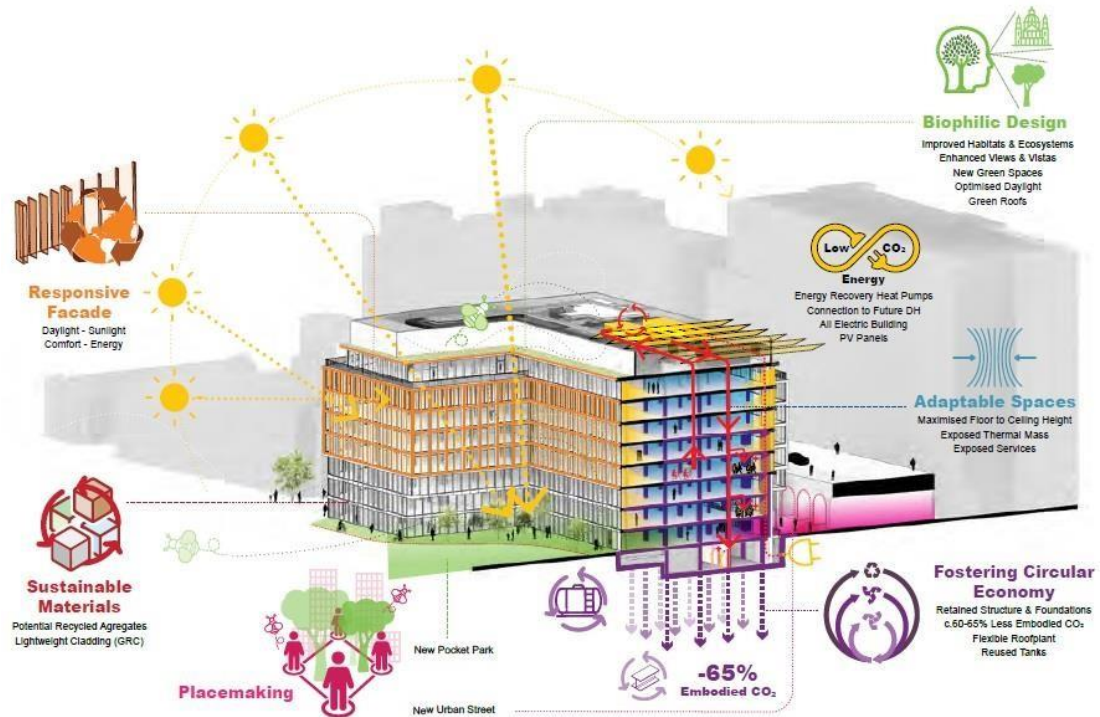


Figure 20 (above): Diagram depicting the key elements of the energy and sustainability strategy.

## Overheating

299. London Plan Policy SI4 and Policy P68 of the emerging NSP set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The six-step hierarchy is as follows:

- minimise internal heat generation through energy efficient design; then
- reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
- manage the heat within the building through exposed internal thermal mass and high ceilings; then
- use passive ventilation; then
- use mechanical ventilation; then
- use active cooling systems (ensuring they are the lowest carbon options).

300. The steps set out in the hierarchy have been applied to the office and retail elements of the proposal in sequence and systematically as part of the design process. This is set out below in sequential order.

Minimise internal heat generation through energy efficient design

301. Internal heat generation is to be minimised by a combination of measures, including minimising cold bridging, exposing the concrete structure wherever possible to optimise thermal mass, and the building being all-electric with heat pumps and instantaneous electric water heaters providing all on-site energy generation.

Reduce heat entering the building

302. The heat entering the proposed development is to be reduced by a combination of measures. These include the low 'U' (thermal transfer) values of the facade, improved air tightness throughout the building, and the high- performance 'G' values of the double-glazed curtain wall system complemented by external shading devices to reduce solar gain ingress.

Manage the heat within the building

303. The existing concrete structure of the building is to be retained, with generous to floor to floor heights achieved and building fabric left exposed where possible. Furthermore, extensions on the west and south elevations are suspended on pre-cast concrete columns. This dense construction will allow summertime heat to be absorbed during the daytime and released in the evening.

Use passive ventilation

304. The office would be ventilated using mechanical cooling via fan coil units served by heat pumps, with the retail space to rely on a zonal extraction unit with heat recovery. A passive natural ventilation strategy –whereby cooling would be achieved at least in part through openable windows– was reviewed by the applicant but precluded by noise and air quality issues arising from the proximity of Southwark Bridge Road.

Use mechanical ventilation

305. Mechanical ventilation via roof-mounted Air Handling Units (AHU) will provide fresh air to the commercial office areas and extract moisture/pollutants. The AHU would incorporate heat recovery to ensure efficient operation.

Use active cooling systems (low carbon)

306. While the cooling hierarchy set out above would significantly reduce the need for cooling, the steps taken would not be sufficient to avoid overheating risk throughout the year in either the office or retail elements of the proposed development. As such, active cooling would be required in the form of fan coil

units. This active cooling technology would use highly efficient low carbon air source heat pumps.

### Summary

307. Following the cooling hierarchy, the applicant has demonstrated that the cooling demand has been reduced to less than the Part L 2013 Baseline (Notional) building. Overheating risk has been addressed through extensive thermal modelling, which demonstrates compliance with the CIBSE TM52 methodology under current and future climate scenarios up to 2080.

### BREEAM

308. Strategic Policy 13 of the Core Strategy requires both the office and retail elements of the development to achieve a BREEAM “excellent” rating. A BREEAM Pre-assessment report has been undertaken (this is contained within Appendix A of the applicant’s Sustainability Statement, dated January 2021). It demonstrates that “excellent” can be achieved for the commercial use types, thus meeting the policy requirement. A condition to secure this is therefore recommended.

### Water efficiency

309. The applicant’s Sustainability Statement confirms that the commercial uses would achieve at least the BREEAM ‘excellent’ standard for the ‘Wat 01’ water category and incorporate measures to achieve lower water consumption. Such water saving devices would include:

- pulsed output water meters will be installed at the site boundary and the building entry points to provide leak detection;
- water sub meters will be installed to allow metering of high-water consuming plant and areas within the building;
- sanitary fittings to regulate/minimise water consumption to at least 40% below the BREEAM benchmark;
- Dual flush WCs; and
- Reduced-flow taps and showers.

310. The proposed strategy complies with Policy SI5 (Water Infrastructure) of the London Plan 2021.

### **Digital connectivity infrastructure**

311. The NPPF recognises the need to support high-quality communications infrastructure for sustainable economic growth and to enhance the provision of local community facilities and services.

312. To ensure London's long-term global competitiveness, Policy SI6 (Digital Connectivity Infrastructure) of the London Plan 2021 requires development proposals to, amongst other things, be equipped with sufficient ducting space for full fibre connectivity infrastructure, meet expected demand for mobile connectivity, avoid reducing mobile capacity in the local area.
313. The proposal includes two telco incomer rooms (connected to utility companies ducts in Park Street) providing tenants with options for diverse fibre connections to their floors. The level of information submitted demonstrates that digital connectivity has been adequately considered at the planning stage, meeting the requirements of Policy SI6. A compliance condition is recommended, requiring the development to be constructed in accordance with the infrastructure plans.

### **Socio-economic impacts**

314. London Plan Policy E11 requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases. This requirement is also covered by Saved Policy 1.1. of the Southwark Plan and Policy P27 of the emerging NSP, with the methodology for securing these opportunities prescribed by the Council's Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015 with 2017 Addendum)
315. In accordance with the policy framework, there would be a requirement for this development to deliver during the construction phase 18 sustained jobs to unemployed Southwark residents, 418 short courses, and 4 construction industry apprentices. Upon completion, 51 sustained jobs for unemployed Southwark Residents would also be required. These obligations will be secured through the Section 106 Agreement.
316. In terms of direct employment, the proposed uplift in office floorspace has the potential to deliver 775 FTE extra positions and retail unit has the potential to create up to 8 FTE positions. The workers would also generate considerable spend in shops and services in the local area, which is a major and enduring benefit of the development.

### **Planning obligations**

317. Saved Policy 2.5 of the Southwark Plan 2007 advises that planning obligations should be secured to overcome the negative impacts of a generally acceptable proposal. The policy is reinforced by the Section 106 Planning Obligations and CIL SPD 2015 (with 2017 update), which sets out in detail the type of development that qualifies for planning obligations.

318. In accordance with the Section 106 Planning Obligations and CIL SPD, the following contributions have been agreed with the applicant in order to mitigate the impacts of the development:

<b><u>Planning Obligations: Summary Table</u></b>	
<b><u>Obligation</u></b>	<b><u>Mitigation / Terms</u></b>
<b>Archaeology</b>	
ARCHAEOLOGY: MONITORING CONTRIBUTION	A sum of <b>£11,171</b> by the developer on signing of the Section 106 Agreement towards monitoring and providing technical archaeological support during the works on and in the vicinity of the site.
	Applicant's Position: <b>AGREED</b>
HERITAGE ASSET PROMOTION CONTRIBUTION	A sum of <b>£120,150</b> (Index linked) to be paid by the Developer towards protecting, promoting and enhancing heritage assets within the vicinity of the Development, in particular the Globe Theatre and the Rose Theatre.
	Applicant's Position: <b>AGREED</b>
<b>Local Economy: Employment and Training</b>	
CONSTRUCTION PHASE JOBS/ CONTRIBUTIONS	Development to: <ul style="list-style-type: none"> <li>- Deliver <b>18 sustained jobs</b> to unemployed Southwark residents,</li> <li>- Deliver <b>18 short courses</b>, and;</li> <li>- Take on <b>4 construction industry apprentices</b> during the construction phase.</li> </ul> <p>Or make the pro-rata Employment and Training Contribution which, at maximum, would be £86,100. This breaks down as:</p> <ul style="list-style-type: none"> <li>- <b>£77,400</b> against sustained jobs;</li> <li>- <b>£2,700</b> against short courses, and;</li> <li>- <b>£6,000</b> against construction industry apprenticeships.</li> </ul>
	Applicant's Position: <b>AGREED</b>

<p>CONSTRUCTION PHASE EMPLOYMENT, SKILLS AND BUSINESS SUPPORT PLAN</p>	<p>The Plan would be expected to detail:</p> <ul style="list-style-type: none"> <li>- Methodology of training, skills, support etc.</li> <li>- Targets for construction skills and employment outputs</li> <li>- Methodology for delivering apprenticeships</li> <li>- Local supply chain activity methodology</li> </ul> <p>Applicant's Position: <b>AGREED</b></p>
<p>POST-COMPLETION (IN-USE) PHASE JOBS AND TRAINING</p>	<p>The development is to deliver <b>51 sustained jobs</b> to unemployed Southwark residents,</p> <p>Any shortfall is to be met through the End Use Shortfall Contribution which, at maximum, would be <b>£219,300</b>. This is calculated on the basis of £4,300 per job.</p> <p>Applicant's Position: <b>AGREED</b></p>
<p>POST-COMPLETION (IN-USE) PHASE JOBS/ CONTRIBUTIONS</p>	<p>The Plan would be expected to detail:</p> <ul style="list-style-type: none"> <li>- Methodology for filling the Sustained Employment Opportunities (SEOs) and apprenticeships roles</li> <li>- Milestones and profiles for filling the SEOs and apprenticeships</li> <li>- Identified skills and training gaps to gain sustained employment in the completed development</li> <li>- Methods to encourage applications from suitable unemployed Borough residents by liaising with the local Jobcentre Plus and employment service providers</li> </ul> <p>Applicant's Position: <b>AGREED</b></p>
<p><b>Local Economy: Affordable Workspace</b></p>	
<p>INITIAL UNITS – QUANTUM AND LOCATION</p>	<p>The dedicated affordable workspace is to comprise:</p> <ul style="list-style-type: none"> <li>- Ground Floor Unit (North), 207 sq. metres GIA;</li> <li>- Ground Floor Unit (South), 99 sq. metres GIA;</li> <li>- First Floor Unit, 382 sq. metres GIA; and</li> <li>- the associated communal/circulation spaces.</li> </ul> <p>These are to be known as the “initial units”.</p>



	<p>All ancillary and servicing areas are to be available to the relevant affordable workspace occupants on the same terms/basis as the market office occupiers.</p>
	<p>Applicant's Position: <b>AGREED</b></p>
FUTURE UNIT – QUANTUM AND LOCATION	<p>The developer shall make reasonable endeavours to provide affordable workspace (the “future units”) within four of the arches adjacent to the site, subject to securing the necessary agreement with the owners (Trustees of Bridge House Estates) and the owners not being required to be a signatory to a S106 agreement.</p> <p>In the event of the future units being successfully brought forward, an equivalent quantum of floorspace within the “initial units” can be returned to market rate office space, subject to the overall amount of affordable workspace across the development site remaining at no less than 777.7 sq. metres GIA.</p>
	<p>Applicant's Position: <b>AGREED</b></p>
LIFETIME AND RENT LEVELS	<p>The affordable workspace is to be provided, at the rental levels set out below, for a fixed term commencing upon first operation of the affordable workspace unit in question and terminating no sooner than 30 years (without interruption) thereafter.</p> <p>Rental levels of the affordable workspace are to be:</p> <ul style="list-style-type: none"> <li>- 0-11 months at <b>peppercorn rent</b>;</li> <li>- 12 months until the end of the affordable workspace lifetime at no more than <b>75% Local Open Market Rent for equivalent space</b>;</li> </ul> <p>(excluding any rates and reasonable service and building management charges) (Indexed Linked from date of Agreement) per square foot net lettable area per annum.</p>
	<p>Applicant's Position: <b>Not yet agreed</b></p>
TENANT ELIGIBILITY	<p>Eligible tenants shall be, as per the definition given in the NSP, from a specific sector that has a social, cultural or economic development purpose. This would include:</p>

	<ul style="list-style-type: none"> <li>- charities, voluntary and community organisations or social enterprises;</li> <li>- creative and artists' workspace;</li> <li>- rehearsal and performance space and makerspace;</li> <li>- occupiers for disadvantaged groups starting up in any sector;</li> <li>- occupiers in support of educational outcomes through connections to schools, colleges or higher education;</li> <li>- existing businesses in Southwark who need to relocate;</li> <li>- small businesses located in Southwark; and</li> <li>- start-ups or small businesses otherwise identified by the workspace provider to be agreed with the council.</li> </ul> <p>The Affordable Workspace Provider will retain discretion over the selection of the eligible tenants that take leases within the affordable workspace areas.</p>	
	<p>Applicant's Position: <b>AGREED</b></p>	
<p>KEY TERMS OF LEASE</p>	<p>Rent Review</p>	<p>Five yearly upward only, RPI linked.</p>
	<p>Service charges</p>	<p>Cap in negotiation</p>
	<p>Break clause</p>	<p>For both the landlord and the tenant, a 3 year break on a minimum 5 year lease.</p> <p>Landlord and tenant break clause in the event that AW tenants are required to move into the arches.</p>
	<p>Applicant's Position: <b>Agreed on rent review and break clause; service charges cap still in negotiation</b></p>	
<p>MINIMUM SPECIFICATION OF UNIT(S)</p>	<p>Prior to occupancy, each affordable workspace unit is to be provided to the Council's minimum specification. It prescribes the standards of:</p> <ul style="list-style-type: none"> <li>- Fit-out (floor, ceiling, windows, doors, power, lighting etc.) specification at point of occupancy</li> <li>- Telecommunications</li> </ul>	

	<ul style="list-style-type: none"> <li>- Means of escape</li> <li>- Lifts</li> <li>- Delivery/servicing arrangements</li> <li>- Cycle Storage</li> <li>- Regulations (DDA etc.) compliance</li> </ul>
	Applicant's Position: <b>AGREED</b>
FINAL MANAGEMENT PLAN	<p>Produce and submit a Final Affordable Workspace Management Plan.</p> <p>In the event that the developer decides not to manage the day-to-day operation of the workspace, a Workspace Provider shall be appointed to fulfil this role and submit a Final Affordable Workspace Management Plan detailing their management plan.</p>
	Applicant's Position: <b>AGREED</b>
FINAL MARKETING PLAN	<p>Produce and submit a Final Affordable Workspace Marketing Plan.</p> <p>In the event that a Workspace Provider is appointed to manage the workspace, the Provider shall submit a Final Affordable Workspace Marketing Plan detailing their marketing plan.</p>
	Applicant's Position: <b>AGREED</b>
<b>Transport Impacts Mitigation</b>	
LOCAL PUBLIC REALM UPGRADES CONTRIBUTION	<p>The developer is to pay a contributory sum of <b>£40,000</b> towards necessary local public realm improvements to the Borough Road Network and the TLRN. The sum breaks down as follows:</p> <ul style="list-style-type: none"> <li>i. <b>£30,000</b> towards the provision of traffic calming measures (in the form of 3 humps or raised treatments) on Park Street; and</li> <li>ii. <b>£10,000</b> towards the reconstruction of the existing raised table on Park Street located approximately 25 metres west of the junction with Porter Street.</li> </ul> <p>Works are to be carried out by the relevant highway authority within the next 5 years.</p>

	Applicant's Position: <b>AGREED</b>
TfL DOCKING STATION CONTRIBUTION	<b>£50,000</b> to contribute towards expansion of the TfL cycle docking station scheme in the vicinity of the site Applicant's Position: <b>AGREED</b>
LEGIBLE LONDON SIGNAGE	<b>£20,000</b> to contribute towards provision of Legible London signage within the vicinity of the site. Applicant's Position: <b>AGREED</b>
BUS SERVICES CONTRIBUTION	<b>£40,000</b> to contribute towards bus services within the vicinity of the site. Applicant's Position: <b>AGREED</b>
CYCLE LANE FEASIBILITY STUDY AND IMPLEMENTATION	<b>Sum (to be confirmed)</b> to contribute towards: <ul style="list-style-type: none"> <li>• a feasibility study into the implementation of a right turn cycle lane at the junction of Southwark Bridge Road and Sumner Street; and</li> <li>• the implementation of such a scheme should it be deemed feasible.</li> </ul> Applicant's Position: <b>AGREED</b>
DELIVERY AND SERVICING MANAGEMENT BOND	For a period of two years from 75% occupancy the daily vehicular servicing activity of the site is to be monitored and returns made on a quarterly basis. If the site meets or better its own baseline target the Delivery and Servicing Management Bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the Council to utilise for sustainable transport projects in the ward of the development. The Bond will be <b>£27,620</b> , calculated on the basis of the GFA of commercial floorspace. The Bond is to be paid to the Council prior to occupation of any part of the development. The Council will retain £1,600 of the £27,620 Bond for

	<p>assessing the quarterly monitoring. This means the refundable sum will be £26,020.</p> <p>Applicant's Position: <b>AGREED</b></p>
<p><b>BLUE BADGE RESTRICTION</b></p>	<p>The two parking spaces shall be reserved exclusively for Blue Badge holders.</p> <p>Prospective occupiers of the commercial (market and affordable) floorspace and all other uses, shall be notified that the parking spaces will be prohibited from use except by Blue Badge holders. This notification shall be provided in the material used for marketing and the terms of all leases.</p> <p>Applicant's Position: <b>AGREED</b></p>
<p><b>Highway Impacts Mitigation</b></p>	
<p><b>SCOPE OF WORKS</b></p>	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to submit the s278 specification and estimated costs to the Local Highways Authority for approval. This shall comprise the following works, and all shall be constructed in accordance with SSDM standards:</p> <ul style="list-style-type: none"> <li>- repave the footway including new kerbing fronting the development on Park Street;</li> <li>- construct three vehicle crossovers on Park Street;</li> <li>- upgrade street lighting fronting the development on Park Street to current LBS standards;</li> <li>- reconstruct/resurface the Park Street carriageway from Southwark Bridge Road to the eastern boundary of 46-48 Park Street (reconstruction to be assessed against a full inspection survey before works start);</li> <li>- reinstate the redundant vehicle access at the south eastern side of the development as footway; and</li> <li>- repair any damages to footways, kerbs, inspection/utility covers, gullies and street furniture within between Southwark Bridge and Porter Street due to construction activities including construction work and the movement of construction vehicles (Applicant to note that in all</li> </ul>

	probability the Park Street carriageway will need to be reconstructed either from sub-base or base course level following construction activities).
	Applicant's Position: <b>AGREED</b>
DETAILED DESIGN	Prior to implementation (with the exception of any site clearance/demolition and archaeological investigative works), the developer is to submit the 'Highway Works Specification and Estimated Costs' for approval.
	Applicant's Position: <b>AGREED</b>
S278 AGREEMENT	Prior to commencement of the agreed highway works, the developer is to enter into a Highway Agreement under Section 278.
	Applicant's Position: <b>AGREED</b>
DELIVERY	All works agreed under the Highway Agreement shall be completed within the agreed timeframe.
	Applicant's Position: <b>AGREED</b>
<b>Publicly-accessible Realm</b>	
DETAILED DESIGN	<p>Prior to implementation, the developer is to submit a Public Realm Specification for all areas of publicly-accessible realm to the Local Planning Authority and receive its approval. The Public Realm Specification shall demonstrate that the publicly-accessible realm has been designed to an adoptable standard (in accordance with the SSDM) and shall comprise:</p> <ul style="list-style-type: none"> <li>- detailed drawings (plans, sections, levels etc.);</li> <li>- details of street furniture (cycle stands, seating, bollards etc.);</li> <li>- details of planting;</li> <li>- details of external lighting and CCTV;</li> <li>- details of boundary enclosure and entry gates;</li> <li>- finishes schedules and samples of proposed materials;</li> <li>- demonstration that principles of Secured by Design have been incorporated; and</li> </ul>

	<ul style="list-style-type: none"> <li>- details of the phasing and timing for delivery.</li> </ul>
	Applicant's Position: <b>AGREED</b>
DELIVERY AND SHORT-TERM MANAGEMENT	<p>Upon receipt of a Provisional Completion Certificate from the Local Planning Authority, the developer shall open the publicly-accessible realm.</p> <p>Any defects within the first 12 months of opening are to be rectified by the developer.</p> <p>At the end of the initial 12 month period, the developer is to seek and receive from the Local Planning Authority a Final Completion Certificate.</p>
	Applicant's Position: <b>AGREED</b>
LONG-TERM MANAGEMENT	<p>Prior to first use of the pocket park, the developer shall have received the Council's approval of a Joint Design &amp; Management Framework, which shall:</p> <ul style="list-style-type: none"> <li>- demonstrate that the public realm space has been co-designed to ensure it is future proofed in the event that Red Lion Court is redeveloped with public space provided along its western boundary;</li> <li>- confirm the arrangements, developed between the parties, for removing the boundary fence between the sites in the event that Red Lion Court is redeveloped; and</li> <li>- detail a joint management and maintenance strategy, developed between the parties, which includes agreement over: <ul style="list-style-type: none"> <li>i. closure dates, timings and security of proposed gates to ensure any joint space is coherent and presents an inviting and legible space for public use;</li> <li>ii. the optimum approach to gradients and other design issues that impact Red Lion Court; and</li> <li>iii. MEWP usage.</li> </ul> </li> </ul> <p>The developer covenants to manage, maintain and allow public access except for a limited period in certain circumstances (fire, flood, carrying out of essential maintenance etc.).</p>

	<p>Applicant's Position: <b>Agreed to the Joint Design &amp; Management Framework; agreed in principle to the final requirement relating to maintaining/managing the pocket park and allowing public access, subject to the covenant expiring or terminating upon the end of the Applicant's lease on the building</b></p>
HOURS OF ACCESS	<p>The publicly-accessible pocket park shall be open between 08:00hrs and 20:00hrs every day of the week including Bank Holidays.</p> <p>All other areas of publicly-accessible realm within the application site shall be open 24 hours a day every day of the week including Bank Holidays.</p> <p>Applicant's Position: <b>AGREED</b></p>
RIGHTS OF CLOSURE	<p>The developer shall be entitled to close the publicly-accessible realm (with prior notification to members of the public) for up to one day per year so as to prevent public rights of way being obtained.</p> <p>The developer shall be entitled to close all parts of the pocket park for up to 6 events per year (and of those no more than 2 days shall be in any calendar month).</p> <p>Applicant's Position: <b>AGREED</b></p>
<b>Energy and Sustainability</b>	
FUTUREPROOFED CONNECTION TO DISTRICT CHP	<p>Prior to occupation, a CHP Energy Strategy must be approved setting out how the development will be designed and built so that all parts of it will be capable of connecting to any future District CHP.</p> <p>Applicant's Position: <b>AGREED</b></p>
CARBON OFFSET	<p><b>£498,750</b> in-lieu payment for a total shortfall of 175 tonnes/CO2 (calculated at a rate of £95/tonne for 30 years).</p> <p>Development as built is to achieve the carbon reduction, as set out in the submitted Energy Statement.</p>



	Applicant's Position: <b>Agreed in principle subject to the ability to submit a final equivalent 'As-Built' Energy Statement to the Council upon which the final 'Carbon Offset' payment will be confirmed.</b>
REVIEW OF INSTALLED ENERGY MEASURES	<p>Post-installation review to verify the carbon savings delivered with an upwards only adjustment to the carbon offset fund contribution if required.</p> <p>Applicant's Position: <b>Not agreed. Applicant requests that this obligation include provision to reduce the predicted carbon offset payment as an incentive to improve the scheme through the remaining design and construction stages.</b></p>
<b>Administration</b>	<p>Payment to cover the costs of monitoring these necessary planning obligations (with the exception of those that have monitoring contributions already factored-in), calculated as 2% of total sum.</p> <p>Applicant's Position: <b>AGREED</b></p>

319. These obligations are necessary to make the development acceptable in planning terms, mitigating for its adverse impacts. In the event that a satisfactory legal agreement has not been entered into by 7<sup>th</sup> January 2022 it is recommended that the Director of Planning and Growth refuses planning permission, if appropriate, for the following reason:

*"The proposal, by failing to provide for appropriate planning obligations secured through the completion of a Section 106 Agreement, fails to ensure adequate provision of mitigation against the adverse impacts of the development through projects or contributions in accordance with: Policy DF1 (Delivery of the Plan and Planning Obligations) of the London Plan 2021; Strategic Policy 14 (Delivery and implementation) of the Core Strategy 2011; Saved Policy 2.5 (Planning Obligations) of the Southwark Plan 2007, and; Southwark Council's Planning Obligations and Community Infrastructure Levy SPD 2015."*

### **Mayoral and Borough Community Infrastructure Levies**

320. 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 Borough CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, while the Borough CIL will provide for infrastructure that supports growth in Southwark.

321. Due to waiting on detailed floorspace information from the applicant, at the time of publishing this report the CIL Team was unable to provide Mayoral CIL and Borough CIL estimates for the proposed development. The applicant will be expected to submit CIL 'Additional Information' and 'Assumption of Liability' forms after planning approval has been obtained and pay the applicable levies at the relevant trigger points.

### **Development description**

322. The proposed development was originally:

*Refurbishment, recladding and extension of the existing office (Use Class E) building to provide an additional storey at roof level to a maximum AOD height of 37.5m, infill extension to the west elevation at levels 2 to 6, infill extension to the east elevation at levels 3 to 6 and extension to the south elevation at levels 3 to 6 to provide office floorspace (Use Class E) with first floor retail unit(Use Class E), introduction of roof terraces at level 07, creation of external plant room at roof level, provision of cycle parking, servicing, refuse and plant areas, provision of new publicly accessible routes through the site, provision of new hard and soft- landscaped public realm improvements and other associated works.*

323. Post public consultation, the LPA and applicant agreed to simplify the development description. Separately, Condition 1 (Scope of Works) of the draft decision notice describes the key elements of the proposal in more detail, including with use class references.
324. This arrangement of an accurate but simplified development description supported by a more specific Scope of Works condition responds to the Court of Appeal's reversal of the High Court's decision in *Finney v Welsh Ministers* [2019] EWCA Civ 1868. It will enable the applicant to seek amendments to the extant consented proposal by varying Condition 1 (under Section 73 of the Town and Country Planning Act) without any risk of the sought variation conflicting with the development description. Had the development description remained in its original very detailed format, any changes the applicant later wished to make falling outside the wording of the operative part of the grant would have necessitated the submission of a fresh full planning application.

## Community involvement and engagement

325. This application was accompanied by a Statement of Community Involvement. The documents confirm that the following public consultation exercises were undertaken by the applicant prior to submission of the application:

- 05/10/20 – Email invitation to meet the local ward councillors;
- 28/10/20 – Digital meeting with Cllr Adele Morris;
- 29/10/20 – Letters advertising the webinar for Anchor Terrace residents distributed by hand;
- 02/11/20 – Delivery of 781 flyers to neighbouring properties notifying them of the online consultation;
- 05/11/20 – Email invitation with details of the online consultation to the local ward councillors;
- 06/11/20 - Digital meeting with Cllr Johnson Situ;
- 19/11/20 – Digital meeting with Living Bankside;
- 23/11/20 – Digital meeting with the Anchor Terrace Freeholder Ltd;
- 01/12/20 – Digital meeting with Better Bankside; and
- 11/12/20 – Consultation with Southwark Regeneration Team

326. In addition, a website was created and has been live since November 2020 featuring information about the scheme, and has elicited 54 online survey responses. The applicant also made efforts to engage with local community groups such as Living Bankside and Better Bankside, as well as nearby residents and businesses.

327. Issues and requests raised as result of the public consultation included:

- the rooftop terraces could cause overlooking;
- noise and other disruption may arise unless servicing and deliveries take place within 'working hours only';
- the duration of the build, and the attendant amenity impacts on local residents, is a concern;
- aspects of the design are not well-resolved and the building is at risk of not ageing well;
- offices may not be in demand due to the impact of COVID;
- homes might be a better use to provide on this site;
- the developer should fund highways improvements, especially on Southwark Bridge Road; and
- the proposal should aim to improve public access and permeability.

328. As part of its statutory requirements, the Council sent letters to surrounding residents, issued a press notice publicising the planning application and displayed notices in the vicinity of the site. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to

participate in the planning process.

329. Details of consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices. The responses received are summarised in an earlier part of this report. The main 'Assessment' part of this report addresses the issues raised.

### **Consultation responses from internal and divisional consultees**

330. The key matters raised by responses from internal and divisional consultees are summarised below. It should be noted that, in each case, the final /most recent consultation response is provided. An officer's response has been provided to each.

331. Archaeologist:

- No objection, subject to appropriate conditions and obligations relating to monitoring and the Heritage Asset Promotion Fund (note: the Archaeologist's detailed comments have been provided in the section of this report entitled 'Archaeology').
  - **Officer response:** All suggested conditions and obligations will be secured.

332. Ecology Team:

- At only 0.12, the UGF score is low. The recommended minimum score is 0.30. The main area for greening is the roof. The design provides 396 square metres of green roof on level 8. If further green roof could be installed on top of the new floor this would improve the score. If it is not possible to provide additional greening and the reasons are sound, a contribution to green infrastructure in the Bankside area is advised.
  - **Officer response:** Due to spatial requirements of plant and environmental technologies, there is no scope to provide further greening on the roof. As a refurbishment and extension proposal on a constrained site, and taking into account the provision of a generously-proportioned new publicly-accessible green space within the proposal, it is considered that the scheme provides sufficient greening, open space and biodiversity benefits such that a financial contribution is not warranted in this instance.
- increasing the number of swift bricks will provide more net gain
  - **Officer response:** The applicable planning condition has been worded to require details of "at least" ten Swift boxes and "at least" two Red Start boxes, allowing for the detailed design to include more than ten and two respectively should this be possible.

## 333. Environmental Protection Team:

- No objection, subject to recommended conditions relating to limiting the use of the commercial roof terraces, servicing, lighting, ventilation, contamination and construction environmental management
  - **Officer response:** All suggested conditions have been included on the Draft Decision Notice.

## 334. Flood Risk Management Team:

- No objections to the principles and majority of content within the outline Drainage Strategy. However, further information is required, and as such a Final Drainage Strategy should be secured by condition.
  - **Officer response:** The suggested condition has been included on the Draft Decision Notice.

## 335. Highways Construction Management Plans Team:

- Two CEMPs (one for enabling works, one for main works) were submitted with the application but required amendment. Updated versions were supplied by the applicant in late August 2021, but there is insufficient time for the Highways Construction Management Plans Team to assess the documents before the Planning Committee. As such, conditions should be imposed requiring approval of these documents at the relevant trigger point.
  - **Officer response:** The Enabling Works CEMP will be required as a 'pre-commencement' condition, while the Main Works CEMP will be required as a 'prior to above grade works' condition.

## 336. Highways Development Management and Highways Licensing Teams:

- Pedestrian inter-visibility of 2 metres x 2 metres must be provided at the vehicle access into the onsite loading yard. These should also be shown on a drawing. There should be no obstruction within the visibility play area.
  - **Officer response:** Drawings have been submitted by the applicant (refer to page 25 of 'Technical Note 01 - Response to Transport Consultation Comments', dated 14.07.2021) demonstrating that the requisite pedestrian inter-visibility would be achieved.
- If consent is granted the developer must enter into a Section 278/38 Agreement to complete various works to the footways and highways in the vicinity of the site (these are listed in the 'Planning Obligations: Summary Table' in an earlier part of this report).
  - **Officer response:** The developer has agreed to the requested works. Completion of these works as part of the separate

subsequent Section 278/38 works has been included as an obligation within the Section 106 Agreement.

- All streets and spaces must be surfaced in conformity with the SSDM (adoptable) standards, surfacing design must ensure no surface water flows onto public highway, and a joint condition survey should be conducted by the applicant in collaboration with the Highway Development Team.
  - **Officer response:** All these general comments are noted, and will be captured on the decision notice as informatives.

#### 337. Local Economy Team:

- The developer must deliver 18 sustained jobs, 18 short courses, and take on 4 construction industry apprentices during the construction phase. A contribution must be paid in lieu of this provision, commensurate to the shortfall and up to a maximum of £86,100 if not delivered. The developer must also submit for approval a Construction Phase Employment, Skills and Business Support Plan.
  - **Officer response:** This is to be secured in the Section 106 Agreement.
- The developer must deliver 51 sustained jobs. A contribution must be paid in lieu of this provision, commensurate to the shortfall and up to a maximum of £219,300 (based on £4,300 per job). The developer must also submit for approval a Post-Completion Phase Employment, Skills and Business Support Plan.
  - **Officer response:** This is to be secured in the Section 106 Agreement.

#### 338. Transport Policy Team:

- The location of the two disabled spaces is questioned generally, as it would seem more logical to locate them to the front of the entrance doors so as to enable a footway of more generous width on Park Street.
  - **Officer response:** Locating the two wheelchair car parking spaces on the southern (rather than northern) side of the forecourt is the most suitable solution, as it considers the structural column constraints of the building overhang, the proximity to the main pedestrian access and reception area, and the safe operation of the layby.
- If it is not feasible to relocate the disabled car parking to the northern side of the forecourt, the arrangement should at the very least be adjusted to ensure that there is a minimum of 2.4metres-wide

unobstructed footway along Park Street (as presently proposed there are sections that would have an effective width of only 2.0 metres).

- **Officer response:** Plans depicting the requested disabled car parking/vehicle manoeuvring space reorganisation have been submitted. These show the footway widened to the requested 2.4 metres, without causing either of the two spaces to intercept the vehicle tracking through the forecourt.
- The applicant should be required to deliver 500 cycle spaces, rather than the 405 spaces offered. 500 is requested because it is a midway point between the requirements of the New London Plan and requirements of the New Southwark Plan.
  - **Officer response:** The applicant has refused the request to deliver 95 additional spaces. At pre-application stage, the applicant was advised by officers that New London Plan compliance would suffice having regard to, firstly, the proposals being a refurbishment of an existing building and, secondly, the weight attributable to the emerging New Southwark Plan at that time. While the New Southwark Plan has since gained more weight, it is still an unadopted policy so does not carry full weight. Given that the cycle storage proposals presented in the planning application documents are compliant with the New London Plan, and that to deliver a further 95 would require an entire reconfiguration of the ground floor level of the building, it is not considered reasonable to require a higher number of spaces to be delivered. Instead an informative will be attached to the Draft Decision Notice encouraging the applicant to optimise cycle storage when preparing the finalised proposals for post-decision approval.
- Details of the lift access connecting this development from Southwark Bridge Road to the building, to assist its mobility-impaired staff/patrons, should be provided from the onset as this is very critical.
  - **Officer response:** Outline plans have been provided by the applicant. Full details, to include a temporary replacement facility when the lift is undergoing maintenance, will be secured by condition.
- A CEMP and a DSP must be submitted for approval by the Council. With respect to the CEMP specifically, this should comprise for each of the two phases of the build: a site layout plan showing delivery/parking areas and position of wheel washing facilities; the use of off-site consolidation centre; engaging only transport operators with at least 'Silver' membership of FORS; restricting deliveries to times outside school arrival/departure times of 1500hrs to 1600hrs in addition to avoiding morning/evening peak traffic hours; and penalties relating to

delivery vehicles not complying with scheduled delivery times and/or not adhering to the agreed routing of vehicles

- **Officer response:** Conditions requiring these submissions have been included on the Draft Decision Notice.
- Various transport and highways related Section 106 obligations should be secured to mitigate the impacts of the development.
  - **Officer response:** Negotiations are under way with the applicant to agree on the full range of transport and highways mitigation to be secured in the Section 106 Agreement. An earlier part of this report entitled 'Planning Obligations' lists out the individual items requested by the Transport Policy Team and, for each of these items, the applicant's position at the time of this report being published is stated.

### 339. Urban Forester:

- Urban greening factor and biodiversity net gain assessments are required.
  - **Officer response:** These have been provided with the application. The UGF score is 0.12. Using the BREEAM, CEEQUAL and HQM Ecology Calculation Methodology, the ecological net gain achieved on the site is 360%. The latter is considered to be a good score; a 'BREEAM Excellent' and 'hard and soft landscaping' conditions to be attached to the Draft Decision Notice will ensure the build-out delivers these biodiversity gains. As explained in an earlier part of this report responding to the Ecology Team's consultation comments, although the UGF falls short of the New London Plan requirement of 0.30, it is considered acceptable in the specific circumstance of this case.
- The location of any attenuation tanks should be confirmed to show that any proposed landscaping is feasible.
  - **Officer response:** It is proposed to connect all the proposed surface and foul water networks to the existing combined sewer to the south at Park Street. Part of an existing underground tank beneath the pocket park would be used to provide the 35 square metres of new attenuation required (refer to page 25 of the applicant's Drainage Strategy), which is welcomed in principle from an embodied energy savings perspective. However, the exact location of the tank is not known at this time and is subject to further investigation.
- The location of any below ground services should be confirmed to show that any proposed landscaping is feasible.
  - **Officer response:** A plan of the proposed buried services has



been supplied, showing that all services would skirt the soft-landscaped part of the pocket park and thus would not compromise the delivery of sunken beds etc. necessary to support soft landscaping.

- Street tree pruning and protection measures should be secured by condition.
  - **Officer response:** Street tree pruning would be on a one-off basis to facilitate construction access, and these works can be carried out at cost by the applicant under the supervision of the Council's Arboricultural Services Team. The suggested condition relating to tree protection has been included on the Draft Decision Notice.

### Consultation responses from external consultees

#### 340. City of London

- No comments.

#### 341. Environment Agency:

- No objection subject to recommended conditions.
  - **Officer response:** All suggested conditions have been included on the Draft Decision Notice.

#### 342. GLA [Stage I response]:

The Stage I response advised that the application may comply with the London Plan, subject to further information and clarifications. As the proposal raised no strategic planning issues, in this instance, there is no need for it to be referred back to the Mayor.

Strategic transport matters referred to in the Stage I response are detailed separately in this report in the section entitled 'Transport for London'. With the exception of transport matters, each issue raised by the Stage I response is addressed below:

- The affordable workspace must be suitably located and have good access to public realm. This provision must be secured in the S106 agreement.
  - **Officer response:** The affordable workspace would occupy a good position on the building's southeast corner at ground and first floor levels. It would front onto and have access to the pocket park. Details of the affordable workspace Section 106 obligations are detailed in the separate 'Planning Obligations' section of this report.

- The Council must confirm that appropriate Fire Safety considerations have been agreed and that compliance is secured by way of condition or legal agreement.
  - **Officer response:** The Fire Compliance Statement submitted with the application outlines various fire safety considerations. The document has been authorised by a certified fire risk engineer (a Fellow of the Institute of Fire Engineers), and will be a condition of planning consent. Therefore, the relevant fire risk minimisation policies of the London Plan are deemed to have been satisfied.
- Further revisions and information are required before the proposals can be considered compliant with energy policies. Required items are:
  - i. Carbon Emissions;
  - ii. Local heat network opportunities;
  - iii. Details of the operation of the proposed communal heat network;
  - iv. Details to ensure PV has been maximised on site;
  - v. Details on proposed heat pumps; and
  - vi. Compliance with Be Seen and Whole Lifecycle carbon policies.
  - **Officer response:** Unregulated carbon emissions, Be Seen and Whole Life Cycle considerations are to be secured by planning condition. Details of the photovoltaic array are provided in appendix C of the Energy Strategy and local heat network opportunities are provided in Section 4.7 of the Energy Strategy. Details of the communal heat network and heat pumps have since been provided. The strategy is considered satisfactory.

343. London Fire Brigade:

- No comment received, no objection assumed.

344. Metropolitan Police:

- No objection subject to a pre-occupation condition.
  - **Officer response:** The suggested condition has been included on the Draft Decision Notice.

345. Thames Water:

- No objections, but five informatives should be attached to any grant of planning permission.
  - **Officer response:** All suggested informatives have been included on the Draft Decision Notice.

## 346. Transport for London:

- Contributions of £20,000 and £50,000 should be secured towards Legible London signage and cycle hire docking station expansion respectively.
  - **Officer response:** The applicant has agreed to these contributions, and they will be secured in the Section 106 Agreement.
- This provision of disabled spaces could be reduced from two to one, and remain compliant with Policy T6.5 of the London Plan 2021, or potentially both spaces could be omitted entirely with use of on-street bays instead.
  - **Officer response:** The Council's Transport Policy Team would not support reliance on on-street bays. The provision of two bays is considered acceptable, as the local area lacks accessible car parking spaces.
- Further details are required as to the location of some of the cycle parking and compliance with the London Cycling Design Standards (LCDS) is also required to accord with this policy.
  - **Officer response:** The format and split of the 405 spaces proposed at this stage in the design development are, in officers' view, compliant with the LCDS. Nevertheless, the final details of the cycle storage facilities will be secured by condition, the details submitted to discharge which will be expected to demonstrate LCDS compliance.
- The proposals perpetuate the existing arrangements regarding access between Southwark Bridge Road and Park Street. In light of this, it is crucial that other improvements to the cycling environment of the site are secured. The applicant is strongly encouraged to explore providing a safer right-turn into Sumner Street from Southwark Bridge Road, as the current junction leaves cyclists vulnerable between two carriageways which is contrary to the Mayor's vision zero.
  - **Officer response:** The applicant has agreed to fund a feasibility study. Should the outcome of the study be that a right-turn is deliverable within the CS7 enhancement project, the applicant will also make a proportionate contribution towards the delivery of the right-turn.
- Reversing waste collection vehicles into the site is contrary to Vision Zero. Measures should be introduced to minimise risk (e.g. early morning or night time collections) to pedestrians.
  - **Officer response:** The Council's Transport Policy Team considers the reversing of waste collection vehicles to be acceptable, given

that such activity would be infrequent. Early morning or night time collections would not be appropriate due to the former being a peak traffic time and the latter being unneighbourly. The proposed use of banksmen to assist all refuse collections is, in this instance, considered an acceptable mitigation measure.

- Further work is required on the Active Travel Zone assessment (ATZ) to assess against all 10 Healthy Street indicators. Working with the Council, the applicant should set out the measures they will be committing to in order to mitigate identified impacts, in line with Policy T2 of the London Plan 2021. As currently presented the applicant has not assessed against clean air and people from all walks of life for all three routes. This should be updated.
  - **Officer response:** Updated information has since been supplied to TfL, and deemed acceptable. LBS officers understand no concerns remain in this regard.
- Public realm improvements should be secured in accordance with Healthy Streets.
  - **Officer response:** In accordance with this Mayoral initiative, a range of public realm improvements have been agreed with the applicant in discussion with the Council's Transport Policy. The agreed items are listed in the 'Planning Obligations: Summary Table' in an earlier part of this report.
- A reduction in the number of vehicle crossovers should be considered.
  - **Officer response:** To accommodate Blue Badge spaces with good access to the building's main entrance, but within a constrained forecourt, there needs to be separate 'access' and 'egress' points, resulting in two crossovers. The provision of a dedicated in-plot servicing yard helps to avoid potential pedestrian conflict on the low line route alongside the arches, frees up the external space on eastern side of the site to deliver the open space envisaged by the New Southwark Plan and means that servicing vehicles are less likely to use the layby space immediately outside the main entrance. As such, it is considered that the scheme makes the best use of the Park Street frontage to deliver the various servicing and parking needs of the development. Given this, and because parking and servicing activity levels are not predicted to be high, the provision of four crossovers is considered acceptable.
- Improved cycle access between all road levels around the site and access during construction should be considered.
  - **Officer response:** The step-up between the higher level of Southwark Bridge Road and the lower level of the Thames Path

and Park Street is significant; to provide improved cycle connections between the two during the construction phase (when other various temporary highway network changes would be required to facilitate the works) would be too challenging. A further constraint is that, as part of a separate covenant, the air space above the north-to-south route must, with the exception of the existing bridge, remain unaffected by any new interventions/ structures. The applicant has offered to contribute towards a feasibility study and implementation of a right-turn cycle lane on Southwark Bridge, which would allow cyclists to loop back onto Park Street more safely; however, given that such works would need to coincide with the wider CS7 improvements works, the right-turn would not realistically be deliverable before the construction of the proposed building commences. As such, it is considered that all options for improving cycle access between the different roads levels during the construction phase have been explored.

- Servicing access will need to be appropriately managed to ensure pedestrian activity
  - **Officer response:** Any further details in this regard can be captured in the final version of the DSP, which will be secured by condition.
- A full DSP should be secured by condition in line Policy T7 of the London Plan 2021. Given the large number of pedestrians and cyclists in the Bankside area, it may be appropriate to restrict servicing activity to outside of morning and evening peaks and lunch times. Night time servicing could however be an option.
  - **Officer response:** Deliveries would, through the use of a planning condition, be restricted to 10:00hrs-20:00hrs Mon to Fri; 09:00hrs to 18:00hrs on Saturdays; and 10:00hrs to 16:00hrs on Sundays and Bank Holidays. Night time servicing would potentially cause disturbance to nearby occupiers.
- Numerous constraints will require careful consideration of the demolition and construction phases if pedestrian and cyclist safety is to be upheld. Suitable arrangements must be made to ensure convenience and safety, and for this to be achieved alongside bus operations.
  - **Officer response:** LBS officers are satisfied that, in principle, suitable arrangements can be made. The CEMP shows that the Southwark Bridge Road bus stops would need to be temporarily relocated during the construction phase to a nearby position, and that this relocation would not compromise either the convenience or safety of pedestrians and cyclists. The final CEMPs and CLPs,

which will be the subject of a condition, will be expected to devise a proposal that will protect bus operation, pedestrians and cyclists.

- Use of the river for materials in and/or waste out during construction should be considered.
  - **Officer response:** The CEMP submitted with the application has not explored options for river-based construction logistics. However, updated versions of the CEMP –one specific to demolition/enabling and one specific to the construction phases– are required by planning condition, and so this matter can be dealt with as part of those submissions.
  
- Clarity is sought on the location of the short-stay cycle parking for the commercial units and the two wide Sheffield stands that will accommodate cargo bikes.
  - **Officer response:** The short-stay parking would be in two clusters: one the pocket park and one on the forecourt. These are considered to be convenient locations for visitors to the office. While it is recognised that visitors to the retail unit arriving by bike would be unable to use the pocket park stands during the night- time hours of closure, the alternative of providing stands on the Thames Path would create an obstacle to pedestrian flow in what is a high footfall route. Cyclists visiting the retail unit earlier than 8am and later than 8pm would be able to park their bike in the stands on the forecourt. It is considered that there will be a minimal demand for the short stay spaces when the gates are closed, which will be outside of typical office hours, and the applicant has confirmed that appropriate signage will make the pocket park closing time clear to all future users. Fob or similar style access to the pocket park would be available to any employees of the retail unit or office out of hours access, so that cycle access and egress can be facilitated as required.
  
- Clarity is sought on the location of the two wide Sheffield stands that will accommodate cargo bikes.
  - **Officer response:** It is proposed to locate the wide Sheffield stands within the dedicated ground floor cycle store.
  
- The applicant should provide assessments of station assets alongside line loading assessments by using TfL NUMBAT data.
  - **Officer response:** Updated information has since been supplied to TfL, and deemed acceptable. LBS officers understand no concerns remain in this regard.
  
- As per the recommendations of the Air Quality Assessment, conditions relating to Non-Road Mobile Machinery Low Emission Zone

requirements and measures to control emissions during construction and should be secured on any decision notice.

- **Officer response:** The Air Quality Assessment will be listed on the Decision Notice as an approved plan, thereby requiring the implementation and operation of the development to comply with the measures set out within. Further, the recommended CEMP condition expressly requires compliance with up-to-date European and London low emission standards as well as the Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999; compliance with all of these will ensure construction-related emissions are controlled.
- The applicant should set out the public transport trips clearly by mode, direction of travel, line or route. The applicant should therefore break down the 'Rail' mode into National Rail and London Underground.
  - **Officer response:** Updated information has since been supplied to TfL, and deemed acceptable. LBS officers understand no concerns remain in this regard.
- The Council should ensure that the initiatives outlined with the Circular Economy Statement to reduce waste and encourage reuse are secured.
  - **Officer response:** Circular Economy conditions have been included on the Draft Decision Notice.
- A Travel Plan, a CEMP a, CLP and a DSP must be submitted for approval by the Council, the latter two in consultation with TfL (due to possible impacts on bus operations), prior to commencement.
  - **Officer response:** Conditions requiring these submissions have been included on the Draft Decision Notice. The conditions requiring submission of the CEMP and CLP have both been split into two parts: one for demolition/enabling stage and one for the construction stage.

#### 347. Twentieth Century Society

- The Twentieth Century Society's Casework Committee consider the building to be an unlisted building of significance, being of architectural merit and having historic associations with the Financial Times, a major international newspaper. In the Society's opinion, the applicant does not adequately discuss and analyse the significance of the FT building, as requested by the NPPF.
  - **Officer response:** In direct response to the Twentieth Century Society's objection, the applicant has submitted a standalone document entitled 'HERITAGE REPORT IN RESPONSE TO 20TH CENTURY SOCIETY', which officers consider provides a

comprehensive assessment of the significance. Officers agree with the conclusions that the building does not possess clear and defensible claims to significance.

- The committee feels the proposed rooftop and infill extensions will drastically alter the character and appearance of the building. The building's proportions will be completely changed, its defining external features eliminated, and its overall size and bulkiness will increase. The Society objects to the application as it will cause substantial harm to what should be considered a non-designated heritage asset. The Society would welcome a scheme which seeks to preserve more of the existing building's overall form and character.
  - **Officer response:** The section of this committee report entitled 'Context and assessment of existing building's value' addresses this matter in detail, resolving that the building does not constitute a non-designated heritage asset and that the development presents a good opportunity to improve the building's architectural and urban design qualities.

#### 348. UK Power Networks:

- UKPN has a substation at the ground floor level within this site. The applicant needs to explain how this development will affect the substation and the requisite 24-hours-a-day access to it.
  - **Officer response:** The subterranean substation would remain in its existing location and the access to it, including the means of vehicular access along the western side of the building from Park Street, would be safeguarded as part of the development proposals. A plan has been submitted demonstrating these uninterrupted access arrangements, and is considered satisfactory. A reconsultation request was sent to UK Power Networks following receipt of this additional documentation without as yet a response; it is assumed that UK Power Networks is satisfied with the information and has no further concerns.

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

349. 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.

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

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

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

### **Human rights implications**

353. 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.

354. This application has the legitimate aim of refurbishing, recladding and extending (in the form of additional storeys and infills) the existing officebuilding, providing additional office floorspace and a retail unit, supported by various ancillary facilities, new publicly-accessible realm and associated works. 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.

<b>Positive and proactive engagement: summary table</b>	
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

## CONCLUSION

355. This application would bring into productive and optimised re-use this currently vacant building, providing a complementary mixture of office and retail uses that would support the role and vibrancy of the Central Activities Zone and the Borough and Bankside District Town Centre. It would also provide a policy-compliant level of affordable workspace suitable for new and small businesses. Once operational, the development has the potential to accommodate over 750 employees, bringing significant economic benefits to the borough.
356. As expanded upon in the report, the proposed interior spaces and rooftop terraces have been designed to achieve separation distances sufficient to protect the privacy of all nearby residential properties. The proposed office and retail uses are not especially noise generating such that, with further protections secured in the form of management plans and hours of use controls, it is highly unlikely that nearby residents would experience noise disturbance. The proposal would cause daylight impacts in excess of the BRE guidance to a relatively small number of surrounding properties. However, in most cases the resulting daylight levels would not be uncommon for central London and in all instances the degree of change would not cause harm to the occupiers' amenity.
357. The proposed architecture is engaging and of sufficiently high design and material quality. The articulated form and elevational treatment would add visual interest within the local townscape. As a consequence, the tall building proposal would sit comfortably within the background context of Bankside, preserving the character and appearance of all nearby heritage assets. With its active frontages and new publicly-accessible external spaces, the development would provide a more engaging and animated building at street level, create greater public permeability, and bring valuable greening and biodiversity benefits to this part of the South Bank.
358. With regard to transport considerations, the applicant's Framework Travel Plan has outlined a robust set of measures to encourage sustainable journeys, and the detailed strategy will be secured post-approval. The applicant's Delivery and Servicing Plan sets out a sound strategy for

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minimising net additional vehicle movements to and from the site, a key part of which is to consolidate deliveries with the other two buildings within the WPP campus. Notwithstanding, and as a precautionary measure, a bond will be secured so that highways impacts arising from deliveries and servicing can be monitored over the course of the first two years of operation.

359. Due to neither the ground nor first floor of the building being level with the Southwark Bridge Road footway and highway, the site presents accessibility challenges for pedestrians, wheelchair users and cyclists. In recognition of this, the applicant has agreed to the provision of a platform lift on the stepped pedestrian bridge to access the building, a financial contribution to expand the nearby TfL cycle docking station, and funding towards a feasibility study (with subsequent implementation, if appropriate) for a dedicated cycle turn on Southwark Bridge Road into Sumner Street. Further highways and transport mitigation is to be secured through the Section 106 Agreement.
360. Environmental matters of concern to local residents and businesses, such as construction management, noise, air quality and congestion on the local highway network have all been addressed satisfactorily by the applicant, and compliance will be secured by appropriate conditions.
361. The strong sustainability credentials of the proposal are reflected in its 40% reduction of on-site carbon dioxide emissions over a minimally compliant baseline, its Building Circularity score of 37%, and the predicted BREEAM “excellent” rating.
362. In line with the requirements of the NPPF, the Council has applied the presumption in favour of sustainable development. The proposal would accord with sustainable principles and would make efficient use of a prominent vacant brownfield site to deliver a high quality development that is in accordance with the Council’s aspirations for the area. It is therefore recommended that planning permission is granted, subject to conditions as set out in the attached draft decision notice, referral to the GLA, and the timely completion of a Section 106 Agreement.

**BACKGROUND DOCUMENTS**

<b>Background Papers</b>	<b>Held At</b>	<b>Contact</b>
Site history file: 1519-G  Application file: 21/AP/0599  Southwark Local Development Framework and Development Plan Documents	Planning Division, Chief Executive's Department, 160 Tooley Street, London, SE1 2QH	<ul style="list-style-type: none"> <li>• Planning enquiries telephone: 020 7525 5403</li> <li>• Planning enquiries email: planning.enquiries@southwark. gov.uk</li> <li>• Case officer telephone: 020 7525 5535</li> <li>• Council website: www.southwark.gov.uk</li> </ul>

**APPENDICES**

<b>No.</b>	<b>Title</b>
<b>Appendix 1</b>	Consultation undertaken
<b>Appendix 2</b>	Consultation responses received
<b>Appendix 3</b>	Planning history
<b>Appendix 4</b>	Recommendation

**AUDIT TRAIL**

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth	
<b>Report Author</b>	Patrick Cronin, Senior Planning Officer	
<b>Version</b>	Final	
<b>Dated</b>	24 August 2021	
<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 & Governance	No	No
Strategic Director, Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>		24 August 2021

## Consultation undertaken

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

**Press notice date:** 18/03/2021

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

**Neighbour consultation letters sent:** 15/03/2021

### Internal services consulted

Transport Policy  
 Archaeology  
 Design and Conservation Team  
 Local Economy  
 Urban Forester  
 Environmental Protection  
 Highways Development and Management  
 Flood Risk Management & Urban Drainage  
 Ecology

Environmental Protection  
 Highways Development and Management  
 Transport Policy

### Statutory and non-statutory organisations

Great London Authority  
 Transport for London  
 Thames Water  
 Environment Agency  
 Metropolitan Police Service (Designing O  
 London Fire & Emergency Planning Authorities

### Neighbour and local groups consulted:

First Floor Intel House 24 Southwark  
 Bridge Road

Flat 26 Old Theatre Court 123 Park  
 Street

Davies House 60A Park Street London

Flat 1 Old Theatre Court 123 Park Street

Flat 9 Benbow House 24 New Globe  
 Walk

5 Anchor Terrace 125 Park Street  
 London

Flat 22 20 New Globe Walk London

13 Porter Street London Southwark

Flat 31 Benbow House 24 New Globe  
 Walk

Flat 71 Benbow House 24 New Globe  
 Walk

Flat 50 Benbow House 24 New Globe  
 Walk

Flat 64 Benbow House 24 New Globe  
 Walk

Flat 49 Benbow House 24 New Globe Walk

Flat 41 Benbow House 24 New Globe Walk

Flat 14 Benbow House 24 New Globe Walk

Flat 21 Anchor Terrace 3-13 Southwark Bridge Road

Flat 9 Anchor Terrace 3-13 Southwark Bridge Road

59 Park Street London Southwark

Arches 15 And 16 54 Park Street London

Arch 232 Bank End London

Flat 67 Benbow House 24 New Globe Walk

Cafe 1 Bear Gardens London

Tenth Floor Riverside House 2A Southwark Bridge Road

Unit 4 Riverside House 2A Southwark Bridge Road

Anchor 1 Bankside London

Flat 16 Benbow House 24 New Globe Walk

25 Bear Pit Apartments 14 New Globe Walk London

Empire Warehouse Bear Gardens London

Unit 3 Riverside House 2A Southwark Bridge Road

Flat 9 20 New Globe Walk London

Flat 25 Anchor Terrace 3-13 Southwark Bridge Road

Flat 20 Anchor Terrace 3-13 Southwark Bridge Road

Flat 11 Anchor Terrace 3-13 Southwark Bridge Road

Flat 10 Anchor Terrace 3-13 Southwark Bridge Road

Flat 53 Old Theatre Court 123 Park Street

Flat 18 Old Theatre Court 123 Park Street

Flat 28 20 New Globe Walk London

Flat 1 20 New Globe Walk London

Flat 70 Benbow House 24 New Globe Walk

Flat 63 Benbow House 24 New Globe Walk

Flat 60 Benbow House 24 New Globe Walk

Flat 32 Benbow House 24 New Globe Walk

Flat 29 Benbow House 24 New Globe Walk

Flat 27 Benbow House 24 New Globe Walk

Flat 18 Benbow House 24 New Globe Walk

3 Bear Pit Apartments 14 New Globe Walk London

Flat 32 Old Theatre Court 123 Park Street

Flat 66 Benbow House 24 New Globe Walk

Flat 56 Benbow House 24 New Globe Walk

4 Anchor Terrace 125 Park Street London

17 Bear Pit Apartments 14 New Globe Walk London

12 Bear Pit Apartments 14 New Globe Walk London

Union Works Bear Gardens London

Flat 22 Anchor Terrace 3-13 Southwark  
Bridge Road

Flat 16 Anchor Terrace 3-13 Southwark  
Bridge Road

Flat 51 Old Theatre Court 123 Park  
Street

Flat 38 Old Theatre Court 123 Park  
Street

Flat 31 Old Theatre Court 123 Park  
Street

Flat 21 Old Theatre Court 123 Park  
Street

Flat 16 Old Theatre Court 123 Park  
Street

Flat 9 Old Theatre Court 123 Park Street

Flat 6 Old Theatre Court 123 Park Street

69 Park Street London Southwark

12 Gatehouse Square London  
Southwark

1 Gatehouse Square London Southwark

Flat E 17 Southwark Bridge Road  
London

Flat 16 20 New Globe Walk London

Flat 14 20 New Globe Walk London

Flat 43 Benbow House 24 New Globe  
Walk

Flat 15 Benbow House 24 New Globe  
Walk

23 Bear Pit Apartments 14 New Globe  
Walk London

5 Bear Pit Apartments 14 New Globe  
Walk London

Second Floor 135 Park Street London

Flat 4 20 New Globe Walk London

Flat 19 Benbow House 24 New Globe  
Walk

Flat 74 Benbow House 24 New Globe  
Walk

Flat 7 Anchor Terrace 3-13 Southwark  
Bridge Road

Unit 2 133 Park Street London

Ground Floor Intel House 24 Southwark  
Bridge Road

8 Bear Pit Apartments 14 New Globe  
Walk London

Sixth Floor Intel House 24 Southwark  
Bridge Road

1A Bank End London Southwark

Fifth Floor North Rose Court 2  
Southwark Bridge Road

Units 2 To 3 Benbow House 24 New  
Globe Walk

Flat 37 Benbow House 24 New Globe  
Walk

Flat 8 Old Theatre Court 123 Park Street

1 Bank End London Southwark

Arches 1 To 12 54 Park Street London

Fifth Floor Rose Court 2 Southwark  
Bridge Road

Health And Safety Executive Rose Court  
2 Southwark Bridge Road

The Real Greek Riverside House 2A  
Southwark Bridge Road

60 Park Street London Southwark

The Mezz Riverside House 2A  
Southwark Bridge Road

Flat 33 20 New Globe Walk London

Flat 18 20 New Globe Walk London

Flat 12 20 New Globe Walk London

1 Porter Street London Southwark

3 Perkins Square London Southwark

The Rose Playhouse 56 Park Street  
London

Flat 27 Anchor Terrace 3-13 Southwark  
Bridge Road

Flat 23 Anchor Terrace 3-13 Southwark  
Bridge Road

Flat 13 Anchor Terrace 3-13 Southwark  
Bridge Road

Flat 20 Old Theatre Court 123 Park  
Street

91 Park Street London Southwark

Flat 34 20 New Globe Walk London

Flat 29 20 New Globe Walk London

Flat 19 20 New Globe Walk London

Flat 55 Benbow House 24 New Globe  
Walk

Flat 40 Benbow House 24 New Globe  
Walk

Flat 10 Benbow House 24 New Globe  
Walk

2 Bear Pit Apartments 14 New Globe  
Walk London

Ground Floor 135 Park Street London

Flat 10 Old Theatre Court 123 Park  
Street

Flat 58 Benbow House 24 New Globe  
Walk

Flat 51 Benbow House 24 New Globe  
Walk

Flat 25 Benbow House 24 New Globe  
Walk

53 Park Street London Southwark

15 Gatehouse Square London  
Southwark

19 Bear Pit Apartments 14 New Globe  
Walk London

9 Bear Pit Apartments 14 New Globe  
Walk London

4 Bear Pit Apartments 14 New Globe  
Walk London

Flat 15 Anchor Terrace 3-13 Southwark  
Bridge Road

Flat 50 Old Theatre Court 123 Park  
Street

Flat 7 Old Theatre Court 123 Park Street

99 Park Street London Southwark

83 Park Street London Southwark

51 Park Street London Southwark

17 Porter Street London Southwark

3 Porter Street London Southwark

Flat D 17 Southwark Bridge Road  
London

Flat 23 20 New Globe Walk London

Flat 11 20 New Globe Walk London

Flat 7 20 New Globe Walk London

Flat 5 20 New Globe Walk London

Flat 2 20 New Globe Walk London

Flat 72 Benbow House 24 New Globe  
Walk

Flat 62 Benbow House 24 New Globe  
Walk

Flat 57 Benbow House 24 New Globe  
Walk

Flat 45 Benbow House 24 New Globe  
Walk

Flat 42 Benbow House 24 New Globe  
Walk

Flat 24 Benbow House 24 New Globe  
Walk

13 Bear Pit Apartments 14 New Globe  
Walk London



10 Bear Pit Apartments 14 New Globe Walk London

Sixth Floor Riverside House 2A Southwark Bridge Road

Eighth Floor Riverside House 2A Southwark Bridge Road

Seventh Floor Front Riverside House 2A Southwark Bridge Road

Arch 229 Bank End London

Arch 231 Bank End London

Arch 230 Bank End London

Pret A Manger Riverside House 2A Southwark Bridge Road

The Hub Lexington Catering Riverside House 2A Southwark Bridge Road

Flat 69 Benbow House 24 New Globe Walk

Flat 36 Benbow House 24 New Globe Walk

Flat 12 Anchor Terrace 3-13 Southwark Bridge Road

Arches 13 And 14 54 Park Street London

16 Bear Pit Apartments 14 New Globe Walk London

Ground Floor To Fifth Floor And Eleventh Floor Riverside House 2A Southwark Bridge Road

Pepys House 60B Park Street London

Fifth Floor Intel House 24 Southwark Bridge Road

Ninth Floor Riverside House 2A Southwark Bridge Road

1 Bear Gardens London Southwark

Flat 11 Old Theatre Court 123 Park Street

Flat 15 20 New Globe Walk London

Living Accommodation Anchor 1 Bankside

79 Park Street London Southwark

57 Park Street London Southwark

14 Gatehouse Square London Southwark

2 Gatehouse Square London Southwark

Flat 61 Benbow House 24 New Globe Walk

Flat 33 Benbow House 24 New Globe Walk

Flat 19 Anchor Terrace 3-13 Southwark Bridge Road

Flat 27 20 New Globe Walk London

67 Park Street London Southwark

Flat 3 20 New Globe Walk London

Second Floor Intel House 24 Southwark Bridge Road

225-227 Clink Street London Southwark

Flat 25 Old Theatre Court 123 Park Street

Flat 17 Old Theatre Court 123 Park Street

Flat 13 Old Theatre Court 123 Park Street

Flat 33 Old Theatre Court 123 Park Street

Flat 5 Old Theatre Court 123 Park Street

Flat 2 Old Theatre Court 123 Park Street

Flat 30 Old Theatre Court 123 Park Street

Flat 28 Old Theatre Court 123 Park Street

Flat 22 Old Theatre Court 123 Park Street

22 New Globe Walk London Southwark

Flat 37 Old Theatre Court 123 Park Street	77 Park Street London Southwark
Flat 19 Old Theatre Court 123 Park Street	73 Park Street London Southwark
Basement Intel House 24 Southwark Bridge Road	71 Park Street London Southwark
Fourth Floor Intel House 24 Southwark Bridge Road	9 Porter Street London Southwark
Third Floor Intel House 24 Southwark Bridge Road	1 Perkins Square London Southwark
Flat 6 Anchor Terrace 3-13 Southwark Bridge Road	Flat A 17 Southwark Bridge Road London
Red Lion Court 46-48 Park Street London	Flat 17 20 New Globe Walk London
Sixth To Eighth Floors Excluding Seventh Floor Rear Riverside House 2A Southwark Bridge Road	Flat 52 Benbow House 24 New Globe Walk
Flat 59 Benbow House 24 New Globe Walk	Flat 48 Benbow House 24 New Globe Walk
Flat 17 Benbow House 24 New Globe Walk	Flat 39 Benbow House 24 New Globe Walk
Flat 11 Benbow House 24 New Globe Walk	Flat 22 Benbow House 24 New Globe Walk
Flat 28 Anchor Terrace 3-13 Southwark Bridge Road	Flat 21 Benbow House 24 New Globe Walk
Flat 26 Anchor Terrace 3-13 Southwark Bridge Road	Flat 12 Benbow House 24 New Globe Walk
1 Anchor Terrace 125 Park Street London	24 Bear Pit Apartments 14 New Globe Walk London
89 Park Street London Southwark	15 Bear Pit Apartments 14 New Globe Walk London
22 Bear Pit Apartments 14 New Globe Walk London	87 Park Street London Southwark
Flat 35 Old Theatre Court 123 Park Street	63 Park Street London Southwark
Flat 29 Old Theatre Court 123 Park Street	Flat C 17 Southwark Bridge Road London
Flat 12 Old Theatre Court 123 Park Street	Flat 28 Benbow House 24 New Globe Walk
	Flat 20 Benbow House 24 New Globe Walk
	Flat 14 Anchor Terrace 3-13 Southwark Bridge Road
	97 Park Street London Southwark
	Flat 21 20 New Globe Walk London

15 Porter Street London Southwark	3 Anchor Terrace 125 Park Street London
11 Gatehouse Square London Southwark	Flat 27 Old Theatre Court 123 Park Street
Seventh Floor Rear Riverside House 2A Southwark Bridge Road	Flat 23 Old Theatre Court 123 Park Street
1 Bear Pit Apartments 14 New Globe Walk London	Flat 15 Old Theatre Court 123 Park Street
11 Porter Street London Southwark	Flat 3 Old Theatre Court 123 Park Street
5 Porter Street London Southwark	95 Park Street London Southwark
5 Perkins Square London Southwark	61 Park Street London Southwark
Flat 32 20 New Globe Walk London	55 Park Street London Southwark
Flat 26 20 New Globe Walk London	19 Porter Street London Southwark
Flat 65 Benbow House 24 New Globe Walk	7 Perkins Square London Southwark
Flat 35 Benbow House 24 New Globe Walk	13 Gatehouse Square London Southwark
Flat 7 Benbow House 24 New Globe Walk	Flat 31 20 New Globe Walk London
11 Bear Pit Apartments 14 New Globe Walk London	Flat 25 20 New Globe Walk London
6 Bear Pit Apartments 14 New Globe Walk London	Flat 8 20 New Globe Walk London
Flat 44 Benbow House 24 New Globe Walk	Flat 73 Benbow House 24 New Globe Walk
Flat 30 Benbow House 24 New Globe Walk	Flat 68 Benbow House 24 New Globe Walk
Flat 23 Benbow House 24 New Globe Walk	Flat 54 Benbow House 24 New Globe Walk
Flat 8 Benbow House 24 New Globe Walk	Flat 34 Benbow House 24 New Globe Walk
Flat 17 Anchor Terrace 3-13 Southwark Bridge Road	21 Bear Pit Apartments 14 New Globe Walk London
81 Park Street London Southwark	20 Bear Pit Apartments 14 New Globe Walk London
75 Park Street London Southwark	Flat 29 Anchor Terrace 3-13 Southwark Bridge Road
Flat 6 20 New Globe Walk London	Flat 8 Anchor Terrace 3-13 Southwark Bridge Road
	Flat 20 20 New Globe Walk London

Intel House 24 Southwark Bridge Road  
London

Flat 53 Benbow House 24 New Globe  
Walk

Flat 46 Benbow House 24 New Globe  
Walk

Flat 38 Benbow House 24 New Globe  
Walk

Flat 6 Benbow House 24 New Globe  
Walk

Flat 24 Anchor Terrace 3-13 Southwark  
Bridge Road

Flat 52 Old Theatre Court 123 Park  
Street

Flat 39 Old Theatre Court 123 Park  
Street

Flat 30 20 New Globe Walk London

Flat 24 20 New Globe Walk London

7 Porter Street London Southwark

14 Bear Pit Apartments 14 New Globe  
Walk London

7 Bear Pit Apartments 14 New Globe  
Walk London

34 Park Street London Southwark

Flat 18 Anchor Terrace 3-13 Southwark  
Bridge Road

2 Anchor Terrace 125 Park Street  
London

Flat 36 Old Theatre Court 123 Park  
Street

93 Park Street London Southwark

85 Park Street London Southwark

65 Park Street London Southwark

3 Gatehouse Square London Southwark

Flat B 17 Southwark Bridge Road  
London

Flat 13 20 New Globe Walk London

Flat 10 20 New Globe Walk London

22 Southwark Bridge Road London  
Southwark

Flat 47 Benbow House 24 New Globe  
Walk

Flat 26 Benbow House 24 New Globe  
Walk

Flat 13 Benbow House 24 New Globe  
Walk

Flat 5 Benbow House 24 New Globe  
Walk

18 Bear Pit Apartments 14 New Globe  
Walk London

First Floor 135 Park Street London

**Re-consultation:**

## Consultation responses received

### Internal services

Transport Policy

Archaeology

Design and Conservation Team [Formal]

Local Economy

Urban Forester

Environmental Protection

Highways Development and Management

Flood Risk Management & Urban Drainage

Ecology

Highways Development and Management

### Statutory and non-statutory organisations

Great London Authority

Transport for London

Thames Water

Environment Agency

Metropolitan Police Service (Designing O

### Neighbour and local groups consulted:

23 Park Street London SE1 9EQ

160 Tooley Street London SE1

8 Anchor Terrace 3-13 Southwark Bridge  
Road London

160 Tooley Street London SE1

160 Tooley Street London SE1

52 Old Theatre Court London SE1 9ES

160 Tooley Street London SE1

City of London Corporation PO Box 270  
London

160 Tooley Street London SE1

Gerald Eve 72 Welbeck Street London

160 Tooley Street London SE1

old theatre court 123 park street london

160 Tooley Street London SE1

160 Tooley Street London SE1



**PLANNING HISTORY**

1. The following planning history for the application site, listed in reverse chronological order by decision date, is of relevance:

1a.	<p>Application reference no.: 19/EQ/0138 Application type: Pre-application enquiry</p> <p>Development description: <i>Refurbishment and extension of existing office building (use class B1a), associated public realm improvements and landscaping</i></p> <p>Decision: <b>Pre-application enquiry closed</b> Decision date: 01.02.2021</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• A copy of the Council's formal pre-application response letter has been added to list of documents associated with 21/AP/0599 on the Council's Public Access for Planning Register. The copy of the letter should be referred to for any further information about pre-application enquiry 19/EQ/0138.</li> </ul>
1b.	<p>Application reference no.: 15/AP/0013 Application type: Temporary Planning Permission</p> <p>Development description: <i>Installation of temporary plant/ generator for a period of five years.</i></p> <p>Decision: <b>Granted until 04.03.2020</b> Decision date: 04.03.2015</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• The consented development was a steel structure located in the yard between the 1 Southwark Bridge Road building and Red Lion Court, immediately to the south of stepped access linking the yard to the Thames Path. As consented, the plant/generator structure measured 9.5 metres long, 1.77 metres wide and 3.0 metres in height.</li> <li>• The temporary plant/generator structure has, as of 2021, been removed from the site.</li> </ul>
1c.	<p>Application reference no.: 99/AP/1037 Application type: Advertisement Consent</p> <p>Development description: <i>Display of illuminated fascia sign to Park Street elevation.</i></p> <p>Decision: <b>Granted</b> Decision date: 23.08.1999</p>



<p>Notes:</p> <ul style="list-style-type: none"> <li>This granted consent for the installation of a high-level internally-illuminated 'FT' sign of the same design and positioning as the sign on the south elevation previously consented under 90/AP/0093.</li> </ul>
<p>1d. Application reference no.: 90/AP/0093 Application type: Advertisement Consent</p> <p>Development description: <i>Illuminated sign location on north and south elevation reading 'FT'</i></p> <p>Decision: <b>Granted</b> Decision date: 16.02.1990</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>This is the original grant of consent for the two internally-illuminated high-level 'FT' signs that remain on the north and elevations of the building in the present day.</li> </ul>

2. The following cases of planning history for nearby sites, listed in reverse chronological order by decision date, are relevant:

<p>2a. <u>135 Park Street and 4-8 Emerson Street, London, SE1 9EA</u></p> <p>Application reference no.: 19/AP/0240 Application type: Full Planning Permission</p> <p>Development description: <i>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.</i></p> <p>Status: <b>Granted</b> Decision date: 27.08.2020</p>
<p>2b. <u>Rose Court, 2 Southwark Bridge Road, London, SE1 9HS</u></p> <p>Application reference no.: 18/AP/2302 Application type: Full Planning Permission</p> <p>Development description: <i>Refurbishment and extension of existing office building (Use Class B1) to provide a roof extension at levels 10 and 11, five floor extension to the front</i></p>

*elevation at levels two to six, nine floor extension to the rear elevation at levels two to nine, terraces, new facades and associated works*

Status: **Granted**

Decision date: 28.03.2019

Notes:

- This consented development will form WPP London Campus 02 (LC02). The FT refurbishment will become London Campus 03 (LC03). The two buildings, together with LC01 at Sea Containers Upper Ground, will house approximately 6000 WPP employees.

2c. Riverside House, 2A Southwark Bridge Road, London SE1 9HA

Application reference no.: 18/AP/3210

Application type: Full Planning Permission

Development description:

*Construction of infill extensions at levels 6 to 11 to provide office floorspace (Use Class B1), introduction of roof terraces at levels 8 to 10, enhancements to the existing building facade and treatment of river level and associated works.*

Decision: **Granted**

Decision date: 07.03.2019

2d. 133 Park Street and 105 Sumner Street, London, SE1 9EA and SE1 9HZ

Application reference no.: 16/AP/4569

Application type: Full Planning Permission (FUL)

Development description:

*Demolition of existing buildings and redevelopment to provide two Class B1 office buildings of nine storeys and ten storeys plus plant (41m AOD on Sumner Street and 42.85m AOD on Park Street). The development will include the creation of a new basement; new public realm; provision of a retail (Class A1/A3/A5) kiosk; hard and soft landscaping and other associated works.*

Decision: **Granted**

Decision date: 20.10.2017

Notes:

- A minor material amendment application, 19/AP/5664, was granted subsequent to the approval of 16/AP/4569.
- The development consented under 19/AP/5664 has been implemented and is presently under construction.

2e. Shakespeare Globe Theatre, 21 New Globe Walk

Application reference no.: 16/AP/3009

Application type: Full Planning Permission

	<p>Development description:  <i>Demolition of the existing buildings on the western part of the site and construction of a four-storey building fronting Bankside Thames Path. Construction of a new four storey building with frontage onto Skin Market, and alterations to existing basement level accommodation, providing improved library, archive, theatre facilities, exhibition, rehearsal/education spaces (use class D1) and ancillary accommodation all in connection with the existing Shakespeare's Globe.</i></p> <p>Decision: <b>Granted</b>  Decision date: 28.07.2017</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• This consented development has not been implemented.</li> </ul>
2f.	<p><u>1 Bank End site (including Railway Arches and Thames House bounded by Stoney Street, Clink Street and Park Street), London, SE1</u></p> <p>Application reference no.: 15/AP/3066  Application type: Full Planning Permission</p> <p>Development description:  <i>Redevelopment of 1 Bank End, including reuse of railway arches and rebuilding and extension of the rear of Thames House, Park Street (behind retained facade); remodelling of Wine Wharf building on Stoney Street and development of a two storey building at 16 Park Street, all to provide a development reaching a maximum height of 6 storeys (maximum building height 27.419m AOD) comprising retail units (flexible class A1 shops, A3 cafes/restaurants and A4 drinking establishments use) at ground and first floor levels, a gallery (Class D1 use) at ground floor level, office floorspace (Class B1 use) at ground up to fifth floor level, a cinema (Class D2 use) at ground floor and basement level, associated cycle parking spaces at basement, associated refuse and recycling with new public access routes and public open space.</i></p> <p>Decision: <b>Granted</b>  Decision date: 24.03.2017</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• Two minor material amendment applications have been granted subsequent to the approval of 15/AP/3066. These are 21/AP/0507 and 19/AP/1649.</li> <li>• The development consented under 19/AP/1649 has been implemented and is presently under construction. It is to be known as Bankside Yards.</li> </ul>
2g.	<p><u>185 Park Street, London, SE1 9BL</u></p> <p>Application reference no.: 14/AP/3842  Application type: Full Planning Permission</p>

**Development description:**

*Demolition of existing buildings and redevelopment to provide a mixed use development providing three new buildings comprising basement, lower ground and ground floor plus part 9, 14 and 18 storeys (maximum height 19 storeys) containing 163 residential units (Class C3), Office (Class B1), Retail (Class A1/A3/A4), Cultural facility (Class D1/A1/A3/A4); provision of hard and soft landscaping and the provision of parking, servicing and plant areas.*

Decision: **Granted**

Decision date: 12.02.2016

**Notes:**

- A minor material amendment application, 17/AP/1944, was granted subsequent to the approval of 15/AP/3066.
- The development consented under 17/AP/1944 has been implemented and is presently under construction. It is to be known as Triptych Bankside.

**Sea Containers House, Upper Ground, London, SE1 9PD**

Application reference no.: 11/AP/1955

Application type: Full Planning Permission

**Development description:**

Erection of a new nine storey building in the rear parking/servicing area (maximum height AOD 42.895m) to provide retail at ground and offices above; refurbishment of existing Sea Containers House and change of use of floors 5-14 of the rear wing plus three floors of the main building from offices to a 358 bedroom hotel, including the erection of new roof extension at part 12th floor level to provide a bar ancillary to the hotel use. Extension and conversion of the ground floor area to provide new restaurant (Class A3), cafe (Class A3), service (Class A2) and retail uses (Class A1) together with new service bay, landscaping, new access arrangements and associated car and cycle parking.

Decision: **Granted**

Decision date: 24.11.2011

**Notes:**

- Part of the office floorspace within this consented development, which has now been completed, is occupied by WPP and is known as WPP London Campus 01 (LC01).

## SOUTHWARK COUNCIL

Town and Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended)

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### DRAFT DECISION NOTICE

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**LBS Reg. No.:** 21/AP/0599

**Date of Issue of Decision:**

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Applicant WPP 2005 LTD

### planning permission is GRANTED WITH LEGAL AGREEMENT for the following development:

Refurbishment, recladding and extension of the existing office building to provide office floorspace, a retail unit, public realm and landscaping, and other associated works.

At

1 Southwark Bridge Road London Southwark SE1 9EU

In accordance with the valid application received on 22 February 2021 and supporting documents submitted which can be viewed on our Planning Register.

For the reasons outlined in the case officer's report, which is also available on the Planning Register.

The Planning Register can be viewed at: <https://planning.southwark.gov.uk/online-applications/>

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### Conditions

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#### Permission is subject to the following Approved Plans Condition:

- The development shall be carried out in accordance with the following approved plans:

Reference no.	Plan or document name	Revision or issue	Date	Received on:
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0700_BDG_XX_099_DR_A_03111	Level B1 Proposed GA Plan			12.02.2021
Revision P1	Dated 29.01.2021			

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0700_BDG_XX_100_DR_A_03112 - Level 00 Proposed GA Plan - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_101_DR_A_03113 - Level 01 Proposed GA Plan - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_102_DR_A_03114 - Level 02 Proposed GA Plan - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_103_DR_A_03115 - Level 03 Proposed GA Plan - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_104_DR_A_03116 - Level 04 Proposed GA Plan - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_105_DR_A_03117 - Level 05 Proposed GA Plan - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_106_DR_A_03118 - Level 06 Proposed GA Plan - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_107_DR_A_03119 - Level 07 Proposed GA Plan - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_108_DR_A_03120 - Level 08 Proposed GA Plan - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_109_DR_A_03121 - Level 09 Proposed GA Plan - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_XXX_DR_A_03011 - Proposed Site Plan - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_XXX_DR_A_03021 - Proposed Block Plan - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_XXX_DR_A_03141 - Proposed GA Elevation North - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_XXX_DR_A_03142 - Proposed GA Elevation East - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_XXX_DR_A_03143 - Proposed GA Elevation South - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_XXX_DR_A_03144 - Proposed GA Elevation West - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_XXX_DR_A_03161 - Proposed GA Section A-A -	12.02.2021

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Revision P1 - Dated 29.01.2021

0700_BDG_XX_XXX_DR_A_03162 - Proposed GA Section B-B - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_XXX_DR_A_03163 - Proposed GA Section C - Revision P1 - Dated 29.01.2021	12.02.2021
0700_BDG_XX_XXX_SH_A_21911 - Materials Details - Sheet 01 - Revision P4 - Dated 29.07.21	29.07.2021
0700_BDG_XX_XXX_SH_A_21912 - Materials Details - Sheet 02 - Revision P4 - Dated 29.07.21	29.07.2021
0700_BDG_XX_XXX_DR_A_04801 - UKPN - HV Switchroom - Revision T1 - Dated 15.06.21	13.08.2021
0700-HDR-XX-ZZZ-DR-M-49003 - COMBINED MEP INCOMING UTILITIES - NEW - Revision T3 - Produced by Hurley Palmer Flatt - Dated 02.03.2021	13.08.2021
Planning Statement - Produced by Montagu Evans - Dated February 2021	12.02.2021
(Built) Heritage, Townscape And Visual Impact Assessment - Produced by Montagu Evans - Dated January 2021	12.02.2021
Design And Access Statement (excluding pages 156-174 (Chapter 6 - Façade Design)) - Produced by BDG Architecture and Design with Squire and Partners - Dated 29.01.2021	12.02.2021
WIE16169.100.R.3.2.1.TA - Healthy Streets Transport Assessment - Produced Waterman Infrastructure & Environment Ltd - Dated January 2021	12.02.2021
WIE16169.100.R.4.2.1.TP - Framework Travel Plan - Produced Waterman Infrastructure & Environment Ltd - Dated January 2021	12.02.2021
WIE16169.100.R.5.2.1.DSP - Delivery and Servicing Plan - Produced by Waterman Infrastructure & Environment Ltd - Dated January 2021	12.02.2021
WIE16169.100.R.7.2.1.TN - Technical Note 01 - Response to Transport Consultation Comments - Produced by Waterman Infrastructure & Environment Ltd - Dated 14.07.2021	13.08.2021
Statement Of Community Involvement - Produced by Concilio - Undated	12.02.2021
62201874-MLM-ZZ-XX-RP-YA-0002 - Environmental Noise Impact Assessment - Revision C02 - Dated 25.01.2021	12.02.2021

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Planning Report Air Quality Assessment - Issue No. 2 Produced by Eight Associates - Dated 20.01.2021	12.02.2021
Ecology Report FT Building - Issue No. 4 - Produced by Eight Associates - Dated 29.01.2021	12.02.2021
Landscape and Ecology Management Plan - Issue No. 4 - Produced by Eight Associates - Dated 29.01.2021	12.02.2021
14183 - Daylight and Sunlight - Produced by GIA - Dated 28.01.2021	12.02.2021
WED14569 - Energy Statement - Issue 01 - Produced by Hurley Palmer Flatt - Dated 29.01.2021	12.02.2021
WED14569 - Sustainability statement - Issue 01 - Produced by Hurley Palmer Flatt - Dated 27.01.2021	12.02.2021
LCY14147 - Ventilation & Extraction Strategy - Issue 1 - Produced by HDR - Dated 22.01.2021	12.02.2021
WED14569 - Detailed Circular Economy Statement - Issue 02 - Produced by Hurley Palmer Flatt - Dated 27.01.2021	12.02.2021
Flood Risk Assessment and Drainage Strategy - J3849-C-RP-0001 - Rev 02 - Produced by Webb Yates Engineers Ltd - Dated 01.02.2021	12.02.2021
Arboricultural Implication Assessment - Issue No. 1 - Produced by Eight Associates - Dated 28.01.2021	12.02.2021
Planning Statement Arboricultural Survey and Report - Issue No. 1 - Produced by Eight Associates - Dated 28.01.2021	12.02.2021
Draft Tree Protection Plan - 190721/2 - Revision A - Dated 09.08.2019	12.02.2021
Tree Constraints Plan - 190721/1 - Revision A - Produced by Writtle Forest Consultancy - Dated 02.08.2019	12.02.2021
Ground Investigation Report - STS5193-G01 - Revision 01 - Produced by Soiltechnics - Dated January 2021	12.02.2021
Structural Planning Statement - J3849-S-RP-0007 - Produced by Webb Yates - Dated January 2021	12.02.2021
FT Building Fire Compliance - 66200486-MLM-ZZ-XX-CO-YF-0002-REV01 - Revision 01 - Produced by MLM Group - Dated 28.01.2021	12.02.2021
Construction Environmental Management Plan And Construction Traffic Construction Management Plan - Phase 1 - Revision 04 - Produced	12.02.2021



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by Deconstruct Ltd - Dated 22.01.2021

Construction Environmental Management Plan And Construction Traffic Construction Management Plan - Phase 2 - Revision 01 - Produced by Deconstruct Ltd - Dated 19.01.2021	12.02.2021
The Ft Building, 1 Southwark Bridge Road, London Borough of Southwark - Archaeological Risk Profile - Produced by AOC - Dated July 2019	12.02.2021
The Ft Building, 1 Southwark Bridge Road, London Borough of Southwark - A Written Scheme of Investigation for an Archaeological Watching Brief - Produced by AOC - Dated April 2021	20.04.2021
The Ft Building, 1 Southwark Bridge Road, London, Borough of Southwark - A Written Scheme of Investigation for an Archaeological Excavation (Phase 1) - Produced by AOC - Dated October 2020	12.02.2021
The Ft Building, 1 Southwark Bridge Road, London, Borough of Southwark - A Written Scheme of Investigation for an Archaeological Excavation (Phase 2) - Produced by AOC - Dated April 2021	20.04.2021
The FT Building, 1 Southwark Bridge Road, London Borough of Southwark - Public Engagement Programme - Produced by AOC - Dated July 2021	16.08.2021

Reason:

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

**Permission is subject to the following Time Limit:****2. TIME LIMIT AND QUANTUM OF USES**

Permission is hereby granted for the refurbishment, recladding and extension of the existing office (Class E) building comprising:

- an additional storey at roof level to a maximum AOD height of 37.5m;
- an infill extension to the west elevation at levels 2 to 6;
- an infill extension to the east elevation at levels 3 to 6;
- an extension to the south elevation at levels 3 to 6;

to provide office floorspace (Class E) with first floor retail unit (Class E), roof terraces at level 07, an external plant room at roof level, cycle parking, servicing, refuse and plant areas, new publicly accessible routes through the site, new hard and soft-landscaped public realm improvements and other associated works.

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The development hereby granted 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.

**Permission is subject to the following Pre-Commencements Condition(s)****3. TREE PROTECTION**

Prior to commencement of the development hereby consented (including any demolition, changes to ground levels, pruning or tree removal):

a) An on-site pre-commencement meeting with the LPA shall take place (date, time, location and other details of which are to be agreed with the LPA in writing prior to the meeting).

b) A detailed Arboricultural Method Statement shall be submitted to and approved in writing by the LPA. The detailed Arboricultural Method Statement shall include the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.

c) Cross sections shall be submitted to and approved in writing by the LPA showing surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the approved Arboricultural Method Statement. Following the pre-commencement meeting, all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the LPA. In any case, all works must adhere to 'BS5837: (2012) Trees in relation to demolition, design and construction' and 'BS3998: (2010) Tree work -

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recommendations'.

If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained tree is removed, uprooted is destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the LPA.

**REASON:**

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021; 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.

**4. PLANNING STAGE WHOLE LIFE CYCLE CALCULATION**

Prior to works commencement of any works and no later than RIBA Stage 4, a Planning Stage Whole Life Cycle Calculation shall be submitted to and approved in writing by the Local Planning Authority.

The Planning Stage Whole Life Cycle Calculation shall be conducted in accordance with the nationally prescribed standards, and shall be supported by evidence of prior submission to [ZeroCarbonPlanning@london.gov.uk](mailto:ZeroCarbonPlanning@london.gov.uk) (using the planning submission stage tab of the GLA's WLC assessment template), in line with and fully satisfying the criteria set out in the GLA's Whole Life-Cycle Carbon Assessments guidance.

The development shall not be carried out other than in accordance with the approved Pre-Commencement Whole Life Cycle Calculation.

**REASON:**

To establish a baseline carbon estimate for the project by integrating whole life carbon into the design process (and enabling carbon reduction potential while there is significant capacity to influence development proposals), in the interests of reducing total carbon dioxide emission across the lifetime of the development, as required by: the National Planning Policy Framework 2021; Policy SI 2 (Minimising Greenhouse Gas Emissions); Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved

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Policy 3.3 (Sustainability and Energy Efficiency) of the Southwark Plan 2007.

### 5. FINAL ENABLING WORKS CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Prior to commencement (including demolition), a Final Enabling Works CEMP (covering demolition, below ground works and any works to the existing ground floor slab), shall be submitted to and approved in writing by the LPA. The Final Enabling Works CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to construction site management and to use all best endeavours to minimise off-site impacts, and will include the following information:

- a detailed specification of demolition and construction at each phase of the enabling works including consideration of all environmental impacts and the identified remedial measures;
- site perimeter continuous automated noise, dust and vibration monitoring;
- engineering measures to eliminate or mitigate identified environmental impacts (hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.);
- arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction during the enabling works (signage on hoardings, newsletters, residents liaison meetings, etc.);
- a commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme;
- site traffic (routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.);
- site waste Management (accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations).

Current best practice includes the following:

- Southwark Council's Technical Guide for Demolition & Construction at <http://www.southwark.gov.uk/noise-and-antisocial-behaviour/construction-noise>;
- S61 of Control of Pollution Act 1974;
- The London Mayor's Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition';
- The Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites';
- BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration

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control on construction and open sites';

- BS 7385-2:1993 'Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration';

- BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting';

- Relevant EURO emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended & NRMM London emission standards

<http://nrmm.london/> ;

- The Party Wall Act 1996;

- Relevant CIRIA practice notes; and

- BRE practice notes.

All demolition and construction work shall be undertaken in strict accordance with the approved Final Enabling Works CEMP and other relevant codes of practice, unless otherwise agreed in writing by the LPA.

**REASON:**

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with: the National Planning Policy Framework 2021; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

**6. ENABLING WORKS CONSTRUCTION LOGISTICS PLAN**

Prior to commencement of any works (including demolition), an Enabling Works CLP (covering demolition, below ground works and any works to the existing ground floor slab) developed in liaison with Transport for London to manage all freight vehicle movements to and from the site shall be submitted to and approved by the LPA. The Enabling Works CLP shall identify all efficiency and sustainability measures that will be taken during the enabling works phase of this development, and shall make firm commitments to smart procurement and collaboration (e.g. sharing suppliers) so as to minimise the number of construction vehicle trips.

The development shall not be carried out other than in accordance with the approved Enabling Works CLP or any amendments thereto.

**REASON:**

To ensure that construction works do not have an adverse impact on the

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transport network and to minimise the impact of construction activities on local air quality, in accordance with: the National Planning Policy Framework 2021, and; Policies T1 (Strategic Approach to Transport), T4 (Assessing and Mitigating Transport Impacts), T7 (Deliveries, Servicing and Construction) and SI 1 (Improving Air Quality) of the London Plan 2021.

### 7. FINAL FLOOD RISK ASSESSMENT AND DRAINAGE STRATEGY

Prior to commencement of any works (with the exception of demolition to ground level), a Final Flood Risk Assessment and Drainage Strategy shall be submitted to and approved by the LPA, which shall be based on the principles set out in the Outline Flood Risk Assessment and Drainage Strategy (ref: 'Flood Risk Assessment and Drainage Strategy - J3849-C-RP-0001 - Rev 02 - Produced by Webb Yates Engineers Ltd - Dated 01.02.2021')

The development shall be carried out in accordance with the approved details.

#### REASON:

To ensure the development is designed safely with regard to flood risk and sustainable urban drainage considerations, in accordance with: the National Planning Policy Framework 2021; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011; Saved Policy 3.9 (Water) of the Southwark Plan 2007, and; the Southwark Strategic Flood Risk Assessment 2017.

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

### 8. SWIFT AND RED START NESTING FEATURES

Before any above grade work hereby authorised begins (excluding demolition), details of:

- at least ten Swift bricks; and
- at least two Red Start boxes;

shall be submitted to and approved in writing by the LPA. The details shall include the exact location, specification and design of the ten Swift bricks and two Red Start boxes.

Prior to the first occupation of the building, the ten Swift bricks and two Red Start boxes shall be installed strictly in accordance with the approved

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details. Once completed, all twelve approved habitats shall be maintained as such thereafter.

**REASON:**

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: the National Planning Policy Framework 2021; Policies G1 (Green Infrastructure), G5 (Urban Greening) and G6 (Biodiversity and Access to Nature) of the London Plan 2021; Strategic Policy 11 (Open Spaces and Wildlife) of the Southwark Core Strategy, and; Saved Policy 3.28 (Biodiversity) of the Southwark Plan 2007.

**9. HARD AND SOFT LANDSCAPING**

Before any above grade work hereby authorised begins (excluding demolition), 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 LPA. The landscaping shall not be carried out other 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 2021; 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

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(Biodiversity) of the Southwark Plan 2007.

**10. SECTION DETAIL-DRAWINGS**

Before any above grade work hereby authorised begins (excluding demolition), section detail-drawings at a scale of 1:5 together with 1:50 scale context drawings through all relevant parts of the proposal, to include at least:

- i. Facades (reveals etc.), including:
  - Soffits of the cantilevering storeys;
  - Junctions of exposed structural elements (columns, beams and floors);
  - Head, cills and jambs of openings;
  - Parapets and roof edges;
  - Rooftop balustrades;
- ii. Entrances (including any access sashes, security gates, entrance portals and awnings);
- iii. Cycle store and service bay shutters;
- iv. Typical windows;
- v. Plant screening/ enclosure;
- vi. Shopfront of the retail unit; and
- vii. Signage zones;
- viii. Gates and fencing to all external spaces;

to be constructed in the carrying out of this permission, shall be submitted to and approved in writing by the Local Planning Authority.

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

**REASON:**

In order that the Local Planning Authority may be satisfied that the construction details to be used in the construction of the development achieve a quality of design and detailing, are suitable in context and consistent with the consented scheme, in accordance with: Chapter 12 of the National Planning Policy Framework 2021; 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.



**DRAFT DECISION NOTICE****LBS Registered Number:** 21/AP/0599**Date of issue of this decision:**[www.southwark.gov.uk](http://www.southwark.gov.uk)**11. MATERIALS SCHEDULE AND ON-SITE PRESENTATION OF SAMPLES**

Before any above grade work hereby authorised begins (excluding demolition):

- a) A materials schedule providing the specification of:
- the rooftop plant screen;
  - the elevational fins;
  - the frames of the punched-hole openings;

to be used in the development hereby approved shall be submitted to and approved in writing by the LPA;

b) Sample panels of facing materials and surface finishes for the three items listed in part a) of this condition, each to be at least 1 square metre in surface area, shall be presented on site (or an alternative location agreed with the Local Planning Authority) to and thereafter approved in writing by the Local Planning Authority.

The development shall be carried out in accordance with any such approval given in relation to parts a) and b) above.

The development (with the exception of the rooftop plant screen, the elevational fins and the frames of the punched-hole openings) shall be carried out in accordance with the approved material schedule, which comprises the following documents:

- '0700\_BDG\_XX\_XXX\_SH\_A\_21911 - Materials Details - Sheet 01 - Revision P4 - Dated 29.07.21'
- '0700\_BDG\_XX\_XXX\_SH\_A\_21912 - Materials Details - Sheet 02 - Revision P4 - Dated 29.07.21'

**REASON:**

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials

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to be used, and achieve a quality of design and detailing, are suitable in context and consistent with the consented scheme in accordance with: the National Planning Policy Framework 2021, 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.

### 12. FINAL MAIN WORKS CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Before any above grade work hereby authorised begins (excluding demolition and any works to the existing ground floor slab), a Final Main Works CEMP (covering all works from ground slab upwards to completion of building), shall be submitted to and approved in writing by the LPA. The Final Main Works CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to construction site management and to use all best endeavours to minimise off-site impacts, and will include the following information:

- a detailed specification of demolition and construction at each phase of the main works including consideration of all environmental impacts and the identified remedial measures;
- site perimeter continuous automated noise, dust and vibration monitoring;
- engineering measures to eliminate or mitigate identified environmental impacts (hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.);
- arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction during the enabling works (signage on hoardings, newsletters, residents liaison meetings, etc.);
- a commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme;
- site traffic (routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.);
- site waste Management (accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations).

Current best practice includes the following:

- Southwark Council's Technical Guide for Demolition & Construction at <http://www.southwark.gov.uk/noise-and-antisocial-behaviour/construction-noise>;
- S61 of Control of Pollution Act 1974;
- The London Mayor's Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition';

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- The Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites';
- BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites';
- BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration;
- BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting';
- Relevant EURO emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended & NRMM London emission standards <http://nrmm.london/> ;
- The Party Wall Act 1996;
- Relevant CIRIA practice notes; and
- BRE practice notes.

All demolition and construction work shall be undertaken in strict accordance with the approved Final Main Works CEMP and other relevant codes of practice, unless otherwise agreed in writing by the LPA.

### REASON:

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with: the National Planning Policy Framework 2021; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

### 13. MAIN WORKS CONSTRUCTION LOGISTICS PLAN

Before any above grade work hereby authorised begins (excluding demolition and any works to the existing ground floor slab), a Main Works CLP (covering all works from ground slab upwards to completion of building) developed in liaison with Transport for London to manage all freight vehicle movements to and from the site shall be submitted to and approved by the LPA. The Main Works CLP shall identify all efficiency and sustainability measures that will be taken during the main works phase of this development, and shall make firm commitments to smart procurement and collaboration (e.g. sharing suppliers) so as to minimise the number of construction vehicle trips.

The development shall not be carried out other than in accordance with the

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approved Main Works CLP or any amendments thereto.

**REASON:**

To ensure that construction works do not have an adverse impact on the transport network and to minimise the impact of construction activities on local air quality, in accordance with: the National Planning Policy Framework 2021, and; Policies T1 (Strategic Approach to Transport), T4 (Assessing and Mitigating Transport Impacts), T7 (Deliveries, Servicing and Construction) and SI 1 (Improving Air Quality) of the London Plan 2021.

**Permission is subject to the following Pre-Occupation Condition(s)****14. FINAL DELIVERY AND SERVICING MANAGEMENT PLAN**

Before the first occupation of any part of the development hereby approved, a Final Delivery and Servicing Management Plan (DSP) detailing how all parts of the site are to be serviced shall be submitted to and approved in writing by the Local Planning Authority. The Final DSP shall be based on the principles set out in the Outline Delivery and Servicing Management Plan (Delivery and Servicing Plan - Ref. no. WIE16169.100.R.5.2.1.DSP - Issue 5.2.1 - Waterman Infrastructure and Environment Ltd - Dated January 2021).

Consolidation of deliveries through this development's facilities management and/or off-site consolidation centres plus 'just in time' deliveries, in accordance with Transport for London's guidance, is encouraged.

The development shall not be carried out other than in accordance with the approval given.

**REASON:**

To ensure compliance with: the National Planning Policy Framework 2021; Strategic Policy 2 (Sustainable Transport) of the Core Strategy 2011, and; Saved Policy 5.2 (Transport Impacts) of the Southwark Plan 2007.

**15. TRAVEL PLAN AND TRANSPORT METHODS SURVEY**

a) Before the first occupation of any part of the development hereby approved, a Final Travel Plan shall be submitted to and approved in writing

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by the LPA. The Travel Plan shall set out the measures to be taken to encourage the use of modes of transport other than the car by all users of the building, and shall give particular focus to active travel measures. The Final Travel Plan shall be based on the principles set out in the Framework Travel Plan (ref: Framework Travel Plan - issue 4.2.1 - dated January 2021- produced by Waterman Infrastructure & Environment Limited).

b) At the start of the second year of operation of the approved Final Travel Plan, a detailed Transport Methods Survey showing the methods of transport used by all those users of the development to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the LPA and the development shall not be carried out other in accordance with any such approval given.

**REASON:**

In order that the use of non-car based travel is encouraged in accordance with: the National Planning Policy Framework 2021; Strategic Policy 2 (Sustainable Transport) of the Core Strategy 2011, and; Saved Policies 5.2 (Transport Impacts), 5.3 (Walking and Cycling) and 5.6 (Car Parking) of the Southwark Plan 2007.

### 16. CYCLE STORAGE

Prior to first occupation of any part of the development hereby consented, and notwithstanding the approved drawings, 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.

The submitted details shall show at least:

- 375 long-stay spaces, to include 2 holding and 4 disabled/cargo bicycle spaces;
- 30 short-stay spaces;
- 20% of the provision in the format of Sheffield Stands; and
- lockers, showers and any other end-of-journey facilities.

Thereafter the approved cycle parking facilities provided shall be retained and the space used for no other purpose, and the development shall not be carried out other in accordance with any such approval given.

**REASON:**

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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 2021; Policy T5 (Cycling) of the London Plan 2021; Strategic Policy 2 (Sustainable Transport) of The Core Strategy, and; Saved Policy 5.3 (Walking and Cycling) of the Southwark Plan 2007.

**17. ELECTRICAL VEHICLE CHARGING POINTS**

Before the first occupation of any part of the development hereby approved, details of the installation (including location and type) of two electric vehicle charger points, one for each of the Blue Badge parking spaces within the drop-off area directly to the north of Park Street, shall be submitted to and approved in writing by the Local Planning Authority.

The approved electric vehicle charger points shall be installed prior to occupation of any part of the development.

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

**REASON:**

To encourage more sustainable travel, in accordance with: the National Planning Policy Framework 2021; 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.

**18. URBAN GREENING CERTIFICATION**

a) Prior to first occupation of the development hereby consented, an interim report/letter (together with any supporting evidence) from a suitably qualified landscape specialist shall be submitted to and approved in writing by the LPA. The report/letter shall confirm that sufficient progress has been made in terms of detailed design, procurement and construction to be reasonably well assured that the development hereby approved will, once completed, achieve or exceed the agreed UGF score of 0.12.

b) Within six months of first occupation of the development hereby permitted, a post construction certificate prepared by a suitably qualified

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landscape specialist (or other verification process agreed with the LPA) shall be submitted to and approved in writing by the LPA, confirming that the agreed UGF score of 0.12 has been met.

**REASON:**

To ensure the proposal complies with: the National Planning Policy Framework 2021; Policy G5 (Urban Greening) of the London Plan 2021; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policies 3.3 (Sustainability), 3.4 (Energy Efficiency) and 3.13 (Urban Design) of the Southwark Plan 2007.

### 19. SECURED BY DESIGN

Prior to the first occupation of the units hereby approved, confirmation that Secured by Design certification for that building has been achieved shall be submitted to and approved in writing by the Local Planning Authority.

**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 2021; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.14 (Designing out crime) of the Southwark Plan 2007.

### 20. FINAL EXTERNAL LIGHTING AND SECURITY SURVEILLANCE EQUIPMENT STRATEGY

a) Prior to first occupation of the development hereby consented, a Final External Lighting and Security Surveillance Equipment Strategy shall be submitted to and approved in writing by the LPA. The Strategy shall provide details of:

- all external lighting [including design, power and position of luminaries, and light intensity colours];
- the effect the lighting will have on all external areas including areas beyond the boundary of the development site;
- the dim-down and turn-off times of the lighting within or otherwise illuminating the roof terrace areas; and
- the security surveillance equipment to be installed on the building and within all external areas at all levels of the building.

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b) Prior to first use of the external lighting scheme approved under part a) of this condition, an External Lighting Validation Report shall be submitted to the LPA for approval in writing.

c) The development shall not be carried out other than in accordance with the approved Final External Lighting and Security Surveillance Equipment Strategy.

**REASON:**

In order that the LPA may be satisfied as to the details of the development in the interest of the visual amenity of the area, the safety and security of persons using the area and the amenity and privacy of adjoining occupiers, in accordance with: the National Planning Policy Framework 2021; Strategic Policy 12 (Design and Conservation) and Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity) and 3.14 (Designing Out Crime) of the Southwark Plan 2007.

**21. SCHEME OF SOUND INSULATION (NOISE FROM AMPLIFIED MUSIC)**

a) Prior to first occupation of the development hereby consented, a Scheme of Sound Insulation shall be submitted to and approved in writing by the LPA. The Scheme of Sound Insulation shall ensure that the LFmax sound from amplified and non-amplified music and speech shall not exceed the lowest L90 5min at 1m from the facade of nearby residential premises at all third octave bands between 63Hz and 8kHz. The development shall be constructed in accordance with the approval given and the Scheme of Sound Insulation shall be permanently maintained thereafter.

b) Following completion and prior to first use of the development hereby consented, a Validation Test shall be carried out and the results shall be submitted to and approved in writing by the LPA.

**REASON:**

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities associated with non-residential premises in accordance with: the National Planning Policy Framework 2021; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011; and Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.



**DRAFT DECISION NOTICE****LBS Registered Number:** 21/AP/0599**Date of issue of this decision:**[www.southwark.gov.uk](http://www.southwark.gov.uk)**22. PLANT NOISE VALIDATION TEST**

The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014+A1:2019.

Following the installation of the plant and its mitigating measures, and prior to first use of the development hereby consented, a Validation Test shall be carried out to ensure that the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location, and the results of the Validation Test shall be submitted to the LPA for approval in writing.

Once approved the plant and any acoustic treatments shall be permanently maintained thereafter.

**REASON:**

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with: the National Planning Policy Framework 2021; Strategic Policy 13 (High Environmental Standards) of The Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of The Southwark Plan 2007.

**23. EXTRACTION AND VENTILATION SCHEME FOR COMMERCIAL KITCHEN (CLASS A3) USES**

Prior to the commencement of any restaurant or café (Class E) use, full particulars and details of a scheme for the extraction and ventilation of any commercial kitchen use shall be submitted to and approved by the LPA, demonstrating that that fumes and odours from the kitchen would not affect public health or residential amenity. The scheme shall include:

- Details of extraction rate and efflux velocity of extracted air;
- Full details of grease, particle and odour abatement plant;
- The location and orientation of the extraction ductwork and discharge terminal; and
- A Management and Servicing Plan for maintenance of the extraction system.

Once approved, the scheme shall be implemented in full and permanently maintained thereafter.

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In order to ensure that any installed ventilation, ducting and ancillary equipment will not cause amenity impacts such as odour, fume or noise nuisance and will not detract from the appearance of the building in accordance with: the National Planning Policy Framework 2021; Strategic Policy 13 (High Environmental Standards) of The Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

**Permission is subject to the following Compliance Condition(s)****24. ARCHAEOLOGY PUBLIC ENGAGEMENT PROGRAMME**

The development hereby approved shall be carried out in accordance with the approved Archaeology Public Engagement Programme (The FT Building, 1 Southwark Bridge Road, London Borough Of Southwark - Public Engagement Programme - Produced by AOC - Dated July 2021).

**REASON:**

To promote the unique setting of the application site and provide information on the special archaeological and historical interest of this part of Southwark, in accordance with: the National Planning Policy Framework 2021; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.19 (Archaeology) of the Southwark Plan 2007.

**25. ARCHAEOLOGICAL FOUNDATION AND BASEMENT DESIGN**

The development hereby approved shall be carried out in accordance with the approved scheme of foundation and basement design (Works in Areas of Archaeological Interest J3849 LC3 - Ref. no. J3849-S-RP-0008 - Rev 01 - Status S9 - Produced by Webb Yates - Dated 26.03.2021).

**REASON:**

In order that details of the basement, foundations and all below ground impacts of the proposed development are known and an appropriate protection and mitigation strategy is achieved to preserve archaeological remains by record and/or in situ, in accordance with: the National Planning Policy Framework 2021; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.19 (Archaeology) of the

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**26. ARCHAEOLOGICAL MITIGATION**

The development hereby approved shall be carried out in accordance with the approved Written Schemes of Investigation and the approved Programme of Archaeological Mitigation Works, which comprises the following documents:

- 'The Ft Building, 1 Southwark Bridge Road, London Borough Of Southwark - A Written Scheme of Investigation for an Archaeological Watching Brief - Produced by AOC - Dated April 2021'; and
- 'The Ft Building, 1 Southwark Bridge Road, London, Borough Of Southwark - A Written Scheme of Investigation for an Archaeological Excavation - Produced by AOC - Dated April 2021'

**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: the National Planning Policy Framework 2021; Strategic Policy 12 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.19 (Archaeology) of the Southwark Plan 2007.

**27. ECOLOGICAL MANAGEMENT PLAN COMPLIANCE**

The development hereby consented shall not be carried out other than in accordance with the approved Ecological Management Plan (ref: 'Landscape and Ecology Management Plan - Issue No. 4 - Produced by Eight Associates - Dated 29.01.2021')

**REASON:**

To ensure the protection of wildlife and habitats, and to secure opportunities for the enhancement of the nature conservation value of the site, in accordance with: the National Planning Policy Framework 2021; Policies G1 (Green Infrastructure), G5 (Urban Greening) and G6 (Biodiversity and Access to Nature) of the London Plan 2021; Strategic Policy 11 (Open Spaces and Wildlife) of the Southwark Core Strategy 2011, and; Saved Policy 3.28 (Biodiversity) of the Southwark Plan 2007.

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### 28. FIRE SAFETY STRATEGY COMPLIANCE

The development hereby consented shall not be carried out other than in accordance with the approved fire safety strategy (ref: 'FT Building Fire Compliance - 66200486-MLM-ZZ-XX-CO-YF-0002-REV01 - Rev 01 - Produced by MLM Group - Dated 28.01.2021').

**REASON:**

To minimise the risk to life and minimise building damage in the event of a fire, in accordance with: the National Planning Policy Framework 2021, and; Policy D12 (Fire Safety) of the London Plan 2021.

### 29. SERVICING HOURS

Notwithstanding any details within the application documents hereby approved or any details approved pursuant to conditions attached to this Decision Notice, any deliveries, loading and unloading to the development hereby consented shall take place only between the following hours:

- 10:00hrs to 20:00hrs on Mondays to Fridays;
- 09:00hrs to 18:00hrs on Saturdays;
- 10:00hrs to 16:00hrs on Sundays and Bank Holidays.

**REASON:**

To ensure that the occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, and to reduce vehicle movements on the local road network during peak times, in accordance with: the National Planning Policy Framework 2021; Policy T7 (Deliveries, Servicing and Construction) of the London Plan 2021; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity) and 5.2 (Transport Impacts) of The Southwark Plan 2007.

### 30. HOURS OF USE: ROOFTOP TERRACES

a) The rooftop terrace at Level 07 which is located along the northern edge of the development hereby consented, and as shown on approved drawing '0700\_BDG\_XX\_107\_DR\_A\_03119 - Rev P1 - Level 07 Proposed GA Plan' shall be open for use and carried on only between:

- 07:00hrs to 23:00hrs on Mondays to Friday;
- 08:00hrs to 23:00hrs on Saturdays and Sundays.

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b) The rooftop terrace at Level 07 which wraps around the eastern, southern and western edge of the development hereby consented, and as shown on approved drawing '0700\_BDG\_XX\_107\_DR\_A\_03119 - Rev P1 - Level 07 Proposed GA Plan' shall be open for use and carried on only between:

- 07:00hrs to 22:00hrs on Mondays to Fridays;
- 08:00hrs to 22:00hrs on Saturdays and Sundays.

**REASON:**

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, in accordance with: the National Planning Policy Framework 2021; 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. HOURS OF OPERATION: RETAIL UNIT**

The commercial (Class E) unit at Level 01 which is located along the northern edge of the development hereby consented, and denoted as 'Public Café' on approved drawing '0700\_BDG\_XX\_101\_DR\_A\_03113 - Rev P1 - Level 01 Proposed GA Plan', shall be open for use and carried on only between:

- 07:00hrs to 23:00hrs on Mondays to Saturdays;
- 08:00hrs to 23:00hrs on Sundays.

**REASON:**

To ensure that occupiers of nearby premises do not suffer a loss of amenity by reason of noise nuisance, in accordance with: the National Planning Policy Framework 2021; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

**32. HOURS OF PUBLIC ACCESS: EAST COURTYARD**

The east courtyard of the development hereby approved, and as shown on approved drawing '0700\_BDG\_XX\_100\_DR\_A\_03112 - Rev P1 - Level 00 Proposed GA Plan', shall remain open for use by members of the public between 08:00hrs and 20:00hrs on Mondays to Sundays (including Bank Holidays). Outside of these hours of public access, controlled access into the east courtyard shall be provided to employees of the commercial development hereby approved.

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In the interests of amenity and to retain effective planning control, in accordance with: the National Planning Policy Framework 2021; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

**33. PROVISION AND RETENTION OF REFUSE STORAGE FACILITIES**

Before the first occupation of any part of the development hereby approved, the refuse storage arrangements shown on the approved drawings shall be provided and made available for use by the occupiers.

The refuse storage facilities shall thereafter be retained and the space used for no 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 2021; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policies 3.2 (Protection of Amenity) and Policy 3.7 (Waste Reduction) of The Southwark Plan 2007.

**34. DIGITAL CONNECTIVITY INFRASTRUCTURE STRATEGY**

The development shall be carried out in accordance with the approved digital connectivity infrastructure strategy (COMBINED MEP INCOMING UTILITIES - NEW - Ref: 0700-HDR-XX-ZZZ-DR-M-49003 - Rev T3 - Produced by Hurley Palmer Flatt - Dated 02.03.2021) and shall be maintained as such in perpetuity.

**REASON:**

To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness, in accordance with: the National Planning Policy Framework 2021, and; Policy SI 6 (Digital Connectivity Infrastructure) of the London Plan 2021.

**35. RESTRICTION: NO INSTATEMENT OF ROOF PLANT AND OTHER**

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No roof plant, equipment or other structures, other than as shown on the drawings hereby approved or discharged under an 'approval of details' application pursuant to this Decision Notice, shall be placed on the roof or be permitted to project above the roofline of any part of the building as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosures of any building 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 2021; 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.

**36. RESTRICTION: ROOFS ONLY TO BE USED FOR MAINTENANCE, REPAIR OR MEANS OF ESCAPE**

With the exception of the designated rooftop external amenity spaces and terraces depicted on the approved drawings, all areas of roof within the development hereby consented shall be used only for the purposes of maintenance, repair or means of escape, and shall not be as outdoor amenity space by the occupiers or users of the premises.

**REASON:**

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of overlooking and noise nuisance in accordance with: the National Planning Policy Framework 2021; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

**37. RESTRICTION: NO INSTATEMENT OF APPURTENANCES**

With the exception of rainwater pipes, no meter boxes, flues, vents or pipes other than as shown on the drawings hereby approved or discharged under an 'approval of details' application pursuant to this permission, shall be fixed or installed on the elevations of the building, unless otherwise approved by the LPA.

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To ensure such works do not detract from the appearance of the building in accordance with: The National Planning Policy Framework 2021; 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.

**38. RESTRICTION: NO INSTATEMENT OF TELECOMMUNICATIONS EQUIPMENT**

Notwithstanding the provisions of Parts 24 and 25 The Town & Country Planning [General Permitted Development] Order 1995 [as amended or re-enacted] no external telecommunications equipment or structures shall be placed on the roof or any other part of the building hereby permitted, unless otherwise approved by the LPA.

**REASON:**

In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building, in accordance with: the National Planning Policy Framework 2021; 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.

**Permission is subject to the following Special Condition(s)****39. ARCHAEOLOGICAL REPORTING**

Within one year of the completion of the archaeological work on site, an assessment report detailing the proposals for the off-site analyses and post-excavation works, including publication of the site and preparation for deposition of the archive, shall be submitted to and approved in writing by the Local Planning Authority, and the works detailed in the assessment report shall not be carried out otherwise than in accordance with any such approval given. The assessment report shall provide evidence of the applicant's commitment to finance and resource these works to their completion.

**REASON:**



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In order that the archaeological interest of the site is 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: the National Planning Policy Framework 2021; Strategic Policy 12 (Design and Conservation) of The Core Strategy 2011, and; Saved Policy 3.19 (Archaeology) of the Southwark Plan 2007.

**40. POST COMPLETION CIRCULAR ECONOMY REPORT**

No later than three months following substantial completion of the development hereby consented, a Post Completion Circular Economy Report setting out the predicted and actual performance against all numerical targets in the relevant Planning Stage Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority.

**REASON:**

To ensure that Planning Stage Circular Economy Statement has been implemented in the construction and delivery of the development, and that all on-going operational measures and mechanisms have been satisfactorily implemented, in order to achieve Circular Economy goals and in accordance with: the National Planning Policy Framework 2021, and; Policies GG6 (Increasing Efficiency and Resilience) and SI7 (Reducing Waste and Supporting the Circular Economy) of the London Plan 2021.

**41. POST CONSTRUCTION WHOLE LIFE-CYCLE CARBON ASSESSMENT**

Upon the completion of the as-built design and upon commencement of RIBA Stage 6, but prior to the building being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development shall submit the Post-Construction Whole Life-Cycle Carbon (WLC) Assessment to the GLA.

The WLC shall be submitted to [ZeroCarbonPlanning@london.gov.uk](mailto:ZeroCarbonPlanning@london.gov.uk). The owner should use the post construction tab of the GLA's WLC assessment template and this should be completed accurately and in its entirety, in line with the criteria set out in the GLA's WLC Assessment Guidance.

The Post-Construction Assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based

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on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.

**REASON:**

To ensure whole life-cycle carbon is calculated and reduced, and to demonstrate compliance with: the National Planning Policy Framework 2021; and Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan 2021.

Signed:

*Stephen Platts*

Director of Planning and Growth

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### Informative Notes to Applicant Relating to the Proposed Development

1. INFORMATIVE FROM THAMES WATER: WORKING NEAR OR DIVERTING PIPES

The proposed development is located within 15 metres of Thames Water underground assets and there are mains water crossing within close proximity of the application site. Thames Water does not permit the building over or construction within 5 metres of strategic water mains or within 3 metres of water mains. The development could cause the assets to fail if appropriate measures are not taken.

Please read the Thames Water guide 'Working Near Our Assets' to ensure any works carried out will be in line with the necessary processes if working above or near Thames Water pipes or other structures.  
<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

Should you require further information please contact Thames Water on [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk).

2. INFORMATIVE FROM THAMES WATER: MINIMUM PRESSURE AND FLOW RATE FROM THE WATER NETWORK

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters' pipes. The developer should take account of this minimum pressure in the design of the proposed development.

3. INFORMATIVE FROM THAMES WATER: WASTE INFRASTRUCTURE DESIGN

Foul and surface water must be separated on-site and only joined together prior to the final manhole.

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4. INFORMATIVE FROM THAMES WATER: GROUNDWATER RISK MANAGEMENT PERMIT

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Thames Water would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer.

Permit enquiries should be directed to Thames Water's Risk Management Team, who can be contacted on 020 3577 9483 or at [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk).

5. INFORMATIVE FROM THAMES WATER: TRADE EFFLUENT CONSENT

A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution.

Typical Trade Effluent processes include:

- laundrette/laundry;
- photographic/printing;
- food preparation;
- vehicle washing; and
- treated cooling water and any other process which produces contaminated water.

Pre-treatment, separate metering, sampling access etc. may be required before the Company can give its consent.

Applications should be made at <https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Trade-effluent>.

6. INFORMATIVE FROM ENVIRONMENT AGENCY: ENVIRONMENTAL PERMIT

The Environmental Permitting (England & Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal);
- on or within 8 metres of a flood defence structure or culverted main river

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(16 metres if tidal).

As part of an application for an environmental permit, the applicant will need to submit the following information:

- a detailed method statement for the works;
- demonstrate that the plant, materials, scaffolding or any other temporary measures needed to undertake the works will not have a detrimental impact on the structural stability of the flood defences;
- loading calculations may be required if the activities are considered to be high risk.

Please visit the 'flood risk activities: environmental permits' section of the [gov.uk](http://gov.uk) website for further information. Please contact our National Customer Contact Centre on 03708 506 506 or email [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk), or the local Partnerships & Strategic Overview team on [pso.selondonandnkent@environment-agency.gov.uk](mailto:pso.selondonandnkent@environment-agency.gov.uk) for further details.

### 7. INFORMATIVE FROM LBS TRANSPORT POLICY: CYCLE STORAGE OPTIMISATION

Before applying to discharge the 'CYCLE STORAGE' condition attached to this decision notice, the applicant is encouraged to reconsider the layout of the short- and long-stay storage with the aim of maximising the total number of spaces delivered, so as to achieve a number in excess of the 405 currently proposed.

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### Important Notes Relating to the Council's Decision

#### 1. Conditions

- If permission has been granted you will see that it may be subject to a number of planning conditions. They are an integral part of our decision on your application and are important because they describe how we require you to carry out the approved work or operate the premises. It is YOUR responsibility to comply fully with them. Please pay particular attention to those conditions which have to be met before work commences, such as obtaining approval for the siting and levels of buildings and the protection of trees on the site. If you do not comply with all the conditions in full this may invalidate the permission.
- Further information about how to comply with planning conditions can be found at:  
  
[https://www.planningportal.co.uk/info/200126/applications/60/consent\\_types/12](https://www.planningportal.co.uk/info/200126/applications/60/consent_types/12)
- Please note that there is a right of appeal against a planning condition. Further information can be found at:  
[https://www.planningportal.co.uk/info/200207/appeals/108/types\\_of\\_appeal](https://www.planningportal.co.uk/info/200207/appeals/108/types_of_appeal)

#### 2. Community Infrastructure Levy (CIL) Information

- If your development has been identified as being liable for CIL you need to email [Form 1: CIL Additional Information](#), [Form 2: Assumption of Liability](#) and [Form 6: Commencement Notice](#) to [cil.s106@southwark.gov.uk](mailto:cil.s106@southwark.gov.uk) as soon as possible, so that you can be issued with a Liability Notice. This should be done at least a day before commencement of the approved development.
- **Payment of the CIL charge is mandatory and the CIL Regulations comprises a range of enforcement powers and penalties for failure to following correct procedures to pay, including stop notices, surcharges, late payment interests and prison terms.**
- To identify whether your development is CIL liable, and further details about CIL including eligibility and procedures for any CIL relief claims, please see the Government's CIL guidance:  
  
<https://www.gov.uk/guidance/community-infrastructure-levy>
- All CIL Forms are available to download from Planning Portal:

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[https://www.planningportal.co.uk/info/200136/policy\\_and\\_legislation/70/community\\_infrastructure\\_levy/5](https://www.planningportal.co.uk/info/200136/policy_and_legislation/70/community_infrastructure_levy/5)

- Completed forms and any CIL enquiries should be submitted to [cil.s106@southwark.gov.uk](mailto:cil.s106@southwark.gov.uk)

### 3. National Planning Policy Framework

- In dealing with this application we have implemented the requirements in the National Planning Policy Framework to work with the applicant/agent in a positive, proactive and creative way by offering a pre-application advice service; as appropriate updating applicants/agents of any issues that may arise in the processing of their application and where possible and if applicable suggesting solutions to secure a successful outcome. We have considered the application in light of our statutory policies in our development plan as set out in the officer's report.

### 4. Appeals to the Secretary of State

- If you are aggrieved by the decision of your local planning authority to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.

Appeals can be made online at: <https://www.gov.uk/planning-inspectorate>.

If an enforcement notice is or has been served relating to the same or substantially the same land and development as in your application and if you want to appeal against your local planning authority's decision on your application, then you must do so within: **28 days** of the date of service of the enforcement notice, OR within **6 months** (12 weeks in the case of a householder or minor commercial appeal) of the date of this notice, whichever period expires earlier.

- The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to the Secretary of State that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.
- If you intend to submit an appeal that you would like examined by inquiry then you must notify the Local Planning Authority and Planning Inspectorate

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([inquiryappeals@planninginspectorate.gov.uk](mailto:inquiryappeals@planninginspectorate.gov.uk)) at least 10 days before submitting the appeal.

- Further details are on GOV.UK (<https://www.gov.uk/government/collections/casework-dealt-with-by-inquiries>).

### 5. Purchase Notice

- If either the local planning authority or the Secretary of State grants permission subject to conditions, the owner may claim that the land can neither be put to a reasonably beneficial use in its existing state nor made capable of reasonably beneficial use by the carrying out of any development which has been or would be permitted. In these circumstances the owner may serve a purchase notice on the Council requiring the Council to purchase the owner's interest in the land in accordance with Part VI of the Town and Country Planning Act 1990

### 6. Provisions for the Benefit of the Disabled

- Applicants are reminded that account needs to be taken of the statutory requirements of the Disability Discrimination Act 1995 to provide access and facilities for disabled people where planning permission is granted for any development which provides:
  - i. Buildings or premises to which the public are to be admitted whether on payment or otherwise. [Part III of the Act].
  - ii. Premises in which people are employed to work as covered by the Health and Safety etc At Work Act 1974 and the Management of Health and Safety at Work Regulations as amended 1999. [Part II of the Act].
  - iii. Premises to be used as a university, university college or college, school or hall of a university, or intended as an institution under the terms of the Further and Higher Education Act 1992. [Part IV of the Act].
- Attention is also drawn to British Standard 8300:2001 Disability Access, Access for disabled people to schools buildings – a management and design guide. Building Bulletin 91 (DfEE 99) and Approved Document M (Access to and use of buildings) of the Building Regulations 2000 or any such prescribed replacement.

### 7. Other Approvals Required Prior to the Implementation of this Permission.

- The granting of approval of a reserved matter or outstanding matter does not



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relieve developers of the necessity for complying with any Local Acts, regulations, building by-laws and general statutory provisions in force in the area, or allow them to modify or affect any personal or restrictive covenants, easements, etc., applying to or affecting either the land to which the permission relates or any other land or the rights of any persons or authorities (including the London Borough of Southwark) entitled to the benefits thereof or holding an interest in the property concerned in the development permitted or in any adjoining property. In this connection applicants are advised to consult the council's Highway Maintenance section [tel. 020-7525-2000] about any proposed works to, above or under any road, footway or forecourt.

### 8. Works Affecting the Public Highway

- You are advised to consult the council's Highway Maintenance section [tel. 020-7525-2000] about any proposed works to, above or under any road, footway or forecourt.

### 9. The Dulwich Estate Scheme of Management

- Development of sites within the area covered by the Scheme of Management may also require the permission of the Dulwich Estate. If your property is in the Dulwich area with a post code of SE19, 21, 22, 24 or 26 you are advised to consult the Estates Governors', The Old College, Gallery Road SE21 7AE [tel: 020-8299-1000].

### 10. Building Regulations.

- You are advised to consult Southwark Building Control at the earliest possible moment to ascertain whether your proposal will require consent under the Building Act 1984 [as amended], Building Regulations 2000 [as amended], the London Building Acts or other statutes. A Building Control officer will advise as to the submission of any necessary applications, [tel. call centre number 0845 600 1285].

### 11. The Party Wall Etc. Act 1996.

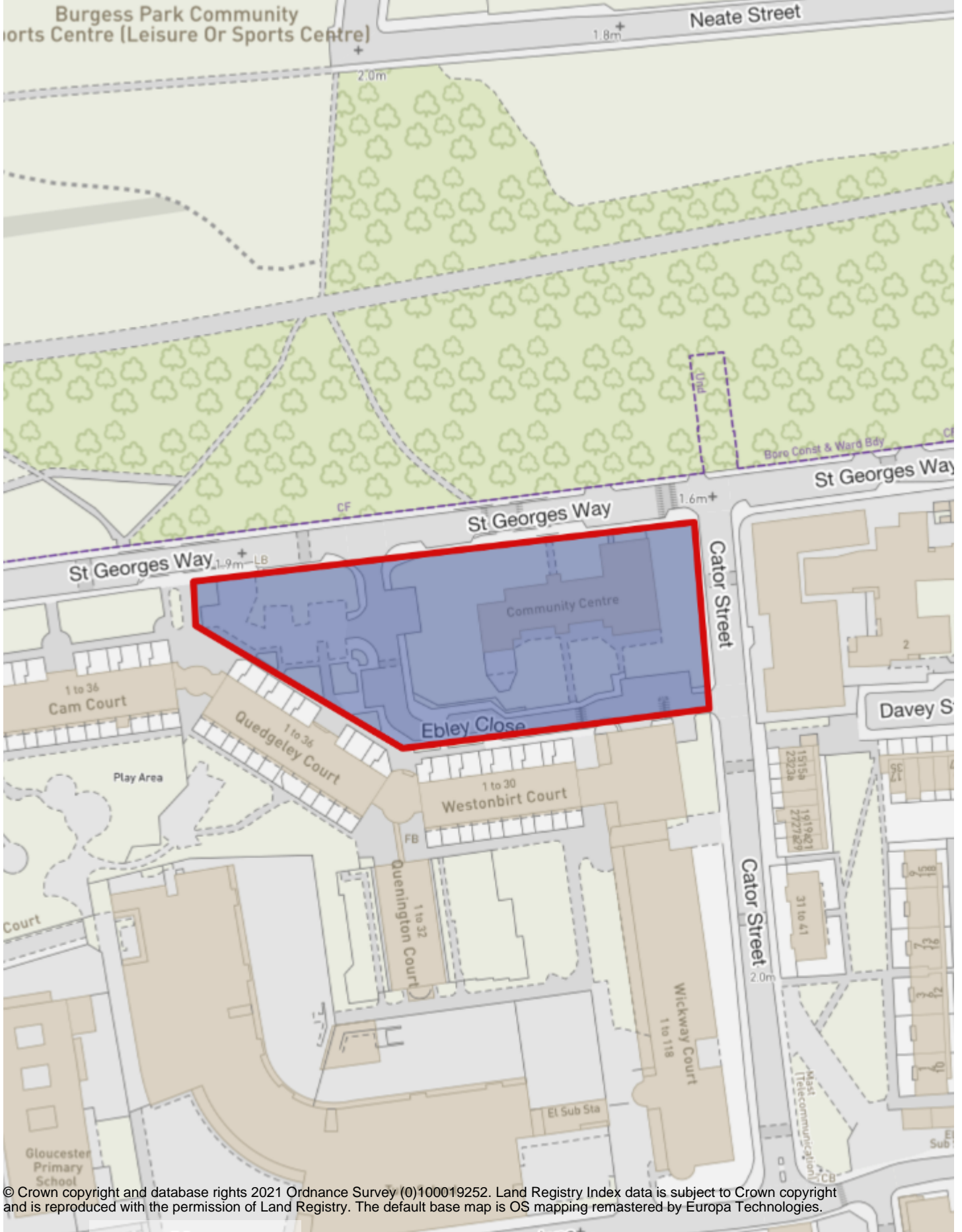
- You are advised that you must notify all affected neighbours of work to an existing wall or floor/ceiling shared with another property, a new building on a boundary with neighbouring property or excavation near a neighbouring building. An explanatory booklet aimed mainly at householders and small businesses can be obtained from the Department for Communities and Local Government [DCLG] Free Literature tel: 0870 1226 236 [quoting product code 02BR00862].

### 12. Important

- This is a PLANNING PERMISSION only and does not operate so as to grant

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any lease, tenancy or right of occupation of or entry to the land to which it refers.



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<b>Item No.</b> 7.3	<b>Classification:</b> Open	<b>Date:</b> 07 September 2021	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 21/AP/0239 for: FULL PLANNING PERMISSION  <b>Address:</b> WICKWAY COMMUNITY CENTRE ST GEORGES WAY LONDON SE15 6PL  <b>Proposal:</b> Redevelopment of the site comprising the demolition of existing building and the erection of two buildings at 9 storeys in height providing 458 sq. metres Community Centre (Class F1a), a 105 sq. metre nursery (F1b) and residential accommodation including 86 units; (24 x 1 bed, 46 x 2 bed and 16 x 3 bed) together with associated communal facilities and highway improvements, landscaping car and cycle parking		
<b>Ward(s) or groups affected:</b>	Peckham		
<b>From:</b>	Director of Planning		
<b>Application Start Date</b>	26/01/2021	<b>Application Expiry Date</b>	27/04/2021
<b>Earliest Decision Date</b>	02/03/2021		

## RECOMMENDATIONS

1. That planning permission be granted subject to conditions and to a unilateral undertaking.
2. That if a unilateral undertaking is not completed by 31 January 2022 the director of planning be authorised to refuse planning permission, if appropriate, for the reason detailed in paragraph 116 of this report.

## BACKGROUND INFORMATION

### Site location and description

3. The application site comprises 0.63 hectares (ha) of previously developed land and is located to the immediate south of Burgess Park. The site is bounded by St Georges Way to the north, Cator Street to the east and Ebley Close and the Gloucester Grove Estate to the south. The site is not located in a conservation area but is adjacent to the Cobourg Road Conservation Area, with the nearest statutory listed building being the New Peckham

Mosque.

The site is located within the Peckham and Nunhead Action Plan with the Core Old Kent Road Action Plan Area to the east and the Aylesbury Action Plan Area to the north east. Burgess Park a Site of Important Nature Conservation and Designated Open Space (Metropolitan Open Land is located across the road to the north.

4. The existing building on the site is set back from St Georges Way and comprises a one and two-storey community centre building and nursery with a pitched tiled roof. The site is currently operating as the Wickway Community Centre and Little Angels Nursery. The site can be accessed via St Georges Way and Ebley Close.

Aerial view of existing site



5. The site is located within:
  - Urban Density Zone
  - Peckham and Nunhead Action Area (PNAA)
  - Air Quality Management Area
6. The post-war architecture of the site varies in scale, height, and massing, with two taller tower blocks giving way to shorter, longer blocks towards the Southern end of the estate. The existing blocks vary in height between 10 and 5 storeys in height. The estate also contains a substantial amount of green space, including play areas, and a number of trees.
7. The site has a Public Transport Accessibility Level of 2.

## The surrounding area

8. The surrounding area is predominantly residential in character with a mixture of housing densities. Opposite to the north of the site is Burgess Park. To the east on the opposite side of the road is the 2 storey building occupied by Southwark Inclusive Learning Service. To the south of the site is immediately to the rear separated by Ebly Close, lies the 6 storey residential Westonbirt Court.

## Details of proposal

9. The proposal is for the demolition of the existing building on the site to facilitate the construction of a pair of residential blocks with replacement community facilities on the ground floors of each block. The blocks would be 9 storeys in height, the existing community centre and nursery would be re-provided.
10. The blocks would contain 86 new residential units (39 units in Block A and 47 units in Block B), the tenure of the units when distributed by habitable rooms would be 51% social rented and 47% private sale. A total of 9 units would be designed to wheelchair standards, these will be split to form 7 social rented and 2 available for private sale. The housing mix of these units would be as follows:

Unit type	Total	Percentage of total
1b2p	17	28%
1b2pWA	7	
2b3pWA	2	53%
2b4p	44	
3p5p	16	19%
<b>All units</b>	<b>86</b>	<b>100%</b>

Table 1- housing mix

11. Block A would contain:
- 74 cycle parking spaces
  - 8 x 1100L communal eurobins
  - 1 x 360L wheelie bin
  - 1 x 170L wheelie bin
  - 5sq metres bulky waste provision
12. Block B would contain:
- 74 cycle parking spaces
  - 8 x 1100L communal eurobins
  - 5sq metres bulky waste provision



13. The ground floor of Block A would provide a new community centre with an area of 542 sq. metres this would comprise an office, an IT hub, a reception lounge space, workshop or training space, storage and toilets.
14. The remainder of the ground floor within Block A would contain the plant for the residential units as well as an entrance lobby leading to the stair and lift access to the flats above as well as the refuse and cycle storage.
15. Block B would be occupied by the replacement children's day nursery on the ground floor, with the remaining space taken with the entrance lobby, plant and cycle and refuse storage.
16. In the immediate area around the car park site, communal amenity space and children's play space for 0-4 year olds would be provided, with further landscaping enhancements to be provided around the Rennie Estate. Three parking spaces for blue badge holders are also proposed.

### **Planning history**

17. See Appendix 1 for any relevant planning history of the application site.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

18. 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;
  - Water resources and flood risk;
  - Archaeology;
  - Wind microclimate;

- Socio-economic impacts;
- Planning obligations (s106 undertaking or agreement);
- Community involvement and engagement;

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

### **Legal context**

20. 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.

21. 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**

#### National Planning Policy Framework 2021

- 22.
- 2. Achieving sustainable development
  - 5. Delivering a sufficient supply of homes
  - 6. Building a strong, competitive economy
  - 8. Promoting healthy and safe communities
  - 9. Promoting sustainable transport
  - 11. Making effective use of land
  - 12. Achieving well-designed places
  - 14. Meeting the challenge of climate change, flooding and coastal change
  - 15. Conserving and enhancing the natural environment
  - 16. Conserving and enhancing the historic environment

#### The London Plan 2021

- 23.
- GG1 Building strong and inclusive communities
  - GG2 Making the best use of land
  - GG3 Creating a healthy city
  - GG4 Delivering the homes Londoners need
  - GG6 Increasing efficiency and resilience
  - D1 London's form, character and capacity for growth
  - 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  
 H2 Small sites  
 H4 Delivering affordable housing  
 H5 Threshold approach to applications  
 H6 Affordable housing tenure  
 H7 Monitoring affordable housing  
 H 10 Housing size mix  
 H11 Build to rent

S4 Play and informal recreation  
 S5 Sports and recreation facilities  
 G1 Green infrastructure  
 G5 Urban greening  
 G7 Trees and woodlands  
 SI 1 Improving air quality  
 SI 2 Minimising greenhouse gas emissions  
 SI 4 Managing heat risk  
 SI 7 Waste capacity and supporting the circular economy  
 T2 Healthy streets  
 T4 Assessing and mitigating transport impacts  
 T5 Cycling  
 T6 Car parking  
 T6 1 Residential parking  
 T7 Deliveries, servicing and construction

#### Core Strategy Strategy 2011

24. Strategic Policy 1 – Sustainable development  
 Strategic Policy 2 – Sustainable transport  
 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 11 – Open spaces and wildlife  
 Strategic Policy 12 – Design and conservation  
 Strategic Policy 13 – High environmental standards

#### The Southwark Plan 2007 – Saved Policies

25. 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 Management  
 Policy 3.11 - Efficient Use Of Land

Policy 3.12 – Quality In Design  
 Policy 3.13 – Urban Design  
 Policy 3.14 – Designing Out Crime  
 Policy 3.18 - Setting Of Listed Buildings, Conservation Areas And World Heritage Sites  
 Policy 3.19 – Archaeology  
 Policy 3. 20 – Tall Buildings  
 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 5.1 - Locating Developments  
 Policy 5.2 - Transport Impacts  
 Policy 5.3 – Walking And Cycling  
 Policy 5.7 – Parking Standards For Disabled People And The Mobility Impaired

#### Nunhead Action Area Plan

26. Policy 7 Community Facilities  
 Policy 11 Active Travel  
 Policy 15 Residential Parking  
 Policy 16 New Homes  
 Policy 17 Affordable and Private Homes  
 Policy 18 Mix and Design of New Homes  
 Policy 19 Public space and sites of importance for nature conservation (SINCS)  
 Policy 20 Trees  
 Policy 21 Energy  
 Policy 22 Waste, water, flooding and pollution  
 Policy 23 Public realm  
 Policy 25 Built form  
 Policy 26 Building heights

#### Supplementary Planning Documents and Guidance

27. 2015 Technical Update to the Residential Design Standards (2011)  
 Section 106 Planning Obligations and Community Infrastructure Levy (CIL)  
 SPD 2015  
 Mayor of London Housing SPG 2016

### **Emerging planning policy**

#### New Southwark Plan

28. The New Southwark Plan (NSP) was submitted to the Secretary of State in January 2020. The Examination in Public (EiP) for the NSP took place between February to April 2021 when the amendments within the Proposed

Changes to the Submitted New Southwark Plan were considered along with the consultation responses received at each stage of public consultation. The proposed main modifications to the draft plan arising from the EIP (and as agreed with the EIP planning inspectors) will be consulted on in September/October. It is anticipated that the plan will be adopted later in 2021 following the EIP main modifications consultation and the new plan will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy.

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.

#### Strategic Policies

SP 1 Quality affordable homes

SP 2 Social regeneration to revitalise neighbourhoods

SP 6 Cleaner, greener, safer

#### DM Policies

SP 1 Quality affordable homes

SP2 Regeneration that works for all

SP5 Healthy, active lives

SP6 Cleaner, greener, safer

P1 Social rented and intermediate housing

P2 New family homes

P7 Wheelchair accessible and adaptable housing

P12 Design of places

P13 Design quality

P14 Residential design

P15 Designing out crime

P17 Efficient use of land

P44 Healthy developments

P46 Community uses

P48 Public transport

P49 Highway impacts

P50 Walking

P52 Cycling

P53 Car Parking

P54 Parking standards for disable people and mobility impaired people

P55 Protection of amenity

P59 Biodiversity

P60 Trees

P64 Improving air quality

P65 Reducing noise pollution and enhancing soundscapes

P66 Reducing water use

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

29. Six comments have been received in relation to this application from members of the public, Five objections from local residents and one from the Friends of Burgess Park as summarised below:

Comments from residents:

- The new units will block light to the existing flats and further marginalise the existing community.
- The proposal would increase parking stress on the surrounding streets
- The development would remove land used by school children at Angel Oak School removing space for them to exercise, play and learn.
- The works will bring noise, dust and misery to existing residents.
- Height of the proposed buildings detrimental to existing residents in terms of daylight and sunlight
- Significant shadow cast upon Burgess Park, height of the proposed blocks should be reduced
- Would like landscaping to be improved to provide green corridors.

30. Objection from the Friends of Burgess Park

#### Trees

The proposal would result in the loss a Category A tree, 11 Category B trees and 10 Category C trees, with a loss of 1074 sq metres of tree canopy, which will not be replaced by new trees – not all of which will be on the development site unit 2050.

#### Harm to the Site of Importance for Nature Conservation (SINC)

Friends of Burgess Park consider that the 9 storey bocks along with other buildings in planning south of Burgess Park will harm it as a site of Importance for Nature Conservation. The London Plan also points out that developments should establish a good relationship with the character of the surrounding area.

The park should respond to the park edge and existing trees/biodiversity. The design does not satisfy any of the above criteria.

#### Nursery

The nursery garden is small and adjoins roads and will be overshadowed by the tall buildings next to it, currently the nursery space is open and sunny.

The entrance to the nursery is located close to parked vehicles which seems unsafe.

#### Community Centre

The new facility appears to lose circulation space, useful for mingling and for providing a safety zone outside the nursery before children left the building. The size of the hall is reduced in the plan so that the hall will no longer be able to cater for a number of sports.

#### Green / Brown roofs

The green / brown roofs may not provide the biodiverse benefits suggested.

#### Design

Fails to complement the existing estate and will mask the award winning glass entrance atriums.

31. The application has been referred to the GLA, who have indicated that they are unlikely to raise objections, however the stage 1 report has not yet been issued.
32. These matters are considered in the main body of the report below.

## **ASSESSMENT**

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

33. The site is currently used as a community centre and nursery within use class E. The proposal would retain the existing uses with a reduction in the total floorspace of 88sq.m. from 651sq.m. to 563sq.m. Saved policy 2.1 (enhancement of community facilities) does not allow for the loss of the use of a community facility unless the facility is surplus to requirements or there is another locally accessible facility with similar or enhanced provision. Draft policy P46 (community uses) of the New Southwark Plan says that development must retain community facilities. The policies do not protect the amount of floorspace but the use; the use here would be protected with a more efficient and modern facility and continue to be used by the Wickway Community Centre Association. The proposal complies with the protection of community uses in the Development Plan. Housing is proposed on floors above and complies with land use policies for the site. The principle of the development in terms of land use complies with the Development Plan.

### **Tenure mix and affordable housing.**

34. The proposal would provide 86 new units, 51% of the habitable rooms equating to 39 units would be affordable for social rent. The remainder would be for private sale. The provision of new council homes represents a significant contribution towards the council's affordable housing targets, and towards meeting the needs of the boroughs residents. As such, this aspect of the scheme is welcomed and acceptable.

### **Dwelling mix including wheelchair housing**

35. As per the table 1 under Details of Proposal, the housing mix would be 28% 1b2p units, 58% 2 bedroom units and 19% 3 bedroom units. The mix is not strictly in compliance with current policy, (Strategic Policy 7 [Family Homes] of the Core Strategy 2011) requires 20% of the units to be 3 + bedrooms. However when considering the unit size split in the affordable offer this comprises 13% 1 beds, 46% 2 beds and 41% 3 beds. A local housing needs survey was conducted by the TMO in April 2020 which found that there was

a higher demand for 3 bed units.

It is considered that given the overall benefits of the scheme and the relatively higher proportion of 3 beds homes in the social rented offer, that the minor shortfall in 3+ units

36. Nine units would be wheelchair accessible, comprised of 27 habitable rooms. This would equate to 10% based on unit numbers in accordance with the policy requirements of the Saved Southwark Plan.
37. In summary, the proposal would provide a compliant tenure mix in terms of the numbers of 1 and 2 bed homes. There would be a small shortfall in 3+ bedrooms, (1%) in respect of the Saved Southwark However 3 bed provision in the social rented offer would be entirely policy compliant. Given the significant overall benefits of the scheme the minor shortfall in 3 bed units is considered acceptable.

### **Density**

38. The proposed blocks would be comprised of a total of 306 habitable rooms. This would in turn equate to 485 habitable rooms per hectare on site.
39. This figure is within the range of 200-700 habitable rooms per hectare limit within the urban zone under Strategic Policy 5 [Providing New Homes] of the Core Strategy.

### **Quality of residential accommodation**

40. The proposed dwellings would be spacious all meeting or exceeding, (with the exception of some of the one bedroom units within the private block) exceeding the space standards of the Residential Design Standards SPD. These dwellings would largely be dual or triple aspect, offering excellent access to natural light, and cross ventilation. All of the 3 bed units would benefit from a minimum of 10sqm of private outdoor amenity space in the form of balconies, or gardens. Within the social rented block the smallest size of balcony would be 9 sq. metres. The private block would have some balconies to the 1 bedroom units that would be 6 sq. metres, the 2 bed room units within this block would be a minimum of 9 sq. metres. The shortfall in the amenity space would be included within the communal amenity space. Therefore, the proposed quality of accommodation would be of a high standard.



Example 3 bed unit



Example 1 bed unit



41. In summary, the proposed quality of accommodation would be excellent, and is a positive aspect of the scheme.

### **Design, layout, open space and heritage assets**

42. The proposed scheme consists of twin nine storey 'mansion' blocks with a public space and route through to Burgess Park between them. The juxtaposition of two blocks standing forward of the more linear 6 storey existing estate buildings will produce a successful and attractive composition. In particular the strong gap between the proposed buildings with community uses on the ground floors of the buildings opening out onto it will allow for views and routes through to the Park and will enable the space to act as a public foyer. The form of the blocks is such that they will form suitably elegant frontage to the park, not dissimilar in concept to juxtaposition of mansion blocks with parks elsewhere in London. The orientation and placing of the blocks in respect of Burgess Park ensures that the openness of the MOL is maintained, any overshadowing is limited and transitory and that the MOL is not harmed. Given their scale and location the buildings would not harm the character appearance of the adjacent Coburg Road conservation area. The New Peckham Mosque is on the north side of the park and the setting and special architectural and historic character of the building would not be affected by the proposals. The impact on the setting of the listed St Georges Church to the west would be limited given that the new buildings would be seen in the context of the existing 6 storey linear estate blocks.
43. At a maximum of 37.6m high, the proposed new blocks would be defined as a tall building under the Council's policies. The NPPF requires good design as a key aspect of sustainable development. Paragraph 130 states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
44. In terms of the locational requirements for tall buildings the site is not situated within a highly accessible location, an Opportunity Area or a town centre. it is still necessary to test the current application against the requirements of saved policy 3.20 of the Southwark Plan, which requires that all tall buildings should:
- i. Make a positive contribution to the landscape; and
  - ii. Be located at a point of landmark significance; and
  - iii. Be of the highest architectural standards; and
  - iv. Relate well to its surroundings, particularly at street level

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

45. The New Southwark Plan Policy P16 Tall Buildings identifies specific

locations for tall buildings, again within town centres opportunity areas, action area cores and CAZ. In this regard the site is not within any of these specific locations, however the proposed two 9 storey buildings are not out of kilter with the existing buildings which in the immediate context are 6-8 storeys. The buildings would not cause harm upon any strategic views and are considered to respond positively with the local townscape as well as providing publically accessible space and communal facilities for residents and the wider community.

#### Architectural expression

46. The facades of the scheme will feature hexagonal bays to flats as a key component of the architectural expression of the scheme. This is derived partly from the cranked footprint of estate blocks behind and partly from the form of existing 'mansion' blocks of similar bulk. There were subtle differences between the arrangement of bays on each block to reflect different flat layouts and mixes. The materials would be predominantly brick with exposed concrete soffits and balcony edges, again as a modern day interpretation of the mansion block architecture.
47. Like many traditional buildings, including mansion blocks, the facades of the two buildings divided into a base, a middle and a top. The base features colonnades to the central space which will give additional status as an active public space. The east facing block will have an equally strong base of a canopy that shelters open space to the eastwards facing community hall and the nursery in this location.
48. Overall, the architectural expression of the buildings is a successful re-interpretation of traditional Edwardian mansion block aesthetic.

#### Layout of residential floors

49. The bay windows will provide really interesting and delightful layouts to each flat. The flexibility of the plan forms in allowing circuits through rooms and spaces was also noted and supported. The Design Review Panel did however note that the subdivision of kitchens and hallways reduced the feeling of space within each flat. The units have a mix of both open plan and separate kitchens within both tenures. Officers consider that it was important to deliver some flats with separate kitchen spaces. Each block will have a generous double height entrance hall and generous stairwell going up through each building. This will introduce a sense of luxury to the internal communal spaces of each building.
50. In addition, the position of the stairwell also gave opportunities for an interesting architectural expression on the facades of the building. However, at the DRP a discussion of the stairwell led to speculation about its use and about the juxtaposition of family units with other smaller non-family units. It was suggested that family units should be clustered lower down the buildings. This would also mean that families would not disturb other building users to the same extent and that there would be easier access for families via lifts or

the stairwells to the communal space between the buildings and to Burgess Park. This has not been incorporated within the final design, as the units are stacked over all floors, however the mixing the units is not considered a significant issue.

Proposed CGI view from St George's Way



Nursery and Community Centre

51. The nursery would be located at the base of the eastern block, set back towards the existing estate. It is near the existing estate buildings from where many people will come, and a projecting canopy will give its entrance a strong and obvious presence. In addition, its location allows for the creation of a private nursery garden/ outdoor space immediately to the east. It will be a pleasant space to use. It has been demonstrated in the daylight and sunlight report that the garden will receive sunlight in accordance with the BRE guidelines.
52. The community centre is spread across the base of both blocks, with a hall, kitchen and toilets at the base of the west block, and workshop/ meeting room, toilets, IT hub, office and reception/café at the base of the west block. Both will open out on the central public space and both will have access (and could do much to bring this space alive) and both will have access to their own private gardens. Although the splitting of community functions across both blocks may seem a little odd, there is a logic to having a hall that is separated from what is likely to be a more intensely used suite of rooms. Spreading the function across both buildings has also allowed for a greater overall area of community space.
53. The design of both the community space and the nursery have been carried out in conjunction with both end user groups taking into account current and

potential future requirements.

### **Landscaping, trees and urban greening factor**

54. The submission included an arboricultural assessment, which has been reviewed by the council's Urban Forester. The proposal would see the loss of 22 trees on site. The proposal would remove 1 category A tree, 11 category B trees and 10 category C trees. Some replanting would be undertaken on the wider site as part of the wider landscaping plan. The loss of trees would be required as they are located on the developable land.
55. The arboricultural impacts assessment confirms that a total of 1913 cm stem girth would be removed with 300cm proposed for replacement via seven new trees, giving a net loss of 1613cm.

This equates to £55,200 in stem girth to be provided off-site. That figure is based on Southwark's term contractor unit cost for 14-16cm girth sized trees.

#### Landscaping

56. The landscaping within the site would be extended across the site to include the public realm areas between the two blocks, the nursery garden located between St George's Way and Cator Street, the community centre garden to the north.
57. The communal garden would be located on the corner, with St George's Way to the front and Ebley Close to the side and rear. Despite the overall loss of trees on the site to enable the construction of the new housing the new landscape design, will deliver new wildflower planting, green roof and sustainable urban drainage, achieving an urban greening factor of 0.4 as recommended by the London Plan. As set out in paragraph 100 the landscaping, which has been reviewed by our ecology officer will enhance bio diversity on the site.

### **Outdoor amenity space, children's play space and public open space**

58. Based on the population yield calculator provided by the GLA, the proposal would have an estimated child population of 59.5, with the following breakdown:

0-4 year olds: 25.1  
 5-11 year olds: 19.7  
 12-15 year olds: 9.6  
 16-17 year olds: 5.1

59. The total play space required at 10sq metres per child is 595 sq. metres. The

proposal would provide a dedicated area of 618 sq. metres, which includes 90 sq. metres within the public realm of within the courtyards and spaces to the south of the new buildings. This would meet the 10sqm per child playspace requirements as set out in the S106 and CIL SPD.

60. It is proposed to provide a new community garden for use by all residents to the north of the site at the junction of St Georges Way and Ebley Close. This new garden provides approximately 280 sq metres of communal open space. The required amount of communal space is 50 sq metres for each block plus 18.3 sq metres to address the shortfall of private amenity space for the West Block and a shortfall of 72 sq metres in respect of the East Block totalling 190.3 sq. metres. Therefore the space allocated would be in excess of what would be required under the residential design standards.
61. In summary, the scheme would offer an excellent provision of communal amenity space and playspace for new and existing residents of all ages.

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

#### **Daylight/sunlight**

62. 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 (VSC) can be reduced by about 20% of the original value before the loss is noticeable.
63. This is supplemented by the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight may be affected.
64. In considering the impact upon sunlight, the test is based upon a calculation of annual probable sunlight hours (APSH) for all window faces within 90 degree of due south. The BRE guidelines state that a window should receive a minimum of 25% of the annual probable sunlight hours, of which, 5% should be received in winter months. Where window sunlight levels fall below this recommendation, the window should not lose more than a 20% of its former value and the reduction in sunlight over the whole year should not be greater than 4% of the ASPH.

65. The Mayor of London's 'Housing SPG' (March 2016) advises that the BRE guidelines should be applied with an appropriate degree of flexibility and sensitivity to higher density development, especially in opportunity areas, town centres, large sites and accessible locations. It suggests that account should be taken of local circumstances, the need to optimise development and scope for the character and form of an area to change over time.
66. The applicant has submitted a daylight/sunlight assessment as part of this application, which has assessed the impact of the proposed blocks on surrounding properties in terms of daylight/sunlight access. Findings vary depending on the properties assessed and are set out below.
67. The following properties have been assessed and were found to remain compliant in terms of daylight and sunlight, as these properties would still retain target values as set out in the BRE Guidelines for daylight in terms of Vertical Sky component (VSC) and daylight distribution and sunlight, Annual Probable Sunlight Hours (APSH).

17 -29 Cator Street (odd)  
 20-30a Sumner Road (even)  
 17-35 Davey Street (odd)

Vertical Sky Component  
 Table 1 VSC calculations

Buildings Assessed	Windows Tested	Non-BRE Compliant (VSC)	Compliant
1 – 36 Quedgeley Court	90	4	86
1 – 30 Westonbirt Court	150	61	89
1 – 118 Wickway Court	20	1	19
15 – 23 Cator Street	8	0	8
15A -23A Cator Street	8	0	8
17 – 29 Cator Street	40	0	40
20 – 30A Sumner Road	48	0	48
SILS School Davey Street	27	20	7
17 – 35 Davey Street	20	0	20
<b>Total</b>	<b>411</b>	<b>86</b>	<b>325</b>

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Table 2 No Sky Line Calculations

Buildings Assessed	Rooms Tested	Non-BRE Compliant (NSL)	Compliant
1 – 36 Quedgeley Court	54	4	50
1 – 30 Westonbirt Court	90	1	89
1 – 118 Wickway Court	12	0	12
15 – 23 Cator Street	4	0	4
15A -23A Cator Street	4	1	3
17 – 29 Cator Street	20	0	20
20 – 30A Sumner Road	24	0	24
SILS School Davey Street	21	0	21
17 – 35 Davey Street	20	0	20
<b>Total</b>	249	6	243

68. In terms of daylight and sunlight, these properties would the target values as set out in the BRE Guidelines for daylight in terms of Vertical Sky component (VSC) and daylight distribution and sunlight, Annual Probable Sunlight Hours (APSH).

17 -29 Cator Street (odd)  
 20-30a Sumner Road (even)  
 17-35 Davey Street (odd).

69. Quedeley Court

The assessment shows that 86 of the 90 windows analysed met the BRE target VSC value with the proposal in place. Additionally 50 of the 54 rooms meet the BRE target value for daylight distribution. The windows face 90 degrees of due north and so do not need to be considered for sunlight as per the BRE guidelines.

70. Notwithstanding the shortfalls experienced which are to ground floor rooms and possibly a circulation space the reductions would still equate to no more than 30% from their existing level. As such the retained levels of daylight and sunlight would still be good within an urban area.



71. In terms of daylight distribution 3 of the 4 rooms experience reductions beyond 20%, with the fourth room serves a first floor bedroom, which is seen as less important with regard to daylight distribution. The rooms affected all experience reductions of less than 30%, which are considered acceptable in the location.
72. In summary, while there would be a modest impact on some habitable rooms within Quedeley Court, this would be to an acceptable level on balance.

73. Westonbirt Court

In daylight terms 89 out of 150 windows analysed met the target value for VSC with the proposal in place and 89 out of 90 rooms met the target value for daylight distribution. As all of the windows analysed are 90 degrees due north they do not need to be considered for sunlight.

74. There are reductions beyond 20% to 61 windows in Westonbirt Court, however all windows retain at least 19% VSC, the majority of windows within this block would retain VSC levels in excess of 27%. In respect of daylight levels within rooms all but one room experiences less than 20% reduction in daylight distribution, (24%).
75. Overall the level of daylight experienced to rooms and windows within Westonbirt Court would not be harmful and a reasonable level of light will be retained to the building.

76. Wickway Court

In daylight terms 19 out of the 20 windows tested would comply with the BRE Guidelines. The window that is close to but does not meet the target is within a room served by another window, so when testing the daylight within the room there is no change. Overall, there is not considered to be a significant impact to these properties.

77. 15 – 23A Cator Street

In daylight terms all of the windows tested would comply with the BRE guidelines for VSC. Within the rooms 3 of the 4 rooms met the BRE target, with one room experiencing a 21% reduction this represents a minor reduction and as such there is not considered to be any significant impact to these units.

78. SILS School Davey Street

Though not a residential property, the use of the school as an educational establishment would necessitate reasonable access to natural light for staff and pupils. As such, the school has also been assessed as part of the wider daylight/sunlight assessment.

79. In terms of daylight 7 out of the 27 windows met the VSC target, however all of the rooms met the BRE guidance for daylight distribution within the rooms. In relation to sunlight 21 of the 25 windows analysed for sunlight met the BRE target for annual sunlight, with all of the windows meeting the target for winter sunlight. Given the close proximity of the development to the school site it is likely that any significant development would impact the school. However the retained levels of daylight and sunlight are considered to be acceptable and considered to be good in an urban context. Thus, the impact to the school would be to an acceptable degree.

### **Daylight and Sunlight within the proposed development**

80. The Average Daylight Factor (ADF) is a more detailed assessment and considers the amount of sky visibility on the vertical face of a window, but also the window size, room size and room use. The recommendations for ADF in dwellings are 2% for kitchens, 1.5% for living rooms and 1% for bedrooms. The BRE recommends that whilst ADF is an appropriate measure for new buildings.
81. In terms of daylight within the proposed development all 256 rooms analysed met the ADF target value set out in the BRE Guidance.
82. The scheme would generally provide dwellings with good access to daylight and the majority of dwellings also enjoying good levels of sunlight.

### **Overshadowing**

83. Shadow path testing conducted as part of the daylight/sunlight assessment has determined that in relation to Burgess Park there is only minimal additional shadow cast onto the parkland between March and September. Where shadow does occur during these months, it is broadly confined to small areas and passes quickly across the space. In December, when less outdoor activities occur, there is some additional shadow from the proposal across the parkland between 10am and 2pm, although this passes relatively quickly across the main section of park.
84. In relation to the newly created amenity areas the tests undertaken demonstrate that these areas will retain at least 2 hours of sunlight on 21<sup>st</sup> March to at least 50% of its area. As such, the proposal would not present a risk in terms of overshadowing to nearby amenity spaces.

### **Privacy**

85. The two blocks would be slightly set back from Ebley Close with the flank elevation of Wickway Court closest to Block A. It is noted that the only glazing to this elevation is to the curved lightwell serving the access core. There are therefore no issues associated with privacy in this regard. Block B would be located in front of Westonbirt Court and would be approximately between 18 to 19 metres from the building line of this block. In terms of privacy Southwark Residential Design Guidance suggests that where units are separated by a road the minimum distance for overlooking is 12 metres across a street-Ebley Close in this case.
86. There would be a level of overlooking between the two blocks, as they sit opposite one another with the courtyard walkway separating them. There would be around 20 metres in distance between them which would be 1 metre below the 21 metres recommended within the Southwark Residential Design Guidance. The small shortfall would compromise residential amenity as the units would have windows with multiple aspect and has resulted from a need to provide good quality public realm and pavement widths around the site.

### **Loss of outlook**

87. As previously mentioned Block A would sit opposite the largely blank side elevation of Wickway Court, whilst the curved glazed brick stair core would be impacted there is no real outlook from this space. Similarly, while Block B would sit more directly in front of Westonbit Court the distance between the two blocks combined with the shorter elevation and chamfered corners of the new block, would minimise the impact on outlook. It is acknowledged Westonbit Court did for the most part enjoy a fairly open aspect with views onto Burgess Park and this outlook would be interrupted as a result of the proposal, however the level of harm would not outweigh the overall benefits of the scheme.
88. The outlook from Quedgley Court would also be impacted in terms of outlook as it sits at a slight angle and would have some outlook onto Block B however this is not seen as harmful as it is stepped further away from the new buildings and would still benefit from views onto Burgess Park.

### **Sense of enclosure**

89. Each block would be of taller in height but less wide than the existing blocks within the estate; notwithstanding the differences the blocks maintain reasonable separation distances from existing units. Thus, the proposal is not considered to create a significant sense of enclosure for surrounding properties.

### **Noise**

90. The creation of the new external balconies and amenity areas are not considered to generate a significant additional amount of noise which would

impact on nearby occupiers, due to the distance of the proposed block from nearby properties, and the use being akin to the existing residential towers within the estate.

## **Energy and sustainability**

91. The energy assessment included as part of this application details the range of energy saving measures incorporated into the scheme through the energy hierarchy (Be Lean, Be Clean, Be Green), which result in a 56% carbon emission saving over Part L of Building Regulations.
92. The scheme has included a range of measures including high performance building fabric, high performance lighting (part of Be Lean), and air source heat pumps (as part of Be Clean, and Be Green) which provide the majority of the carbon savings.
93. The site is adjacent to the proposed extension of the SELCHP district heating network. It is therefore proposed to include a designated space within the development for the necessary heat exchange plant and incoming mains connections to future heat networks.
94. It is considered the scheme has assessed a broad swathe of options and where possible implemented measures to achieve a good reduction in carbon emissions. However, the scheme would not achieve a 100% reduction in emissions, and the remaining reductions would be compensated for via an offset payment as part of the S106 agreement. This offset figure would be set at £125,619 in respect of the residential element of the scheme and £15,567 in respect of the non residential uses. Subject to this, the proposal would be acceptable in terms of energy and sustainability.

## **Ecology and biodiversity**

95. The proposal has incorporated a number of features to improve biodiversity around the site as part of the landscaping enhancements to the estate. These measures including planting for pollinating insects, and wildflower meadows. Further improvements shall be secured by condition including bird and bat boxes. Overall, the proposal offers a good opportunity to enhance the ecological value and biodiversity of the estate. The application has been assessed by the ecologist who is satisfied that the proposal would not be harmful to the adjacent Burgess Park.
96. The London Plan 2021 Policy G5 requires developments to include urban greening methods as a means of increasing green cover when designing new buildings and developments. The application scheme achieves the target score of 0.4 through the incorporation of green roofs, tree planting and varied

planting within the scheme.

## **Water resources and flood risk**

97. The applicant has supplied a flood risk assessment as part of this proposal. The site lies within Flood Zone 3. The proposed uses are defined as more vulnerable, however the Strategic Policy 13 of the Core Strategy allows development to occur in the protected Thames flood zone as long as it is designed to be safe and resilient to flooding. The policy further requires major development to reduce surface water run-off by at least 50%.
98. Surface water from the development is proposed to be managed through a combination of sustainable drainage systems (SuDS), including bio-retention tree pits. The surface water discharge rate from the site will be restricted to 4/s/which represents the minimum runoff rate possible for the site.

## **Transport and highways**

### Cycle parking

99. Each Block would have its own cycle storage space located on the ground floor of the block. Access would be available internally with direct access to the central courtyard. The residential parking includes 28 single tier Sheffield stands. There will be two single tier stands provided at the end of the central rows of cycle parking. These will provide extra spacing to accommodate larger cycles.
100. A total of 148 residential cycle spaces would be provided, this would accord the London Plan standards.

6 long stay cycle parking spaces are provided for the community facility and nursery with an additional 20 short stay spaces included within the site.

101. Long stay cycle parking for the community centre and nursery is provided as a free-standing secure and covered store incorporated into the proposed play space. Twenty short stay visitor cycle parking will be provided for all uses within the public realm as Sheffield stands.

### Car parking (Residential)

102. The proposal would be car-free, except for the 9 new disabled parking bays. The remaining residential units will be car-free and not entitled to residents parking permits within either the surrounding CPZ, (to be secured via legal agreement) or any future Estate Permit Parking scheme, (to be secured via rental or lease agreements). The new wheelchair parking bays will be equipped with active electric vehicle charging points.

### Car parking (Nursery)

103. The nursery does not currently have a designated drop-off area, and parents currently park with the unrestricted Ebley Close parking or kerbside. The proposal would widen the street to 6 metres which would allow vehicles to park kerbside without obstructing traffic flow, to facilitate a safe and efficient drop-off and pick up a dedicated 6 m inset bay will be provided. There are no proposed changes to the capacity of the nursery and the levels of vehicular activity at the start and end times are expected to remain constant. The proposal should therefore be an improvement on the current situation.
104. There is a current demand for 4 staff parking spaces, it is proposed that 4 staff permits be made available for staff to apply for parking permits when the estate parking scheme is implemented. This will be included within the details of the legal agreement.

#### Car parking (Community Centre)

105. There is currently no parking available serving the community facility and this will remain unchanged with the current proposal. The existing pay by phone parking is available to visitors.
106. A condition requiring the provision of a minimum of two electric vehicle charging points in the car parking area is recommending. Subject to this and the considerations above the proposal is acceptable in this regard.

#### Servicing and deliveries

107. Delivery vehicles to the site will be able to service dwellings from multiple locations depending on the size of vehicle. The widening to 6 metres and one way operation of Ebley Close will enable delivery vehicles to stop kerbside without obstructing traffic flow. The proposed drop off /loading bay will accommodate car and LGV deliveries for servicing. The majority of deliveries are likely to occur outside peak nursery pick up/drop off times and there is not expected to be a capacity constraint.

#### Refuse

108. Separate refuse stores for the residential blocks, community centre and nursery are provided within the southern extent of the buildings. These will each have a dedicated direct access to the south. Direct links with dropped kerbs are provided between the refuse stores and Ebley Close. Drag distances to the new stores do not exceed 10m, in line with Waste Management Guidance Notes for Residential Developments.

#### Emergency Vehicles.

109. The site layout has been designed in accordance with Manual for Streets (DfT, 2007) and is able to accommodate a fire engine.
110. In summary, the proposal is considered to have appropriately addressed the

delivery and servicing needs of the new units, and these are not deemed to present a risk to the local transport or highways networks.

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

Planning obligation	Mitigation	Applicant's position
<b>Local Economy and Workspace</b>		
Local economy: Construction phase jobs/ contributions	Place a minimum of 19 Unemployed Borough Residents into Sustained Construction Industry Employment  Train a minimum of 19 Borough residents using Short Courses;  Provide a minimum of 4 new Construction Industry Apprenticeships or NVQ Starts;  Ensure that their contractors and sub contractors shall work with the Construction Workplace Co-ordinator and with local employment and skills agencies approved by the council to recruit Borough residents into Construction Industry Apprenticeships; and  Produce the Construction Industry Employment and Training Report.	Agreed
<b>Housing, Viability and Amenity Space</b>		
Affordable (social rent and intermediate) housing	39 x Social Rent units	Agreed

Provision		
Wheelchair housing provision	9 x wheelchair units	Agreed
<b>Transport and Highways</b>		
Highway works	S 278 works to make good the paving around the site	Agreed
<b>Energy, Sustainability and the Environment</b>		
Carbon off-set fund (residential)	£125 ,619	Agreed
Carbon off-set fund (non residential)	£15,567	
<b>Trees</b>		
Arboricultural contributions	£55,200	Agreed
Administration fee	Payment to cover the costs of monitoring these necessary planning obligations calculated as 2% of total sum.	Agreed

111. If in the event that a unilateral undertaking has not been agreed by 31 March 2022 then the Director of the planning and growth be instructed to refuse planning permission for the following reason:

*In the absence of a signed legal agreement, the proposal would fail to provide suitable mitigation in terms of planning gain, contrary to saved policies 2.5 (Planning Obligations) 3, SP14 (Implementation and Delivery) of the LB Southwark Core Strategy 2011, and 8.2 (Planning Obligations) of the London Plan 2016, and the LB Southwark Section 106 Planning Obligations/CIL SPD 2015.*



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

112. Based on the floor areas provided in the agent's CIL Form dated -21, the gross amount of CIL is approximately £xxxx consisting £xxx of Mayoral CIL and £xxx of Borough CIL. It should be noted that this is an estimate, and the floor areas will be checked when related CIL Assumption of Liability Form is submitted after planning approval has been obtained.

In addition, there is potential for the council to claim full CIL social housing relief for this 100% affordable housing proposal, as the landowner and developer. All CIL relief claim must be submitted by the project manager prior the commencement of development.

## **Community involvement and engagement**

113. The Developer's Charter included as part of this application submission outlines the positive steps taken by the applicant in engaging the local community. This includes details of meetings with Tenants and Residents Associations (T&RAs), local ward members, and open public events to explain and understand resident's concerns around issues including design and daylight/sunlight impacts. It is considered that the applicant has actively engaged with the local community and adopted their comments and concerns into the final proposal, which is welcomed.

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

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

114. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
115. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
116. 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.

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

The lack of affordable housing disproportionately impacts on people from Black, Asian and Minority Ethnic backgrounds. The provision of over 50% social rented housing will help address this. The nursery and community centre on the site provides a valuable social resource for the local community, these will be re provided, avoiding any potential harm to groups with protected characteristics.

### **Human rights implications**

118. 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.
119. This application has the legitimate aim of providing new affordable housing. 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**

120. 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.
121. 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 statutory determination date?	A time extension has been sought to allow for the completion of the unilateral undertaking and referral to the GLA

### **CONCLUSION**

122. The proposal would result in 86 much needed homes which will contribute towards the council's target of 11,000 new council homes, and be of a high standard of accommodation and design for residents. The proposal would have a minimal impact on nearby neighbouring amenity and the adjacent Burgess Park Metropolitan Open Land; and, subject to appropriate mitigation measures, would have an acceptable and management impact on the local transportation network. In addition, the proposal would improve landscaping bio-diversity and play facilities across the Estate to the benefit of the wider estate and community.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Chief Executive's Office 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 5354 Council website: <a href="http://www.southwark.gov.uk">www.southwark.gov.uk</a>

## APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Planning History
Appendix 4	Recommendation

## AUDIT TRAIL

<b>Lead Officer</b>	Colin Wilson, Head of Strategic Planning	
<b>Report Author</b>	Sonia Watson, Team leader	
<b>Version</b>	Final	
<b>Dated</b>	24 August 2021	
<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>		24/08/2021

## Consultation undertaken

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

**Press notice date:** 04/02/2021

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

**Neighbour consultation letters sent:** 17/05/2021

### Internal services consulted

Local Economy  
 Design and Conservation Team [Formal]  
 Ecology  
 Environmental Protection  
 Highways Development and Management  
 Urban Forester  
 Waste Management  
 Transport Policy

### Statutory and non-statutory organisations

London Fire & Emergency Planning Authori

Metropolitan Police Service (Designing O

Thames Water  
 Great London Authority  
 Environment Agency

### Neighbour and local groups consulted:

Flat 8 Westonbirt Court Ebley Close  
 Flat 16 Westonbirt Court Ebley Close  
 Flat 13 Westonbirt Court Ebley Close  
 Flat 11 Westonbirt Court Ebley Close  
 33 Cator Street London Southwark  
 Flat 1 Wickway Court Cator Street  
 Flat 1 Willsbridge Court Bibury Close  
 Flat 91 Wickway Court Cator Street  
 Flat 108 Wickway Court Cator Street  
 Flat 32 Wickway Court Cator Street  
 Flat 19 Cam Court Gloucester Grove  
 Estate Bibury Close  
 Flat 7 Westonbirt Court Ebley Close  
 Flat 14 Westonbirt Court Ebley Close  
 Flat 1 Westonbirt Court Ebley Close  
 Flat 7 Quenington Court Ebley Close

Flat 33 Quedgeley Court Ebley Close  
 Flat 28 Quedgeley Court Ebley Close  
 Flat 11 Quedgeley Court Ebley Close  
 Flat 24 Cam Court Gloucester Grove  
 Estate Bibury Close  
 Flat 11 Cam Court Gloucester Grove  
 Estate Bibury Close  
 Westonbirt Court Ebley Close London  
 Flat 24 Willsbridge Court Bibury Close  
 Flat 22 Willsbridge Court Bibury Close  
 Flat 2 Willsbridge Court Bibury Close  
 Flat 10 Willsbridge Court Bibury Close  
 Flat 70 Wickway Court Cator Street  
 Flat 69 Wickway Court Cator Street  
 Flat 102 Wickway Court Cator Street  
 Flat 47 Wickway Court Cator Street

Flat 41 Wickway Court Cator Street  
 Flat 14 Wickway Court Cator Street  
 Flat 2 Alder House Alder Close  
 29 Davey Street London Southwark  
 Flat 9 Quedgeley Court Ebley Close  
 19A Cator Street London Southwark  
 Flat 6 Cam Court Gloucester Grove  
 Estate Bibury Close  
 Flat 10 Quedgeley Court Ebley Close  
 Flat 30 Westonbirt Court Ebley Close  
 25 Cator Street London Southwark  
 Flat 1 Cam Court Gloucester Grove  
 Estate Bibury Close  
 Flat 29 Westonbirt Court Ebley Close  
 Flat 31 Quenington Court Ebley Close  
 Flat 54 Wickway Court Cator Street  
 Flat 76 Wickway Court Cator Street  
 Flat 107 Wickway Court Cator Street  
 Flat 52 Wickway Court Cator Street  
 Flat 5 Westonbirt Court Ebley Close  
 Flat 82 Wickway Court Cator Street  
 Flat 35 Wickway Court Cator Street  
 17A Cator Street London Southwark  
 Flat 4 Westonbirt Court Ebley Close  
 Flat 5 Quedgeley Court Ebley Close  
 Flat 20 Quedgeley Court Ebley Close  
 Flat 6 Willsbridge Court Bibury Close  
 Flat 15 Willsbridge Court Bibury Close  
 Flat 75 Wickway Court Cator Street  
 Flat 106 Wickway Court Cator Street  
 Flat 58 Wickway Court Cator Street  
 Flat 44 Wickway Court Cator Street  
 Flat 34 Wickway Court Cator Street  
 Flat 7 Alder House Alder Close  
 Flat 13 Alder House Alder Close  
 Flat 30 Quenington Court Ebley Close  
 Flat 14 Quenington Court Ebley Close  
 Flat 34 Quedgeley Court Ebley Close  
 Flat 32 Cam Court Gloucester Grove  
 Estate Bibury Close  
 Flat 31 Cam Court Gloucester Grove  
 Estate Bibury Close  
 Flat 3 Cam Court Gloucester Grove  
 Estate Bibury Close  
 Flat 12 Quedgeley Court Ebley Close  
 Flat 23 Westonbirt Court Ebley Close  
 41 Cator Street London Southwark  
 Street Record Cator Street London  
 29 Cator Street London Southwark  
 Flat 22 Quedgeley Court Ebley Close  
 Flat 16 Willsbridge Court Bibury Close  
 Flat 4 Willsbridge Court Bibury Close

Flat 84 Wickway Court Cator Street  
 Flat 15 Westonbirt Court Ebley Close  
 Flat 71 Wickway Court Cator Street  
 Flat 117 Wickway Court Cator Street  
 Flat 105 Wickway Court Cator Street  
 Flat 103 Wickway Court Cator Street  
 Flat 40 Wickway Court Cator Street  
 Flat 16 Cam Court Gloucester Grove  
 Estate Bibury Close  
 Flat 9 Alder House Alder Close  
 Flat 3 Alder House Alder Close  
 Flat 17 Alder House Alder Close  
 Flat 24 Quenington Court Ebley Close  
 Flat 30 Quedgeley Court Ebley Close  
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 Flat 23 Willsbridge Court Bibury Close  
 13 Davey Street London Southwark  
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 Flat 4 Quenington Court Ebley Close  
 Flat 32 Quedgeley Court Ebley Close  
 Flat 36 Cam Court Gloucester Grove  
 Estate Bibury Close  
 Flat 9 Cam Court Gloucester Grove  
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 Flat 9 Willsbridge Court Bibury Close  
 Flat 20 Willsbridge Court Bibury Close  
 Flat 11 Willsbridge Court Bibury Close  
 27 Davey Street London Southwark  
 7 Davey Street London Southwark  
 Alder House Alder Close London  
 Flat 23 Cam Court Gloucester Grove  
 Estate Bibury Close  
 Flat 10 Cam Court Gloucester Grove  
 Estate Bibury Close  
 Flat 35 Cam Court Gloucester Grove  
 Estate Bibury Close  
 Flat 33 Cam Court Gloucester Grove  
 Estate Bibury Close  
 Flat 12 Cam Court Gloucester Grove  
 Estate Bibury Close  
 31 Davey Street London Southwark  
 Flat 8 Willsbridge Court Bibury Close  
 Flat 78 Wickway Court Cator Street  
 Flat 72 Wickway Court Cator Street  
 Flat 110 Wickway Court Cator Street  
 Flat 60 Wickway Court Cator Street  
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 9 Davey Street London Southwark

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 Flat 23 Quenington Court Ebley Close  
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 Flat 13 Cam Court Gloucester Grove  
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 Flat 5 Quenington Court Ebley Close  
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 Flat 25 Quedgeley Court Ebley Close  
 Flat 5 Willsbridge Court Bibury Close  
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 Flat 96 Wickway Court Cator Street  
 Flat 67 Wickway Court Cator Street  
 Flat 50 Wickway Court Cator Street  
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 Flat 63 Wickway Court Cator Street



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 Flat 19 Quenington Court Ebley Close  
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 Flat 29 Quedgeley Court Ebley Close  
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 Flat 15 Quedgeley Court Ebley Close  
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 Flat 19 Westonbirt Court Ebley Close  
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 Street Record Ebley Close London  
 Flat 56 Wickway Court Cator Street  
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 Flat 21 Cam Court Gloucester Grove  
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 23A Cator Street London Southwark  
 Flat 94 Wickway Court Cator Street  
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 Flat 109 Wickway Court Cator Street  
 Flat 104 Wickway Court Cator Street  
 Flat 53 Wickway Court Cator Street  
 Flat 42 Wickway Court Cator Street  
 Flat 12 Wickway Court Cator Street  
 Flat 5 Alder House Alder Close  
 Flat 16 Alder House Alder Close  
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 21 Davey Street London Southwark  
 15 Davey Street London Southwark  
 Flat 8 Quenington Court Ebley Close  
 Flat 32 Quenington Court Ebley Close  
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 Flat 20 Quenington Court Ebley Close  
 Flat 2 Quedgeley Court Ebley Close  
 Flat 8 Cam Court Gloucester Grove  
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 Flat 26 Westonbirt Court Ebley Close  
 Flat 2 Cam Court Gloucester Grove  
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 Flat 16 Quenington Court Ebley Close  
 Quenington Court Ebley Close London  
 Flat 13 Wickway Court Cator Street  
 Flat 21 Westonbirt Court Ebley Close  
 Street Record Longhope Close London  
 2 Davey Street London Southwark  
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 35 Davey Street London Southwark  
 Wickway Court Cator Street London  
 Cam Court Gloucester Grove Estate  
 Bibury Close London  
 15 Cator Street London Southwark  
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 Flat 22 Cam Court Gloucester Grove  
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 Flat 23 Quedgeley Court Ebley Close  
 Flat 3 Willsbridge Court Bibury Close  
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 Flat 112 Wickway Court Cator Street  
 Flat 101 Wickway Court Cator Street

Flat 66 Wickway Court Cator Street Flat 64 Wickway Court Cator Street Flat 55  
Wickway Court Cator Street Flat 33 Wickway Court Cator Street Flat 31 Wickway  
Court Cator Street Flat 17 Wickway Court Cator Street Flat 15 Wickway Court  
Cator Street Flat 11 Wickway Court Cator Street Flat 18 Alder House Alder Close  
Flat 11 Alder House Alder Close

**Re-consultation:**

## Consultation responses received

### Internal services

Design and Conservation Team [Formal]  
Ecology  
Highways Development and Management  
Urban Forester  
Transport Policy

### Statutory and non-statutory organisations

Metropolitan Police Service (Designing O  
Thames Water  
Environment Agency

### Neighbour and local groups consulted

Flat 8 106 Chandler Way London  
69 Coleman Road London SE5 7TF  
126 Crystal Palace Rd London SE22 9ER  
33 Trafalgar Avenue London SE15 6NP  
53 Andoversford Court Bidbury Close London  
79 Blakes Road 79 London  
14 Cam Court, Bibury Close Peckham  
Flat 32 Leyland Court Sumner Rd London  
20 Garnies Close London  
160 Tooley Street London SE1  
160 Tooley Street London SE1  
160 Tooley Street London  
20 Garnies Close Peckham SE15 6H



## Relevant Planning History

Reference and Proposal	Status
No relevant planning history	



**OPEN**

**COMMITTEE:**

**PLANNING COMMITTEE**

**MUNICIPAL YEAR 2020-21**

**NOTE:**

Original held in Constitutional Team; all amendments/queries to Gregory Weaver, Constitutional Team, Tel: 020 7525 7055

**OPEN**

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Councillor Richard Livingstone	1		
Councillor Damian O'Brien	1		
Councillor Cleo Soanes	1		
Councillor Dan Whitehead	1		
Councillor James Coldwell	1		
Councillor Bill Williams	1		
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Councillor Radha Burgess (reserve)		Sarah Newman	1
Councillor Victor Chamberlain (reserve)			
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Councillor Nick Johnson (reserve)		Louise Neilan	
Councillor Eleanor Kerlake (reserve)			
Councillor James McAsh (reserve)		<b>LEGAL TEAM</b>	
Councillor Victoria Mills (reserve)		Jonathan Gorst	1
Councillor Margy Newens (reserve)			
<b>MEMBER OF PARLIAMENT (Paper and Electronic)</b>		<b>CONSTITUTIONAL TEAM</b>	
Helen Hayes MP, House of Commons, London, SW1A 0AA	1	Gregory Weaver	8
		<b>TOTAL PRINT RUN</b>	25

List Updated: 27 August 2021