

Planning Committee

Tuesday 20 July 2021

6.30 pm

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

Membership

Councillor Martin Seaton (Chair)
Councillor Kath Whittam (Vice-Chair)
Councillor James Coldwell
Councillor Richard Livingstone
Councillor Cleo Soanes
Councillor Dan Whitehead
Councillor Damien 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

INFORMATION FOR MEMBERS OF THE PUBLIC

Access to information

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

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The council is committed to making its meetings accessible. Further details on building access, translation, provision of signers etc for this meeting are on the council's web site: www.southwark.gov.uk or please contact the person below.

Contact: Greg.weaver@southwark.gov.uk

Members of the committee are summoned to attend this meeting

Eleanor Kelly
Chief Executive
Date: 12 July 2021



Planning Committee

Tuesday 20 July 2021

6.30 pm

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

Order of Business

Item No.	Title	Page No.
	PART A - OPEN BUSINESS	
	PROCEDURE NOTE	
1.	APOLOGIES	
	To receive any apologies for absence.	
2.	CONFIRMATION OF VOTING MEMBERS	
	A representative of each political group will confirm the voting members of the committee.	
3.	NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	DISCLOSURE OF INTERESTS AND DISPENSATIONS	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	MINUTES	3 - 7
	To approve as a correct record the Minutes of the open section of the meeting held on 6 July 2021.	
6.	ARTICLE 4 DIRECTIONS RELATING TO DEMOLITION AND CHANGE OF USE FROM COMMERCIAL BUILDINGS TO RESIDENTIAL	8 - 257

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7.	DEVELOPMENT MANAGEMENT	258 - 261
7.1.	BECKET HOUSE, 60-68 ST THOMAS STREET, LONDON, SE1 3QU	262 - 456
7.2.	1 BANK END (SITE RAILWAY ARCHES AND THAMES HOUSE BOUNDED BY STONEY STREET, CLINK STREET AND PARK STREET) SE1.	457 - 571

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 sub-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.”



Planning Committee

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

1. The reports are taken in the order of business on the agenda.
2. The officers present the report and recommendations and answer points raised by members of the committee.
3. The role of members of the planning committee is to make planning decisions openly, impartially, with sound judgement and for justifiable reasons in accordance with the statutory planning framework.
4. Please note that, due to ongoing coronavirus measures, speakers must register to speak by no later than 5pm, 1 working day before the meeting.
5. 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.

6. 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.
7. Speakers should lead the committee to subjects on which they would welcome further questioning.

8. 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.
9. 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.
10. This is a council committee meeting which is open to the public and there should be no interruptions from the audience.
11. No smoking is allowed at committee.
12. 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.

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PLANNING COMMITTEE

MINUTES of the Planning Committee held on Tuesday 6 July 2021 at 6.30 pm at Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

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

OTHER MEMBERS PRESENT: Councillor Ian Wingfield

OFFICER SUPPORT: Colin Wilson (Head of Regeneration)
 Dipesh Patel (Group Manager)
 Gemma Usher (Team Leader)
 Victoria Lewis (Team Leader)
 Pip Howson (Team Leader – Transport Policy)
 Michael Tsoukaris (Group Manager Design & Conservation)
 Jonathan Gorst (Head of Regeneration & Development Team – Legal Services)
 Gregory Weaver (Constitutional Officer)

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:

Addendum report relating to items 6.1 and 6.2

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

The Chair noted that the application referred to in item 6.2 was within their ward.

5. MINUTES

That the minutes of the meeting held on 21 April 2021 be 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.

6.1 21-23 PARKHOUSE STREET, LONDON, SE5 7TQ

Planning Application: Application 19/AP/0469

PROPOSAL:

Demolition of existing building at 21-23 Parkhouse Street and erection of two blocks (Block A and Block B) of 5 and part-7/part- 10

storeys.

Block A comprises a 5-storey block for commercial/employment use (879sqm) and Block B comprises a part-7/part 10-storey block with ground floor commercial/employment use (111sqm) and 33 residential dwellings, accessible car parking, cycle parking, refuse storage, and associated landscaping.

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 Ian Wingfield 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 as amended was moved, seconded, put to the vote and declared carried:

RESOLVED:

- a) That planning permission be granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.
- b) In the event that the requirements of paragraph 1 above are not met by 31st December 2021, the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 266.
- c) That members note and consider the amendments to the report and amendment to the drawing numbers of condition 1 of Appendix 3 of the committee item in reaching their decision.

6.2 SHOPPING CENTRE SITE ELEPHANT AND CASTLE, 26 28 30 AND 32 NEW KENT ROAD, ARCHES 6 AND 7 ELEPHANT ROAD AND LONDON COLLEGE OF COMMUNICATIONS SITE, LONDON SE1

Planning application: Application 21/AP/1104

PROPOSAL:

Minor material amendments to planning permission 20/AP/3675 (for Phased, mixed-use redevelopment of the existing Elephant and Castle shopping centre and London College of Communication sites comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 35 storeys above multi-level and single basements, to provide a range of uses including residential (use class C3), retail (use Class A1-A4), office (Use Class B1), Education (use class D1), assembly and leisure (use class D2) and a new station entrance and station box for use as a London underground operational railway station, means of access, public realm and landscaping works, parking and cycle storage provision, plant and servicing areas, and a range of other associated and ancillary works and structures.

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.

The committee put questions to the objector.

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

The Committee heard a statement in support of the application from a member of the public who lived within 100 metres of the development site.

There were no questions for the resident.

There were no ward councillors present who wished to speak.

The committee discussed the application.

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

RESOLVED:

- a) That planning permission be granted subject to conditions, referral to the Greater London Authority (GLA), and a variation and endorsement to the s106 agreement for planning permission 16/AP/4458.
- b) That the environmental information be taken into account as required by Regulation 26 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- c) That following issue of the decision it be confirmed that the Director of Planning and Growth shall place a statement on the Statutory Register pursuant to Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations and that for the purposes of Regulation 30(1)(d) the main reasons and considerations on which the Local Planning Authority's decision is based shall be set out as in this report, and shall inform the Secretary of State of the decision.

CHAIR:

DATED:

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Item No. 6	Classification: Open	Date: 20 July 2021	Meeting Name: Planning Committee
Report title:		Article 4 Directions relating to demolition and change of use from commercial buildings to residential	
Ward(s) or groups affected:		All	
From:		Director of Planning and Growth	

1. RECOMMENDATIONS

That the Planning Committee:

1. Approves non-immediate Article 4 Directions to withdraw the permitted development rights granted by Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ('the GPDO') for changes of use from office use (Class E(g)(i)) to a dwellinghouse (Class C3) in the Central Activities Zone and railway arches in Southwark.
2. Approves immediate Article 4 Directions to withdraw the permitted development rights granted by Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ('the GPDO') for changes of use from Commercial, Business and Leisure (Class E - except offices) to a dwellinghouse (Class C3) in the Central Activities Zone and railway arches in Southwark.
3. Approves immediate Article 4 Directions to withdraw the permitted development rights granted by Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ('the GPDO') for changes of use from Commercial, Business and Leisure (Class E) to a dwellinghouse (Class C3) in the following locations:
 - Town centres including primary and secondary shopping frontages and New Southwark Plan Site Allocations inside town centres
 - Secondary shopping frontages outside of town centres
 - New Southwark Plan Site Allocations outside of town centres
 - New Southwark Plan proposed Strategic Protected Industrial Land
4. Approves immediate Article 4 Directions to withdraw the permitted development rights granted by Schedule 2, Part 20, Class ZA (amended) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ('the GPDO') (for demolition of commercial buildings and construction of new dwellinghouses in the following locations:
 - Central Activities Zone
 - Town centres including primary and secondary shopping frontages and New Southwark Plan Site Allocations inside town centres

- New Southwark Plan Site Allocations outside of town centres
 - New Southwark Plan proposed Strategic Protected Industrial Land
5. Notes the equalities impact assessment of the proposed Article 4 Directions (Appendix C).
 6. Delegates to the Director of Planning and Growth the arrangements for making the Article 4 Directions including compliance with the notification requirements under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).
 7. In the event of expected new legislation and updates to the Town and Country Planning (General Permitted Development) Order 2015 (as amended), delegates authority to the Director of Planning and Growth to update the wording of the new Article 4 Directions relating to Class ZA (from Class B1a-c to Class E(g)(i-iii).

2. BACKGROUND INFORMATION

8. The changes to the Use Classes Order came into effect in September 2020 which amalgamated many uses which were formally contained in Class A1-A3 (retail), Class B1 (offices, research and development and light industrial) and Class D (leisure and community) into a new Class E and new Class F. Changes of use between any of the uses listed in Class E (ranging from certain retail, employment, health, leisure and education uses) no longer constitute development. Class E now contains the following provisions:
 - **E(a)** Display or retail sale of goods, other than hot food
 - **E(b)** Sale of food and drink for consumption (mostly) on the premises
 - **E(c)** Provision of:
 - **E(c)(i)** Financial services,
 - **E(c)(ii)** Professional services (other than health or medical services), or
 - **E(c)(iii)** Other appropriate services in a commercial, business or service locality
 - **E(d)** Indoor sport, recreation or fitness (not involving motorised vehicles or firearms)
 - **E(e)** Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)
 - **E(f)** Creche, day nursery or day centre (not including a residential use)
 - **E(g)** Uses which can be carried out in a residential area without detriment to its amenity:
 - **E(g)(i)** Offices to carry out any operational or administrative functions,
 - **E(g)(ii)** Research and development of products or processes
 - **E(g)(iii)** Industrial processes

9. Article 4 Directions relating to Use Classes before 1 September 2020 remain in effect until 31 July 2021. This applies to a number of Article 4s the council currently have.
10. The Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 2) Order 2020, Part 1 Schedule 2 Part 20 introduced new permitted development rights which came into force on 31 August 2020. This included Class A, AA, AB, AC and AD which allowed “upward extensions” (subject to Prior Approval) to build additional storeys of residential on top of existing blocks of flats or detached or terraced commercial buildings or houses. The amendment also introduced Class ZA, which, subject to prior approval, permits the demolition of existing vacant buildings (vacant for a period of at least 6 months prior to the date of the application) and the construction of new dwellings being constructed in their place. The new permitted development right ZA applies to a single purpose-built detached block of flats and any other single detached building comprising either one or a combination of the former Class B1 (a-c) which includes offices, research and development and light industrial uses.
11. On 3 December 2020, the government published a consultation which included proposals for a new Use Class E to residential Permitted Development Right (PDR). This consultation closed on 28 January 2021. The Government’s intention behind these changes is to provide greater flexibility to meet the challenges of changing consumer behaviour, faster planning decisions, and the delivery of more homes to tackle the housing shortage. The consultation responses highlighted considerable concerns about the negative impact of this change.
12. On 31 March 2021, the government announced that it is introducing legislation for England to bring forward the new Use Class E to residential PDR from 1 August 2021, with some amendments from the consultation proposals. The proposal would allow all uses within Class E (commercial, business and service) to change to use Class C3 residential under a new class MA in the General Permitted Development Order (GPDO).
13. To take advantage of the PDR, applicants need to submit a Prior Approval application. Prior Approval is not a planning application because permission has been granted via the GPDO and so only certain conditions prescribed by law can be considered. The Prior Approval process contains a wider range of conditions than previously suggested in the original consultation (such as natural daylight, sustainability of conservation areas, incompatibility in industrial areas, impact on registered nurseries/health centres). There is a size limit of 1,500sqm and the premises must have been in commercial use for 2 years and vacant for three continuous months prior to an application for prior approval.
14. The local authority considers whether the proposal meets the requirements of the PDR conditions in determining the application, rather than applying planning policies. There is a statutory period of determination and if a decision is not made within 56 days prior approval is automatically granted

(unless an extension of time is formally agreed). The right will attract a fee of £100 per dwelling house, up to a maximum of £5,000. The PDR for Class E is only for changes of use and does not allow for operational development.

15. On 13 May 2021 the Government opened a technical consultation on the consequential changes to permitted development rights. This is predominantly to align the General Permitted Development Order 2015 (as amended) with the new Class E rights. It proposes to delete, amend or supersede many of the existing permitted development rights which relate to the old use classes. The consultation closed on 3 June 2021.
16. The recent government consultation on National Planning Policy Framework (NPPF) changes closed on 8 February 2021 and consultation responses are currently being analysed. The changes included a proposal to change paragraph 53 of the NPPF which deals with Article 4 Directions.
17. On 23 March 2021 the Housing, Communities and Local Government Committee launched a new inquiry to examine the Government's approach to permitted development rights. This included a call for evidence from interested parties. The first session of the Inquiry took place on 17 May 2021.
18. On 1 July 2021, the Secretary of State for Housing, Communities and Local Government issued a Written Ministerial Statement outlining the forthcoming wording for Article 4 Directions in the NPPF.
19. The new paragraph 53 of the National Planning Policy Framework will read:

The use of Article 4 directions to remove national permitted development rights should:

- *where they relate to change from non-residential use to residential use, be limited to situations where an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre)*
 - *in other cases, be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities)*
 - *in all cases, be based on robust evidence, and apply to the smallest geographical area possible.*
20. The Statement requires that Article 4 directions should be very carefully targeted, applying only to those locations where they are necessary to avoid wholly unacceptable adverse impacts. The geographical coverage of all Article 4 directions should be the smallest area possible to achieve the aim of the Article 4 direction. In respect of historic high streets and town centres, this is likely to be the irreducible core of a primary shopping area. It is very unlikely to be applicable to a broad area, and is not expected to be applied to

an entire local authority area. Local authorities will need to have robust evidence to justify the Article 4 direction and the area it covers.

21. In advance of the publication of the revised National Planning Policy Framework, the Statement requires local authorities to follow this new policy when they consider making new Article 4 directions so that they can assure themselves and their communities that the Article 4 direction is necessary and meets the higher threshold.
22. This report outlines the reasons for the geographical areas covered by the proposed Article 4 Directions in the relevant section. The evidence by the GLA also supports this approach (Appendix D). As required by the NPPF, the report justifies why, in the areas outlined, Article 4 directions are necessary to avoid wholly unacceptable adverse impacts on the CAZ, Southwark's town centres, secondary shopping frontages, railway arches, site allocations and industrial land. The maps of the areas affected are included in Appendix B.

3. ARTICLE 4 DIRECTIONS PROCESS

23. An Article 4 Direction can be used to remove specific permitted development rights in all or parts of the local authority's area. It would not restrict development altogether, but instead ensure that development requires planning permission. A planning application for the proposal would need to be submitted that would then be determined in accordance with the development plan.
24. Article 4 Directions must apply to all uses within the relevant use class and it cannot restrict changes within the same use class.
25. The government's on-line National Planning Practice Guidance (NPPG entitled "When is permission required?") sets out guidance on the use of Article 4 Directions. The NPPG states that an Article 4 Direction to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. It also states that in deciding whether an Article 4 Direction would be appropriate, local planning authorities should identify clearly the potential harm that the direction is intended to address (paragraph 038).
26. Article 4 Directions can either be immediate or non-immediate depending upon when notice is given of the date on which they come into force. The process for making and confirming a non-immediate Article 4 Direction is as follows:
 - *Stage 1 (the current stage) - The council decides whether to go ahead and introduce a Direction setting a date in the Notice for when the Direction will come into force which must be at least 28 days and no more than 2 years after representations can first be made, which is usually after the last publication/service date;*
 - *Stage 2 – Publication/Consultation stage. The council:-*
 - 1) *publishes the notice of direction in a local newspaper;*

- 2) *formally consults with general members of the public and the owners and occupiers of every part of the land within the area or site to which the Direction relates over a period of at least 21 days;*
 - 3) *and places notices up on site for 6 weeks;*
- *Stage 3 – On the same day that notice is given under Stage 2 above, the council refers its decision to the Secretary of State who has wide powers to modify or cancel a Direction;*
 - *Stage 4 – Confirmation Stage - The council cannot confirm the Direction until after a period of at least 28 days from publication/service of the Notice. Once a Direction has been confirmed, the council must give notice of the confirmation in the same way as it gave notice of the initial direction, and must specify the date that the direction comes into force. A copy of the direction as confirmed must also be sent to the Secretary of State.*
27. The process for making and confirming an immediate Article 4 Direction is as follows:
- *Stage 1 (the current stage) - The council makes an Article 4 Direction withdrawing permitted development rights with immediate effect;*
 - *Stage 2 – Publication/Consultation stage. The council:-*
 - 1) *publishes the notice of the Direction in a local newspaper;*
 - 2) *formally consults with general members of the public and the owners and occupiers of every part of the land within the area or site to which the Direction relates over a period of 21 days;*
 - 3) *and place notices up on site for not less than six weeks;*
 - *Stage 3 – On the same day that notice is given under Stage 2 above, the council refers its decision to the Secretary of State who has powers to modify or cancel a Direction.*
 - *Stage 4 –Confirmation Stage - The Direction comes into force on the date on which the notice is served on the owners/occupiers of the land. The council has between 28 days from the date of when the notice comes into effect and six months to decide whether to go ahead and confirm the Direction, taking into account any representations which have been received. If confirmation this does not happen within six months, the Direction will lapse.*

4. COMPENSATION

28. In some circumstances the council can be liable to compensate developers or landowners whose developments are affected by Article 4 Directions. Local planning authorities are liable to pay compensation to landowners who

would have been able to develop under the permitted development rights that an Article 4 Direction withdraws, if they:

- Refuse planning permission for development which would have been permitted development if were not for an Article 4 Direction; or
 - Grant planning permission subject to more limiting conditions than the GPDO would normally allow.
29. Compensation may also be claimed for abortive expenditure or other loss or damage directly attributable to the withdrawal of permitted development rights. 'Abortive expenditure' includes works carried out under the permitted development rights before they were removed, as well as the preparation of plans for the purposes of any work.
30. Loss or damage directly attributable to the withdrawal of permitted development rights would include the depreciation in the value of land or a building(s), when its value with the permitted development right is compared to its value without the right.
31. However, the compensation arrangements differ for cases where a development order in respect of prescribed development is being withdrawn. The definition of prescribed development can be found in regulation 2 of the Town and Country Planning (Compensation) (England) Regulations 2015 (as amended). In cases such as these compensation is not payable if the following procedure is followed, as set out in section 108 of the Town and Country Planning Act:
- The planning permission withdrawn is of a prescribed description as set out in the Town and Country Planning (Compensation) Regulations 2015 (as amended).
 - The permitted development right is withdrawn in the prescribed manner.
 - Notice of withdrawal is given in the prescribed manner:
 - Not less than 12 months before it takes effect.
 - Not more than the prescribed period of two years.
32. Permitted development rights granted by Schedule 2, Part 3, Class MA and Part 20 Class ZA are prescribed development, which means that compensation may be payable for 12 months from the date that the immediate Direction comes into force. If more than 12 months notice of the withdrawal were given no compensation would be payable as in the case of the non-immediate Directions proposed for Class MA (Class E(g)(I) offices in the CAZ and railway arches.

5. PLANNING APPLICATIONS

33. If permitted development rights are withdrawn and planning permission is required, the council would be obliged to determine the proposal in accordance with the development plan unless material considerations indicate otherwise. In Southwark's case, the development plan includes the

London Plan, the Core Strategy, saved policies in the Southwark Plan and adopted area action plans. The New Southwark Plan will replace the Core Strategy and Southwark Plan once it is adopted.

6. EFFECT ON EXISTING ARTICLE 4 DIRECTIONS

34. The new permitted development right for Class MA will replace Class O and part of Class M as they previously related to the change of use of office and retail premises to dwellings. Through the technical consultation, the Government propose to amend the Class M PDR to continue to allow the change of use from hot food takeaways, betting offices, pay day loan shops or launderette (which are sui generis uses) to residential C3 use. The right will provide for prior approval on the adequate provision of services only as a launderette. All other details remain unchanged, including the lower maximum 150sqm size limit. The Article 4 Direction relating to change of use from Class M (including hot food takeaways, betting shops, pay day loan shops or laundrettes) to residential use in railway arches will continue to apply.
35. The GPDO legislation provides that any existing Article 4 Directions which protects office floor space (previously B1a) from being converted to residential (C3) will remain in effect until 31 July 2022. The following Article 4 Directions will remain in place until 31 July 2022 when they will be replaced by the proposed non-immediate directions proposed in this report.
 - Change of use from **offices** to residential in the **CAZ**
 - Change of use from **offices** to residential in **railway arches**
36. The council's existing Article 4 Directions relating to the following will expire on 31 July 2021 and will be replaced by the immediate Article 4 Directions for Class MA as proposed in this report.
 - Changes of use in **town centres** (these directions were affected by the use classes changes in 2020 and updates to the General Permitted Development Order)
 - Changes of use from **light industrial** to residential in site allocations and industrial land (PDR rights Class P and PA relating to Class B1c (light industrial) and B8 (storage and warehousing) have already expired, however light industrial uses will now be able to change to residential under the new Class E to C3 PDR Class MA).
 - Changes of use from light industrial and storage (B1c) and distribution uses (B8) to residential in **railway arches** has already expired. Changes of use from Class M (retail) to residential in railway arches will partially be replaced by the Class MA Direction which will capture the update to Class E (retail uses). The Class M Article 4 Direction in railway arches insofar as it relates to betting shops, payday loan shops, laundrettes and hot food takeaways will still apply.

37. The council's existing Article 4 Directions relating to the following will remain in place and unaffected by the changes:
- Demolition, change of use or alteration of **pubs**
 - **Heritage** Article 4 Directions (Sunray Estate and the Old Southern Railway Stables and Forge)
 - Change of use from dwellings to **Houses in Multiple Occupation** in Bywater Place and Henshaw Street

7. PRIOR APPROVAL

38. Prior approval is an application to discharge the conditions pertaining to the PD right so the scope of the issues which are material to the prior approval application are fixed and fixed exclusively by the terms of the order. Therefore, no consideration can be given to the statutory development plan or the National Planning Policy Framework (NPPF) unless the GPDO specifically provides for this.
39. Below are the list of conditions required to be assessed under prior approval for Class MA:
- the impact of that change of use on the character or sustainability of the conservation area;
 - transport impacts of the development, particularly to ensure safe site access;
 - contamination risks in relation to the building;
 - flooding risks in relation to the building;
 - impacts of noise from commercial premises on the intended occupiers of the development;
 - where
 - the building is located in a conservation area; and
 - the development involves a change of use of the whole or part of the ground floor,
 - the impact on the local provision of the type of services lost.
 - the provision of adequate natural light in all habitable rooms of the dwelling houses;
 - the impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses; and
 - where the development involves the loss of services provided by a:
 - registered nursery; or
 - health centre maintained under section 2 or 3 of the National Health Service Act 2006
40. In addition, developers will need to submit a floor plan showing the total floor space in square metres of each dwelling house. This will be subject to the national space standards requirements. There is a requirement to notify adjoining owners and occupiers of the intended change of use.

41. The list of conditions for Class MA of the GPDO is substantially longer and more ambiguous than the existing classes (O and M – offices and retail to residential). Some of the prior approval assessment conditions are ambiguous and would normally require a matter of judgement based on amenity policies in the local plan. However these conditions will now become a matter of law some which may require legal definition. The confusion surrounding these points (and others) could result in refusals, more appeals, more litigation, and the intended benefits of the PDR never being realised.
42. For Class ZA (relating to demolition of flats or commercial buildings), where the existing building is situated on land that forms part of a conservation area, a site of special scientific interest; or the building is listed or on land within its curtilage or a scheduled monument or land within its curtilage, it does not benefit from permitted development. The existing building must have been constructed before 31 December 1989 and the footprint must not exceed 1,000 square metres and the height must not be greater than 18 metres or 7 metres higher than the existing building (whichever is lower). Further restrictions are detailed in the legislation.
43. The Town and Country Planning (Use Classes) (Amendment) England Regulations 2020 Regulation 3 provides for a “material period” for the transition of the former use classes to the new use classes which expires on the 31 July 2021. The new Article 4 Direction for Class MA refers to the new legislation that will be in place from 1 August 2021. The Government’s technical consultation outlined the changes that were suggested for Class M and Class ZA to take into account the new Town and Country Planning (Use Classes) Order 1987 (as amended 2020). However the results of the consultation have yet to be published and new legislation has not yet been made.
44. The only amendment to Class ZA proposed in the technical consultation indicated that *‘Minor technical changes will be made to update the right to align with the current use classes: E (g). All other details remain unchanged’*. It is considered appropriate therefore to make an Article 4 Direction prior to 31 July 2021 with reference to the existing use classes. If the legislation is updated before 31 July, the recommendations include that Committee approve delegated authority to update the wording of the Article 4 Direction to change the reference to the new use classes proposed.
45. Class M currently allows for the change of use of, shops (A1), financial and professional services (A2), and hot food takeaways (A5) betting office, pay day loan shop or launderette, to residential (C3). There is currently a size limit on this of maximum 150sqm. Premises for the display or retail sale of goods, and financial, professional, or other services now fall within Class E and therefore benefit from the Class MA right (maximum 1,500sqm size limit). However through the technical consultation, the Government propose to amend Class M right to continue to allow the change of use from hot food takeaways, betting offices, pay day loan shops or launderette to residential C3 use. The right will provide for prior approval on the adequate provision of services only as a launderette. All other details remain unchanged, including

the lower maximum 150sqm size limit. This permitted development right will continue to be restricted in railway arches based on the council's current Article 4 Direction in place.

46. There is no exemption from CIL from PDR but usually the in-use building exemption will apply if at least part of the building has been occupied for a lawful use for at least six months continuously in the last three years.

8. KEY ISSUES FOR CONSIDERATION

NEW SOUTHWARK PLAN

47. The New Southwark Plan ('NSP') was submitted to the Secretary of State for Examination in January 2020. Subsequently two independent planning inspectors were appointed to examine the Plan and the Examination in Public took place from February to April 2021. The council is preparing to consult on the Main Modifications to the NSP over the summer. Since the plan was submitted, significant changes were made to legislation relating to the Use Classes Order and the council has subsequently proposed changes to policies to ensure the Plan is up to date.
48. The council was required to submit evidence on strategic matters to ensure the plan is sound. This included ensuring the council had clear and justified targets based on evidence of need for future office, industrial and retail provision in the borough.
49. The following sections focus on the evidence base and associated risks relating to PDR for the different areas of the borough for which the Article 4 Directions are proposed. These draw on the evidence base recently examined in detail by the Inspectors at the Examination in Public. The references to evidence base are included as reference numbers as they appear on the Examination webpages for the New Southwark Plan. The introduction of permitted development rights to change Class E premises to residential would undermine the council's ability to proactively implement the NSP policies as recently examined and meet its identified strategic targets for commercial development and affordable housing.

CENTRAL ACTIVITIES ZONE

OFFICES

50. The Central Activities Zone (CAZ) covers London's geographic, economic and administrative core. The CAZ is an internationally and nationally significant office location and a key driver of the London and UK economy. The recently adopted London Plan shows the CAZ is projected to need to accommodate more than 367,000 additional office jobs and 3.5 million sqm

of office floorspace over the period 2016-2041 London-wide. This accounts for 59% of the total office employment growth in London overall (Table 6.1). Policy SD5(E) of the London Plan states the Mayor will work with boroughs and support them to introduce Article 4 Directions to remove office to residential permitted development rights across the whole of the CAZ.

51. In Southwark the CAZ incorporates Bankside, Borough, London Bridge and Elephant and Castle. It contains two London Plan designated opportunity areas: Bankside, Borough and London Bridge and Elephant and Castle. These are areas in which significant growth is expected as outlined in the London Plan and New Southwark Plan growth targets.
52. The CAZ contains over 80% of the total office jobs within Southwark. The majority of new office space planned for to meet current projected demand would be delivered in the CAZ. The main forecast demand is for a significant volume of Grade A office space with increasing demand for this space to respond to flexible working, natural light, technology-enabled and stylish design trends. The Southwark Employment Land Study (2016) recognises that flexible and smaller business uses are required in the Bankside and Borough employment land cluster, to ensure vital support space is not being lost.
53. Southwark's Economic Wellbeing Strategy 2017-22 seeks to make Southwark a place where businesses thrive and prosper. The strategy notes the scarcity of land for business in the borough, the need for new office space and the pressure for residential development. The strategy sets out to protect the functions of the CAZ and encourage growth in areas within and connected to the CAZ with a balance of uses providing a mix of homes, employment, commercial and leisure opportunities.
54. The council has been collaborating with the GLA and other boroughs to make Article 4 Directions to cover the CAZ as supported by the Mayor of London and the London Plan. Strategic evidence prepared by the GLA is endorsed by Southwark in the making of this Article 4 Direction and is attached as Appendix D.
55. The Article 4 Direction is proposed in recognition of the significant economic function of the CAZ and the need to retain and grow office space to support projected demand in Southwark and in the wider London context. This report sets out the justification for a non-immediate Article 4 Direction which is recommended to come into force from 1 August 2022 when the existing Article 4 Direction for offices will expire.
56. As set out below, permitted development rights for the change of use from office to residential in Southwark's CAZ would have implications for office locations of great significance to London and the UK's economy. Southwark's CAZ is often referred to commercially as part of the now well recognised South Bank office market. The nationally significant stock of office space provides a unique concentration of businesses contributing to employment

growth. Demand for new office space is already outstripping supply from both existing and permitted office space.

Office floorspace growth

NSP Target (Amended Policy SP4): Deliver 460,000sqm office floorspace between 2019 and 2036 (equating to around 35,500 jobs)- Around 80% of new offices will be delivered in the Central Activities Zone.

57. The Southwark Employment Land Study 2016 indicates that 460,000 sqm of net additional office employment floorspace is needed, principally large office space in the CAZ. Many allocation sites contain existing employment floorspace. In the CAZ site allocations, the NSP policy requires the re-provision of the existing quantum of employment space as a minimum or 50% of the total floorspace, whichever is greater.
58. Offices have been prioritised in the CAZ by requiring the re-provision or additional provision of the existing employment uses on site allocations in the NSP. In the CAZ vision areas of Bankside/Borough, London Bridge, Blackfriars Road and Elephant and Castle site allocations, 445,130 sqm (net provision of 211,103 sqm) of office floorspace is expected to come forward on the site allocations.
59. Planning applications in Elephant and Castle are also resulting in a significant net uplift in office floorspace including a combined total of 27,542sqm net increase (Skipton House 18/AP/4194 and 5-9 Rockingham Street 19/AP/0750).
60. In addition, a further uplift of employment floorspace will potentially come forward from commercial only development proposals relevant to the site allocations within the CAZ, which will create an additional net total of 66,595sqm (115,342sqm) in gross floorspace) if planning permission is granted for those schemes.
61. In the CAZ, the re-provision or uplift of employment floorspace is a 'must' requirement in the site allocations due to the priority of delivering office floorspace in the CAZ based on evidence of demand. Housing is a 'should' which encourages mixed use development where the re-provision or uplift of employment floorspace can be achieved. Our housing requirements are met through Site Allocations which 'must' provide housing. The council does not rely on site allocations which 'should' provide housing to meet its housing land supply targets. The council's five and fifteen year housing land supply (EIP198a) shows that Southwark has a sufficient supply of land to meet its five year housing requirement of 14,665 net homes including a 20% buffer brought forward from later in the plan period, with a surplus of 1,165 homes. Southwark also has a sufficient supply of land to meet its six to fifteen year housing target of 23,550 net homes, with a surplus of 9,860 homes.

62. The New Southwark Plan contains allocations for development sites in the CAZ requiring an uplift in office floorspace to meet these targets alongside the delivery of new homes. Some of these sites contain existing offices and their conversion to residential could prevent comprehensive redevelopment.
63. Offices are central to providing employment in Southwark both for residents and workers across a much wider area. Overall job numbers are highly dependent on the CAZ and its vicinity as is the high level of jobs growth seen in recent years. Offices account for the majority of future jobs forecast and this expansion of employment would be undermined by the uncontrolled loss of offices to residential.

Employment and jobs

NSP Target (Amended Policy SP4): 58,000 total jobs between 2019 and 2036 including at least 1,000 new green jobs through the Southwark Green New Deal. The targets for the distribution of jobs in the CAZ are:

Borough, Bankside and London Bridge Opportunity Area	10,000
Elephant and Castle Opportunity Area	10,000

64. These are broadly consistent with the Opportunity Area targets in the London Plan however the NSP contains a target to deliver in excess of the jobs distribution reflected in the London Plan for the CAZ, which is reflected above. The net increase of office floorspace projected for the CAZ vision areas is 298,645sqm. Using the Employment Densities Guide (2015) average employment density for offices of 11sqm per employee, this could generate up to 27,150 office jobs. Additional jobs would come forward in retail, leisure arts and community sectors.
65. In addition, the Elephant Park redevelopment is estimated to generate 5,000 jobs in construction. The council partnered with Lendlease in 2016 to commission the Southwark Construction Skills Centre at Elephant and Castle, which supports residents to access pre-employment training, gain employment and progress in their careers by up-skilling. The centre supports developers to fulfil their section 106 employment and skills obligations on sites across the borough, offering a site for engaging local people with the construction industry and providing residents with the skills they need to enter and progress in the sector. Since July 2016 over 4,000 Southwark residents have received training at the centre.
66. The London Labour Market Projections 2017 report, Southwark employment is projected to grow 0.89% per annum 2016-2041 (2,850 jobs pa). The evidence base relating to jobs and growth and the need for employment/land floorspace is contained within SP412 (Employment Land Review,

2016).(ELR). This drew on information from the SP413 Industrial Land and Warehousing Study. The ELR is supplemented by the Old Kent Road Workspace Demand Study, 2019 (SP431) and the Affordable Workspace Evidence of Needs in Southwark report 2019 (SP422).

67. Employment in Southwark has grown rapidly since 2000, increasing by 41%, or 74,000 jobs, from 2000 to 2013. In London Plan terms Southwark is an Inner London borough and forms part of the Central London Sub-Region. Employment is concentrated in the north of the borough in London's Central Activities Zone. The northern wards which make up the Southwark CAZ account for over 90% of all office employment in the borough, largely in the professional services sector. Employment in Southwark grew by 41% from 2000 to 2013, compared to 21% for Lambeth, 8% for Lewisham and 16% for London. This represents approximately 74,000 additional jobs in Southwark, which is nearly 10% of the increase in jobs across London over this period. The ELR estimates that just under half, 46.5%, of all jobs in Southwark are in B-space activities. Of this total 41.5% are in office type employment and 5.0% are in industrial employment. The proportion of B-space jobs is highest in CAZ at 56.3%, of which 51.9% are office jobs.
68. 91.1% of all office jobs are in the Southwark CAZ compared with 72.8% of all jobs. Industrial jobs are also more strongly represented in the CAZ which has 63.0%, compared to 26.3% in the CAZ Hinterland, whilst the South of the borough accounts for 13.9%. The local service area in the South of the borough accounts for just 4.4% of office jobs and 9.1% of total jobs. Economic activity rates in Southwark are above the London average but so are unemployment rates.

HISTORICAL TRENDS AND PLANNING APPLICATIONS

69. Between 2000 and 2012, office stock significantly increased in the borough (SP412). Large planning applications significantly changed the function and character of Southwark's Central Activity Zone (CAZ). This is owed to the regeneration of the Southbank, delivery of More London (Tooley Street/riverside, completed in 2009) and schemes such as Neo Bankside (permitted in 2006, completed in 2013). Our AMR (SP425) shows that from 2011/2012 to 2018/2019 there was 350,724sqm of employment floorspace that was redeveloped. The majority of this was industrial uses. There has been a net loss of around -28,914 of B1 floorspace (majority B1c uses) and a net loss of -72,012sqm of B2 and B8 floorspace (completions data). However the gross increase of over 235,222 of B1 space overall (majority B1a) has shown growth in offices over this time period. The gross amount of floorspace completed was 249,798sqm. There has been a loss overall of -100,926sqm over this time period (majority B8).
70. These new office schemes included The Shard and the News Building at London Bridge and schemes on Blackfriars Road including 20 Blackfriars Road, an 18 storey modern office building.

71. In terms of approvals a similar pattern is evident, with an overall loss of -107,226sqm of B1 floorspace, of which the majority is a loss of B1c light industrial floorspace. There was also a loss of -84,438sqm B2 and B8. 571,637sqm was existing employment floorspace (majority industrial) which has been approved for redevelopment. Gross figures show over 363,615sqm of delivery of B1 floorspace (majority B1a offices). The total gross amount of floorspace approved is 379,973sqm. There has been a loss overall in approvals of -191,664sqm over this time period (majority B8). There has been significant growth in office floorspace through approvals and completions but these have replaced older industrial stock through regeneration in the north of the borough owing to a net overall loss in employment (B class) floorspace overall.
72. The London Office Policy Review (LOPR) (Ramidus Consulting Limited in association with CAG Consulting. Greater London Authority; June 2017) sets out the employment forecasts and capacity. Office employment projections indicate an increase in 619,300 jobs from 1.98m in 2016 to 2.60m in 2041, a rise of 31%. This therefore indicates a need for employment floorspace growth to accommodate these jobs. At the London level, there is sufficient potential capacity in the pipeline to accommodate projected growth, through increasing density of office sites and developing sites with no existing employment floorspace.
73. It is recognised that the CAZ in Southwark is relatively limited in capacity for employment floorspace. Southwark is currently redeveloping existing employment sites to increase density of office floorspace, to increase provision and developing appropriate sites as illustrated in the New Southwark Plan's site allocations to further increase the capacity and availability of office floorspace to meet demand. These sites are attracting office floorspace development in the CAZ and Opportunity Areas.

74. The LOPR indicates that take up in South sub-market where Southwark is located sees a general increase in take-up since 2012. This indicates demand for office floorspace in the south sub-market, which requires policy intervention from Southwark Council to ensure this is met. This will be achieved through the provision site allocations and requirement of employment floorspace.
75. The report also indicates that even prior to the relaxation of Permitted Development Rights, that CAZ boroughs were losing office stock. Southwark's AMR figures show a net loss employment floorspace in the years 2011/12 to 2018/2019. The New Southwark Plan therefore plans for the delivery of office space to meet the identified demand.
76. Between 2013 and 2015, the borough lost 21,787sqm of office floorspace to residential development. This loss justifies the need to now protect and increase office floorspace, especially within strategic locations.

SECTORS AND AGGLOMERATION BENEFITS

77. The largest employment sector for both Southwark residents and Southwark workers is the property, professional, scientific and technical sector. In 2011 this sector employed over 20% of Southwark workers but only around 14% of Southwark residents.
78. The Southwark Employment Land Study (ELS) 2016 identifies the Southwark CAZ as being part of the principal economic cluster for professional scientific and technical services in London. It has attracted professional and business services such as legal and accountancy services, advertising and market research which will continue to grow as a sector.
79. Many of the businesses within Southwark's CAZ come together in Business Improvement Districts (BIDs): Team London Bridge, Better Bankside, South Bank and We Are Waterloo. When the council successfully sought the exemption for the CAZ in the GPDO in 2013, BIDs wrote in support of the application. The council also received letters from Better Bankside and We are Waterloo BIDs in support of an Article 4 Direction to maintain planning controls for office to residential conversions in 2018.
80. The concentration of large numbers of office-based businesses in Southwark's CAZ leads to increased productivity, access to a large pool of labour, collaboration, and transfer of knowledge, innovation and technology between businesses. Along with the character and reputation of the CAZ this improves the competition, efficiency and global competitiveness of Southwark, London and the UK. This agglomeration is boosted by exceptional levels of transport connectivity.

81. The Southwark ELS (2016) describes how the improvement of the environment in Southwark's CAZ in recent years, the Jubilee Line extension, development of large scale offices and the local cultural offer have supported the growth of professional and creative business clusters. Developments at Bankside, More London, The Place and The Shard have added 550,000 sqm of prime office space to help create a critical mass for agglomeration.
82. An Article 4 Direction would allow planning controls to maintain the concentration of businesses which add to the character and amenity of Southwark's CAZ as well as underpinning economic activity and wellbeing.

CONTRIBUTIONS TO STRATEGIC INFRASTRUCTURE

83. Change of use from office to residential without planning permission in Southwark's CAZ would undermine contributions to strategic infrastructure. The impact on funding could be significant given the amount of potential future office space. The GLA has highlighted the success of the Mayoral Community Infrastructure Levy (CIL) 1 and MCIL 2 (excluding Elephant and Castle OA) to fund strategic transport infrastructure, namely Crossrail and Crossrail 2, essential to supporting the agglomeration of business functions in the CAZ and their contribution to the local and national economy and employment.
84. Development granted planning permission must also pay Southwark CIL to help fund strategic health, education, parks and transport infrastructure. This will include the extension of the Bakerloo Line, enabling delivery of 20,000 homes and 10,000 jobs in Old Kent Road as well as growth in New Cross and Lewisham. It will transform connectivity in south-east London, increase the capacity and resilience of London's transport network and provide opportunities for improved wellbeing and enhanced local amenity for quality of life. The potential for business rate retention will also make an important contribution to strategic infrastructure funding packages in the future, including the Bakerloo Line extension. This funding would be reduced by the loss of office floorspace and potential loss of higher density mixed use redevelopment.

CONTRIBUTION TO ECONOMY

85. Offices in Southwark's CAZ contribute to the economy both within and far beyond the local area. The GLA has compiled strategic evidence to support the introduction of Article 4 Directions in the CAZ for office to residential permitted development rights (Appendix D). It calculates that in 2019 the output of the CAZ and Northern Isle of Dogs combined was £214 billion, accounting for almost half of London's output and around 11 per

cent of UK output. Southwark is an economically competitive borough and contains a large portion of the South Bank office market.

86. The strength of the office-based economy in Southwark's CAZ is underpinned by its strategic location. Businesses can access major transport hubs at Waterloo, Elephant and Castle and London Bridge and are well connected to the City, Midtown and West End markets north of the river. Major international firms from a range of sectors have taken up premises in the area including business and professional services.
87. The strategic evidence provided by the GLA concludes that the CAZ provides an irreplaceable contribution to the prosperity of the UK thanks to established policy support for offices. Offices in Southwark's CAZ bring the opportunities provided by strategic economic activity close to residents. There are deprived areas in the north of the borough and their proximity to the CAZ provides opportunities for those most in need. An Article 4 Direction would prevent harm to economic wellbeing locally, city-wide and nationally.

CENTRAL LONDON OFFICE MARKET TRENDS

88. The stock of office space in Southwark's CAZ is substantial and has grown in recent years to accommodate a variety of businesses in growing clusters benefitting from agglomeration and providing employment as well as supporting the national economy. Office space in the CAZ has been growing since 2000 and now amounts to almost 20 million sqm, which is over a fifth of the UK's total. The Southwark ELS indicates that the borough's office stock grew from 1 to 1.3 million sqm between 2000 and 2012 due to the regeneration of the South Bank and delivery of More London as well as smaller schemes. The CAZ and the Northern Isle of Dogs are projected to accommodate a net increase of 367,000 jobs and 3.5 million sqm (GIA) office space over the period 2016-2041 (LOPR, 2017, London Plan Policy SD5).
89. Despite the expansion of office stock long term projections underpinning both the London Plan and New Southwark Plan point to demand outstripping supply. The Southwark ELS reasons that the regeneration of Southwark's CAZ will continue to strengthen its appeal for business and that there are positive underlying drivers of demand for office space. The sensitivity of location underlines the need to protect office stock that is already in highly suitable locations for business.
90. Clearly these trends must be considered in light of the ongoing COVID-19 pandemic. Most offices have now been closed for 16 months however as restrictions are easing some are gradually reopening. Whilst many organisations are considering changes to their working practices and future use of office spaces, it is difficult to predict the future trends of the market based on the unprecedented uncertainty from the pandemic.

91. Union Street Partners have continued to produce a quarterly research report on the take-up and investment trends in the South Bank office market. In their latest (April 2021) research report states that take-up levels for Quarter 1 were very subdued with just 36,209 sqft transacting across 9 deals, down 54% quarter on quarter and nearly 4 times lower than Q1 2020. The South Bank market has been very quiet whilst the country remained in lockdown and USP report it is difficult to pull out any specific trends.
92. USP report that *“internal viewing numbers do however paint an improving picture of activity and we are witnessing an increase in negotiations across multiple size brackets. Despite a cautious start viewing numbers are back to pre-pandemic levels and in March we recorded a record month of viewings, evidence that there is market activity of which we hope will translate into deals as the year progresses. The pandemic has made companies re-think the way they live and work with agility being key for larger occupiers along with flexibility. The serviced office market has suffered a turbulent 12 months with the sector usually accounting for a quarter of office Take-up per year (five-year average). As occupiers continue to strategise there will be a need for short term flexible office space.”*
93. In 2018, USP reported that the availability rate in the South Bank office market is 3.4%, well below the recommended 8% vacancy rate for efficient market operation and lower than the rates for the West End, Midtown and City. In 2021, USP report that availability levels have nearly doubled since the start of the global pandemic (now at 6%).
94. USP report that *“the increase in available space this quarter has been driven by the Second-hand Grade A market (up 28% quarter-on-quarter) with little additional refurbished space coming to the market and a reduction in Grade B space which is likely driven by landlords withdrawing poorer space with the aim of refurbishing it. There remains no true brand-new space immediately available to occupy on the South Bank with no new buildings coming to the market since Q4 2019. This is set to change during the year with six buildings due to complete adding 396,391 sq ft of new or significantly refurbished available space to the market. Most of this space will complete in the next six months. Currently 79% of available stock on the market and immediately available is second-hand so the arrival of the newly refurbished office space will increase the choice of top-quality accommodation for occupiers.”*
95. The council has continued to see major large scale office development proposals in the planning pipeline in the CAZ over the duration of the pandemic, with schemes such as 25 Lavington Street (20/AP/1009) for 50,000sqm office floorspace gaining approval subject to S106 agreement at Planning Committee in December 2020. 19/AP/0830 Landmark Court for 19,500sqm offices was approved with S106 in January 2021.

27,000sqm offices above Southwark Underground station (NSP17, 20/AP/1189) were approved subject to S106 at Planning Committee in March 2021. Lend Lease have also recently submitted proposals for a large scale office development (50,000sqm) on Plot H1 at Elephant Park (21/AP/1819) which demonstrates continued appetite for building new Grade A office space. This indicates some continued faith in the office market for the future by developers. A mixed use development including offices and retail is under construction at 185 Park Street (NSP03, Bankside area). On site allocation NSP16 (Blackfriars Road area) mixed use development including offices is under construction at Sampson House and Ludgate House. On site allocation NSP19, a hotel and office development is under construction at 18 Blackfriars Road.

96. Within this context there is still a concerning threat to office space and office-based businesses posed by the competing demand for homes. The GLA's London Office Policy Review (2017) highlights the pressure for residential development with little likelihood of change in the future. The Southwark ELS demonstrates that projected housing growth will negatively impact employment floorspace. The London Plan (para 6.1.6) states that outside the exemption zones, more than 1.9 million sqm of office space had received prior approval to change to residential by March 2018, mostly in town centres in west and south London and in areas around the CAZ fringe. There are concerns that office to residential permitted development rights are having a disproportionate impact on occupied office floorspace and on SMEs and it could undermine the potential to deliver significantly more housing through more intensive forms of mixed use development, particularly in town centres.
97. Existing small and secondhand office premises are more likely to be at risk from office to residential permitted development rights as they would be more readily converted into flats compared to large floorplate or new recently fitted out offices. These are likely to be occupied by the small and micro enterprises who are at the most risk of displacement by rising rents and lack of availability of workspace. This reduces the availability of low cost workspace (as required by Policy E2 of the London Plan) and limits the availability of affordable workspace in the borough.
98. The delivery of new offices is also put at risk. The ELS forecasts a high need for new Grade A, large floorplate office space to serve the professional services market where there is little available supply at present. These offices will require the delivery of strategic scale development in Southwark's CAZ. The profile of opportunity sites identified during the preparation of the New Southwark Plan suggests that suitable sites will usually have an existing employment land-use, often offices. Opportunistic conversion of these offices to residential could undermine their comprehensive redevelopment to achieve greater levels of new office provision alongside new homes. The pipeline of existing planning permissions and site allocations in the NSP illustrates that sites with existing offices are coming forward for redevelopment to provide improved office space. The New Southwark Plan allocates sites to

achieve the delivery of new office space in the CAZ and their delivery could be undermined by permitted development rights where these prevent sites with existing offices being available for comprehensive redevelopment. Sites that are within the CAZ are recognised in the plan as being the most in demand for office delivery and are required to contribute to this growth by providing an increase in the amount of employment floorspace.

OFFICE AND RESIDENTIAL VALUES

99. The profits that could be realised would provide a strong incentive for conversion from office to residential under permitted development rights due to differences in value between the land uses. The GLA's strategic evidence (see Figure E.5, Appendix D) suggests that average residential values exceed average office and retail values in central London. In inner London, average residential values are typically greater than average office and retail values.
100. The Southwark ELS 2016 discusses the threat of high value residential in Southwark's CAZ creating pressure to convert and for businesses to have to relocate out of the borough or occupy poorer quality space. The study identifies a problem with office rental values dropping away from the riverside putting the second tier businesses that support the highest value CAZ firms at risk. It also draws attention to the risk to any future supply if potential development land can be outbid by residential developers. This would be exacerbated if residential could be established as the existing use through the tactical use of the permitted development rights. This is particularly a risk for smaller offices and workspaces vital to SMEs which are most at risk from conversion to residential. There is therefore a high likelihood of the harm to the economy, agglomeration, strategic infrastructure delivery, employment and the market for smaller office spaces, makerspaces and units offering low cost and affordable workspace for start-ups and SMEs. The GLA highlight the cumulative nature of this impact that requires management through a planned approach to office and residential development in the CAZ.

CENTRAL ACTIVITIES ZONE: OTHER CLASS E USES

101. Southwark's part of the CAZ contains the two Opportunity Areas of London Bridge, Bankside and The Borough, and Elephant and Castle. It also contains the two district town centres of London Bridge and Borough and Bankside and the major town centre of Elephant and Castle. Throughout the preparation of the NSP, the council has proposed extensions to some town centres and protected shopping frontages. This is to include important retail areas which contribute to the vitality of the town centre, for the day and night-time economies.

Retail, leisure and community uses in Class E

The NSP Target (Amended Policy SP4) for net new retail floorspace between 2019 and 2036 is 76,670 sqm, (6,560sqm convenience retail, 42,130sqm comparison goods retail, 27,980sqm food and beverage).

The targets for the distribution of the retail floorspace that include the CAZ are:

Elephant and Castle Major Town Centre	10,000sqm
CAZ and district and local town centres	19,670sqm

102. NSP Table 1B supporting Policy SP1b demonstrates how retail, leisure and community floorspace is expected to change based on the capacities identified in site allocations within each Vision Area. There is no specific target for leisure and community floorspace however the town centre sites allow for the capacity of retail, leisure, community and other main town centre uses to increase to support the growth and vitality of town centres in the borough.
103. In the CAZ vision areas of Bankside/Borough, London Bridge, Blackfriars Road and Elephant and Castle site allocations, 66,143sqm (net provision of 34,518sqm) of retail, community and leisure floorspace is planned to come forward on the site allocations in the CAZ.
104. CAZ Site Allocations identify opportunities or require retail, leisure and community uses where they could improve streets and strengthen centres with active frontages. In some instances, re-provision of specific existing uses is required. The NSP includes a new definition of retail and community uses and has removed reference to the old use classes to ensure the definition is clear and up to date about the uses that are required.

Retail, community or leisure uses:

- E(a) Display or retail sale of goods, other than hot food
- E(b) Sale of food and drink for consumption (mostly) on the premises
- E(c) Provision of:
 - E(c)(i) Financial services,
 - E(c)(ii) Professional services (other than health or medical services),
 - or
 - E(c)(iii) Other appropriate services in a commercial, business or service locality
- E(d) Indoor sport, recreation or fitness (not involving motorised vehicles or firearms)
- E(e) Provision of medical or health services (except the use of premises)

attached to the residence of the consultant or practitioner)

- E(f) Creche, day nursery or day centre (not including a residential use)
- F1(b) Display of works of art (otherwise than for sale or hire)
- F1(c) Museums
- F1(d) Public libraries or public reading rooms
- F1(e) Public halls or exhibition halls
- F1(f) Public worship or religious instruction (or in connection with such use)
- F1(g) Law courts
- F2(b) Halls or meeting places for the principal use of the local community
- F2(c) Areas or places for outdoor sport or recreation (not involving motorised vehicles or firearms)
- F2(d) Indoor or outdoor swimming pools or skating rinks
- Appropriate sui generis town centre uses (for example: public house, wine bar or drinking establishment, a venue for live music performance, a cinema, a concert hall, a bingo hall, a dance hall, subject to site specific circumstances)

105. The loss of retail, community and leisure uses would undermine the strategic priorities of the CAZ, namely arts, culture, leisure, entertainment, retailing, tourism and specialist egic functions of the CAZ. Due to the unique and significant role of the CAZ in London and the UK as a whole, it is important to plan residential development carefully. Permitted development rights would result in an ad hoc approach to housing provision which could impact on the strategic functions of the CAZ and could lead to overall amenity issues for future residents.

Industrial and research Class E uses

106. As noted in paragraphs 69-76, there has historically been a change from the amount of industrial land located in the CAZ and has been redeveloped as the role of central London has changed to match changing market trends towards office space. However industrial premises that do still function in the CAZ have changed to accommodate small workshops, maker spaces and small-scale manufacturing. These would now fall under Class E (g)(iii) and would be at risk from permitted development conversions to residential. The CAZ also contains some Class E (g)(ii) uses (research and development) which contribute to world class research emerging from the heart of London. The loss of research uses would undermine the strategic priorities of the CAZ, namely uses connected with science, technology of regional, national and international importance, centres of excellence for higher and further education and research, centres of medical excellence and associated specialist facilities (London Plan, para 2.4.4). An example would be the London Bridge Health Cluster (NSP49) which includes health, research and education facilities associated with Guys and St Thomas Hospital.

TOWN CENTRES

Site Allocations and Growth Targets

107. The London Plan projects that 18% employment growth (109,400 office jobs and 1.1 million sqm office floorspace) is projected in Inner London (outside CAZ) (Table 6.1). As an Inner London borough containing part of the CAZ, Southwark is importantly placed to deliver substantial office growth in its part of the CAZ and in other key office locations in the borough, including our town centres outside the CAZ. Policy E1 of the London Plan supports the retention of existing viable office floorspace capacity outside the CAZ, supported by borough Article 4 Directions where appropriate, facilitating the redevelopment, renewal and re-provision of office space where viable.
108. 12% of the approvals application data for changes to B1 floorspace were a result of prior approvals and permitted development to change the use of B1a office or B1c light industrial floorspace to residential. This has resulted in -16,502sqm of losses of B1 floorspace over the period 2011/2012 – 2018/2019.
109. There has been a significant loss of office floorspace in Southwark and across London due to permitted development rights. This is owed to the implementation of permitted development rights permitting the change of use from residential to office floorspace. The CAZ was originally exempt from the office to residential permitted development right when it was first introduced in 2015. This exemption was subsequently lifted, and the CAZ boroughs (including Southwark) made Article 4 Directions in 2018 to continue to protect the CAZ from office to residential permitted development rights. Therefore these losses relate to the impact of the permitted development right (Class O – offices to residential) outside of the CAZ.
110. Furthermore the trends indicating a loss of B use class is further outlined in paragraphs 69-76. This sets out the growth in permitted development approvals for conversions since October 2015 when the PDR was made permanent. Since 2011 there has been a significant decrease in (former) Class B1 floorspace approvals and completions.

NSP Target (Amended Policy SP4): Providing at least 58,000 new jobs between 2019-2036.

The targets for the distribution of jobs outside the CAZ are:

Canada Water Opportunity Area	20,000
Old Kent Road Opportunity Area	10,000

Other town centres	8,000

111. The Old Kent Road AAP and Existing and Proposed (EIP149) demonstrate how we will double the number of existing jobs in the opportunity area, achieving a net uplift in 10,000 jobs.
112. The Canada Water Masterplan is estimated to deliver between 12,000 and 30,000 jobs on completion. The 20,000 jobs figure is in the London Plan.
113. Development on other town centre sites such as Peckham and Camberwell as well as other site allocations and windfall sites would deliver the remainder of jobs to meet this target.
114. The impact of permitted development rights in town centres would decrease the amount of jobs available and make it harder to achieve net increases in jobs and employment opportunities.

NSP Target (Amended Policy SP4): Deliver 460,000sqm office floorspace between 2019 and 2036 (equating to around 35,500 jobs). Around 20% of new offices will be delivered outside the Central Activities Zone.

Old Kent Road

115. The Old Kent Road Existing and Proposed document (EIP149) sets out the total employment floorspace provision in the Old Kent Road masterplan. This figure is used to inform the employment target in Table 1b in the NSP (see EIP82b for the latest figures). The total amount of employment floorspace planned to come forward on the Old Kent Road site allocations is 46,452sqm and the masterplan plans for a variety of employment spaces using the strategy “from laptops to forklifts”. Some offices may be provided in town centre locations however the area will also deliver a range of light industrial and creative workspaces.

Canada Water

116. The Rotherhithe area could deliver a minimum of 22,196sqm net increase in offices. If the Canada Water masterplan delivered its maximum parameters the Rotherhithe area could deliver 258,244sqm of offices (so an additional 236,048 sqm to the minimum scenario).
117. Office delivery overall would therefore be 388,471sqm net based on the minimum scenario at Canada Water and 664,519sqm maximum scenario. It is likely the target would be achieved with significant growth in offices at Canada Water.

118. Other parts of the borough such as town centres will also deliver offices. NSP Policy P29 requires that planning applications in town centres replace existing employment uses on the site, improving the overall stock.

Town centres and site allocations

119. The other vision areas outside of the main CAZ vision areas, Old Kent Road Opportunity Area and Rotherhithe would deliver a net increase of employment of 9,169sqm.
120. If small scale office space in town centres is lost to residential, this would result in a net loss of office space and make it difficult to achieve the net gain in office floorspace that is required by the NSP targets and the evidence of need and demand.

NSP Target (Amended Policy SP4): Increasing retail floorspace by 76,670 sqm between 2019 and 2036 (6,560sqm convenience retail, 42,130sqm comparison goods retail, 27,980sqm food and beverage).

The targets for the distribution of the retail floorspace are:

Elephant and Castle Major Town Centre	10,000sqm
Peckham Major Town Centre	7,000sqm
Canada Water Major Town Centre	40,000sqm
CAZ and district and local town centres	19,670sqm

121. The overall target for retail floorspace provision is 76,670 sqm net. This is broken down into 6,560 sqm net convenience floorspace, 42,130 sqm net comparison floorspace and 27,980 sqm net food and beverage floorspace. Growth of retail will mainly be accommodated in the redevelopment of three large shopping centres within the major town centres of Elephant and Castle, Peckham and Canada Water. Old Kent Road will also be transformed from an area dominated by retail warehouses with large car parks to a Healthy High Street.
122. The distribution of retail floorspace is: 10,000 sqm Elephant and Castle Major Town Centre, 7,000 sqm Peckham Major Town Centre, 40,000 sqm Canada Water Major Town Centre, the rest of the retail demand (19,670 sqm) would be met by sites in the CAZ and in the district town centres. Table 1B supporting Policy SP1b (EIP82b) demonstrates how retail, leisure and community floorspace is expected to change based on site allocation capacity estimates in each Vision Area. There is no specific target for leisure and community floorspace however the town centre sites allow for the capacity of retail, leisure, community and other main town

centre uses to increase to support the growth and vitality of town centres in the borough.

123. The retail floorspace in Old Kent Road has reduced to an overall net loss in the December 2020 masterplan. This is due to the changing format of how retail space will be delivered in the area. The NSP designates two district town centres for the Old Kent Road area (north and south). The Publication London Plan (2020) anticipates that district town centres typically contain 10,000-50,000sqm retail, leisure and service floorspace. The Old Kent Road Opportunity Area currently contains 75,000sqm of retail floorspace. The area will redevelop a significant amount of existing retail space which is currently 'big box' retail sheds and mixed use development will significantly improve the retail environment by providing a range of shop sizes from supermarkets to high street shops. The Old Kent Road masterplan also includes provision for health and education uses. The overall net loss of retail is fairly minimal on a plan-wide level of 1,143sqm taking into account new retail, community, leisure, education and health uses that will be provided.
124. Table 1B states the expected capacity for retail, leisure and community floorspace is 81,501sqm (net). This figure uses the minimum expected capacity in the Canada Water masterplan. There is scope for additional retail, leisure and community uses in the Canada Water masterplan outline planning application if a higher range is accommodated between the minimum and maximum floorspace estimations. If the maximum retail, leisure and community uses capacity will come forward in the Canada Water masterplan, this will result in a total net provision of 218,849sqm. Additional retail, leisure and community uses may also come forward on smaller scale windfall sites in town centres.

Town Centre Hierarchy and Existing Retail Provision

125. The GLA strategic evidence (Appendix D) includes reference to a recent report "The retail sector in London and the impact of the coronavirus on trends" (GLA Economics 2021).
126. In contrast to wider concerns about the decline of high streets nationally, the total number of retail and leisure outlets in London's town centres and high streets increased by 0.1 per cent and 0.5 per cent respectively over the period 2015 to 2019. Vacancy rates in London's town centres and high streets are typically well below those experienced in other parts of the country. In 2019 the London shop vacancy rate was 9.0 per cent, which is more than three percentage points lower than the rate for Britain (12.1 per cent) (see Figure 5.3 in Appendix D). The average vacancy rates for town centres and high streets were 8.5 per cent and 9.4 per cent respectively which translates to 3.6 and 2.7 percentage points lower (respectively) than the average vacancy rate for Britain. A recurring theme across Southwark is low vacancy rates. As data from Southwark's

Protected Shopping Frontage surveys shows that vacancy rates remained low in 2020, this implies that its Major, District Town Centres and Local Centres still have a prime role for retail.

127. The table below, *Existing Retail Provision in LB Southwark*, provides a summary of existing retail provision in 2014. At the time of this study Tower Bridge Road, Old Kent Road North and Old Kent Road South were not designated as town centres. The NSP designates Elephant & Castle and Walworth Road as one major town centre.

Centre	Number Shop Units	Convenience Floorspace (m ² gross)	Comparison Floorspace (m ² gross)	Food and Beverage (m ² gross)
Peckham Major Centre	384	22,280	27,270	7,080
Canada Water Major Centre	135	9,500	19,928	7,240
Elephant & Castle Major Centre	93	2,540	4,710	3,170
Walworth Road Major Centre	273	9,080	17,980	6,980
London Bridge District Centre	94	2,080	1,520	6,590
Bankside/Borough District Centre	147	3,838	1,450	9,790
Lordship Lane District Centre	156	3,630	6,680	5,020
Camberwell District Centre	192	5,690	5,680	6,410
Herne Hill District Centre	107	1,100	3,000	2,900
The Blue Local Centre	80	2,740	1,715	1,500
Dulwich Village Local Centre	32	500	1,600	886
Nunhead Local Centre	62	1,100	2,100	867
Tower Bridge (undesigned)	63	1,080	640	1,360
Old Kent Road (undesigned)	35	11,800	19,800	2,000
Food stores outside centres	15	16,000	n/a	n/a
Total	1,867	92,958	115,708	61,793

128. The Southwark Retail Study (2015) provides details of the existing shopping provision in Southwark and includes up to date health checks of the shopping centres, describing the vitality and viability of the borough's centres in terms of their retail performance.

Peckham

129. Peckham town centre is the largest shopping and commercial centre in the London Borough of Southwark, in terms of number of outlets and the amount of retail floorspace. The London Plan and the New Southwark Plan identify Peckham as a major town centre in the town centre network. The boundary and designation of the town centre remains relatively unchanged since the Core Strategy however there has been a small extension proposed through the New Southwark Plan preparation to incorporate shops just outside of the town centre boundary. It is also part of the Camberwell and Peckham Creative Enterprise Zone. In Creative Enterprise Zones it is important to safeguard capacity for light industrial, maker space and culture oriented creative production uses.
130. There are three site allocations located within Peckham Major Town centre including the redevelopment of the Aylesham shopping centre in the centre of the town. Together with the Blackpool Road site allocation (NSP72) just outside of the town centre, the site allocations in the Peckham vision area will deliver 1,370 homes, 7,000sqm retail, leisure and community floorspace and 15,300sqm employment floorspace (net).
131. Its key roles include convenience shopping, comparison shopping, services, entertainment and community facilities. Peckham has a large number of small independent convenience retailers located throughout the centre. The centre also accommodates a significant number of market stalls located along Rye Lane, Atwell Road, Blenheim Grove, Choumert Road and Highshore Road.
132. The proportion of convenience retailers located in and around the Peckham Major Town centre is significantly higher than the UK average.
133. There is also a high percentage of hot food takeaways and betting shops combined, 26%, when compared to the UK average, 19.2%.
134. Peckham town centres has a variety of non-retail services uses. The centre has a very high proportion of hairdressers and beauty parlours, 37.5% compared to a UK average of 22.9%, when surveyed in 2013.
135. Significantly, in 2014 Peckham Town centre had a high percentage of shops E(a) Use Class, 70.8%, and a low vacancy rate of 9.7%.
136. Data from a survey of shops within designated protected shopping frontages, provides a useful picture of the mixture of uses in 2020 (although not directly comparable).
137. It demonstrated that Peckham's town centre had 169 units in its SF1 primary shopping frontage and had a vacancy rate at 8.9%. Within its

SF30 secondary frontage, it had 246 units and had the vacancy rate of 15.9%.

Peckham Major Town Centre	
% of E	77%
% of E(a) – Retail shops	57%
Vacancy	13%
% of Sui Generis – Hot Food Takeaway	4%

138. There has been a reduction in the proportion of shops E(a) in Peckham Major Town Centre and an increase in the number of vacant shops.

Elephant and Castle (including Walworth Road)

139. Elephant and Castle is a major town centre, part of the Central Activities Zone, Elephant and Castle Cultural Quarter and the Elephant and Castle Opportunity Area. There are 10 site allocations in the Elephant and Castle and Walworth town centre areas, including redevelopment of the Elephant and Castle shopping centre and London College of Communication campus (now granted consent) along with a range of other site allocations. Sites in the Elephant and Castle Vision Area including completion of the Elephant Park scheme and individual planning applications will deliver 2,315 homes, over 8,000sqm retail, leisure and community uses and 85,000sqm employment uses (net).
140. Most shop units were located within the Elephant and Castle Shopping Centre, prior to its redevelopment.
141. The proportion of A3/A5 service units is higher than the UK average. The vacancy rate of this centre is low at 4.3%, indicating a healthy, vital and viable centre.
142. Walworth Road is designated as a major centre along with Elephant and Castle. Extensions have been proposed to the Elephant and Castle major town centre boundary throughout the preparation of the NSP. This was to incorporate additional shopping areas to the south of East Street, southern part of Walworth Road and part of Westmoreland Road, which was also proposed to be part of the secondary protected shopping frontage SF23. The road has a good range of convenience and comparison shopping including: a Morrisons Supermarket, two Tesco Express stores, Iceland and an M&S food hall, a range of independent stores, pubs and community facilities.
143. There has been a decline of 30 units since 2009 and the proportion of former A1 uses was lower than the national average.

144. The Walworth Road has a strong selection of comparison shops, a reasonable range of service uses reflecting the size of Walworth Road and its service role in the shopping hierarchy. Nevertheless, the proportion of restaurants and cafes is below the average, and the proportion of hot food takeaways is slightly above.
145. Data from a survey of shops within designated protected shopping frontages, provides a useful picture of the mixture of uses in 2020 (although not directly comparable).

Elephant & Castle (including Walworth Road) Town Centre	
% of E	79%
% of E(a) – Retail shops	59%
Vacancy	7%
% of Sui Generis – Hot Food Takeaway	8%

Canada Water

146. Canada Water is one of Southwark's three major town centres and is also part of the Canada Water Opportunity Area designated in the London Plan. The boundary and designation of the town centre remains relatively unchanged since the Core Strategy however there has been a small extension proposed through the New Southwark Plan preparation to incorporate shops just outside of the town centre boundary.
147. There are two major site allocations in the town centre which will transform the area. NSP78 includes a large site allocation which has been granted planning permission for the Canada Water masterplan. There are also strategic sites allocated outside of the town centre but within the Opportunity Area. Together the site allocations in the vision area will deliver 4,712 new homes, 10,000sqm retail, leisure and community uses and 22,200sqm employment space (net). The masterplan is based on an outline permission and there is the potential for significantly more housing, office, retail, community and leisure floorspace within the parameters of the outline permission.
148. Uses within this town centre broadly reflect the national average, although with a significantly higher proportion of restaurants and hot food takeaways. The vacancy rate is also significantly smaller than the national average, which is again indicative of town centre vitality and viability.

149. This centre has a good selection of comparison shops, however a low proportion of clothing and footwear stores, 17%, when compared to the national average, 25%. In the New Southwark Plan: Interim Consultation Report Responses, some respondents noted that the retail offer lacked diversity in its offer.
150. Data from a survey of shops within designated protected shopping frontages, provides a useful picture of the mixture of uses in 2020 (although not directly comparable).

Canada Water Major Town Centre	
% of E	64%
% of E(a) – Retail shops	34%
Vacancy	10%
% of Sui Generis – Hot Food Takeaway	10%

London Bridge

151. London Bridge is designated as a District Centre and includes CAZ frontages. The NSP proposes an extension to the town centre to incorporate Bermondsey Street and part of Tower Bridge Road. These areas include cultural, retail, night time economy, office and workspace uses. It is part of the CAZ and the Borough, Bankside and London Bridge Opportunity Area. There are 4 site allocations in the London Bridge town centre and vision area which will deliver 483 homes, 1,500sqm retail, community and leisure uses and 43,100sqm employment uses (net).
152. The centre's mix of units is focused on the convenience, food and drink sector. The vacancy rate is lower than the national average.
153. The proportion of restaurants and cafes and pubs and bars is much higher than the national average. The proportion of hairdressers/beauty parlours and banks/other financial services is significantly below the national average. This is indicative of its service role in Central London.
154. Data from a survey of shops within designated protected shopping frontages, provides a useful picture of the mixture of uses in 2020 (although not directly comparable).

London Bridge District Town Centre	
% of E	94%
% of E(a) – Retail shops	39%
Vacancy	3%

% of Sui Generis – Hot Food Takeaway	1%
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Old Kent Road North and South

155. The Old Kent Road is the dominant destination for comparison shopping in the borough however previously was not designated as a town centre. The London Plan designates Old Kent Road as an Opportunity Area ('OA') and the NSP proposes two district town centres within the OA. The Opportunity Area will deliver 20,000 new homes, a new high street replacing big box retail type development and car parks, and industrial co-location and offices delivering 46,500sqm employment uses (net). The Old Kent Road Business Survey (SP421, We Made That, 2019) identifies that the area contains 75,000sqm retail floorspace, employing around 700 people and a 13% vacancy rate of retail units.
156. This compares to 2018 figures of around 10,000 m² of vacant floorspace (11%), which is comparable to the national average. However, along some designated protected shopping frontages along the Old Kent Road, the vacancy rate is as high as 29%.
157. Based on Valuation Office/Completely Retail data, the total occupied Class A1 to A5 floorspace at OKR totals about 64,500 m² GIA split:
- Class A1 retail, 45,300 m² (GIA)
 - Class A1 service/A2, 6,500 m² (GIA)
 - Class A3 to A5 = 10,000 m² (GIA)
158. Data from a survey of shops within designated protected shopping frontages, provides a useful picture of the mixture of uses in 2020 (although not directly comparable).

Old Kent Road North and South District Town Centres	
% of E	65%
% of E(a) – Retail shops	39%
Vacancy	19%
% of Sui Generis – Hot Food Takeaway	9%

Bankside and the Borough

159. Bankside and the Borough is designated a District Centre and is designated CAZ frontage in the London Plan. The town centre is located in the CAZ, in the Borough, Bankside and London Bridge Opportunity Area and is part of the South Bank Cultural Quarter. There are 14 site allocations in the NSP vision area which will deliver 1,022 homes,

9,500sqm retail, community and leisure uses and 61,000sqm employment space (net).

160. This centre has a high proportion of units in the convenience retail and food and drink sectors. The Southwark Retail Study 2015 suggests this reflects its role as a CAZ frontage, which serves as a Central London service centre. The centre has a low proportion of comparison retail and a low vacancy rate. The proportion of restaurants and cafes and pubs and bars is far higher than the UK average.
161. Data from a survey of shops within designated protected shopping frontages, provides a useful picture of the mixture of uses in 2020 (although not directly comparable).

Bankside and the Borough District Town Centre	
% of E	74%
% of E(a) – Retail shops	23%
Vacancy	8%
% of Sui Generis – Hot Food Takeaway	10%

Lordship Lane

162. Lordship Lane is designated as a District Centre in the New Southwark Plan, it has a role primarily serving local residents.
163. This centre has a higher proportion of convenience retail to the national average, but with a mix of units generally like the national average. This centre has a low vacancy rate.
164. The centre is mainly comprised of independent retailers with a small selection of national multiple retailers. The proportion of restaurants and cafes is higher than the national average.
165. The New Southwark Plan: Interim Consultation Report Responses highlighted that respondents were satisfied with the variety of retail uses, independent ownership of businesses and high-quality urban design and heritage.
166. Data from a survey of shops within designated protected shopping frontages, provides a useful picture of the mixture of uses in 2020 (although not directly comparable).

Lordship Lane District Town Centre	
% of E	79%

% of E(a) – Retail shops	50%
Vacancy	8%
% of Sui Generis – Hot Food Takeaway	5%

Camberwell

167. Camberwell is designated as a District Centre in the New Southwark Plan. It is also part of the Camberwell and Peckham Creative Enterprise Zone. In Creative Enterprise Zones it is important to safeguard capacity for light industrial, maker space and culture oriented creative production uses. The town centre is proposed to be extended in the NSP to incorporate site allocations around the existing bus garages and Camberwell station site to take into account the significant town centre development opportunities. The Camberwell town centre contains 7 site allocations and there are additional sites within the NSP Camberwell vision area. In total these will deliver 1,765 homes, 7,700sqm retail, community and leisure uses and 2,200sqm employment uses (net).
168. The retail centre is comprised of a mix of building styles, ranging from traditional terrace period building typical of a London High Street to more modern infill development.
169. The diversity of uses present in the centre in terms of the number of units is set out in Table H.1, compared against the national average.
170. The proportion of comparison retail, 23.4%, is significantly below the UK average, 36%. The proportion of convenience, 11.5%, and food and drink uses, 26%, are well above the national average, 17.6%. The proportion of restaurants and cafes is higher than the national average, as is the number of hairdressers/beauty parlours and laundries/dry cleaner.
171. Camberwell has a low vacancy rate, 7.8%, much like the other centres in Southwark.
172. Data from a survey of shops within designated protected shopping frontages, provides a useful picture of the mixture of uses in 2020 (although not directly comparable).

Camberwell District Town Centre	
% of E	73%
% of E(a) – Retail shops	43%
Vacancy	10%
% of Sui Generis – Hot Food Takeaway	9%

Herne Hill

173. Herne Hill district centre is situated between Southwark and Lambeth, the main concentration of retail units are located on Half Moon Lane in Southwark, although there are a number of commercial units by the railway station and on Railton Road, within Lambeth. There is potential for town centre and housing development at the Bath Trading Estate (NSP48).
174. Herne Hill District Centre has a relatively small selection of comparison shops. Most businesses are small independents, with a small selection of multiple retailers like Londis and Oxfam present. The centre also has a successful street market.
175. The proportion of restaurants and cafes, 51.1%, is much higher than the national average, 23.3%, as is the number of hairdressers/beauty parlours, laundries/dry cleaners and estate agents.
176. Much like most centres in Southwark, Herne Hill centre's vacancy rate is lower than the UK average.
177. Data from a survey of shops within designated protected shopping frontages, provides a useful picture of the mixture of uses in 2020 (although not directly comparable).

Herne Hill District Town Centre	
% of E	89%
% of E(a) – Retail shops	51%
Vacancy	0%
% of Sui Generis – Hot Food Takeaway	4%

The Local Centres

178. The Blue forms a linear high street with a 'market place' at the centre. The centre has a limited number of multiple retailers and mainly fulfils a local shopping role. The vacancy of this rate of this centre, 11.3%, is broadly the same as the UK average, 12.1%. Respondents to the NSP: Interim consultation report noted that there were too many pawnbrokers and similar uses as well as takeaways.
179. Data from a survey of shops within designated protected shopping frontages, provides a useful picture of the mixture of uses in 2020 (although not directly comparable).

The Blue Local Town Centre	
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% of E	74%
% of E(a) – Retail shops	50%
Vacancy	4%
% of Sui Generis – Hot Food Takeaway	5%

180. Dulwich Village Local Centre is situated in the south of the borough. The centre has a limited number of multiple retailers and mainly fulfils a local shopping role, with the majority of businesses as small independents. The vacancy rate of this centre is significantly below the national average at 3.1% against 12.1%.

181. Data from a survey of shops within designated protected shopping frontages, provides a useful picture of the mixture of uses in 2020 (although not directly comparable).

Dulwich Village Local Town Centre	
% of E	88%
% of E(a) – Retail shops	51%
Vacancy	0%
% of Sui Generis – Hot Food Takeaway	0%

182. Nunhead Local Centre is made up of two sections, running along Evelina Road from the railway line south to Nunhead Green. It was extended as part of the NSP consultation to incorporate the shopping and community uses around Nunhead Green. There are no site allocations in Nunhead, the centre serves a local function. The centre has a limited number of multiple retailers and mainly fulfils a local shopping role. Significantly, the vacancy rate of this centre is double the national average at 24.2% of 12.1%. The retail study suggests this indicates that this centre is struggling to attract new retailers. The proportion of fast food takeaways, 39.1%, is much higher than the UK average, 15.2%.

183. Data from a survey of shops within designated protected shopping frontages, provides a useful picture of the mixture of uses in 2020 (although not directly comparable).

Nunhead Local Town Centre	
% of E	55%
% of E(a) – Retail shops	43%
Vacancy	12%
% of Sui Generis – Hot Food Takeaway	15%

184. Tower Bridge Road is designated as a new Local Centre in the New Southwark Plan. The proportion of comparison retail is significantly below the national average figure. This reflects its role as a centre serving a local population. The proportion of convenience, food and drink and A1 service uses are above the UK average.
185. Data from a survey of shops within designated protected shopping frontages, provides a useful picture of the mixture of uses in 2020 (although not directly comparable).

Tower Bridge Local Town Centre	
% of E	73%
% of E(a) – Retail shops	41%
Vacancy	10%
% of Sui Generis – Hot Food Takeaway	4%

Protected Shopping Frontages

186. Policy P36 Protected Shopping Frontages aims to ensure that the vitality and viability of our key shopping areas is maintained. In the proposed modifications to the New Southwark Plan, this has been achieved through ensuring development provides active ground floor uses which provide a service to the general public, that would not harm the vitality and viability of the shopping frontage.
187. Prior to the changes to the Use Classes Order, this policy aimed to ensure that the percentage of shop units (E(a) use class and previously A1) within protected shopping frontages did not fall below a particular threshold.
188. The approach sought a more tailored approach to the protection of A1 units (as referred to at the time) through designating primary and secondary shopping frontages, an approach recommended in the evidence base, the Southwark Retail Study 2015.
189. The retail study suggested that the approach of designating primary and secondary shopping frontages would help maintain a high proportion of A1 uses in the main town centre frontages, whilst also allowing greater diversification in the wider town centre. For example, this approach was adopted in Peckham, where the primary shopping frontage (SF1) has an A1 use threshold of 75% and the secondary frontage has 50%.
190. Primary frontages were likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. In

secondary shopping frontages and the Central Activities Zone (CAZ), whilst shops are important, there was greater flexibility allowed for in the diversity of activities and services such as restaurants, cinemas and businesses. Maintaining a healthy balance of uses in these locations is vital to protecting the vitality and viability of our centres. Secondary shopping frontages inside town centres, still form a crucial part of the local economy and retail environment.

191. Comparisons of the Councils shopping frontage surveys in 2015, 2017 and 2018 highlight a consistent trend of loss of convenience and comparison retail units in designated shopping frontages. The table below indicates, the loss of shops A1/E(a) use class between 2017 and 2018 highlighted in red are where there have been reductions in the percentage of A1/E(a) shops.

NSP Schedule ID	Name	Years	
		2018 % of A1 / E(a) shops	2017 % of A1/ E(a) shops
SF1	Peckham	73%	82%
SF2	Walworth Road	60%	75%
SF3	Camberwell	47%	64%
SF4	Lordship Lane	49%	53%
SF5	The Blue	51%	94%
SF6	Hopton Street	40%	39%
SF7	The Cut	38%	39%
SF8	Borough High Street	13%	39%
SF9	Waterloo Road	33%	39%
SF10	Great Suffolk Street	53%	39%
SF11	Snowsfields and Weston Street	39%	38%
SF12	Colechurch House	67%	38%
SF13	Hay's Galleria	44%	38%
SF14	Tooley Street	33%	38%
SF15	Bermondsey Street	27%	38%
SF16	Dockhead	50%	50%
SF17	Jamaica Road	54%	85%
SF18	Jamaica Road	43%	44%
SF19	Albion Street	50%	46%
SF20	Harper Road	50%	58%
SF21	Tower Bridge Road	41%	55%
SF22	Lower Road and Plough Way	35%	43%
SF23	Walworth Road, East Street and	58%	73%

	Camberwell Road		
SF24	Old Kent Road, East Street and Dunton Road	40%	52%
SF25	Ilderton Road	55%	45%
SF26	Maddock Way	63%	78%
SF27	Peckham Park Road and Old Kent Road	35%	50%
SF28	Camberwell	36%	63%
SF29	Vestry Road	75%	45%
SF30	Peckham	48%	63%
SF31	Queens Road	29%	50%
SF32	Bellenden Road	59%	55%
SF33	Gibbon Road	33%	33%
SF34	Evelina Road, Nunhead Green and Kirkwood Road	47%	63%
SF35	Grove Vale	54%	63%
SF36	East Dulwich Road	38%	43%
SF37	Crosswaithe Avenue	100%	100%
SF38	Lordship Lane	50%	67%
SF39	North Cross Road	52%	71%
SF40	Herne Hill	57%	25%
SF41	Half Moon Lane	59%	67%
SF42	Norwood Road	48%	67%
SF43	Dulwich Village and Calton Avenue	62%	59%
SF44	Dulwich Village	35%	47%
SF45	Lordship Lane	57%	40%
SF46	Forest Hill Road	45%	65%
SF47	Forest Hill Road	29%	48%
SF48	Lordship Lane	58%	39%
SF49	Croxted Road and Park Hall Road	58%	58%
SF50	Seeley Drive	70%	75%
SF51	Nunhead Grove and Nunhead Lane	43%	70%
SF52	Camberwell New Road	19%	43%

192. A comparison of protected shopping frontages surveyed in 2017 and 2018 highlights a consistent trend that in two-thirds of designated shopping frontages the percentage of A1 use class has declined. Shopping frontages located in many of the key town centres of Southwark. For example, Peckham has decreased from 82% to 73%; Walworth Road has decreased from 75% to 60%; Lordship Lane 53% to 49%; and The Blue has gone from 94% to 51%. (It is important to recognise that minor changes to the specific extents of the frontages have been made in a few instances and caution must be applied with direct comparison between the two years).

193. The introduction of the new Use Class E provided a blanket flexibility across town centre areas, with the intention of supporting the recovery of town centres and high streets across England and Wales. The approach, as set out above is no longer possible as a change of use between E sub-classes is no longer classed as 'development', and therefore does not require planning permission.
194. The Table below illustrates how each town centre is comprised of several key shopping areas (designated as protected shopping frontages).

Designation	Town Centre	Key Shopping Area
Major	Elephant and Castle (including Walworth Road)	SF2
		SF20
		SF23
	Peckham	SF1
		SF30
	Canda Water	SF22
District	Bankside and The Borough	SF6
		SF7
		SF8
		SF9
		SF10
	London Bridge	SF11
		SF12
		SF13
		SF14
		SF15
	Camberwell	SF3
		SF28
	Lordship Lane	SF4
		SF38
		SF39
		SF48
	Herne Hill	SF41
		SF42
	Old Kent Road north	SF24
	Old Kent Road south	SF27
Local	The Blue	SF5

	Dulwich Village	SF43
		SF44
	Nunhead	SF33
		SF34
		SF51
	Tower Bridge Road	SF21

Rationale for Article 4 Directions in Town Centres

195. The proposed Article 4's will cover the full extents of each of Southwark's designated Town Centres, and remove the rights granted by Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (GPDO) Order 2015 (as amended) for changes of use from Commercial, Business and Leisure (Class E) to a dwellinghouse (Class C3) and demolition of commercial buildings and replacement with residential buildings (Class ZA).
196. The proposed Article 4 directions are necessary to ensure that our approach to retail provision, town centres and high streets, as set out in the New Southwark Plan and London Plan are deliverable.
197. Regionally, The London Plan Policy SD9 Town centres: Local partnerships and implementation states that "Boroughs should [...] introduce targeted Article 4 Directions where appropriate and justified to remove permitted development rights for office, light industrial and retail to residential in order to sustain town centre vitality and viability and to maintain flexibility for more comprehensive approaches to town centre housing and mixed-use intensification". Further evidence supporting this is set out in the Mayor of London's "Strategic evidence to support London borough Article 4 Directions (commercial to residential)" (Appendix D).
198. Locally, the NSP defines Southwark's town centre network and hierarchy in accordance with the NPPF and the London Plan's Town Centre Network, of which Elephant and Castle, Peckham and Canada Water are designated as Major Town Centres. The Retail study conducted a town centre audit, providing an analysis of the main town centres throughout the borough. The audit informed the designation of Southwark's town centre network and protected shopping frontages.
199. The strategy aims to improve the retail offer in our existing centres and to encourage all new major development for shopping and leisure uses to be located in the town centres as set out in the retail hierarchy. The strategy will seek to support an increase in the comparison and convenience goods floorspace throughout the borough and particularly within the Elephant and Castle, Canada Water, and Peckham Major Town centres.

This will ensure we are able to deliver the quantitative capacity for retail growth.

200. The NSP ensures there are sufficient allocations/capacity to meet the identified retail need, and according to the town centre network and hierarchy. Table 1B supporting Policy SP1b (see EIP82b) demonstrates how retail, leisure and community floorspace is expected to change based on site allocation capacity estimates in each Vision Area, with the overall expected capacity for retail, leisure and community floorspace is 81,501sqm (net). This figure uses the minimum expected capacity in the Canada Water masterplan. There is scope for additional retail, leisure and community uses in the Canada Water masterplan outline planning application if a higher range is accommodated between the minimum and maximum floorspace estimations.
201. The permitted development right for change of use from Commercial, Business and Leisure (Class E) to a dwellinghouse (Class C3) will have a negative impact on town centre vitality and viability. Through the loss of:
 - Retail
 - Offices and other employment floorspace
 - Health services and other social infrastructure
202. The continued vitality and viability of Southwark's centres and shopping parades depends, in part, on the range and critical mass of retail services on offer being maintained. The town centre first approach acknowledges that comparison retail is the core driver of growth within many of Southwark's town centres, and accordingly prioritises the protection of the core retail function, E(a) use, whilst also supporting the retention and uplift of other commercial, business and services use classes where there is an identified capacity.
203. The permitted development rights would affect how local planning authorities monitor the delivery and quantum of retail, employment and social infrastructure, against local evidence of current need and future demand. The introduction of this new permitted development right would inhibit a planning system which is genuinely plan-led, as set out in paragraph 15 of the NPPF.
204. The NSP, designates key shopping areas throughout the borough which form the heart of local communities, providing access to a range of shops and services, employment opportunities, culture and social contact, and information and support. As set out above, these areas are set out as protected shopping frontages, where the initial aim of this policy was to ensure their main function as retail spaces. Due to the changes to the Use Classes Order, the policy now seeks to ensure units in key shopping areas provide active frontages, in order to animate the street, encourage footfall and support the local economy.

205. The right would reduce the active frontages in town centres, high streets and key employment locations. Significant stretches of inactive frontages (with aesthetically incongruous former shop fronts) will undermine their long-term sustainability, vitality and viability, and diminish the ability of the local planning authority to ensure quality place-making. The reduction in active ground floor uses, would have a negative impact on the public realm, footfall and economic renewal.
206. Town Centre boundaries have been tightly formed around key shopping areas and site allocations; this is demonstrated by the maps in Appendix B. The implementation of policies relating to both the site allocations and the protected shopping frontages is crucial to the NSP's retail strategy, and to ensure a genuinely plan-led approach. The loss of commercial floorspace in these areas, would threaten the ability of these site to provide long-term growth in retail and leisure up to 2036, as required through the evidence base and associated strategy.
207. As such, it is appropriate to propose Article 4's which incorporate the full extents of the Town Centres in the borough, as this would demonstrate a targeted approach to the application of Article 4's due to their compact boundaries, formed around site allocations and key shopping areas – which will play a fundamental role supporting the local economy and Southwark's diverse places. The council recognises and support town centre intensification but the PDRs would create ad hoc change. By applying town centre planning policies and site allocation policies this would enable the council to actively manage the change for the positive benefit of a town centre wide approach to its shopping frontages and site allocations.

SECONDARY SHOPPING FRONTAGES OUTSIDE TOWN CENTRES

208. There are 19 designated Secondary Protected Shopping Frontages located outside of town centre designations and the Central Activities Zone. These local shops and other local services provide an invaluable service to residents in meeting their daily needs. The Council proposes that the Secondary Protected Shopping frontages be included in an Article 4 Direction to protect change of use from Class E to residential for multiple reasons which are detailed in the following sections.
209. The table below shows the designated Secondary shopping frontages outside of town centres and the CAZ with the percentage vacancy and actual number of units which are vacant (Protected Shopping Frontages Survey, 2020). Although the percentage of vacancy looks relatively high, this is due to the low number of total units within the parade. The table details the actual number of vacant units, demonstrating that there is relatively low vacancy within these secondary frontages. Many of these

secondary frontages have 0 vacant units. In total, the percentage of vacant units in Secondary Protected Shopping frontages outside of town centres is only 9.79 per cent. The purpose of the PDR right is to prevent long term vacancy in shopping areas. The low vacancy data shows that these parades are in active use by the local community

Designated Secondary Protected Shopping Frontages and vacancy rates outside of Town centres (Protected Shopping Frontages Survey, 2020)

Key Shopping Area	Address	No. of Shops	% vacancy	No of vacant units
SF16	Dockhead 23-41	10	10	1
SF17	125 - 151 Jamaica Road	13	0	0
SF18	142 - 145, 156 - 250 Jamaica Road	35	2.86	1
SF19	20-52 Albion Street	14	0	0
SF20	16-42 Harper Road	12	33.33	4
SF25	Ilderton Road	11	0	0
SF26	Maddock Way 1-14	8	0	0
SF29	76-88 Vestry Road	4	0	0
SF36	34-60 (even) East Dulwich Road	13	7.69	1
SF37	6-20 (even) Crossthwaite Avenue	6	0	0
SF45	383-401 Lordship lane and 351-379 Lordship Lane	30	10	3
SF46	2-46 Forest Hill Road	21	14.29	3
SF47	92-126 Forest Hill Road	18	20	3
SF49	80-96 Park Hall Road and 2-12 Croxted Road	12	16.66	2
SF50	Seeley Drive 30-41	10	10	1
SF53	125-181 Southampton Way and 156-160 Southampton Way	17	0	0
SF54	201 -227 Camberwell Road	11	0	0
SF55	211-239 East Street	13	15.38	5
SF56	108-181 Camberwell Road and 157-179 Camberwell Road	28	17.86	5
Total		286	9.79	28

210. The Southwark Retail Study 2015 – undertaken by Nathaniel Lichfield & Partner's (NLP) - points to the even distribution of protected shopping frontages across the borough in helping to ensure a high level of accessibility to local shopping facilities for most residents. The report recommends that in order to maintain high levels of accessibility across the borough, all protected shopping frontages should be retained, even if the number of shops and services falls below 10 units. Based on NLP's experience across London, local parades of around 5 shop units can also fulfil an important shopping function.

211. The table shows that the number of shops in each frontage rarely falls below 10 units and it never falls below 5 units, thus demonstrating that Southwark's Secondary Shopping Frontages are still playing an important role in the shopping needs of local communities consistent with NLP's recommendation in the Southwark Retail Study 2015. The loss of these frontages to residential uses through PDR would remove this accessibility.
212. Throughout public consultation on the New Southwark Plan we have received numerous requests to designate more local parades outside of town centres. In 2019, four new secondary shopping frontages were designated at the request of residents and local groups:
- SF53 - 125-181 Southampton Way and 156-160 Southampton Way
 - SF54 - 201 -227 Camberwell Road
 - SF55 - 211-239 East Street
 - SF56 - 108-181 Camberwell Road and 157-179 Camberwell Road
213. This highlights the desire within the local community for shopping parades to remain in commercial use and their significance in serving local residents. Permitted development rights allowing the change of use from Class E to residential would erode the quality and offering of these shopping parades which are clearly valued by the community.
214. As set out above, in response to the changes to the Use Classes Order (September 2020) which introduced a blanket Class E for Commercial and business services, the Council proposed a modification to New Southwark Plan Policy P36: Protected shopping frontages. This policy was amended deliberately to provide protection from changes of use to residential uses in local parades and thus ensuring that they are able to continue providing a service to the general public. The removal of Permitted development rights from Class E to residential in secondary protected shopping frontages would maintain the integrity of this policy.
215. The importance of local shops and services has been particularly highlighted over the last 18 months as the COVID-19 pandemic has meant that people are unable to travel and have relied on the services closest to them. One of the more notable positive impacts of COVID-19 has been that more people have used their local shops and services, which has boosted the relative health of smaller centres and local parades.
216. The map below shows the geographic distribution of Southwark's Secondary Protected Shopping Frontages. In a pre- and post-pandemic world, local accessibility of shops and services is important for the elderly, the disabled, those who are pregnant or with young children, and those that cannot afford to travel to other centres to reach the goods and services they require.

217. The NPPF suggests that Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses. The schedule below demonstrates the mix of offerings provided by the Secondary Protected Shopping Frontages outside of town centres. The PDR to change from Class E to residential would limit the opportunity for diversity and create blank facades impacting on the character, safety and vitality of residential neighbourhoods.
218. In conclusion, the loss of retail in Protected Shopping Frontages outside of town centres would result in the loss of services vital to local communities and mean people would have to travel further distances to reach their needs. This conflicts with national objectives to promote sustainable living. It also raises equalities issues as the protected groups mentioned above would lose access to basic services. The inclusion of secondary shopping frontages outside of town centres within an Article 4 Direction means that accessibility to goods and services will remain evenly distributed across the borough and satisfy the preference of residents to have conveniently located neighbourhood parades.

SITE ALLOCATIONS OUTSIDE TOWN CENTRES

219. Outside of the town centres, Old Kent Road Opportunity Area and the CAZ, the council has designated 21 site allocations. These are important strategic sites over 0.25ha which have the potential for optimising the use of land, providing new homes and new commercial floorspace, or safeguarding existing uses such as important health facilities (now Class E). Most of these sites contain existing uses which would now fall within Use Class E. These include retail, office, health and light industrial uses. The site allocations outside of the town centres, Old Kent Road Opportunity Area and the CAZ which contain existing Class E uses have the potential to provide around 3,331 homes.
220. Sites outside of the town centres, Old Kent Road Opportunity Area and the CAZ also include 10 non-designated industrial sites outside town centres which are proposed as site allocations. Policy E7 of the London Plan only supports mixed use or residential development proposals on non-designated industrial sites where there is no reasonable prospect of the site being used for industrial purposes or the site has been allocated in a local development plan. The designation of these non-designated sites as site allocations gives further policy protection for securing future employment uses on the site. Policy P29 in the NSP requires the re-provision of employment floorspace on these sites which meets current market demand, and each site allocation contains bespoke policy relating to the requirements for non-residential uses that are expected. Prior approval applications on these sites would result in a net loss of industrial floorspace in the borough and the site allocation requirements and optimal use of the site not being realised.

221. The NSP contains a detailed schedule of existing uses on each site allocation and then sets out the site requirements in the site allocation policy. The site allocations have been updated to reference the new use classes and the proposed amendments to existing uses and site requirements are contained in EIP204. The estimated number of homes and floorspace capacity for non-residential uses has been quantified and referenced in Policy SP1b and Table 1B (see EIP82b for latest figures). Appendix 2 of the Site Allocations Methodology Paper (EIP82b) sets out the quantities of every site allocation.
222. In Old Kent Road, a detailed survey was undertaken of the Opportunity Area in 2015 and 2019 which updated and compared the baseline of existing uses on each site allocation (We Made That Old Kent Road Business Survey, SP421). This was then compared to the uses proposed in the masterplan and formed the baseline for understanding the net changes in industrial, employment, retail and community uses. The town centre boundaries are smaller than the overall Opportunity Area however the 18 site allocations in Old Kent Road form a comprehensive masterplan.
223. There are two examples within existing designated industrial land (now NSP site allocations outside of town centres) at St James' Road (Old Kent Road area) and Parkhouse Street (Camberwell) for which the council received prior approval applications for conversions to residential use. These applications undermine the ability to achieve re-provision of employment floorspace within comprehensive redevelopment schemes for which the council received prior approval applications for conversions to residential use and undermine the ability to achieve re-provision of employment floorspace within comprehensive redevelopment schemes for which the council is encouraging a range of mixed employment uses (including industrial).
224. The availability of permitted development rights can create a fallback position for developers. This is a particular risk for site allocations where the requirements of policy are watered down due to the fallback position of demolishing or converting a commercial building to residential use. If the permitted development right was implemented, this would also restrict the requirements of the site allocation policy being met, and could result in a poorer quality development which may not make optimal use of the site. This could result in less homes being provided overall, and would not result in any affordable housing being provided, of which there is an acute need.
225. The permitted development changes could also have an effect on the benchmark land value of the property when it comes to viability appraisals and this gives an alternative use value. Application of the permitted development right would undermine the council's ability to maximise affordable housing contributions. Firstly, any change of use to residential

made under the permitted development right would not be required to provide any affordable housing. Secondly, any change of use to residential will potentially increase the land value of the site. This would reduce the viability of any subsequent comprehensive redevelopment and would result in affordable housing obligations being reduced or unviable which would therefore affect Southwark's ability to meet its affordable housing targets.

226. The council has proposed to amend some economic and retail policies to include reference to the use of conditions in planning approvals so that particular uses that are planned for and would be meeting a strategic need in the borough could be secured (see EIP162). The council is already imposing conditions for example in the Old Kent Road Opportunity Area where light industrial uses are specifically designed for and then secured by condition in the planning approval. This is to meet the identified need and ensure the requirements of the masterplan for industrial co-location are met.
227. The risk with open Class E uses is that it is difficult for the council to plan for and monitor the delivery of the identified targets for retail, office and industrial uses especially where they may need to be specifically designed to target the identified end users. This risk can be managed for new applications where conditions can be applied and the council is able to work proactively to secure the right design criteria for identified uses (as required by site allocation policy, for example).

INDUSTRIAL LAND

NSP Target (Amended Policy SP4): Deliver 90,000sqm net additional employment floorspace between 2019-2036 outside the CAZ including hybrid, industrial and studio workspace

South Bermondsey industrial intensification (SPIL)

228. London Plan Policy E5 requires boroughs to define the detailed boundaries of SILs in policies maps having regard to the scope for intensification, co-location and substitution (as per Policy E7). Part 3 requires boroughs to explore opportunities to intensify and make more efficient use of land in SILs in development plan reviews and Opportunity Area Frameworks in collaboration with the GLA.
229. The latest draft of the Old Kent Road AAP (December 2020) sets out two options for the industrial intensification of Strategic Protected Industrial Land in South Bermondsey and includes a new masterplan for this approach. This is included in the background evidence EIP149 Old Kent Road Existing and Proposed (January 2021) and is based upon the masterplan by Maccreanor Lavington South Bermondsey Dive Under Masterplan (EIP145). If the minimum option for intensification was

achieved it would provide a net of 27,455 sqm in industrial floorspace. If the maximum option was delivered, 74,567 sqm of industrial floorspace would come forward (net).

230. The NSP proposes to retain 32 hectares of land as SPIL in Southwark and this is identified on the proposed policies map. This includes some additional designations on industrial sites that are not currently adopted SIL. Policy P28 makes clear in these areas only industrial uses would be permitted. The purpose of this is to ensure there are locations for industrial uses that would be non-compatible with residential uses to continue to function, which would particularly meet the requirement in London Plan Policy E4 regarding 24 hour servicing. London Plan Policy E4 (part G) also states that boroughs should ensure that the need to retain sufficient industrial and logistics capacity is not undermined by permitted development rights by introducing Article 4 Directions where appropriate.
231. In line with the intensification principles in Policy E7, the proposed masterplan for the South Bermondsey SPIL identifies a significant increase in industrial uses. Increasing industrial capacity in this location also allows for the potential relocation or growth of the industrial sector in purpose built stacked industrial buildings.
232. Permitted development rights in the retained industrial designations in Southwark could significantly undermine the effective planning of these sites. The change of use or demolition of industrial buildings in SPIL and replacement with residential uses would create amenity issues for new residents due to noise, dust, odours and heavy traffic movements. It would also undermine the ability of heavier industries typically located in designated SPIL to run their businesses. The co-location of industrial and residential uses needs careful design consideration which is planned for in the sites proposed for release from existing industrial designation.

Old Kent Road site allocations

233. In the Old Kent Road Opportunity Area, across 18 site allocations and industrial intensification in South Bermondsey we have planned for a net increase of 20,000 new homes, 128,000sqm employment uses and 3,000sqm community uses (EIP149). Due to the change in format of big box retail to high street format retail there would be a small overall net loss of retail floorspace however the dynamic of retail development along Old Kent Road will change significantly to benefit local residents and offer more choice.
234. The site allocations in Old Kent Road are planned to deliver 46,462sqm net uplift in employment floorspace. This will include industrial, hybrid or studio type workspace, as well as distribution and larger industrial units towards the NSP industrial floorspace increase target. The NSP Industrial

Background Paper demonstrates how we are planning for no net loss of industrial floorspace capacity across the Old Kent Road Opportunity Area where the majority of Southwark's industrial land is located.

235. Most of the site allocations are partially located in one of the two district town centres proposed for Old Kent Road in the New Southwark Plan, however some are located outside of the town centre boundary and in the wider opportunity area. The masterplan plans for a "bow-tie" strategy for employment development, encouraging the delivery of office and retail uses in the town centres close to the proposed Bakerloo Line stations, with larger scale distribution, warehouse and logistic uses mixed with residential towards the outer edges of the masterplan.
236. The Old Kent Road AAP requires bespoke design and policy requirements for industrial co-location and conditions are used to ensure light industrial uses are secured specifically (in the context of the Class E changes to the Use Classes Order).
237. Policy E4 of the London Plan requires that any release of industrial land to achieve wider planning objectives should be facilitated through the processes of industrial intensification, co-location and substitution as set out in Policy E7. Part E of Policy E4 requires any release of industrial capacity should be focused in locations that are well-connected and contribute to other planning priorities including housing, affordable housing, schools and infrastructure.
238. Policy E7 of the London Plan requires that the consolidation of designated industrial land to support the delivery of residential and other uses should be considered as part of a plan-led approach or as part of a coordinated masterplanning process in collaboration with the GLA and not through ad hoc planning applications.
239. Policy E6 requires boroughs to define the boundaries for LSIS sites and make it clear the range of industrial uses that are acceptable within that designation.
240. The NSP is in conformity with all of the policy requirements in E4-E7 and the aspirations for the Old Kent Road Opportunity Area (London Plan Policy SD1).
241. The NSP proposes to release some of the strategic SIL sites as formal industrial designations. This has been proposed in accordance with the principles in Policy E7 in respect of a plan-led and coordinated masterplanning process in collaboration with the GLA. The draft Old Kent Road AAP is successful in ensuring a plan-led approach to achieving a significant increase in homes as well as increased provision of employment and industrial floorspace including industrial co-location. Policy P29 also requires the successful integration of new homes and employment space to include a range of employment uses and that the

employment space must meet current market demand. The NSP site allocations for Old Kent Road make clear that development must respond positively to the objectives of the AAP, where there is significant design guidance. Evidence of market demand is included in the NSP evidence base studies, SP412, SP413, SP422 and SP431 which are used to inform discussions on the most appropriate types of employment floorspace that should be delivered or is identified on the relevant masterplan.

242. The NSP also designates 20ha of land as Locally Significant Industrial Sites (LSIS) on the proposed policies map in accordance with London Plan Policy E6. The relevant NSP site allocations NSP55, part of NSP63 and part of NSP67 all require industrial uses to be provided in the parts of the sites identified on the policies map as LSIS.
243. The masterplan shows ambitious levels of growth which could be achieved on the site allocations. The existing uses contain many existing office and industrial uses which includes Class E(g)(i) and (iii) office and light industrial uses. Individual buildings within the larger site allocations could therefore benefit from permitted development rights to residential. This would limit the Opportunity Area from achieving its full potential. The Old Kent Road has fragmented land ownership and smaller sites benefitting from PDR could undermine the delivery of the masterplan and would not fully optimise the use of the land. Furthermore this could limit the delivery of strategic infrastructure, undermine the case for the Bakerloo Line extension and may impede the delivery of important aspects of the masterplan, such as strategic parks and pocket parks.

RAILWAY ARCHES

Commercial opportunities

244. Policy P33 of the New Southwark Plan (Railway Arches) supports the development of commercial activities in railway arches. This will particularly help to bring vacant arches into use, promote active frontages and deliver the Low Line walking routes outlined within the NSP. There are over 800 railway arches in Southwark, providing significant opportunity for uplift in the delivery of different types of workspace, retail and community uses. Some of the railway arches in Bermondsey remain as Strategic Protected Industrial Land where industrial uses will be of priority. A [Low Line Horizon Study](#) was prepared for the Borough, Bankside and Bermondsey Area which identified 110,000sqm of floorspace in 390 arches in the north part of the borough with 70 units vacant (equating to potential growth in 12,000sqm of space). The study identified the size of railway arches range from 30sqm to 500sqm with the average size of a railway arch being around 180sqm. With 800 arches in the borough equating to around 144,000sqm of floorspace, and a vacancy rate assumed to be the same as the north of the borough at 12% this could potentially provide an additional 17,280sqm commercial floorspace

over the plan period and would contribute towards the employment targets identified in the NSP.

Risks of converting railway arches to residential

245. Policy P33 of the NSP (update included in EIP162 due to use classes changes) requires railway arches to provide commercial or community activities. No residential development will be permitted. For railway arches located in SPIL, industrial uses are required in railway arches. Railway arches also need to promote the delivery of the Low Line walking routes by providing active frontages and safe and accessible spaces for pedestrians. Railway arches that have already been converted in Southwark contain a mix of uses from offices, workshops, betting shops, retail units, bars and restaurants. The council therefore is proposing immediate Article 4 Directions to restrict any changes of use allowed by Class MA (Class E uses) to residential.
246. Converting railway arches to dwellings would result in negative impacts on residential amenity through restricted access to outdoor space, restricted access to natural light and fresh air, exposure to excessive noise and vibration from the railway, safety concerns and incompatibility with surrounding uses. It is therefore considered appropriate to implement immediate Article 4 Directions to remove certain permitted development rights which relate to changes of use of railway arches.
247. Many railway arches in Southwark are located within goods yards or located adjacent to busy roads, and noise mitigation for future occupiers would always be a priority concern for above passing trains.
248. There are clear problems associated with residential amenity for surrounding residents and future occupiers associated with the conversion of railway arches to dwellings. Railway arches have one principle elevation, with limited ability for the dwelling to receive an appropriate level of daylight and sunlight. Principle habitable rooms created inside the arch, such as bedrooms, may be windowless and receive no natural light, and the only windows that could be created on the principle elevation are potentially restricted by privacy issues. The lack of natural light in a dwelling could have implications for public health.
249. There will also be limited ability for new dwellings to provide any outside amenity space. Railway arches do not traditionally encompass any curtilage and land outside the railway arches would not lend itself to provide garden or external amenity space. For these reasons it is also unlikely any external car or cycle parking or bin storage would be able to be accommodated adjacent to dwellings in railway arches. Many arches are located within goods or storage yards, distribution centres, adjacent to highway land or on land to the rear of existing development. There are a number of access and safety concerns for future occupiers of dwellings created within the arches. In many cases vehicular access to the arches is

difficult, which has a negative impact for access for emergency vehicles. The arches are often located to the rear of existing development which results in an urban environment that faces away from the arches. As a result many routes to the arches are unlit, poorly integrated with existing urban development and may result in concerns of the safety of new residents.

250. Railway arches are also often located to the rear of existing residential properties, and are overlooked by gardens and back windows. There would therefore be further amenity considerations with regard to overlooking, privacy and security for both existing residents and future occupiers of railway arches.
251. The conversion of railway arches for use as residential dwellings would need a bespoke ventilation system to accommodate for the lack of windows and fresh air to the property. In order to safeguard future residents from poor ventilation, the council should ensure such bespoke systems are fully assessed and a planning condition requiring their use would be essential. This is not possible to achieve through the prior approval process for permitted development.
252. One of the major concerns for residential amenity arising from permitted development rights in railway arches is the impact of noise from passing trains on occupiers of potential dwellings beneath the lines. In many areas in Southwark, multiple lines pass over the arches, particularly on the north-south routes to London Bridge station. Therefore occupiers would be subject to regular train movements overhead, posing potential significant noise and vibration issues. Trains to and from London Bridge and the surrounding routes also carry trains operating throughout the daytime, late at night and early in the morning.
253. A noise report for development within railway arches (15/AP/4832) indicates that train passes would almost double the highest recommended target internal noise level for passing trains. This level is reported to still be audible but at a level that has not been found to cause disturbance to most people. However this target level is significantly higher than the guideline internal noise level for dwellings (between 30dBA at night and 35-40dBA in the daytime). Vibrations were also found to occur in all parts of the archway, most significantly occurring towards the highest part of the arch. Whilst there do exist methods of insulation and construction techniques which could reduce noise and vibration to a safer level, it is considered this would need to be of a significant quality and will be unlikely to reduce noise to guideline internal noise levels for the average dwelling. It is vital that the council assess noise mitigation techniques for proposed residential conversions in railway arches in order to determine whether it would be safe for future occupiers. It is considered a full planning application would be required to assess and provide conditions for noise mitigation in all cases of conversion.

254. As many railway arches are located within informal industrial areas, distribution centres or yards, it is considered there would frequently be an issue of compatibility with adjoining uses. The introduction of residential dwellings within working yards or industrial areas would have implications for compatibility in relation to heavy traffic movements, noise from adjoining uses, odours, pollutants and dust which are not suitable neighbouring activities for residential development. There would also be safety concerns for accessing dwellings within railway arches situated within working yards.
255. The conversion of railway arches to dwellings could also pose a domestic fire risk. This would be a significant risk to the rail network above which could result in damage to railway infrastructure, unprecedented train delays and potential risk to railway staff and passengers.
256. Whilst the conditions associated with a Prior Approval application require transport, noise and industrial processes to be assessed, it is unlikely that the council would consider any railway arches to be suitable for conversion to residential use and an immediate Article 4 direction is therefore justified.

POLICY AREAS THAT WOULD BE IMPACTED BY PDR

257. The following section includes information on important policy areas in the New Southwark Plan that would be undermined or undeliverable based on new PDR. These include policies on small shops, affordable workspace, business relocation and affordable housing delivery. The policies have recently been examined by independent Inspectors in the Examination in Public for the New Southwark Plan.

Small shops

258. To promote town centre viability and vitality, our approach to retail development aims to provide a diverse range of shop units, key social infrastructure, employment opportunities, and affordable space for small and independent businesses. This is in part, achieved through securing small shops as part of retail, use class E(a), development.
259. It has been evidenced that small shops play a crucial role ensuring the vitality and viability of our town centres, namely through meeting the anticipated needs for a diverse retail offer, supporting social infrastructure and providing affordable commercial space.
260. The Mayor of London's High Streets for All report recognises the important role of small shops and businesses in the provision of crucial social infrastructure and social services for London. The study states that shops often go beyond their primary commercial role and perform a social function, with 40% of small businesses interviewed for the study providing

some form of social function. The social function of small shops often supports marginalised communities and under-represented groups, for example, older people, jobseekers, young people and recent immigrants.

261. High streets are largely comprised of small businesses on leasehold arrangements; typical high street spatial configurations comprise of multiple small units under separate ownership, further complemented by a range of various spaces for work. This research concludes that this configuration supports the diversity (of which small shops play a crucial role) and ultimately the resilience on the high street.
262. Accordingly, high streets with small units (amongst others) provide a variety of employment opportunities, often supporting the employment of marginalised groups and highly educated people alike. The high street often can offer diverse tenure options to traders, and simultaneously create employment opportunities, often keeping money within the local economy.
263. Small shops provide a crucial role ensuring social inclusion, affordability, economic resilience, diversity of choice and character; however, they are facing a series of pressures which support the need for policy intervention.
264. The High Streets for All report explains that small businesses find rent unaffordable in high streets and town centres. As a centre becomes more successful and rents rise, small and independent businesses and small shops are priced out.
265. The London Town Centre Health Check shows that average retail rents across all centres grew by 3% per annum between the period 2005 and 2016. Notably, Peckham Town Centre is listed as one of the top 20 centres with highest growth in retail rents over the same period.
266. The GLA London Small Shops Study 2010 illustrates that there has been a decline in the number of local shops; referencing the British Council of Shopping Centres, “the number of businesses registered for VAT in the wholesale, retail and repair category has fallen from 434,000 in 1994 to 390,000 in 2005”. Furthermore, the study highlights that there has been a long-term trend towards large stores in centres, which is having a negative impact on small shops; this is supplemented with the rise of major superstore operators’ opening small food store formats.
267. To ensure the availability of small shops and affordable commercial space the NSP policy P31- Small Shops requires developments over 2,500 m² GIA or more of retail space to provide at least 10% of this space as small shops. The policy also requires the retention of small shops where existing small shops are at risk of displacement from a development. The policy requires the full consideration of the feasibility of providing affordable and suitable space for existing occupiers in the completed development. PDR could negatively impact on the availability of small

shops in the borough with the resulting impact of pushing up rents on existing stock, lessening the affordability of shops for small retailers.

Affordable workspace

268. London Plan 2020 Policy E2 supports the provision of lower cost workspace, flexible workspace for micro and SME businesses and supporting start ups. Policy E3 supports using planning obligations to secure affordable workspace at rents maintained below the market rate for specific sectors and purposes. Part C of the policy requires boroughs to consider detailed affordable workspace policies in light of local evidence of need and viability. The policy includes a number of definitions to explain the types of businesses affordable workspace is intended to support.
269. The Affordable Workspace Evidence of Needs in Southwark report 2019 (SP422) provides analysis of economic baseline data of micro and small enterprises and the need for affordable workspace in different parts of the borough. 96.2% Southwark businesses are micro and small enterprises with less than 50 employees. Economic change has had an impact on the supply and demand for employment space of all different types which has pushed up commercial rents and this has a disproportionate impact on micro and small businesses. To date the council has approved over 70,000sqm affordable workspace based on the requirements of the draft policy (10%). It is important to maintain current supply or ensure small and affordable business space is reprovided in redevelopment proposals otherwise the loss of additional small business space will further increase rental costs of light industrial premises or workshop space creating a detrimental impact on existing businesses. The NSP contains robust policies on the requirement for affordable workspace (P30) and business relocation (P32) which would not be applicable in any application for Prior Approval for the new Class E to residential permitted development right.

Housing Quality

270. Policy P14 in the New Southwark Plan and the Section 106 and CIL SPD (2015) requires certain standards to provide high quality residential homes. In exceptional circumstances where these standards cannot be met provisions are in place for financial contributions to help improve existing park spaces, playgrounds or public realm. Policy P14 requires standards relating to ceiling heights, dual aspect, private and communal amenity space, child play space and public open space (in Old Kent Road). The PDR include a limited number of conditions that would not encompass the full assessment criteria of the local plan policy. Sustainability standards set by the local plan, for example air quality neutral development and energy policies that help to address the climate emergency will not be required for new build developments under PDR (e.g. where demolition and new build residential is proposed under Class ZA).

Housing delivery

271. In the CAZ, the reprovision or uplift of employment floorspace is a 'must' requirement in the site allocations due to the priority of delivering office floorspace in the CAZ based on evidence of demand. Housing is a 'should' which encourages mixed use development where the reprovision or uplift of employment floorspace can be achieved. Our housing requirements are met through Site Allocations which 'must' provide housing. The council does not rely on site allocations which 'should' provide housing to meet its housing land supply targets. The five and fifteen land supply report shows our housing requirement over the 15 year period from 2020-2035 is 38,215 homes. The total capacity identified in the Five and Fifteen housing land supply is for 49,240 homes. We therefore exceed the requirement by 11,025 homes.
272. Large numbers of new homes are being delivered in Southwark through an effective planned approach to regeneration and even greater numbers will be deliverable in the future without the need to relax requirements on office to residential conversion. The council's Facts and Figures webpage sets out the strong delivery of homes since 2004. Nearly 10,000 net homes have been delivered over the last five years since 2015.
273. The GLA evidence points to the Mayor's London Plan, which sets out ambitious ten-year housing targets for every borough, alongside Opportunity Area plans for longer-term delivery where the potential for new homes is especially high. The London Plan strikes an appropriate balance between strategic housing and office needs, supported by the London Housing Strategy setting out how the Mayor of London will work with boroughs to deliver the step change in housing supply required. The London Plan and Housing Strategy support the delivery of housing within the CAZ such that it does not compromise the agglomerations of offices and other strategic functions.
274. As set out in the London Plan 2021 the minimum ten year target between 2019/20-2028/29 for Southwark is **23,550 net homes**. This is equivalent to **2,355 net homes per annum**, giving an accumulative total of **11,775 homes net additional homes** for the period 1 April 2020 – 31 March 2025. This is the 4th highest housing target set in London and therefore it represents a significant requirement.
275. Southwark has a sufficient supply of land to meet its five year housing requirement of **14,665 net homes** including a **20% buffer** brought forward from later in the plan period, with a surplus of **1,165 homes**.
276. Southwark also has a sufficient supply of land to meet its six to fifteen year housing target of **23,550 net homes**, with a surplus of **9,860 homes**.

277. Southwark is not reliant on Permitted Development Rights to achieve housing targets. We have reviewed past completions from the last seven years and there has been a low delivery rate of homes from Permitted Development from office to residential. On average 27 homes have been completed through Prior Approvals per annum, office to residential, as identified in the table below.

Prior Approvals from office to residential completions

Year	Completions of Prior Approval from office to residential
2013-2014	2
2014-2015	52
2015-2016	25
2016-2017	33
2017-2018	35
2018-2019	13
2019-2020	28
Total	188
Average per annum	27

278. There is an acute need for social rented and intermediate housing in the borough. New Southwark Plan policy P1 Social and Intermediate Housing will require all developments (including minor developments) to provide the maximum amount of affordable housing. Permitted development rights relating to the creation of residential units will not allow the council to secure much needed affordable housing contributions. This combined with the strong past delivery of homes in the borough would suggest that the council does not need PDR in order to increase housing delivery, particularly affordable housing delivery.

9. CONCLUSIONS

279. Article 4 Directions can be made if the council is satisfied that it is expedient that development should not be carried out unless planning permission is granted on application.
280. The use of an Article 4 Direction would not restrict development altogether, but instead ensure that development requires planning permission. Planning permissions including residential development would ensure the balance between office and residential uses is appropriate. They would ensure that new homes are of good quality with access to sufficient amenity space, play space, parking and social infrastructure. They would secure affordable housing, housing for people with specialist needs, family housing and contributions to strategic infrastructure. Where

required by planning policy, they will achieve an uplift or re-provision of the amount of employment floorspace on the site, including affordable workspace and support for existing businesses.

281. PD rights for change of use and demolition of commercial buildings have been introduced with the intention of making better use of vacant commercial buildings for housing. In Southwark's case, despite the pandemic, vacancy rates are lower than the national average and the evidence base supporting the recently adopted London Plan and the recently Examined New Southwark Plan show the projected need and demand for office, industrial, retail, leisure and community floorspace and the planned future growth for these uses in the CAZ, town centres, site allocations and industrial intensification areas. Railway arches are not suitable for residential homes due to safety and amenity concerns.
282. Whilst there is a recognition of the governments intent to reform the planning system, in part through the provision of greater flexibility, the recent changes to the Use Classes Order have gone a significant way in achieving this and the proposed new permitted development right will have a negative impact on town centre vitality and viability. In particular, through the loss of:
- Retail
 - Offices and other employment floorspace
 - Health services and other social infrastructure
283. This PD right may have the effect of reducing active frontages in town centres, high streets and key employment locations. Significant stretches of inactive frontages (with aesthetically incongruous former shop fronts) will undermine their long-term sustainability, vitality and viability, and diminish the ability of the council to ensure quality place-making. The reduction in active ground floor uses, would have a negative impact on the public realm, footfall and economic renewal.
284. The PDRs will create a loss of affordable housing delivery, and contributions to infrastructure and public services through S106 contributions. Through full planning applications, local planning authorities are able to secure affordable housing through S106 agreements with the developer which would serve as an obligation on the developer to either provide affordable housing on site, or an agreement to pay the local authority an agreed sum to fund the delivery of affordable housing elsewhere.
285. The PDRs would affect how local planning authorities monitor the delivery and quantum of retail, employment and social infrastructure, against local evidence of current need and future demand. The introduction of PDR would limit the ability of Southwark to achieve its targets outlined in the New Southwark Plan as existing stock could be converted to housing,

reducing the net uplift required in the borough as a whole, through the plan period to 2036. It will also reduce the availability of small, affordable commercial premises for shops, offices, workspaces and light industrial units.

286. The Article 4 Directions would prevent the unintended harm of commercial to residential permitted development rights on existing occupiers and their contribution to the character of the area, employment, the overall functioning of the CAZ, town centres, local shopping areas and industrial areas and the wider economy.
287. The council is satisfied that permitted development rights granted by Schedule 2, Part 3, Class MA and Schedule 2, Part 20, Class ZA would create wholly unacceptable adverse impacts in the areas proposed for the Article 4 Directions for the reasons set out in this report.

10. CONSULTATION

288. Consultation on the Article 4 Directions will comply with provisions set out in the GPDO. Notice of the Directions will be made by:

- Local advertisement in the press;
- Site notices placed in visible locations on principle streets in Southwark's CAZ, town centres, site allocations, industrial areas and railway arches;
- Notification to the Secretary of State.

289. The Town and Country Planning (General Permitted Development) Order 2015 (as amended) Schedule 3 Article 4 states that the local planning authority need not serve notice on an owner or occupier in accordance with sub-paragraph (1)(c), if they consider that –

- (a) individual service on that owner or occupier is impracticable because it is difficult to identify or locate that person or
- (b) the number of owners or occupiers within the area to which the direction relates makes individual service impracticable.

290. Due to the number of properties in the areas specified in the Article 4 Directions and the ongoing COVID-19 pandemic, the council considers it impracticable to serve notice on all properties individually. However the council will endeavour to make additional notification as follows:

291. Additional notification will be made by:

- Mail out to over 20,000 email addresses on the council's planning policy consultation notification mailing list;

- Mail out to business contacts and organisations including the five Business Improvement Districts;
 - Article 4 Direction council webpages updated with relevant information on the Direction, the representation period, the planning committee report and other supporting documents available to view and download; and
 - Online Consultation Hub Page providing information on the Directions and a portal for submitting representations.
292. Following consultation and within 6 months a report recommending whether the Directions should be confirmed will be reported back to Planning Committee.

11. COMMUNITY IMPACT STATEMENT

293. The council is working to improve the economic wellbeing of residents and to ensure that Southwark has a strong local economy with opportunities for employment, vibrant centres to do business in and residents equipped with skills and knowledge to access employment. The Article 4 Direction seeks to protect the contribution of offices to the local economy and economic wellbeing.
294. The equalities impact assessment (Appendix C) has concluded that the Article 4 Direction will have a positive impact on equalities and it will assist the council in implementing its planning policy framework, which has also undergone equalities analysis.

12. FINANCIAL IMPLICATIONS

295. Should the local authority refuse planning permission for development that otherwise would have been granted by Class MA and Class ZA in the locations outlined on the proposed immediate Article 4 Directions, the council's potential liability for compensation is limited to one year from the date the Direction is introduced. Any compensation may relate either to a depreciation in the value of land or buildings which results from failure to gain planning permission or to abortive expenditure. Therefore there is a risk that the proposed Directions will make the council liable to compensation claims. Because circumstances vary widely, it is not possible to gauge the magnitude of such claims.
296. The council has made immediate Article 4 Directions previously and no claims for compensation have been made. However it is important to note that there is a risk that compensation claims could be made as a result of the new immediate Article 4 Directions within the next 12 months.
297. Any claim for compensation will be dealt with through the council's official complaints procedure and it is anticipated that any award would be

contained within the Planning division's budget. Should this not be possible support from council reserves would be sought. Any potential drawdown from council reserves for the payment of compensation claims will be subject to agreement by the relevant cabinet member, or full cabinet in the case of claims over £50,000.

298. The non-immediate directions for offices in the CAZ and railway arches will be made more than one year before the expiry of the existing exemption from the permitted development right (by Southwark's existing Article 4 Direction) so applicants will not be entitled to claim compensation.

13. SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Strategic Director of Law and Governance

299. Paragraphs 8 to 22 of this report set out recent legislative changes, in particular amendments to the Town and Country Planning (Use Classes) Order 1987 and Town and Country Planning (General Permitted Development) (England) Order 2015 ('GPDO') These significant changes include the introduction of a Class E use (commercial, business and service) (see paragraph 8) and now associated permitted development rights to change use from Class E to Class C3 residential under a new class MA in the GPDO. The extent and impact of the changes have been considered against the planning policy direction of the development plan for Southwark, bearing in mind the advanced stage of preparation of the New Southwark Plan, which has now been through Examination in Public (paragraphs 47 to 49).
300. Directions under Article 4 of the GPDO permit a local planning authority to direct, if satisfied that it is expedient to do so, that certain descriptions of development in Schedule 2 of the GPDO should not be carried out unless permission is granted on application, therefore disapplying the permitted development rights specified in the direction. The recommendations section of this report outlines the new directions sought to remove permitted development rights introduced by Classes MA and ZA of the GPDO.
301. Paragraph 10 of Part 3F of the Council's Constitution states that it is the responsibility of planning committee to authorise directions under Article 4 so members must satisfy themselves that it is expedient to make the directions proposed in this report.
302. Members are also asked to note the import of the very recent Written Ministerial Statement referred to in paragraph 18 of this report which explains the changes to paragraph 53 of the National Planning Policy Framework (NPPF). In relation to the removal of permitted development rights relating to a change from non residential to residential use, the use

of Article 4 directions must be limited to situations '*necessary to avoid wholly unacceptable adverse impacts*' and in other cases '*be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area*'. In all cases the directions must be based on robust evidence and apply to the smallest geographical area possible. The report includes detailed evidence drawn from the recent preparations for the New Southwark Plan and explains the reasons behind the choice of geographic locations to which the proposed directions will apply.

303. Members are asked to note the preceding paragraphs entitled 'Financial Implications' and paragraphs 28 to 32 of the report concerning the potential compensation payable in the case of the 'immediate' directions. Three of the four proposed new directions are immediate. The report explains that compensation may be payable where a person with a land interest has incurred expenditure in carrying out work which is rendered abortive because of the Article 4 direction or has otherwise sustained loss or damage which is directly attributable to it.

Strategic Director of Finance and Governance (CE21/020)

304. This report is requesting planning committee to approve three immediate Article 4 Directions (Appendix A) and one non immediate Article 4 directions to withdraw the permitted development rights as part of the schedule 2 of the Town and Country Planning (General Permitted Development) (GPDO) Order 2015 (as amended), as detailed in the recommendations. Full details and background are contained within the main body of the report.
305. The report is also requesting the planning committee to note the equalities analysis of the proposed Article 4 Directions and also delegate to the Director of Planning and Growth the arrangements for making the Article 4 Direction including compliance with the notification requirements under the Town and Country Planning (General Permitted Development) Order 2015 (as amended). Full details and background is provided within the main body of the report.
306. The strategic director of finance and governance notes that the proposed Directions may make the council liable for compensation claims but it is not possible to gauge the magnitude of such claims as circumstances vary. It is noted that any claim for compensation will be dealt through the council's official complaints procedure and sanctioned by the relevant cabinet member under the council's constitution as reflected in the report.
307. It is also noted that any agreed claims for compensation would be contained within the existing departmental revenue budgets where possible before funding from councils reserves are requested.

308. Staffing and any other costs connected with this recommendation to be contained within existing departmental revenue budgets.

14. BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
General Permitted Development Order 2015 (as amended)	https://www.legislation.gov.uk/primary+secondary?title=general%20permitted%20development	planningpolicy@southwark.gov.uk
New Southwark Plan – Council's Proposed Changes to the Submission Version August 2020	https://www.southwark.gov.uk/assets/attach/34777/NSP-Print-Version-25.02.2021.pdf	planningpolicy@southwark.gov.uk
London Plan 2021	https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021	planningpolicy@southwark.gov.uk
Authority Monitoring Report (Employment and Retail)	<p>SP425 - Authority Monitoring Report: Employment (B class) development figures (2011– 2019) (pdf, 297kb)</p> <p>SP430 - Authority Monitoring Report: Retail (A class) development figures (2011 - 2019)</p>	planningpolicy@southwark.gov.uk
Southwark Employment and Retail Evidence base (Submission documents)	<p>SP411 - Southwark's Economic Wellbeing Strategy 2017 – 2022 (2017) (pdf, 2.2mb)</p> <p>SP412 - Southwark's Employment Land Review (Part 1 Final Report) (2016) (pdf, 2.3mb)</p>	planningpolicy@southwark.gov.uk

	<p><u>SP413 - Southwark Industrial and Warehousing Land Study (2014)</u> (pdf, 3mb)</p> <p><u>SP413A - Southwark Industrial and Warehousing Land Study: Appendix 1-3</u> (zip, 3.4mb)</p> <p><u>SP414 - Southwark Retail Study (2015) Part 1 of 2</u> (pdf, 3.2mb)</p> <p><u>SP415 - Southwark Retail Study (2015) Part 2 of 2</u> (pdf, 6mb)</p> <p><u>SP416 - Southwark High Streets Survey Methodology (2015)</u> (pdf, 902kb)</p> <p><u>SP417 - Southwark High Streets Survey Report (2015)</u> (pdf, 950kb)</p> <p><u>SP418 - Understanding Perceptions of Southwark Town Centres (2014)</u> (pdf, 5.4mb)</p> <p><u>SP419 - Southwark Retail Study Old Kent Road Update (2018)</u> (pdf, 1.8mb)</p> <p><u>SP420 - Southwark Cultural Strategy (2017)</u> (pdf, 3mb)</p> <p><u>SP421 - Old Kent Road Business Survey Update (2019)</u> (pdf, 9.4mb)</p> <p><u>SP422 - Affordable</u></p>	
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	<p>workspace in Southwark – Evidence of needs (2019) (pdf, 5.4mb)</p> <p>SP423 - New Southwark Plan Housing and Affordable Workspace Viability update (2019) (pdf, 3mb)</p> <p>SP431 - Old Kent Road Workspace Demand Study (2019) (pdf, 21.9mb)</p> <p>SP401 - Industrial land background paper (pdf, 1.5mb)</p> <p>SP402 - Offices background paper (pdf, 1.3mb)</p> <p>SP403 - Retail background paper (pdf, 1.7mb)</p> <p>SP404 - Hotels background paper (pdf, 296kb)</p>	
<p>Southwark Employment and Retail Evidence base (Examination documents)</p>	<p>EIP82b - Site Allocations Methodology Report (May 2021) (pdf, 25.1mb)</p> <p>EIP145 - South Bermondsey Dive Under masterplan (October 2020) (pdf, 54mb)</p> <p>EIP149 - Old Kent Road Existing and Proposed (Jan</p>	<p>planningpolicy@southwark.gov.uk</p>

	<p>2021) (pdf, 10.7mb)</p> <p>EIP150 - Old Kent Road Accomodation Schedule (Jan 2021) (pdf, 8mb)</p> <p>EIP204 - UCO NSP Site Allocation Modifications</p> <p>EIP207 - Strategics Policies Note (pdf,</p> <p>EIP128 - Old Kent Road AAP (Dec 2020)</p> <p>EIP162 - Southwark Council response to changes to the Use Class Order and the impact on the NSP</p>	
Ministerial Statement 1 July 2021	https://questions-statements.parliament.uk/written-statements/detail/2021-07-01/hcws145	planningpolicy@southwark.gov.uk
Southwark Five and Fifteen Year Housing Land Supply	EIP198a - 5 and 15 Year Housing Land Supply and Appendices (June 2021)	planningpolicy@southwark.gov.uk
Union Street Partners' Quarter 1 2021 London South Bank Office and Retail Markets Research Report	https://www.unionstreetpartners.co.uk/news/view/quarterly-research-released	planningpolicy@southwark.gov.uk

15. APPENDICES

No.	Title
Appendix A	Draft Article 4 Directions proposed
Appendix B	Map of the areas subject to proposed Article 4 Directions
Appendix C	Equalities Impact Assessment
Appendix D	GLA strategic evidence to support London borough Article 4 Directions

16. AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Laura Hills, Team Leader Planning Policy	
Version	Final	
Dated	7 July 2021	
Key Decision?	Non-key	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE MEMBER		
Officer Title	Comments Sought	Comments included
Director of Legal Services	Yes	Yes
Finance Director	Yes	Yes
Cabinet Member	Yes	No
Date final report sent to Constitutional/Community Council/Scrutiny Team	8 July 2021	

Article 4 Directions relating to demolition and change of use from commercial buildings to residential

No.	Title
Appendix A	Draft Article 4 Directions proposed
Appendix B	Map of the areas subject to proposed Article 4 Directions
Appendix C	Equalities Impact Assessment
Appendix D	GLA strategic evidence to support London borough Article 4 Directions

**TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT)
(ENGLAND) ORDER 2015 (AS AMENDED)**

**DIRECTION WITHOUT IMMEDIATE EFFECT
MADE UNDER ARTICLE 4(1) TO WHICH ARTICLE 6 APPLIES**

WHEREAS the London Borough of Southwark being the appropriate local planning authority within the meaning of article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) are satisfied that it is expedient that development of the description(s) set out in the Schedule A below should not be carried out on the land as outlined in Schedule 1 and shown edged red on the attached plans, unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990, as amended.

NOW THEREFORE the said Council in pursuance of the power conferred on them by article 4(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) hereby direct that the permission granted by article 3 of the said Order shall not apply to development on the said land of the description(s) set out in the Schedule A below.

SCHEDULE A

Development consisting of a change of use of a building and any land within its curtilage from a use falling within Class E(g)(i) (offices) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended), to a use falling within Class C3 (dwellinghouses) of that Schedule being development comprised within Class MA of Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

THIS DIRECTION is made under article 4(1) of the said Order and, in accordance with paragraph 1(4)(e) of Schedule 3 of the Order, shall come into force on 1 August 2022.

1. Made under the Common Seal of the London Borough of Southwark thisday of.....20.....

The Common Seal of the Mayor
and Burgesses of the London Borough
of Southwark was hereto
affixed in the presence of

.....
Authorised Signatory

2. Confirmed under the Common Seal of the London Borough of Southwark thisday of.....20.....

The Common Seal of the Mayor
and Burgesses of the London Borough
of Southwark was hereto
affixed in the presence of

.....
Authorised Signatory

SCHEDULE 1

Central Activities Zone in Southwark
Railway arches in Southwark

Maps as per Appendix B

**TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT)
(ENGLAND) ORDER 2015 (AS AMENDED)**

**DIRECTION WITH IMMEDIATE EFFECT
MADE UNDER ARTICLE 4(1) TO WHICH ARTICLE 6 APPLIES**

WHEREAS the London Borough of Southwark being the appropriate local planning authority within the meaning of article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) are satisfied that it is expedient that development of the description(s) set out in the Schedule A below should not be carried out on the land as outlined in Schedule 1 and shown edged red on the attached plans, unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990, as amended.

NOW THEREFORE the said Council in pursuance of the power conferred on them by article 4(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) hereby direct that the permission granted by article 3 of the said Order shall not apply to development on the said land of the description(s) set out in the Schedule A below.

SCHEDULE A

Development consisting of a change of use of a building and any land within its curtilage from a use falling within Class E(a-f, g(ii-iii)) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended), to a use falling within Class C3 (dwellinghouses) of that Schedule being development comprised within Class MA of Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

THIS DIRECTION is made under article 4(1) of the said Order and, in accordance with article 4(4) of the Order, shall remain in force until _____ (being six months from the date of these directions) and shall then expire unless it has been confirmed by the appropriate local planning authority in accordance with paragraph 2(6) of Schedule 3 of the said Order before the end of the six month period.

1. Made under the Common Seal of the London Borough of Southwark thisday of.....20.....

The Common Seal of the Mayor
and Burgesses of the London Borough
of Southwark was hereto
affixed in the presence of

.....
Authorised Signatory

2. Confirmed under the Common Seal of the London Borough of Southwark thisday of.....20.....

The Common Seal of the Mayor

and Burgesses of the London Borough
of Southwark was hereto
affixed in the presence of

.....
Authorised Signatory

SCHEDULE 1

Central Activities Zone in Southwark
Railway arches in Southwark

Maps as per Appendix B

**TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT)
(ENGLAND) ORDER 2015 (AS AMENDED)**

**DIRECTION WITH IMMEDIATE EFFECT
MADE UNDER ARTICLE 4(1) TO WHICH ARTICLE 6 APPLIES**

WHEREAS the London Borough of Southwark being the appropriate local planning authority within the meaning of article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) are satisfied that it is expedient that development of the description(s) set out in the Schedule A below should not be carried out on the land as outlined in Schedule 1 and shown edged red on the attached plans, unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990, as amended.

NOW THEREFORE the said Council in pursuance of the power conferred on them by article 4(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) hereby direct that the permission granted by article 3 of the said Order shall not apply to development on the said land of the description(s) set out in the Schedule A below.

SCHEDULE A

Development consisting of a change of use of a building and any land within its curtilage from a use falling within Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended), to a use falling within Class C3 (dwellinghouses) of that Schedule being development comprised within Class MA of Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

THIS DIRECTION is made under article 4(1) of the said Order and, in accordance with article 4(4) of the Order, shall remain in force until _____ (being six months from the date of these directions) and shall then expire unless it has been confirmed by the appropriate local planning authority in accordance with paragraph 2(6) of Schedule 3 of the said Order before the end of the six month period.

1. Made under the Common Seal of the London Borough of Southwark thisday of.....20.....

The Common Seal of the Mayor
and Burgesses of the London Borough
of Southwark was hereto
affixed in the presence of

.....
Authorised Signatory

2. Confirmed under the Common Seal of the London Borough of Southwark thisday of.....20.....

The Common Seal of the Mayor
and Burgesses of the London Borough
of Southwark was hereto
affixed in the presence of

.....
Authorised Signatory

SCHEDULE 1

Town centres outside the CAZ

Name
Elephant and Castle Major Town Centre (partial)
Peckham Major Town Centre
Canada Water Major Town Centre
Old Kent Road North District Town Centre (partial)
Old Kent Road South District Town Centre
Lordship Lane District Town Centre
Herne Hill District Town Centre
Camberwell District Town Centre
The Blue Local Town Centre
Dulwich Village Local Town Centre
Nunhead Local Town Centre
Tower Bridge Road Local Town Centre

Strategic Protected Industrial Land

Schedule ID	Name
NSP SPIL1	Discovery Business Park
NSP SPIL2	Galleywall and Bermondsey Trading Estates, Bermondsey railway arches and Rotherhithe Business Estate
NSP SPIL3	Admiral Hyson Trading Estate
NSP SPIL4	Integrated Waste Management Facility, Electricity Substation and Ormside Street
NSP SPIL5	Glengall Road Business Centre
NSP SPIL 6	Old Jamaica Road Industrial Estate

Site allocations outside the CAZ

Schedule ID	Name	Development Plan Document
NSP01A	Aylesbury	New Southwark Plan
NSP10	Biscuit Factory and Campus	New Southwark Plan
NSP11	Tower Workshops	New Southwark Plan
NSP12	Chambers Wharf	New Southwark Plan

NSP21	Camberwell Station	New Southwark Plan
NSP22	Burgess Business Park	New Southwark Plan
NSP23	Butterfly Walk, Morrisons Car Park & Police Station	New Southwark Plan
NSP24	Valmar Trading Estate	New Southwark Plan
NSP25	Camberwell Bus Garage	New Southwark Plan
NSP26	Abellio Walworth Depot	New Southwark Plan
NSP27	Land Between Camberwell Station Road and Warner Road	New Southwark Plan
NSP28	Iceland, 120-132 Camberwell Road	New Southwark Plan
NSP29	49 Lomond Grove	New Southwark Plan
NSP30	83 Lomond Grove	New Southwark Plan
NSP31	123 Grove Park	New Southwark Plan
NSP32	Camberwell Green Magistrates Court	New Southwark Plan
NSP33	Denmark Hill Campus East	New Southwark Plan
NSP34	Guys and St Thomas Trust Rehabilitation Centre, Crystal Palace	New Southwark Plan
NSP35	The Grove Tavern, 520 Lordship Lane	New Southwark Plan
NSP36	Kwik Fit and Gibbs & Dandy, Grove Vale	New Southwark Plan
NSP37	Dulwich Hamlet Champion Hill Stadium, Dog Kennel Hill	New Southwark Plan
NSP38	Railway Rise, East Dulwich	New Southwark Plan
NSP39	Dulwich Community Hospital, East Dulwich Grove	New Southwark Plan
NSP40	Goose Green Trading Estate	New Southwark Plan
NSP48	Bath Trading Estate	New Southwark Plan
NSP53	Bricklayers Arms	New Southwark Plan
NSP54	Crimscott Street and Pages Walk	New Southwark Plan
NSP55	Mandela Way	New Southwark Plan
NSP56	107 Dunton Road (Tesco and car park) and Southernwood Retail Park	New Southwark Plan
NSP57	Salisbury estate car park	New Southwark Plan
NSP58	96-120 Old Kent Road (Lidl store)	New Southwark Plan
NSP59	Former petrol filling station, 233-247 Old Kent Road	New Southwark Plan
NSP60	Kinglake Street Garages	New Southwark Plan
NSP61	4/12 Albany Road	New Southwark Plan
NSP62	Former Southern Railway Stables	New Southwark Plan
NSP63	Land bounded by Glengall Road, Latona Road and Old Kent Road	New Southwark Plan
NSP64	Marlborough Grove and St James's Road	New Southwark Plan
NSP65	Sandgate Street and Verney Road	New Southwark Plan
NSP66	Devon Street and Sylvan Grove	New Southwark Plan
NSP67	Hatcham Road, Penarth Street and Ilderton Road	New Southwark Plan
NSP68	760 and 812 Old Kent Road (Toys'r'us store), and 840 Old Kent Road (Aldi store)	New Southwark Plan

NSP69	684-698 Old Kent Road (Kwikfit garage)	New Southwark Plan
NSP70	636 Old Kent Road	New Southwark Plan
NSP71	Aylesham Centre and Peckham Bus Station	New Southwark Plan
NSP72	Blackpool Road Business Park	New Southwark Plan
NSP73	Land between the railway arches (east of Rye Lane including railway arches)	New Southwark Plan
NSP74	Copeland Industrial Park and 1-27 Bournemouth Road	New Southwark Plan
NSP75	Rotherhithe Gasometer	New Southwark Plan
NSP76	St Olav's Business Park, Lower Road	New Southwark Plan
NSP77	Decathlon Site and Mulberry Business Park	New Southwark Plan
NSP78	Harmsworth Quays, Surrey Quays Leisure Park, Surrey Quays Shopping Centre and Robert's Close	New Southwark Plan
NSP79	Croft Street Depot	New Southwark Plan
NSP80	Morrisons, Walworth Road	New Southwark Plan
NSP81	330-344 Walworth Road	New Southwark Plan
NSP82	Chatelaine House, Walworth Road	New Southwark Plan

Primary Shopping Frontages outside the CAZ

Schedule ID	Name	
SF1	Peckham	43-125 (odd) Rye Lane Units 1-10 (con) & Units 12-18 (con), Aylesham Centre, Rye Lane 1-5 (con) Central Buildings, Rye Lane 2-82 (even) Rye Lane 46-66 (even) Peckham High Street 74-122 (even) Peckham High Street 127-149 (odd) Rye Lane 151-175 (odd) Rye Lane 84-114 (even) Rye Lane 116a-150 (even) Rye Lane
SF2	Walworth Road	199-345 (odd) Walworth Road 204-326 (even) Walworth Road 347-375 (odd) Walworth Road 330-356 (even) Walworth Road 358-374 (even) Walworth Road
SF3	Camberwell	334-354 (even) Camberwell New Road 8-76 (even) Denmark Hill 1-23 (odd) Denmark Hill (Units) 1-17 (con) Butterfly Walk 7-17 (con) Camberwell Green 18-25 (con) Camberwell Green 27 Camberwell Green and 3-23 (odd) Camberwell Church Street 2-28 (even) Camberwell Church Street 319-325 (odd) Camberwell New Road 25-43 (odd) Denmark Hill

SF4	Lordship Lane	1-27 (odd) Lordship Lane 29-43 (odd) Lordship Lane 45-91 (odd) Lordship Lane 93-115 (odd) Lordship Lane 98-106 (even) Grove Vale 2-6 (even) Lordship Lane 8-24 (even) Lordship Lane 26-44 (even) Lordship Lane 46-66 (even) Lordship Lane 68-94 (even) Lordship Lane 96-106 (even) Lordship Lane
SF5	The Blue	186-194a (even) Southwark Park Road 196-256 (even) Southwark Park Road 193-221 (odd) Southwark Park Road 1-14 (con) Market Place, Southwark Park Road 239-243 (odd) Southwark Park Road 258-270 (even) Southwark Park Road 249-289a (odd) Southwark Park Road 177-191 (odd) Southwark Park Road
SF14	Tooley Street	96-106 Tooley Street

Secondary Shopping Frontages outside the CAZ

Schedule ID	Name	
SF16	Dockhead	23-41 (odd) Dockhead
SF17	Jamaica Road	125-151 (odd) Jamaica Road
SF18	Jamaica Road	142-145 (con) Jamaica Road 156-250 (even) Jamaica Road
SF19	Albion Street	20-52 (even) Albion Street
SF20	Harper Road	16-42 Harper Road
SF21 (partially outside CAZ)	Tower Bridge Road	66-102 (even) Tower Bridge Road 73-113a (odd) Tower Bridge Road 104-116 (even) Tower Bridge Road 25-71 (odd) Tower Bridge Road
SF22	Lower Road and Plough Way	162-196 (even) Lower Road 126-160 (even) Lower Road 198-220 (even) Lower Road 185-205 (odd) Lower Road 229-243 (odd) Lower Road 1-15 (odd) Plough Way 17-27 (odd) Plough Way
SF23	Walworth Road, East Street and Camberwell Road	389-407 (odd) Walworth Road 376-24 (even) Walworth Road/Camberwell Road 1-39 (odd) Camberwell Road 49-67 (odd) Camberwell Road 73-91 (odd) Camberwell Road 26-44 (even) Camberwell Road 1-83 (odd) East Street 2-92 (even) East Street 112-118 (even) East Street 94-98 (even) East Street 1-31 (odd) West Moreland Road

SF24	Old Kent Road, East Street and Dunton Road	157-231 (odd) Old Kent Road 249-279 (odd) Old Kent Road 202-206 (even) Dunton Road 152-322 (even) Old Kent Road 352-388 (even) Old Kent Road 303-311 (odd) East Street 342-358 (even) East Street
SF25	Ilderton Road	1-17 (odd) Ilderton Road
SF26	Maddock Way	1-15 (odd) Maddock Way 2-34 (even) Maddock Way
SF27	Peckham Park Road and Old Kent Road	1-21 (odd) Peckham Park Road 6-24 (even) Peckham Park Road 620-638 (even) Old Kent Road 644-674 (even) Old Kent Road 720-726 (even) Old Kent Road
SF28	Camberwell	25-53 (odd) Camberwell Church Street 55-75 (odd) Camberwell Church Street 30-58a (even) Camberwell Church Street 2-4 (even) Grove Lane 45-81 (odd) Denmark Hill 2-8a (even) Coldharbour Lane 10-16 (even) Coldharbour Lane
SF29	Vestry Road	72-88 (even) Vestry Road
SF30	Peckham	2-10 (even) Blenheim Grove 3, 4, 5, 10, 12 & 14 Station Way, Rye Lane 2-38 (even) Peckham High Street 176-188 (even) Lambrook House, Peckham High Street 1-51 (odd) Peckham High Street 151-175 (odd) Peckham High Street 59-77 (odd) Peckham High Street 91-126 (odd) Peckham High Street/Peckham Hill Street 109-149 (odd) Peckham High Street 143-165 (odd) Peckham Hill Street 177-235 (odd) Rye Lane 249-265 (odd) Rye Lane 275-295 (odd) Rye Lane 152-204 (even) Rye Lane 206-232 (even) Rye Lane 24-68 (even) Peckham Rye 2-4 (even) Atwell Road 2-46 (even) Choumert Road 1-7 The Market (odd) Choumert Road 1-7c Choumert Road
SF31	Queens Road	151-193 (odd) Queens Road
SF32	Bellenden Road	113-163 (odd) Bellenden Road 168-196 (even) Bellenden Road
SF33	Gibbon Road	2-22 (even) Gibbon Road 50-64 (even) Gibbon Road
SF34	Evelina Road, Nunhead Green and Kirkwood	2, 2a, 2b Kirkwood Road and 116-122 (even) Evelina Road 111-133 (odd) Evelina Road

	Road	135-147 (odd) Evelina Road and 40-44 (even) Nunhead Green 24-38 (even) Nunhead Green 88 - 106 (even) Evelina Road
SF35	Grove Vale	21-53 (odd) Grove Vale 24-56 (even) Grove Vale 1-6 (con) & 4 - 14 (con) Melbourne Grove
SF36	East Dulwich Road	34-60 (even) East Dulwich Road
SF37	Crossthwaite Avenue	6-20 (even) Crossthwaite Avenue
SF38	Lordship Lane	117-131 (odd) Lordship Lane 133-155 (odd) Lordship Lane 157-171 (odd) Lordship Lane 116 - 134 (even) Lordship Lane 201 - 211 (odd) Lordship Lane
SF39	North Cross Road	33-65 (odd) North Cross Road
SF40	Herne Hill	63-77 (odd) Herne Hill
SF41	Half Moon Lane	1-27a (odd) Half Moon Lane 2a-6 (even) Half Moon Lane 12-24 (even) Half Moon Lane
SF42	Norwood Road	15-87 (odd) Norwood Road
SF43	Dulwich Village and Calton Avenue	25-49 (odd) Dulwich Village and 1a-1d (con) Calton Avenue
SF44	Dulwich Village	73-91 (odd) Dulwich Village 70-98 (even) Dulwich Village
SF45	Lordship Lane	351-379 (odd) Lordship Lane 383-401 (odd) Lordship Lane 338-366 (even) Lordship Lane
SF46	Forest Hill Road	2-46 (even) Forest Hill Road
SF47	Forest Hill Road	92-126 (even) Forest Hill Road
SF48	Lordship Lane	481-533 (odd) Lordship Lane
SF49	Croxted Road and Park Hall Road	2-12 (even) Croxted Road 80-96 (even) Park Hall Road
SF50	Seeley Drive	30-41 (con) Seeley Drive
SF51	Nunhead Lane	60-66 Nunhead Lane and 2-8 Nunhead Lane
SF52	Camberwell New Road	253-153 (odd) Camberwell New Road
SF53	Southampton Way	125-181 (odd) Southampton Way 156-160 (even) Southampton Way
SF54	Camberwell Road	201-227 (odd) Camberwell Road
SF55	East Street	211-239 (odd) East Street
SF56	Camberwell Road	108-164 (even) Camberwell Road 157-179 (odd) Camberwell Road

Maps as per Appendix B

**TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT)
(ENGLAND) ORDER 2015 (AS AMENDED)**

**DIRECTION WITH IMMEDIATE EFFECT
MADE UNDER ARTICLE 4(1) TO WHICH ARTICLE 6 APPLIES**

WHEREAS the London Borough of Southwark being the appropriate local planning authority within the meaning of article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) are satisfied that it is expedient that development of the description(s) set out in the Schedule A below should not be carried out on the land as outlined in Schedule 1 and shown edged red on the attached plans, unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990, as amended.

NOW THEREFORE the said Council in pursuance of the power conferred on them by article 4(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) hereby direct that the permission granted by article 3 of the said Order shall not apply to development on the said land of the description(s) set out in the Schedule A below.

SCHEDULE A

Development consisting of demolition of buildings comprising a single purpose-built detached block of flats or single detached building, comprising premises established for office use falling within Class B1(a), for research and development falling within Class B1(b) or for an industrial process falling within Class B1(c) of the Schedule to the Town and Country Planning (Use Classes) (England) Order 1987, and replacement with a single building comprising either a detached dwellinghouse or block of flats comprised within Class ZA of Part 20 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

THIS DIRECTION is made under article 4(1) of the said Order and, in accordance with article 4(4) of the Order, shall remain in force until _____ (being six months from the date of these directions) and shall then expire unless it has been confirmed by the appropriate local planning authority in accordance with paragraph 2(6) of Schedule 3 of the said Order before the end of the six month period.

1. Made under the Common Seal of the London Borough of Southwark thisday of.....20.....

The Common Seal of the Mayor
and Burgesses of the London Borough
of Southwark was hereto
affixed in the presence of

.....
Authorised Signatory

2. Confirmed under the Common Seal of the London Borough of Southwark thisday of.....20.....

The Common Seal of the Mayor
and Burgesses of the London Borough
of Southwark was hereto
affixed in the presence of

.....
Authorised Signatory

SCHEDULE 1

Central Activities Zone in Southwark

Town centres

Name
Elephant and Castle Major Town Centre
Peckham Major Town Centre
Canada Water Major Town Centre
Old Kent Road North District Town Centre
Old Kent Road South District Town Centre
Lordship Lane District Town Centre
Herne Hill District Town Centre
Bankside and The Borough District Town Centre
London Bridge District Town Centre
Camberwell District Town Centre
The Blue Local Town Centre
Dulwich Village Local Town Centre
Nunhead Local Town Centre
Tower Bridge Road Local Town Centre

Strategic Protected Industrial Land

Schedule ID	Name
NSP SPIL1	Discovery Business Park
NSP SPIL2	Galleywall and Bermondsey Trading Estates, Bermondsey railway arches and Rotherhithe Business Estate
NSP SPIL3	Admiral Hyson Trading Estate
NSP SPIL4	Integrated Waste Management Facility, Electricity Substation and Ormside Street
NSP SPIL5	Glengall Road Business Centre
NSP SPIL 6	Old Jamaica Road Industrial Estate

Site allocations

Schedule ID	Name	Development Plan Document
NSP01	Site Bordering Great Suffolk Street and Ewer Street	New Southwark Plan
NSP01A	Aylesbury	New Southwark Plan
NSP02	62-67 Park Street	New Southwark Plan
NSP03	185 Park Street	New Southwark Plan
NSP04	London Fire and Emergency Planning Authority	New Southwark Plan
NSP05	1 Southwark Bridge Road and Red Lion Court	New Southwark Plan
NSP06	Landmark Court	New Southwark Plan
NSP07	Land between Great Suffolk Street and Glasshill Street	New Southwark Plan
NSP08	Swan Street Cluster	New Southwark Plan
NSP09	19, 21 and 23 Harper Road, 325 Borough High Street, 1-5 and 7-11 Newington Causeway	New Southwark Plan
NSP10	Biscuit Factory and Campus	New Southwark Plan
NSP11	Tower Workshops	New Southwark Plan
NSP12	Chambers Wharf	New Southwark Plan
NSP13	Conoco House, Quadrant House, Edward Edwards House and Suthring House	New Southwark Plan
NSP14	Friars House, 157-168 Blackfriars Road	New Southwark Plan
NSP15	Land enclosed by Colombo Street, Meymott Street and Blackfriars Road	New Southwark Plan
NSP16	Ludgate House & Sampson House, 64 Hopton Street	New Southwark Plan
NSP17	Southwark Station and 1 Joan Street	New Southwark Plan
NSP18	McLaren House, St George's Circus	New Southwark Plan
NSP19	Land between Paris Gardens, Colombo Street, Blackfriars Road and Stamford Street	New Southwark Plan
NSP20	1-5 Paris Garden and 16-19 Hatfields	New Southwark Plan
NSP21	Camberwell Station	New Southwark Plan
NSP22	Burgess Business Park	New Southwark Plan
NSP23	Butterfly Walk, Morrisons Car Park & Police Station	New Southwark Plan
NSP24	Valmar Trading Estate	New Southwark Plan
NSP25	Camberwell Bus Garage	New Southwark Plan
NSP26	Abellio Walworth Depot	New Southwark Plan
NSP27	Land Between Camberwell Station Road and Warner Road	New Southwark Plan
NSP28	Iceland, 120-132 Camberwell Road	New Southwark Plan
NSP29	49 Lomond Grove	New Southwark Plan
NSP30	83 Lomond Grove	New Southwark Plan
NSP31	123 Grove Park	New Southwark Plan

NSP32	Camberwell Green Magistrates Court	New Southwark Plan
NSP33	Denmark Hill Campus East	New Southwark Plan
NSP34	Guys and St Thomas Trust Rehabilitation Centre, Crystal Palace	New Southwark Plan
NSP35	The Grove Tavern, 520 Lordship Lane	New Southwark Plan
NSP36	Kwik Fit and Gibbs & Dandy, Grove Vale	New Southwark Plan
NSP37	Dulwich Hamlet Champion Hill Stadium, Dog Kennel Hill	New Southwark Plan
NSP38	Railway Rise, East Dulwich	New Southwark Plan
NSP39	Dulwich Community Hospital, East Dulwich Grove	New Southwark Plan
NSP40	Goose Green Trading Estate	New Southwark Plan
NSP41	Newington Triangle	New Southwark Plan
NSP42	Bakerloo Line Sidings and 7 St George's Circus	New Southwark Plan
NSP43	63-85 Newington Causeway	New Southwark Plan
NSP44	Salvation Army Headquarters, Newington Causeway	New Southwark Plan
NSP45	Elephant & Castle Shopping Centre and London College of Communication	New Southwark Plan
NSP46	London Southbank University Quarter	New Southwark Plan
NSP47	1-5 Westminster Bridge Road	New Southwark Plan
NSP48	Bath Trading Estate	New Southwark Plan
NSP49	London Bridge Health Cluster	New Southwark Plan
NSP50	Land between Melior Street, St Thomas Street, Weston Street and Fenning Street	New Southwark Plan
NSP51	Land between St Thomas Street, Fenning Street, Melior Place, and Snowsfields	New Southwark Plan
NSP52	Colechurch House, London Bridge Walk	New Southwark Plan
NSP53	Bricklayers Arms	New Southwark Plan
NSP54	Crimscott Street and Pages Walk	New Southwark Plan
NSP55	Mandela Way	New Southwark Plan
NSP56	107 Dunton Road (Tesco and car park) and Southernwood Retail Park	New Southwark Plan
NSP57	Salisbury estate car park	New Southwark Plan
NSP58	96-120 Old Kent Road (Lidl store)	New Southwark Plan
NSP59	Former petrol filling station, 233-247 Old Kent Road	New Southwark Plan
NSP60	Kinglake Street Garages	New Southwark Plan
NSP61	4/12 Albany Road	New Southwark Plan
NSP62	Former Southern Railway Stables	New Southwark Plan
NSP63	Land bounded by Glengall Road, Latona Road and Old Kent Road	New Southwark Plan
NSP64	Marlborough Grove and St James's Road	New Southwark Plan
NSP65	Sandgate Street and Verney Road	New Southwark Plan
NSP66	Devon Street and Sylvan Grove	New Southwark Plan
NSP67	Hatcham Road, Penarth Street and Ilderton	New Southwark Plan

	Road	
NSP68	760 and 812 Old Kent Road (Toys'r'us store), and 840 Old Kent Road (Aldi store)	New Southwark Plan
NSP69	684-698 Old Kent Road (Kwikfit garage)	New Southwark Plan
NSP70	636 Old Kent Road	New Southwark Plan
NSP71	Aylesham Centre and Peckham Bus Station	New Southwark Plan
NSP72	Blackpool Road Business Park	New Southwark Plan
NSP73	Land between the railway arches (east of Rye Lane including railway arches)	New Southwark Plan
NSP74	Copeland Industrial Park and 1-27 Bournemouth Road	New Southwark Plan
NSP75	Rotherhithe Gasometer	New Southwark Plan
NSP76	St Olav's Business Park, Lower Road	New Southwark Plan
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NSP78	Harmsworth Quays, Surrey Quays Leisure Park, Surrey Quays Shopping Centre and Robert's Close	New Southwark Plan
NSP79	Croft Street Depot	New Southwark Plan
NSP80	Morrisons, Walworth Road	New Southwark Plan
NSP81	330-344 Walworth Road	New Southwark Plan
NSP82	Chatelaine House, Walworth Road	New Southwark Plan

Primary Shopping Frontages

Schedule ID	Name	
SF1	Peckham	43-125 (odd) Rye Lane Units 1-10 (con) & Units 12-18 (con), Aylesham Centre, Rye Lane 1-5 (con) Central Buildings, Rye Lane 2-82 (even) Rye Lane 46-66 (even) Peckham High Street 74-122 (even) Peckham High Street 127-149 (odd) Rye Lane 151-175 (odd) Rye Lane 84-114 (even) Rye Lane 116a-150 (even) Rye Lane
SF2	Walworth Road	199-345 (odd) Walworth Road 204-326 (even) Walworth Road 347-375 (odd) Walworth Road 330-356 (even) Walworth Road 358-374 (even) Walworth Road
SF3	Camberwell	334-354 (even) Camberwell New Road 8-76 (even) Denmark Hill 1-23 (odd) Denmark Hill (Units) 1-17 (con) Butterfly Walk 7-17 (con) Camberwell Green 18-25 (con) Camberwell Green 27 Camberwell Green and 3-23 (odd) Camberwell Church Street

		2-28 (even) Camberwell Church Street 319-325 (odd) Camberwell New Road 25-43 (odd) Denmark Hill
SF4	Lordship Lane	1-27 (odd) Lordship Lane 29-43 (odd) Lordship Lane 45-91 (odd) Lordship Lane 93-115 (odd) Lordship Lane 98-106 (even) Grove Vale 2-6 (even) Lordship Lane 8-24 (even) Lordship Lane 26-44 (even) Lordship Lane 46-66 (even) Lordship Lane 68-94 (even) Lordship Lane 96-106 (even) Lordship Lane
SF5	The Blue	186-194a (even) Southwark Park Road 196-256 (even) Southwark Park Road 193-221 (odd) Southwark Park Road 1-14 (con) Market Place, Southwark Park Road 239-243 (odd) Southwark Park Road 258-270 (even) Southwark Park Road 249-289a (odd) Southwark Park Road 177-191 (odd) Southwark Park Road
SF6	Hopton Street	50-62 (even) Hopton Street
SF7	The Cut	33-53 (odd) The Cut
SF8	Borough High Street	2-20 (even) Southwark Street 28-34 (even) Borough High Street 38-72 (even) Borough High Street 76-94 (even) Borough High Street 100-154 (even) Borough High Street 200-230 (even) Borough High Street 11-21 (odd) Borough High Street 27-109 (odd) Borough High Street 121, 123, 125, 127, 131 & 133-137 Borough High Street 145-149 (odd) Borough High Street 151-169 (odd) Borough High Street 1-9 Stoney Street
SF9	Waterloo Road	187-235 (odd) Waterloo Road
SF10	Great Suffolk Street	156-176 (even) Great Suffolk Street 101-109 (odd) Great Suffolk Street
SF11	Snowsfields and Weston Street	8-20 (con) Snowsfields 30-43 (con) Snowsfields 62-66 (even) Weston Street 92-101 (odd) Snowsfields
SF12	Colechurch House	2 1-9 Colechurch House (London Bridge Walk)
SF13	Hay's Galleria	Hay's Galleria 1-4 Battle Bridge Lane Frontages on Hay's Lane and Counter Street 51-57 (odd) Tooley Street (The Counting House)
SF14	Tooley Street	96-106 Tooley Street
SF15	Bermondsey Street	82-98 Bermondsey Street 112-132 Bermondsey Street 159-177 Bermondsey Street

		99-109 Bermondsey Street
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Secondary Shopping Frontages in town centres

Schedule ID	Name	
SF21	Tower Bridge Road	66-102 (even) Tower Bridge Road 73-113a (odd) Tower Bridge Road 104-116 (even) Tower Bridge Road 25-71 (odd) Tower Bridge Road
SF22	Lower Road and Plough Way	162-196 (even) Lower Road 126-160 (even) Lower Road 198-220 (even) Lower Road 185-205 (odd) Lower Road 229-243 (odd) Lower Road 1-15 (odd) Plough Way 17-27 (odd) Plough Way
SF23	Walworth Road, East Street and Camberwell Road	389-407 (odd) Walworth Road 376-24 (even) Walworth Road/Camberwell Road 1-39 (odd) Camberwell Road 49-67 (odd) Camberwell Road 73-91 (odd) Camberwell Road 26-44 (even) Camberwell Road 1-83 (odd) East Street 2-92 (even) East Street 112-118 (even) East Street 94-98 (even) East Street 1-31 (odd) West Moreland Road
SF24	Old Kent Road, East Street and Dunton Road	157-231 (odd) Old Kent Road 249-279 (odd) Old Kent Road 202-206 (even) Dunton Road 152-322 (even) Old Kent Road 352-388 (even) Old Kent Road 303-311 (odd) East Street 342-358 (even) East Street
SF27	Peckham Park Road and Old Kent Road	1-21 (odd) Peckham Park Road 6-24 (even) Peckham Park Road 620-638 (even) Old Kent Road 644-674 (even) Old Kent Road 720-726 (even) Old Kent Road
SF28	Camberwell	25-53 (odd) Camberwell Church Street 55-75 (odd) Camberwell Church Street 30-58a (even) Camberwell Church Street 2-4 (even) Grove Lane 45-81 (odd) Denmark Hill 2-8a (even) Coldharbour Lane 10-16 (even) Coldharbour Lane
SF30	Peckham	2-10 (even) Blenheim Grove 3, 4, 5, 10, 12 & 14 Station Way, Rye Lane 2-38 (even) Peckham High Street 176-188 (even) Lambrook House, Peckham High Street 1-51 (odd) Peckham High Street 151-175 (odd) Peckham High Street

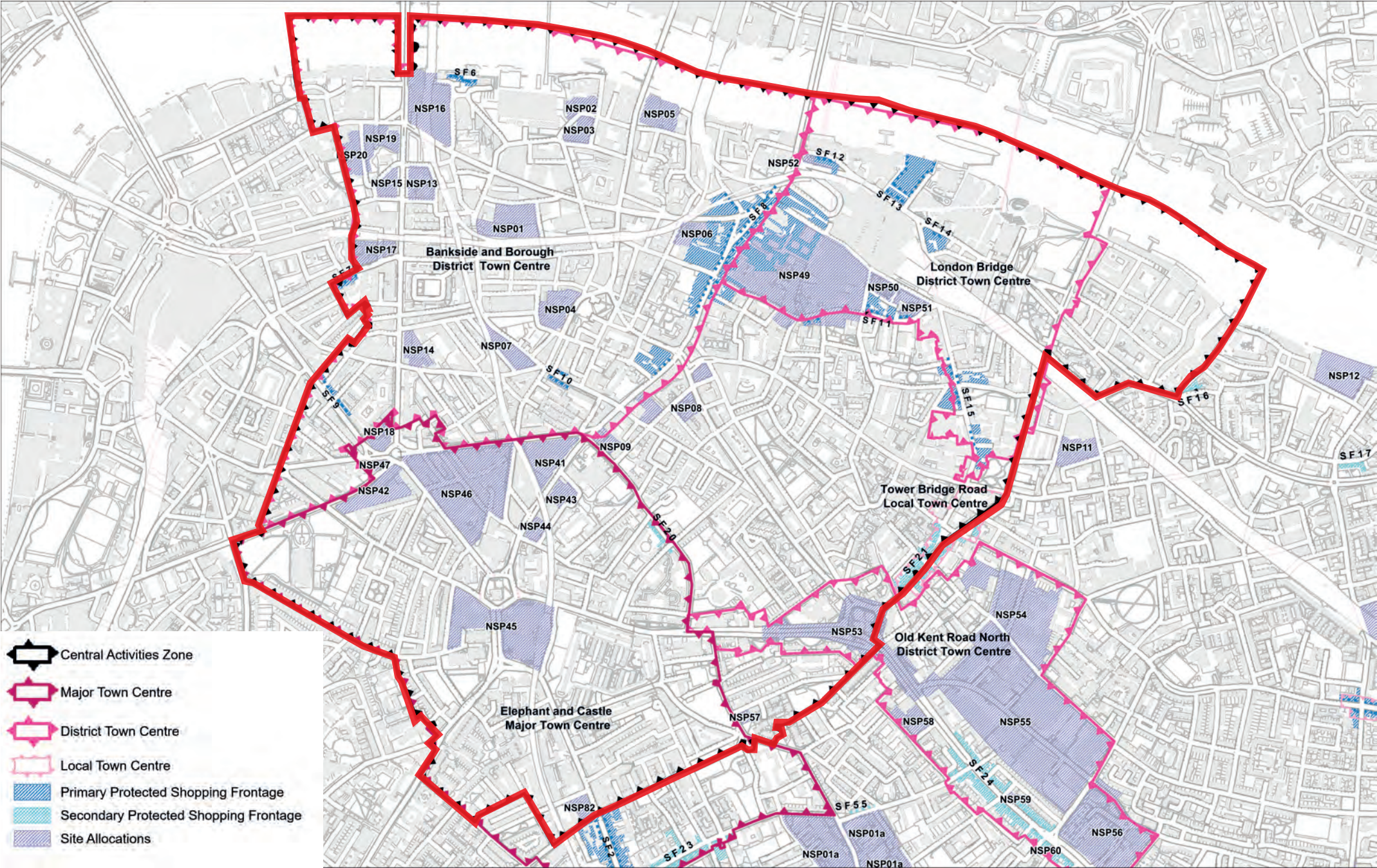
		59-77 (odd) Peckham High Street 91-126 (odd) Peckham High Street/Peckham Hill Street 109-149 (odd) Peckham High Street 143-165 (odd) Peckham Hill Street 177-235 (odd) Rye Lane 249-265 (odd) Rye Lane 275-295 (odd) Rye Lane 152-204 (even) Rye Lane 206-232 (even) Rye Lane 24-68 (even) Peckham Rye 2-4 (even) Atwell Road 2-46 (even) Choumert Road 1-7 The Market (odd) Choumert Road 1-7c Choumert Road
SF31	Queens Road	151-193 (odd) Queens Road
SF32	Bellenden Road	113-163 (odd) Bellenden Road 168-196 (even) Bellenden Road
SF33	Gibbon Road	2-22 (even) Gibbon Road 50-64 (even) Gibbon Road
SF34	Evelina Road, Nunhead Green and Kirkwood Road	2, 2a, 2b Kirkwood Road and 116-122 (even) Evelina Road 111-133 (odd) Evelina Road 135-147 (odd) Evelina Road and 40-44 (even) Nunhead Green 24-38 (even) Nunhead Green 88 - 106 (even) Evelina Road
SF35	Grove Vale	21-53 (odd) Grove Vale 24-56 (even) Grove Vale 1-6 (con) & 4 - 14 (con) Melbourne Grove
SF38	Lordship Lane	117-131 (odd) Lordship Lane 133-155 (odd) Lordship Lane 157-171 (odd) Lordship Lane 116 - 134 (even) Lordship Lane 201 - 211 (odd) Lordship Lane
SF39	North Cross Road	33-65 (odd) North Cross Road
SF40	Herne Hill	63-77 (odd) Herne Hill
SF41	Half Moon Lane	1-27a (odd) Half Moon Lane 2a-6 (even) Half Moon Lane 12-24 (even) Half Moon Lane
SF42	Norwood Road	15-87 (odd) Norwood Road
SF43	Dulwich Village and Calton Avenue	25-49 (odd) Dulwich Village and 1a-1d (con) Calton Avenue
SF44	Dulwich Village	73-91 (odd) Dulwich Village 70-98 (even) Dulwich Village
SF48	Lordship Lane	481-533 (odd) Lordship Lane
SF51	Nunhead Lane	60-66 Nunhead Lane and 2-8 Nunhead Lane
SF52	Camberwell New Road	253-153 (odd) Camberwell New Road

Maps as per Appendix B

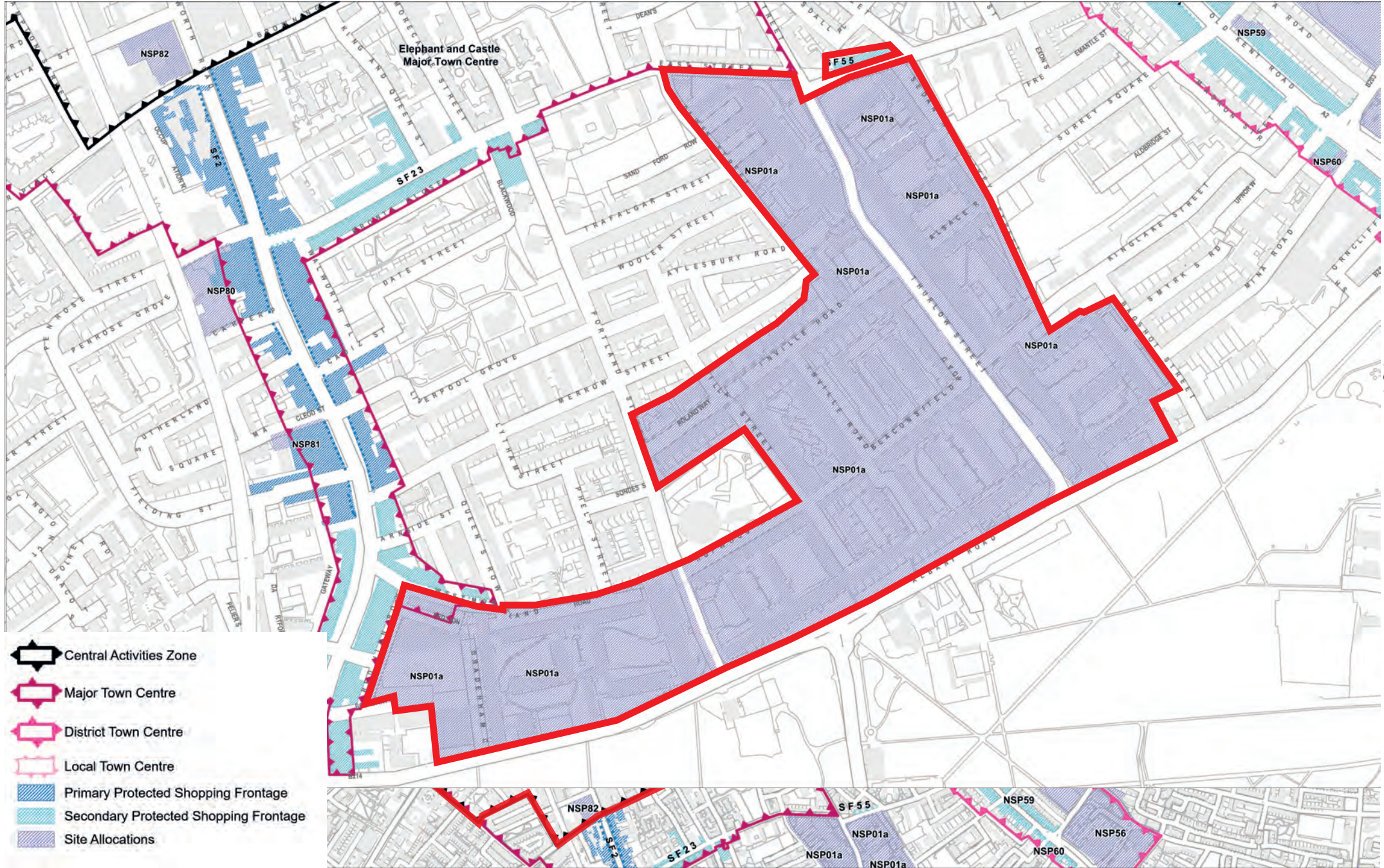
Article 4 Directions relating to demolition and change of use from commercial buildings to residential

No.	Title
Appendix A	Draft Article 4 Directions proposed
Appendix B	Map of the areas subject to proposed Article 4 Directions
Appendix C	Equalities Impact Assessment
Appendix D	GLA strategic evidence to support London borough Article 4 Directions

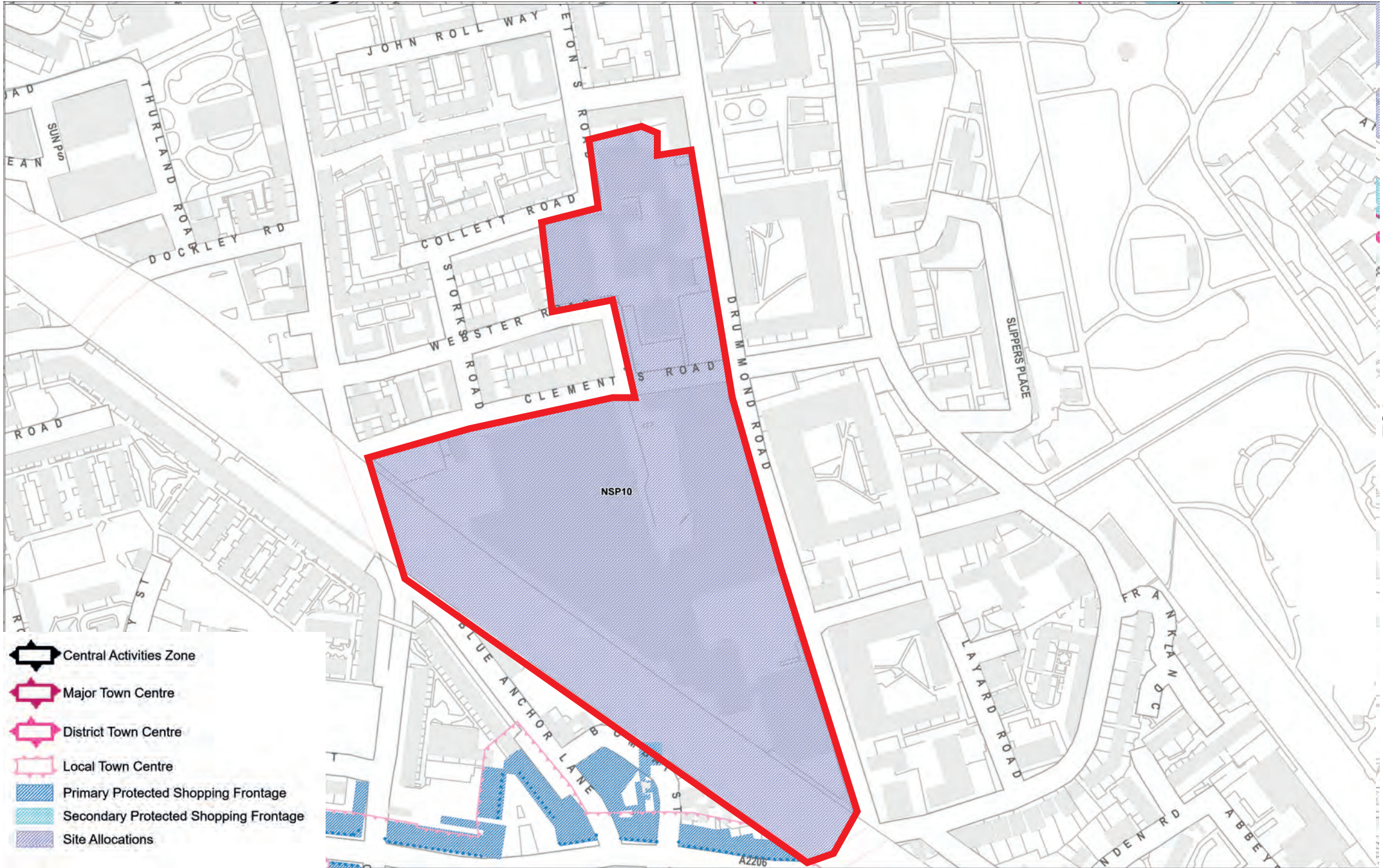
Central Activities Zone (CAZ)



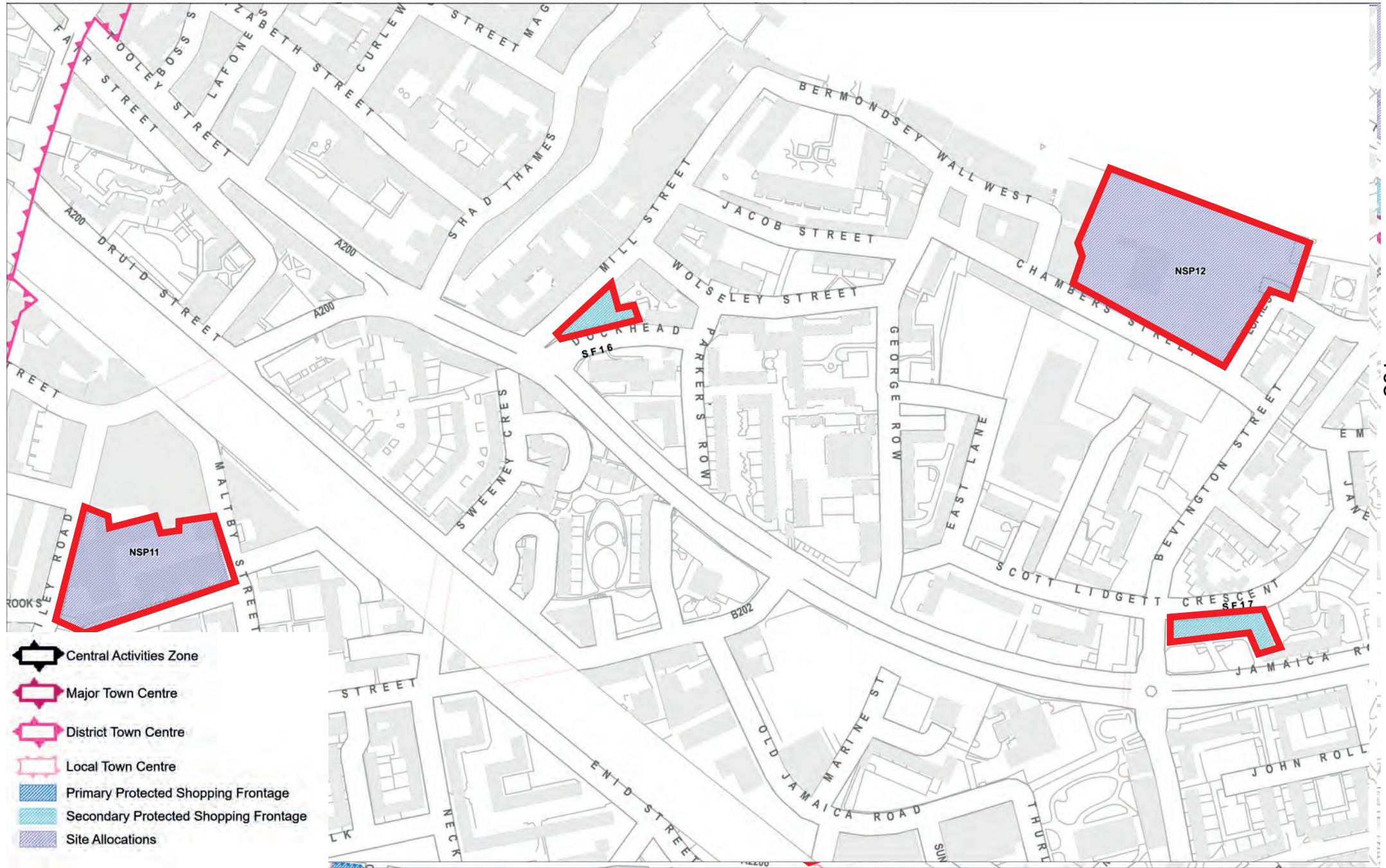
Site Allocation SP01a (CAZ) Secondary Protected Shopping Frontage: SF55



Site Allocation NSP10 (A2) Secondary Protected Shopping Frontage: SF55

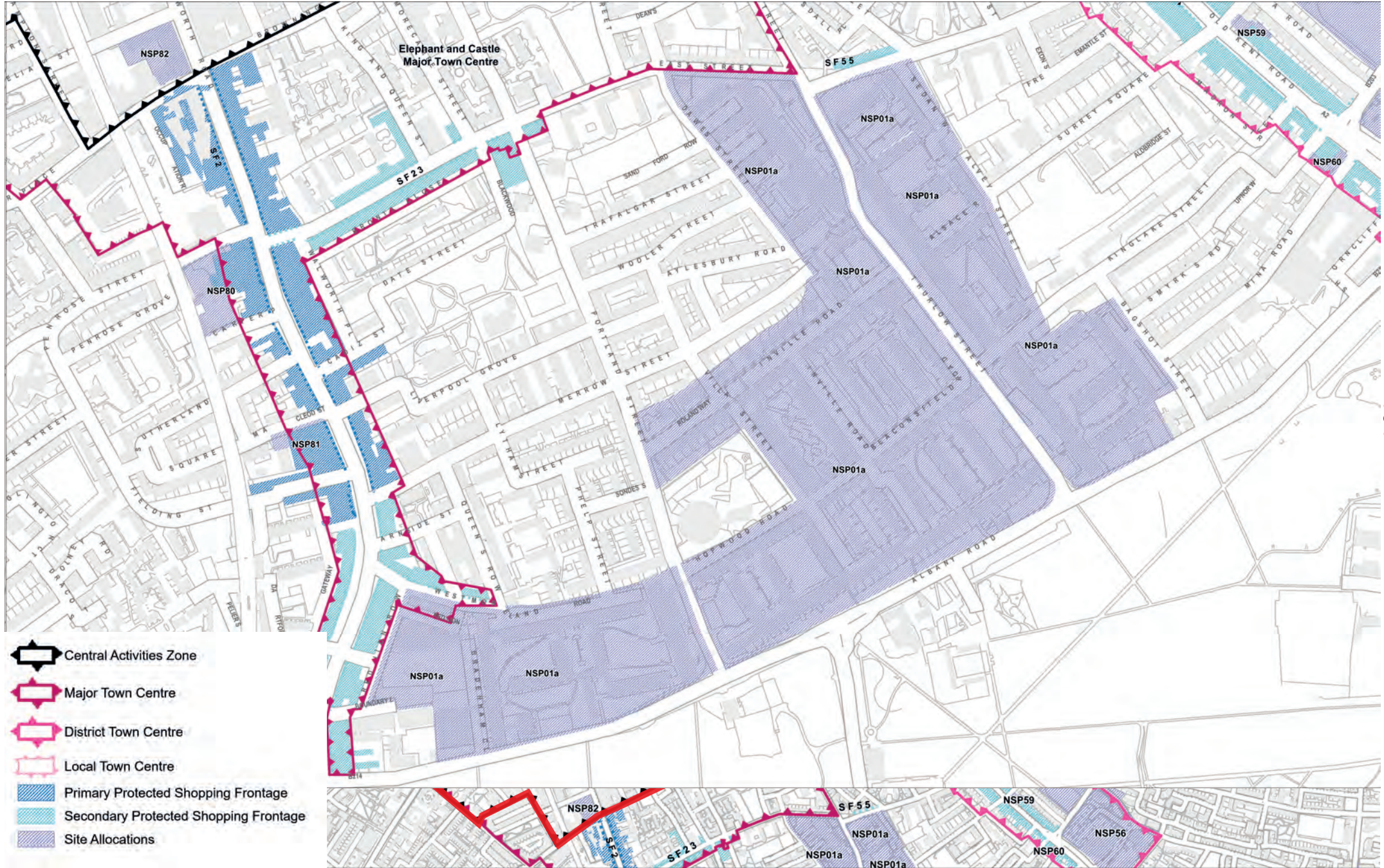


Site Allocation: NSP11 and NSP12 and Secondary Protected Shopping Frontage SF55 Stage: SF16 and SF17

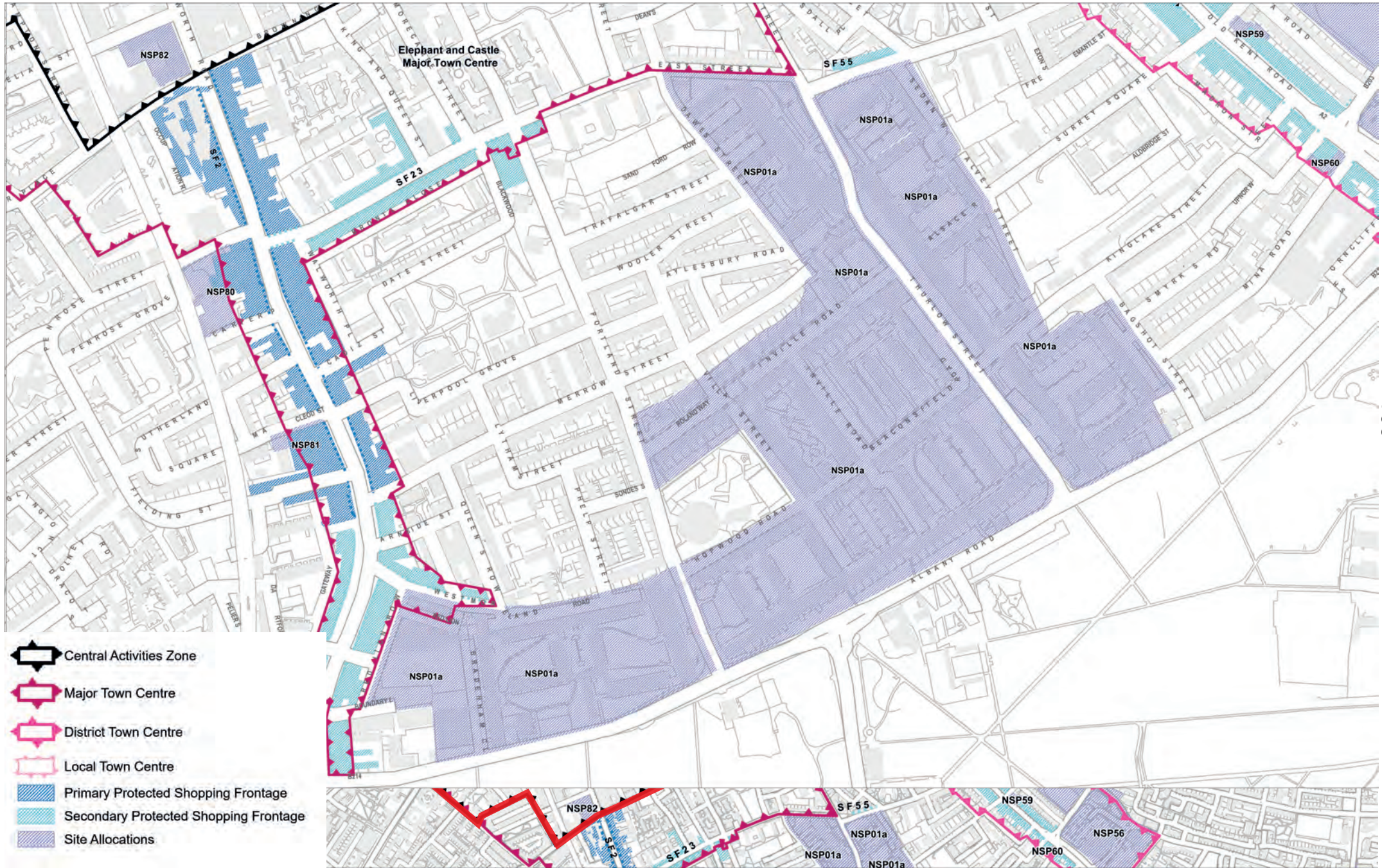


-  Central Activities Zone
-  Major Town Centre
-  District Town Centre
-  Local Town Centre
-  Primary Protected Shopping Frontage
-  Secondary Protected Shopping Frontage
-  Site Allocations

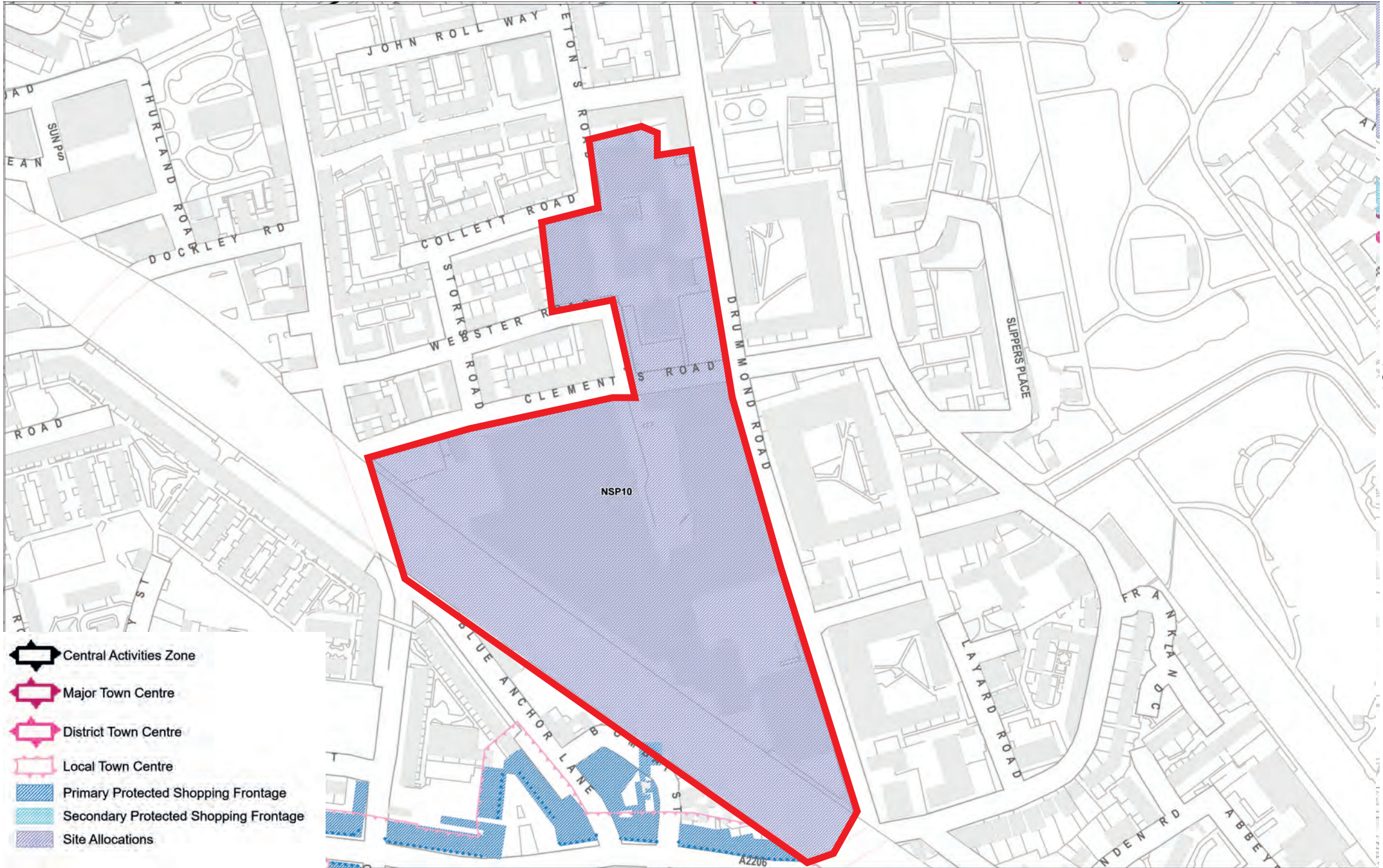
Site Allocations NSP01a (GAD) Secondary Protected Shopping Frontage: SF55



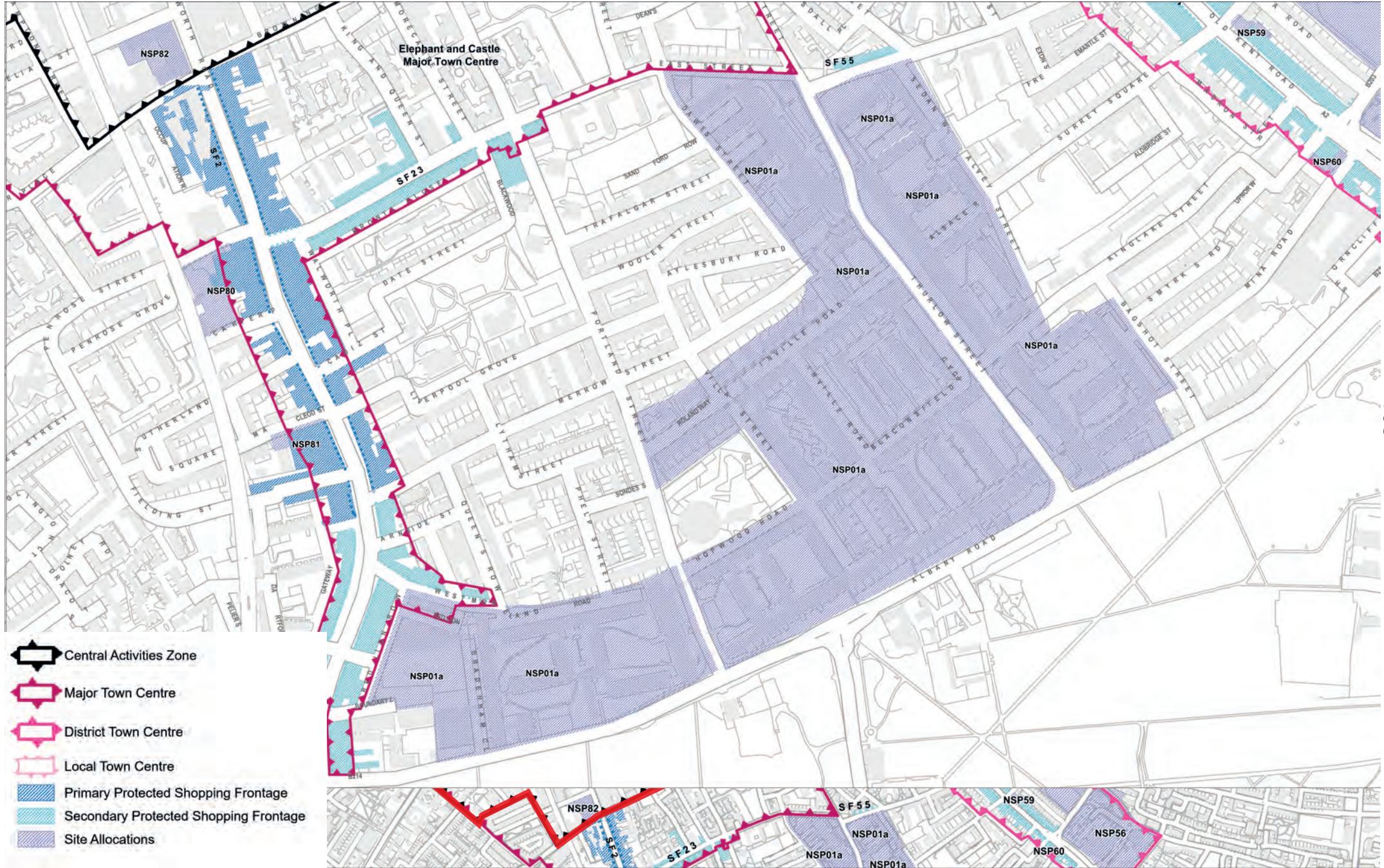
Site Allocations NSP01a (GAD) Secondary Protected Shopping Frontage: SF55



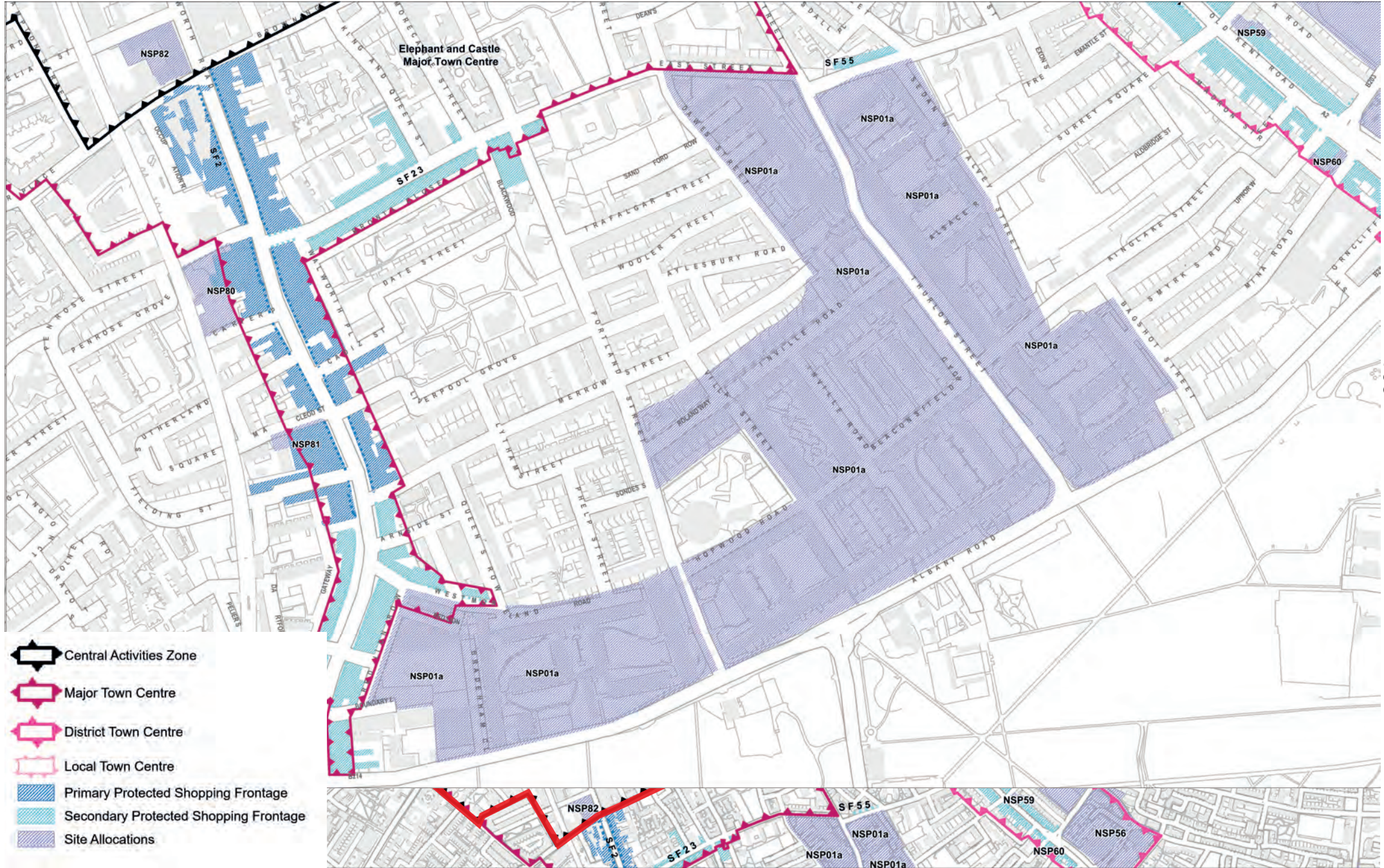
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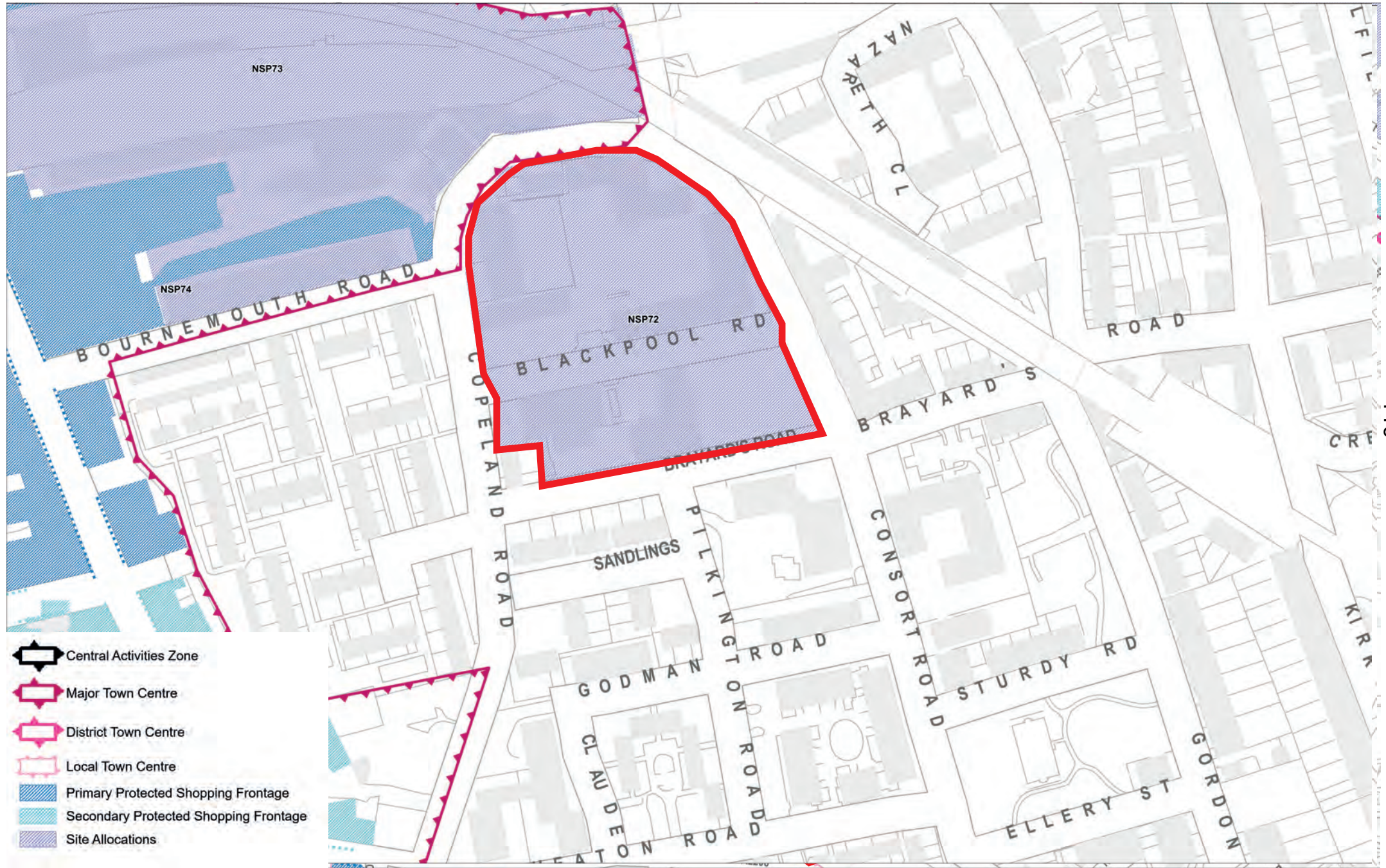
Site Allocations NSP01a (GAD) Secondary Protected Shopping Frontage: SF55



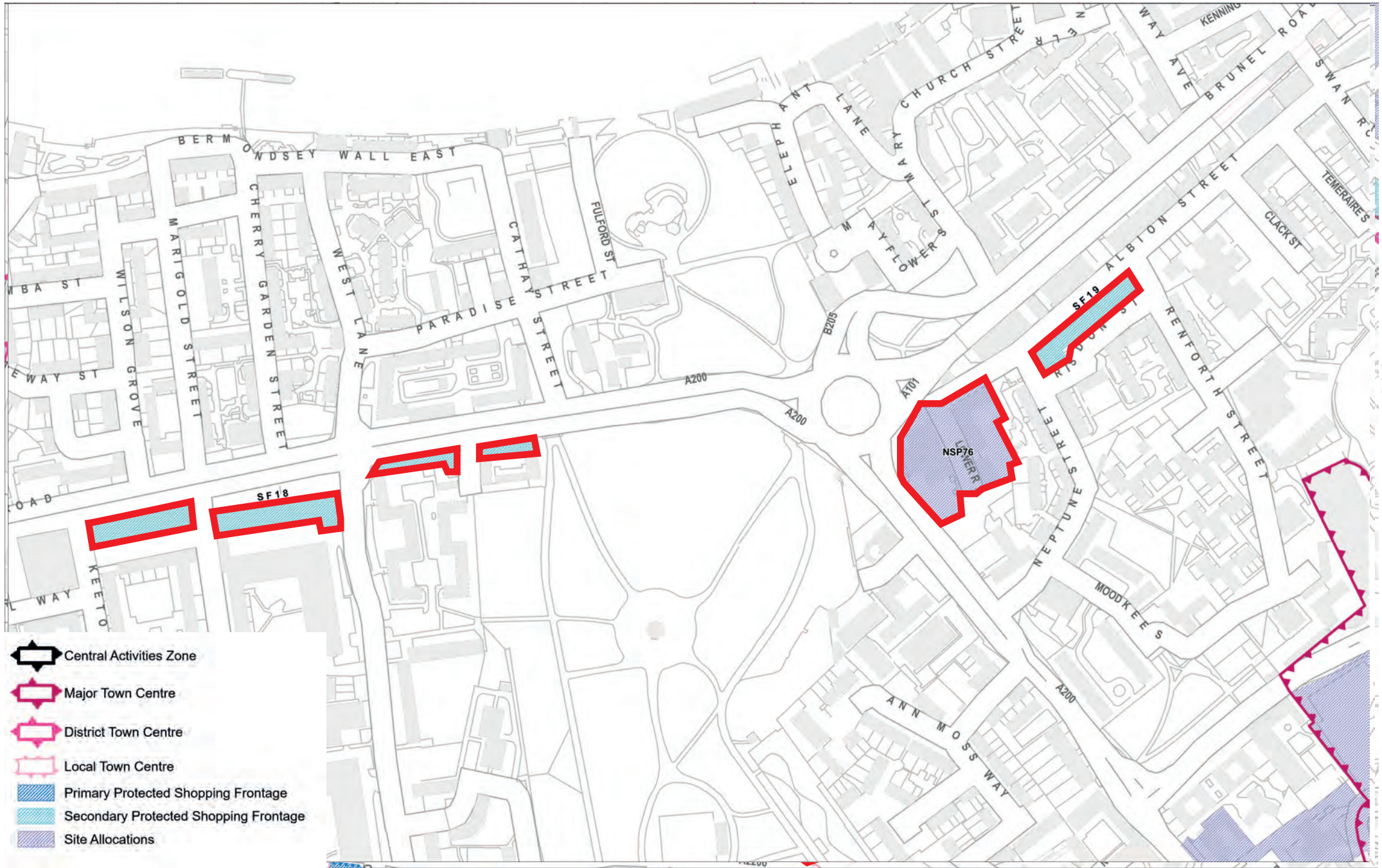
Site Allocation NSP01a (GAD) Secondary Protected Shopping Frontage: SF55



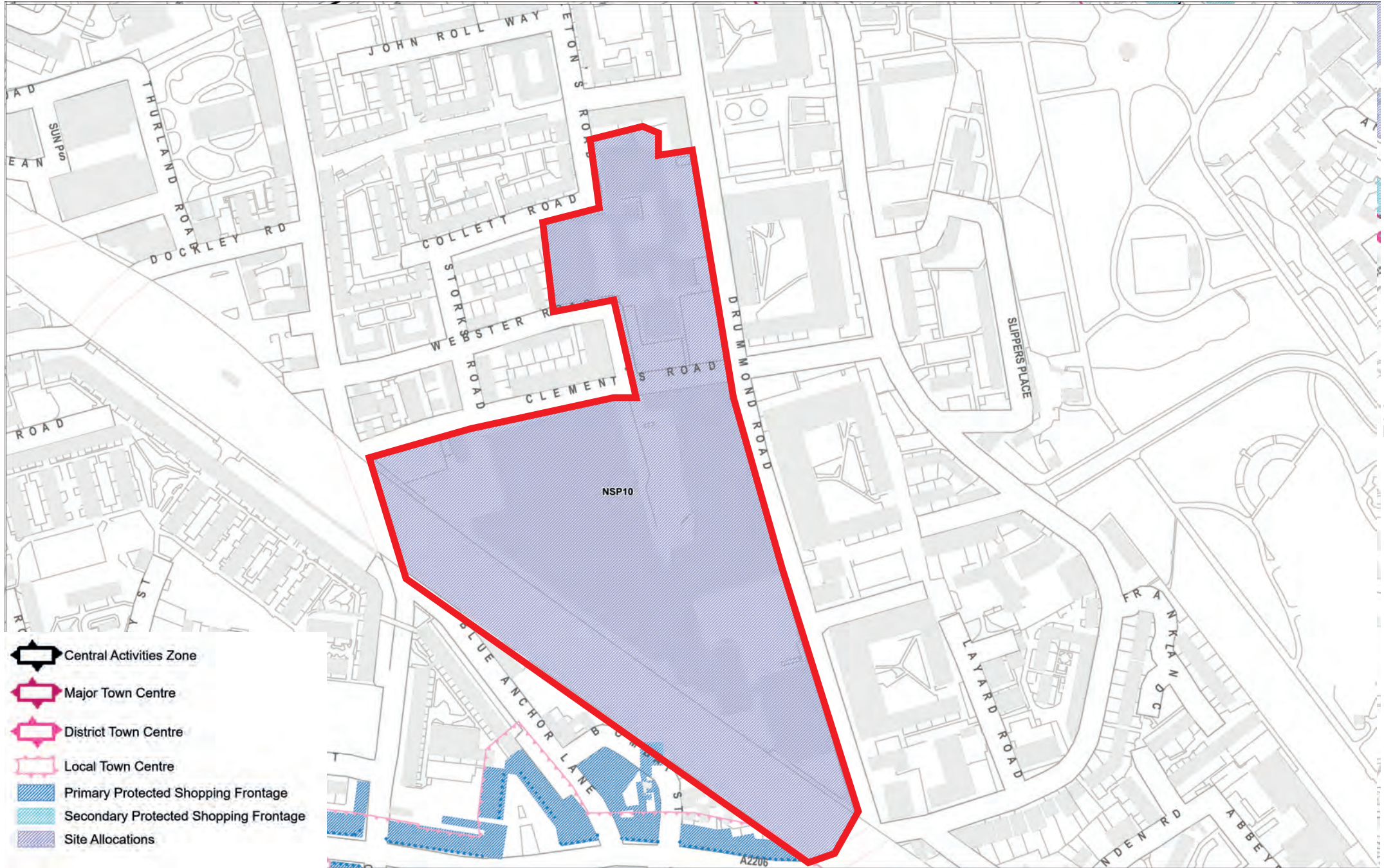
Site Allocation NSP05 (6) Formerly Protected Shopping Frontage SF55 Street Level View of Shopping Frontage and Secondary Protected Shopping Frontage: SF16 and SF17



Site Allocation: NSP76 and Secondary Protected Shopping Frontages SF15, SF16 and SF17



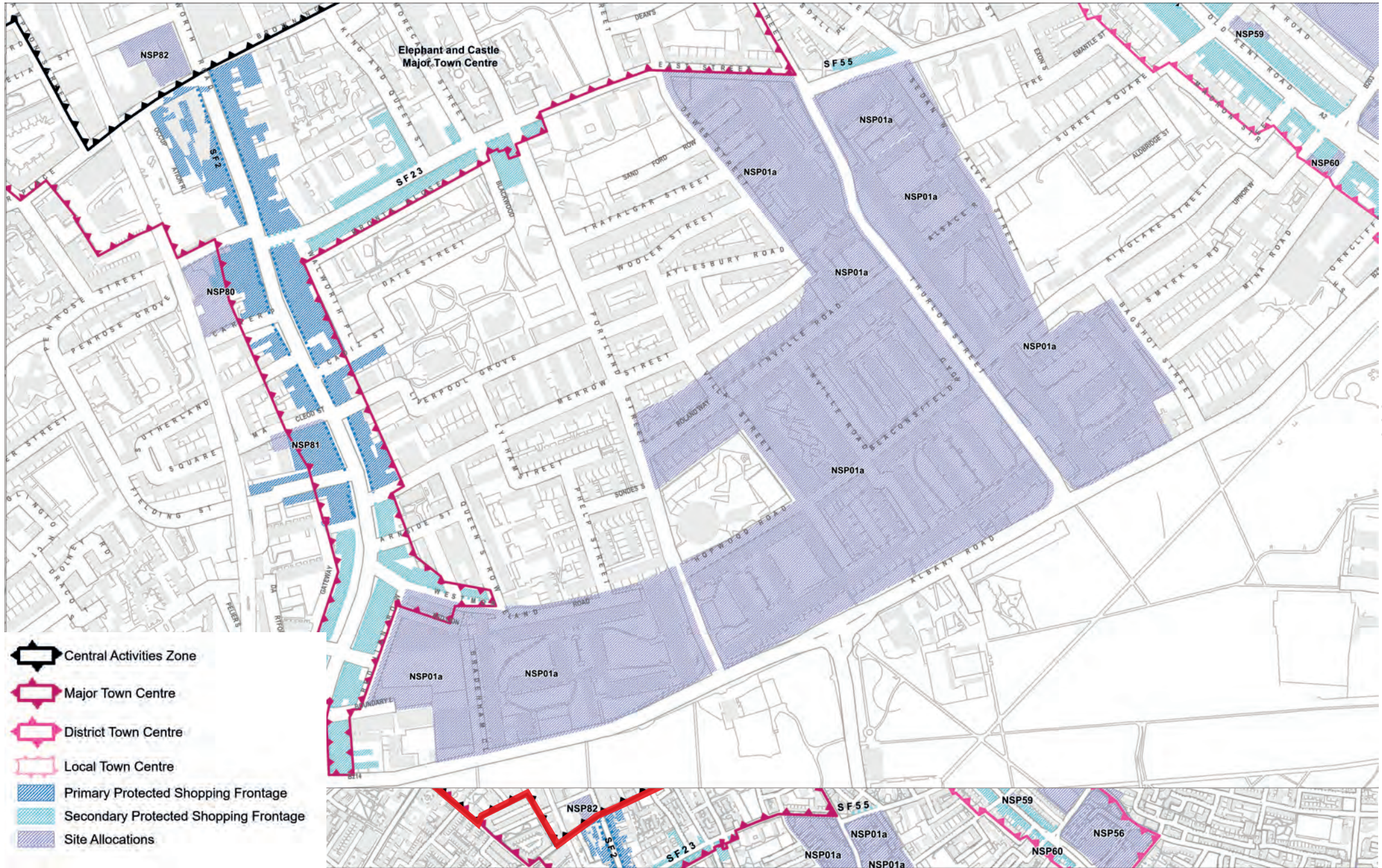
Site Allocation NSP10 (A2) Secondary Protected Shopping Frontage: SF55



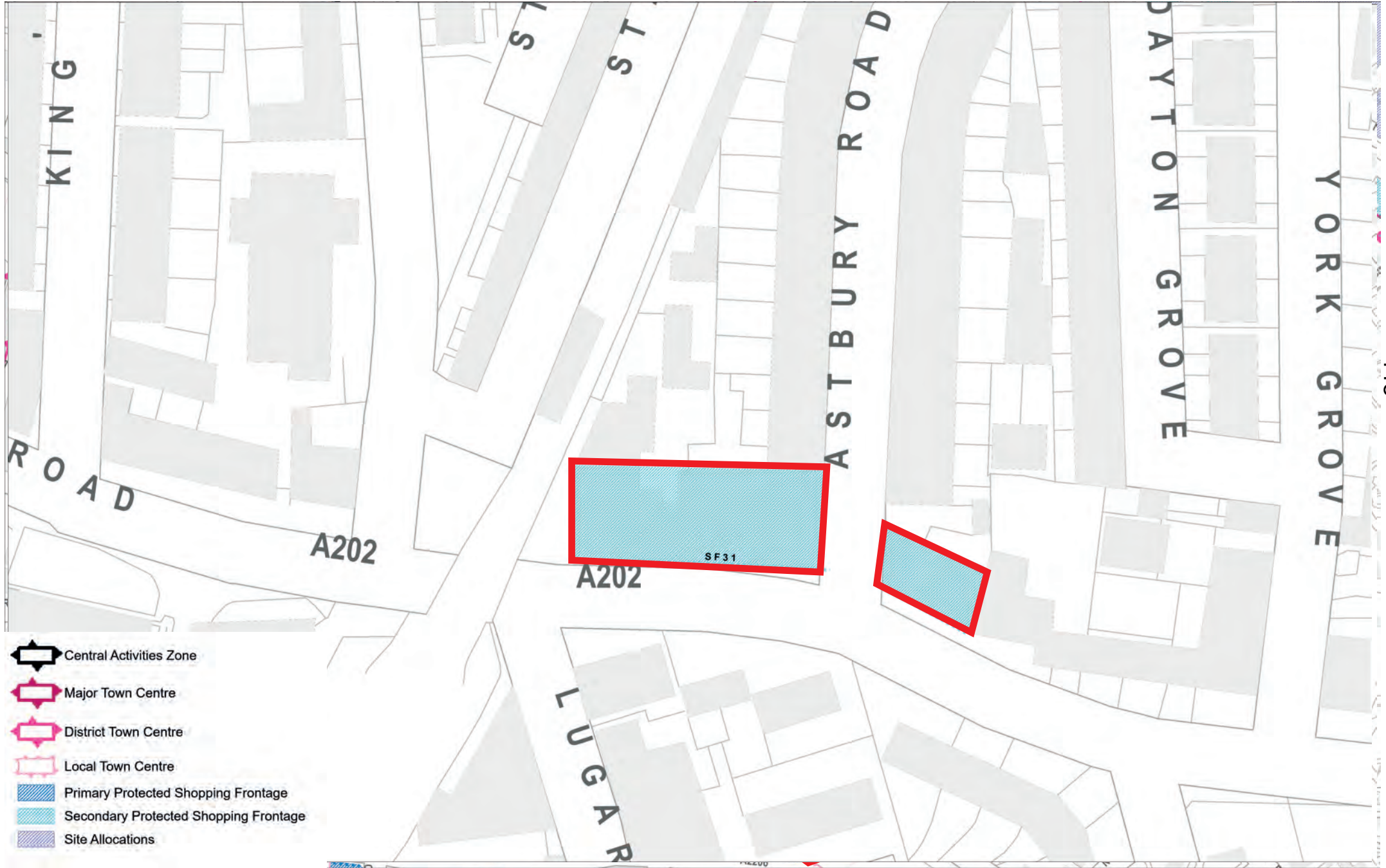
Site Allocation Map (SPOs) for Primary Protected Shopping Frontage, Secondary Protected Shopping Frontage, SF16 and SF17



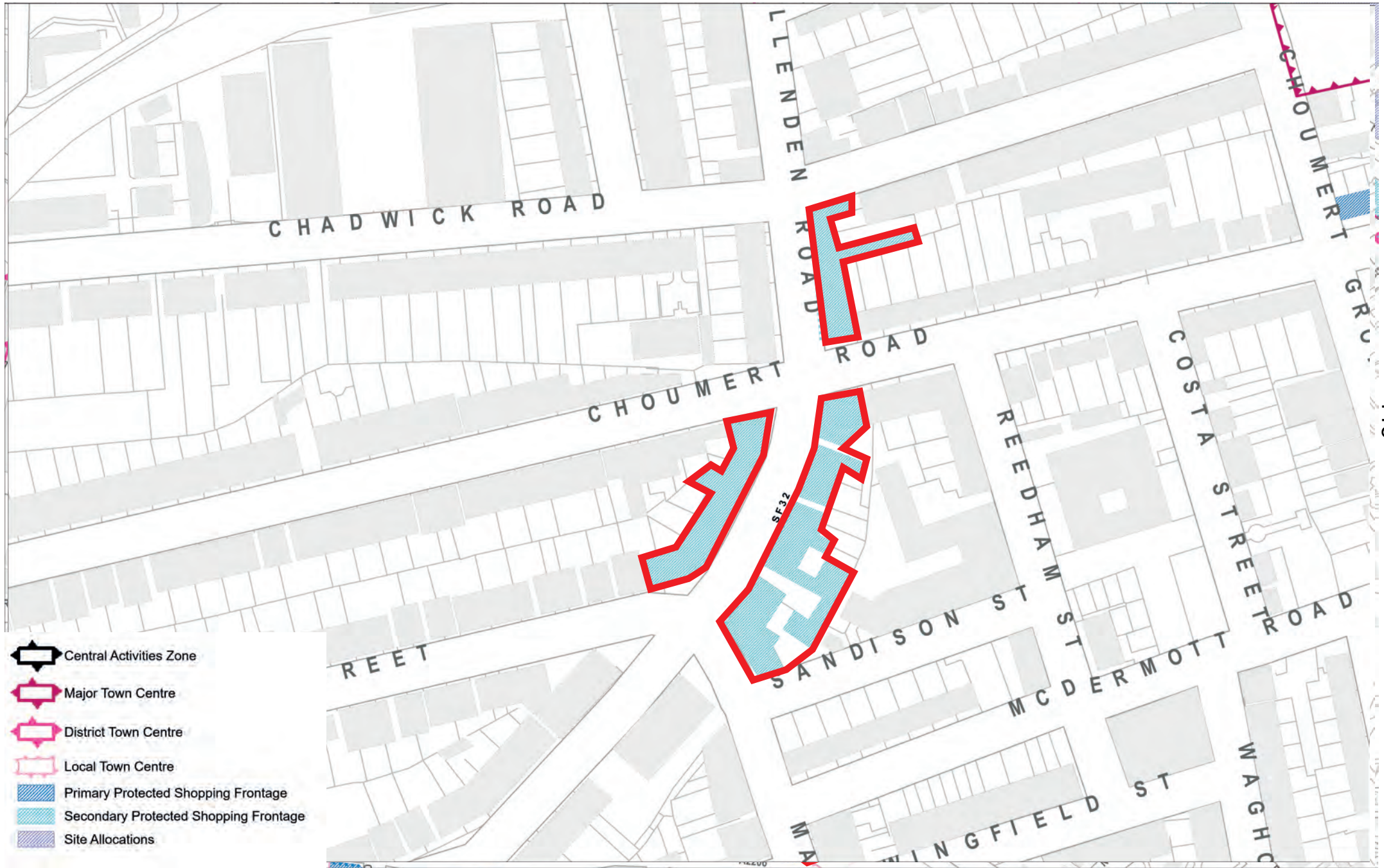
Site Allocation NSP01a (GAD) Secondary Protected Shopping Frontage: SF55



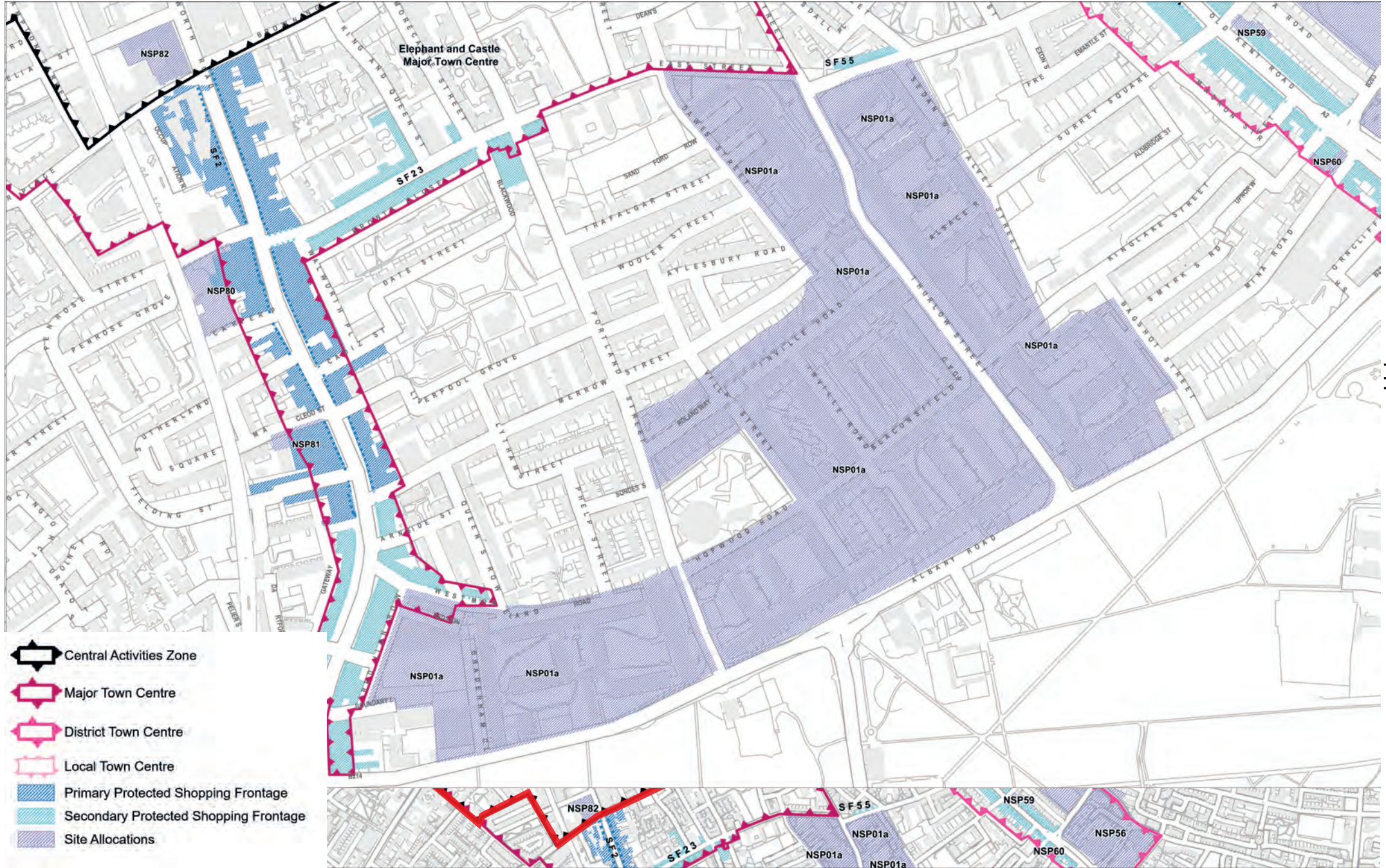
Site Allocation SPD006 (6) - Primary Protected Shopping Frontage, SF55 Secondary Protected Shopping Frontage, SF16 and SF17



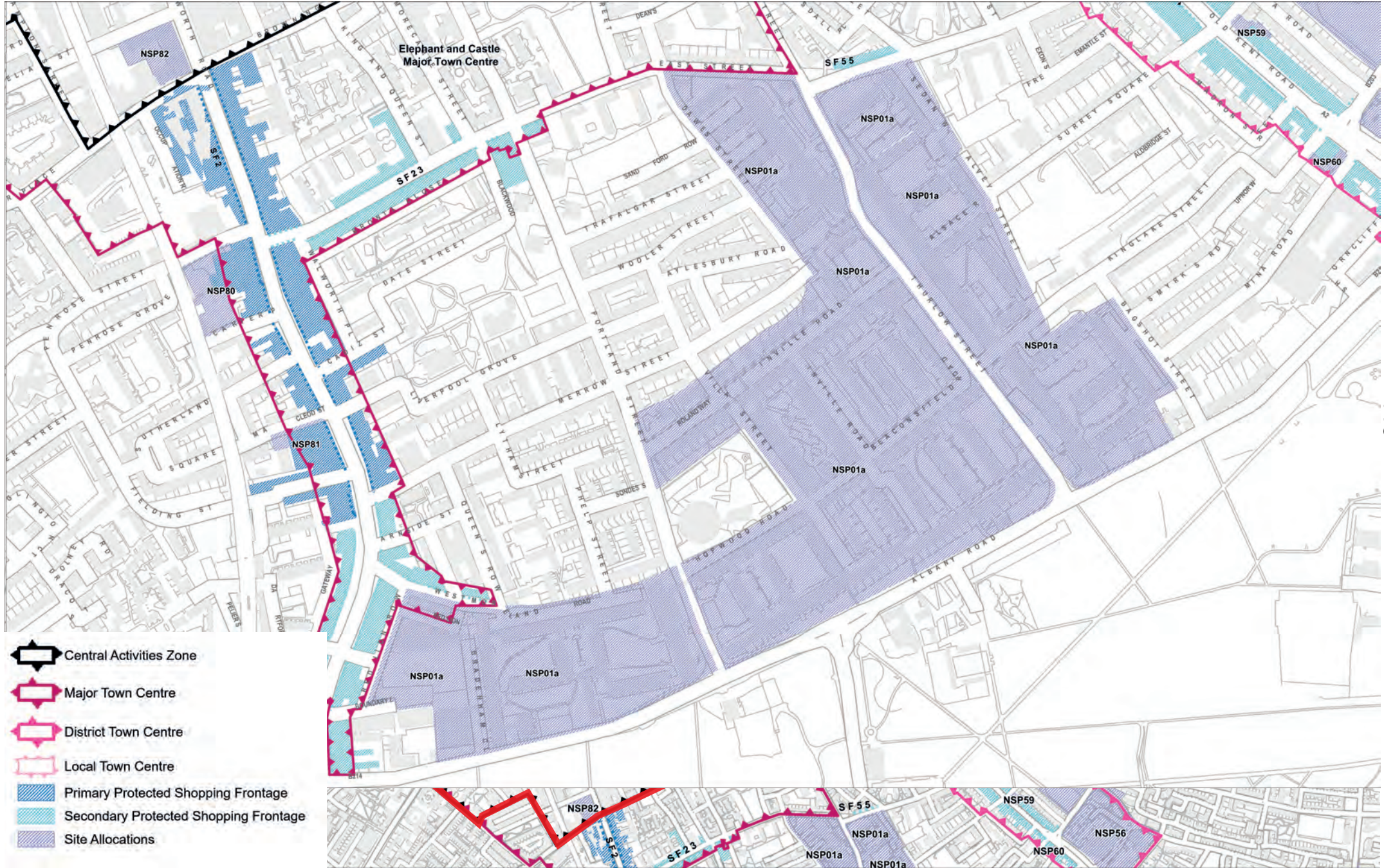
Site Allocation in SP00s (6) for primary Protected Shopping Frontage, SF55 Secondary Protected Shopping Frontage: SF16 and SF17



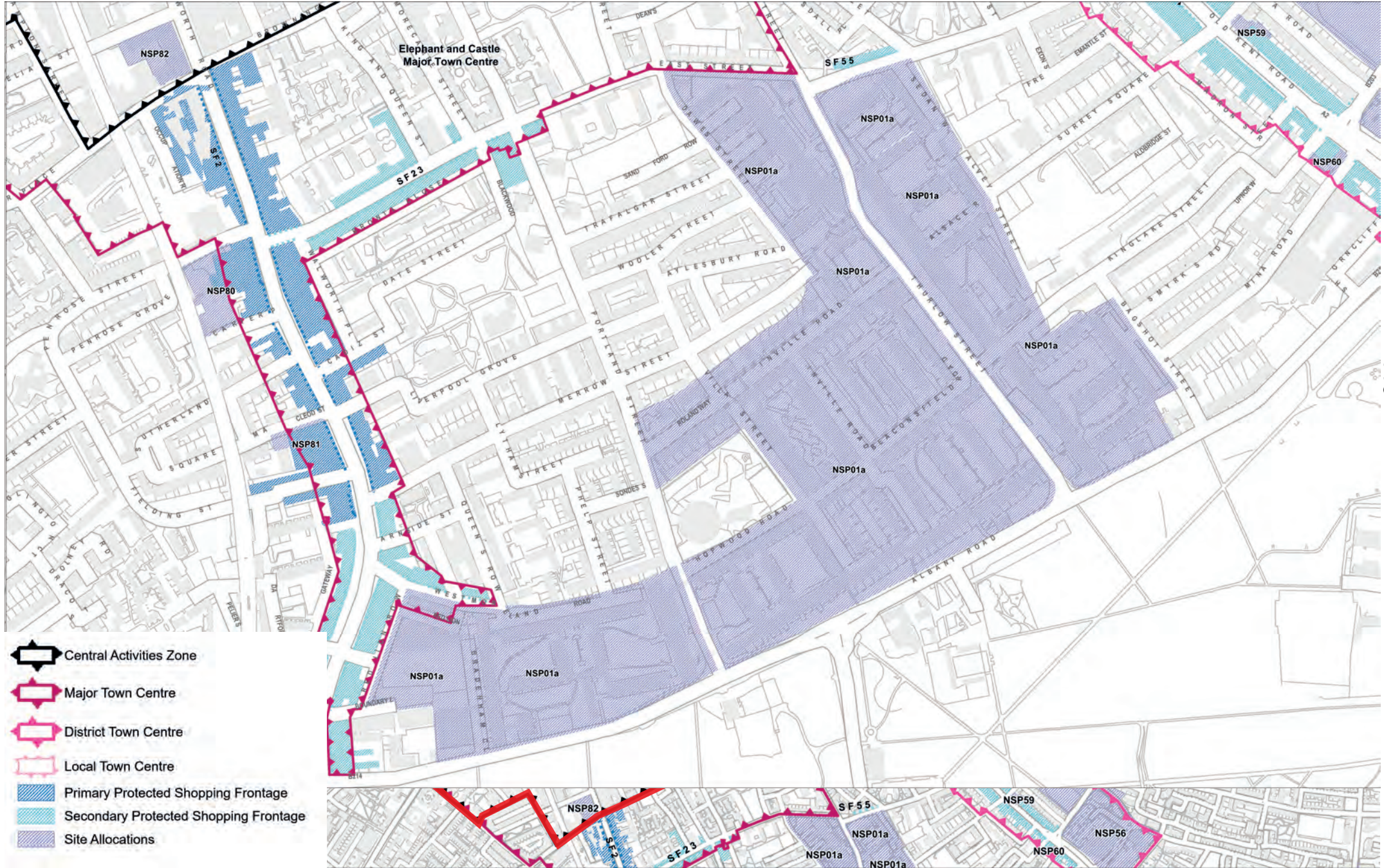
Site Allocations NSP01a (GAD) Secondary Protected Shopping Frontage: SF55



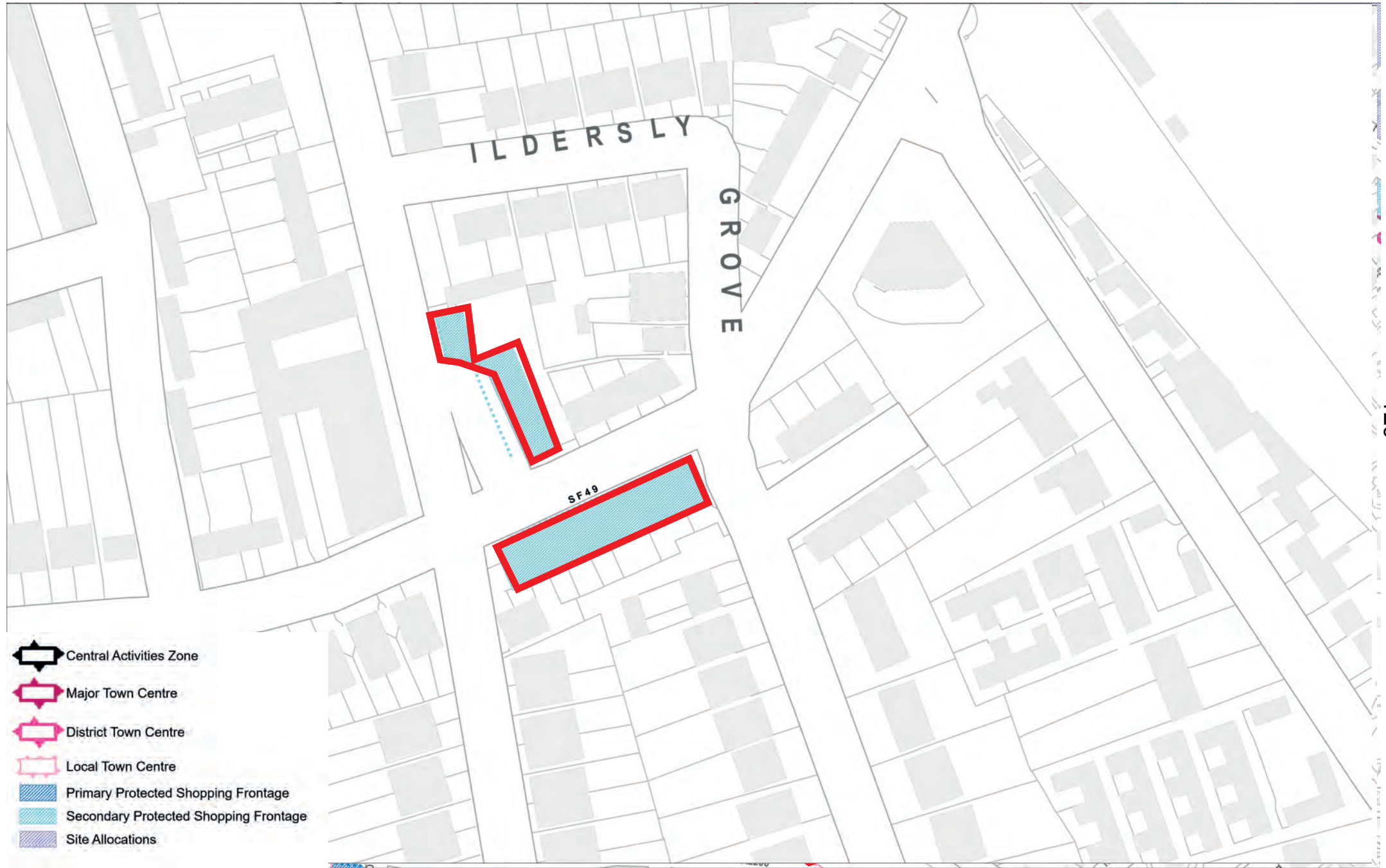
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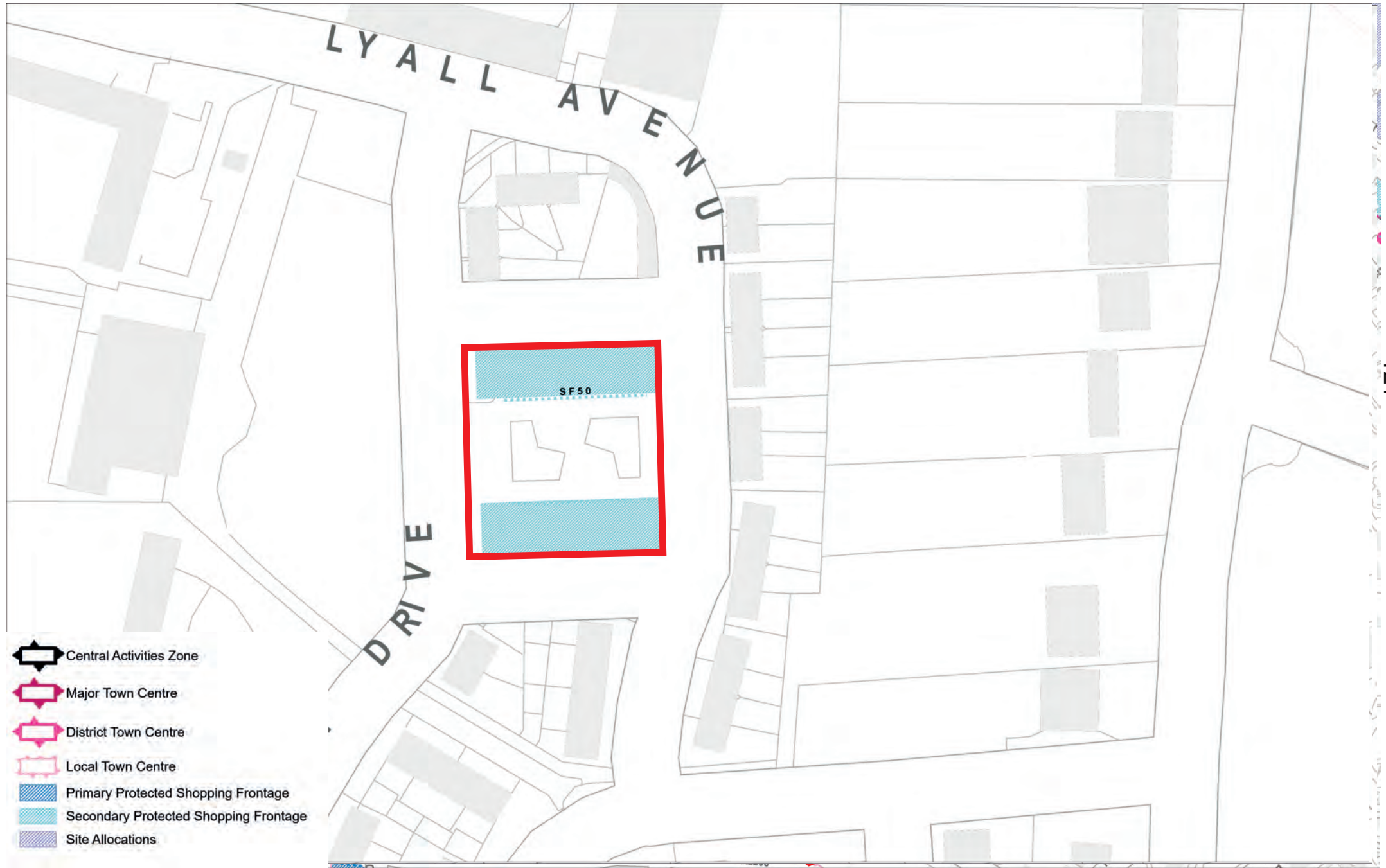
Site Allocations NSP01a (GAD) Secondary Protected Shopping Frontage: SF55



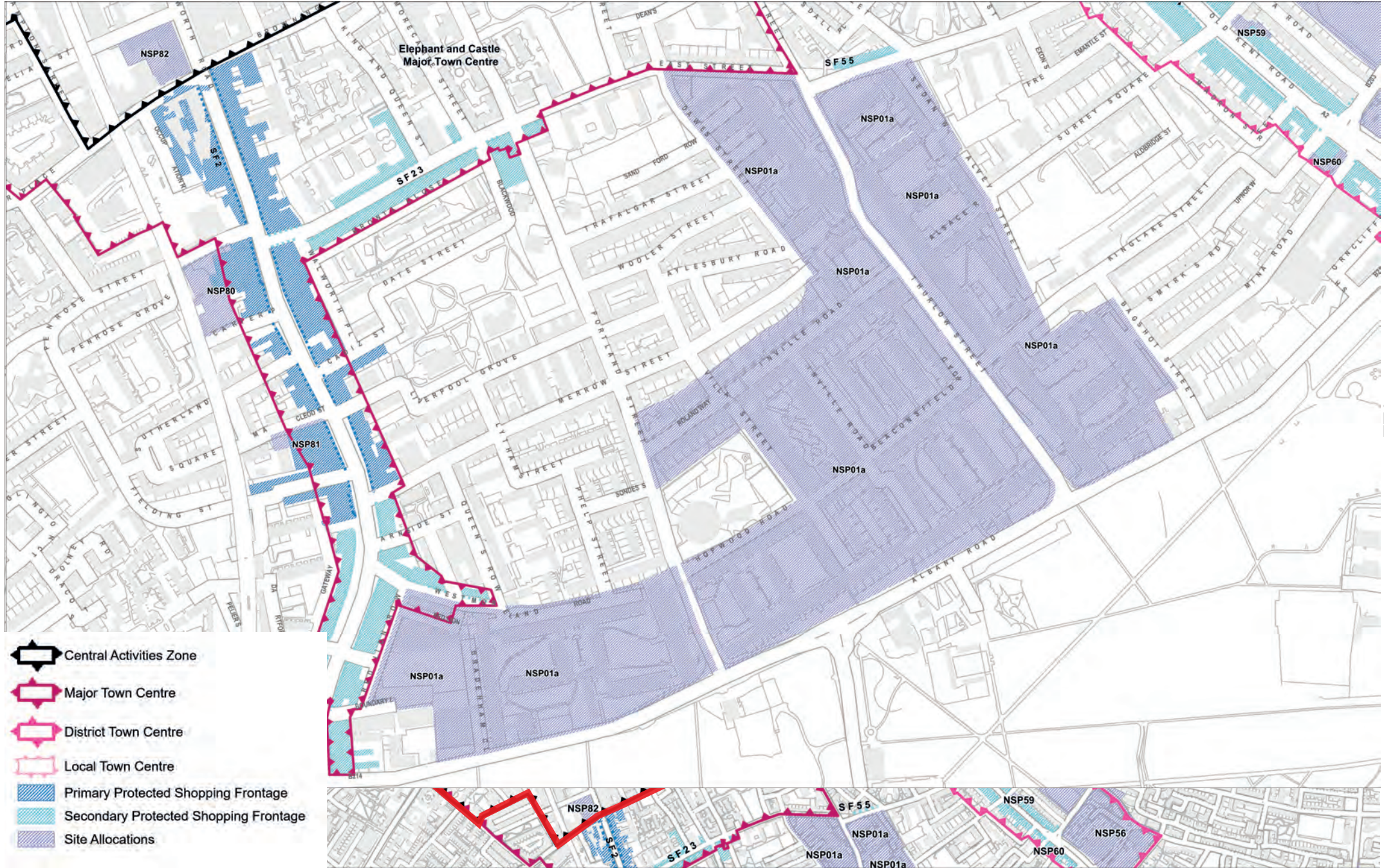
Site Allocation SPDs (6) - Primary Protected Shopping Frontage, Secondary Protected Shopping Frontage: SF16 and SF17



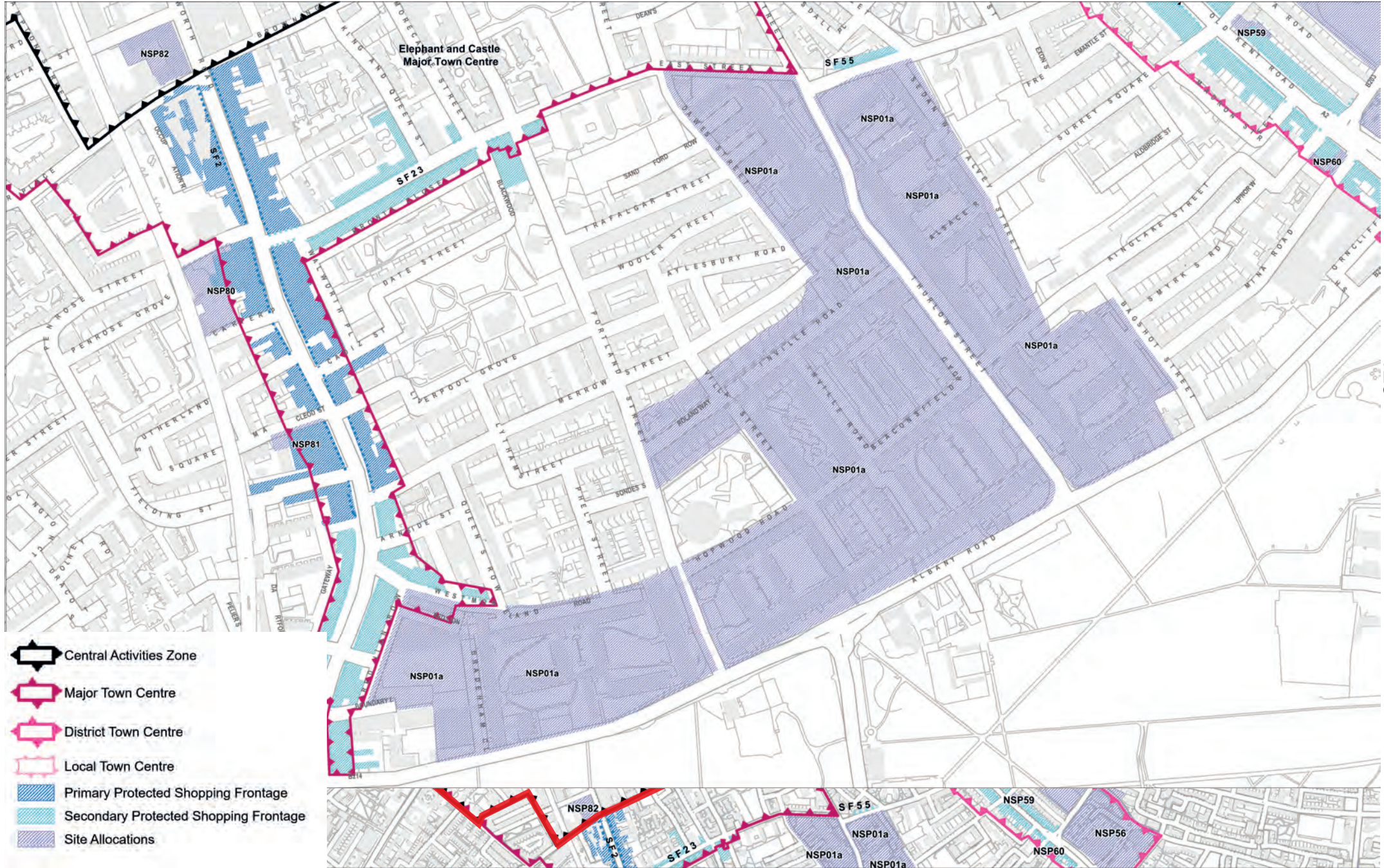
Site Allocation SPD006 (6) - Primary Protected Shopping Frontage, SF50 Secondary Protected Shopping Frontage: SF16 and SF17



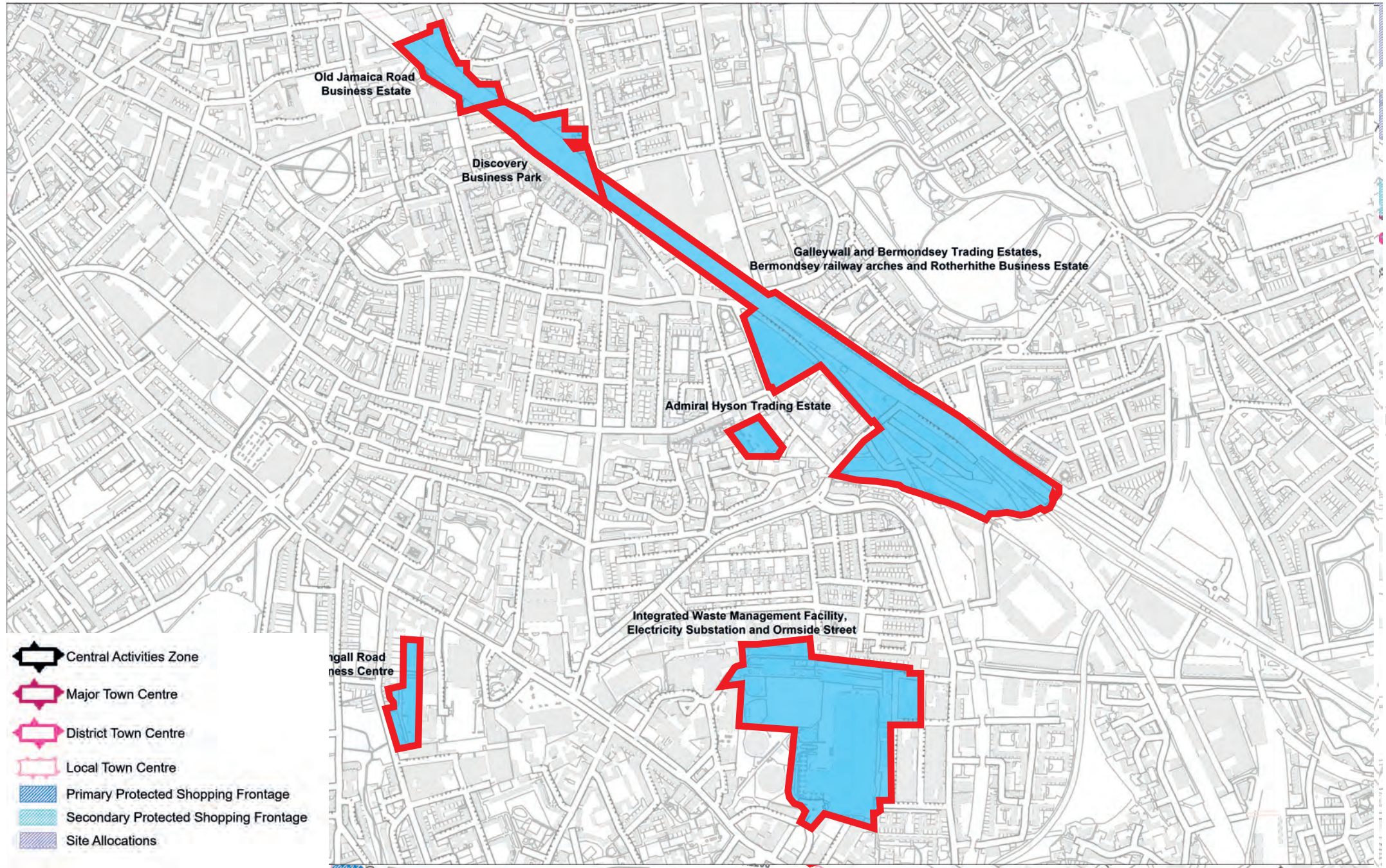
Site Allocations NSP01a (GAD) Secondary Protected Shopping Frontage: SF55



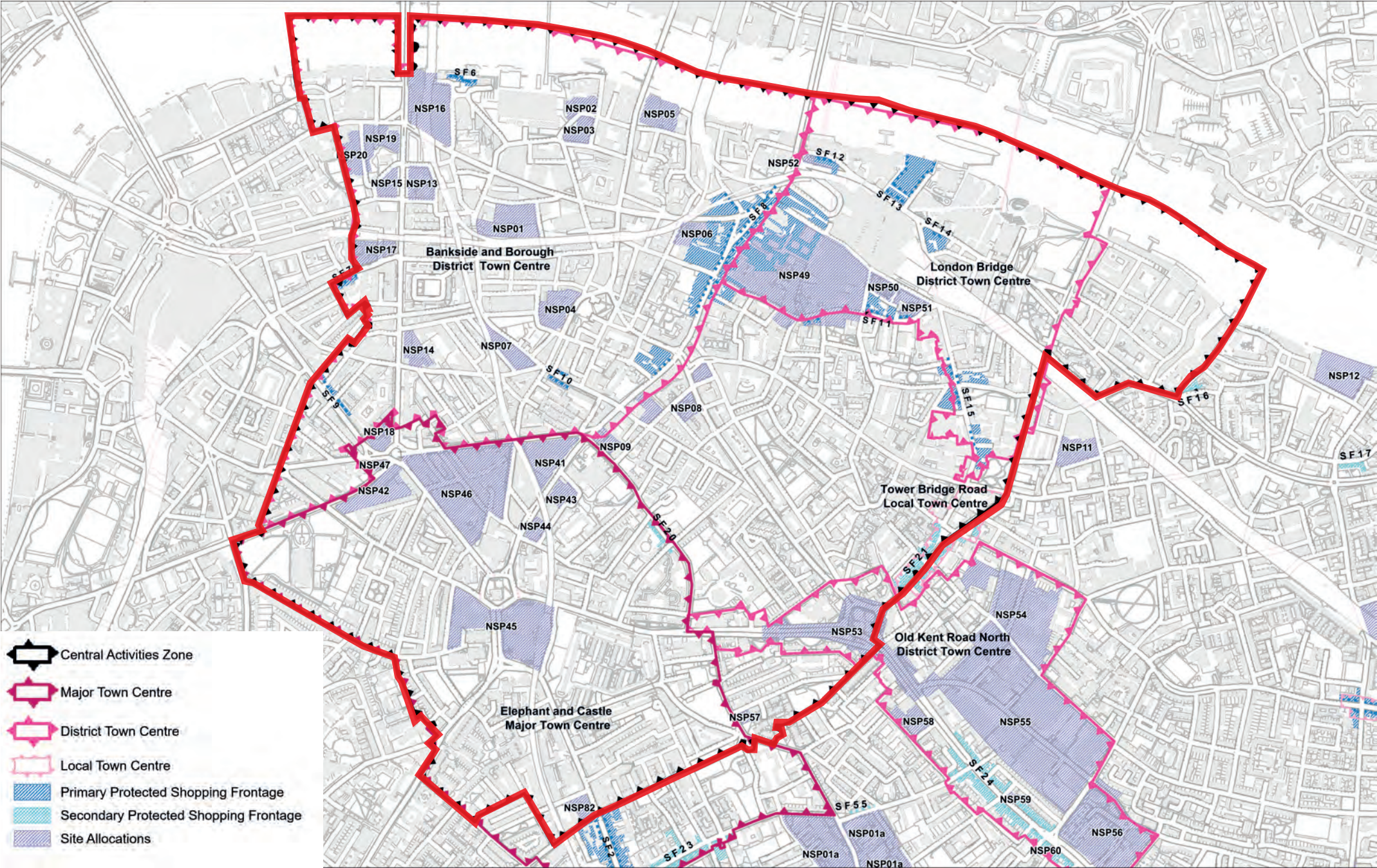
Site Allocations NSP01a (GAD) Secondary Protected Shopping Frontage: SF55



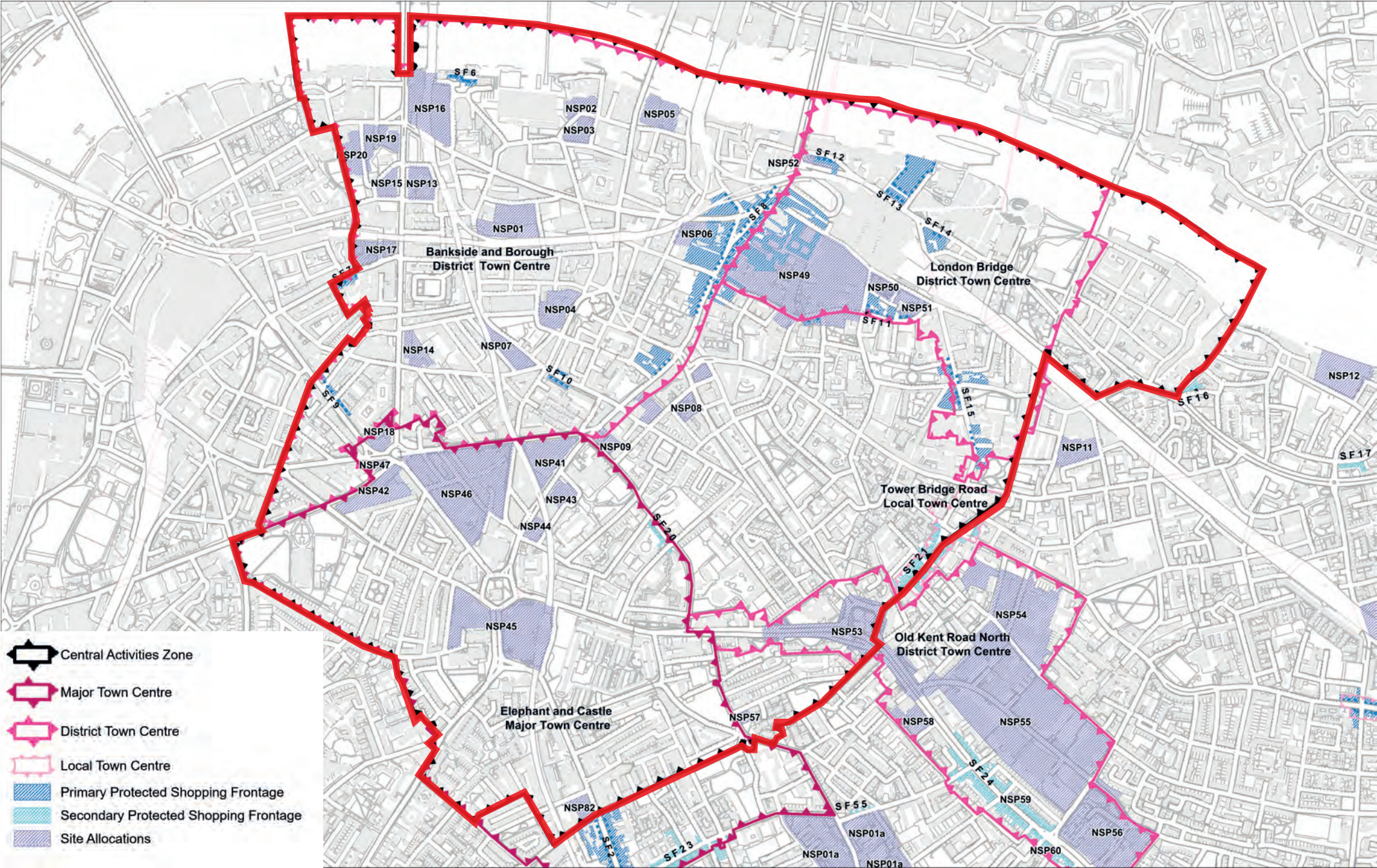
Street Allocation SPD (6) - Regularly Protected Shopping Frontage: SF55 Stage: SF16 and SF17



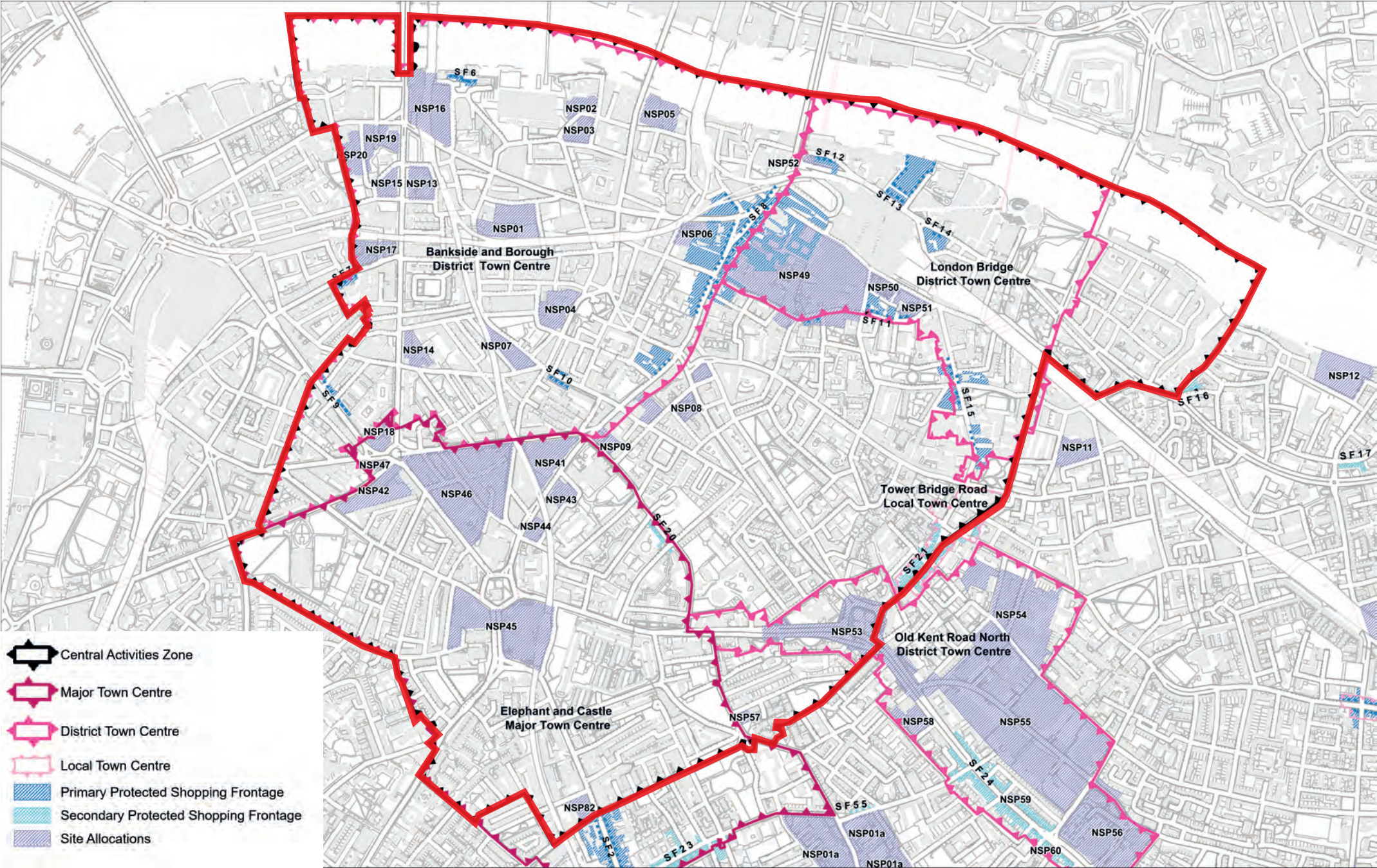
Central Activities Zone (CAZ)



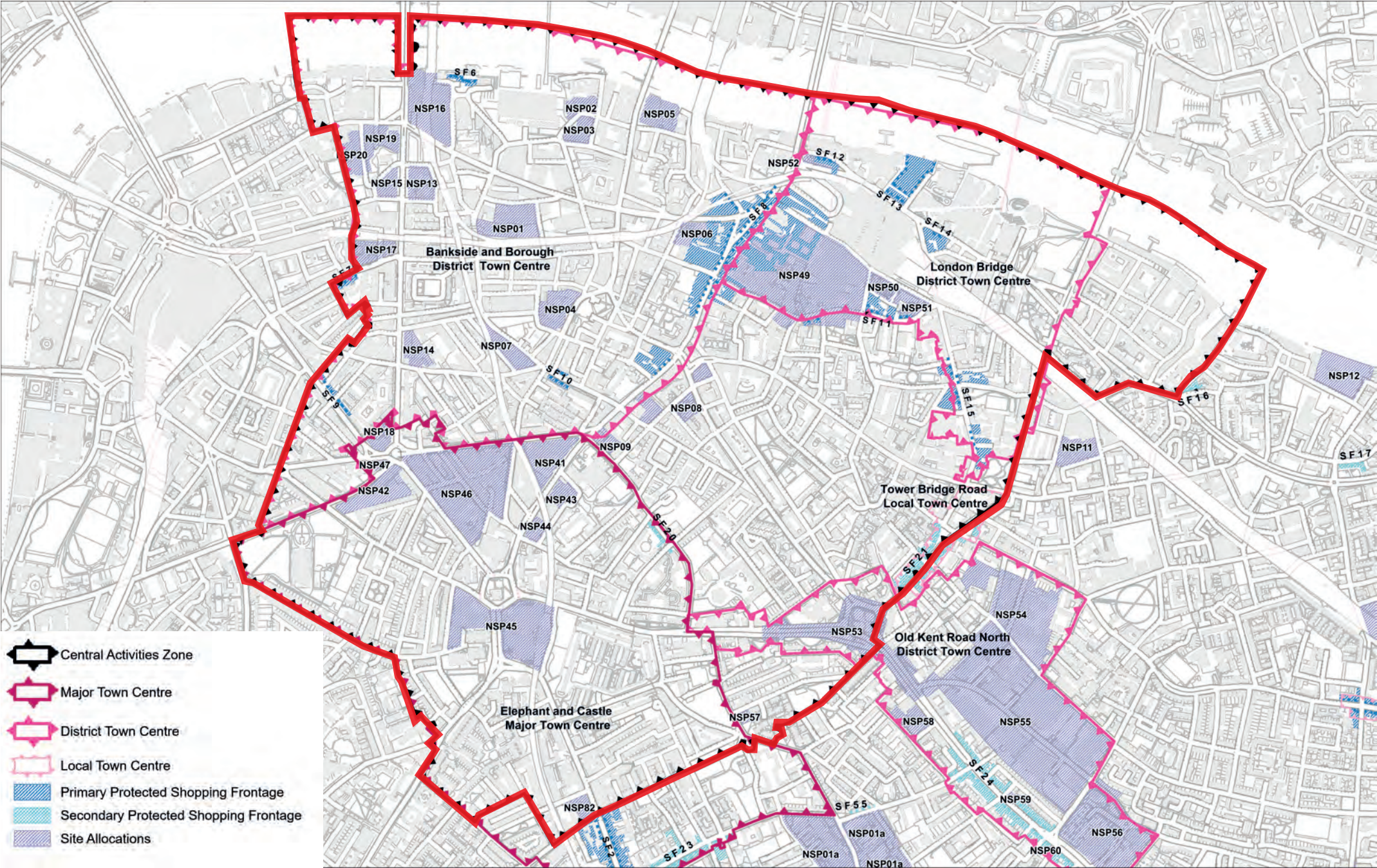
Central Activities Zone (CAZ)



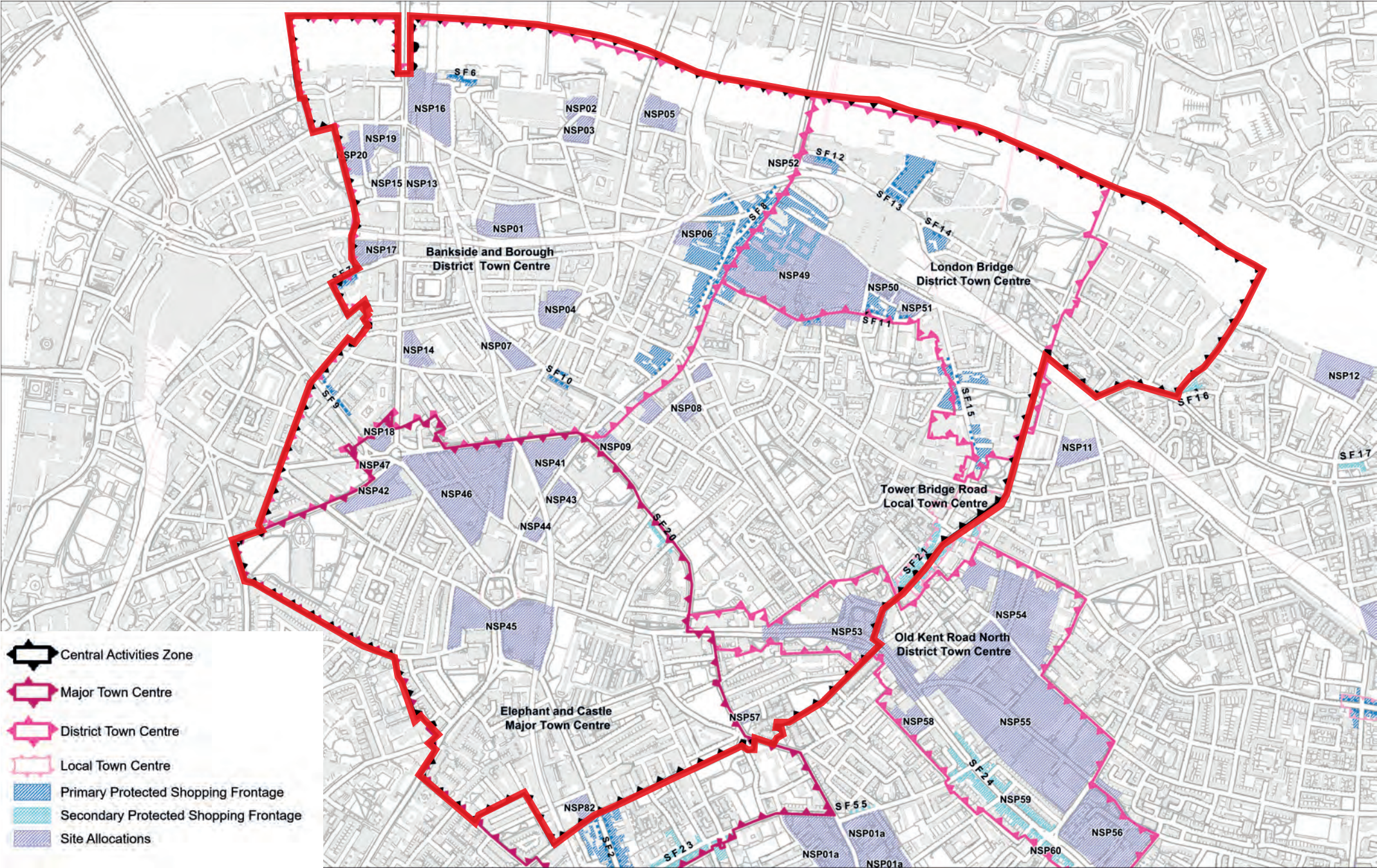
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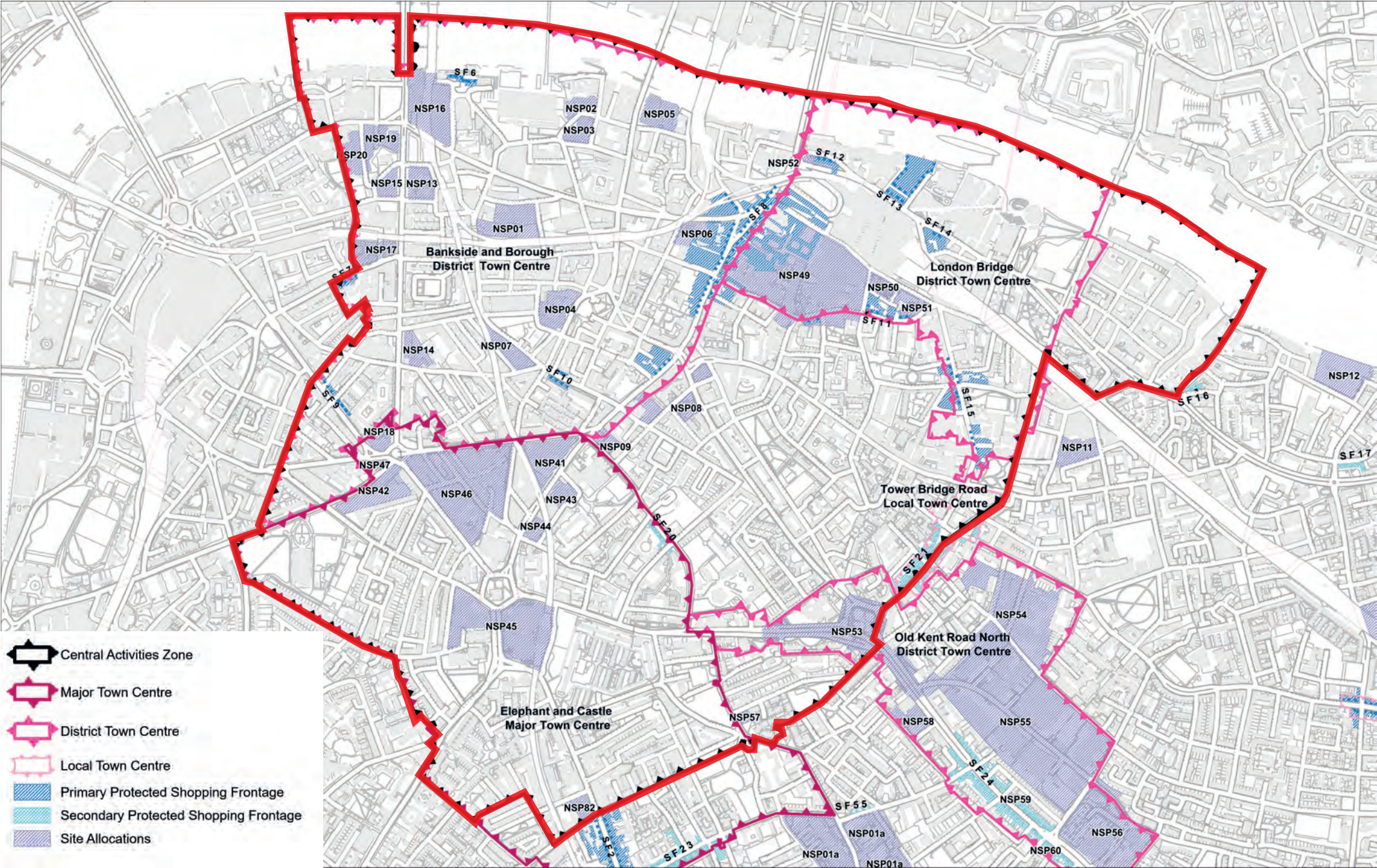
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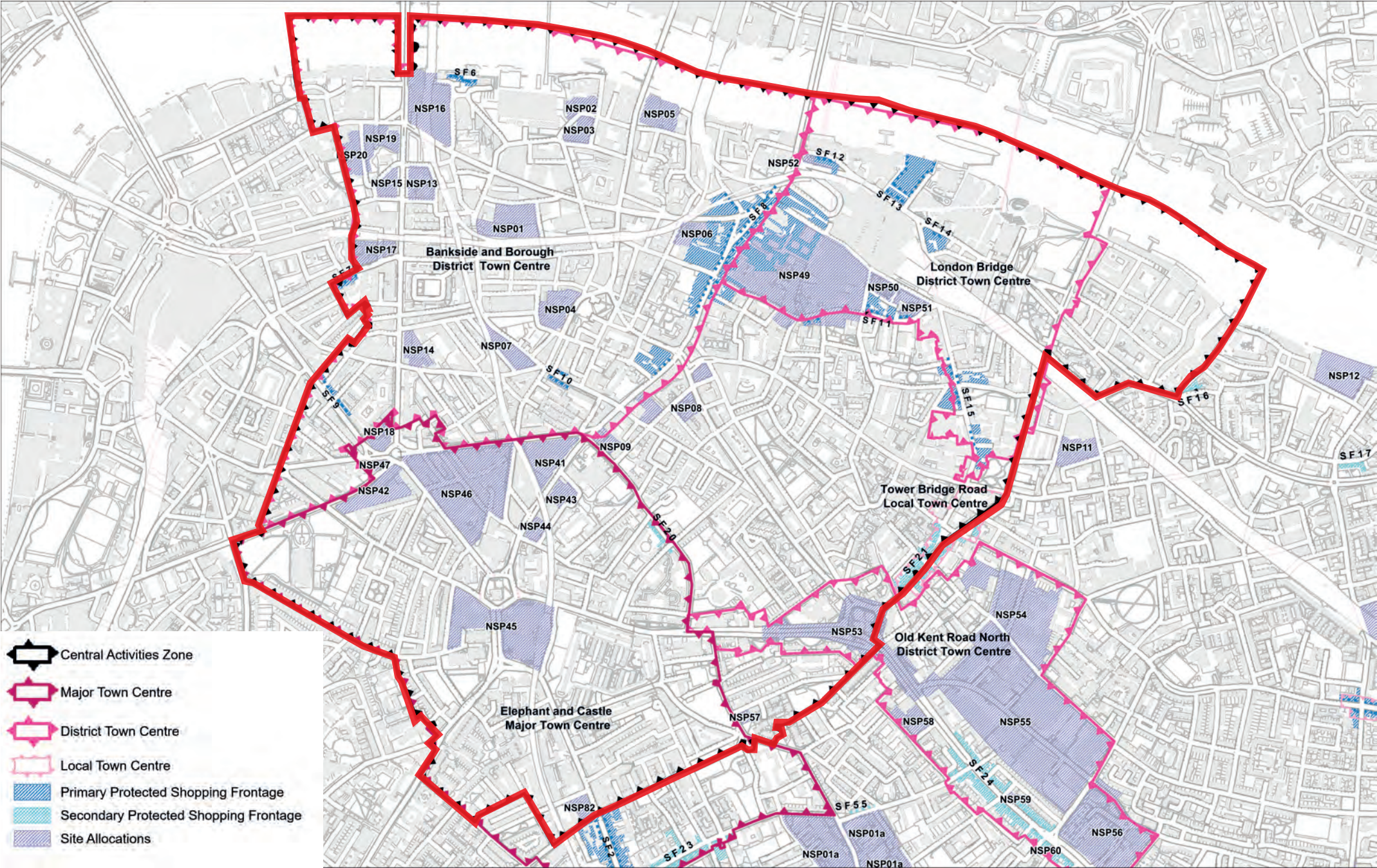
Central Activities Zone (CAZ)



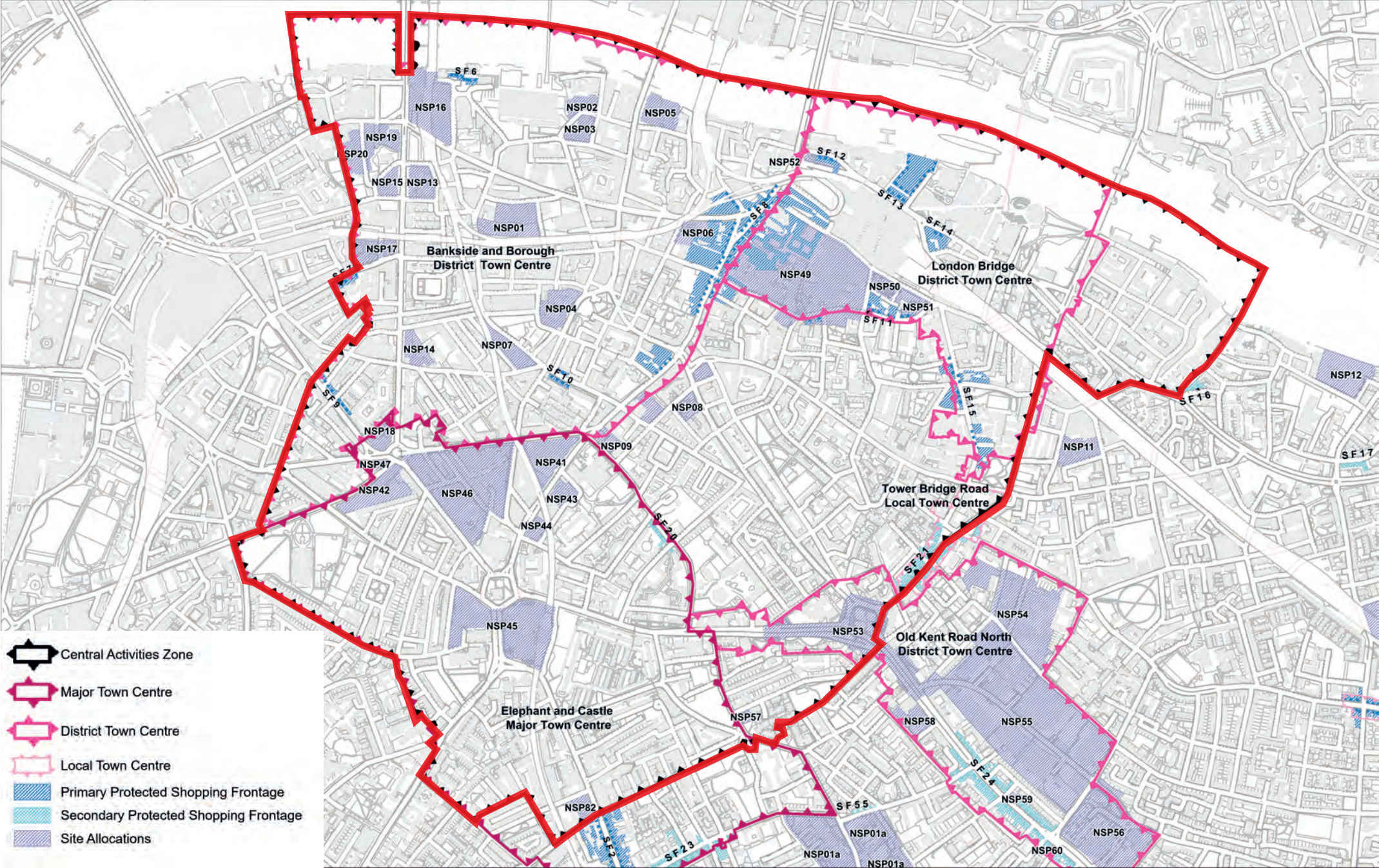
Central Activities Zone (CAZ)



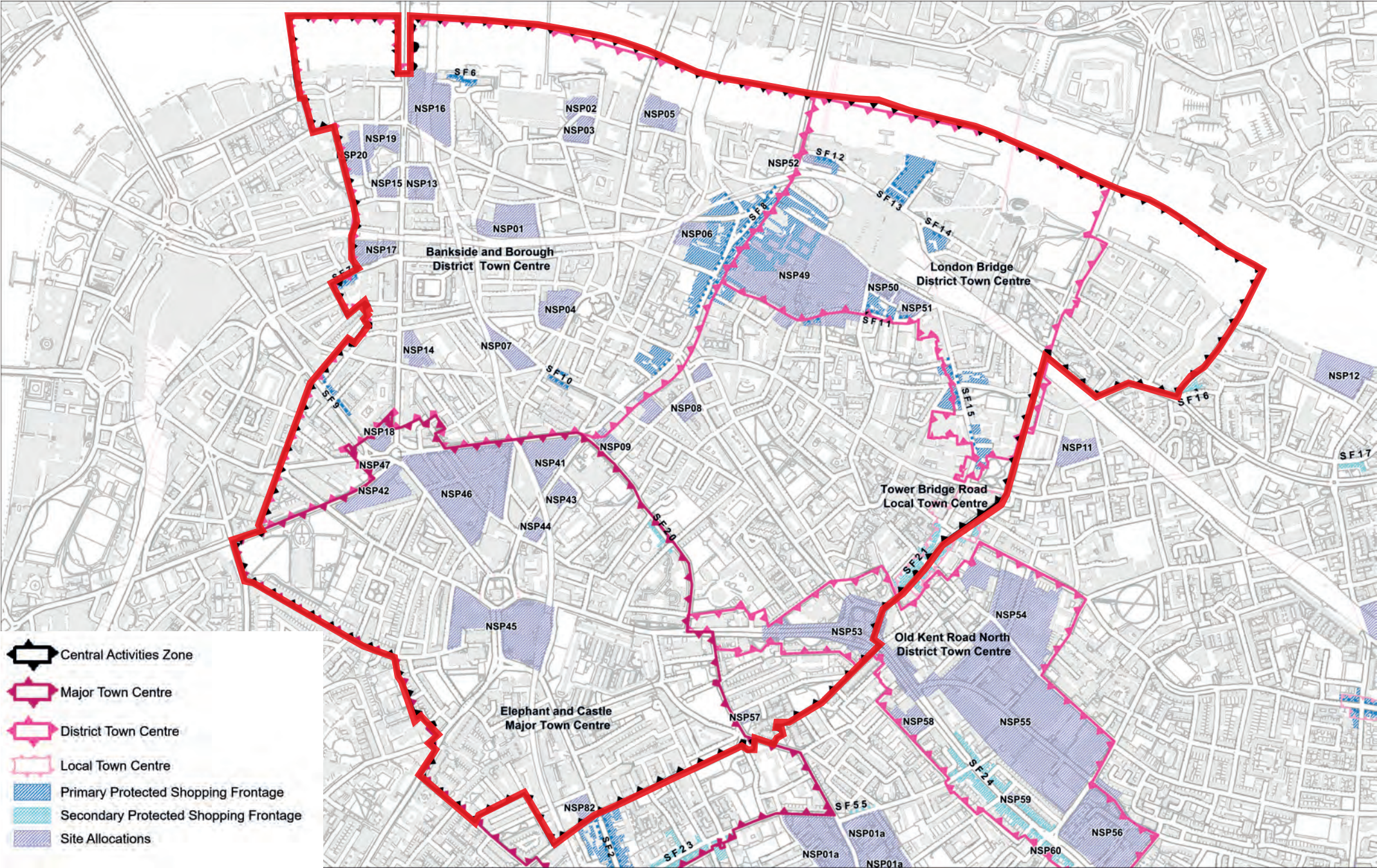
Central Activities Zone (CAZ)

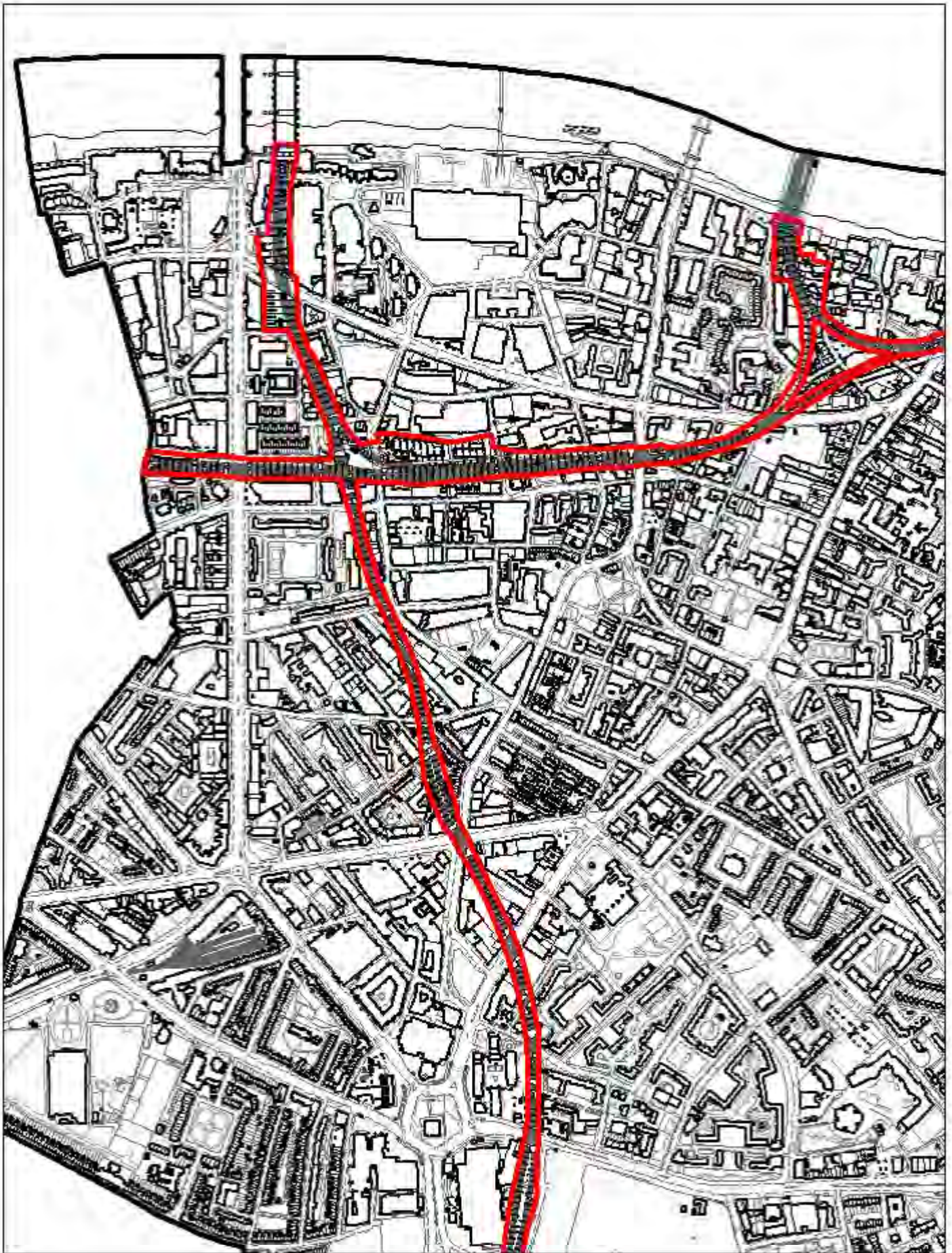


Central Activities Zone (CAZ)

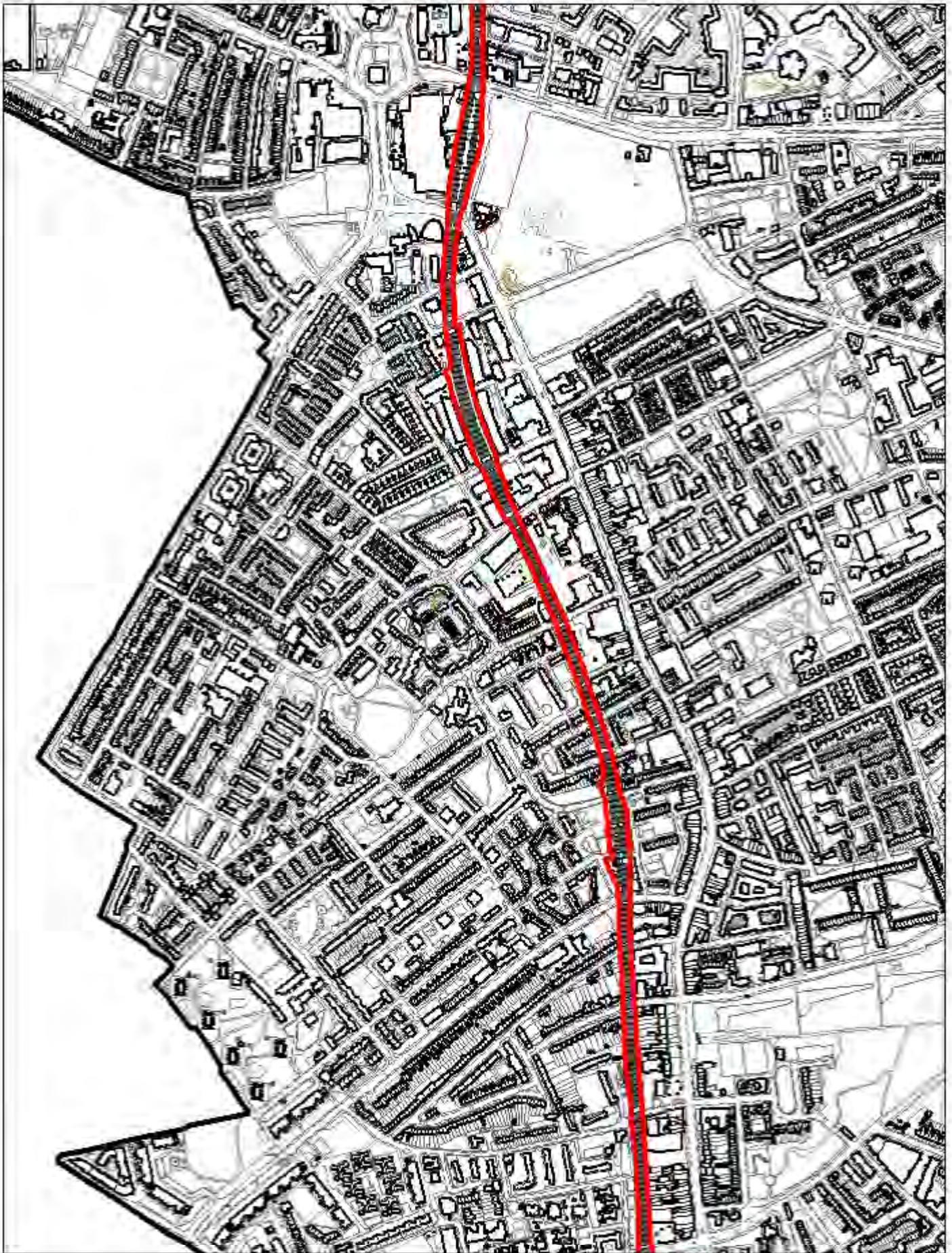


Central Activities Zone (CAZ)

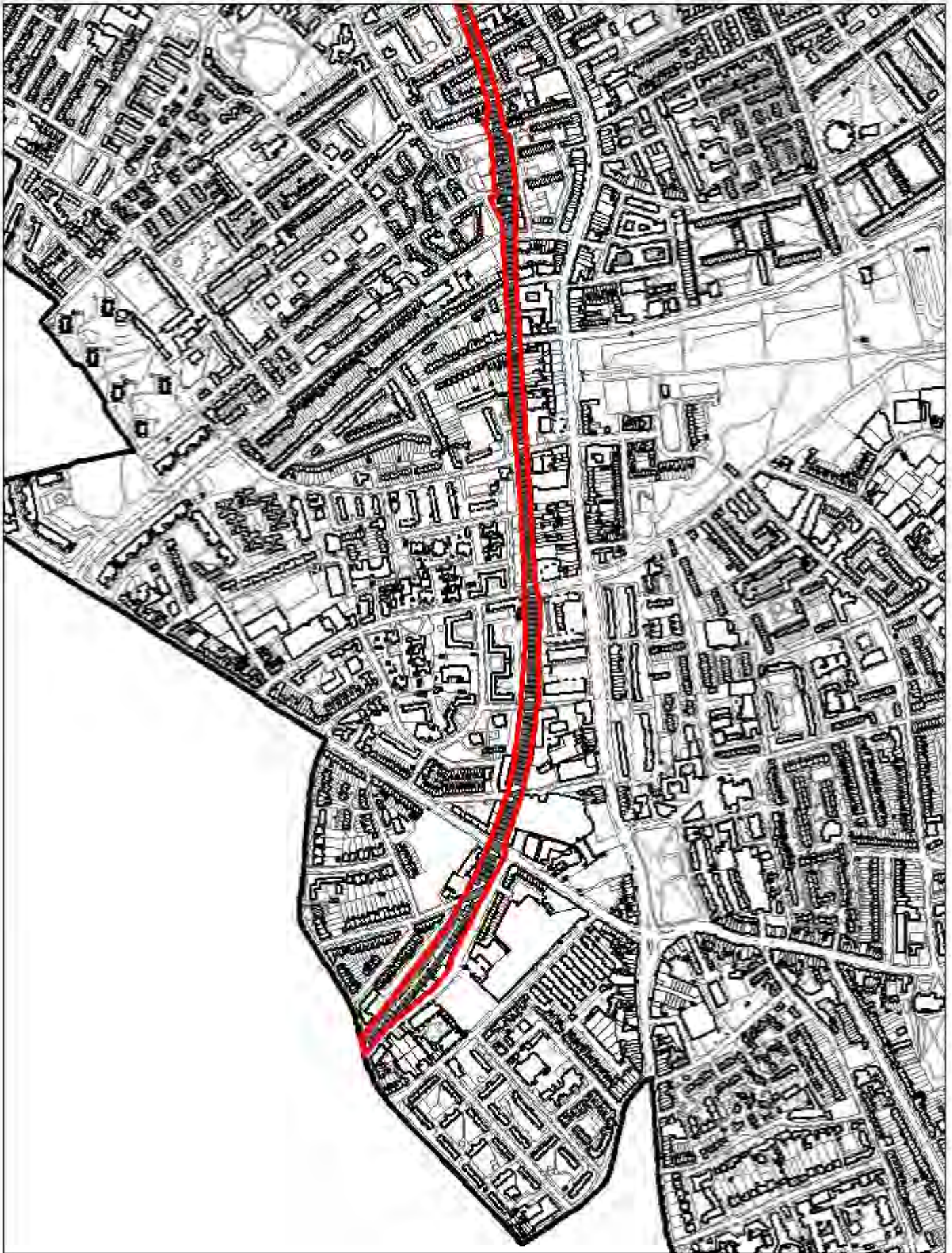




North-west Southwark railway arches



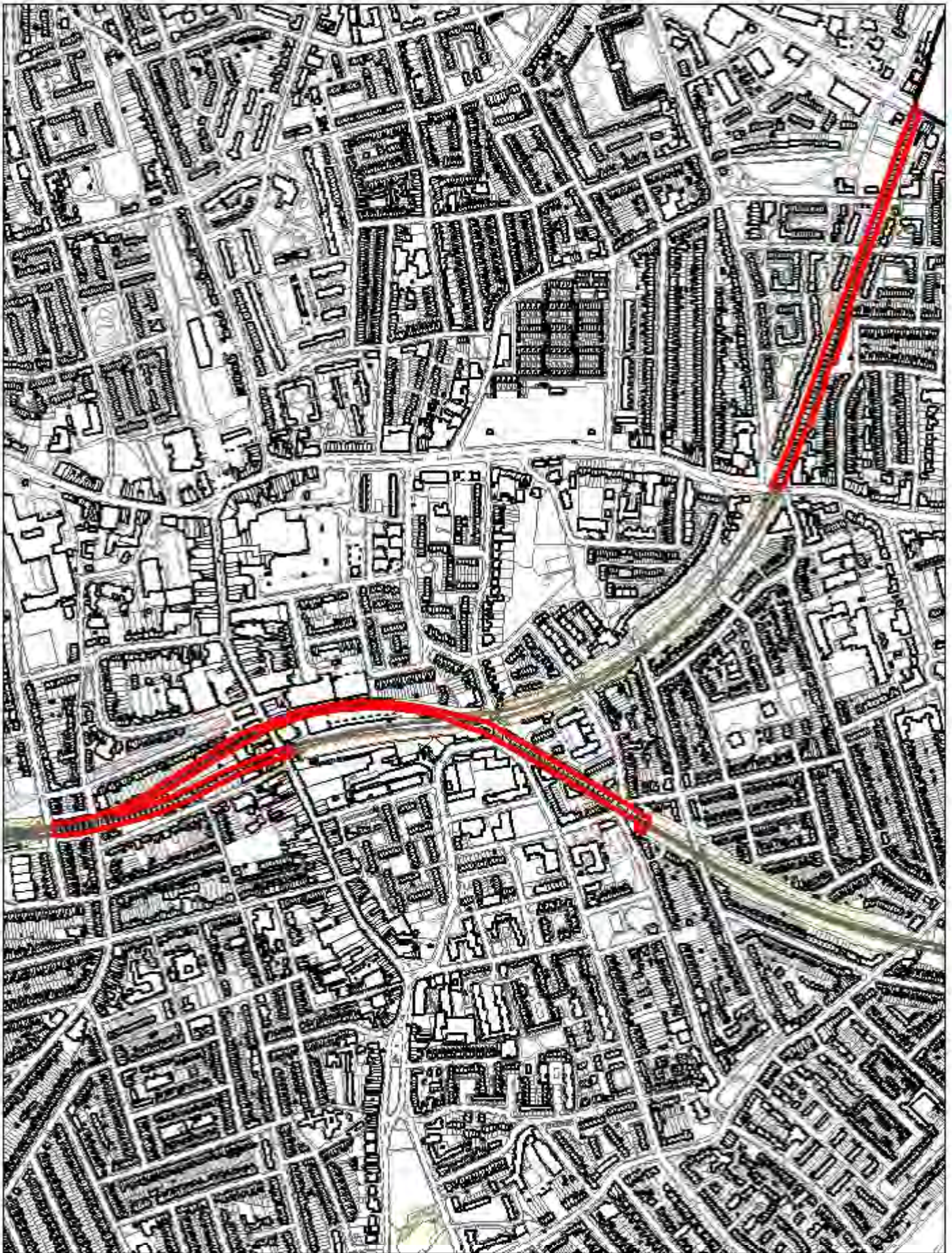
West Southwark/Walworth Road railway arches



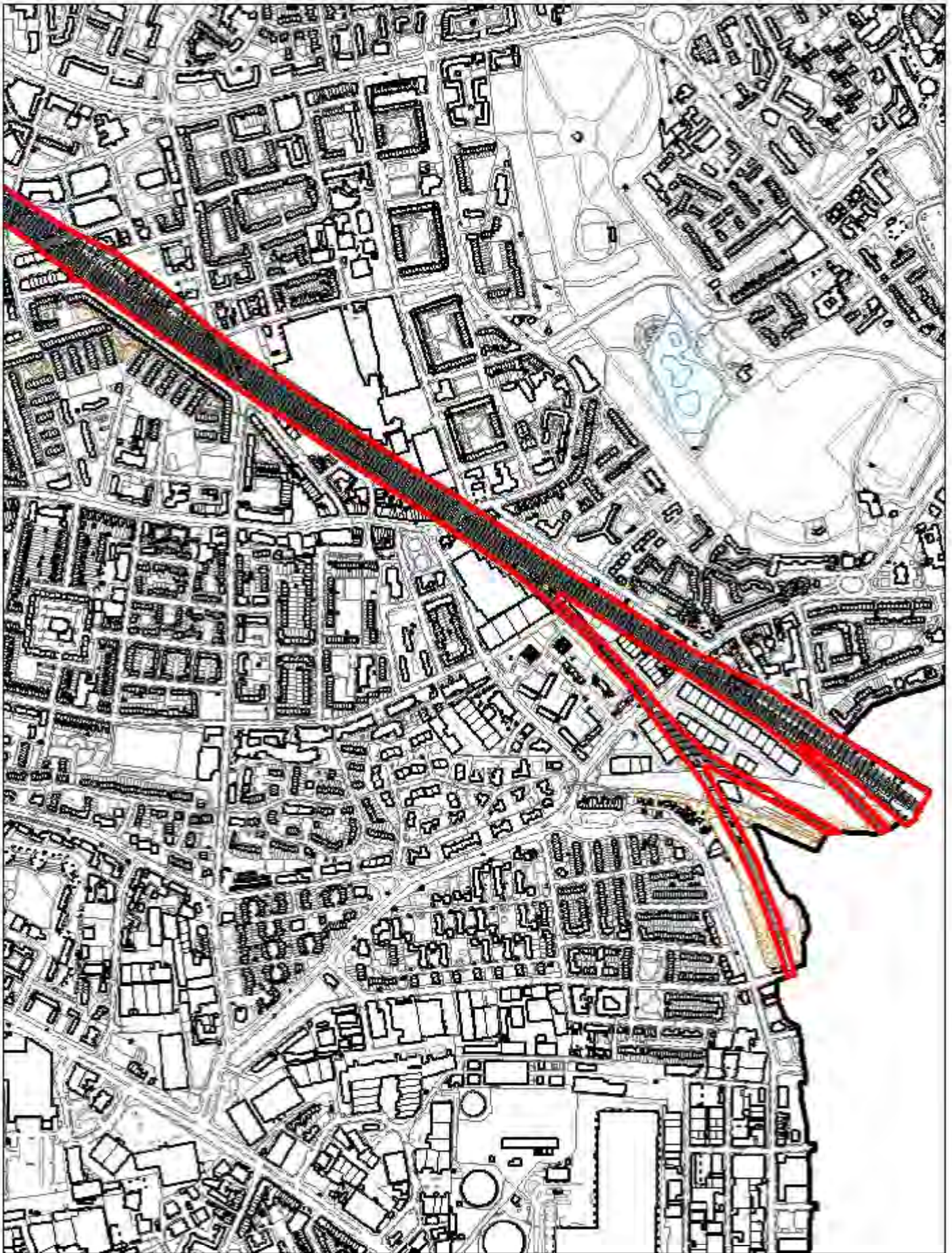
West Southwark/Camberwell railway arches



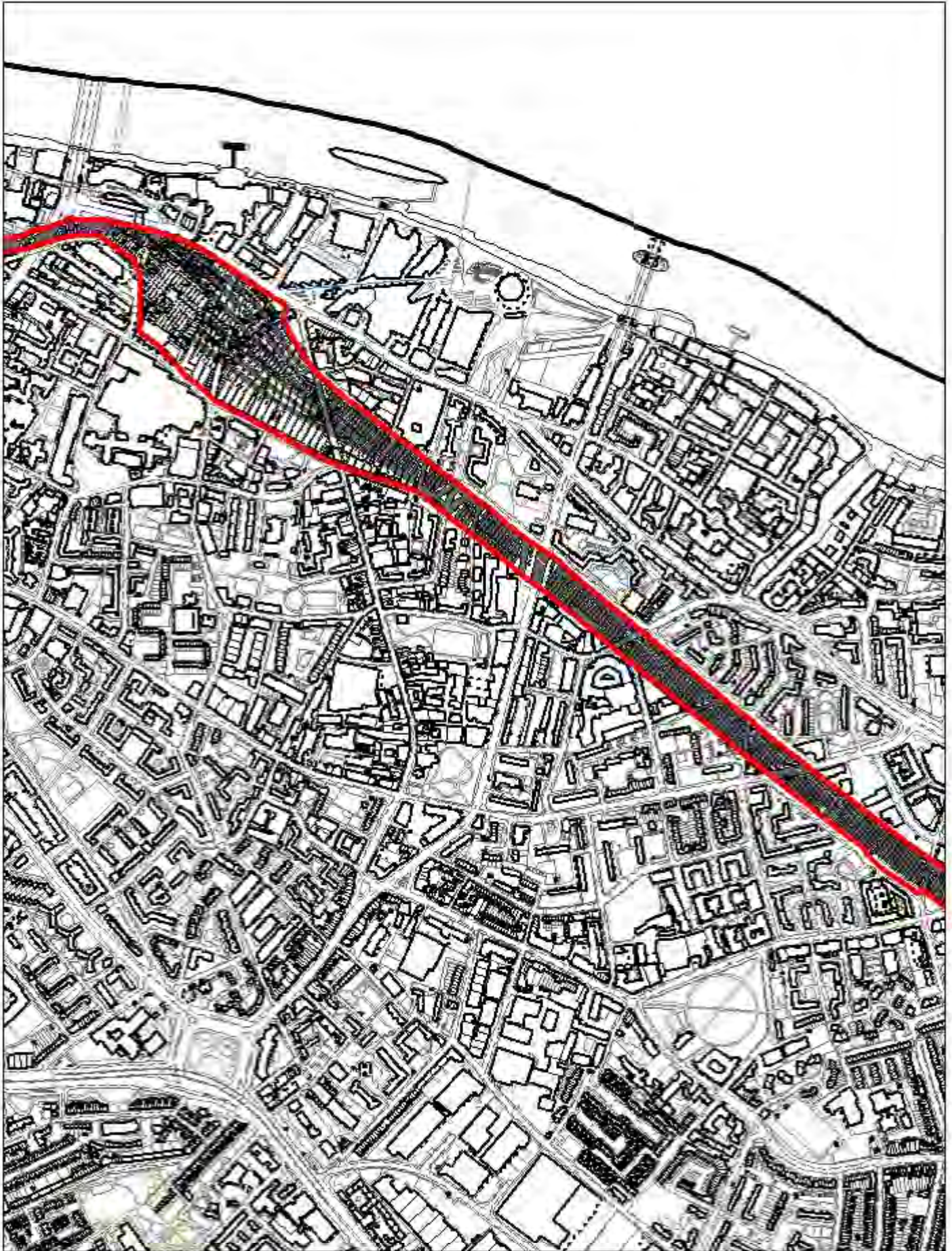
Herne Hill railway arches



Peckham railway arches



South-east Bermondsey railway arches



London Bridge/Bermondsey railway arches

Article 4 Directions relating to demolition and change of use from commercial buildings to residential

No.	Title
Appendix A	Draft Article 4 Directions proposed
Appendix B	Map of the areas subject to proposed Article 4 Directions
Appendix C	Equalities Impact Assessment
Appendix D	GLA strategic evidence to support London borough Article 4 Directions

**Article 4 Directions
Equalities Impact Assessment
July 2021**

Guidance notes

Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the affect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- We consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- We have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- We review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- We take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- We consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:

- Consider all the protected characteristics and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Use insights from engagement with employees, service users and others who can help provide evidence for equality analysis.

Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity.

The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or be present within divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications Scheme.

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments. Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and www.southwarkadvice.org.uk).

Whilst the equality analysis is being considered, Southwark Council recommends considering health and wellbeing implications, as health and health inequalities are strongly influenced by the environment we live and work in. As a major provider of services to Southwark residents, the council has a legal duty to reduce health inequalities and this is reflected in its values and aims. For this reason, the council recommends considering health and wellbeing impacts in all equality analyses, not forgetting to include identified potential mitigating actions.

Section 1

Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates		Article 4 Directions Report for Planning Committee			
Equality analysis author		Lauren Wilkinson/Michael Gozo			
Strategic Director		Stephen Platts			
Department		Planning	Division	Chief Executive's	
Date of analysis		July 2021			
Sign-off	Laura Hills Juliet Seymour Colin Wilson	Position	Planning Policy Team Leader, Planning Policy Manager, Head of Old Kent Road Regeneration	Date	July 2021

Section 2: Brief description of policy/decision/business plan

This equalities analysis report supports the report, which request confirmation on the introduction of the following Article 4 Directions:

Article 4 Direction for the prevention of change of use from office use to a dwelling house

- Approves non-immediate Article 4 Directions to withdraw the permitted development rights granted by Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (GPDO) Order 2015 for changes of use from office use (Class E(g)(i)) to a dwelling house(Class C3) in the Central Activities Zone and railway arches in Southwark.

Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches

- Approves immediate Article 4 Directions to withdraw the permitted development rights granted by Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (GPDO) Order 2015 for changes of use from Commercial, Business and Leisure (Class E - except offices) to a dwelling house (Class C3) in the Central Activities Zone and railway arches in Southwark.

Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL

- Approves immediate Article 4 Directions to withdraw the permitted development rights granted by Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (GPDO) Order 2015 for changes of use from Commercial, Business and Leisure (Class E)to a dwelling house (Class C3) in the following locations:
 - Town centres including primary and secondary shopping frontages and New Southwark Plan Site Allocations inside town centres.
 - Secondary shopping frontages outside of town centres
 - New Southwark Plan Site Allocations outside of town centres
 - New Southwark Plan proposed Strategic Protected Industrial Land

Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses

- Approves immediate Article 4 Directions to withdraw the permitted development rights granted by Schedule 2, Part 3, Class ZA (to be amended) of the Town and Country Planning (General Permitted Development) (GPDO) Order 2015 for demolition of commercial buildings and construction of new dwelling houses in the following locations:
 - Town centres including primary and secondary shopping frontages and New Southwark Plan Site Allocations inside town centres
 - New Southwark Plan Site Allocations outside of town centres

- New Southwark Plan proposed Strategic Protected Industrial Land

Summary of the Impacts

Overall, the impact of the Article 4 Directions implementation is positive. It protects against the negative impacts of change of uses in key strategic locations including the Central Activities Zones, Town Centres, New Southwark Plan Site Allocations and SPIL. These Article 4 Directions are designed to protect employment generating uses to support a Strong Local Economy across the borough in town centres and key employment areas such as the Central Activities Zone.

The proposed permitted development right undermine the long-term sustainability, vitality and viability of Southwark's town and local centres. High streets are not only important economic places, but also social spaces for elderly people, young people and particular minority ethnic communities.¹ Loneliness and social isolation is particularly pronounced in certain groups, such as LGBTQ communities, those with a long-term illness or disability, particular minority ethnic groups, and the elderly.² Southwark's high streets are also important places for local and accessible economic opportunities for a range of communities, including young people, mothers and particular minority ethnic communities. The proposed permitted development right would reduce crucial commercial, business and service floorspace, which has many economic, social, health and wellbeing benefits for people with protected characteristics.

The protection of uses which provide active frontages in town centres, high streets and key employment locations, will support their long-term sustainability, vitality and viability, and support quality place-making. The reduction in active ground floor uses, would have a negative impact on the public realm, footfall and economic renewal. Disadvantaged communities are more likely to live near poor quality local high streets. The associated impacts including area degradation, non-inclusive design and fear of crime will have significant impacts for many of the protected characteristics.

The prevention of conversions to residential uses also ensures that residential quality of accommodation, amenity and safety are prioritised. Historically, housing produced through permitted development has been evidenced to produce poor quality accommodation, chronic space shortage; the ignoring of basic standards of light and ventilation; and inappropriate locations for housing. The impacts of poor quality housing has significant implications for a number of protected characteristics, including young people, older people, those with disabilities, pregnancy and maternity, particular ethnic communities and those with socio-economic disadvantage. The health impacts of poor quality housing include respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality, increased stress, depression and anxiety. Although space standards have been applied to permitted development housing – there isn't the evidence available yet to suggest improved housing conditions in practice.

There are few specific positive impacts on health from the adoption of Article 4 Directions. The overall impact on health is neutral, and it is likely that the impact of the protection of

¹ We Made That, LSE Cities, High Streets for all (2017)

² Office for National Statistics (2018). Loneliness – What characteristics and circumstances are associated with feeling

certain land uses in town centres and the prevention of change of use to residential from office space will ensure a high quality of residential accommodation and amenity for residents in Southwark, which will benefit long term mental health and wellbeing of local residents.

Section 3: Service users and stakeholders

Service users and stakeholders	
Key users of the department or service	Members of the public; Developers; Local Authorities; Housing Associations; Environment and Leisure Department; Flood and Drainage Department; Children's and Adult's Services Department; Housing and Modernisation Department; Councillors; Finance and Governance Department; Place and Wellbeing Department; Greater London Authority; Transport for London; Thames Water; Metropolitan Police; Chief Executive's Department.
Key stakeholders were/are involved in this policy/decision/business plan	Members of the public; Housing Associations; Local Authorities Environment and Leisure Department; Children's and Adult's Services Department; Housing and Modernisation Department; Councillors; Finance and Governance Department; Place and Wellbeing Department.

Section 4: Pre-implementation equality analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken.

The first column on the left is for societal and economic issues (discrimination, higher poverty levels) and the second column on the right for health issues, physical and mental. As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that health is given special consideration, as it is the council's declared intention to reduce health inequalities in the borough. The Public Health Team can assist with research and data.

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>This Article 4 Direction will have positive impacts for all because it protects office floorspace in strategic locations to support a strong local economy and deliver employment generating uses.</p> <p>The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses. Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all ages.</p> <p>The Article 4 Direction will also protect against the creation of poor quality housing through permitted development. Housing produced through permitted development has been evidenced to produce poor quality accommodation.³ The health and social impacts of poor quality housing disproportionately impacts older people, young people. For example, children attain less well at school, have poorer physical health and have increased stress, anxiety and depression.⁴</p>	<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>By preventing the change of use from office to a dwelling house in key locations, employment floorspace is protected to deliver more jobs for local people.</p> <p>Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for local residents. Those who are very young, or elderly are most vulnerable to the impacts of this, and therefore the Article 4 Direction has positive impacts on health, specifically mental health and wellbeing. For example, children attain less well at school, have poorer physical health and have increased stress, anxiety and depression.⁵ Health conditions associated with poor conditions include: respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality, increased stress, depression and anxiety.⁶</p>
<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction protects against the conversion of Railway Arches to residential</p>	<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality</p>

³ Clifford, B., Canelas, P., Ferm, J. and Livingstone, N., Lord, A. and Dunning, R., *Research into the quality standard of homes delivered through change of use permitted development right* (2020), UCL and University of Liverpool

⁴ Michael Marmot, Jessica Allen, Tammy Boyce, Peter Goldblatt, Joana Morrison (2020) *Health equity in England: The Marmot Review 10 years on*. London: Institute of Health Equity

⁵ *Ibid.*

⁶ *Ibid.*

<p>which can be problematic. There are amenity and safety issues arising from the conversion of railway arches to residential dwelling houses. Housing produced through permitted development has been evidenced to produce poor quality accommodation. The health and social impacts of poor quality housing disproportionately impacts older people, young people.</p> <p>Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.</p>	<p>residential accommodation and amenity. Poor quality housing has a number of health impacts. Those who are very young, or elderly are most vulnerable to the impacts of this, and therefore the Article 4 Direction has positive impacts on health, specifically mental health and wellbeing. For example, children attain less well at school, have poorer physical health and have increased stress, anxiety and depression. Health conditions associated with poor conditions include: respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality, increased stress, depression and anxiety.</p>
<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The Article 4 Direction will also protect against the loss of small affordable shops, commercial, business and leisure uses locally in key locations across the borough. This proposed right would reduce the active frontages in town centres, high streets and key employment locations. Significant stretches of inactive frontages (with aesthetically incongruous former shop fronts) will undermine their long-term sustainability, vitality and viability, and diminish the ability of local planning authorities to ensure quality place-making. The reduction in active ground floor uses, would have a negative impact on the public realm, footfall and economic renewal. Disadvantaged communities are more likely to live near poor quality local high streets. For example, poor public realm and non-inclusive design will have significant impacts on young children and older people.⁷</p> <p>This ensures that accessibility to employment and amenity is well distributed in the borough which delivers positive impacts for all, and especially those who are</p>	<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>Those who are very young, or elderly are most vulnerable to the impacts of this, and therefore the Article 4 Direction has positive impacts on health, specifically mental health and wellbeing. For example, children attain less well at school, have poorer physical health and have increased stress, anxiety and depression. Health conditions associated with poor conditions include: respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality, increased stress, depression and anxiety.</p> <p>The creation of a poor quality public realm through the creation of inactive frontages could lead to broader area degradation and fear of crime. The health impacts include: poor mental health and stress-related illness from increased levels of antisocial behaviour, crime and fear of crime. Lower levels of physical activity linked to obesity, diabetes, cardiovascular disease and some cancers. Higher levels of</p>

⁷ Daly S, Allen J, *Healthy High Streets*, Public Health England and Institute of Health Equity: London; 2018

<p>more vulnerable including those who are very young or elderly.</p> <p>The Article 4 Direction will also protect against the creation of poor quality housing through permitted development. Housing produced through permitted development has been evidenced to produce poor quality accommodation. The health and social impacts of poor quality housing disproportionately impacts older people, young people.</p>	<p>fear of crime are experience by young people and older people.⁸</p>
<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensuring employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities which has wider positive societal benefits for all, and especially those who are more vulnerable due to their age.</p>	<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise. The equality and health data specifically relied upon has been referenced throughout this report.</p> <p>The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.</p>	
<p>Mitigating actions to be taken</p>	
<p>There are no further mitigating actions to take. The above analysis highlights that the implementation of the Article 4 Directions will largely give rise to positive impacts.</p>	

<p>Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>

⁸ *ibid.*

<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>This Article 4 Direction will have positive impacts for all because it protects office floorspace in strategic locations to support a strong local economy and deliver employment generating uses. The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses.</p> <p>Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all abilities. The changes of uses to residential will have a negative impact on individuals with disabilities as office units were not built primarily in mind. For instance, office, commercial and leisure units may not have safe access for wheelchairs and people with limited mobility could struggle. There may be also limited vehicle spaces. Article 4 Directions will ensure there will be quality homes will be built, accessible and adaptable for people with disabilities. Overall, this will ensure there is a positive impact on those of all abilities.</p>	<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>By preventing the change of use from office to a dwelling house in key locations, employment floorspace is protected to deliver more jobs for local people.</p> <p>Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for local residents. Those who have a disability are likely to experience distinct issues arising from the lack of availability of having an accessible home, including: indignity of not being able to live independently, poorer mental health, mobility problems, feelings of social isolation and anxiety, four times less likely to be in work.⁹</p>
<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction protects against the conversion of Railway Arches to residential which can be problematic. There are amenity and safety issues arising from the conversion of railway arches to residential dwelling houses. Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.</p>	<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for those of all abilities. Those who have a disability are likely to experience distinct issues arising from the lack of availability of having an accessible home, including: indignity of not being able to live independently, poorer mental health, mobility problems, feelings of social isolation and anxiety, four times less likely to be in work.</p>

⁹ Equality and Human rights Commission, *Housing and disabled people: Britain's hidden crisis* (2018)

<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The Article 4 Direction will also protect against the loss of small affordable shops, commercial, business and leisure uses locally in key locations across the borough. This proposed right would reduce the active frontages in town centres, high streets and key employment locations. Significant stretches of inactive frontages (with aesthetically incongruous former shop fronts) will undermine their long-term sustainability, vitality and viability, and diminish the ability of local planning authorities to ensure quality place-making. The reduction in active ground floor uses, would have a negative impact on the public realm, footfall and economic renewal. Disadvantaged communities are more likely to live near poor quality local high streets. For example, poor public realm and non-inclusive design will have significant impacts on people with disabilities.¹⁰</p> <p>The Article 4 Direction ensures that accessibility to employment and amenity is well distributed in the borough which delivers positive impacts for all, and especially those who are more vulnerable.</p>	<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for those of all abilities. Those who have a disability are likely to experience distinct issues arising from the lack of availability of having an accessible home, including: indignity of not being able to live independently, poorer mental health, mobility problems, feelings of social isolation and anxiety, four times less likely to be in work.</p> <p>The creation of a poor quality public realm through the creation of inactive frontages could lead to broader area degradation and fear of crime, and disproportionate victimisation. The health impacts include: poor mental health and stress-related illness from increased levels of antisocial behaviour, crime and fear of crime. Increased risk of trips and falls, and road traffic injury or mortality.¹¹</p>
<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensures employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities better which has wider positive societal benefits for all, and especially those of all abilities.</p>	<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>

¹⁰ Daly S, Allen J, *Healthy High Streets*, Public Health England and Institute of Health Equity: London; 2018

¹¹ Ibid.

This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.

The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.

Mitigating actions to be taken

There are no further mitigating actions to take. The above analysis highlights that the implementation of the Article 4 Directions will largely give rise to positive impacts.

Gender reassignment - The process of transitioning from one gender to another.

Potential impacts (positive and negative) of proposed policy/decision/business plan

Potential health impacts (positive and negative)

Article 4 Direction for the prevention of change of use from office use to a dwelling house

This Article 4 Direction will have positive impacts for all because it protects office floorspace in strategic locations to support a strong local economy and deliver employment generating uses. The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses. Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all.

Article 4 Direction for the prevention of change of use from office use to a dwelling house

By preventing the change of use from office to a dwelling house in key locations, employment floorspace is protected to deliver more jobs for local people. Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for all local residents.

Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches

This Article 4 Direction protects against the conversion of Railway Arches to residential which can be problematic. There are amenity and safety issues arising from the conversion of railways arches to residential dwelling houses. Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.

Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches

This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for all.

<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The Article 4 Direction will also protect against the loss of small affordable shops, commercial, business and leisure uses locally in key locations across the borough. This ensures that accessibility to employment and amenity is well distributed in the borough which delivers positive impacts for all, and especially those who are more vulnerable.</p>	<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensures employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities better which has wider positive societal benefits for all, and especially for those who are more vulnerable.</p>	<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.</p> <p>The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.</p>	
<p>Mitigating actions to be taken</p> <p>There are no further mitigating actions to take. The above analysis highlights that the implementation of the Article 4 Directions will largely give rise to positive impacts.</p>	

<p>Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>
<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>This Article 4 Direction will have positive impacts for all because it protects office</p>	<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>By preventing the change of use from office to a dwelling house in key locations,</p>

<p>floorspace in strategic locations to support a strong local economy and deliver employment generating uses. The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses.</p> <p>Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all.</p>	<p>employment floorspace is protected to deliver more jobs for local people.</p> <p>Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for all local residents. For example, children attain less well at school, have poorer physical health and have increased stress, anxiety and depression.¹² Health conditions associated with poor conditions include: respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality, increased stress, depression and anxiety.</p>
<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction protects against the conversion of Railway Arches to residential which can be problematic. There are amenity and safety issues arising from the conversion of railways arches to residential dwelling houses. Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.</p>	<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for all, and especially those who are more vulnerable.</p>
<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The Article 4 Direction will also protect against the loss of small affordable shops, commercial, business and leisure uses locally in key locations across the borough.</p> <p>This permitted development right would reduce the active frontages in town centres, high streets and key employment locations.</p>	<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The creation of a poor quality public realm through the creation of inactive frontages could lead to broader area degradation and fear of crime. The health impacts include: poor mental health and stress-related illness from increased levels of antisocial</p>

¹² *Health equity in England: The Marmot Review 10 years on*

<p>Significant stretches of inactive frontages (with aesthetically incongruous former shop fronts) will undermine their long-term sustainability, vitality and viability, and diminish the ability of local planning authorities to ensure quality place-making. The reduction in active ground floor uses, would have a negative impact on the public realm, footfall and economic renewal. Disadvantaged communities are more likely to live near poor quality local high streets. For example, poor public realm and non-inclusive design will have significant impacts on people who share the pregnancy and maternity protected characteristic.¹³</p> <p>This ensures that accessibility to employment and amenity is well distributed in the borough which delivers positive impacts for all, and especially those who are more vulnerable.</p>	<p>behaviour, crime and fear of crime. Lower levels of physical activity linked to obesity, diabetes, cardiovascular disease and some cancers. Non-inclusive design has a significant impact on parents with young children.¹⁴</p>
<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensures employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities better which has wider positive societal benefits for all, and especially for those who are more vulnerable.</p>	<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise</p> <p>The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.</p>	
<p>Mitigating actions to be taken</p>	
<p>There are no further mitigating actions to take. The above analysis highlights that the implementation of the Article 4 Directions will largely give rise to positive impacts.</p>	

¹³ *Healthy High Streets*

¹⁴ *Ibid.*

<p>Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>
<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u> This Article 4 Direction will have positive impacts for all because it protects office floorspace in strategic locations to support a strong local economy and deliver employment generating uses. The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses.</p> <p>Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all.</p> <p>The Article 4 Direction will also protect against the creation of poor quality housing through permitted development. Housing produced through permitted development has been evidenced to produce poor quality accommodation.¹⁵ The effects of poor housing disproportionately impacts the most vulnerable communities, including Black, Asian and minority ethnic communities.</p>	<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u> By preventing the change of use from office to a dwelling house in key locations, employment floorspace is protected to deliver more jobs for local people.</p> <p>Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. Poor quality housing has a number of health impacts. Particular minority ethnic communities disproportionately experience poor quality housing.¹⁶ Health conditions associated with poor conditions include: respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality, increased stress, depression and anxiety. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for all local residents.</p>
<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u> This Article 4 Direction protects against the conversion of Railway Arches to residential which can be problematic. There are amenity and safety issues arising from the conversion of railway arches to residential dwelling houses. Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of</p>	<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u> This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for all.</p> <p>Poor quality housing has a number of</p>

¹⁵ *Research into the quality standard of homes delivered through change of use permitted development right*

¹⁶ <https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/overcrowded-households/latest#by-ethnicity>

<p>employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.</p> <p>The Article 4 Direction will also protect against the creation of poor quality housing through permitted development. Housing produced through permitted development has been evidenced to produce poor quality accommodation.¹⁷ The effects of poor housing disproportionately impacts the most vulnerable communities, including Black, Asian and minority ethnic communities.</p>	<p>health impacts. Particular minority ethnic communities disproportionately experience poor quality housing.¹⁸ Health conditions associated with poor conditions include: respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality, increased stress, depression and anxiety.</p>
<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The Article 4 Direction will also protect against the loss of small affordable shops, commercial, business and leisure uses locally in key locations across the borough. This ensures that accessibility to employment and amenity is well distributed in the borough which delivers positive impacts for all, and especially those who are more vulnerable.</p> <p>This permitted development right would reduce the active frontages in town centres, high streets and key employment locations. Significant stretches of inactive frontages (with aesthetically incongruous former shop fronts) will undermine their long-term sustainability, vitality and viability, and diminish the ability of local planning authorities to ensure quality place-making. The reduction in active ground floor uses, would have a negative impact on the public realm, footfall and economic renewal. Disadvantaged communities are more likely to live near poor quality local high streets.¹⁹</p>	<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p> <p>The creation of a poor quality public realm through the creation of inactive frontages could lead to broader area degradation and fear of crime. Higher fear of crime is found in black and minority ethnic communities, along with young people, older people and women. The health impacts include: poor mental health and stress-related illness from increased levels of antisocial behaviour, crime and fear of crime. Lower levels of physical activity linked to obesity, diabetes, cardiovascular disease and some cancers.</p>
<p><u>Article 4 direction to prevent the demolition</u></p>	<p><u>Article 4 direction to prevent the demolition</u></p>

¹⁷ *Research into the quality standard of homes delivered through change of use permitted development right*

¹⁸ <https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/overcrowded-households/latest#by-ethnicity>

¹⁹ *Healthy High Streets*

<p><u>of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensures employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities better which has wider positive societal benefits for all, and especially for those who are more vulnerable.</p>	<p><u>of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.</p> <p>The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.</p>	
<p>Mitigating actions to be taken</p>	
<p>There are no further mitigating actions to take. The above analysis highlights that the implementation of the Article 4 Directions will largely give rise to positive impacts.</p>	

<p>Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>
<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>This Article 4 Direction will have positive impacts for all because it protects office floorspace in strategic locations to support a strong local economy and deliver employment generating uses. The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses.</p> <p>Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all.</p>	<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>By preventing the change of use from office to a dwelling house in key locations, employment floorspace is protected to deliver more jobs for local people. Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for all local residents.</p>

<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction protects against the conversion of Railway Arches to residential which can be problematic. There are amenity and safety issues arising from the conversion of railways arches to residential dwelling houses. Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.</p>	<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for all.</p>
<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The Article 4 Direction will also protect against the loss of small affordable shops, commercial, business and leisure uses locally in key locations across the borough. This ensures that accessibility to employment and amenity is well distributed in the borough which delivers positive impacts for all, and especially those who are more vulnerable.</p>	<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensures employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities better which has wider positive societal benefits for all, and especially for those who are more vulnerable.</p>	<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.</p> <p>The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.</p>	

Mitigating actions to be taken

There are no further mitigating actions to take. The above analysis highlights that the implementation of the Article 4 Directions will largely give rise to positive impacts.

Sex - A man or a woman.

Potential impacts (positive and negative) of proposed policy/decision/business plan**Potential health impacts (positive and negative)**Article 4 Direction for the prevention of change of use from office use to a dwelling house

This Article 4 Direction will have positive impacts for all because it protects office floorspace in strategic locations to support a strong local economy and deliver employment generating uses. The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses. Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all.

Article 4 Direction for the prevention of change of use from office use to a dwelling house

By preventing the change of use from office to a dwelling house in key locations, employment floorspace is protected to deliver more jobs for local people. Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for all local residents.

Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches

This Article 4 Direction protects against the conversion of Railway Arches to residential which can be problematic. There are amenity and safety issues arising from the conversion of railway arches to residential dwelling houses. Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.

Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches

This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for all.

Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL

The Article 4 Direction will also protect

Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL

There are no specific identified positive,

<p>against the loss of small affordable shops, commercial, business and leisure uses locally in key locations across the borough. This ensures that accessibility to employment and amenity is well distributed in the borough which delivers positive impacts for all, and especially those who are more vulnerable.</p> <p>This permitted development right would reduce the active frontages in town centres, high streets and key employment locations. Significant stretches of inactive frontages (with aesthetically incongruous former shop fronts) will undermine their long-term sustainability, vitality and viability, and diminish the ability of local planning authorities to ensure quality place-making. The reduction in active ground floor uses, would have a negative impact on the public realm, footfall and economic renewal. The creation of a poor quality public realm through the creation of inactive frontages could lead to broader area degradation and fear of crime. Higher fear of crime is found in women, along with black and minority ethnic communities, young people, and older people.</p>	<p>negative or neutral impacts on health for this protected characteristic.</p> <p>The creation of a poor quality public realm through the creation of inactive frontages could lead to broader area degradation and fear of crime. The health impacts include: poor mental health and stress-related illness from increased levels of antisocial behaviour, crime and fear of crime. Lower levels of physical activity linked to obesity, diabetes, cardiovascular disease and some cancers.</p>
<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensures employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities better which has wider positive societal benefits for all, and especially for those who are more vulnerable.</p>	<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.</p> <p>The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.</p>	
<p>Mitigating actions to be taken</p>	
<p>There are no further mitigating actions to take. The above analysis highlights that the implementation of the Article 4 Directions will largely give rise to positive impacts.</p>	

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>This Article 4 Direction will have positive impacts for all because it protects office floorspace in strategic locations to support a strong local economy and deliver employment generating uses. The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses.</p> <p>Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all.</p>	<p><u>Article 4 Direction for the prevention of change of use from office use to a dwelling house</u></p> <p>By preventing the change of use from office to a dwelling house in key locations, employment floorspace is protected to deliver more jobs for local people. Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for all local residents.</p>
<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction protects against the conversion of Railway Arches to residential which can be problematic. There are amenity and safety issues arising from the conversion of railway arches to residential dwelling houses. Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.</p>	<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for all.</p>
<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The Article 4 Direction will also protect against the loss of small affordable shops, commercial, business and leisure uses</p>	<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>

<p>locally in key locations across the borough. This ensures that accessibility to employment and amenity is well distributed in the borough which delivers positive impacts for all, and especially those who are more vulnerable.</p> <p>This permitted development right would reduce the active frontages in town centres, high streets and key employment locations. Significant stretches of inactive frontages (with aesthetically incongruous former shop fronts) will undermine their long-term sustainability, vitality and viability, and diminish the ability of local planning authorities to ensure quality place-making. The reduction in active ground floor uses, would have a negative impact on the public realm, footfall and economic renewal. The creation of a poor quality public realm through the creation of inactive frontages could lead to broader area degradation and fear of crime. Whilst higher fear of crime is found in women, black and minority ethnic communities, young people, and older people. Disproportionate victimisation is experienced by LGBTQ+ people, alongside young black men, people with disabilities, and women.²⁰</p>	<p>The creation of a poor quality public realm through the creation of inactive frontages could lead to broader area degradation and fear of crime. The health impacts include: poor mental health and stress-related illness from increased levels of antisocial behaviour, crime and fear of crime. Lower levels of physical activity linked to obesity, diabetes, cardiovascular disease and some cancers.</p>
<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensures employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities better which has wider positive societal benefits for all, and especially for those who are more vulnerable.</p>	<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.</p> <p>The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.</p>	

²⁰ *Healthy High Streets*

Mitigating actions to be taken

There are no further mitigating actions to take. The above analysis highlights that the implementation of the Article 4 Directions will largely give rise to positive impacts.

Socio-economic disadvantage – although the Equality Act 2010 does not include socioeconomic status as one of the protected characteristics, Southwark Council recognises that this continues to be a major cause of inequality in the borough. Socio economic status is the measure of an area's, an individual's or families economic and social position in relation to others, based on income, education, health, living conditions and occupation.

Potential impacts (positive and negative) of proposed policy/decision/business plan**Potential health impacts (positive and negative)**Article 4 Direction for the prevention of change of use from office use to a dwelling house

This Article 4 Direction will have positive impacts for all because it protects office floorspace in strategic locations to support a strong local economy and deliver employment generating uses. The Article 4 Direction will also protect against the loss of affordable workspace in the Central Activities Zone which supports the growth of Small and Medium Enterprises and Local Small Businesses.

Protecting office and commercial space may primarily benefit those who are economically active, and this will have positive spill over impacts for all.

The Article 4 Directions will ensure there is strong employment across the borough. Therefore, as the local economy develops, individuals from a socio-economic disadvantage background will have more employment choice.

The Article 4 Direction will also protect against the creation of poor quality housing through permitted development. Housing produced through permitted development has been evidenced to produce poor quality accommodation. The health and social impacts of poor quality housing has significant impacts those from low socio-economic backgrounds.²¹

Article 4 Direction for the prevention of change of use from office use to a dwelling house

By preventing the change of use from office to a dwelling house in key locations, employment floorspace is protected to deliver more jobs for local people.

Moreover, the conversion of offices to dwelling houses can lead to poor quality residential accommodation and amenity for local residents. This Article 4 Direction has positive impacts on mental health and wellbeing by preventing poor quality conversions to housing for all local residents, regardless of background. Poor quality housing has a number of health impacts. Particular minority ethnic communities disproportionately experience poor quality housing.²² Health conditions associated with poor conditions include: respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality, increased stress, depression and anxiety.

²¹ Adam Tinson and Amy Clair, *Better housing is crucial for our health and the COVID-19 recovery*, Health Foundation (2020)

²² <https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/overcrowded-households/latest#by-ethnicity>

<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction protects against the conversion of Railway Arches to residential which can be problematic. There are amenity and safety issues arising from the conversion of railways arches to residential dwelling houses. Further by protecting the uses of commercial, business and leisure in the Central Activities Zone and Railway Arches it protects against the loss of employment generating uses in locations across the borough which can support a strong local economy and deliver employment opportunities for local people. This has positive spill over impacts for all.</p>	<p><u>Article 4 Direction for the prevention of change of use from commercial, business and leisure to a dwelling house in the Central Activities Zone and Railway Arches</u></p> <p>This Article 4 Direction has positive health impacts because it ensures the health and safety of residents but ensuring good quality residential accommodation and amenity. This has secondary benefits for long term mental health and wellbeing of residents for all. This is especially important for those from a socio-economic disadvantage background as they are more likely to reside in poor quality housing. This Article 4 Direction aims to reduce poor quality housing in railway arches for this reason.</p>
<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>The Article 4 Direction will also protect against the loss of small affordable shops, commercial, business and leisure uses locally in key locations across the borough. This ensures that accessibility to employment and amenity is well distributed in the borough which delivers positive impacts for all, and especially those who are more vulnerable. Southwark's key commercial areas are important places for local and accessible economic opportunities for a range of communities, including those with socio-economic disadvantage.</p>	<p><u>Article 4 Direction for the prevention of change of change of use from commercial, business and leisure to a dwelling house in town centre, Secondary Shopping Frontages and NSP site allocations outside of town centres and SPIL</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>
<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>This Article 4 Direction protects against the negative impacts of demolition and protects employment generating uses in town centres and key strategic locations. By protecting these uses in town centres it ensures employment is closer to where local residents live, it improves accessibility to employment, and makes access to amenities better which has wider positive</p>	<p><u>Article 4 direction to prevent the demolition of commercial buildings and construction of new dwelling houses</u></p> <p>There are no specific identified positive, negative or neutral impacts on health for this protected characteristic.</p>

societal benefits for all, and especially for those who are more vulnerable.	
Equality information on which above analysis is based	Health data on which above analysis is based
<p>This Equalities Analysis has also been informed by previous equalities analyses undertaken for planning policy documents, our evidence base documents and our local knowledge and expertise.</p> <p>The background and evidence of need for these Article 4 Directions are set out in the Article 4 Planning Committee Report.</p>	
Mitigating actions to be taken	
<p>There are no further mitigating actions to take. The above analysis highlights that the implementation of the Article 4 Directions will largely give rise to positive impacts.</p>	

Human Rights
<p>There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour , Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol.</p>
Potential impacts (positive and negative) of proposed policy/decision/business plan
<p>The Council has carefully considered the balance to be struck between individual rights and the wider public interest. The rights of those affected by the proposed Article 4 Directions have been considered under the Human Rights Act 1998 and it has been determined that none of the Articles will be triggered.</p>
Information on which above analysis is based
<p>Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way which is incompatible with the European Convention on Human Rights (ECHR). Various Convention rights may be engaged in the process of making and considering the Article 4 Directions, including under Articles 1 and 8 of the First Protocol. The European Court has recognised that “regard must be had to the fair balance that has to be struck between the competing interests of the individual and of the community as a whole”. Both public and private interests are to be taken into account in the exercise of the Council’s powers and duties as a local planning authority. Any interference with a Convention Right must be necessary and proportionate.</p>
Mitigating actions to be taken
<p>There are no further mitigating actions to take.</p>

Article 4 Directions relating to demolition and change of use from commercial buildings to residential

No.	Title
Appendix A	Draft Article 4 Directions proposed
Appendix B	Map of the areas subject to proposed Article 4 Directions
Appendix C	Equalities Impact Assessment
Appendix D	GLA strategic evidence to support London borough Article 4 Directions

MAYOR OF LONDON**Strategic evidence to support
London borough Article 4
Directions (commercial to
residential)**

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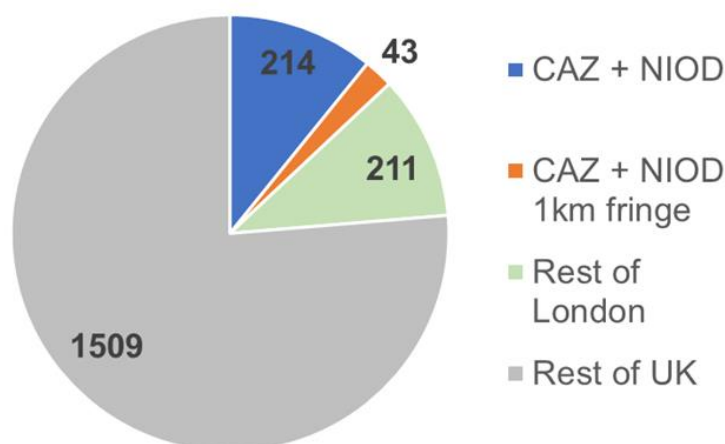
Executive Summary

- E1. This report provides strategic evidence to support Class E commercial to residential Article 4 Directions by local planning authorities (LPAs) in London. LPAs may draw on this evidence and use it to supplement their own local evidence to support Article 4 Directions for specific locations in appropriate circumstances.
- E2. The revised (2021) **National Planning Policy Framework (NPPF)** indicates that the use of Article 4 directions to remove national permitted development rights (PDR) related to change from non-residential use to residential use should be based on robust evidence, apply to the smallest geographical area possible and be limited to situations where this is necessary to avoid wholly unacceptable adverse impacts.

The Central Activities Zone and Northern Isle of Dogs

- E3. The **Central Activities Zone (CAZ)** is the vibrant heart and globally-iconic core of London. Its rich mix of world-class business, culture, night-time economy, tourism, shopping and heritage make it unique in both a London and national context. It requires different or tailored approaches to the application of national policy – including Class E to residential PDR - to address its distinct circumstances.
- E4. The CAZ and the Northern Isle of Dogs (NIOD) make an irreplaceable contribution to the output and prosperity of the nation. In 2019 the output of the CAZ and NIOD combined was £214 billion, accounting for almost half of London's output and around 11 per cent of UK output (see Figure E.1).

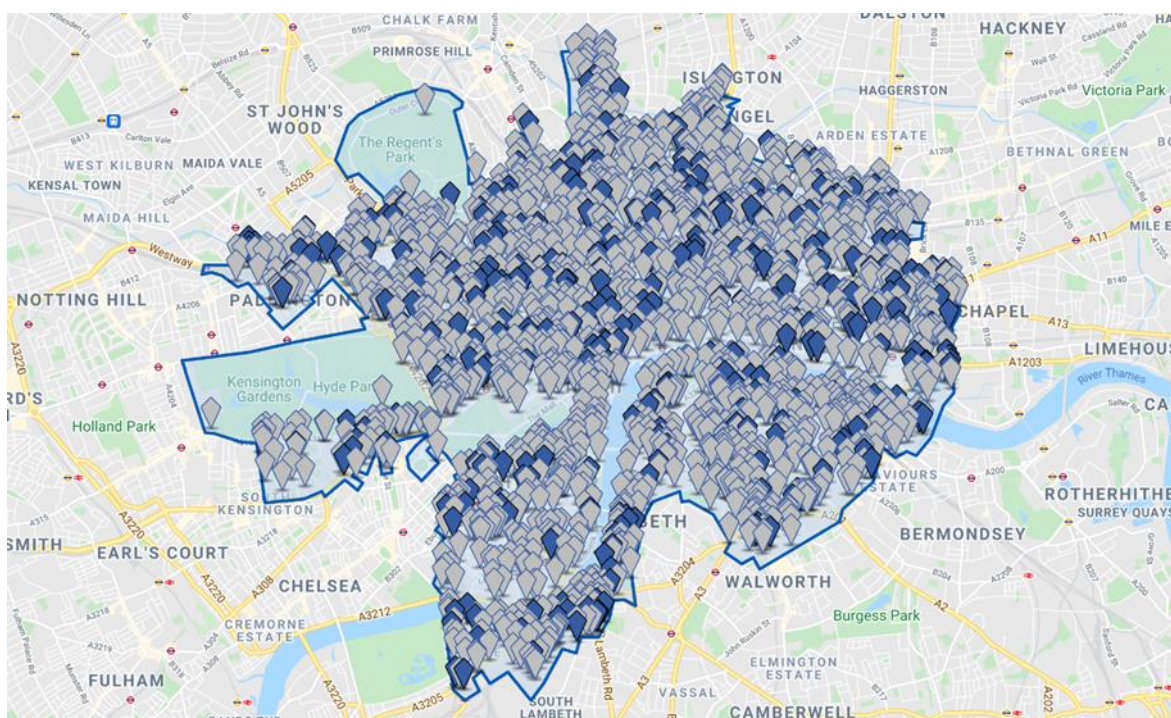
Figure E.1 Relative contributions of the CAZ, NIOD and a 1km fringe to London and UK output, 2019 (£ billion)



Source: ONS Regional GVA by local authority (income approach), ONS Business Register and Employment Survey, GLA Economics calculations.

- E5. The CAZ and NIOD are both internationally significant office locations. This was recognised by government when exemptions were granted to office to residential PDR when they were first introduced in 2013 and when the relevant London boroughs introduced office to residential Article 4 Directions for these areas when the exemptions were removed in May 2019.
- E6. The evolution and development of the CAZ requires careful management of the balance between its strategic functions (including uses within Class E) and residential development to ensure its success. In the absence of Article 4 Directions, the new Class E to residential PDR could threaten the future sustainability of the CAZ and NIOD. It is therefore vital that the strategic contributions made by the CAZ and NIOD to the economy, culture and identity of the capital are safeguarded.
- E7. Commercial, service and business uses are distributed widely across the whole of the CAZ (Figure E.2). The evidence presented in the report supports the introduction of Article 4 Directions to remove Class E to residential PDR across the whole of the CAZ and NIOD, being the smallest geographical area possible to avoid wholly unacceptable impacts in the terms of national policy. This will enable the CAZ and NIOD to flourish and to contribute to the recovery and the continued prosperity of the nation as a whole.

Figure E.2 Distribution of commercial uses in the Central Activities Zone

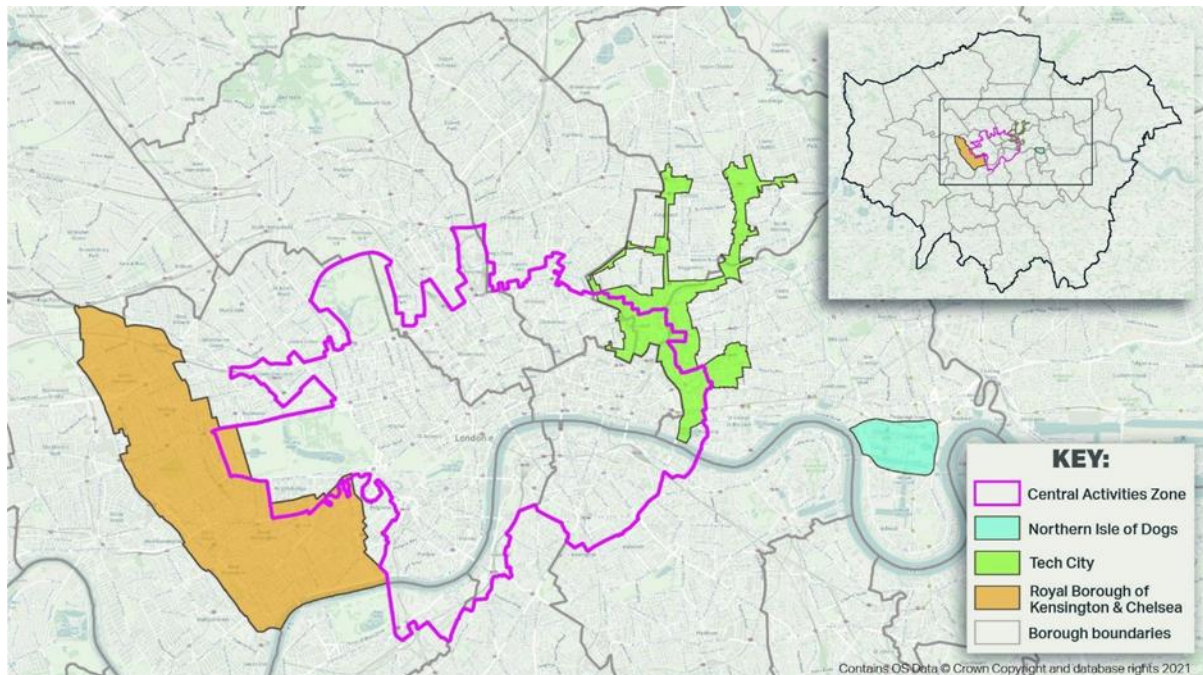


Source: CoStar (May 2021). Note that this Figure is illustrative and does not show all the commercial properties recorded in the CoStar database in the CAZ.

Strategically significant office locations beyond the CAZ

- E8. Beyond the CAZ and NIOD the London Plan recognises other strategically significant office locations in the capital including Tech City, the Royal Borough of Kensington & Chelsea, town centres and urban business parks.
- E9. In terms of **Tech City** and the **Royal Borough of Kensington & Chelsea** the Government granted an exemption for these areas (along with the CAZ and NIOD) from office to residential PDR in 2013, and in May 2019 the relevant boroughs introduced Article 4 Directions to ensure that they continued to be safeguarded (see Figure E.3).
- E10. **Tech City**, located in the London boroughs of Hackney, Islington and Tower Hamlets, contributed almost £15 billion to London's GVA output in 2019 and is estimated to contain more than 190,000 workforce jobs. The **Royal Borough of Kensington & Chelsea** contains a vibrant mix of business clusters which in 2019 contributed more than £10 billion to London's economic output. The introduction of Article 4 Directions will continue to support the growth and expansion of these important business clusters and their contributions to the national and London economy.

Figure E.3 London's nationally significant office locations



Source: GLA. Boundaries based on the areas granted exemptions by government from office to residential permitted development rights under the category 'nationally significant office locations'.

- E11. The London Plan identifies **town centre office locations** beyond the CAZ and NIOD. These office locations complement the CAZ and NIOD and cumulatively are of strategic importance to London. Locally they provide an important source of employment and economic activity and contribute to the

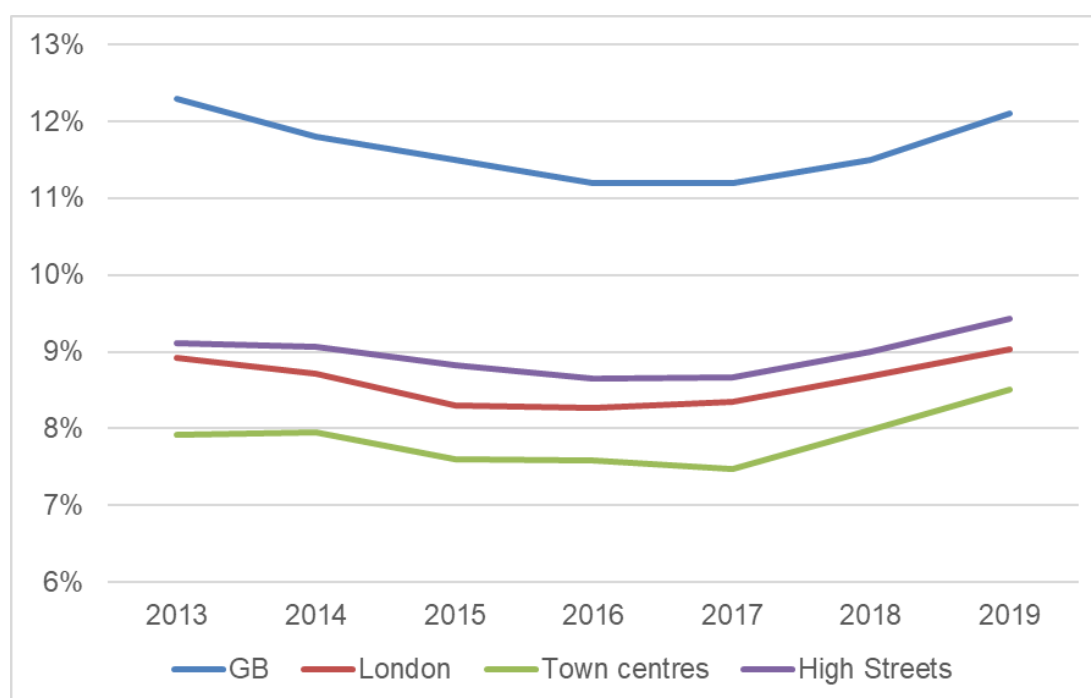
vibrancy and weekday spend of the town centres and high streets with which they are associated. The Mayor supports Article 4 Directions to remove Class E to residential PDR to safeguard the strategic office functions associated with these locations. These should be targeted accordingly drawing on more detailed local evidence.

- E12. London also contains several strategic office clusters located in **urban business parks** outside of town centres. The contribution of these business clusters to the economy and employment of outer London in particular could be reduced by Class E to residential PDR.

Town centres and high streets

- E13. London's high streets and town centres have shaped the fabric of the capital. They are a focal point for London's culture, communities and everyday economies.
- E14. Despite changes in consumer behaviour, technology and competition from out-of-centre development, they have shown their resilience by adapting and re-inventing themselves. They have diversified over time towards leisure uses and experiential, service retail uses. Vacancy rates in London's town centres and high streets are typically well below those experienced in other parts of the country. In 2019 the London average shop vacancy rate was 9 per cent compared to an average of 12 per cent for Britain as a whole (see Figure E.4).

Figure E.4 Shop vacancy rates in London's Town Centres and High Streets compared to the London and Great Britain average 2013-2019



Source: GLA Economics analysis of Local Data Company data

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- E15. To support London's economic and social recovery from the impacts of the pandemic, it is essential that there is space available for businesses to innovate, to start up and to create new jobs and this is central to the High Streets for All mission, part of the wider London Recovery Programme.
- E16. In some locations, the new PDR, in the absence of targeted Article 4 Directions, could undermine the adaptation of London's town centres and high streets as vibrant, successful locations for a range of business, culture, civic and community activities complemented by well-planned housing and mixed-use development.
- E17. With the right support and with concerted national, London-level and local action, town centres and high streets are well placed to recover from the impacts of the pandemic, and it is essential that these actions are not undermined by permitted development. There is a strong case for targeted Article 4 Directions to remove Class E to residential PDR to ensure that the social and economic functions of London's vibrant high streets and town centres are sustained and to support London's economic and social recovery.

Industrial areas and creative production space

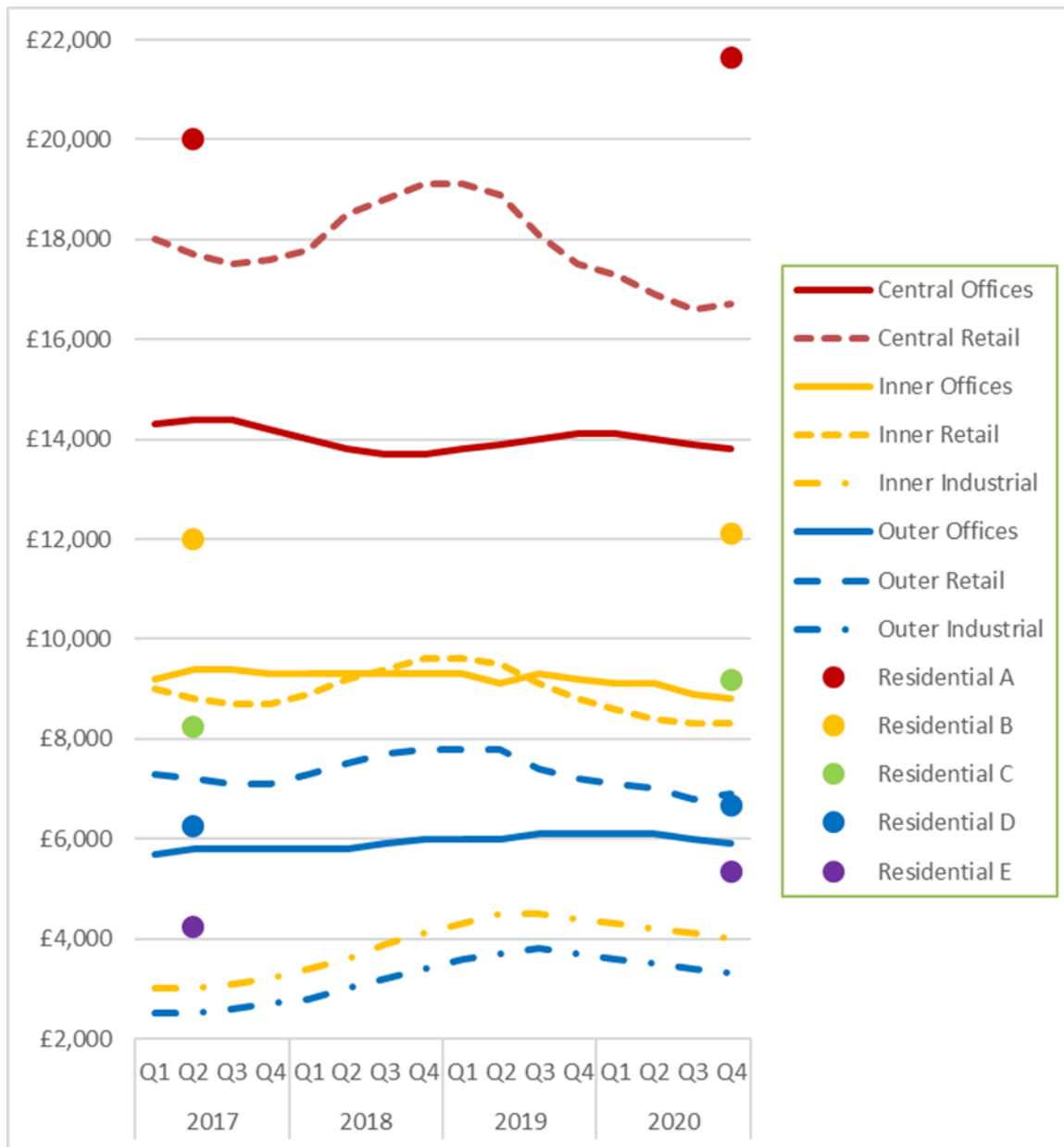
- E18. London's industrial capacity can be impacted by Class E to residential PDR both directly, through the loss of light industrial and creative production uses that fall within Class E, and indirectly, through the introduction of residential uses in industrial areas which can compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis.
- E19. The strategic evidence indicates there may be particular justification for the use of Article 4 Directions to safeguard these areas. Examples of the circumstances where Article 4 Directions might be particularly appropriate include:
- where local authorities may find it difficult to rely on clause MA.2.(2)(g) in the PDR legislation or where there is a high risk of land value speculation
 - where it is necessary to mitigate against the negative impacts of commercial to residential PDR on plan-led approaches to industrial intensification and co-location
 - where it is necessary to ensure that sufficient capacity for industry and logistics providing essential services to the CAZ and NIOD is not reduced by PDR, and

- in Creative Enterprise Zones and similar areas where it is important to safeguard capacity for light industrial, maker space and culture-oriented creative production uses.

Commercial and residential values in London

- E20. The difference between the value of offices, retail and light industrial properties relative to residential use in London, is such that the new Class E to residential PDR could see a significant loss of commercial uses to residential.
- E21. The strategic evidence (see Figure E.5) suggests that average residential values exceed average office and retail values in central London. In inner London, average residential values are typically greater than average office and retail values except in lower residential value band areas where the average values are broadly comparable. In outer London, average residential values typically exceed average office and retail values, except in lower residential value band areas where the average residential values are broadly comparable with average retail values, but marginally higher than office values. Average residential values currently exceed average industrial values in all parts of London.
- E22. The differential in value in residential use compared to commercial uses is such that PDR will impact all areas of London, including vibrant commercial areas, and not just areas of low commercial value.

Figure E.5 Indicative comparison of average capital values in residential and non-residential use by value band (£ per square metre)



Sources: GLA analysis of Three Dragons (2017) and Molior data (2020/21) for residential values and GLA analysis of CoStar market rent and yield data for commercial values (2017-2020).

Notes for Figure E.5

- 1: values for residential and non-residential capital values are derived from different sources.
- 2: the values are indicative averages - there could be significant local variations in residential and commercial values.
- 3: the values for inner and outer London offices are more likely to reflect higher value office locations especially in West and South London (where there are more transactions) - compared to lower value office areas in other parts of London.

Housing delivery and quality

- E23. The Mayor is committed to increase housing delivery in London and is using his funding and planning powers to unlock housing development opportunities and increase the supply of good quality homes that meet Londoners' diverse needs.
- E24. The London Plan contains policy to support the proactive delivery of housing in locations where the Mayor is providing strategic support for Article 4 Directions to remove Class E to residential PDR, including the CAZ, NIOD, town centres and high streets. There is a healthy housing development pipeline in these locations (see Figure E.6).

Figure E.6 Housing pipeline in the CAZ/NIOD, town centres and high streets in London, 2019

	Number of dwellings in the planning pipeline	% of London total
CAZ + NIOD	36,918	13%
Town centres	58,787	21%
Town centres + 800m buffer	108,260	39%
High Streets	54,796	20%
High Streets + 800m buffer	77,014	28%
London	278,794	100%

Source: Planning London Datahub data recorded on 28 May 2021. Pipeline subject to daily changes in permissions granted and lapsed and borough reporting. Note figures cannot be summed due to overlapping geographies.

- E25. In the context of the national housing crisis and constrained land supply, it is essential that all sources of supply – if appropriate for housing delivery – are used to best effect. Article 4 Directions can be a useful tool for ensuring that development capacity is optimised through site allocations, masterplans and town centre strategies, delivering better outcomes for housing delivery, housing quality and place-making.

1. Introduction

1.1 Purpose of the strategic evidence report

- 1.1.1 In March 2021 government published legislation¹ in England to introduce new permitted development rights (PDR) for the change of use of properties in the Commercial, Business and Service use class (Class E) to residential from 1 August 2021, subject to a range of conditions and limitations. Under the transitional arrangements, where there is an existing Article 4 direction on 31 July 2021 in respect of the change of use from offices to residential, it will continue to have effect on equivalent development in respect of offices until 31 July 2022.
- 1.1.2 The purpose of this report is to provide strategic context and evidence to support commercial to residential Article 4 Directions² by local planning authorities (LPAs) in London³. LPAs may draw on this evidence and use it to supplement their own local evidence to support Article 4 Directions for specific locations in appropriate circumstances. The report is drawn up in the context of national policy and the 2021 London Plan.
- 1.1.3 The evidence in this report is not intended to be a comprehensive summary of all the potential impacts of commercial to residential PDR in London. Further details of the wider impacts of PDR are provided in the Mayor's response to the Housing, Communities and Local Government inquiry⁴.

1.2 Structure of the report

- 1.2.1 The report is structured as follows:
- Section 2 sets out the national policy context for the use of Article 4 Directions and the associated London Plan policy framework.
 - Sections 3 to 6 set out the strategic evidence to support the use of Article 4 Directions in the context of national policy and London Plan policy to:

¹ [Statutory Instrument 2021 No.428. The Town and Country Planning \(General Permitted Development etc.\) \(England\) \(Amendment\) Order 2021](#)

² A tool used by local planning authorities to remove some or all permitted development rights that apply to a particular site or area

³ There are 35 local planning authorities in London, comprising the 32 London boroughs, the City Corporation of London and two Mayoral Development Corporations

⁴ [Mayor of London. Response to Housing Communities and Local Government inquiry: permitted development. May 2021](#)

- safeguard London's nationally significant commercial, business and cultural districts including the whole of the Central Activities Zone (CAZ) and the Northern Isle of Dogs (Section 3)
 - safeguard strategically significant office locations outside of the CAZ and Northern Isle of Dogs (Section 4)
 - mitigate the impacts on London's vibrant town centres and high streets (Section 5)
 - mitigate the impacts on London's industrial areas and creative production space (Section 6).
- Section 7 of the report provides additional evidence with regard to relative capital values in residential use compared to a range of commercial uses in different parts of London.
 - Section 8 of the report provides additional evidence in relation to housing delivery and quality in London including in the areas where the Mayor would support Article 4 Directions.

2. National policy and London policy context

2.1 Introduction

2.1.1 This section sets out the shared national and London objectives for protecting and creating jobs and the delivery of new housing. It then sets out the national planning policy and London Plan policy context for the use of Article 4 Directions.

2.2 Protecting and creating jobs and delivering housing

2.2.1 Protecting and creating jobs are objectives shared by the government, the Mayor and the London Recovery Board to build a strong and competitive economy and drive the recovery from the economic impacts of the COVID-19 pandemic.

2.2.2 The government's objectives, set out in 'A Plan for Jobs'⁵, highlight the need to protect jobs in the hard-hit hospitality and accommodation sectors by supporting demand for these businesses, and to create jobs with action to get the property market moving and to increase and bring forward infrastructure investment.

2.2.3 The Mayor has made strong commitments⁶ to protect and create jobs, support new and growing businesses, revive central London and enable town centres and high streets to thrive. The Mayor also wants to help hospitality, night-time, retail, culture and creative sectors to recover from the pandemic and ensure London continues to attract investment, trade and visitors from across the world.

2.2.4 The London Recovery Board⁷, chaired jointly by the Mayor of London and the Chair of London Councils, brings together leaders from across London's government, business and civil society, as well as the health and education sectors, trade unions and the police, to oversee the long-term recovery effort. Its aims are to:

- reverse the pattern of rising unemployment and lost economic growth caused by the economic scarring of COVID-19
- support London's communities, including those most impacted by the virus
- help young people to flourish with access to support and opportunities

⁵ [HM Government. A Plan for Jobs 2020](#)

⁶ [Sadiq's Manifesto for London, 2021](#)

⁷ <https://www.london.gov.uk/coronavirus/londons-recovery-coronavirus-crisis/london-recovery-board>

-
- narrow social, economic and health inequalities
 - accelerate delivery of a cleaner, greener London.

2.2.5 From a spatial planning perspective, the protection of jobs and the realisation of future jobs growth is contingent on the careful management of development capacity and the balance of commercial uses with alternative land uses including housing. Targeted commercial to residential Article 4 Directions will be an important component in achieving this objective, protecting existing jobs and realising future jobs growth potential.

2.2.6 The Mayor also shares the government's objective to increase housing delivery and has identified a need for at least 66,000 new homes to be built per year in London, for at least the next 20 years. The Mayor's recently published London Plan 2021 sets out a strategic framework for providing over 52,000 homes per year, alongside the delivery of commercial development to support jobs and businesses across the capital. The Mayor is committed to utilising funding and planning powers to unlock housing development opportunities and increase supply of good quality homes that meet Londoners' diverse needs.

2.3 National policy related to Article 4 Directions

2.3.1 The National Planning Policy Framework (NPPF) sets out the government's planning policies for England and how these are expected to be applied.

2.3.2 On 1 July 2021, government announced a new Article 4 Direction policy through a written ministerial statement⁸ indicating that new paragraph 53 of the NPPF will read:

"The use of Article 4 directions to remove national permitted development rights should:

- where they relate to change from non-residential use to residential use, be limited to situations where an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre)
- in other cases, be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities)

⁸ <https://questions-statements.parliament.uk/written-statements/detail/2021-07-01/hcws145>

- in all cases, be based on robust evidence, and apply to the smallest geographical area possible.”

2.4 The London Plan 2021

2.4.1 The London Plan 2021⁹ is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and includes the Mayor’s vision for Good Growth¹⁰. The Plan is part of the statutory development plan for London, meaning that the policies in the Plan inform decisions on planning applications across the capital.

2.4.2 With regard to Article 4 Directions, the London Plan contains several policy provisions, set out below, which are directly relevant to this report.

2.4.3 In relation to **the Central Activities Zone (CAZ), Northern Isle of Dogs (NIOD) and London’s nationally significant office locations:**

“The Mayor will work with boroughs and support them to introduce Article 4 Directions to remove office to residential permitted development rights across the whole of the CAZ and the Northern Isle of Dogs (and those parts of Tech City and Kensington & Chelsea lying outside the CAZ).” (Policy SD5 E)

and

“The Mayor supports a co-ordinated approach to the introduction of Article 4 Directions by the CAZ boroughs [...] to ensure that London’s nationally-significant offices in and around the CAZ are safeguarded. Boroughs are encouraged to draw on both strategic and local evidence to support these Directions” (Paragraph 2.5.6).

2.4.4 With regard to **offices:**

“Existing viable office floorspace capacity [...] should be retained, supported by borough Article 4 Directions to remove permitted development rights where appropriate, facilitating the redevelopment, renewal and re-provision of office space where viable and releasing surplus office capacity to other uses.” (Policy E1 E)

and

⁹ [Mayor of London, The London Plan. The Spatial Development Strategy for Greater London, March 2021](#). Unless otherwise stated, references in this report to the “London Plan” or “the Plan” are referring to “The London Plan 2021”.

¹⁰ Good Growth refers to growth that is socially and economically inclusive and environmentally sustainable.

“Boroughs should consult upon and introduce Article 4 Directions to ensure that the CAZ, NIOD, Tech City, Kensington & Chelsea and geographically defined parts of other existing and viable strategic and local office clusters (such as those in and around the CAZ, in town centres and other viable business locations [...]) are not undermined by office to residential permitted development rights.” (Policy E1 F).

2.4.5 In relation to **town centres and high streets**:

“Boroughs should [...] introduce targeted Article 4 Directions where appropriate and justified to remove permitted development rights for office, light industrial and retail to residential in order to sustain town centre vitality and viability and to maintain flexibility for more comprehensive approaches to town centre housing and mixed-use intensification” (Policy SD9 D).

2.4.6 With regard to **industrial capacity**:

“Boroughs should ensure that the need to retain sufficient industrial and logistics capacity is not undermined by permitted development rights by introducing Article 4 Directions where appropriate” (Policy E4 G).

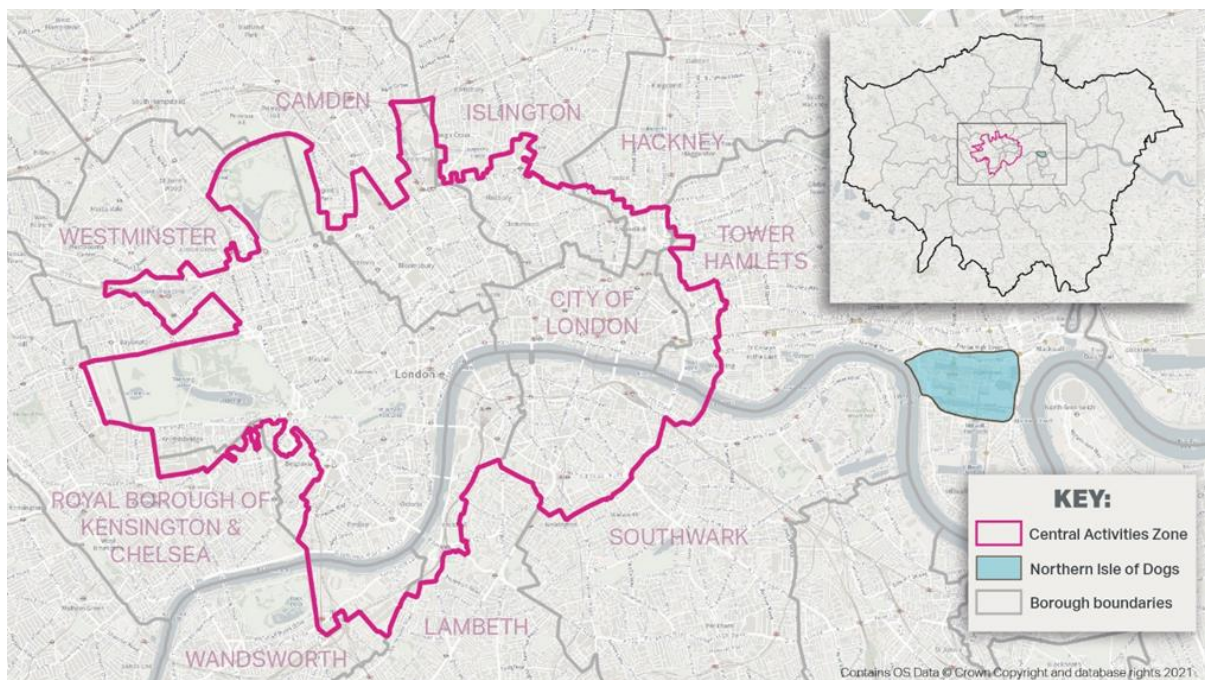
2.4.7 The above London Plan policies and the national policy framework provide the context for the strategic evidence to support London borough Article 4 Directions set out in the following sections of this report.

3. The Central Activities Zone and Northern Isle of Dogs

3.1 Introduction

- 3.1.1 The Central Activities Zone (CAZ) is the vibrant heart and globally-iconic core of London. It contains the seat of national government and is internationally renowned for its commerce, culture, night-time economy, tourism, shopping and heritage. Complemented by the Northern Isle of Dogs (NIOD) it is one of the world's most attractive and competitive business locations. It is home to approximately 300,000 residents¹¹ and it comprises an area of only 13 square miles (34 square kilometres) or just 2 per cent of the Greater London area.
- 3.1.2 The density, scale and mix of business functions and activities in the CAZ and NIOD are unique and are underpinned by the connectivity provided by public transport, walking and cycling networks. This agglomeration results in exceptional levels of productivity, which is not replicated elsewhere in the UK, and provides national benefits. It requires different or tailored approaches to the application of national policy – including permitted development rights - to respond to its distinct circumstances.

Figure 3.1 The CAZ and Northern Isle of Dogs



Source: GLA (boundaries indicative)

¹¹ Source: GLA analysis of [ONS Small Area Population Estimates](#)

3.1.3 The London Plan provides the strategic planning policy context for the CAZ and NIOD and co-ordinates planning for the Zone at the local level, which is the responsibility of ten local planning authorities, illustrated in Figure 3.1.

3.2 Contributions to the London and UK economy and employment

3.2.1 The CAZ and NIOD make an irreplaceable contribution to the output and prosperity of the nation. Figure 3.2 shows the ONS estimates of Gross Value Added (GVA) output for the local authorities that contain elements of the CAZ, the NIOD and their fringes. Together these ten local authority areas contributed £293 billion to the UK economy in 2019.

Figure 3.2: Calculations of London local authorities GVA(I) in 2019 (£ billion) for authorities within the CAZ and NIOD

Local authority	GVA (£ billion)	Local authority	GVA (£ billion)
Camden	35.5	Lambeth	13.1
City of London	69.2	Southwark	21.6
Hackney	8.9	Tower Hamlets	34.5
Islington	19.7	Wandsworth	7.9
Kensington and Chelsea	10.2	Westminster	72.4

Source: ONS Regional GVA by local authority (income approach)

3.2.2 Figure 3.3 shows GLA Economics' latest estimates of GVA for the CAZ, the NIOD and the fringes themselves. The estimates indicate that the output of the CAZ alone was £197 billion in 2019 and the NIOD contributed a further £17 billion. Together these locations account for almost half (46 per cent) of London's output and around 11 per cent of UK output.

Figure 3.3: Calculations of GVA(I) generated within the CAZ, NIOD, and their 1km fringe in 2019

Area	GVA (£ billion)	% London GVA	% UK GVA
CAZ	197.1	42%	10%
CAZ and 1km Fringe	236.5	51%	12%
NIOD	16.7	4%	1%
NIOD and 1km Fringe	20.3	4%	1%
CAZ and NIOD	213.8	46%	11%
CAZ, NIOD & a 1km Fringe	256.8	55%	13%

Source: ONS Regional GVA by local authority (income approach), ONS Business Register and Employment Survey, GLA Economics calculations

3.2.3 There is also a substantial amount of commercial activity just outside the CAZ boundary including other nationally significant office locations such as Tech City¹² and the Royal Borough of Kensington & Chelsea (see Section 4); other strategically significant office locations and town centres (Sections 4 and 5) and strategically important industrial capacity providing essential supporting functions to service the needs of the CAZ and NIOD (Section 6). In total, the output of the CAZ, NIOD and a 1km fringe around them stood at just under £257 billion in 2019 accounting for 55 per cent of London's output and around 13 per cent of UK output. These figures were estimated by GLA Economics using the same methodology¹³ described in GLA Economics Working Paper 68.¹⁴

3.2.4 The most recent data on employment¹⁵ indicates that there were 2.2 million workforce jobs in the CAZ in 2019 and a further 165,000 in the NIOD. The combined total of 2.4 million represents 39 per cent of London's total employment in 2019 and an increase of 13 per cent since 2015.

¹² Located within the London boroughs of Hackney, Islington and Tower Hamlets

¹³ This first involved identifying the local super output areas (LSOA) – a geographical classification used in official statistics – for the Central Activities Zone and Northern Isle of Dogs. Then the employment shares of these LSOAs are calculated as a percentage of the relevant local authority on an industry basis. These employment shares were then applied to gross value added (GVA) estimates for the local authorities and summed.

¹⁴ [GLA Economics. Working Paper 68: Work and life in the Central Activities Zone, the Northern Isle of Dogs and their fringes, August 2015](#)

¹⁵ Source: GLA Economics analysis of 2019 BRES data

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- 3.2.5 Research by the GLA¹⁶ indicates that the top five sectors of employment in this combined area are professional, scientific and technical; financial & insurance; information & communication; business administration and support services; and accommodation & food services. Employment in these sectors is typically accommodated in uses found within the commercial, business and service Use Class E.

3.3 Nationally and internationally significant office locations

- 3.3.1 The London Plan identifies the CAZ and NIOD as nationally and internationally significant office locations.¹⁷ These locations were also recognised as nationally significant office locations by government when exemptions were granted to office to residential permitted development rights when they were first introduced in 2013. The relevant London boroughs introduced office to residential Article 4 Directions for these areas when the exemptions were removed in May 2019.¹⁸ The evidence presented in this report indicates that the underlying justification for Article 4 Directions to cover the whole of the CAZ and NIOD remains as pertinent today as it was in 2019 and indeed since 2013 when PDR was first introduced.
- 3.3.2 Current evidence continues to support the status of the CAZ and NIOD as internationally significant office locations. The ten CAZ boroughs (incorporating much of London's internationally significant office space) contained more than 20 million sq.m. of office floorspace in 2020.¹⁹ This equates to more than three quarters of London's total office stock and approximately one fifth of the total in England and Wales (Figure 3.4).²⁰ It is estimated that the CAZ and NIOD together contain more than 1.3 million office jobs.²¹
- 3.3.3 Important economic sectors in the CAZ including tech, media, architecture, creative and life sciences can require complex and high specification offices, studios and lab space, which can take much longer to build (or retrofit) than a traditional office. It is imperative that such workspace (which sits within new Class E) is safeguarded from ad hoc conversions to residential through permitted development.

¹⁶ GLA Economics, *ibid*

¹⁷ The London Plan 2021, *op cit*, paragraph 6.1.1

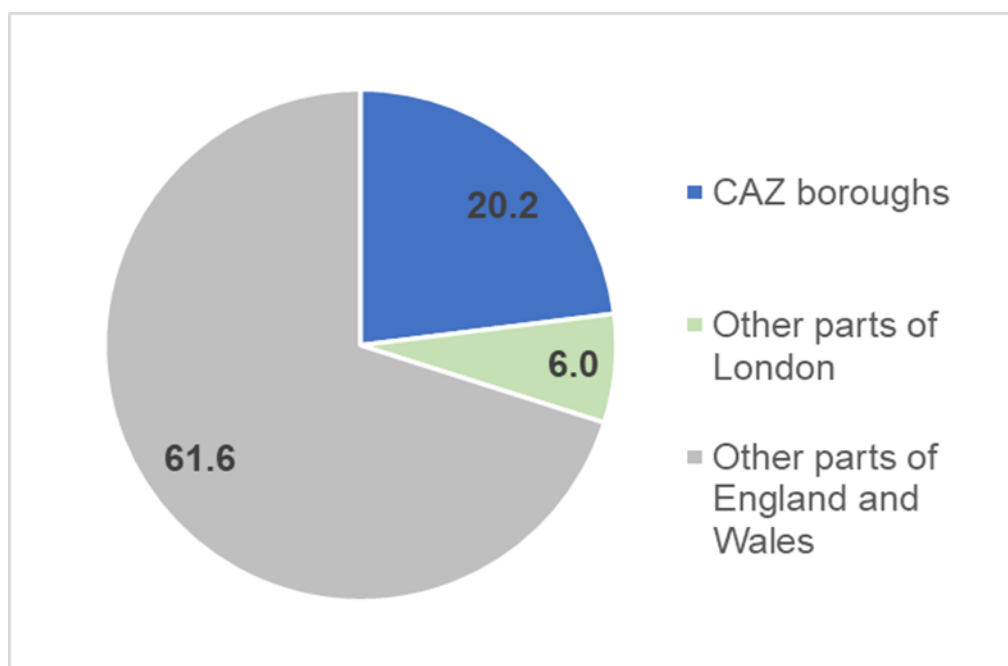
¹⁸ The precise boundaries are contained in the Article 4 Direction made by each borough.

¹⁹ Source: [VOA Non-domestic rating stock of properties 2020](#)

²⁰ Source: GLA analysis of VOA Non-domestic rating stock of properties 2020 *op cit*.

²¹ Source: [Ramidus Consulting, London Office Policy Review, June 2017](#)

Figure 3.4: Office floorspace stock in the CAZ boroughs relative to other parts of London and England and Wales, 2020 (million square metres)



Source: VOA Non-domestic rating stock of properties 2020

- 3.3.4 Taking into account projected growth in office employment, employment densities and emerging trends in homeworking, research for the GLA in 2017 indicated that there is demand for around 3.5 million sq.m of office floorspace in the CAZ and NIOD combined over the period 2016-2041. The study included a series of sensitivity tests around the central employment-based forecast looking at different levels of employment growth, alternative employment density ratios and desk-sharing/homeworking ratios.
- 3.3.5 While there are emerging trends that could affect the nature of office working and the extent of remote working, as well as broader cyclical and structural shifts in demand for office space as a result of the pandemic, the extent of this and its impact on the need for office space in London has yet to emerge fully. However, the CAZ Economic Futures work undertaken by Arup, Gerald Eve and LSE²² identified a wide variety of potential scenarios, including situations where office demand remains high. The potential impacts of the pandemic and the CAZ Economic Futures work is explored in more detail in Section 3.8.

²² [Central Activities Zone \(CAZ\) Economic Futures Research, 2021](#)

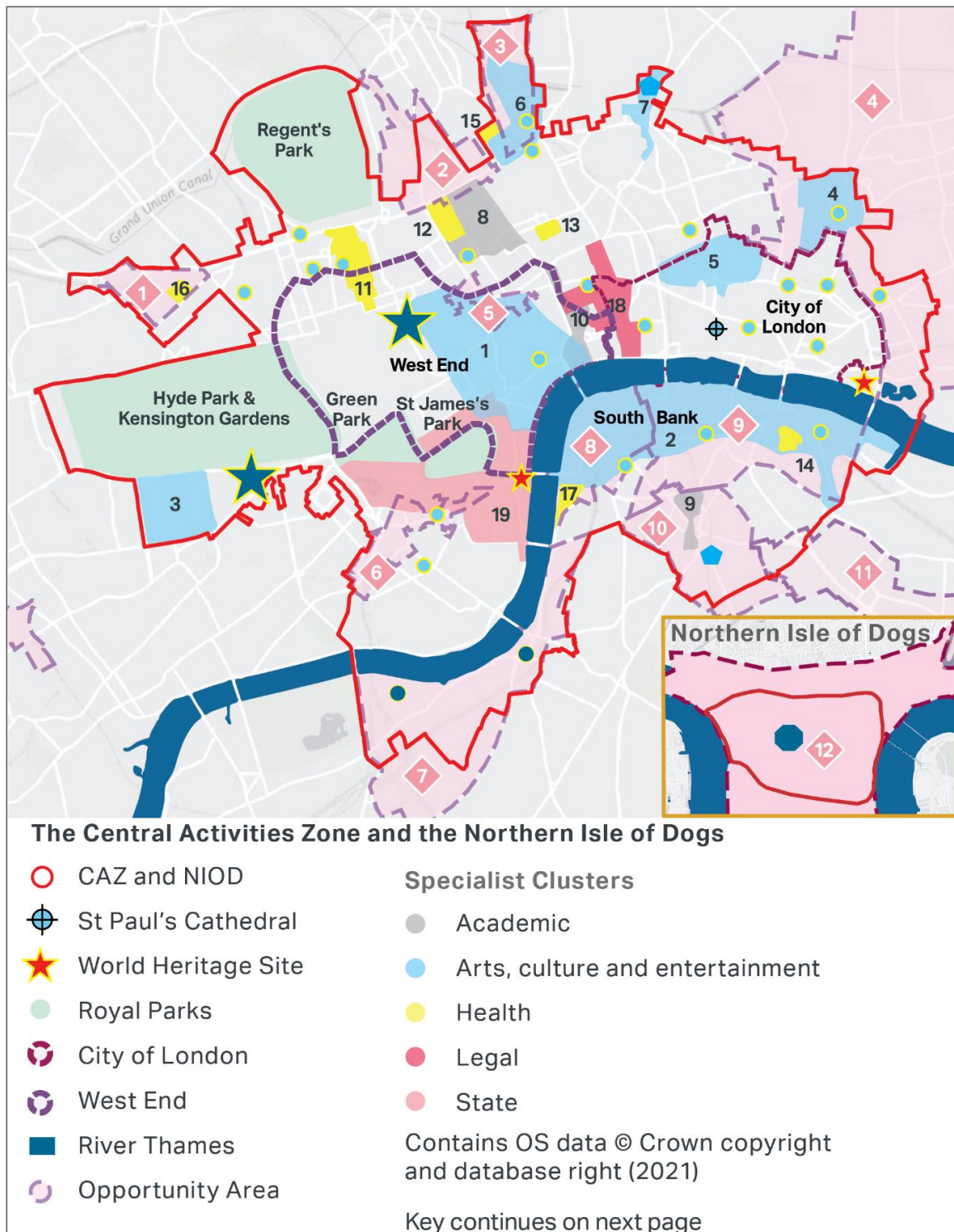
3.4 Strategic functions and clusters

- 3.4.1 The CAZ performs a unique mix of international, national and London-wide roles, based on an agglomeration and rich mix of strategic functions and local uses. Many of the strategic functions – such as those associated with business, professional and financial services, technology, law, health and life sciences, media, communications and centres of excellence for research – take place in offices (now incorporated into Use Class E).
- 3.4.2 Other strategic functions of the CAZ – such as leisure, entertainment, retail and tourism and specialist creative industries for example clothing, fashion, jewellery, printing, antiques, musical instruments, art and culture - are also accommodated in uses within Use Class E or could be impacted by Class E to residential PDR, including sensitive cultural venues and night-time economic activities such as theatres and music venues for example. The use of Article 4 Directions to remove permitted development rights from uses in Class E to residential is essential to enable these sectors to continue to flourish in the CAZ, both for the benefits that they provide in their own right as well as for the contribution that they make to the vibrancy of the CAZ itself.
- 3.4.3 Within the CAZ, there are several prominent clusters of strategic functions which include offices, research & development, retail and leisure uses in Class E. Several of these clusters are reflected in the London Plan CAZ Diagram (reproduced in Figure 3.5).
- 3.4.4 The **City of London** is a nationally important location for globally-oriented financial and business services. It is the home of many of the world's leading financial markets including the London Stock Exchange, London International Financial Futures and Options Exchange (LIFFE), Lloyds of London insurance market, the maritime Baltic Exchange and the London Metal Exchange. In 2019, the City is estimated to have contributed more than £69 billion in output, some 15 per cent of the London economy and 3.5 per cent of the UK economy²³. In the same year, the City alone accounted for more than 677,000 workforce jobs.²⁴

²³ Source: GLA Economics analysis of 2019 ONS output data






²⁴ Source: GLA Economics analysis of 2019 BRES data

Figure 3.5 The London Plan CAZ Diagram showing prominent clusters of CAZ strategic functions and specialist clusters

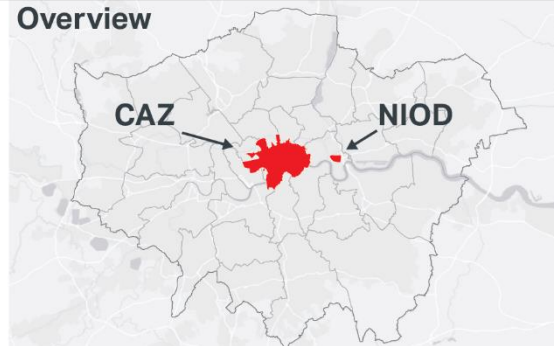


CAZ Diagram - Additional key

Retail Clusters and Town Centres

-  International
-  Metropolitan
-  Major
-  CAZ retail cluster
-  Potential CAZ retail cluster













Overview



Specialist Clusters

1. West End (including Soho / Covent Garden)
2. South Bank, Bankside and London Bridge
3. Royal Albert Hall / South Kensington Museums
4. Shoreditch
5. Barbican / Smithfield / Farringdon
6. King's Cross
7. Angel / Sadler's Wells
8. University College London / University of London
9. Southbank University
10. LSE / King's College London
11. Harley Street
12. University College Hospital
13. Great Ormond Street Hospital
14. King's College London Guy's Campus
15. Francis Crick Institute
16. St Mary's Hospital cluster
17. St Thomas' Hospital
18. Temple, Royal Courts of Justice, Inns of Court
19. Royal Palaces, Palace of Westminster and Whitehall

Opportunity Areas

-  1 Paddington
-  2 Euston
-  3 King's Cross
-  4 City Fringe / Tech City
-  5 Tottenham Court Road
-  6 Victoria
-  7 Vauxhall, Nine Elms and Battersea
-  8 Waterloo
-  9 London Bridge Bankside
-  10 Elephant and Castle
-  11 Old Kent Road
-  12 Isle of Dogs

- 3.4.5 The **Northern Isle of Dogs** – along with the City of London – is a nationally-important location for globally-oriented financial and business services. The NIOD contains 165,000 workforce jobs²⁵ of which around 85 per cent are estimated to be office-related jobs²⁶. Although it is geographically separate from the CAZ it is treated as part of the CAZ in London Plan policies and formally recognised as a CAZ ‘satellite’ location for world city office functions. With its excellent public transport connectivity and significant development site availability²⁷ it provides strategically important capacity for office demand that may not be accommodated within the CAZ itself due to its capacity constraints²⁸. Canary Wharf, which lies at the heart of NIOD, is classified as a Metropolitan town centre in the London Plan, reflecting the scale and range of office, retail, leisure and complementary service uses present.
- 3.4.6 The **West End** is a vibrant mixed-use business location of international significance, a globally renowned shopping, cultural and visitor destination and home to several world-leading academic institutions. Westminster’s economy – the majority of which sits within the West End – made an estimated contribution of £72 billion to national output in 2019²⁹, with the West End’s retail district alone seeing (pre-pandemic) sales at £9 billion³⁰. In 2019, London accounted for 55 per cent of all inbound visitor spend to the UK³¹, with the shopping, leisure and tourism offer of the West End and Knightsbridge playing a significant role in the attractiveness of the capital to international visitors.
- 3.4.7 The CAZ contains a wide range of **specialist clusters of activity** which contribute towards the capital’s international and national roles including:
- Tech City (see Section 4)
 - The arts, cultural and creative clusters in Soho/West End, the South Bank, Shoreditch, Barbican, Smithfield, Farringdon, South Kensington, King’s Cross (including the Knowledge Quarter), Angel and London Bridge

²⁵ Source: GLA Economics analysis of 2019 BRES data

²⁶ Source: [Ramidus Consulting, London Office Policy Review, June 2017](#)

²⁷ [Mayor of London. Isle of Dogs and South Poplar Opportunity Area Planning Framework, September 2019](#)

²⁸ [CAG Consultants. London Employment Sites Database, May 2017](#) ; [Ramidus Consulting, London Office Policy Review, June 2017](#)

²⁹ Source: GLA Economics analysis of ONS output data

³⁰ [West End Good Growth: Identifying future growth scenarios for Oxford Street and the West End, 2018](#)

³¹ Source: Visit Britain <https://www.visitbritain.org/visitor-economy-facts>

- Centres of medical excellence and life sciences research linked to the Knowledge Quarter³² around the Euston Road including the University College Hospital, the Wellcome Trust and the Francis Crick Institute (and just outside the CAZ at Whitechapel and White City)
- Academic clusters including for example UCL and the University of London in Fitzrovia, LSE and King's College around Temple, and the Southbank University cluster at the Elephant & Castle
- Legal clusters around Temple, the Royal Courts of Justice and the Inns of Court.

3.4.8 The erosion of capacity in the business, commercial and service use class would undermine the evolution and development of these clusters which require careful management of the balance between the CAZ strategic functions and residential development to ensure their success. In the case of the arts, cultural and creative clusters and activities, the introduction of ad hoc residential development can have significant impacts, particularly on cultural and night-time economic uses. This can result in the curtailment of such activities both directly through the loss of space and indirectly, particularly where residential uses compromise the operation of existing and future cultural activities, some of which operate late into the night and some on a 24-hour basis.

3.4.9 In addition to the specialist clusters there are several **CAZ retail clusters** which are distributed widely across the Zone. The most significant CAZ retail clusters are identified in the CAZ Diagram (see Figure 3.5). Evidence from the 2017 Town Centre Health Check³³ illustrates that the CAZ retail clusters are healthy and include a diverse range of commercial, business and service uses including retail, financial and professional services, cafes and restaurants, offices and night-time economy uses and serve residents, workers and visitors to the CAZ.

3.4.10 Furthermore, there are 12 **Opportunity Areas**³⁴ lying either wholly or partly within the CAZ (including NIOD). Together these Opportunity Areas contain development capacity for more than 262,000 additional jobs and 91,000 new homes (see Figure 3.6). There is a risk that the new Class E to residential PDR (in the absence of Article 4 Directions) could undo the careful work of years of master-planning and place-making in these Opportunity Areas which have brought forward a mix of both residential and employment in places well-connected to public transport. Offices and other commercial uses

³² <https://www.knowledgequarter.london/>

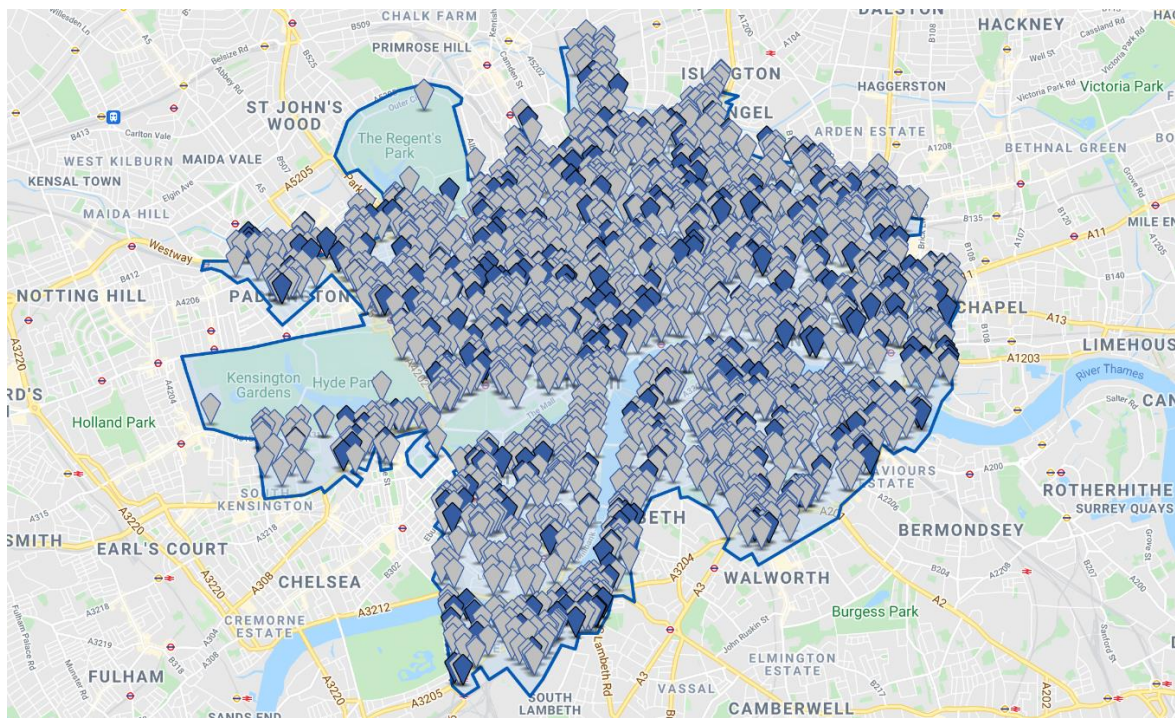
³³ [Mayor of London. 2017 London Town Centre Health Check Analysis Report. January 2018](#)

³⁴ London's principal opportunities for accommodating large scale development to provide substantial new employment and housing with a mixed and intensive use of land and assisted by good public transport accessibility. See 2021 London Plan (Policy SD1).

could be converted to residential use, undermining efforts to create vibrant mixed-use areas with high quality employment opportunities.

- 3.4.11 Commercial, Service and Business uses in the new E Use Class are distributed widely across the whole of the CAZ (with the exception of the Royal Parks), including areas of the Zone that are predominantly residential in nature such as Pimlico for example. Figure 3.7 provides an illustration of the distribution of commercial uses in the CAZ drawing on evidence from the CoStar commercial database.
- 3.4.12 In this section the evidence demonstrates that **the CAZ is more than the sum of its parts**. It is the rich mix of strategic and local functions distributed across the entire Zone and the scale and variety of interrelated and overlapping strategic clusters of activity, that make it unique in a London and national context. This strategic evidence supports a CAZ-wide approach to the introduction of Article 4 Directions by the relevant local planning authorities representing the smallest geographical area possible in the terms of national policy.

Figure 3.7 Distribution of commercial uses in the Central Activities Zone



Source: CoStar (May 2021). Blue diamonds are commercial properties for sale or to let. Grey diamonds are other commercial properties on the database. Note that this Figure is illustrative and does not show all the commercial properties recorded in the CoStar database.

3.5 Agglomeration benefits

- 3.5.1 The concentration of offices and other types of commercial, business and service uses within the CAZ and NIOD give rise to what are termed economies of agglomeration. Agglomeration refers to the concentration of economic activity in a particular location or area.
- 3.5.2 Agglomeration benefits arise because firms increase their productivity levels by being located in close proximity to one another and by having access to a large pool of labour enabling businesses to attract and retain skilled labour. Clustering and agglomeration offer several other benefits including fostering collaboration and the transfer of knowledge, innovation and technology between business and sectors, and promoting competition which drives efficiency and London's global competitiveness.
- 3.5.3 It is the significant concentration of office-based activities combined with its character and global reputation for business, shopping, culture, tourism and heritage that make the CAZ unique in a London, national and international context. The connectivity of public transport in the CAZ is widespread, high frequency and high capacity. Prior to the coronavirus pandemic, the rail, underground, road, bus, river, walking and cycle networks facilitated around 3.5 million trips to, from and within the central London boroughs on a daily basis. Around 90 per cent of trips to the CAZ in the morning peak were made by public transport modes and rail-based transport accommodated 80 per cent of the 1.2 million trips to the CAZ in the morning peak.³⁵
- 3.5.4 Whilst the global pandemic has led to widespread disruption and change to travel in London³⁶ and there remains uncertainty around the longer-term impacts of the pandemic on travel demand, it is expected that the transport connectivity and capacity provided by the rail network and TfL's tube, rail and DLR services will continue to play a primary role in facilitating employment in all of London's nationally significant office locations. In addition, the bus network plays an essential role in enabling lower income workers living in inner and outer London to access employment in the CAZ in activities which support the wider CAZ ecosystem including the hospitality sector for example.
- 3.5.5 These networks, complemented by active modes including cycling and walking, provide the concentrations of business activity in the CAZ with a huge labour market catchment across London and beyond. They also drive the agglomeration economics that benefit businesses there, allowing them to play a unique economic role within the UK. The connectivity and agglomeration benefits will be strengthened further with new infrastructure

³⁵ Mayor of London. Central Activities Zone Supplementary Planning Guidance, March 2016

³⁶ [Transport for London. Travel in London report 13, 2020](#)

including, for example, the Elizabeth line, Thameslink Programme, Northern Line Extension and the Underground investment programme.

3.6 Contributions to strategic infrastructure

- 3.6.1 The Mayoral Community Infrastructure Levy (MCIL)³⁷ applies to CIL liable developments in London granted planning permission on or after 1 April 2012. MCIL raises money towards financing the Elizabeth line (currently being built by Crossrail Ltd) and is collected by the 35 local planning authorities in London on behalf of the Mayor.
- 3.6.2 On 1 April 2019, the Mayor's new charging schedule MCIL2 took effect. MCIL2 superseded MCIL1 and the Crossrail Funding Supplementary Planning Guidance (SPG) and applies to planning permissions granted from 1 April 2019. In addition to the London borough and Mayoral Development Corporation charge bands, there are specific MCIL2 charging rates for office, retail and hotel uses in central London and the Isle of Dogs. It should be noted that MCIL1 and Crossrail section 106 SPG obligations may continue to apply to some phased planning permissions granted before 1 April 2019.
- 3.6.3 Given the scale of office development in the CAZ and NIOD, the introduction of Article 4 Directions to remove Class E to residential permitted development rights in these areas would enable financial contributions towards the delivery of strategic transport infrastructure to be collected through conventional planning approvals. This essential infrastructure will support the agglomeration of business functions in these areas (see section 3.5 above).
- 3.6.4 By contrast, if Class E to residential permitted development were to apply in these areas it could encourage the conversion of commercial, business and service uses to residential rather than their redevelopment for new commercial space and reduce the potential contributions to support strategic infrastructure. This is because the local planning authority cannot secure planning obligations in respect of matters that are not subject of the prior approval process, including affordable housing for example. Also, while permitted development rights provide no exemption from CIL, in most cases the development will satisfy the in-use building test and therefore have a nil CIL liability.

³⁷ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/mayoral-community-infrastructure-levy#Stub-63731>

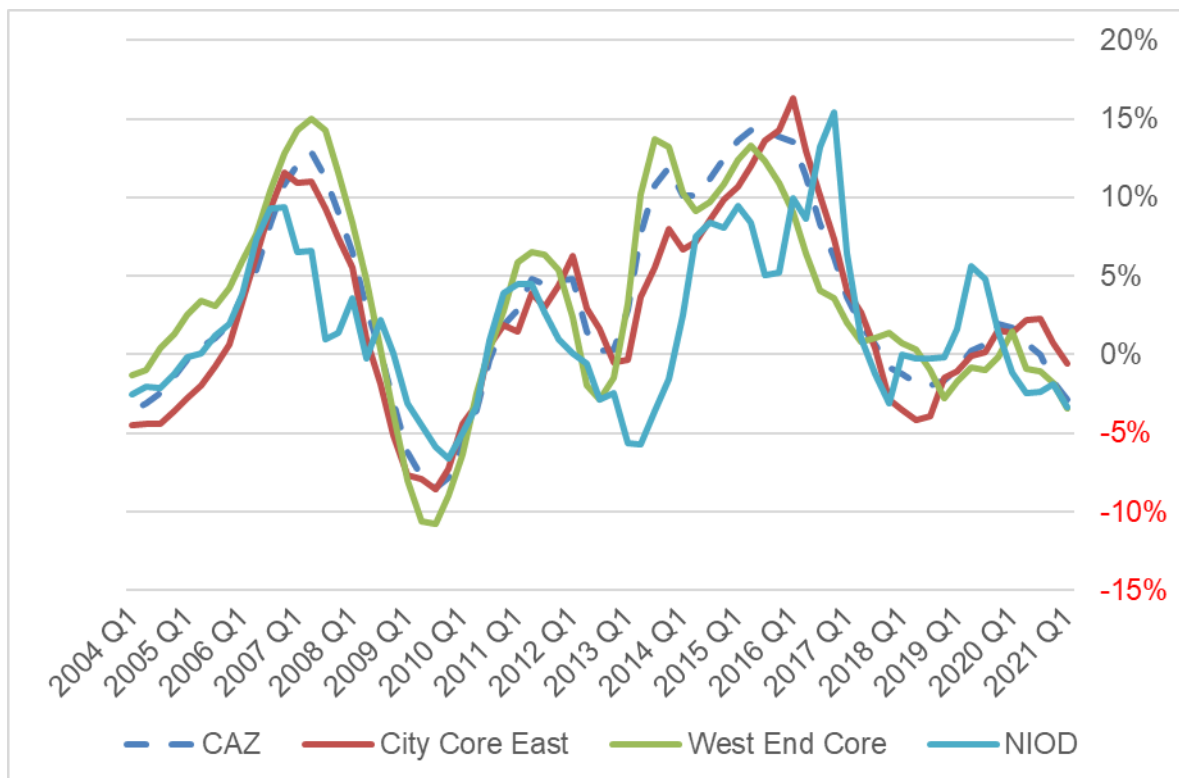
3.7 Property market dynamics

- 3.7.1 Spatial planning provides an important mechanism to ensure that there is sufficient office capacity through the existing stock and the planning pipeline to maintain an appropriate level of choice for occupiers in terms of location, type of space and cost. This section of the report provides strategic evidence on property market dynamics in central London (and its sub-markets where data is available) including trends in the stock, rental growth, availability/vacancy and the relationship between development starts and the planning pipeline. Further details on average capital values in different types of commercial property relative to residential are provided in Section 7 of this report.
- 3.7.2 Given the unprecedented uncertainty associated with the impact of the COVID-19 pandemic, care must be taken when interpreting data on property market indicators at the present time. The analysis below is based upon a factual assessment of the available data and is not intended to be an assessment of the impact of the pandemic on the central London office market.
- 3.7.3 **Office Stock:** In 2020, the ten CAZ boroughs combined contained 20.2 million sq.m of office floorspace, which accounts for 77 per cent of the London total and 23 per cent of the total for England and Wales³⁸. The stock of offices in the ten CAZ boroughs increased by 14 per cent since 2001 at an average rate of around 125,000 sq.m per annum.
- 3.7.4 **Office rental growth:** Figure 3.8 illustrates the fluctuations in office rental growth in the CAZ and NIOD across business cycles with strong rental growth in the early 'noughties' followed by a sharp downturn in rents following the 2008 global financial crisis. Rents then recovered strongly up to 2017 (notably in the West End and City Core sub-markets) followed by marginal declines in 2018. Since the unprecedented shock of the coronavirus pandemic and the subsequent recession, office rents in central London have declined on average by around 3 per cent between 2020 and 2021 (except for the City Core which CoStar data suggests has declined more modestly). Figure 3.8 illustrates however that in the context of the past two decades the recent decline in rents is not significant, particularly when compared with the aftermath of the 2008 global financial crisis. Recently, central London agents are reporting more positive signs for the central London office market.³⁹

³⁸ Source: [VOA Non-domestic rating stock of properties 2020](#)

³⁹ [Savills. West End investment watch May 2021.pdf](#) ; [Savills. City office market watch April 2021.pdf](#)

Figure 3.8 Central London rental growth (year-on-year) 2004 – 2021



Source: CoStar

3.7.5 Office vacancy: The planning process provides an important mechanism to ensure that there is sufficient office capacity (through the existing stock and the planning pipeline) to maintain an appropriate level of choice for occupiers in terms of location, type of space and cost. A vacancy rate of around 8 per cent in central London has been identified as an indication of the market being broadly in balance. When vacancy rates rise above 8 per cent it is regarded as offering occupiers a wider choice of accommodation, and a tendency for rents to fall, whereas vacancy rates below 8 per cent reflect a narrowing of choice for occupiers and rents tend to rise.⁴⁰

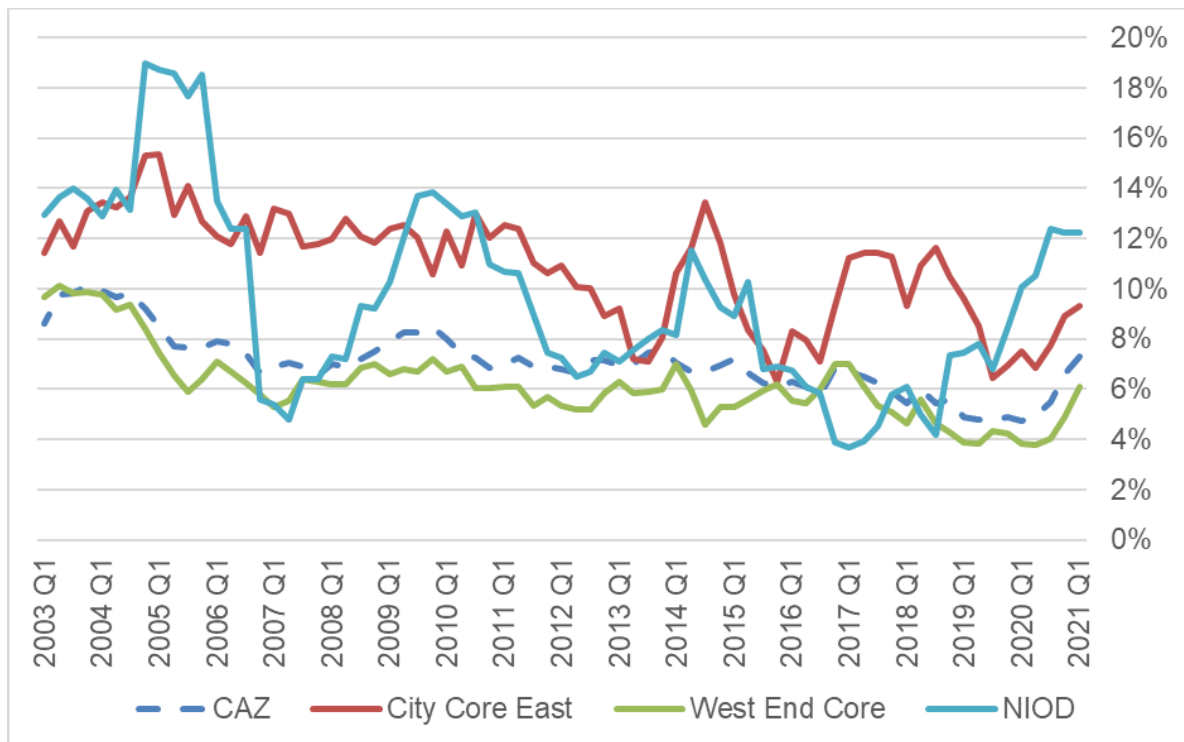
3.7.6 Figure 3.9 shows the long-run trends in office vacancy rates in central London and selected sub-markets. There is an indication of rising vacancy rates since the onset of the pandemic, but seen in their historical context these rates do not appear excessive and are currently on par with the equilibrium benchmark of 8 per cent. For the CAZ as a whole, the current average vacancy rate of 7.9 per cent (based on CoStar data) is only marginally above the long-term average of 7.1 per cent (2003-2021). In the core West End sub-market vacancy rates have risen from recent lows of 4

⁴⁰ Source: [Ramidus Consulting, London Office Policy Review, June 2017](#)

per cent and remain around the long-run average for this sub-market. In the City Core vacancy rates according to CoStar are around 9 per cent.

- 3.7.7 Vacancy rates in the NIOD have been fairly volatile, owing in part to the size of individual offices relative to the total stock and due to large amounts of space put back on the market in the wake of the ‘dot-com’ crash in the early 2000s and the Global Financial Crisis in 2008⁴¹. Illustrative of this volatility, the current (2021) vacancy rate is estimated at around 12 per cent (based on CoStar data), compared to only 4 per cent in 2018. The current NIOD vacancy rate however is lower than peaks witnessed in the past (for example 19 per cent in 2004 and 14 per cent in 2009). Within the NIOD the office vacancy rate for Canary Wharf is estimated at around 9 per cent according to a recent agent report⁴² and lower than that suggested by CoStar for the NIOD as a whole. Over the past two decades the NIOD, just like the CAZ itself, has proved resilient and vacancy rates have fallen dramatically from previous peaks as illustrated in Figure 3.9.
- 3.7.8 As noted above considerable care must be taken when interpreting data on property market indicators including vacancy data at the present time given the unprecedented uncertainty associated with the impact of the pandemic.

Figure 3.9 Central London office vacancy rates 2003 – 2021



Source: CoStar

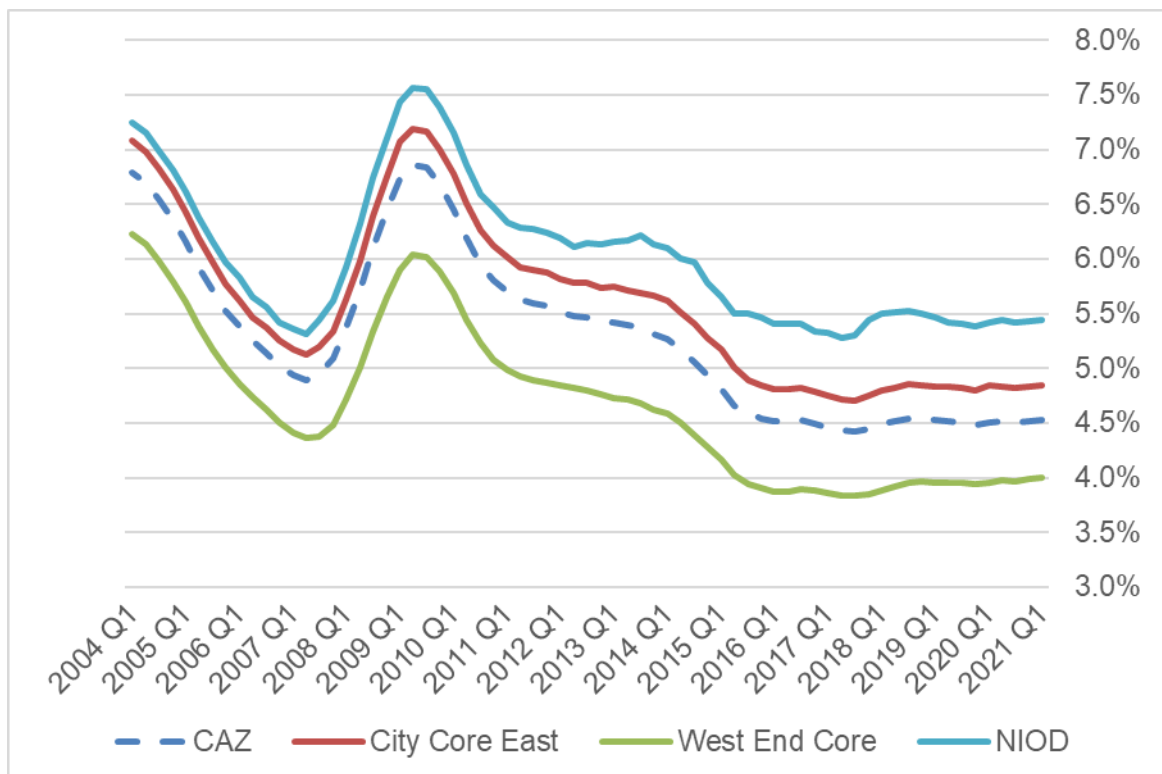
⁴¹ Source: [Ramidus Consulting, London Office Policy Review, June 2017](#)

⁴² [Knight Frank. London offices spotlight Q1 2021.pdf](#)

3.7.9 **Office market yields:** Figure 3.10 illustrates office market yields in central London over the period 2004 to 2021. Yields are a measure that reflects the annual rental income compared to the value of a property. Low yields tend to reflect greater investor confidence in an asset. The global financial crisis in 2008 had a marked impact on central London office yields rising from 5 per cent to around 7 per cent on average. Since then, central London office yields have fallen steadily averaging 4.5 per cent in the CAZ (on average) and 5.5 per cent in NIOD.

3.7.10 The West End Core office yield is currently 4 per cent according to CoStar data. It is notable that unlike after the 2008 financial crisis, central London office yields have not increased substantially following the onset of the coronavirus pandemic. There are indications that investor confidence in central London office sub-markets is growing⁴³ and take-up in the City in the first quarter of 2021 was the highest since the first lockdown in March 2020.⁴⁴

Figure 3.10 Central London office market yields 2004 – 2021



Source: CoStar

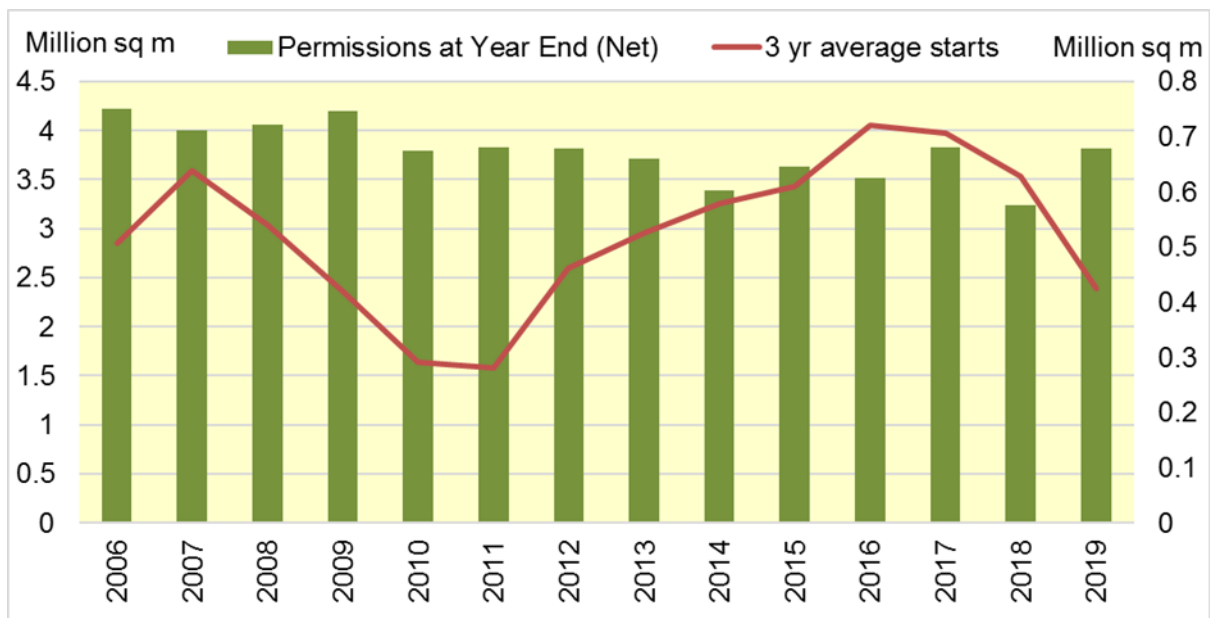
⁴³ [Savills. West End investment watch May 2021.pdf](#)

⁴⁴ [Savills. City office market watch April 2021.pdf](#)

3.7.11 **Office development starts⁴⁵ and pipeline⁴⁶**: Figure 3.11 shows the level of starts since just before the global financial crisis, through to 2019. As can be seen, average three year starts fell sharply between 2008 and 2010 following the recession. Starts then lifted again in 2012, rising for four years. Since 2016 the three-year average has been falling and in 2019 it was at its lowest level since 2012. It is anticipated that the figures for starts in 2020 and 2021 will be impacted by the coronavirus pandemic.

3.7.12 Unimplemented office permissions at the end of 2019 totalled 3.8 million sq.m according to the EGi data (compared to 3.2 million sq.m at the end of 2018). The 2019 figure compares to a ten-year average of 3.7 million sq.m and a long run average of 3.5 million sq.m, putting the 2019 figure well above trend.

Figure 3.11 Comparison of office planning permissions and three-year average starts, central London, 2006-2019*



Source: Ramidus Consulting, EGi London Offices

* Planning permissions - left hand axis; 3-year average starts right hand axis

3.7.13 Figure 3.12 illustrates the ratio between unimplemented planning permissions and three-year average starts in central London over the period 2004 to 2019. This ratio been used as a benchmark in London Plan Annual

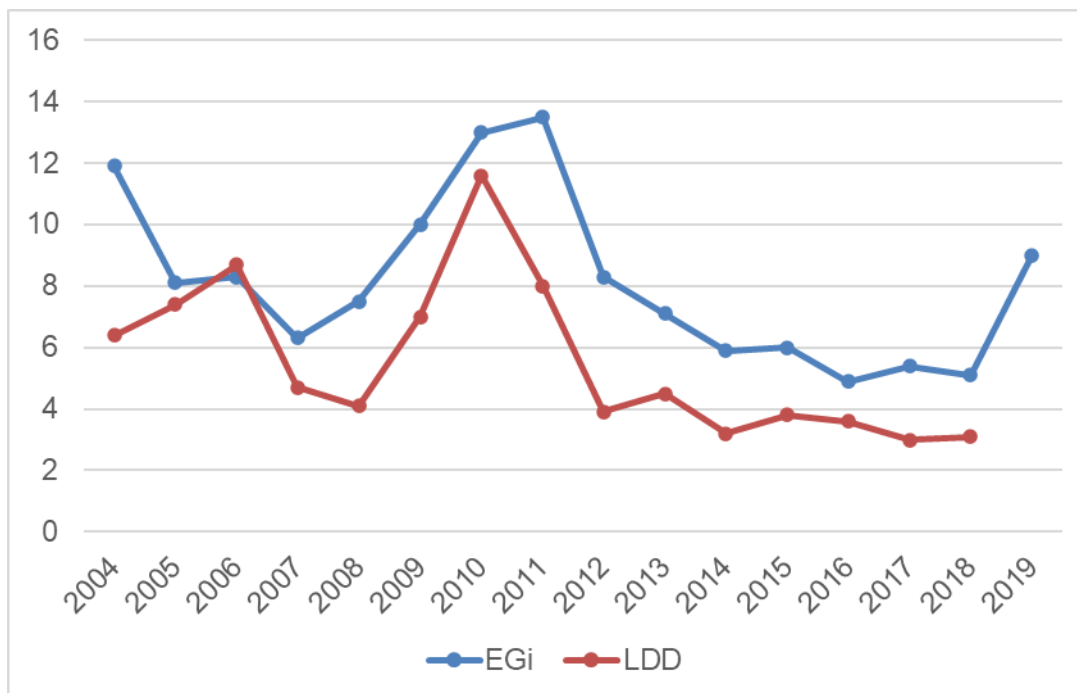
⁴⁵ Recorded when the planning permission is implemented and development 'starts' on site

⁴⁶ A measure of the stock of office floorspace in planning permissions not 'started'

Monitoring Reports⁴⁷ to ensure that there is sufficient development capacity in the office market. According to the EGi data, the ratio of the stock of office planning permissions granted to average three-year starts at end of 2019 rose to 9.1:1. This is the highest ratio since the peak years of 2009 to 2011, when it rose largely in response to the global financial crisis and a large number of scheme starts are assumed to have been delayed. It fell steadily thereafter, until 2019.

3.7.14 In the most recent set of comparable figures for the two databases, for 2018, the ratio of planning permissions to starts was 5.1:1 according to EGi and 3.1:1 according to LDD. These ratios are all above the monitoring benchmark of 3.0:0 indicative of a healthy planning pipeline in relation to average starts.

Figure 3.12 Ratio of office floorspace planning permissions to three-year average starts in central London, 2004-2019



Source: Ramidus Consulting, EGi London Offices, London Development Database

3.8 Impacts of the pandemic

3.8.1 The CAZ faces a significant challenge as a result of the pandemic and associated lockdown measures, characterised by a reduction in office workers commuting to their usual places of work, a sharp halt to domestic

⁴⁷ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/monitoring-london-plan>

and international tourism, and changes to how Londoners spend their leisure time.

- 3.8.2 In November 2020, the GLA appointed Arup, together with Gerald Eve and the London School of Economics, to carry out a piece of research looking at the different economic futures facing the CAZ. The study⁴⁸ developed a robust evidence base to help us understand the nature and extent of the medium and long-term economic transformation facing the CAZ and London and a whole.
- 3.8.3 The Interim Report⁴⁹, published in February 2021, shows that the impact of the pandemic has been profound. The hospitality and accommodation sectors in the CAZ and NIOD have been impacted particularly hard by the pandemic and the associated lockdown measures, due to the reduction in the number of daytime office workers alongside the reduction in international and domestic visitors. London's important arts and cultural sectors, including the night-time economy, are particularly at risk. GLA Economics estimate a £10.9 billion loss in tourism expenditure in the CAZ (£3.5 billion domestic and £7.4 billion inbound) and a further £1.9 billion loss in expenditure from commuters to the CAZ (£1.4 billion of this expenditure is from commuters from London and £0.5 billion is from commuters outside of London).⁵⁰
- 3.8.4 To attract domestic visitors to London the Mayor launched a new 'Let's Do London' campaign⁵¹ which brings together the capital's world-leading hospitality, culture, nightlife and retail venues to promote all London has to offer. For overseas tourism the underlying fundamentals of London's attractiveness remain strong and, as coronavirus restrictions on international travel ease, we can expect this source of spend to recover over time.
- 3.8.5 Phase 2 of the CAZ economic futures work built three scenarios to test the scale of the economic impact on the CAZ over the medium and long-term. The Phase 2 report⁵² concluded that in the long term, if the right action is taken, central London will be well placed to recover strongly. Its diverse ecosystem with a unique combination of world-leading business, retail, culture, government, education and other anchor institutions will continue to be the beating heart of London's and the UK economy.

⁴⁸ [Central Activities Zone \(CAZ\) Economic Futures Research, 2021](#)

⁴⁹ [ARUP, Gerald Eve, LSE. The Economic Future of the Central Activities Zone. Phase 1 Report, February 2021](#)

⁵⁰ [GLA Economics. Lost worker vs. tourism expenditure in the Central Activities Zone, October 2020](#)

⁵¹ [Mayor of London announces plans for biggest domestic tourism campaign](#)

⁵² [ARUP, Gerald Eve, LSE. The Economic Future of the Central Activities Zone. Phase 2 Report, March 2021](#)

3.9 Potential impacts of permitted development rights

- 3.9.1 In the absence of Article 4 Directions, the new Class E to residential permitted development rights could threaten the future sustainability of the CAZ and NIOD. It would cause unacceptable harm to their role as internationally significant office locations and cause irreparable damage to the contribution of these areas to the London economy and employment and the prosperity of the whole UK nation.
- 3.9.2 Small and Medium-Sized Enterprises (SMEs) play an important role in the CAZ business ecosystem. More than 99 per cent of business units in the Zone are in the SME size band 0 to 249 employees and in the NIOD the corresponding figure is 98 per cent⁵³. The new Class E to residential permitted development rights includes a size limit of 1,500 sq.m which at an office employment density ratio of 10 sq.m per worker would equate to 150 employees. From a qualitative perspective, Article 4 Directions in the CAZ and NIOD would be particularly beneficial to safeguard business space and enable SMEs to flourish.
- 3.9.3 The new permitted development rights could also result in significant harm to the West End and other shopping, leisure and tourism destinations across the CAZ through uncoordinated piecemeal conversions of commercial uses to residential and undermine their contribution to the economic and social recovery of London and the UK.
- 3.9.4 In the absence of Article 4 Directions, the new PDR could result in the loss of substantial amounts of commercial floorspace, including in places like the West End and Knightsbridge which contribute significantly to the vitality of central London. While it is recognised that these areas will continue the ongoing shift to more experiential and service-based commercial activities, the new PDR would have the opposite effect, threatening the life-blood of the West End and Knightsbridge and their attractiveness to Londoners and national and international visitors, and undermining their contribution to the economic and social recovery of London and the UK.
- 3.9.5 For central London, the new Class E to residential PDR comes at a time of high risk, given how central London's economy has been severely impacted by the COVID-19 pandemic⁵⁴. While there are emerging trends that could affect the nature of office working and the extent of remote working, as well as broader cyclical and structural shifts in demand for office space as a result of the pandemic, the extent of this and its impact on the need for office space in central London has yet to emerge fully. There are a wide variety of potential scenarios, including situations where office demand remains high,

⁵³ [GLA Economics. Working Paper 68: Work and life in the Central Activities Zone, the Northern Isle of Dogs and their fringes, GLA 2015](#)

⁵⁴ [The economic future of the Central Activities Zone \(CAZ\), Arup/Gerald Eve/LSE, 2021](#)

supported by a strong economic recovery and growth in emerging office-based sectors.

- 3.9.6 Central London has the highest residential property prices in the country⁵⁵. The strategic evidence indicates that average capital values for residential use in the CAZ exceed average values for offices and other commercial uses (see Section 7 of this report). While there may be some limited localised exceptions where the opposite is the case, there is a degree of volatility in office rental values over time, illustrated earlier in Figure 3.8. It is likely therefore, that at different points on the business cycle, residential values could exceed office values in all areas of the CAZ within the foreseeable future.

3.10 Conclusions

- 3.10.1 The CAZ is the vibrant heart and globally-iconic core of London and, together with the NIOD, makes a hugely significant contribution to the London economy and the UK economy. Its rich mix of world-class business, culture, night-time economy, tourism, shopping and heritage make it unique in both a London and national context. It requires different or tailored approaches to the application of national policy – including permitted development rights - to address its distinct circumstances.
- 3.10.2 It is vital that the strategic contributions made by the CAZ and NIOD to the economy, culture and identity of the capital are safeguarded. The success of the Zone is derived from a carefully balanced mix of commercial, cultural and residential uses. This requires the right planning context and careful land use management which is best undertaken collectively by the local planning authorities, the Mayor, Business Improvement Districts, landowners and other stakeholders.
- 3.10.3 London has a reputation as a global innovation hub. The emerging office sectors represented in the CAZ including tech, science, media, architecture, creative, communications and marketing were the fastest growing before the pandemic, and are well-placed to drive the recovery. The CAZ Economic Futures work, commissioned by the Mayor, concluded that in the long term, if the right action is taken, central London will be well placed to recover strongly.
- 3.10.4 The evidence presented here in this report supports the introduction of Article 4 Directions to remove Class E to residential permitted development

⁵⁵ In England and Wales, seven of the top ten local authorities with the highest median house prices are wholly or partly within the Central Activities Zone (CAZ). All boroughs that are wholly or partly within the CAZ are in the top 17 local authorities with the highest median house prices.

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/medianhousepricefornationalandsubnationalgeographiesquarterlyrollingyearhpssadataset09>

rights across the whole of the CAZ and NIOD (excluding the Royal Parks), being the smallest geographical area possible to avoid wholly unacceptable impacts in the terms of national policy. This is critical to enable the CAZ and NIOD to flourish and to contribute to the recovery and the continued prosperity of the nation as a whole.

4. Strategically significant office locations beyond the CAZ

4.1 Introduction

4.1.1 Beyond the CAZ and NIOD the London Plan recognises other strategically significant office locations in the capital including:

- Tech City and the Royal Borough of Kensington & Chelsea
- Town centre office locations
- Urban business parks in outer London.

4.1.2 These office locations complement the CAZ and NIOD and cumulatively are of strategic importance to London. Locally they provide an important source of employment and economic activity and contribute to the vibrancy and weekday spend of the town centres and high streets with which they are associated.

4.2 Tech City and the Royal Borough of Kensington & Chelsea

4.2.1 Tech City and the Royal Borough of Kensington & Chelsea – which both lie partly within, and partly beyond the CAZ – are recognised in the London Plan as nationally significant office locations⁵⁶ (see Figure 4.1). Government granted an exemption for these areas (along with the CAZ and NIOD) from office to residential PDR in 2013 and in May 2019 the relevant boroughs introduced Article 4 Directions when the exemptions expired.

Tech City

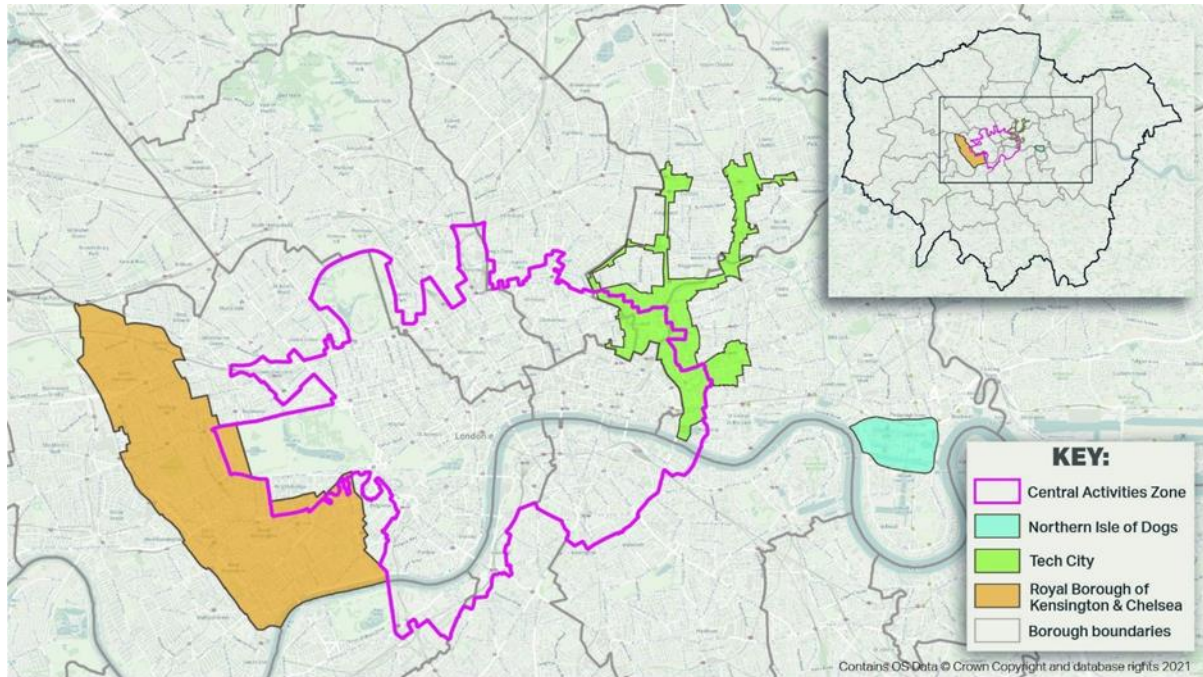
4.2.2 Tech City is recognised as a digital, creative and tech cluster and a business hub of major international significance. It is strategically important to the economy of London and the UK and contains an agglomeration of business functions and commercial development capacity in relatively central areas.

4.2.3 The area lies within the London boroughs of Hackney, Islington and Tower Hamlets and it comprises the core economic clusters within the wider City Fringe/Tech City Opportunity Area⁵⁷. Parts of the area lie within the CAZ and it includes development corridors extending from the Old Street ‘Silicon Roundabout’ and Shoreditch to Whitechapel, Hackney Central and Dalston. Within Tech City there is scope to support the expansion of diverse clusters of digital-creative businesses in the area as well as business and professional services.

⁵⁶ [Mayor of London. The London Plan 2021, March 2021](#) Policy E1 C

⁵⁷ [Mayor of London. City Fringe Opportunity Area Planning Framework, 2015](#)

Figure 4.1 London's nationally significant office locations⁵⁸



Source: GLA

4.2.4 The City Fringe, of which Tech City is part, is among London's most significant areas for economic growth, whilst also containing some of the capital's most deprived neighbourhoods. The unique function and importance of Tech City for London's economic growth has been recognised for many years, including by different Mayors. The current Prime Minister, Boris Johnson, whilst serving as the Mayor of London, stated in 2015:

“The growth of Tech City represents a massive opportunity for London to consolidate its position as the unchallenged tech capital of Europe, whilst fuelling a growth engine that can drive regeneration in East London.”⁵⁹

4.2.5 Since then, Tech City has continued to play an important economic role for the capital. The area contributed almost £15 billion to London's GVA output in 2019⁶⁰. The Tech City area is estimated to contain more than 190,000 workforce jobs in 2019, approximately 25 per cent of total employment in the three boroughs.⁶¹ In the City Fringe/Tech City Opportunity Area there is estimated capacity for an additional 50,000 jobs over the period 2016 to

⁵⁸ Illustration and boundaries are indicative

⁵⁹ [Mayor of London. City Fringe Opportunity Area Planning Framework, 2015](#) (Mayor's Foreword)

⁶⁰ Source: GLA Economics analysis of 2019 ONS output data

⁶¹ Source: GLA Economics analysis of 2019 BRES data

2041. Class E to residential PDR could temper the realisation of this potential growth in employment.

4.2.6 The area is increasingly the home of new and emerging sectors of the economy with particular clustering and accommodation requirements, including co-working, start-up and grow-on space, artist studio space and corporate office space. The Opportunity Area Planning Framework set out the key growth conditions that planning can affect in Tech City and the City Fringe including its:

- available, affordable, suitable business floorspace
- location and “creative vibe”
- dense, urban, collaborative environment
- connectivity
- mix of uses.

4.2.7 The availability of plentiful and relatively low-cost business space associated with the industrial legacy of the City Fringe has been one of the most significant factors in the rise of Tech City. Many of the old warehouses and printworks have now either been redeveloped or refurbished and competition for leases is increasing, as the core office market expands and more “traditional” City businesses look to locate in the area.

4.2.8 Furthermore, the increasing attractiveness of the City Fringe and the arrival of Crossrail mean that higher value residential can often outbid and displace lower value office and light industrial uses when new sites become available. Over time unfettered Class E to residential permitted development rights could contribute to the weakening and dissipation of the digital-creative cluster. This would be detrimental to London’s wider knowledge economy and the ambition to support a world leading digital creative business hub based around Tech City.

4.2.9 In conclusion, the introduction of Article 4 Directions for the Tech City area will continue to support the growth and expansion of this vital business and creative cluster and will help to ensure that sufficient commercial development capacity is provided to accommodate growth in employment and support the wider regeneration of the City Fringe Opportunity Area.

The Royal Borough of Kensington & Chelsea

4.2.10 Kensington & Chelsea (see Figure 4.1) contains a vibrant mix of business clusters which in 2019 contributed more than £10 billion to London’s economic output in 2019.⁶² In recognition of its strategic contribution to

⁶² Source: GLA Economics analysis of ONS output data

London's nationally significant office locations, government granted an exemption to office to residential PDR for the whole area in 2013.

- 4.2.11 In 2020 the borough is estimated to contain 457,000 sqm of office floorspace and 659,000 sq.m of retail and related food and beverage floorspace,⁶³ distributed in clusters across the area with particular concentrations in and around Knightsbridge, the King's Road and in other town centre locations. In Kensington & Chelsea - of which a small part lies within CAZ - employment is projected to grow by 18,000 over the period 2016-2041 or 12 per cent,⁶⁴ of which around 9,000 jobs are expected in offices.⁶⁵
- 4.2.12 Residential values in the Royal Borough of Kensington & Chelsea are among the highest in London. In the 15 months to March 2021, the average new build residential value in the borough was more than £2,100 per square foot, second only to the City of Westminster (which averaged £2,400 per square foot) and significantly higher than the London average (£863 per square foot).⁶⁶ This makes existing viable commercial space in the borough particularly vulnerable to commercial to residential PDR.
- 4.2.13 The introduction of Article 4 Directions in Kensington & Chelsea will continue to support its vibrant mix of business clusters and their contribution to the national and London economy.

4.3 Town centre office locations

- 4.3.1 The London Plan identifies strategically significant office locations which are found in town centres beyond the CAZ and NIOD (see Figure 4.2). The Plan recommends specific approaches to offices in these locations informed by the London Office Policy Review⁶⁷ and borough evidence.
- 4.3.2 Town centres categorised 'A' in the London Plan (see Figure 4.2) are those centres considered to have the capacity, demand and viability to accommodate new speculative office development. Centres in this category include **Stratford, Old Oak, Croydon, Hammersmith, Chiswick, Uxbridge** and **Wimbledon**.
- 4.3.3 **Ealing, Richmond, Shepherd's Bush, Hounslow, Brentford, Angel** and the **Elephant & Castle** are also recognised as being centres with capacity, demand and viability to accommodate new speculative office development

⁶³ Source: [VOA Non-domestic rating stock of properties 2020](#)

⁶⁴ Source: [GLA Economics, London long term labour market projections, 2017](#)

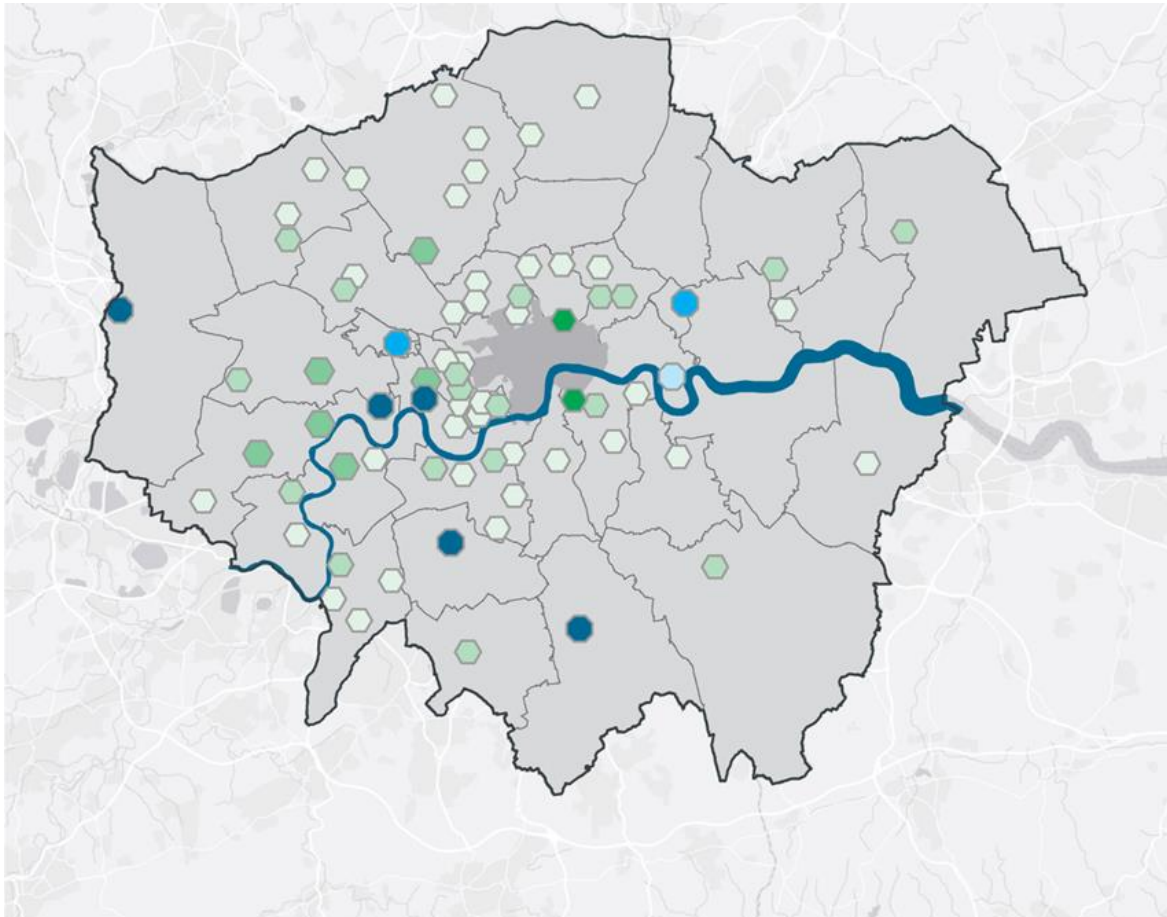
⁶⁵ Source: [Ramidus Consulting, London Office Policy Review, June 2017](#)

⁶⁶ Molior London. Residential Development Research. Quarterly Analysis, April 2021

⁶⁷ [Ramidus Consulting, London Office Policy Review, June 2017](#) op cit

and as part of mixed-use development (categorised as 'A/B' in the London Plan – see Figure 4.2).

Figure 4.2 Strategically significant town centre office locations in London



**Town Centre Network
Office Guidelines**

	A/ CAZ Satellite		B
	A/potential CAZ satellite		C
	A		CAZ
	A/B and part CAZ		
	A/B		

Source: GLA Planning

Contains OS data ©
Crown copyright and
database right (2017)

A: Centres with speculative office development potential

B: Centres with mixed-use office development potential

C: Centres with demand for existing office functions and need to protect small office capacity

- 4.3.4 **Stratford** and **Old Oak** are also recognised in the London Plan as a CAZ office ‘satellites’ with capacity to accommodate CAZ-related office functions. Stratford is an emerging office centre with an estimated inventory of around 250,000 sq.m of office floorspace.⁶⁸ It already shares the hyperconnectivity of the CAZ and this will be enhanced further when Crossrail is fully operational. Old Oak is set to be transformed by the late 2020s with the opening of Old Oak Common Station, which will connect the Elizabeth line and National Rail services to the newly built High Speed 2 line. A Local Plan has been published⁶⁹ which recognises the huge regeneration potential of the area and sets out a clear strategy for how redevelopment should help to optimise economic growth and regeneration potential, create a new town centre and bring tangible benefits for local communities and Londoners.
- 4.3.5 **Croydon** is identified in the London Plan as a strategic outer London office centre in recognition of the scale of its office function (estimated to be in the region of half a million square metres⁷⁰) and its excellent public transport connectivity. London Trams has transformed travel opportunities in the area and provides the potential for further growth in homes and jobs. The centre has been undergoing a transformation supported by improvements to the quality of the public realm and its attractiveness as an office location is reflected in year-on-year growth in average office rents in recent years from around £13 per square foot in 2013 to £27 per square foot in 2019.⁷¹ More recent evidence suggests that prime rents in Croydon reached £35 per square foot in 2020.⁷² Vacancy rates had also fallen significantly over this period from around 18 per cent in 2013 to less than 5 per cent in 2019.⁷³ The potential development pipeline of more than 130,000 sq.m is also a healthy indication of the centre’s prospects.⁷⁴
- 4.3.6 The London Plan also categorises strategic town centre office locations with the capacity, demand and viability to accommodate new office development, generally as part of mixed-use developments including residential use (Category ‘B’ in Figure 4.2) and town centres where it is particularly important to protect small office capacity (Category ‘C’ in Figure 4.2) where there is demand for existing office functions, generally within smaller units.⁷⁵

⁶⁸ Source: CoStar database (0.4 mile radius from Stratford rail/underground station)

⁶⁹ [OPDC Local Plan. Second Revised Draft for Regulation 19 \(2\) Consultation, 2018](#)

⁷⁰ Source: Estimate based on [VOA Non-domestic rating stock of properties 2020](#) and [Mayor of London. 2017 London Town Centre Health Check Analysis Report. January 2018](#)

⁷¹ Source: CoStar database

⁷² [Avison Young. South East Offices Q3 2020](#)

⁷³ Source: CoStar database

⁷⁴ [Knight Frank. The next chapter 2021-the M25 and south east office market report, 2021](#)

⁷⁵ See Annex 1, Table A1.1 of [The London Plan 2021](#) for a list of these centres

- 4.3.7 Understandably, as with the CAZ and NIOD, the coronavirus pandemic and associated lockdowns have affected the outer London office market but it remains too soon to appreciate the impacts fully. Recent evidence from agents illustrates the continued strengths of strategic office locations beyond the CAZ and NIOD, notwithstanding the impacts of the pandemic, with prime rents in several centres exceeding £24 per square foot in the third quarter of 2020 and several locations exceeding £40 per square foot (see Table 4.3). Agents are reporting a pick-up in enquiries with demand in the market returning quicker than may have been anticipated at the height of the first lockdown.⁷⁶ Agents also report that that investor confidence in the longer-term prospects for the market remained robust.⁷⁷

Figure 4.3 Prime office rents in selected strategic office centres outside the CAZ and NIOD, Q3 2020

Office location	Prime office rent £ per square foot	Office location	Prime office rent £ per square foot
Hammersmith	58	Uxbridge	35
Wimbledon	54	Croydon	35
Chiswick	54	Brentford	28
Richmond	52.50	Bromley	24
Ealing	45		

Source: Avison Young

- 4.3.8 London is a global innovation hub and strategic office centres beyond the CAZ and NIOD may also emerge strongly, if afforded the opportunity to do so. Taking into account factors important for innovation including the infrastructure, quality of life and the strength of the grassroots, entrepreneurial community, Knight Frank have identified Richmond, Uxbridge, Kingston and Twickenham as among the top-15 innovation-led locations in the M25 and South East property market area, with Bromley and Brentford highlighted as ‘up and coming centres’.⁷⁸
- 4.3.9 It is anticipated that further evidence associated with the strategically important town centre office locations in London will be available in due course through the 2021 London Town Centre Health Check.

⁷⁶ [Savills. Market in Minutes: Greater London & South East Offices, November 2020](#)

⁷⁷ [Avison Young. South East Offices Q3 2020](#)

⁷⁸ [Knight Frank. The next chapter 2021-the M25 and south east office market report, 2021](#)

4.4 Urban business parks in outer London

- 4.4.1 London also contains several strategic office clusters located in urban business parks outside of town centres such as Chiswick Park, Stockley Park and Bedfont Lakes for example. Chiswick Park prime office rents have been reported recently at well in excess of £50 per square foot and business parks in the vicinity of Heathrow were averaging £35 per square foot.⁷⁹
- 4.4.2 The London Plan recognises the role that these locations play in contributing to the economy and employment in outer London whilst ensuring that steps are taken towards greater transport sustainability of these locations. As with town centre strategic office locations, the contribution of these outer London business parks to London's economy and employment could be significantly reduced by Class E to residential permitted development rights.

4.5 Conclusions

- 4.5.1 London contains several strategic office locations which complement the CAZ and NIOD. Some of these locations have been identified as nationally significant, including Tech City and the Royal Borough of Kensington & Chelsea, and others are strategically important to the London economy and its contribution to the UK economy. Locally they provide an important source of employment and economic activity and contribute to the vibrancy and weekday spend of the town centres and high streets with which they are associated.
- 4.5.2 New Class E to residential permitted development rights could threaten the vibrancy and economic contribution of these locations to the London and UK economy and to the local economies in which they are situated and lead to significant missed opportunities for growth. The Mayor supports Article 4 Directions to remove Class E to residential permitted development rights to safeguard the strategic office functions associated with these locations. These should be targeted accordingly drawing on more detailed local evidence. Where relevant, Article 4 Directions for these areas should also have regard to the wider potential impacts of Class E to residential PDR on the vibrancy of town centres of which they are part (see Section 5 of this report).

⁷⁹ [Avison Young. South East Offices Q3 2020](#)

5. Town centres and high streets

5.1 Introduction

- 5.1.1 Town centres and high streets are at the heart of local communities, providing access to a range of shops and services, employment opportunities, culture and social contact, and information and support. Some town centres have specialist functions and play international, national and regional roles, whilst others perform local roles, meeting the day to day needs of Londoners. Over the years, town centres have absorbed change and new technologies. To continue to thrive they will need to evolve and diversify their commercial, cultural and community functions in response to current and future economic trends, technological advances, consumer behaviours, and the development of the 24-hour city.
- 5.1.2 The COVID-19 pandemic has had a significant economic and social impact on London's town centres and high streets. The GLA and London Councils have recognised this, making high streets the focal point for recovery planning. Article 4 Directions to remove the new Class E to residential PDR would aid recovery efforts and help maintain London's vibrant town centres and high streets.
- 5.1.3 This section of the report sets out the strategic importance of town centres and high streets in London and contextual evidence to support the introduction of Article 4 Directions to remove Class E to residential PDR in appropriate circumstances.

5.2 Strategic importance of town centres and high streets in London

- 5.2.1 The London Plan promotes **town centres**⁸⁰ as strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners, including main town centre uses, night-time economy, civic, community and social infrastructure and appropriately planned residential uses. It seeks to strengthen their role as an important focus for Londoners' sense of place and local identity in the capital and it promotes their adaptation and diversification supported by ambitious and innovative strategies at the local level.
- 5.2.2 The Plan also recognises the importance of London's **high streets** as one of London's most characteristic urban features which play an important role in terms of local economic and social infrastructure, providing employment

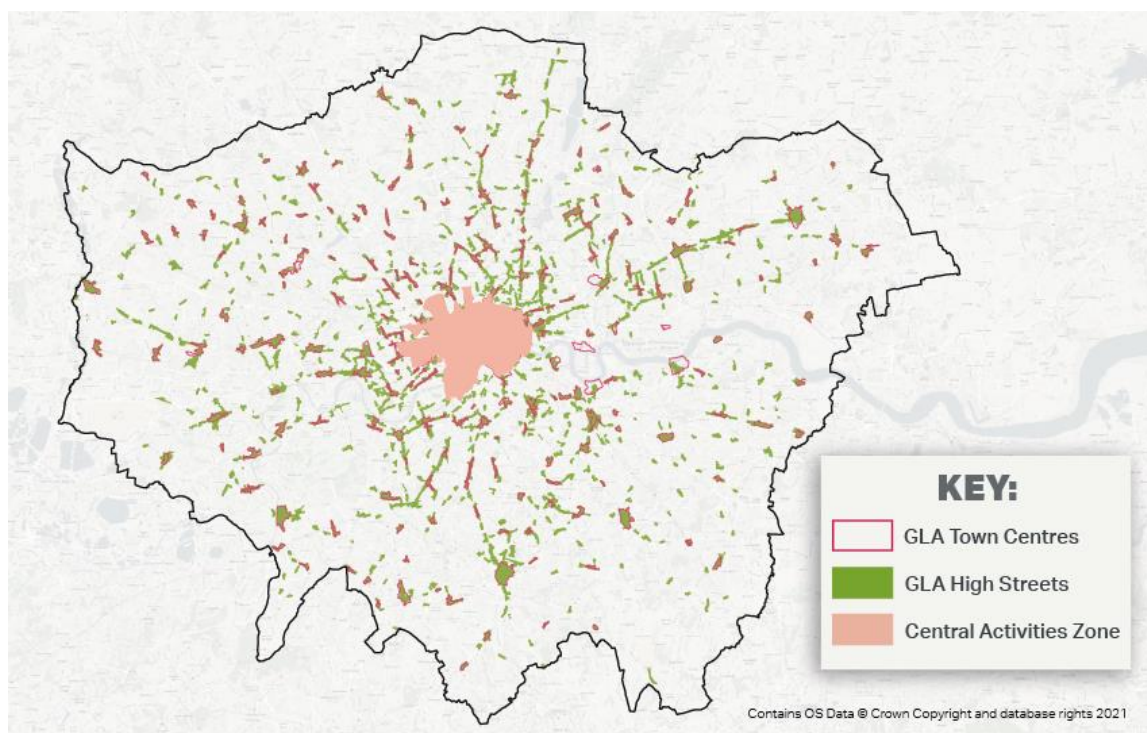
⁸⁰ See [The London Plan 2021, March 2021](#) Policies SD6-SD9

opportunities and promoting community and cultural exchange. In London, high streets are defined as:

“...complex and dynamic mixed-use urban corridors [which] ensure easy pedestrian access to everyday goods and services, places of work and leisure. They are typically characterised by a variety of premises that accommodate non-residential uses to support the wider neighbourhood.”⁸¹

- 5.2.3 High Streets play an important role in civic and community life and are vital for London’s economic success. They are linked to and sometimes synonymous with town centres. The GLA has identified more than 600 high streets in London (see Figure 5.1). Many high streets extend beyond the town centres identified in the London Plan and several are closely linked to Neighbourhood and Local centres defined in borough Local Plans.

Figure 5.1 London’s town centres and high streets



- 5.2.4 It is estimated that 90 per cent of London’s population live within a ten-minute walk of a town centre or high street.⁸² Almost half of all businesses outside central London are on a high street and 1.45 million employees work on or within 200 metres of a high street.⁸³ Research shows how much

⁸¹ [Mayor of London. High Streets and Town Centres Adaptive Strategies, January 2019](#)

⁸² [We Made That, LSE Cities. High Streets for All, September 2017](#) and [High streets and town centres in the context of COVID-19](#)

⁸³ [We Made That, LSE Cities. High Streets for All, September 2017](#)

Londoners value them as places to meet, socialise, access services, shop, work and live.⁸⁴ These vital public places boost wellbeing and benefit many different communities, making them some of London's most important spaces.

5.3 Strategic evidence – supply, demand and vacancy trends

Supply-side trends

- 5.3.1 A diverse range of commercial, business and service uses is fundamental to town centre and high street vitality. In contrast to wider concerns about the decline of high streets nationally, the total number of retail and leisure outlets in London's town centres and high streets increased by 0.1 per cent and 0.5 per cent respectively over the period 2015 to 2019⁸⁵ (see Figure 5.2).
- 5.3.2 The overall growth in town centre and high street outlets was driven mainly by growth in service retail, leisure and convenience outlets. By contrast, comparison goods retail shops are showing signs of gradual decline in town centres and high streets by around 1 per cent per annum between 2015 and 2019. It is likely that the growth in e-commerce has been a key factor behind these trends. The decline is not universal across all categories of comparison goods however, and some categories of shop which have previously faced decline in numbers such as books and music shops have stabilised over the same period.⁸⁶

Figure 5.2 Annual growth rate of shops 2015-19 by category of shop

	Convenience retail	Comparison retail	Service retail	All retail	Leisure	All retail & leisure outlets
London	1.1%	-0.2%	2.2%	0.9%	1.7%	1.1%
Town centres	0.3%	-1.2%	1.0%	-0.2%	0.9%	0.1%
High Streets	0.4%	-1.0%	1.5%	0.3%	1.2%	0.5%

Source: GLA Economics analysis of Local Data Company data

- 5.3.3 Leisure activities are increasingly being favoured by households and leisure outlets have been growing at a faster rate in the capital than retail shops, at 1.7 per cent a year between 2015 and 2019. Leisure outlets⁸⁷ are growing

⁸⁴ [We Made That, LSE Cities. High Streets for All, September 2017](#)

⁸⁵ [GLA Economics. The retail sector in London and impact of coronavirus trends, March 2021](#)

⁸⁶ GLA Economics, March 2021 op cit

⁸⁷ Leisure outlets include uses such as cafes, restaurants, pubs, hot food takeaways, leisure attractions and hotels.

faster than retail shops in both town centre and high street areas – a sign of the adaptation, diversification and resilience of these locations in London.

- 5.3.4 Offices and light industrial uses in Class E also contribute to the range of uses in town centres and high streets alongside retail and leisure uses. Offices can make up a significant proportion of total commercial floorspace in town centres some of which are identified as strategically significant office locations in the London Plan (see Section 4 of this report). Other town centres and high streets in London support local office-related functions, making an important contribution to the vitality and viability of these centres, providing a source of local employment and contributing to footfall and spend during the day and into the evening. As noted in previously in this report, while there are emerging trends that could affect the nature of office working and the extent of remote working, the extent of this and its impact on the need for office space has yet to emerge fully.

Demand-side trends

- 5.3.5 On the demand side, significant growth in London's population coupled with high levels of employment have driven strong growth in overall consumer expenditure by Londoners.⁸⁸ Retail goods output is growing at a faster rate in London (by 3.7 per cent a year between 2010 and 2018) than it is nationally (2.2 per cent per annum). Around a third (34 per cent) of consumer expenditure by Londoners is on commodities which correspond broadly to the retail sector and almost a quarter (23 per cent) is on leisure activities.⁸⁹ London is also witnessing an increased share of consumer expenditure on leisure activities (several of which fall within Use Class E), alongside increased retail spending. Mirroring the supply-side trends this is an important factor in explaining the resilience of London's town centres and high streets and their adaptation and diversification towards experiential and leisure uses. Trips to essential shops and amenities are the most common reason to visit the high street and the majority of shopping and personal business trips have a journey time of under 15 minutes.⁹⁰
- 5.3.6 Prior to the pandemic approximately 20 per cent of spend on comparison goods retail in London was from international tourists, domestic tourists and day-time commuters from outside London and all of these sources of spend are projected to grow strongly (around 4 per cent per annum for international

⁸⁸ [Experian Business Strategies. Consumer Expenditure and Comparison Goods Floorspace Need in London, October 2017](#)

⁸⁹ Source: [GLA Economics analysis](#) of ONS Family Spending

⁹⁰ GLA Economics, March 2021 op cit, Figure 4.8, based on TfL analysis of the London Travel Demand Survey

tourist spend, 3 per cent per annum for domestic tourist spend and 2 per cent per annum for commuter spend).⁹¹

- 5.3.7 Whilst the pandemic has had an immediate impact on spend from these sources in London's town centres and high streets in 2020 and in 2021, they are anticipated to recover from the lows of 2020 as lockdown measures ease. To attract domestic visitors to London the Mayor launched a new 'Let's Do London' campaign⁹² which brings together the capital's world-leading hospitality, culture, nightlife and retail venues to promote all London has to offer. As noted in Section 3, for overseas tourism, the underlying fundamentals of London's attractiveness remain strong and, as coronavirus restrictions on international travel ease, we can expect this source of spend to recover over time.
- 5.3.8 E-commerce is broadly based and expanding and it remains both a challenge and an opportunity for London's town centres and high streets. The growth in households in Britain with internet access has risen steadily over the last 20 years and growth is now easing off as over 90 per cent of households have access.⁹³ Prior to the onset of the coronavirus pandemic the proportion of retail goods sales via the internet had been rising steadily and was averaging over 19 per cent of sales in 2019.⁹⁴
- 5.3.9 During the pandemic, retail sales via the internet as a proportion of all retail sales reached highs of 36 per cent in November 2020 (attributed in part to the coronavirus restrictions at the time and in part to the annual 'pre-Christmas' spike in internet sales) and it reached a similar figure in January 2021 (following full lockdown measures introduced from December) before falling back to 29 per cent in April as lockdown measures eased. The rising overall trend in the proportion of sales via the internet remains an ongoing risk to high streets and town centres but many retailers have either established or strengthened their internet presence to complement their physical stores and drive overall sales. This is helping to support the ongoing viability of high street outlets.

Vacancy rate trends

- 5.3.10 Vacancy rates in London's town centres and high streets are typically well below those experienced in other parts of the country. To provide some perspective, in 2019 the London shop vacancy rate was 9.0 per cent, which is more than three percentage points lower than the rate for Britain (12.1 per

⁹¹ Long-term projections 2015-2041, source: [Experian Business Strategies. Consumer Expenditure and Comparison Goods Floorspace Need in London, October 2017](#)

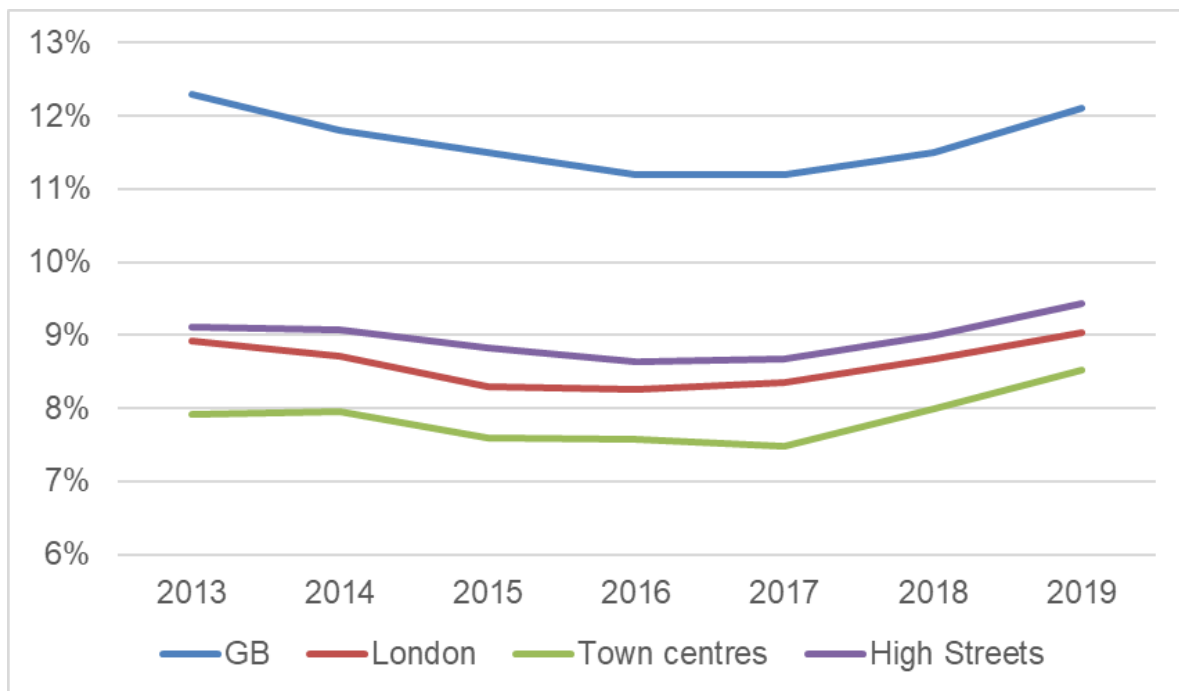
⁹² [Mayor of London announces plans for biggest domestic tourism campaign](#)

⁹³ Source: [GLA Economics analysis](#) of ONS internet access – households and individuals

⁹⁴ Source: ONS. Retail sales index internet sales (Released 21 May 2021)

cent)⁹⁵ (see Figure 5.3). The average vacancy rates for town centres and high streets were 8.5 per cent and 9.4 per cent respectively which translates to 3.6 and 2.7 percentage points lower (respectively) than the average vacancy rate for Britain.

Figure 5.3 Shop vacancy rates in London's Town Centres and High Streets compared to the London and Great Britain average 2013-2019



Source: GLA Economics analysis of Local Data Company data

- 5.3.11 Recent data from the Local Data Company⁹⁶ suggests that average shop vacancy rates in London increased from 9 per cent in the first half of 2020 to 10 per cent in the second half of 2020 - largely attributed to the pandemic and associated lockdowns - but these vacancy rates for London remain well below the national average (which was over 13 per cent in the second half of 2020) and lower than in any other region of the UK.
- 5.3.12 The 2017 London Town Centre Health Check⁹⁷ provides vacancy data for individual town centres in London and it is anticipated that further data will be available in due course as part of the GLA's next London Town Centre Health Check.

⁹⁵ [GLA Economics. The retail sector in London and impact of coronavirus trends, March 2021](#)

⁹⁶ Source: Local Data Company. 23rd Retail and Leisure Trends Summit, 24 March 2021

⁹⁷ [London Datastore: London Town Centre Health Check 2017 - Technical Annex](#)

5.4 Recovery from the impacts of the pandemic

- 5.4.1 Economic restructuring brought about by shifts in consumer behaviour and related property investment models have been accelerated by the COVID-19 pandemic. In response, leaders from across London's government, business and civil society, as well as the health and education sectors, trade unions and the police, have come together to oversee the long-term recovery effort to help shape an inclusive approach to the recovery and renewal of town centres and high streets in the capital.⁹⁸
- 5.4.2 Town centres and high streets are at the heart of one of the nine 'missions' that comprise the London Recovery Programme, designed to address the economic, social and health impacts of the pandemic, to restore confidence in the city, minimise the impact on the most vulnerable communities and rebuild the city's economy and society.⁹⁹
- 5.4.3 The High Streets for All mission sets out a clear intent to work with London's diverse communities to establish new, innovative and experimental uses across London's high streets and public spaces (see Figure 5.4). The programme seeks to create thriving, inclusive and resilient high streets and town centres, within easy reach of all Londoners. It aims to bring vacant and underused buildings into productive use, promoting local employment and near home working.
- 5.4.4 The GLA is also piloting a new data service¹⁰⁰ with the aim to provide organisations ongoing access to good quality high street and town centre data at low cost. The objective is to enable partner organisations to develop data-driven solutions to support thriving town centres and high streets and inform locally-based strategies produced in partnership with local communities.
- 5.4.5 The data includes insights related to footfall and spend in high street locations. Analysis of the London-level data shows how retail and eating out transactions (see Figures 5.5 and 5.6 respectively) in London's town centres and high streets were impacted heavily by the coronavirus pandemic as places to eat out and non-essential shops closed and Londoners followed the 'stay at home' guidelines during lockdown periods. In March 2020 retail transactions in London's town centres and high streets were impacted less than eating out transactions as essential retailers such as food shopping and pharmacies remained open.

⁹⁸ <https://www.london.gov.uk/coronavirus/londons-recovery-coronavirus-crisis/london-recovery-board>

⁹⁹ <https://www.london.gov.uk/coronavirus/londons-recovery-coronavirus-crisis/recovery-context>

¹⁰⁰ <https://data.london.gov.uk/high-street-data-service/>

Figure 5.4 London Recovery Programme – High Streets for All mission

HIGH STREETS FOR ALL

Mission Leads, Organisations and Approach



Mission

Deliver enhanced public spaces and exciting new uses for underused high street buildings in every Borough by 2025, working with London's diverse communities.

Mission Co-leads: London Borough of Enfield / GLA

Lead by locally defined partnerships - involving property interests, businesses, diverse community groups and local anchor institutions, supported by London Boroughs, London Councils and the GLA group and a newly formed multi sector / diverse interest advocates group.

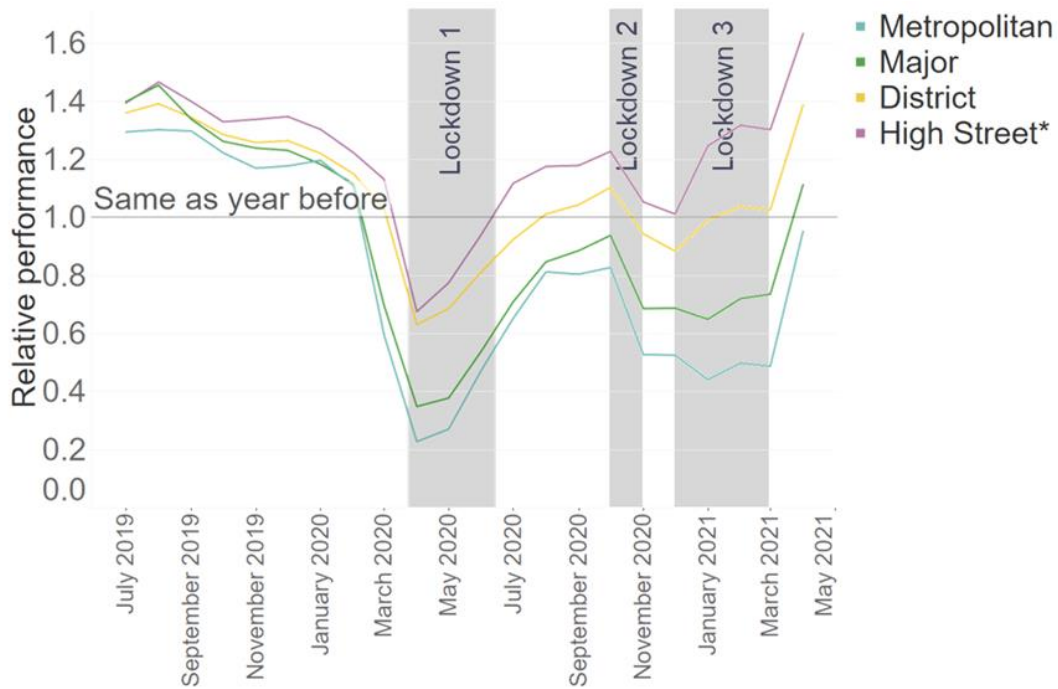
Approach

We propose to achieve the mission by fostering local engagement, partnership formation and a culture of ideas, experimentation and invention across the city to deliver inclusive, exemplar High Street projects in every borough.

This will be supported by enabling funds, expert advice and best practice sharing. We will develop tools that respond to recent planning and licensing changes and plan for, safeguard and directly deliver a diverse, resilient and thriving mix of High street and town centre activity within easy reach of all Londoners and at all times of day and night.

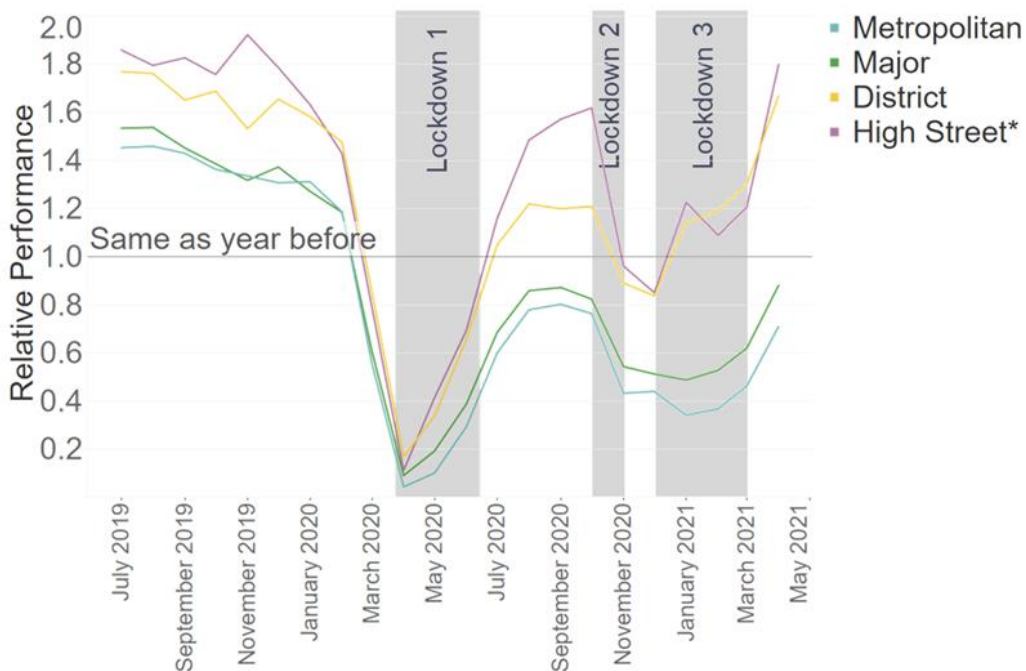
Source: London Recovery Programme

Figure 5.5 Monthly count of retail transactions in London's town centres and high streets compared to the same month in the previous year (2019-2021)



Source: GLA analysis of Mastercard data. Chart shows transaction count as a proportion of the previous year. * High streets located outside of town centres

Figure 5.6 Monthly count of eating out transactions in London's town centres and high streets compared to the same month in the previous year (2019-2021)



Source: GLA analysis of Mastercard data. Chart shows transaction count as a proportion of the previous year. * High streets located outside of town centres.

- 5.4.6 Figures 5.5 and 5.6 illustrate that Metropolitan and Major town centres were impacted to a greater degree on average, in part due to their greater reliance on worker and visitor spend and because they typically capture London resident spend from wide catchment areas.¹⁰¹
- 5.4.7 By contrast the smaller District town centres and local high streets beyond town centres witnessed a lower reduction in year-on-year retail transactions during each period of lockdown and recovered more strongly as each subsequent period of lockdown was eased. This reflects how people began to connect even more with their local town centres and high streets during the pandemic.¹⁰²
- 5.4.8 Figures 5.5 and 5.6 also illustrate that as each period of lockdown was lifted or eased, Londoners began to return in increasing numbers to the larger town centres as well as the smaller centres and high streets. This is a very positive and encouraging sign. It suggests that town centres and high streets in London, with the right support and with concerted national, London-level and local action, are well placed to recover from the impacts of the pandemic. Targeted Article 4 Directions can help to ensure that these actions are not undermined by Class E to residential permitted development.

5.5 Potential impacts of permitted development rights

- 5.5.1 There is strong cross-party support for actions to mitigate the impacts of Class E to residential PDR on the economy and ecosystem of high streets in London. The London Assembly Regeneration Committee¹⁰³ highlighted its concerns related to the impact of PDR in January 2021 and more recently the London Assembly Economy Committee¹⁰⁴ presented views on the actions that should be taken to help London's high streets in the city's recovery from COVID-19. These actions included ensuring that the potential challenges of any changes to the PDR regulations are being properly considered and to ensure that commercial districts including town centres and high streets are not threatened by inappropriate residential development.

¹⁰¹ [Experian Business Strategies. Consumer Expenditure and Comparison Goods Floorspace Need in London, October 2017](#)

¹⁰² London Boroughs can draw on further details of trends in footfall and spend for individual town centres and high streets which has been made accessible through the [GLA High Street Data Service](#)

¹⁰³ [London Assembly Planning Committee response to MHCLG consultation PDR Class E to residential, January 2021](#)

¹⁰⁴ [London Assembly Economy Committee, High Hopes. Supporting London's high streets in the economic recovery from COVID-19, March 2021](#)

-
- 5.5.2 The evidence set out in Section 7 of this report shows that average capital values in residential use exceed average capital values in the range of commercial uses in Class E in almost all parts of London. Active commercial uses and the jobs they support will be at risk of being turned into higher value housing use. The new PDR, in the absence of targeted Article 4 Directions, could impact the adaptation of London's town centres and high streets to be (and remain) vibrant, successful locations for a range of business, culture, civic and community activities complemented by well-planned housing and mixed-use development.
- 5.5.3 The introduction of piecemeal residential development on the ground floor in thriving areas could lead to sterile and incoherent high street frontages, impacting on their sense of place, natural surveillance and weakening their function, resilience and attractiveness as places to visit, work and interact. The piecemeal loss of commercial will reduce overall footfall, depriving other businesses and potentially driving the loss of a far more significant number of premises than those who chose to convert commercial to residential.
- 5.5.4 While town centres and high streets can benefit from additional homes in the area, this should be well planned and should not come forward at the expense of successful commercial and community uses. Residential uses have different characteristics to commercial, business and service uses. Once conversions to residential occur the inherent flexibility of high street premises in commercial and community uses is lost, undermining the ability of the high street to adapt to future circumstances.
- 5.5.5 Thriving neighbourhood and local centres are as much at risk as larger town centres and loss of essential services will have a disproportionate equalities impact on Londoners who rely on local access to services in walkable distance from where they live. Too much erosion of commercial and community services via PDR in town centres and high streets could also create dormitory areas where residents must travel further afield to get to shops and places of work, undermining efforts to support walking and cycling and the creation of a more sustainable city.
- 5.5.6 There is a strong case for targeted Article 4 Directions to remove Class E to residential PDR and ensure that the social and economic functions of London's high streets and town centres are sustained and to support London's economic and social recovery.

5.6 Conclusions

- 5.6.1 The new Class E to residential PDR, in the absence of targeted Article 4 Directions, could impact London's vibrant town centres and high streets and risk undermining the recovery efforts.
- 5.6.2 London's high streets and town centres have shaped the fabric of the capital. They are a focal point for London's culture, communities and everyday

economies. Their distinctive ethnic offer meets the needs of London's diverse communities whilst also attracting visitors from far beyond the capital. Town centres and high streets in London also support the most sustainable models of living and working, including active travel and shorter commutes.

- 5.6.3 Despite changes in consumer behaviour, technology and competition from out-of-centre development, they have shown their resilience by adapting and re-inventing themselves. They have diversified over time towards leisure uses and experiential, service retail uses. Vacancy rates in London's town centres and high streets are typically around 3 per cent lower than in other parts of the country and the evidence shows that footfall is increasing strongly as pandemic restrictions are eased. To support London's economic and social recovery from the impacts of the pandemic, it is essential that there is space available for businesses to innovate, to start up and to create new jobs and this is central to the High Streets for All mission, part of the wider London Recovery Programme.
- 5.6.4 The underlying fundamentals of London's growing population, the Mayor's commitment to protecting and creating jobs and London's attractiveness to domestic tourism and (when inbound overseas travel restrictions are lifted) to international tourism, remain strong.
- 5.6.5 Given the right spatial planning environment, town centres and high streets in London will be able to adapt to the challenges and opportunities they face, just as they have done in the past.
- 5.6.6 The strategic evidence presented here supports targeted Article 4 Directions to remove Class E to residential PDR in London's high streets and town centres. How this should best be achieved will vary from place to place. Local planning authorities and the businesses and communities in their areas have specific knowledge and intelligence related to their town centres and high streets. They are therefore well placed to identify which will be impacted most adversely by the new permitted development rights and where targeted Article 4 Directions will be appropriate.

6. Industrial areas and creative production space

6.1 Introduction

- 6.1.1 London depends on a wide range of industrial, logistics and related uses that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as contributing towards employment opportunities for Londoners. This includes a diverse range of activities such as food and drink preparation, creative industry production, maintenance and repair, storage and distribution, waste management, utilities, transport functions and a range of emerging activities such as data centres, renewable energy generation and clean technology.
- 6.1.2 Over the period 2001 to 2015, more than 1,300 hectares of industrial land was released to other uses¹⁰⁵ and this far exceeded previously established London Plan monitoring benchmarks. Research for the GLA indicates that there will be positive net demand for industrial land in London over the period 2016 to 2041,¹⁰⁶ mostly driven by strong demand for logistics to service growth in London's economy and population.
- 6.1.3 The 2021 London Plan contains policy to ensure that a sufficient supply of land and premises is provided and maintained in different parts of London to meet current and future demands for industrial and related functions.¹⁰⁷ To achieve this objective and to support planning for industrial capacity at the local level the London Plan identifies three categories of industrial land (illustrated in Figure 6.1).
- 6.1.4 The Plan seeks to ensure that provision is made for the varied operational requirements of different types of industrial uses. It also promotes innovative concepts including the intensification of industrial activities and, in appropriate circumstances, the colocation of industrial uses with other non-industrial uses and the substitution of industrial capacity to achieve greater efficiency in the use of land.¹⁰⁸
- 6.1.5 The intensification of industrial land in SIL and LSIS can also be used to facilitate the consolidation of a SIL or LSIS through a Local Plan or masterplan process to support the delivery of housing and other uses, such as social infrastructure, or to contribute to town centre renewal. For LSIS,

¹⁰⁵ [AECOM, We Made That. Industrial Land Supply and Economy Study, March 2016](#)

¹⁰⁶ [CAG Consultants. London Industrial Land Demand Study, October 2017](#)

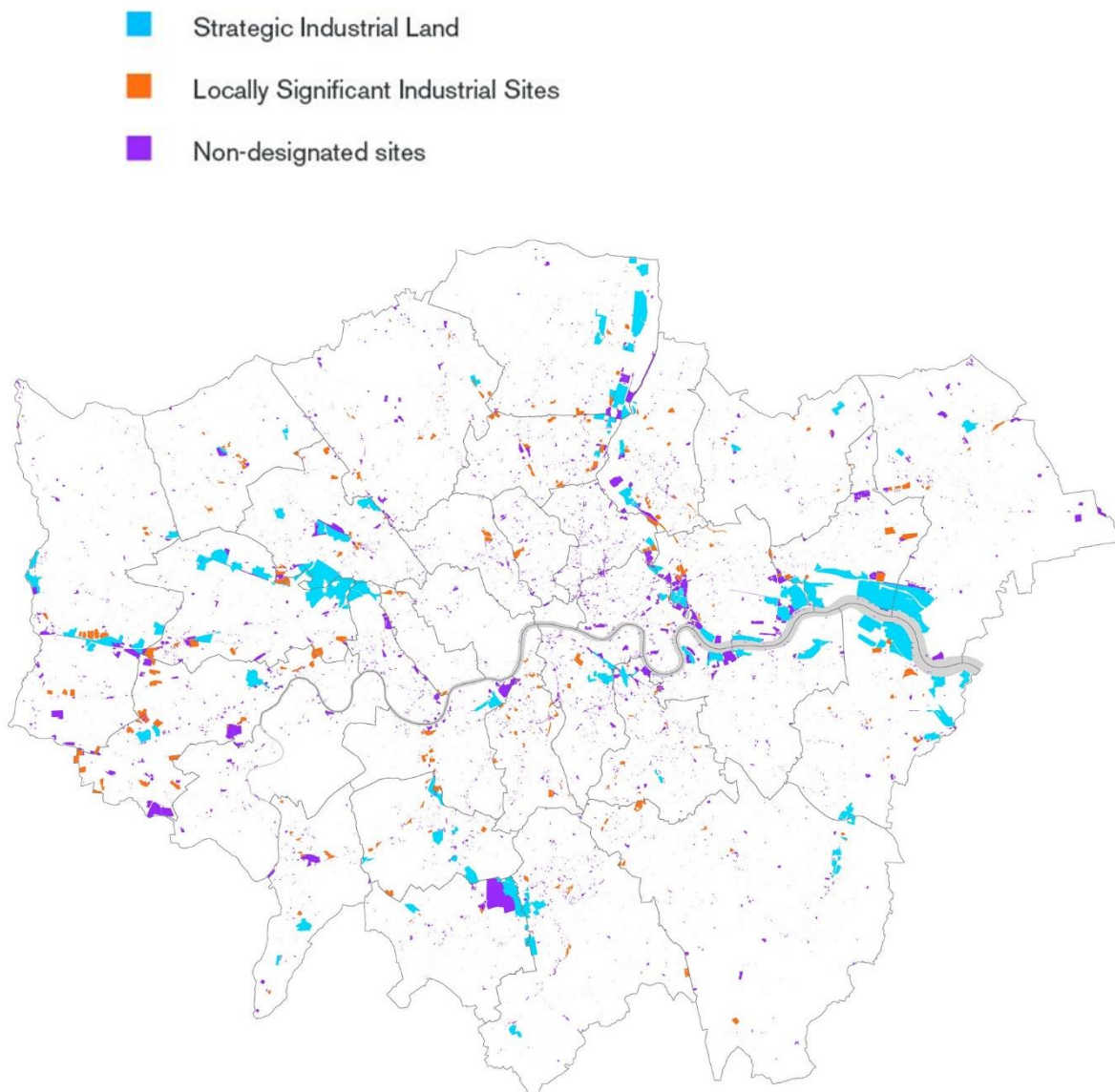
¹⁰⁷ [The London Plan 2021](#) : Policy E4

¹⁰⁸ [The London Plan 2021](#) : Policy E7; and see [We Made That, Savills, Feasibility. Industrial Intensification and Co-location Study. October 2018](#)

boroughs can bring forward policies in their Local Plans setting out the range of industrial uses to be provided for.

- 6.1.6 The Plan urges boroughs to ensure that the need to retain sufficient industrial capacity is not undermined by permitted development rights by introducing Article 4 Directions where appropriate. This section of the report provides strategic context and evidence to support boroughs considering Class E to residential Article 4 Directions for this purpose.

Figure 6.1 London's industrial capacity by category



Source: AECOM, We Made That. London Industrial Land Supply and Economy Study, 2016

6.2 Strategic Industrial Locations and Locally Significant Industrial Sites

- 6.2.1 The London Plan sets out strategic policy for Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS).¹⁰⁹ Local authorities are responsible for defining the detailed boundaries of these areas. In 2015 there was an estimated 3,900 hectares of land in SIL and 1,200 hectares of land in LSIS (just 2.4 per cent and 1.3 per cent of the area of Greater London respectively).¹¹⁰ Together these areas accommodated almost two-thirds of London's industrial land in 2015.¹¹¹
- 6.2.2 London's industrial capacity can be impacted by Class E to residential PDR in two principal ways:
- directly - through the loss of light industrial and creative production uses that fall within Class E; and
 - indirectly - through the introduction of residential uses in areas that contain a range of industrial uses (including uses outside of Class E) which can compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis.
- 6.2.3 SIL and LSIS are particularly suitable for accommodating a range of industrial and related uses which, by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements, can raise tensions with other land uses, particularly residential development. This is recognised by government in the legislation¹¹² related to Class E to residential permitted development which includes a clause (MA.2.(2)(g)) that allows consideration of the impact on intended occupiers of the development of the introduction of residential use in an area that a local authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses.

¹⁰⁹ Policies E5 and E6 respectively

¹¹⁰ Source: GLA

¹¹¹ [AECOM, We Made That. Industrial Land Supply and Economy Study, March 2016](#)

¹¹² [Statutory Instrument 2021 No.428. The Town and Country Planning \(General Permitted Development etc.\) \(England\) \(Amendment\) Order 2021](#) Clause MA.2.(2)(g)

-
- 6.2.4 When interpreting the generic phrase in the legislation: “*general or heavy industry, waste management, storage and distribution*” in a London context, it is considered that these uses include:
- a) general industrial (Use Class B2)
 - b) storage and logistics/distribution (Use Class B8) including ‘last mile’ distribution close to the CAZ and the Northern Isle of Dogs, and consolidation centres
 - c) secondary materials, waste management and aggregates
 - d) utilities infrastructure (such as energy, water supply and wastewater)
 - e) land for transport functions (including intermodal freight interchanges, rail and bus infrastructure), and
 - f) wholesale markets.
- 6.2.5 Figure 6.2 illustrates the proportion of land in the heavier industrial uses discussed in paragraph 6.2.4¹¹³ on SIL, LSIS and Non-Designated Industrial Sites, in London’s five industrial property market areas (PMA - see Figure 6.3). It shows that for SIL, the average proportion of land in heavy industrial uses varies from 78 per cent in the Wandle Valley PMA to 89 per cent in the Lea Valley PMA. For LSIS, the proportions are lower, varying from 56 per cent in the Wandle Valley PMA to 82 per cent in the Lea Valley PMA.
- 6.2.6 This evidence, reflecting the London Plan policy approach, indicates that SIL and LSIS should be considered as *areas that are important for heavy industry, waste management, storage and distribution, or a mix of such uses* (in the terms used in clause MA.2.(2)(g) in the legislation).
- 6.2.7 With regard to light industrial uses, given the blurring in practice between these uses and those which are general industrial, storage or distribution activities, the estimated proportions of SIL and LSIS in light industrial use in Figure 6.2 are likely to be an under-estimate.
- 6.2.8 It should also be noted that the analysis in Figure 6.2 is based upon the average for the whole PMA and there will be a greater variation in the proportion of heavy industry, waste management, storage and distribution uses at the level of individual SIL and LSIS. There may be circumstances where it may be more problematic for local authorities to draw on clause MA.2.(2)(g) in the legislation, such as where a sub-area of a SIL or LSIS has a mix of industrial uses at the lighter end of the spectrum, or where parts of a SIL or LSIS are being considered for consolidation as part of a plan-led or masterplan process. Article 4 Directions in these areas may be particularly

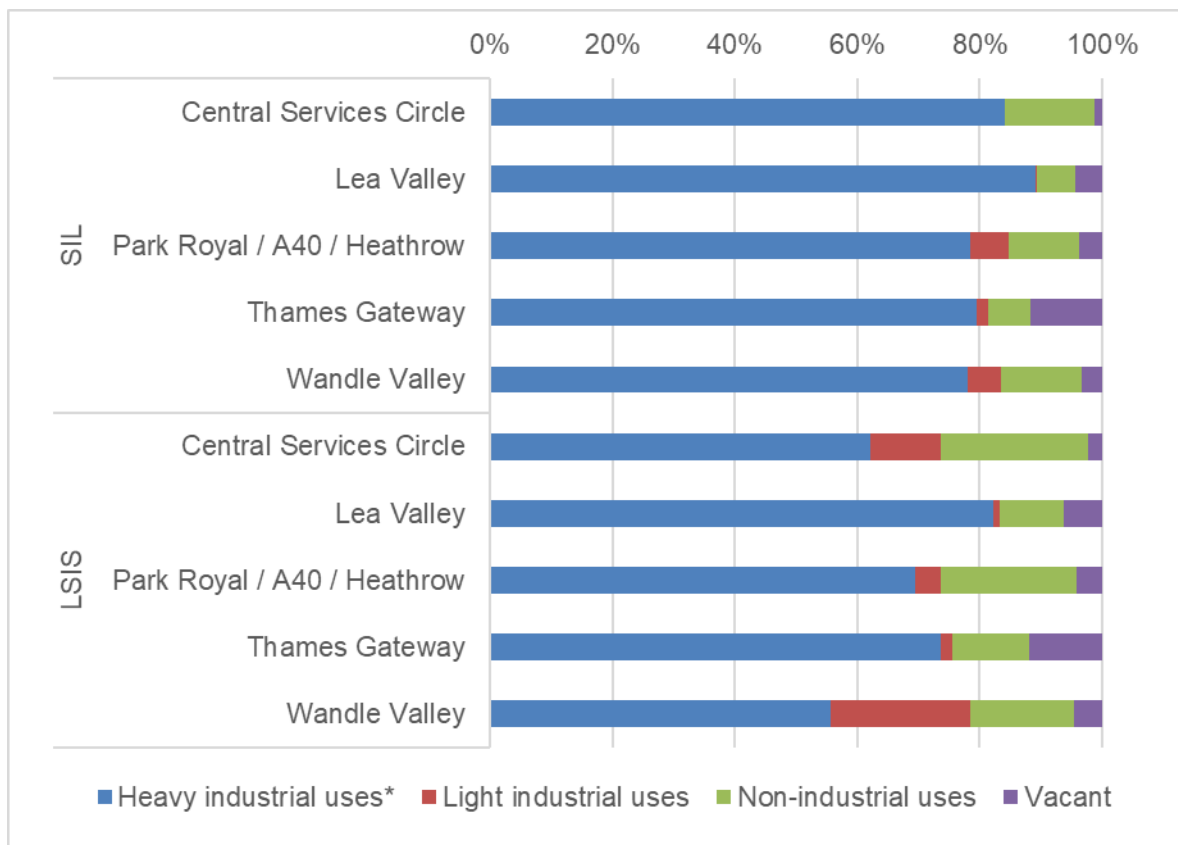
¹¹³ Collectively referred to hereafter in this paper as “*heavy*” industrial uses

appropriate. This matter is discussed further below and in the concluding sub-section 6.5.

6.2.9 Figure 6.2 includes data on the average proportion of vacant land in SIL and LSIS recorded in 2015. Since 2015 a significant amount of vacant industrial land has either been brought back into active industrial use or has been transferred to other non-industrial uses, particularly in the Thames Gateway.¹¹⁴

6.2.10 The GLA is currently updating the industrial land baseline in London. Emerging estimates suggest that vacancy rates are significantly lower than they were when the 2015 baseline study was undertaken. It is anticipated that the study will be published on the GLA website in the autumn of 2021.

Figure 6.2 Average proportions of land in heavy, light and non-industrial uses in SIL and LSIS in London's industrial property market areas

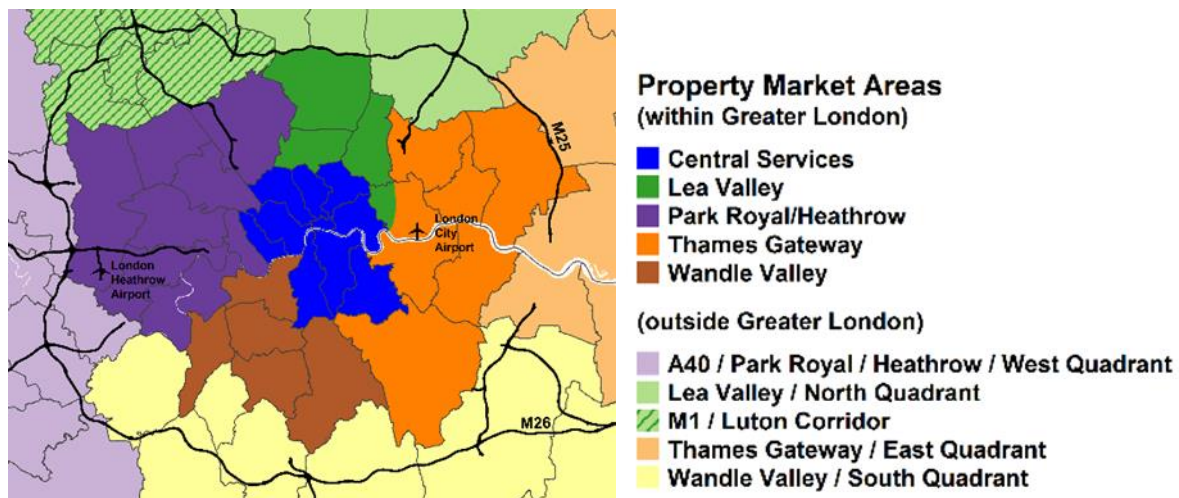


Source: AECOM. London Industrial Land Supply and Economy Study, 2016 / GLA analysis

* 'Heavy industrial uses' include general industrial, storage and distribution uses, waste management, utilities, land for transport functions and wholesale markets (see paragraph 6.2.4).

¹¹⁴ The [Newham Local Plan](#) adopted in 2018 for example managed the transfer of significant amounts of industrial land previously identified as vacant to other non-industrial uses.

Figure 6.3 Industrial property market areas* in London



Source: CAG Consultants. London Industrial Land Demand Study, October 2017 / AECOM, We Made That. London Industrial Land Supply and Economy Study, 2016 / GLA analysis.

* Property Market Areas are indicative for use in data analysis.

Class E uses in SIL and LSIS and potential impacts of PDR

- 6.2.11 Light industrial is one of the various sub-categories of use within Use Class E and is directly affected by the new PDR. Light industrial uses include a range of activities that are important to servicing the wider London economy including the day-to-day needs of other businesses and residents. They also provide relatively low-cost accommodation supporting SMEs, including creative production uses and new business start-ups.
- 6.2.12 Estimates suggest that 99.8 per cent of all industrial businesses in London employ less than 250 employees and that 90 per cent of those businesses are micro-businesses employing less than 10 people.¹¹⁵ Despite the size limit of 1,500 sq.m, Class E to residential PDR will have a direct disproportionate impact on industrial SMEs in addition to the indirect impacts on industrial businesses (of any size) located in proximity to PDR conversions.
- 6.2.13 Class E also contains a wide range of other non-industrial uses including offices, research & development, shops and some community services, all of which could potentially be converted to residential via the new PDR (subject to the limitations in the legislation). Strategic evidence¹¹⁶ shows that within two years of the introduction of office to residential PDR in 2013, more than 83,000 sq.m of office floorspace located within London's industrial areas

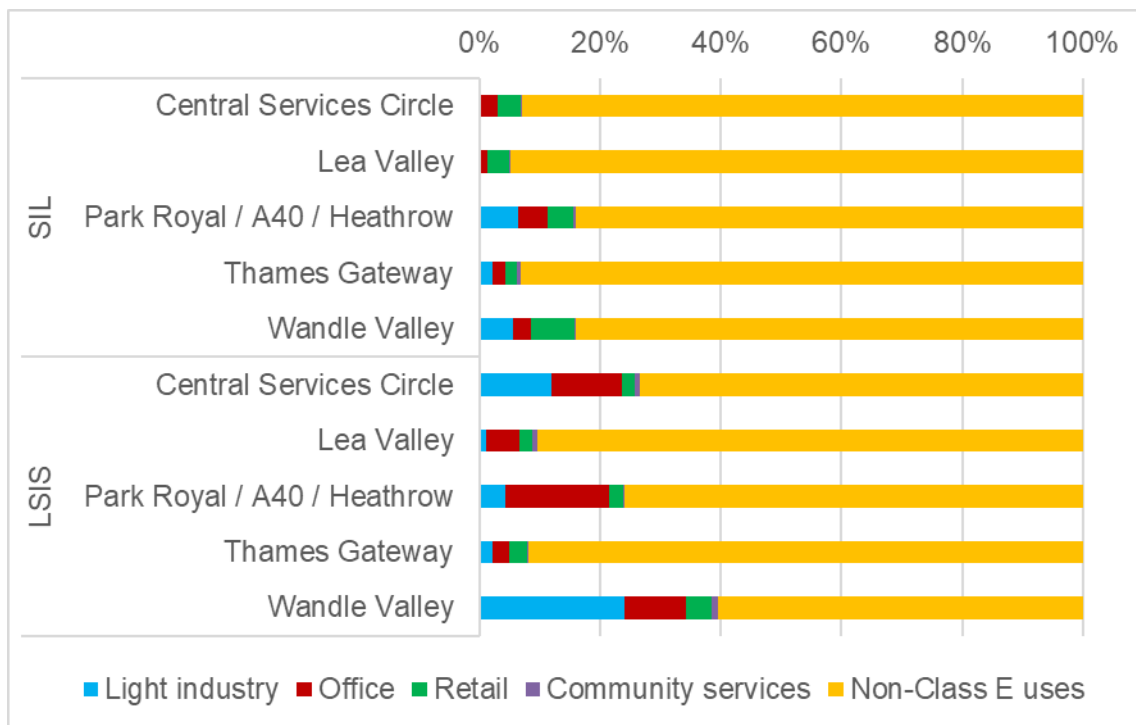
¹¹⁵ [AECOM, We Made That. Industrial Land Supply and Economy Study, March 2016](#)

¹¹⁶ [AECOM, We Made That. Industrial Land Supply and Economy Study, March 2016](#) Table 2-11 and Figure 2-25

gained prior approval for conversion to residential. Several boroughs responded with Article 4 Directions to limit the impact of further conversions.

6.2.14 Figure 6.4 illustrates the average proportion of occupied industrial land in Class E uses in SIL and LSIS in each of London's PMAs. For SILs, the average proportion of occupied industrial land in Class E uses ranges from 5 per cent in the Lea Valley PMA to 16 per cent in the Park Royal / A40 / Heathrow and Wandle Valley PMAs. For LSIS, the average proportions are higher, ranging from 8 per cent in the Thames Gateway and Lea Valley PMAs to 40 per cent in the Wandle Valley PMA. For reasons noted in paragraph 6.2.7, the estimated proportions of SIL and LSIS in light industrial use in Figure 6.4 are likely to be an under-estimate.

Figure 6.4 Average proportion of occupied industrial land in Class E uses and Non-Class E uses in London



Source: AECOM, We Made That. London Industrial Land Supply and Economy Study, 2016 GLA analysis / GLA analysis

6.2.15 In principle therefore, both SIL and LSIS could be vulnerable to Class E to residential PDR conversions. As discussed in paragraph 6.2.8, there is some uncertainty about the practical interpretation of the clause in the legislation regarding areas that a local authority considers to be *important for general or heavy industry, waste management, storage and distribution, or a mix of such uses*. This uncertainty could lead to speculation and a risk of rising values or 'hope' value, in anticipation of the potential to convert to residential via PDR, potentially making the land uncompetitive for lower capital value

industrial uses. Given this uncertainty and the potential for land value speculation, it could be appropriate for local authorities to adopt a 'belt and braces' approach and introduce Article 4 Directions for SIL and LSIS where this is necessary and supported by local evidence.

Impacts of PDR on plan-led co-location of industrial and residential in LSIS

- 6.2.16 The London Plan encourages boroughs to define the range of appropriate uses in their LSIS having regard to the different operational requirements of various industrial uses and strategic and local evidence of supply and demand for industrial uses. The Plan also allows boroughs to consider whether their LSIS, in full or in part, could be intensified for industrial uses and whether there is scope for co-locating industrial with residential and other uses in LSIS, to be managed through a Local Plan or masterplan process.¹¹⁷
- 6.2.17 Where a borough has indicated that an LSIS is suitable for industrial intensification with residential co-location, there is a risk that such locations could be particularly vulnerable to Class E to residential PDR conversions as it may be more difficult in such circumstances to rely on clause MA.2.(2)(g) in the legislation. The ad hoc nature of PDR conversions in these locations could undermine the industrial activities in an LSIS and fail to optimise the industrial and housing development capacity that could otherwise have been delivered through Local Plan-led and masterplan processes. Article 4 Directions would therefore be appropriate to mitigate against negative impacts on industrial occupiers and to fully allow for opportunities for industrial intensification and co-location with housing in LSIS to be realised.

Impacts of PDR on industrial capacity servicing the CAZ and NIOD

- 6.2.18 The nationally and internationally significant agglomerations of commercial, cultural, leisure and hospitality functions in the CAZ and NIOD rely on an efficient supply of essential supporting functions. These functions include sustainable distribution and logistics; 'just-in-time' servicing such as food service activities, printing, administrative and support services, office supplies, repair and maintenance, construction, waste management and recycling, and land to support transport functions.
- 6.2.19 In the high-value land market within the CAZ there is very limited remaining industrial and logistics capacity¹¹⁸ and many of these essential support functions to the CAZ and NIOD are provided by businesses occupying industrial land typically (though not exclusively) lying in close proximity to the

¹¹⁷ See London Plan Policy E7 B

¹¹⁸ [AECOM, We Made That. Industrial Land Supply and Economy Study, March 2016](#)

CAZ and NIOD – and commonly found in LSIS and in Non-Designated Industrial Sites.

- 6.2.20 Section 7 of this report highlights the differentials between industrial and non-industrial land values in London which puts immense pressure on sites in industrial use for conversion to non-industrial uses.¹¹⁹ To address this issue the London Plan includes policy¹²⁰ to ensure that sufficient capacity for industry and logistics is identified and protected, including last mile distribution, freight consolidation and other related service functions within or close to the CAZ and NIOD to support the needs of businesses and activities within these areas.
- 6.2.21 Given the importance of industrial capacity providing essential support functions to the CAZ and NIOD, the use of Article 4 Directions to remove Class E to residential PDR will be particularly relevant for industrial sites performing this function.

6.3 Non-Designated Industrial Sites

- 6.3.1 Non-Designated Industrial Sites (illustrated in Figure 6.1) comprise around one-third of London's industrial capacity and cumulatively of strategic importance to London. They include a diverse range of industrial uses (some of which fall within Use Class E) and they range from single sites to clusters of sites in industrial use.
- 6.3.2 As noted in paragraph 6.2.11, light industrial is one of the various sub-categories of use within Use Class E and so directly affected by the new PDR. In addition to essential services to support London's businesses and residents, light industrial uses also include small scale maker spaces and culture-oriented creative production uses such as artist workspace, fashion design and rehearsal space for example.
- 6.3.3 Light industrial uses in Non-Designated Industrial Sites are often found in non-prime locations such as back-of-town centre and high street locations, contributing to their vibrancy and providing access to relatively low-cost workspace suitable for new start-up businesses. As residential development tends to command higher capital values than such uses (see Section 7), they have been particularly vulnerable to conversion to residential use in recent years.¹²¹ The risk of closure of existing artists workspace remains high and 24 per cent of sites (57 in total) providing artists' workspace are at risk of closure within the next 5 years. This because so few organisations

¹¹⁹ [CAG Consultants. London Industrial Land Demand Study, October 2017](#)

¹²⁰ Policy SD4 M

¹²¹ [We Made That. Artists' Workspace Study - Report and Recommendations ; AECOM, We Made That. Industrial Land Supply and Economy Study, March 2016](#)

own the freehold to sites (around 13 per cent).¹²² Article 4 Directions to remove Class E to residential PDR could be appropriate to safeguard important capacity in Non-Designated Industrial Sites for maker spaces, artists' workspace and other culture-oriented creative production uses (see also sub-section 6.4 below).

- 6.3.4 In theory, 'heavy' industrial uses (which fall within the Use Classes B2 and B8 or classified as *sui generis*) would not fall within Class E to residential PDR. When considering Article 4 Directions for specific Non-Designated Industrial Sites boroughs should have regard to the blurring between uses which are light industrial in nature (falling within Class E) and those which are general industrial, storage or distribution in nature (and classified in the B2 or B8 Use Class). Boroughs should also have regard to whether conversions of Class E light industrial uses could undermine neighbouring industrial uses (in any Use Class) in Non-Designated Industrial Sites that comprise clusters of sites in industrial use.

6.4 Creative Enterprise Zones

- 6.4.1 Creative industries play an important role in London's economy and its cultural offer and as a sector they are growing at a faster rate than any other area of the economy. As part of his support for the creative industries, the Mayor is committed to working with boroughs and other relevant stakeholders to identify and set up Creative Enterprise Zones (CEZs).
- 6.4.2 CEZs support the provision of dedicated small industrial and creative workspaces and seek to address issues of affordability and suitability of workspaces for artists and creative businesses. They adopt a range of policy levers including, but not limited to planning, to stimulate and ensure the growth of creative industries in geographically targeted areas. They help to support an important but fragile part of London's economy and culture, and they can help boost the local economy of more deprived areas and support their regeneration.
- 6.4.3 Article 4 Directions to remove Class E to residential PDR may be particularly appropriate in CEZs to ensure that suitable business space and affordable workspace is available for existing creative businesses and for new start-ups.

6.5 Conclusions

- 6.5.1 Industrial land in London provides vital capacity for industrial, logistics and related uses that are essential to the functioning of its economy and for servicing the needs of its growing population. The 2021 London Plan seeks to retain sufficient capacity for these uses in appropriate locations and

¹²² [We Made That. 2018 Artists Workspace Study Data Note, August 2018](#)

introduces innovative new concepts including industrial intensification, co-location and substitution which are designed to meet the needs of industrial businesses whilst securing opportunities in appropriate locations to deliver housing through proactive plan-led and masterplanned development.

- 6.5.2 The strategic evidence, reflecting the London Plan policy approach, indicates that SIL and LSIS should be considered as areas that are '*important for heavy industry, waste management, storage and distribution, or a mix of such uses*' (in the terms used in clause MA.2.(2)(g) in the legislation).
- 6.5.3 Notwithstanding the clause MA.2.(2)(g) in the legislation, the strategic evidence supports a 'belt and braces' approach to the introduction of Article 4 Directions in SIL and LSIS to ensure that they are not undermined by Class E to residential PDR. Examples of the circumstances where Article 4 Directions might be particularly appropriate include:
- where the SIL/LSIS, or parts of the SIL/LSIS, contain a greater proportion of lighter industrial activities and/or where local authorities may find it difficult to rely on clause MA.2.(2)(g) in the legislation
 - where there is a high risk of land speculation resulting in the SIL/LSIS becoming less competitive for lower value industrial uses
 - where it is necessary to realise opportunities for commercial to residential PDR via plan-led approaches to industrial intensification and co-location in SIL and LSIS
 - where it is necessary to ensure that housing delivery on sites identified for industrial and residential co-location is optimised and that the industrial uses can continue to operate efficiently
 - where it is necessary to ensure that sufficient capacity for industry and logistics providing essential services to the CAZ and NIOD is not undermined by commercial to residential PDR
 - in Creative Enterprise Zones, to ensure that suitable business space and affordable workspace is available for existing creative businesses and for new start-ups.
- 6.5.4 The above list of circumstances is not intended to be exhaustive and there may be other local justifications for Article 4 Directions to remove Class E to residential PDR in SIL/LSIS.
- 6.5.5 For Non-Designated Industrial Sites, Article 4 Directions would be particularly appropriate to safeguard important capacity for light industrial, maker space and culture-oriented creative production uses and to safeguard industrial activities that comprise clusters of sites in industrial and related uses.

7. Commercial and residential values in London

7.1 Introduction

- 7.1.1 The difference between the value of offices, retail and light industrial properties relative to residential use in London, is such that the new Class E to residential permitted development rights could see a significant loss of commercial uses to residential. This could result in significant negative impacts on the CAZ and NIOD, other strategically important office locations, town centres, high streets and industrial areas.
- 7.1.2 This section presents more detailed evidence on the value of property in residential use and assesses these against values in the new Business, Commercial and Service use (Class E) including offices, retail and light industrial use in different parts of London.

7.2 Residential values

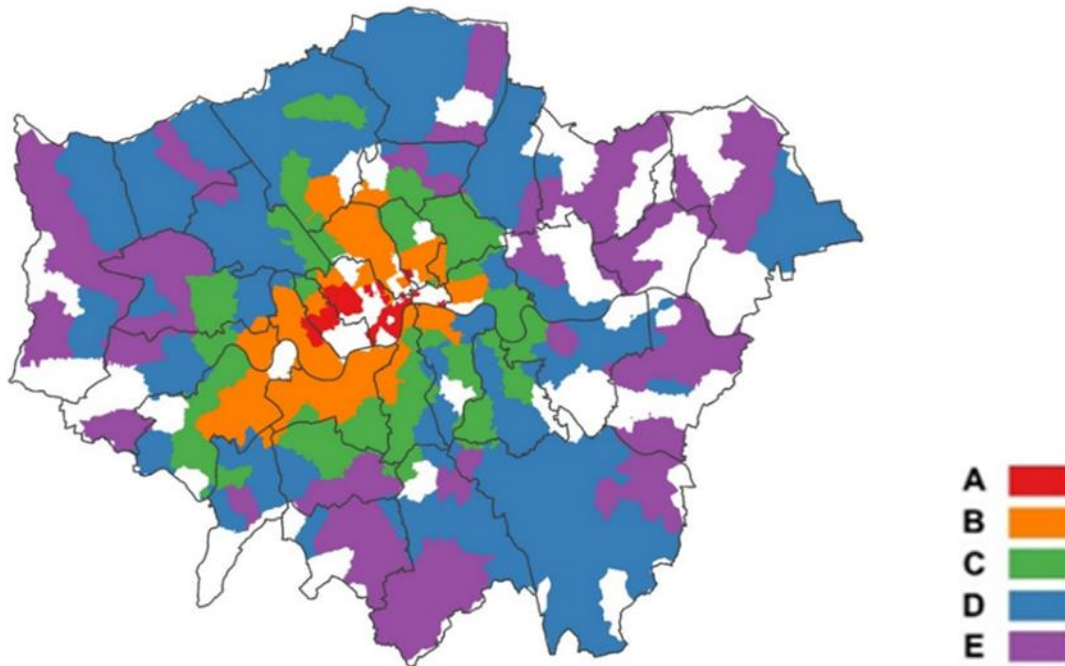
- 7.2.1 The London Plan Viability Study (LPVS)¹²³ and Addendum Report¹²⁴ included an assessment of average capital values in residential use in different parts of the capital. The studies collated average values of new build residential development based upon a sample of transactions in various 'value bands'. The LVPS defined value bands based on postcode districts, illustrated in Figure 7.1, where 'A' represents the highest value band and 'E' the lowest value band.
- 7.2.2 Figure 7.2 presents average capital values for residential use in 2017 for each value band (A to E). These values are based upon the provision of 100 per cent market housing which is appropriate for comparative purposes here given that residential units created through Class E to residential PDR conversions do not have to provide affordable housing under the government regulations.
- 7.2.3 A recent report from Molior¹²⁵ recorded an average residential capital value of £863 per square foot (£9,289 per square metre) for new build transactions between January 2020 and March 2021. Using the Molior data disaggregated at borough level, the GLA has calculated the corresponding average capital values for residential value bands A to E. The results are presented in Figure 7.3.

¹²³ [Three Dragons et al. London Plan Viability Study, December 2017](#)

¹²⁴ [Three Dragons et al. London Plan Viability Study Addendum Report, November 2018](#)

¹²⁵ Molior London. Residential Development Research. Quarterly Analysis, April 2021

Figure 7.1 Indicative value bands for residential



Source: Three Dragons

Figure 7.2 Indicative average capital values in residential use in 2017 by value band (£ per square metre) derived from the London Plan Viability Study

	A	B	C	D	E
Jul-17	£20,000	£12,000	£8,250	£6,250	£4,250

Source: GLA analysis of Three Dragons

Figure 7.3 Indicative average capital values in residential use in 2020/21 by value band (£ per square metre) derived from Molior data

	A	B	C	D	E
Jan 2020 to March 2021	£21,648	£12,113	£9,179	£6,670	£5,343

Source: GLA analysis of Molior London. Residential Development Research. Quarterly Analysis, April 2021 (one significant outlier scheme in Value Band A excluded)

7.2.4 Over the next five years, residential capital values are forecast to increase. Figure 7.4 presents a range of forecasts from agent research and indicates that values are projected to increase on average by around 3 per cent per annum over the period 2021 to 2025.

Figure 7.4 Summary of agent forecasts for growth in residential capital values, 2021–2025

Research	Date	Region	2021	2022	2023	2024	2025	Average
CBRE	Q3 2020	UK	1.0%	3.0%	4.5%	4.3%	--	3.2%
Savills	Mar-21	All Prime London	2.5%	6.0%	3.5%	2.0%	3.0%	3.4%
JLL	Nov-20	Greater London	0.0%	2.5%	5.0%	6.5%	5.0%	3.8%
Knight Frank	Jan-21	Greater London	1.0%	2.0%	3.0%	3.0%	4.0%	2.6%
Overall average next 5 years								c.3.2%

Source: GLA analysis of agent research

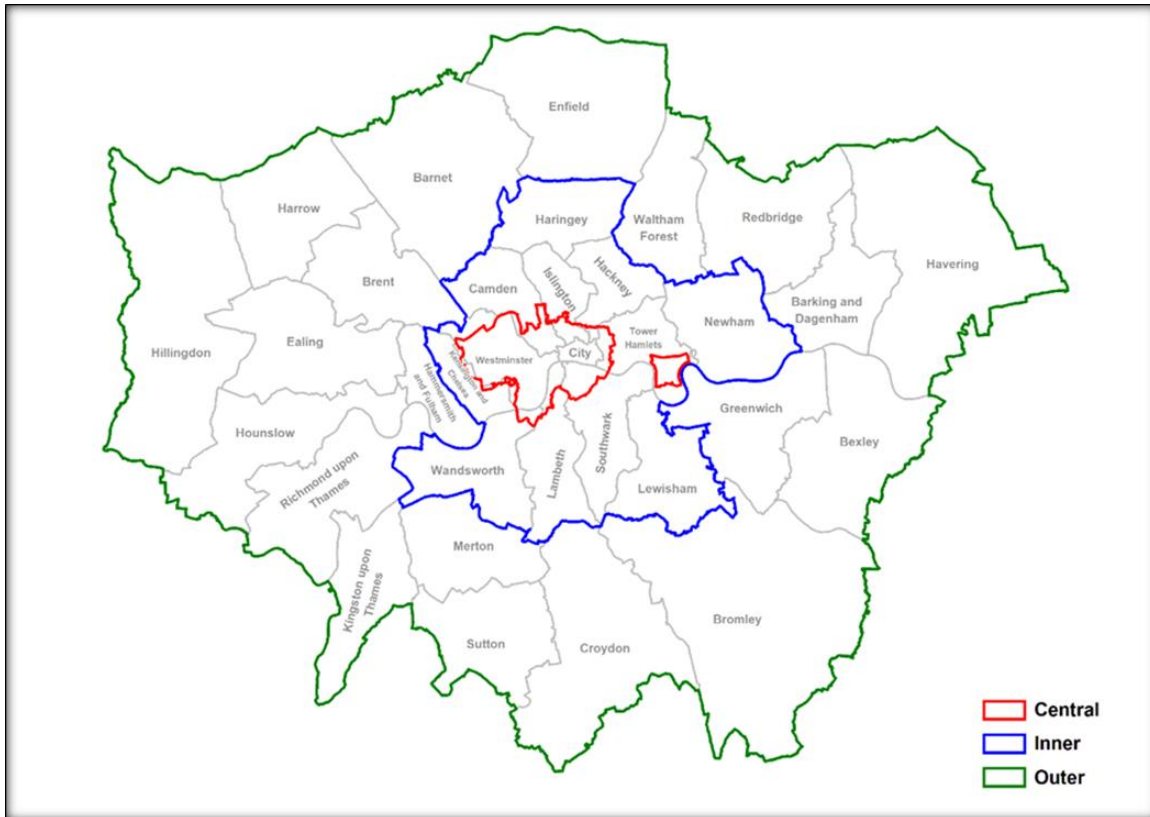
7.3 Commercial values

7.3.1 For commercial uses the value bands used in the London Plan Viability Study have been adopted for this report for consistency and these are illustrated in Figure 7.5.

7.3.2 Indicative average capital values in office, retail and industrial¹²⁶ use have been derived from CoStar market rent and market yield data for each of the commercial use value bands. The outputs of this analysis are presented in Figure 7.6.

¹²⁶ Note: Industrial values in this section refer to all industrial uses combined including light industrial (Use Class Eg(iii)), general industrial (Use Class B2) and storage and distribution (Use Class B8).

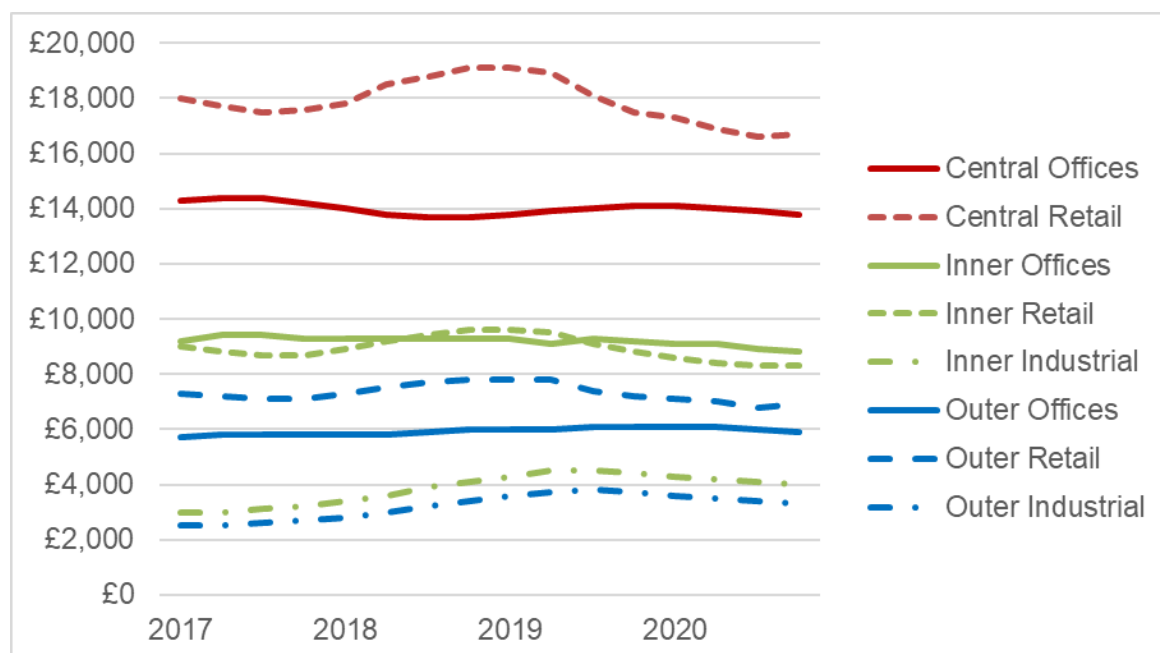
Figure 7.5 Value bands for Class E (non-residential) uses



Source: Three Dragons

Note: Whilst these bandings cover all of London, the commercial uses and the values associated with them will be derived from specific locations and clusters within them, for example the CAZ, town centres, industrial areas and other business clusters.

Figure 7.6 Indicative average capital values in non-residential use by value band (£ per square metre)



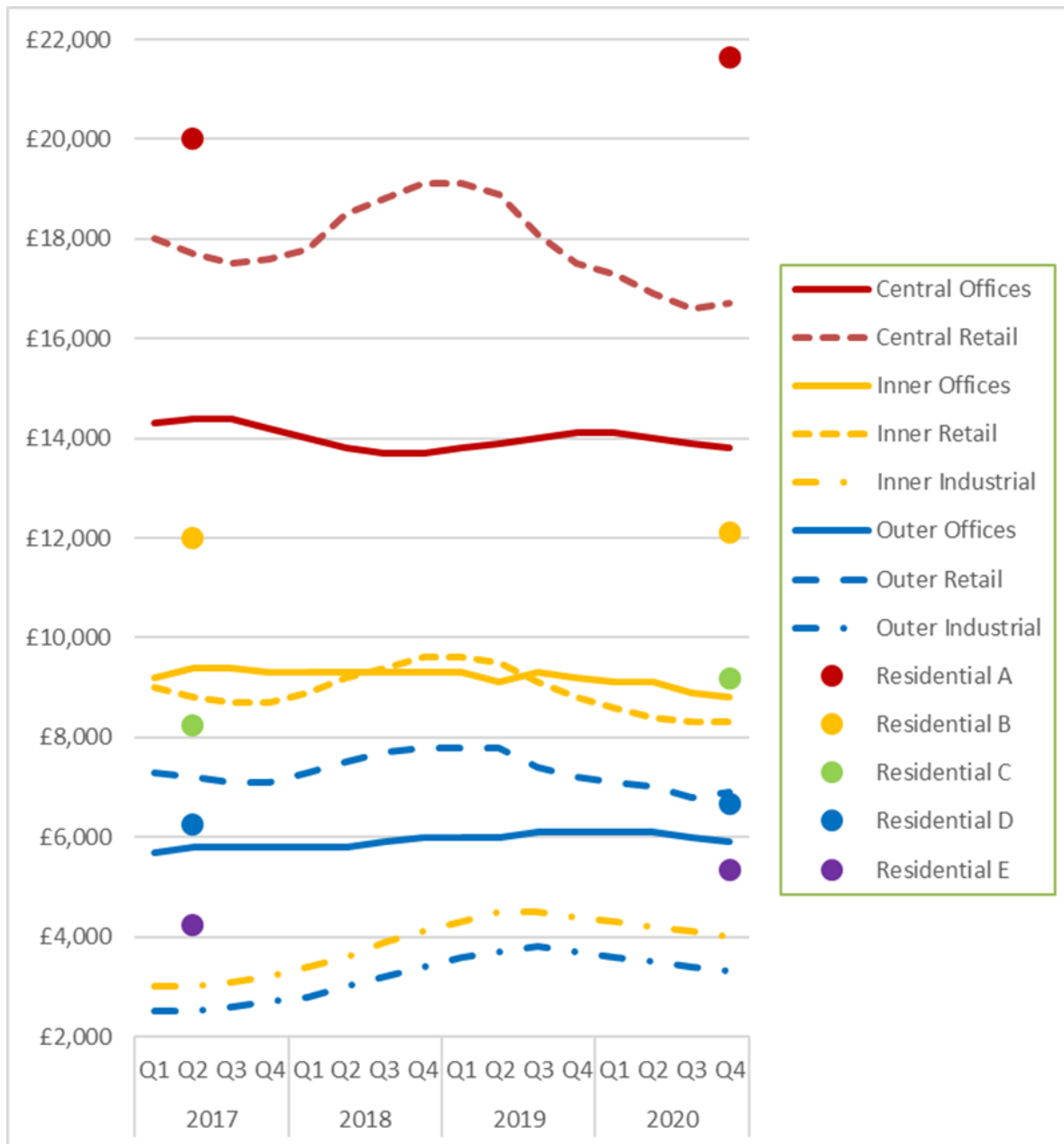
Source: GLA analysis of CoStar market rent and yield data. There are insufficient records for 'Industrial' in the Central value band, hence no data for this use. The values presented are based on indicative averages for the commercial value bands. Actual values will vary locally.

7.3.3 Figure 7.7 presents an indicative comparison of average capital values in residential and non-residential use by value band over the period 2017 to 2020. It should be noted that the values for residential and non-residential capital values in Figure 7.7 are derived from different sources. Furthermore, the values presented in Figure 7.7 are averages, so there could be significant local variations in residential and commercial values.

7.3.4 With these caveats in mind, Figure 7.7 presents some interesting findings:

- 1) Average values in Residential Band A (central London) are typically greater than average central London office and retail capital values.
- 2) Average values in Residential Band B (inner London) are typically greater than average inner London office and retail values.
- 3) Average values in Residential Band C (inner London) are broadly comparable to average values for inner London offices and retail.
- 4) Average values in Residential Band D (outer London) are now broadly comparable with average values in outer London retail and marginally higher than average outer London office values (note caveats below).
- 5) All Residential value bands, including average values in Residential Band E are typically greater than average industrial values in inner and outer London.

Figure 7.7 Indicative comparison of average capital values in residential and non-residential use by value band (£ per square metre)



Sources: GLA analysis of Three Dragons (2017) and Molior data (2020/21) for residential values. GLA analysis of CoStar market rent and yield data for commercial values (2017-2020).

Notes for Figure 7.7

- 1: values for residential and non-residential capital values are derived from different sources.
- 2: the values are indicative averages - there could be significant local variations in residential and commercial values.
- 3: the values for inner and outer London offices are more likely to reflect higher value office locations especially in West and South London (where there are more transactions) - compared to lower value office areas other parts of London.

7.4 Conclusions

- 7.4.1 The dynamic underlying the Mayor's concerns over the potential impact of Class E to residential PDR is the relationship between the value of land in housing and the various types of commercial use within Use Class E.
- 7.4.2 The evidence presented here suggests, that in broad terms, average residential values exceed average office, retail and industrial values in most parts of London.
- 7.4.3 Whilst there may be some localised exceptions, there is a degree of volatility in commercial rents and yields over time and across business cycles (see for example Figures 3.8 and 3.10 in Section 3 of this report). It is very likely therefore that at different points on the business cycle, residential values would exceed commercial values in all parts of London, including within the CAZ.
- 7.4.4 The difference between the value of offices, retail and light industrial properties relative to residential use in London, is such that the new Class E to residential permitted development rights could see a significant loss of commercial uses to residential. The differential in value in residential use compared to commercial uses is such that PDR will impact all areas of London, including vibrant commercial areas, and not just areas of low commercial value.
- 7.4.5 Striking the right balance between commercial and residential uses is important to avoid the kind of market failure that leads to large-scale negative impacts arising from uncontrolled individual conversions. Having regard to the evidence on commercial and residential values presented here, targeted Article 4 Directions to safeguard London's vibrant commercial, business and cultural districts would be supported in appropriate circumstances (see Sections 3 to 6).

8. Supporting housing delivery and quality

8.1 Introduction

- 8.1.1 The Mayor is committed to increasing housing delivery across the capital. The 2021 London Plan sets out ambitious ten-year housing targets for every local planning authority, alongside Opportunity Area indicative capacities for longer-term delivery where the potential for new homes is especially high. Providing a range of high quality, affordable, well-designed, accessible homes is important to delivering Good Growth and ensuring that Londoners of all means and backgrounds can play their part in community life.
- 8.1.2 The need to optimise housing delivery in London, given the city's unique context, must remain a priority to address issues associated with the housing crisis. Permitted development rights could in some instances result in a failure to optimise site capacities, hampering London's overall delivery. Article 4 Directions to remove Class E to residential permitted rights may instead provide opportunities to optimise delivery in a way that permitted development cannot and even with Article 4s in place, a wide range of development options for housing delivery would remain. This section of the report provides supporting context and evidence on these development options and the development pipeline.

8.2 The London Plan and Housing Strategy

- 8.2.1 The Mayor has identified a need for **at least 66,000 new homes** to be built per year in London, for at least the next 20 years. To ensure that the ten-year housing targets are achieved, the London Plan provides a framework for delivery-focused Development Plans at borough level to allocate an appropriate range of sites and to optimise the potential delivery of housing on all suitable and available brownfield sites.¹²⁷ At the same time, boroughs are urged to establish ambitious and achievable build-out rates and help ensure that homes are built quickly. To meet the housing needs of Londoners and to maintain the function and resilience of the city as a whole, the Mayor has set a **strategic target of 50 per cent** of all new homes delivered across the capital to be affordable.
- 8.2.2 This paper provides strategic support for targeted Article 4 Directions to remove Class E to residential permitted development rights in the CAZ, NIOD, strategically significant office locations beyond the CAZ, town centres and high street and industrial areas. **The London Plan** contains policy to support the proactive delivery of housing in these locations.

¹²⁷ [Mayor of London. The London Plan 2021, March 2021](#), Policy H1

-
- 8.2.3 In the **CAZ**, the London Plan supports carefully planned housing in ways that complement the strategic functions of the Zone - including its internationally renowned commerce, culture, tourism, shopping and night-time economy – whilst delivering new quality homes. It is vital that housing delivered in the CAZ and NIOD does not compromise the agglomerations of office and other commercial development nor undermine the current and future potential to assemble and deliver office and other commercial development sites to accommodate future growth. This underlines the importance of Article 4 Directions in these locations.
- 8.2.4 Section 3 of this report illustrated the particular role of the 12 CAZ Opportunity Areas for their potential to deliver more than 91,000 homes. The Mayor will provide the support and leadership to ensure Opportunity Areas deliver their growth potential for Londoners and to realise their capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity.
- 8.2.5 The NIOD is part of the much wider Isle of Dogs Opportunity Area, which could accommodate more than 30,000 new homes. So far, an Isle of Dogs and South Poplar Opportunity Area Planning Framework (OAPF) has been published¹²⁸ which demonstrates how - through careful planning - the area can increase housing delivery to take the borough beyond London Plan housing targets and fully realise the opportunities for large scale growth. In terms of delivery, the Mayor and the London Borough of Tower Hamlets has also established a partnership board for the area, to take forward recommendations around infrastructure in the OAPF, developing strategies to ensure infrastructure doesn't act as a barrier to growth.
- 8.2.6 The London Plan identifies **town centres and high streets** as locations for mixed-use or housing-led intensification to optimise residential growth potential, securing a high-quality environment and complementing local character. Where office and other commercial space is proven to be genuinely surplus to requirements, London Plan policies ensure that this is re-purposed or redeveloped for other uses including good quality market and affordable housing, and supporting infrastructure.
- 8.2.7 Alongside his planning powers, the Mayor is committed to using funding and other measures to unlock housing development opportunities and increase the supply of good quality homes that meet Londoners' diverse needs.

¹²⁸ [Mayor of London. Isle of Dogs and South Poplar Opportunity Area Planning Framework, September 2019](#)

8.2.8 The **London Housing Strategy**¹²⁹ sets out the Mayor's proposals for working with boroughs and other partners to deliver the step change in housing supply required, through:

- proactive intervention in London's land market to unlock and accelerate housing delivery, including on public land and through compulsory purchase and other forms of land assembly
- increased and better-targeted investment to de-risk development and maximise opportunities from new transport infrastructure
- diversification of the housebuilding industry through increased Build to Rent development, more support for small and medium-sized builders, and more supply from councils and housing associations
- tackling the construction skills gap and modernising construction methods.

8.2.9 The **COVID-19 Housing Delivery Taskforce**¹³⁰ chaired and convened by Deputy Mayor for Housing and Residential Development Tom Copley, brought together leaders from across London's housing delivery sector including councils, construction, unions and housing associations. The Taskforce considered specific support needed to maintain housing supply and provide confidence in the market, as well as what can be achieved by collaboration between the Mayor, councils and the housing delivery sector working in partnership.

8.3 Housing delivery and pipeline

8.3.1 There is evidence of a rising trend in housing delivery in the CAZ, NIOD, town centres and high streets. Figure 8.1 shows that annual average housing completions in the CAZ and NIOD increased from around 2,600 per annum during the four-year period April 2012 to March 2016, to over 4,700 per annum over the four-year period April 2016 to March 2020, an increase of around 80 per cent. This uplift was delivered entirely through conventional planning approvals since office to residential PDR does not apply in the CAZ and NIOD due to the original exemptions and recent Article 4 Directions (see Section 3).

8.3.2 Housing delivery in town centres and high streets in London also increased over the period April 2012 to March 2020, despite office to residential Article 4 Directions being introduced for several town centre locations. Figure 8.1

¹²⁹ <https://www.london.gov.uk/what-we-do/housing-and-land/tackling-londons-housing-crisis>

¹³⁰ <https://www.london.gov.uk/what-we-do/housing-and-land/increasing-housing-supply/covid-19-housing-delivery-taskforce>

illustrates the particular importance of edge-of-centre town centre and high street locations for housing delivery.

Figure 8.1 Annual average housing completions in the CAZ/NIOD, town centres and high streets in London, April 2012 – March 2020

	Annual average April 2012 – March 2016	Annual average April 2016 – March 2020
CAZ + NIOD	2,649	4,732
Town centres	5,627	8,939
Town centres + 800m buffer	18,372	22,683
High Streets	8,834	10,662
High Streets + 800m buffer	14,874	17,846

Source: Planning London Datahub. Note figures cannot be summed due to overlapping geographies.

8.3.3 There is also a healthy housing development pipeline in the CAZ, NIOD, town centres and high street locations where the Mayor supports Class E to residential Article 4 Directions (see Figure 8.2). In the CAZ and NIOD alone, there are 37,000 dwellings in the planning pipeline (13 per cent of the total pipeline). Within London's town centres there are more than 58,000 dwellings in the pipeline, or 21 per cent of the London total. When sites within 800 metres of a town centre are included, the pipeline rises to over 108,000 dwellings, almost 40 per cent of the London total.

Figure 8.2 Housing pipeline in CAZ/NIOD, town centres and high streets in London, 2019

	Number of dwellings in the planning pipeline	% of London total
CAZ + NIOD	36,918	13%
Town centres	58,787	21%
Town centres + 800m buffer	108,260	39%
High Streets	54,796	20%
High Streets + 800m buffer	77,014	28%
London	278,794	100%

Source: Planning London Datahub data recorded on 28 May 2021. Pipeline subject to daily changes in permissions granted and lapsed and borough reporting. Note figures cannot be summed due to overlapping geographies.

8.3.4 Figure 8.2 includes housing developments with planning permission that are either under construction or not yet started on site. Based on evidence in the Strategic Housing Land Availability Assessment (SHLAA) almost 30 per cent of London's housing capacity on large sites is located within or on the edge of a town centre – providing capacity for 197,000 homes over the first 10 years of the new 2021 London Plan. This demonstrates that in London, the planning system will continue to deliver sustainable development and respond to the needs of the market – both commercial and housing – by

ensuring sufficient space for commercial uses in town centres and high streets whilst delivering high quality, housing and mixed-use development.

8.4 Use of Article 4 Directions to support greater levels of housing delivery

- 8.4.1 In London, housing needs are high, and issues of affordability and homelessness are acute. This coupled with constraints to land supply, including significant green belt, means that it is essential that every parcel of available land appropriate for housing development, is optimised.
- 8.4.2 Class E to residential PDR allows for existing buildings to convert to residential use utilising an existing footprint, scale and layout. Whilst this may deliver some homes in the very short term, inevitably this could result in missed opportunities for significant housing delivery where sites have already been identified for redevelopment for residential or residential-led mixed-use (in some instances including the existing on-site uses), or that may become suitable for such development over time. Following the permitted development route may not realise a site's optimum potential benefit. This can best be achieved through masterplans or design considerations that would account for site features and context and enable appropriate higher density development.
- 8.4.3 It is also important to recognise that because PDR development does not include affordable housing, this creates a 'cliff edge' for investment decisions. It is likely to be the case that for some developments the financial hurdle of the affordable housing requirement from full planning permission cannot be overcome by the additional value generated by comprehensively redeveloping the site. This results in permitted development schemes that fail to deliver the amount of development a site is capable of accommodating because it is not cost effective to go down the planning application route. Overall, PDR inflates land values which is a disincentive to requiring and redeveloping land comprehensively.
- 8.4.4 In London, scarce land supply means that finding new sites elsewhere that could make up for under delivery caused by PDR is extremely challenging. Optimising all sites that are suitable for housing development therefore is essential.
- 8.4.5 Article 4 Directions can also be a useful tool for ensuring that development capacity is optimised, particularly where comprehensive redevelopment is planned. They may be appropriate for large housing or mixed-used sites, including sites safeguarded for strategic infrastructure. Article 4 Directions can also support the realisation of housing targets for the Opportunity Areas and the wider implementation of Opportunity Area Planning Frameworks and masterplans.

-
- 8.4.6 Article 4 Directions could be used in situations where a more holistic approach to development and site assembly is needed in and around town centres. This can support both a greater quantity and better quality of housing and new commercial development (where there is demand) compared to ad hoc conversions through the PDR route.

8.5 Conclusions

- 8.5.1 The Mayor is committed to increase housing delivery in London and continues to use his funding and planning powers to unlock housing development opportunities and increase the supply of good quality homes that meet Londoners' diverse needs.
- 8.5.2 The London Plan contains policy to ensure the proactive delivery of housing in locations where the Mayor is providing strategic support for Article 4 Directions to remove Class E to residential permitted development rights, including the CAZ, NIOD, town centres and high streets. There is also a healthy housing development pipeline in these locations.
- 8.5.3 In the context of the national housing crisis and constrained land supply, it is essential that all sources of supply – if appropriate for housing delivery – are used to best effect. Article 4 Directions can be a useful tool for ensuring that development capacity is optimised through site allocations, masterplans and town centre strategies, delivering better outcomes for housing delivery, housing quality and place-making.

Item No.	Classification: Open	Date:	Meeting Name: Planning Committee
Report title:		Development Management	
Ward(s) or groups affected:		All	
From:		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

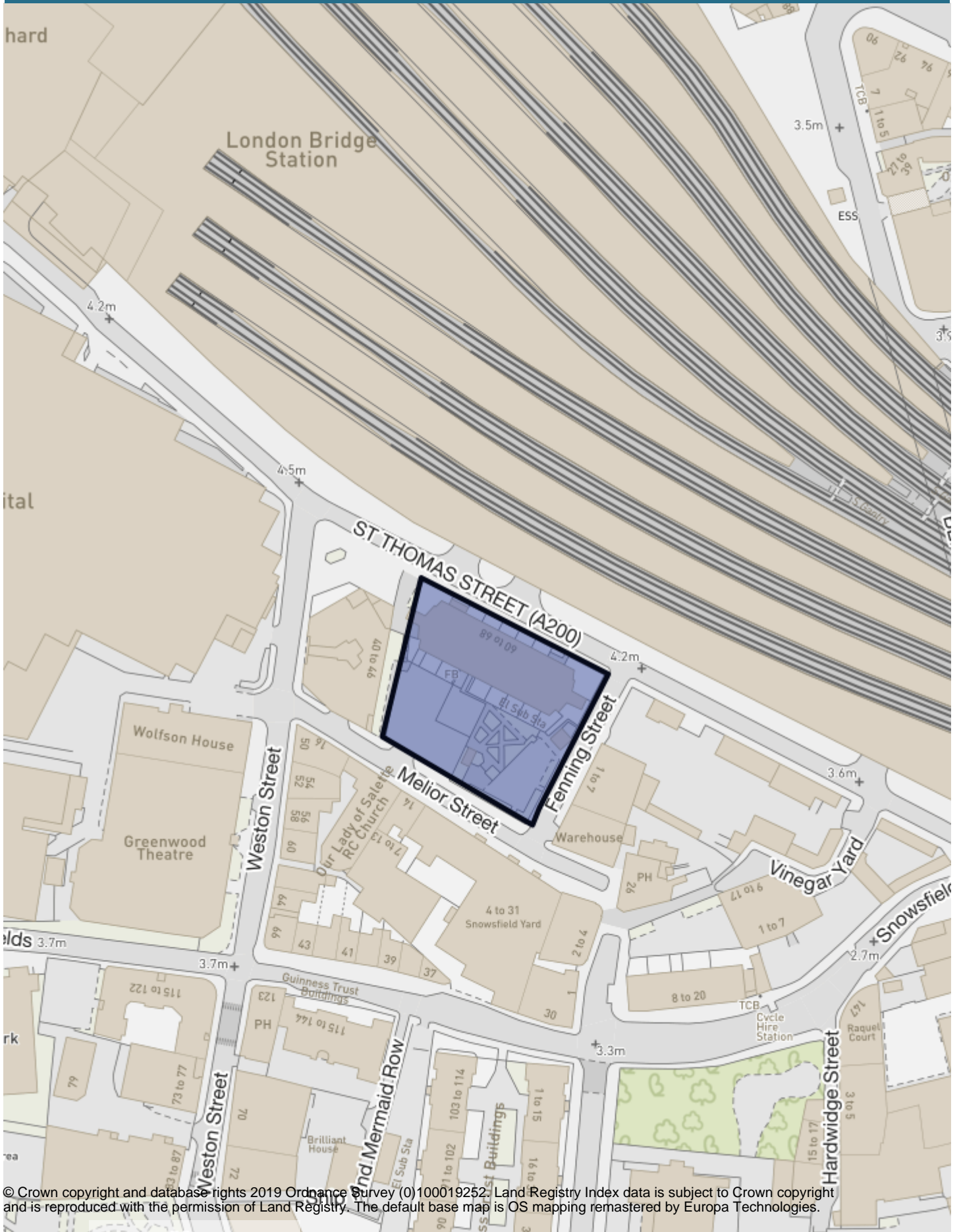
Background Papers	Held At	Contact
Council assembly agenda 23 May 2012	Constitutional Team 160 Tooley Street London SE1 2QH	Virginia Wynn-Jones 020 7525 7055
Each planning committee item has a separate planning case file	Development Management 160 Tooley Street London SE1 2QH	Planning Department 020 7525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

APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Chidilim Agada, Head of Constitutional Services	
Report Author	Everton Roberts, Principal Constitutional Officer Jonathan Gorst, Head of Regeneration and Development	
Version	Final	
Dated	7 June 2019	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments sought	Comments included
Director of Law and Democracy	Yes	Yes
Director of Planning	No	No
Cabinet Member	No	No
Date final report sent to Constitutional Team		7 June 2019



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Item No.	Classification:	Date:	Meeting Name:
7.1	OPEN	20 July 2021	Planning Committee
Report title:	Development Management planning application: Application 20/AP/0944 for: Full Planning Application Address: BECKET HOUSE, 60-68 ST THOMAS STREET, LONDON, SE1 3QU. Proposal: Redevelopment of the site to include demolition of Becket House and the erection of a 27 storey building with additional level of plant and basement levels in order to provide office use (Class B1), retail (flexible Class A1/A3), cycle parking, servicing, refuse and plant areas, public realm improvements and other associated works incidental to the development.		
Ward(s) or groups affected:	London Bridge and West Bermondsey		
From:	Director of Planning and Growth		
Application Start Date	24.04.2020	PPA Expiry Date	31.12.2021
Earliest Decision Date	10.04.2021		

UPDATE

1. This application was deferred from the Planning Committee scheduled for the 9th June following a late objection from the Home Office who are the current occupiers of Becket House.
2. The Home Office had objected to the development in the days leading up to the committee on the basis that their planned relocation to a new premises in Newham had fallen through and that, in line with London Plan Policy S1 and comments made by the GLA as part of the Stage I response, the applicant must confirm that the Home Office would not be displaced as a result of the development without suitable alternative accommodation having been secured.
3. The Home Office's planned move to new accommodation in the London Borough of Newham fell through, through no fault of the applicant and following further discussion, the applicant has agreed to give the Home Office additional time to find a new premises. As such, the Home Office have advised the Council that they wish to fully withdraw their objection.
4. Additionally, it should be noted that the GLA based their Stage I response on the draft text of the New London Plan and that the wording of this policy was updated following the Examination in Public preceding adoption of the new plan in March 2021.

5. The adopted wording of Policy S1 no longer makes reference to public function as set out in the Stage I response. Instead, the policy now states that Boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social infrastructure.
6. The Council has recently completed its own social infrastructure assessment (2019) as part of the New Southwark Plan submission, as required by the London Plan Policy SP1. This assessment didn't identify the Home Office facility at Becket House as a need, a fact not challenged by the Home Office during consultation on the NSP. Furthermore, the Council recently completed the Examination in Public on the NSP and again the site allocation, which doesn't identify the immigration centre as social infrastructure, was not challenged by the Home Office or the GLA in response to the plan consultation.
7. London Plan 2021 Policy SP1 specifies that "Development proposals that would result in a loss of social infrastructure in an area of defined need as identified in the boroughs social infrastructure needs assessment required under part A shall only be permitted where;..". Given that the Home Office facility at Becket House is not considered 'social infrastructure' and hasn't been identified as such in the Borough's needs based assessment, officers are satisfied that the proposals are not contrary to London Plan Policy SP1 and that the relevant policy would not apply in this instance. This position has been confirmed by the GLA who have advised that where a Borough has an up to date needs assessment that identifies areas of defined need, a proposal that would result in the loss of social infrastructure outside an area of defined need would not be contrary policy S1. In this case, not only is the existing use not classed as social infrastructure but it would not result in the loss of a defined need.

RECOMMENDATION

8. That planning permission be granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.
9. That, should planning permission be granted, it be confirmed that an Environmental Impact Assessment has been undertaken as required by Regulation 3 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017.
10. That following issue of the decision it be confirmed that the Director of Planning shall place a statement on the Statutory Register pursuant to Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations and for the purposes of Regulation 30(1) (d) the main reasons and considerations on which the Local Planning Authority's decision is based shall be set out as in this report.
11. In the event that the requirements of paragraph 1 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 374.

EXECUTIVE SUMMARY

12. The proposal is for a large commercial development comprising mainly office with some ancillary retail use at ground floor level. At 27 commercial storeys, the proposed development would be classed as a tall building and would be located on the Becket House site which is bounded by St Thomas Street, Fenning Street, Melior Street and the Capital House site.
13. The proposed development would be a constituent part of a wider development framework that covers the eastern St Thomas Street area running from Weston Street to Bermondsey Street and includes the neighbouring sites known as Capital House; Vinegar Yard; and the buildings at the northern end of Bermondsey Street/Snowsfields and the Vinegar Yard Warehouse. The sites' landowners have sought to coordinate an approach for comprehensive redevelopment and have established a framework for developing the area.
14. The framework envisages a series of individual buildings that reinforce the street edges of Weston Street, St Thomas Street and Snowsfields and define a public garden to the rear towards Melior Street and a new public plaza towards Snowsfields. It retains north-south routes across the site and opens up a new east-west pedestrian route that bisects the framework area, linking Weston Street with the two new public spaces and through to Bermondsey Street. The application site is not located within a conservation area nor does it contain any listed buildings. The Bermondsey Street conservation area sits to the south and the east of the site.
15. The development has been conceived as a single, tall building, set back from its western boundary to create a generous new pocket park which would wrap around the southern boundary of the site and create new north-south pedestrian linkages and visual connections. The development would see the open space on site more than double in size which would be a suitable and high quality replacement for the current Melior Street Garden. The development would achieve an Urban Greening Factor of 0.3 which is in line with the London Plan requirements. At street level the proposed building would be much more engaging with active frontages and visual interest along St Thomas Street, Melior Street and the edge of the proposed pocket park.
16. The design of the new office building is considered to be of the highest quality befitting of a building of this scale in such a central London location where the standard of new development architecture is one of excellence. The proposed office accommodation would be of a high standard and would meet the needs of modern office users. The development would include 10% of the uplift in office floorspace as affordable workspace which would meet the demands of micro to medium sized businesses as well as start-ups and enterprises looking to expand.
17. The development would be highly energy efficient and sustainable with an on-site carbon reduction of 55.1% above the 2013 Building Regulations in addition to a carbon offset payment that would help the development achieve Carbon Zero targets. It is expected that the development would achieve BREEAM

'Outstanding' and this would be a conditioned requirement of any consent.

18. The site is located in the Central Activities Zone, the Bankside Borough and London Bridge Opportunity Area and the London Bridge District Town Centre, and is allocated in the New Southwark Plan as NSP50. The proposals are consistent with the site allocation and the objectives of the development plan for this area.
19. The impact on the amenity of neighbours in terms of privacy, outlook and daylight/sunlight is set out in the report, and it is noted that the daylight/sunlight impacts on a small number of residential properties closest to the site are significant. These impacts need to be considered in the context of the character of the area in line with the flexibility expected by the BRE when looking at dense urban environments. These impacts also need to be balanced against the significant benefits of delivering this scheme.
20. A total of 1373 letters were sent to local residents as part of the neighbour consultation exercise and 75 letters of objection were received (including three received post publication of the report in advance of the originally planned Planning Committee on the 9th June). A total of 12 letters of support have also been received. The main points of the objections are set out below along with the number of times they have been raised. A detailed breakdown of the objections is included at paragraph 384.

Objection topic	Number of time raised
Height/scale/massing	41
Heritage issues	28
Post Covid office requirements	21
Transport and traffic	19
Wind	19
Overbearing	17
Daylight/sunlight/overshadowing	14
Pressure on community facilities	6
Fire and emergency services	5
Lack of public benefits	5
Construction impacts	5
Consultation	5
Detailed design	4
Impact on the Shard	4
Privacy	4
Views	4
Noise	3
Pollution	3
Community garden	1
Light pollution	1
Safety and security	1
Vinegar Yard	1

BACKGROUND INFORMATION

Site location and description

21. The application site is located on the south side of St Thomas Street,

diagonally opposite the entrance to London Bridge Station. The 0.27 hectare site forms one half of a street block that runs between Weston Street to the west and Fenning Street to the east, with Melior Street to the south. The western boundary is formed by the Capital House site. The generally rectangular site comprises a freestanding six storey office building that is aligned with St Thomas Street and includes a large area of hardstanding used for ancillary car parking at the rear. Also to the rear of the site is the Melior Street Garden which is positioned at the corner of Melior Street and Fenning Street. This garden is classed as Other Open Space in the New Southwark Plan and is managed by Team London Bridge in association with St Mungo's charity. Becket House is currently in use by The Home Office for immigration services. The Home Office are in the process of relocating this service to their facility at Royal Victoria Docks.

Existing Site Plan



22. London Bridge Station is located to the north of the site whilst the 310m tall London Bridge Tower (known as the Shard) is located to the north west. The redeveloped London Bridge Station, approved by the Council in 2012, includes a new entrance to St Thomas Street opposite the site. The new Shard Place building next to the Shard (on the former Fielden House) is currently nearing completion.
23. The Capital House site marks the western boundary of the application site and benefits from planning permission for a 39 storey tower comprising student accommodation. Just beyond this on the opposite side of Weston Street is the York Clinic, a five storey building, and Guy's Hospital Tower, a 34 storey building behind the York Clinic. To the southwest is Wolfson House, a 16 storey tower which is on a long-lease to Kings College for student accommodation. Wolfson House includes a swimming pool in its basement for use by Kings College students.
24. Immediately to the west of the application site on the opposite side of Fenning

Street is the site known as Vinegar Yard which is a live application currently with the Mayor for determination. To the south, on Melior Street, is a seven storey residential building and adjoining two storey church.

25. With the exception of the Horseshoe In and 9 Fenning Street to the east; the railway arches to the north; and a church to the south west, the immediate context of nearby buildings date from the 1970s to 1980s. The application site is not in a Conservation Area but the Bermondsey Street Conservation Area is adjacent to the site, to the south and south east (taking in the southern side of Melior Street). The Borough High Street Conservation Area lies some 180m to the west and the Tooley Street Conservation Area lies to the north of London Bridge Station (approximately 140m from the site).

Existing Becket House



26. Nearby listed buildings include; The George Inn (Grade I listed, 300m from the site to the west); Guys Hospital Main Building (Grade II*, 180m to the north-west); 4-16 St Thomas Street (Grade II, 280m to the north-west); 9A-13 St Thomas Street (Grade II, 270m to the north-west); 15 St Thomas Street (Grade II, 240m to the north-west); 55, 59-63 and 68-76 Bermondsey Street (all Grade II, approximately 220m to the south-east). A more recent listing is the Railway Viaduct Arches on Crucifix Lane (Grade II), which are on the northern side of St Thomas Street.

Details of proposal

27. Planning consent is sought for the redevelopment of the site to include demolition of Becket House and the erection of a 27 storey building with additional plant level and four levels of basement.

28. The principal use of the building would be for Class B1 office space (36,786sqm GIA) however there would be a small retail unit at ground floor (40sqm GIA). An auditorium would be provided at first floor level for use by the buildings tenants and affordable workspace users on specified terms. Additional access to the auditorium would be made available for local community groups. Cycle parking and cyclist facilities such as showers, changing rooms and bicycle repair stations would be provided within the basement alongside plant and an ancillary gym space. Servicing would take place from Fenning Street where a servicing layby would be positioned immediately adjacent to the loading bay entrance.

Proposed Site Plan



29. The development would include a generous pocket park along the western boundary which would extend along the southern edge and would replace and extend the current Melior Street Garden which is designated as Other Open Space within the New Southwark Plan. This would create a generous new north-south route from St Thomas Street through to Melior Street and beyond as well as opening up views to the south. The pocket park would be extensively planted and would provide opportunities for outdoor seating. The planting would not be limited solely to the pocket park as it would extend into the groundfloor area of the new building as well as the upper floor terraces.

Planning history of the site

30. Whilst there is no specific history for the application site that is of relevance, the site has been the subject of two pre-application enquiries under references 18/EQ/0374 and 19/EQ/0198. The main issues discussed during these pre-

application enquiries related to height, scale massing, land use and impact on views and heritage assets. Additional issues discussed included the interaction of the proposed development with the other St Thomas Street schemes and amenity impacts on adjoining and nearby occupiers.

Planning history of adjoining or nearby sites.

31. London Bridge Tower (Shard of Glass) (ref 01/AP/0476):
Redevelopment of Southwark Towers for a 306m tower for offices, hotel, residential and public viewing areas. This development is now complete.
32. Guys Hospital new Cancer Building (ref: 12/AP/2062 granted January 2013):
Demolition of existing buildings on the corner of Great Maze Pond and Snowsfields and erection of a 14 storey building for a Cancer Treatment Centre (with an additional 2 storeys of roof plant) 71 metres in height and 29,000sqm floor area, with preservation in situ of a Scheduled Ancient Monument (Roman Boat), public realm works, disabled parking, cycle parking facilities and basement link to hospital campus. This development is now complete.
33. 14-16 Melior Street and Land adjoining to the rear of Our Lady of La Sallete and Saint Joseph Catholic Church (ref: 13/AP/3059 granted May 2014):
Part demolition and part refurbishment / change of use of existing buildings and erection of new buildings ranging from 4-7 storeys in height to provide 37 residential units (Class C3); a community centre (Class D1) and flexible commercial space at ground floor level (Class A1/A3/B1); cycle storage, new landscaping and associated works.
34. 147 Snowsfields (reference 20/AP/0744):
Demolition of existing buildings and construction of a 10 storey building plus basement consisting of 17 residential units, commercial at ground floor and basement and associated cycle and waste storage and other associated works. This application was refused planning permission on 6 July 2020 .

St Thomas Street East Framework

35. The application site forms one of the central sites of a series of adjacent development plots that have become known as St Thomas Street East. The adjacent sites include Capital House at 42-46 Weston Street; Vinegar Yard (including 1-7 and 9 Fenning Street); and the site known as Snowsfields which includes the Vinegar Yard Warehouse as well as the buildings at the top west side of Bermondsey Street. Details of these applications are set out below:

18/AP/0900 – CAPITAL HOUSE, 42-46 WESTON STREET, SE1 3QD

36. Redevelopment of the site to include the demolition of Capital House and the erection of a 39-storey building (3 basement levels and ground with mezzanine and 38 storeys) of a maximum height of 137.9m (AOD) to provide up to 905 student accommodation units (Sui Generis use), flexible retail/café/office floorspace (Class A1/A3/B1), cycle parking, servicing, refuse and plant areas, public realm improvements and other associated works incidental to the development. The application is accompanied by an Environmental Statement

submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

37. This application was approved with a Legal Agreement on 17 December 2020. The applicant is currently in the process of discharging pre-commencement conditions.

19/AP/0404 - 40-44 BERMONDSEY STREET, VINEGAR YARD WAREHOUSE
9-17 VINEGAR YARD AND LAND ADJACENT TO 1-7 SNOWFIELDS SE1

38. Demolition of existing buildings at 40-44 Bermondsey Street including partial demolition, rebuilding and refurbishment of existing Vinegar Yard Warehouse and erection of three new buildings (two linked) with up to two levels of basement and heights ranging from five storeys (24.2m AOD) to 17 storeys (67m AOD) to provide office space (Class B1); flexible retail space (Classes A1/A2/A3/A4/A5); new landscaping and public realm; reconfigured pedestrian and vehicular access; associated works to public highway; ancillary servicing; plant; storage and associated works.
39. This application was originally scheduled to be determined at the Planning Committee on the 29 June 2020. At this meeting, the chair of the planning committee moved a motion to defer this item to a future meeting of the committee so that certain aspects of the application and its planning impact on the conservation area could be considered in more detail in a future report. The applicant is currently considering amendments to the scheme and how the development interacts with the conservation area.

18/AP/4171 - LAND BOUNDED BY ST THOMAS STREET, FENNING STREET,
VINEGAR YARD AND SNOWFIELDS, INCLUDING NOS. 1-7 FENNING
STREET AND NO. 9 FENNING STREET, SE1 3QR

40. Redevelopment of the site to include the demolition of the existing buildings and the erection of a building up to 20 storeys in height (maximum height of 86.675m AOD) and a 3 storey pavilion building (maximum height of 16.680m AOD) with 3 basement levels across the site providing . The development would include use classes A1/A2/A3/A4/B1/D2 and sui generis (performance venue), cycle parking, servicing, refuse and plant areas, public realm (including soft and hard landscaping) and highway improvements and all other associated works.
41. This application was recommended for approval however the recommendation was overturned at Planning Committee on the 29 June 2020. Planning Committee members resolved to refuse planning permission for the following reason:
42. The proposed development by virtue of its excessive height, scale and massing would result in the loss of 9 Fenning Street and have an adverse impact on the Horseshoe Inn, both of which are undesignated heritage assets which make a positive contribution to the Bermondsey Street Conservation Area. The

proposed development would therefore fail to preserve or enhance the character and appearance of the Conservation Area. The heritage harm would not be outweighed by the public benefits. The proposed development is therefore contrary to Policy 3.15 Conservation of the Historic Environment: 3.16 Conservation Areas; 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites of the Saved Southwark Plan 2007; SP12 – Design and Conservation of the Core Strategy 2011 and Policy 7.8 - Heritage Assets and Archaeology of the London Plan 2016 and paragraphs 196 and 197 of the NPPF.

43. The resolution recommending refusal of planning permission was referred to the Mayor of London on 23 July 2020 for Stage II in accordance with the Mayor of London Order 2008. On 21 December 2020, the Mayor of London confirmed that he will act as local planning Authority for the purposes of determining the application for the following reasons:
44. a) The development would have a significant impact on the implementation of the London Plan because of the potential for the scheme to contribute towards the aims of the 2016 London Plan Policies 2.10, 2.11, 2.13, 3.2, 3.16, 3.17 and 4.2. The development would also support London's economy and role as a centre of excellence, and would have implications for London's continued success as a world city.
45. b) The development would have a significant effect on more than one London Borough because of a clear functional relationship with the wider Central Activities Zone, an area of nationally significant economic activity which contributes towards the strategic employment function of London as a whole, as well as the provision of specialised CAZ uses in the form of an outpatients facility that would benefit residents in other boroughs.
46. c) There are sound planning reasons for the Mayor's intervention because failure to promote appropriate development on sites such as this could potentially impact upon the economic wellbeing of the Central Activities Zone, the London Bridge, Bankside & Borough Opportunity Area and London as a whole, London's role as a centre of excellence, and the wider regeneration objectives for the Opportunity Area.
47. In making this decision the Mayor also clarified that he had considered the targets identified in development plans. The Mayor recognised that Southwark has experienced a borough-wide net loss of business floorspace in recent years and that new employment floorspace is required in order to deliver 400,000 – 500,000sqm of business floorspace within the London Bridge, Bankside & Borough Opportunity Area over the period 2009-2026 as set out in Southwark's Core Strategy. This application will be determined at a Hearing and this is not expected to be held before September 2021.
48. As previously stated these sites together have come to be known collectively as St Thomas Street East. The various landowners have been co-operating on an informal basis about a range of issues including design, public realm, new pedestrian routes, and the management of the construction and operational phases of the proposed developments. The landowners have devised a framework document which sets out the co-operation and co-ordination on

these issues between the proposed developments and this has been subject to community consultation. The framework is a tool to bring the landowners together to work collaboratively to address the main issues of the redevelopment of these sites. The framework itself is an informal document and is not an instrument of planning policy and as such it does not form part of the development plan.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

49. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use;
 - Affordable workspace
 - Environmental impact assessment
 - Design, including layout, building heights, landscaping and ecology;
 - Heritage considerations
 - Archaeology
 - 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
 - Environmental matters, including construction management, flooding and air quality
 - Energy and sustainability, including carbon emission reduction
 - Ecology and biodiversity
 - 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
50. These matters are discussed in detail in the 'Assessment' section of this report.

Legal context

51. 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.
52. 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

53. 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 (2019) 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.
54. The site is located within the:
- Air Quality Management Area
 - Bankside, Borough and London Bridge Strategic Cultural Area
 - Bankside, Borough and London Bridge Opportunity Area
 - Borough, Bermondsey and Rivers Archaeological Priority Zone
 - Central Activities Zone
 - London Bridge District Town Centre
 - The Thames Special Policy Area
55. 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.
56. 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.

The following listed buildings are either adjacent to or near the site:

- 55 Bermondsey Street – Grade II
 - Numbers 59, 61 and 63 Bermondsey Street and attached railings – Grade II
 - 68-76 Bermondsey Street – Grade II
 - Guys Hospital main building – Grade II*
 - Railway Arches Crucifix Lane – Grade II
57. The site itself is not located within a conservation area however the Bermondsey Street Conservation Area lies immediately to the south whilst the Tooley Street and the Borough High Street Conservation Areas lie to the north and west respectively.
58. The application site is located within London View Management Framework (LVMF) protected view 2A.1 from Parliament Hill summit to St Paul's Cathedral, and 3A.1 from Kenwood viewing gazebo to St Paul's Cathedral.

National Planning Policy Framework (NPPF)

59. The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy. The NPPF focuses on sustainable development with three key objectives: economic, social and

environmental. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

60. Chapter 2 Achieving sustainable development
 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

61. GG1: Building strong and inclusive communities
 GG2: Making the best use of land
 GG3: Creating a healthy city
 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
 D8: Public realm
 D9: Tall buildings
 D10: Basement development
 D12: Fire safety
 D14: Noise
 S1: Developing London's social infrastructure
 E1: Offices
 E2: Providing suitable business space
 E3: Affordable workspace
 E9: Retail, markets and hot food takeaways
 E11: Skills and opportunities for all
 HC1: Heritage conservation and growth
 HC2: World Heritage Sites
 HC3: Strategic and local views
 HC4: London View Management Framework
 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
 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.

The Core Strategy 2011

62. 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 10 - Jobs and businesses
 Strategic Policy 12 - Design and conservation
 Strategic Policy 13 - High environmental standards

The Southwark Plan 2007 (Saved policies)

63. 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 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. The relevant policies of the Southwark Plan 2007 are:

Policy 1.1 Access to Employment Opportunities
 Policy 1.4 Employment Sites
 Policy 1.7 Development within Town and Local Centres
 Policy 2.5 Planning Obligations
 Policy 3.1 Environmental Effects
 Policy 3.2 Protection of Amenity
 Policy 3.3 Sustainability Assessment
 Policy 3.4 Energy Efficiency
 Policy 3.6 Air Quality

Policy 3.7 Waste Reduction
 Policy 3.8 Waste Reduction
 Policy 3.9 Water
 Policy 3.11 Efficient Use of Land
 Policy 3.12 Quality in Design
 Policy 3.13 Urban Design
 Policy 3.14 Designing Out Crime
 Policy 3.15 Conservation of the Historic Environment
 Policy 3.16 Conservation Areas
 Policy 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites
 Policy 3.19 Archaeology
 Policy 3.20 Tall Buildings
 Policy 3.22 Important Local Views
 Policy 3.28 Biodiversity
 Policy 3.29 Development within the Thames Policy Area
 Policy 3.31 Flood Defences
 Policy 5.1 Locating Developments
 Policy 5.2 Transport Impacts
 Policy 5.3 Walking and Cycling
 Policy 5.6 Car Parking
 Policy 5.7 Parking Standards for Disabled People and the Mobility Impaired
 Policy 5.8 Other Parking

Supplementary Planning Documents

64. Design and Access Statements SPD 2007
 Section 106 Planning Obligations and CIL SPD 2015 and 2017 addendum
 Sustainability Assessment 2007
 Sustainable Design and Construction SPD 2009
 Sustainable Transport Planning SPD 2009

Greater London Authority Supplementary Guidance

65. Central Activities Zone (SPG 2016)
 Character and Context (SPG, 2014)
 Energy Assessment Guidance (2018)
 London View Management Framework (2012)
 London's World Heritage Sites (SPG 2012)
 Sustainable Design and Construction (Saved SPG, 2006)
 Town Centres (SPG, 2014)
 Use of Planning Obligations in the Funding of Crossrail 2010

Emerging policy

New Southwark Plan (NSP)

66. For the last 5 years the council has been preparing the New Southwark Plan (NSP) which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy.

67. The Examination in Public (EiP) commenced on 22nd February and the amendments within the Proposed Changes to the Submitted New Southwark Plan will be considered along with the consultation responses received at each stage of public consultation. It is anticipated that the plan will be adopted later this year following the EiP.

68. As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework. The most relevant policies of the NSP are as follows:

P12 Design of places

P13 Design quality

P15 Designing out crime

P16 Tall buildings

P17 Efficient use of land

P18 Listed buildings and structures

P19 Conservation areas

P22 Archaeology

P48 Public transport

P49 Highway impacts

P50 Walking

P52 Cycling

P53 Car parking (no substantial objections were received, comments related to minimising residential car parking)

P55 Protection of amenity

P58 Green infrastructure

P59 Biodiversity

P60 Trees

P61 Reducing waste

P63 Contaminated land and hazardous substances

P64 Improving air quality

P67 Reducing flood risk

P68 Sustainability standards.

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

- P27 - Access to employment and training – objection was received relating to the financial burden.
- P29 - Office and business development – objections related to the two year marketing justification and differentiation of B Class uses.
- P30 - Affordable workspace – objections relating to strengthening the policy and including viability testing.
- P34 - Town and local centres – objections relate to a lower threshold and strengthening the policy.
- P46 - Community uses – objections to strengthening this policy.
- P65 - Reducing noise pollution and enhancing soundscapes – the agent

of change principle in the NPPF must also be considered.

70. Where objections were received to a draft policy and these have not been resolved through revisions, that policy can have only limited weight. In these instances, the degree of change from adopted policy on these topics should also be considered. Examples of these policies include:
- P54 - Parking standards for disabled people and mobility impaired people.
 - P69 - Energy – objections that the December 2017 version P62 being too onerous for the carbon reductions
71. 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.

Site allocation NSP50

72. The application site is located within New Southwark Plan site allocation 50 – Land between Melior Street, St Thomas Street, Weston Street and Fenning Street.
73. The site allocation sets out that redevelopment of the site must:
- Provide at least the amount of employment floorspace (B use class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and
 - Enhance St Thomas Street by providing high quality public realm and active frontages including town centre uses (A1, A2, A3, A4, D1, D2) at ground floor.
74. The site allocation also considers that redevelopment should provide new housing.

ASSESSMENT

Principle of the proposed development in terms of land use

Introduction

75. The redevelopment of the site would be office led, creating a significant uplift in Class B1 office space in addition to the introduction of retail opportunities and an extensive new public realm which would improve animation, activity and interest at street level.

Policy background

76. The National Planning Policy Framework (NPPF) was updated in 2019. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and

supporting sustainable economic development. Relevant paragraphs of the NPPF are considered in detail throughout this report

77. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

London Bridge, Borough and Bankside Opportunity Area

78. The London Plan designates Bankside, Borough and London Bridge as one of four Opportunity Areas in the London South Central area.
79. The London Plan notes that this area has considerable potential for intensification and scope to develop the strengths of the area for strategic office provision. This is further reflected in Policy SD2 – Opportunity Areas of the London Plan which sets a target of 5,500 new jobs.
80. 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

81. 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 recognises the well-established long term demand for office space within the CAZ and strongly promotes office provision within this policy area.
82. 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.
83. In addition the site is within the London Bridge District Town Centre. Saved policy 1.7 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.

Bankside, Borough and London Bridge Strategic Cultural Area

84. The application site lies within the Bankside, Borough and London Bridge Strategic Cultural Area. Strategic Cultural Areas have been designated as such 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. However, these developments must focus on effective visitor

management and accessibility for all. Policy 1.11 of the Southwark Plan states that permission will be granted for new facilities provided they do not unacceptably compromise the character of an area. Whilst the proposed development does not include any visitor facilities the improved and extended open space will be of value to visitors.

Draft New Southwark Plan Site Allocation NSP50

85. The New Southwark Plan is in its Proposed Modifications for Examination version and was submitted to the Secretary of State in January 2020 for Local Plan Examination. The examination in public is currently underway and formal adoption is set to take place this year. Until formal adoption takes place, the policies will continue to have limited weight. The site is listed as an allocated site under the New Southwark Plan. The site allocation (NSP50) covers the application site as well as the Capital House site to the west.
86. The site allocation sets out that redevelopment of the site must:
- Provide at least the amount of employment floorspace (B use class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and
 - Enhance St Thomas Street by providing high quality public realm and active frontages including town centre uses (A1, A2, A3, A4, D1, D2) at ground floor.
87. The site allocation also considers that redevelopment should provide new housing and this requirement is considered to be satisfied by the Capital House development.

Conclusion on policy designations.

88. The principle of a large scale development containing a mix of uses including Class B1 office space and Class A1/A3 retail would support the role and functioning of the Central Activities Zone and the London Bridge 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.

Offices

89. The site falls within the CAZ, which contains London's geographical, economic and administrative core. The London Plan does not protect office floorspace in the CAZ; it strongly promotes the provision of office space and identifies office use as an appropriate land use in the CAZ, noting that there is capacity for 5,500 jobs in the Opportunity Area. This is further supported by the Mayoral Supplementary Planning Guidance – Central Activities Zone (2016).
90. Core Strategy Strategic Policy 10 Jobs and Businesses states that the council will increase the number of jobs in Southwark and create an environment in which businesses can thrive. The policy goes on to state that existing business floorspace would be protected and the provision of around 400,000sqm-500,000sqm of additional business floorspace would be

supported over the plan period in the Bankside, Borough and London Bridge Opportunity area to help meet central London's need for office space.

New office space



91. Saved policy 1.4 of the Southwark plan states that development will be permitted subject to there being no net loss of Class B floorspace (subject to a number of exceptions including)
92. The site currently provides 4,262sqm of employment floorspace. The proposed development would provide a total of 36,786sqm of Class B1 floorspace resulting in an uplift of 32,524sqm which meets the policy objectives of protecting employment floorspace and is welcomed as a significant benefit of the scheme. The provision of 36,786sqm of Class B1 floorspace would have the potential to provide up to 1,900 jobs which would be an uplift of approximately 1,430 jobs and 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.

Retail

93. The development would incorporate a small retail space at ground floor measuring approximately 40sqm. The provision of new town centre uses such as retail is supported by saved Southwark Plan Policy 1.7 since the site lies within the London Bridge District Town Centre. The introduction of retail use is welcomed and is considered to be entirely appropriate given that the site is within the London Bridge CAZ retail cluster and also accords with London Plan Policy SD4

Conclusion on land use

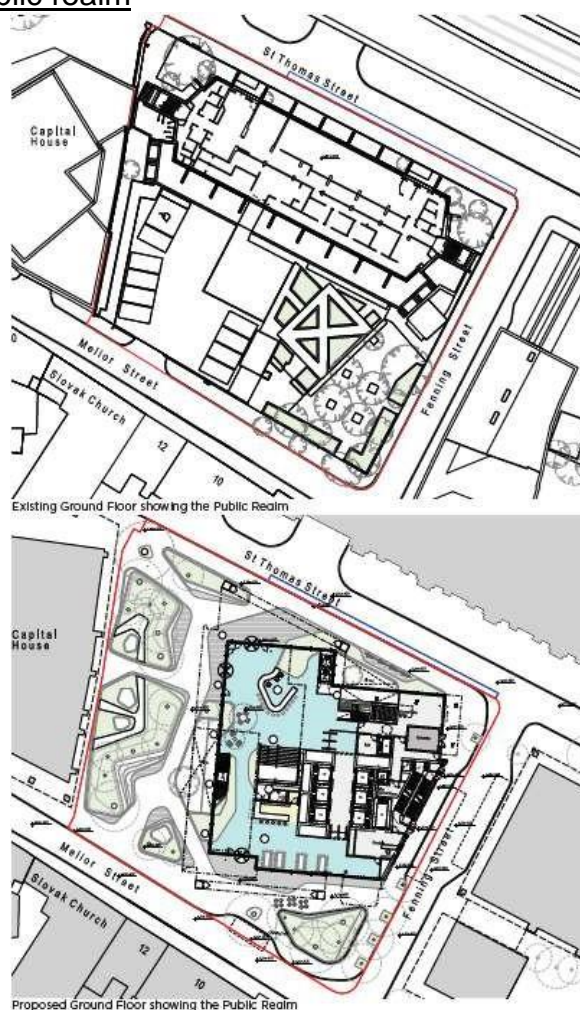
94. The proposal involves the provision of high quality office floorspace alongside a small retail space which is an acceptable town centre use. It is noted that the site allocation says that housing should be required however the site allocation covers the application site and the Capital House site and the provision of student housing on the Capital House site is considered to satisfy the housing requirement in the site allocation. The provision of new offices is fully supported and the provision of modern, high quality offices is considered to be

a benefit of the scheme and would facilitate the growth of employment within the Central Activities Zone and the Opportunity Area. The proposed development would include a mix of uses that are appropriate for the site's location within the CAZ, Opportunity Area and District town centre.

Other Open Space (OOS)

95. The application site includes the Melior Street Garden which is positioned on the corner of Melior Street and Fenning Street. The garden space is classed as Other Open Space within the New Southwark Plan and as such Policy P56 – Open Space, would apply. This policy states that development would only be considered in exceptional circumstances where it would consist of a replacement open space of equivalent or greater size or indeed if development would result in a substantially better quality space.

Proposed new public realm



96. The current Melior Street Garden provides approximately 576sqm of space. The proposed redevelopment of the site would create a public realm measuring approximately 1,183sqm in size, consisting of a pocket park which would extend along the western boundary of the site and along the southern boundary at Melior Street. This park would include larger areas of planting as well as opportunities for outdoor seating and would be substantially larger than the current garden space. The applicant is in discussions with St Mungo's charity, who currently manage the Melior Street Garden, in order to secure

their continued involvement on-site in managing the landscaped space. The proposed pocket park is considered to be a suitable and high quality replacement for the Melior Street Garden, being both more generous in size and more visible given its location between St Thomas Street and Melior Street. It should also be noted that the pocket park would assist the development in achieving an Urban Greening Factor of 0.3 which would be compliant with London Plan requirements.

Proposed pocket park



Affordable workspace

97. London Plan Policy E2 - Providing suitable business space, seeks the provision of low cost B1 business space to meet the demand of micro to medium sized business as well as start-ups and enterprises looking to expand. The policy is clear that proposals for new B1 spaces over 2500sqm in size (or a locally deemed lower threshold) should consider the provision of a proportion of workspace that would be suitable for these target businesses.
98. 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.
99. Emerging Policy P30 of the New Southwark Plan deals with affordable workspace. Criterion 2 of the policy requires Major 'B 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.

100. Taking into account the requirements of emerging policy P30, the proposed development would need to provide at least 10% of the new Class B1 floorspace as an affordable workspace. This would equate to 3,252sqm affordable workspace being required. The current offer is to provide 3,683qm of affordable workspace which would equate to 11%. As such the quantum of affordable workspace being provided is compliant with the London Plan and New Southwark Plan policies.

Proposed auditorium



101. The affordable workspace offer would be made up of four distinct elements as set out below:
102. Ground floor – At ground floor level a flexible workspace would be provided for all users. This space would be available for walk in use and would also be bookable via an app. This space would be operated by the building manager and the affordable workspace provider and would be offered for free at all times. The ground floor would make up 9% of the affordable workspace offer.
103. Auditorium – An auditorium would be provided between first and second floor levels. This would have capacity for 180 people and could be used for training, product launches and meetings. The auditorium would be offered for free for 20% of the available hours and would be bookable by small/medium sized business via the affordable workspace provider. The auditorium would makeup 10% of the overall affordable workspace offer.
104. Basement studios – Studio space would be provided at basement level and would be made available for free for 20% of the available hours. This space could be used for sound recording, video calls or fitness instructors/therapists that require self-contained studio space. The studios would be bookable via the affordable workspace provider and would constitute 6% of the affordable workspace offer.

Ground floor



105. Rented affordable workspace – Demised affordable workspace would be provided at lower ground, first and second floor level. These spaces would be operated by the affordable workspace provider and would provide office accommodation/flexible workspace with a capacity for up to 274 workstations. This space would comprise 75% of the affordable workspace offer and would be provided at a 25% discount on the market rent with an additional discounted period at the beginning of the lease which would staircase from a pepper corn rent to the 25% discount over a two year period as set out below:

- 0-6 months at 100% discount;
- 7-13 months at 60% discount on the Local Open Market Rent;
- 14-22 months at 40% discount on the Local Open Market Rent; and
- month 23 onwards at 75% of the Local Open Market Rent.

106. 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;
- 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.

107. The proposed Affordable Workspace Offer meets the policy requirement in terms of quantum of space. The demised workspace which makes up 75% of the overall offer will be offered on acceptable discounted terms whilst the auditorium, basement studios and the ground floor shared working space will be offered for free which is a significant benefit. The Council's Local Economy Team have reviewed the offer and are supportive of the proposal.

Environmental impact assessment

108. The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations 2017 and constitutes EIA development having regard to its potential for likely significant environmental effects.

109. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the Council has undertaken an Environmental Impact Assessment, taking account of the environmental information, which includes the ES, any further information, any representations made by consultation bodies, and any other person, about the environmental effects of the development.

110. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a Non-Technical Summary, Environmental Statement and Technical Appendices accompanies the application. That information has been taken into account. Officers are satisfied that the ES is up to date and that the effects described in the ES properly identify the likely significant effects of the proposed development on the environment.

Alternatives

111. The EIA Regulations require the ES to provide information on the alternative options considered by the applicant and this includes a 'Do Nothing' scenario. It is stated by the applicant's consultants and accepted by officers that the 'Do Nothing' alternative would leave the application site in its current state.

112. This scenario is considered in the ES to have no environmental benefits compared with the proposed redevelopment of the site as the 'Do Nothing' scenario would leave a sustainable, brownfield site in central London under used and would not bring forward the various benefits associated with development such as improved pedestrian connections, improved public realm and employment opportunities.

113. No alternative sites or locations have been considered for the proposed development as the site benefits from a site allocation and policy support to deliver a strategic development in this location.

114. The ES also describes the design evolution of the scheme which has been influenced by environmental factors, particularly townscape, LVMF Views and how the development responds to heritage assets. As such, the final version of the scheme has been designed having full regard to the constraints and

opportunities presented by the site as well as issues raised during the process.

Cumulative impacts

115. The ES considers cumulative effects arising from the proposed development in combination with other surrounding consented and planned developments and where relevant these effects are discussed further in the topic specific chapters later in the report.

Conclusions on the EIA

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

Design

117. The NPPF at Paragraph 124 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 and Policy D9 sets out the requirements for the development of tall buildings. The heritage policies 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.
118. The relevant Southwark design and conservation policies are Strategic Policy 12 of the Core Strategy and Saved Policies 3.12, 3.13, 3.15, 3.16, 3.17, 3.18 and 3.20 of the Southwark Plan. These policies require the highest possible standards of design for buildings and public spaces. The principles of good urban design must be taken into account in all developments including height, scale and massing, consideration of local context including historic environment, its character, and townscape strategic and local views.

Site context

119. The existing Becket House building dates from the late 1970s and has an architecture to match, with its strongly expressed concrete structural grid and profiled concrete cladding, with ribbon windows, beige coloured infill panels and aluminium flared soffits. The building features two simple entrances located towards either end of its St Thomas Street frontage, with adjacent end cores. The ground floor is generally disengaged from the street, behind mirrored glazing and a planted boundary. Its robust appearance is distinctive within the street scene, but of no particular architectural merit. It is distinctly of its period, and has a heavy, functional character that is unrelenting. The building is not listed and is not regarded as a non-designated heritage asset.

120. The site sits within a varied context of the grade II listed railway arches on St Thomas Street; the hoarded 0.3 ha Vinegar Yard site to the immediate east, with its pop-up retail, street food market and re-purposed industrial units onto Fenning Street; the 1970s part 2/ 10-storey Capital House (40-46 Weston St) to the west, and the 1980s, 16-storey Wolfson House (49 Weston Street) and the more recent 7-storey Bermondsey Wing of Guy's Hospital beyond; and the mixture of modest-scaled workshops, warehousing, housing and social infrastructure that date from the late Victorian through to the 1930s to the south. The nearby Horseshoe Inn Public House (no.26) and Our Lady of Salette and St Joseph Church with its adjacent staff house (nos.14-16) are notable buildings within Melior Street.
121. Melior Street forms the northern edge of the Bermondsey Street Conservation Area (Sub Area 3), which runs from Weston Street through to Snowsfields, returning briefly onto Fenning Street to include the 2-storey Victorian workshop (no.9) immediately south of the site. The application site itself is entirely outside the conservation area. Tooley Street and its conservation area are located just to the north of the site, immediately beyond London Bridge station and its viaducts; whilst Borough High Street Conservation Area and Tower Bridge Conservation Area are located some 400m to the west and north-east respectively.
122. The site falls within the Central Activities Zone (CAZ) and the Bankside, Borough and London Bridge (BBLB) Opportunity Area that are characterised in this location by a rich mix of historic and modern buildings, streets and places; the vibrancy and diversity of its uses; and by landmark buildings and infrastructure, including most noticeably the Shard, which dominates the skyline with its monumental scale and outstanding architecture.

Proposal

123. The scheme is conceived as part of a wider development framework that runs between Weston Street to the west and the head of Bermondsey Street to the east and includes the neighbouring development plots of Capital House, Vinegar Yard and Snowsfields (1-7 Vinegar Yard and 40 Bermondsey Street). The sites' landowners have sought to coordinate an approach for comprehensive redevelopment and have established a development framework for the area.
124. Briefly, the framework envisages a series of individual buildings that reinforce the street edges of Weston Street, St Thomas Street and Snowsfields, and define a public garden to the rear towards Melior Street and a new public plaza towards Snowsfields. It retains north-south routes across the site and opens up a new east-west pedestrian route that bisects the framework area, linking Weston Street with the two new public spaces and through to Bermondsey Street. The redevelopment schemes are mostly for commercial offices, but with significant elements of retail, leisure and student accommodation, and are mainly conceived as tall buildings.
125. The planning application scheme is for the clearance of the site; the excavation of four basement levels; and the construction of a new tall building within the northeast quadrant of the site, comprising 27 storeys, plus an additional storey

of plant, reaching a maximum height of 113.67m (AOD). The development would include the re-landscaping of the remaining space to provide a pocket park on the western section of the site and this would extend along the southern boundary with Melior Street to create an additional landscaped space. The building provides commercial offices but includes an extensive ground/1st floor lobby area that is open to the public as an indoor amenity/ informal office space with supporting café. The basement includes an additional level of commercial offices, as well as ancillary cycle storage and changing facilities, gym and plant room.

Site layout

126. The proposed site layout and building footprint is well-conceived both in presenting an engaging built form but also in organising the intervening public realm, providing a high quality public realm with high levels of access and informal surveillance.

Site layout



127. The building is positioned towards the south of the site, with its north and east facades aligned with the adjoining street geometry of St Thomas Street and Fenning Street, reinforcing the urban form. The north façade is positioned to respond to the emerging general building line along St Thomas Street, ensuring good continuity of the three dimensional public realm. The building's massing is then undercut onto St Thomas Street, with the ground to third floors recessed to provide a generous threshold space, soft landscaping and a basement lightwell. The main entrance is highly legible beneath the tall undercut, angled towards the direction of London Bridge Station. Fenning Street provides access to the servicing bay and other back-of-house services (including means of escape), which is a sensible arrangement, reflecting the secondary character of the street.
128. The building's footprint is then articulated to present its bulk into the site, with

its main elevation facing westwards and running parallel with that of the approved built form of Capital House. The intervening pocket park is mainly soft landscaping with trees and large planters, with the two parallel built forms bringing a visual coherency to the new gardens. The space fronts directly onto St Thomas Street and runs through to Melior Street at the rear, with the railway viaduct and terraced buildings at either end of the space visually closing the space to form a central garden square. The proposed building includes an additional ground floor entrance and a public auditorium space onto the west elevation, providing an active and engaging façade onto the new garden square.

129. The new pocket park works well to open up an engaging pedestrian pathway north south between Melior Street and St Thomas Street and onwards to the east-west onward route through the local area, as well as a better reveal of Our Lady of La Salette and St Joseph's Church with its attractive rose window.
130. Lastly, the building's south elevation is similarly articulated to chamfer back from the junction of Melior Street and Fenning Street, providing room for an additional, tree-lined pocket park space. This cut back similarly works well in several ways, promoting the onward east-west pedestrian route through the wider masterplan area; easing the sense of scale and amenity onto Melior Street; and opening up and softening the eastward townscape view along Melior Street towards the Horseshoe Public House and neighbouring Victorian warehouse. The south façade includes an entrance and café that would help animate the public realm.

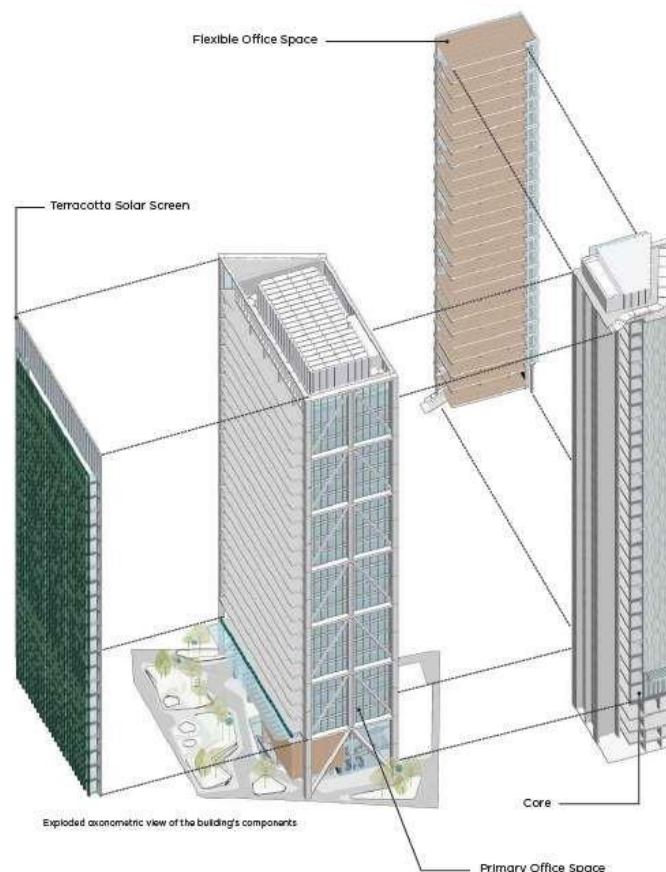
Built form and scale

131. The proposal is for a large floorplate building, typically providing just over 1200sqm of floorspace (GIA) on each of its upper floors, which is double that of the current building. The new building covers almost half of the site when assessed at upper floor level and, at 27 storeys above grade, the scheme makes for a substantial new office building. Nonetheless, the proposed built form carries this scale well, with its height and massing skilfully orchestrated to ease its sense of bulk.
132. The generous cutbacks over ground to third floor level reduces the sense of scale experienced at street level, whilst reducing the actual footprint or ground- take of the building to a third of the site, with the remainder being open space and mainly public realm. By then twisting the planform the development turns the bulk of the building inwards into the site. Eventually, this bulk will become mostly obscured from wider view by the neighbouring large-scale developments such as the approved Capital House.
133. The building's more outward-facing north and south elevations are narrower in breadth, but nonetheless articulated into a series of vertical elements, greatly reducing their visual bulk. This articulation is part and parcel of the building's clever architectural programme of 'served and servant' in which the main office floors and the service core form two adjoining but discrete volumes, with a supplementary office zone with stacked amenity spaces forming a third volume. By shaping, recessing and dressing each volume differently, the building is made to appear slender and well proportioned, particularly for an office building

of this scale.

134. Whilst the building is approximately 40m wide onto St Thomas Street, this clever arrangement has the visual effect of presenting a main front façade of approximately 21m in width, with the remaining volume articulating back and reading secondary in appearance. As such, the street façade is given a slender appearance with a width to height ration of 1:5, with the secondary element given a similar proportion. Returning to the west (pocket park) elevations, whilst it is broader at 49m, its façade is articulated at either end and has a projecting terracotta façade that helps to reduce its sense of scale. The east façade features a terracotta finish, though its massing is relieved by articulating the service core and amenity volume as visually distinct elements.

Built form



135. Importantly, the articulation of the massing is carried the full height of the building, with the three volumes stepping in height, giving the built form a visual integrity. The stacked terraces end with a roof top garden on the twenty fourth floor, whilst the service core ends on the twenty sixth floor with plant above that which is setback and hidden. The main office volume continues an additional floor, expressing its predominance and bringing a confident top of the building. As a detail, the terracotta framework on the garden façade finishes two floors below, allowing the main volume to read as a final flourish on the west elevation.
136. Overall, the massing is well-conceived, maximising the floorspace provision, whilst bringing a seemingly slender scale to the built form. The composite volumes bring visual interest, with the articulation effective and engaging in-the-round. It is noted that the building would be tall and distinctly taller than the

current building on site. However, its proposed height is intended to be seen in relation to the commercial/ institutional centre of London Bridge and its emerging cluster of tall buildings. At this height, the building sits comfortably within the range of tall buildings in the wider area.

137. In its more immediate setting, the scale is intended as an obvious and comfortable step down in height from the approved Capital House development which is consented at thirty nine residential storeys. The proposed height forms part of a series of tall buildings along St Thomas Street that continue to step down in height towards Bermondsey Street, with the proposed building playing its role in transitioning down to the hinterland's more domestic scale.

Architectural treatment

138. The detailed elevational architecture of the building complements its massing strategy, working together to reinforce the slender, composite built form. This is supplemented by introducing an elevational hierarchy of expressing a base, middle and top to the building that likewise eases the building's apparent scale.
139. The base reads mostly as a four storey high undercut onto St Thomas Street with a multi-level foyer/ public workspace that is continued round onto the West elevation which looks onto the new garden space. Its height and architectural treatment offers a highly transparent and engaging base, with large structural columns and bracing running through the space confirming its sense of scale and bringing something of a civic quality to the space. Whilst the tall base can be read on the south (Melior Street) elevation, the introduction of the auditorium and mezzanine floors brings a more intimate scale to the elevation and adjoining public realm. Overall, the base is well articulated and proportionate to the building's height and massing.

Western facade



140. At the other end, the design of the top is understated, but nonetheless works well, reading as the simple conclusion of each of the composite volumes. The volumes are seen to step in height, with the main office volume offering the

final flourish. The outcome is more a composed roofscape than a singular roof form, with the rooftop gardens above the amenity deck providing an element of rooftop greenery. In terms of the main body of the building, the elevational architecture is both engaging in itself and works well in the round, reinforcing the building's articulated massing.

141. The facades mainly comprise high quality, high performance unitised glazing with aluminium framing. For the main street-facing facades (north and south), the glazing is set deeply recessed within an expressed structural concrete frame with additional steel K-bracing, giving the building a robust, engineered appearance. The framework groups the elevation into four storey groups, giving the elevations a finer scale and strong visual order that is effective.

Fenning Street corner



142. The west façade has a softer and more intricate appearance, with a green terracotta screen that projects as a single bay in front of the glazing. The bay covers most of the façade, bringing a depth and texture to its appearance, with the underlying unitised glazing exposed on the façade's margins and for the uppermost two floors, adding further visual interest. The screen is a clever device: Composed of terracotta horizontal and vertical fins it is arranged to provide solar shading to the offices and to direct outward views generally northwards and away from nearby residential buildings and Capital House, whilst maintaining good daylight penetration. Moreover, the green screen gives the elevation a distinct and engaging identity that contrasts well with the street facades, and sits well amongst the tree cover of the new pocket park. The use of terracotta is especially welcome, with its high quality ceramic finish providing a depth of colour and visual richness, albeit this should be confirmed by condition.
143. The east (Fenning Street) façade has a more closed character, reflecting the fact that it mainly contains the service core. Nonetheless, the façade is finished in the same high quality terracotta, in this instance comprising large, vertical cladding panels. The elevation is not without interest, however, with the panels

arranged in a staggered pattern, following the rise of the scissor-stairs, and in a stacked pattern for the landings. The panels are profiled with flared edges rather than set flush, bringing a subtle dynamic quality to the elevation, whilst tall slotted windows add further visual relief, as well as daylight to the service cores.

144. Overall, the elevational architecture is well conceived, expressing the building's component parts well and giving the building a clear and coherent identity that is more Southwark than corporate London, with its quasi-industrial character, richness of materials and engaging public feel.
145. Brief mention should be made of the functionality of the office accommodation. Positioning the core to one side rather than central creates the opportunity for large, uninterrupted open-plan offices, as well as supporting cellular layouts. The offices have floor to ceiling heights of 3.1m with a minimum of 2.9m (clear) with exposed services, making for generous and well-lit spaces when combined with the full-height window openings. The windows are openable, with the building featuring mixed-mode ventilation and solar shading where necessary. Whilst the main building structure comprises efficient post-tension concrete, part of the office floorplate is nonetheless constructed in steel and cross laminated timber (CLT).
146. This hybrid component provides further local flexibility in office layouts, with the opportunity for floors to become interconnected with additional staircases or double and triple-height spaces, allowing companies to tailor their floorplans, independent from the main core. In addition, every other floor features a large balcony, giving staff access to north facing river views and to extensive outdoor seating and planting; whilst the rooftop garden on the 24th floor is intended as a communal amenity space for all staff. Whilst the building includes offices at basement level, the offices nonetheless benefit from equally generous ceiling heights, and benefit from daylight and outlook, with large sunken garden lightwells, as well as from the ocular windows set within the new pocket park. Overall, the office accommodation is of a very high standard, with the development targeting a BREEAM Outstanding rating.

Tall buildings

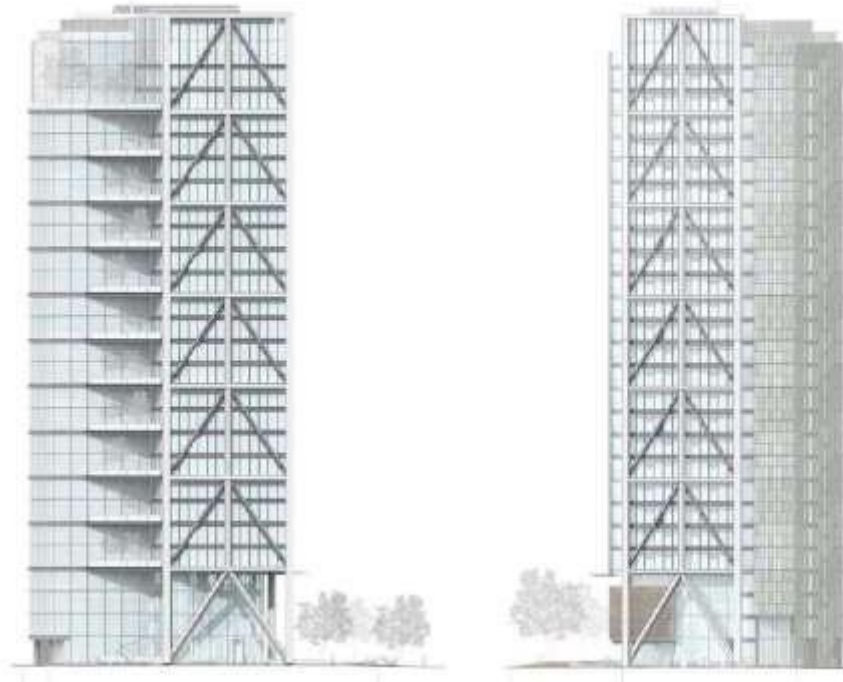
147. The building reaches a maximum height of approximately 113.66m above grade, and is significantly taller than its immediate surroundings to the south and east, which is characterised by buildings of between 12 and 20m in height. However, the contextual scale rises considerably towards Guy's Hospital and the Shard, and the site is located within the CAZ and the Opportunity Area, where such high-rise intensification of development is generally appropriate. Nevertheless, the tall building is expected to also comply with policy 3.20 in full. Looking at the requirements in turn:

Positive contribution to the landscape

148. The development includes additional public open space and a number of significant improvements to the public realm; most notably the new pocket park located to the west of the tall building. The pocket park provides a generous and attractive soft landscaped public area that would be in a prominent

position, opening directly onto St Thomas Street and enhancing the visual amenity of the street. The park would also open up an attractive, new pedestrian route through the site, connecting through to Melior Street.

North and south elevations



149. Elsewhere, the development sets back the tall building along St Thomas Street, allowing the provision of a generous new tree-lined pavement (subject to TfL approval) and additional boundary landscaping; whilst the building line cutback at the junction of Melior Street with Fenning Street provides replacement public gardens and new street trees, as well as facilitating a north-south pedestrian route that in time will connect through the masterplan area. Overall, the landscape contribution is commensurate with the scale of development.

Point of landmark significance

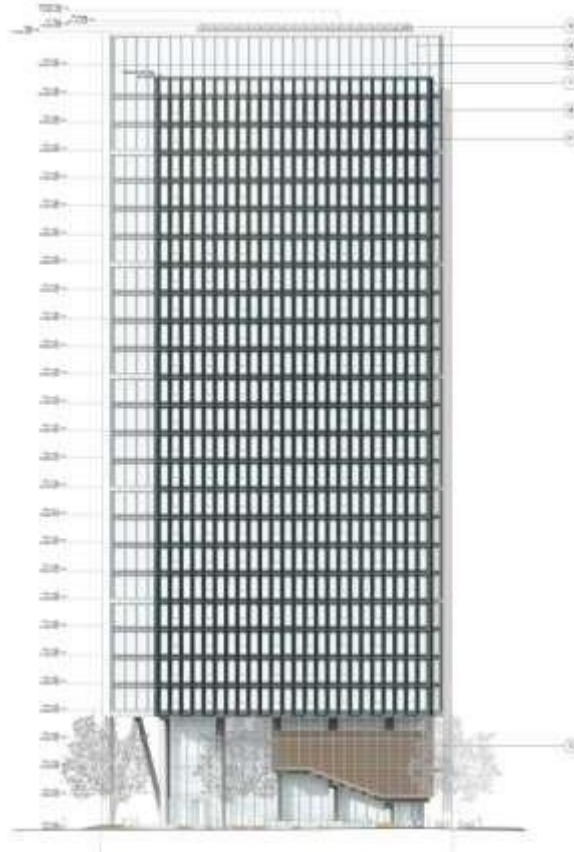
150. The application site sits directly opposite London Bridge Station, one of London's major transport interchanges and sits opposite one of the main entrances. Additionally, the site is located within the CAZ and within the immediate surroundings of other tall buildings (both existing and consented). As such the application site is considered to be appropriate for a tall building.

Highest architectural standard

151. This is an excellently designed tall office building, with its use of high performance material finishes, clever building orientation, massing and internal organisation, and high functional quality of its accommodation, with the building aimed at achieving the highest BREEAM rating and an exemplary standard of sustainability.
152. As set out earlier, the building is designed in three inter-related parts: the main office floorplate; the services core; and ancillary amenity space. The layout is well conceived to maintain the offices as an open, flexible space with excellent

daylighting and outlook; locates the core to a discrete section of the building adjacent to the servicing street; and provides river facing terraces with adaptable floorplates that can be customised to meet the occupiers' needs. This organisation is cleverly expressed in the external massing of the building, generating its distinctive character and elegant proportions.

Proposed west elevation



153. The offices floors benefit from excellent floor-to-ceiling heights and mixed-mode ventilation, as well as easy access to the terrace spaces. The building's base is well-conceived as a public space, with its perforate design, open access and relaxed fit-out making for an inclusive space that engages well with the public realm. Lastly, the architecture is highly sustainable in its use of post-tension concrete, CLT, high performance facades, green roofs and green building technology. Overall, the architecture is very well considered, effective and engaging.

Relates well to its surroundings

154. The tall building relates well to its immediate surroundings both in terms of the building's base and its general design. The building's base draws back from the general building line to strengthen its connection to the street and new pocket park. The open, permeable character of its ground floor, with its generous scale, the continuation of the high quality paving into the foyer area and extensive interior soft landscaping, make for a seamless transition between the public realm and publically accessible lobby, inviting people into the building. In addition, the building's café and public auditorium space work well with the pocket park to bring a more intimate, but public quality to the south side of the site relating well to the more local scale and character of Melior Street.

155. Its elevational architecture also relates well to its wider context, with the building's modern office aesthetic on the one hand reflecting the high quality, commercial character of London Bridge as a business district; and its structural detailing of expressed concrete framework and columns and steel bracing on the other hand reflecting the industrial overtones of the wider Bermondsey area and London Bridge Station itself.

Positive contribution to the London skyline

156. The building is intended to help consolidate the cluster of tall buildings within St Thomas Street and the wider London Bridge area. Its contribution is positive, with its elegant form, clear architectural identity and confident rooftop finish. It should play its part well in mediating the distinct changes in scale from the very tall buildings of the Shard and nearby Guy's Tower down towards the more mid-rise and domestic scales of Bermondsey. As set out above, it provides a comfortable step change in height down from the recently approved development of Capital House. Its articulated built form and slender design is engaging and brings a distinctive and pleasing appearance to the skyline.
157. Overall, the development's design readily meets the policy criteria for a new tall building. A significant outcome of a tall building is its visibility and whilst this is not considered harmful in itself, the potential effects on the 'receptor' townscape and heritage assets are of special concern and are considered further below.

Heritage and townscape

158. 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 paras 193-196 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 197 goes on to advise taking into account the effect of a scheme on the significance of a non-designated heritage asset.
159. The submission includes a Zone of Visual Influence map (ZVI) and a townscape visual impact assessment that provides verified images of the development when viewed from 44 locations in and around the London Bridge and Bermondsey areas, as well as when viewed within the relevant protected London panoramas and the setting of the Tower of London.
160. In general, the tall building is less widely visible than the height suggests. In part, this is because of other large buildings located mainly to the north and

west that often mask the development from wider view; but also because of the adjacent railway viaduct and tight, historical urban form to the south and east that offers limited visual prospects. Nonetheless, it does remain visible in a number of nearby and distant views where it affects the settings of designated heritage assets and the townscape. Looking at the categories of views and townscape in turn:

Impacts on Protected Views

161. The LVMF seeks to protect and manage 27 views across London and those of some of its major landmarks. The submission demonstrates that at the proposed height the development will be visible above the threshold plane and in close proximity to St Paul's Cathedral when viewed from Alexandra Palace (view #1) and Kenwood House (view #3) and immediately behind the cathedral's dome when seen from Parliament Hill (view #2). However, its scale and material finish are not visually disruptive and are generally lost against the backdrop of the Shard, with the cathedral's silhouette remaining clear and identifiable. In the views from Primrose Hill, Greenwich and Blackheath (views #4, 5 and 6), the change in perspective pushes the new building distinctly to one side of St Paul's, with the setting of the strategic landmark remaining unaffected. It is also notable that despite its height, the building remains below the ridgeline of the distant Surrey Hills, and that whilst the building partly obscures the Shard, this is at low level only, with the Shard's distinctive form remaining easily visible and its contribution to the skyline similarly unaffected.
162. Looking at the riverside prospects, the new building would form part of the London Bridge cluster of tall buildings. As such, it would be largely obscured from view in the protected view from Tower Bridge (view #7), with part of the upper floors emerging beyond the curved profile of City Hall. Nonetheless, the two buildings would appear of similar overall height and much the same as Guy's Tower, which is seen further to the right; whilst in the downstream view from Southwark Bridge (view #8), the new building is completely obscured from view by the new development in Shard Place. The proposal would have a neutral effect on the townscape in these views, which remains dominated by the river and the Shard.
163. In terms of the borough's protected views towards St Paul's, the building would be visible in the panorama from One Tree Hill (view #9), but would appear distinctly remote from the cathedral and as part of the tall buildings cluster around the Shard. The new building would not be visible in the narrow linear view of the cathedral from Nunhead Cemetery (view #10), being located to the right and obscured by intervening tree cover.
164. Overall, officers consider that the development has a neutral impact upon the protected view of St Paul's and little or no discernible impacts upon the protected London panoramas or the additional protected panoramas within Southwark.

Impacts on the World Heritage Site

165. The Tower of London is a heritage asset of the highest order. It is grade I statutory listed and certified as a World Heritage Site of Outstanding Universal

Value. As such any development that intrudes upon views within the Tower complex must be carefully considered, albeit with varied sensitivity depending on whether the development is visible from within the inner ward and close to the site of the scaffold, or is seen looking outwards from the ramparts.

166. For the most part the development would not be seen from within the Tower of London complex. Where it does become visible, its impact is modest and generally within the lesser sensitive parts of the World Heritage Site. However, it does appear briefly in the more sensitive views of the Queen's House from the White Tower (view #17) and from the Scaffold Site (view #18). From the entrance courtyard of the White Tower it would be glimpsed above the roofline of the Queen's House, although this would be through the trees and would be read as one of several tall buildings in the distance; whilst from the scaffold site it is just visible among the gables of the historic building's roof. In these views, whilst the sensitivity of the views is high, the visual intrusion is minor and the harm negligible.
167. The development has a modest impact on the wider setting of the Tower (views #11-15), where it is generally read as part of the backdrop of tall buildings that cluster around the London Bridge area, and as such has a neutral effect on the heritage environment. It is notable that to date Historic England has made no reference to any impacts of the development on the WHS in its consultation response.

Impacts on local heritage assets - conservation areas and listed buildings

168. The application site is outside, but adjacent to the Bermondsey Street conservation area, which has the Grade II* listed Church of St Mary Magdalen and the village-like high street as its focus, but extends westwards to include the south side of Melior Street, a short return onto Fenning Street and Melior Place. It therefore includes the neighbouring Church of Our Lady of Salette and St Joseph and the Horseshoe Public House and several Victorian workshop buildings (incl. no.9 Fenning Street), which are regarded as positive contributors to the local townscape. The local area also includes a number of listed buildings, the closest to the site being the Grade II listed railway viaduct opposite the site.
169. The special interest of the Bermondsey Street conservation area is its historic development of tightly packed 18th century housing, many with shops, and late 19th/ early 20th century warehouses and workshops that have adopted the medieval pattern of narrow streets and plots, arched alleyways and rear yards. The tight urban scale, simple classical architecture and industrial detailing create an evocative and characterful townscape. The townscape impact analysis demonstrates that the scheme is likely to be seen from a number of vantage points around the Bermondsey Street conservation area and within the settings of a number of listed buildings, albeit the overall extent and degree of visibility are moderate.
170. It is notable that the view from St Mary's Churchyard (view #25), the building will be seen distinctly above the generally consistent roof heights surrounding the churchyard and would interfere in reading the nave and gable end to the church. This, however, is little different from the impacts of Guy's Tower and

the Shard, and as such the harm caused by the additional appearance of the development in this view would be minor.

View Bermondsey Street



171. When viewed from along Bermondsey Street (views #36 and 37), the proposed building's rooftop would be glimpsed among the dormers and mansards of the foreground buildings, with the Shard particularly present in the background. The new building becomes more obvious, however, from Tanner Street park on the corner of Bermondsey Street/ Tanner Street (view #35), where the townscape opens up and the new building is an overt addition to the skyline, catching the eye along with Guy's Tower and the Shard. The development would be seen to sit in front of the Shard, partially obscuring the main body of the building. However, this view of the Shard is not of heritage significance and in time the Shard's silhouette would be partly obscured behind the consented Capital House scheme.
172. In this and several other instances (views #38-42), the new building is visible, but it does not especially compromise the townscape experience. Any harm experienced is less than substantial, having minor impacts. The new tall building is an overt addition to the skyline when seen from Leathermarket Gardens, but again would be seen alongside Guy's Tower and the Shard (views #38 and #40). It would present an isolated tall building in the backdrop to the view along Weston Street (view #39), though it would remain sufficiently distant from the Grade II listed Leathermarket building and would in time be joined by the consented Capital House.
173. The exception is within Kirby Grove (view #41), where its appearance would be more emphatic, rising above the Guinness Trust buildings towards the junction with Snowfields. Its high-rise form and material finishes would contrast strongly with the estate's terraced block form and red brickwork, detracting from the linear, residential character of the street. However, the Capital House scheme would have a similar effect. The harm remains less than substantial, with a moderate impact.
174. Not illustrated is the likely effect on the setting of the conservation area

immediately adjacent to the site. The layout of the site and the inclusion of the garden square will open up views of Melior Street from St Thomas Street and provide an attractive vista of the Church of Our Lady of Salette and St Joseph, which is of moderate benefit. Furthermore, whilst the building's west corner is brought down onto Melior Street, it would be as a double-height columns with the floorplate recessed on ground and first floor levels; and with the main bulk of the building drawn in at an angle and the pocket park provided onto the street. This layout would provide a sense of openness at the rear as well as retain the eastwards view along Melior Street from the junction with Weston Street. The associated re-landscaping of the corner space, the new pedestrian route and pocket park would improve this part of the local conservation area, enhancing access and the vista towards the Horsehoe Pub and neighbouring warehouses at the junction with Fenning Street and Melior Place. This too would be of moderate benefit.

175. The new development has minor effects on other surrounding conservation areas and listed buildings, the more sensitive views being the churchyard of the Grade I Southwark Cathedral in Cathedral Street (view #29); the view along Borough High Street towards the Grade II* St George the Martyr (view #22); within Merrick Square with its Grade II terraces; the Grade II terraces of Bedale Street (view #30); and the more overt views from Tooley Street looking towards the Grade II viaduct (views #27 and 28). In these views the new building is often read as one of several tall buildings affecting the view, and its additional impacts are neutral or of negligible harm.

Conclusion on heritage

176. The development is discernible within the backdrops to the Tower of London and is visible within several of the protected panoramas. However, its appearance causes no or negligible harm, preserving these sensitive views. The tall building is more evident from within those conservation areas and listed building settings closer-by, though for the most part it is read as one of several similar tall buildings and as such the harm caused to the settings is negligible. It does have more of an impact on the west and southwest parts of the Bermondsey Street conservation area and within Kirby Street in particular, where its appearance is more emphatic, though the harm caused would be remain less than substantial. However, the development would better reveal views of Melior Street, enhancing this part of the conservation area. In other nearby conservation areas, the impact is negligible.
177. Overall, whilst the development causes harm in some instances that harm is primarily to parts of the Bermondsey Street conservation area and would be at the lower order of less than substantial. The character and appearance of the conservation area as the heritage asset would be sufficiently preserved. As set out in para 196 of the NPPF, where there is less than substantial harm, this should be weighed against the public benefits that arise from the scheme. These benefits include the high quality architecture, new pedestrian-routes, improved public realm, pocket park, significant employment creation and the provision of affordable workspace.

Impacts on the townscape outside of conservation areas

178. The submission includes several views from the general area that are outside the local conservation areas, showing the development within the general townscape. Where the tall building is seen, the views tend to show it within a fragmented townscape with groups of buildings of varied scale and architecture. The development is read as part of this varied townscape or part of the backdrop of large scaled buildings within the London Bridge area, and therefore has a modest impact (views #31, 32, 33 and 43). In the instance of the eastwards view along Crucifix Lane, the new building would take the place of Guy's Tower, with its more composed and articulated west elevation offering a more engaging focal point to the view, albeit of a slightly taller building in these perspectives. The effect is modestly beneficial.

Design Review Panel

179. The proposals were reviewed by the Council's DRP at the pre-application stage in December 2019. The scheme was presented within the context of the wider development framework, which the panel has generally endorsed when assessing previous proposals for this and neighbouring sites.
180. The DRP was comfortable with the general scale and design approach for the new building. It found the massing strategy convincing and thought that the general layout worked really well, particularly in opening up the view through to the church and interface with the new gardens. However, it advised further consideration of the layout onto Melior Street, where the proposed building line caused a pinch-point onto the street. It also expressed concern regarding the extensive basements and how this would affect the long-term viability of the landscaping. The panel supported the concept of the public foyer, but thought this needed further exploration to ensure its delivery as a lively, engaging space. It suggested the architectural expression needed greater coherency. Lastly, it supported the scheme's ambition to be a highly sustainable building, but wanted this widened to consider other non-technical aspects.
181. The scheme architects responded positively to the DRP comments and adjustments have been made to the scheme, which have been to the officers' satisfaction. They include drawing back the south building line onto Melior Street to relieve the pinch-point; increasing soil depth for planting through a combination of raised planters and revisions to the basement footprint, allowing more trees to be planted directly into ground. The detailing of the terracotta screening has been progressed, as has the detailed layout of the public foyer.

Landscaping, trees and urban greening

182. As referenced above, the scheme includes a number of public realm benefits, including the potential for a tree lined pavement on St Thomas Street (subject to TfL approval) that is widened by the four-storey undercroft, supporting its function as the main local thoroughfare; and most notably the new pocket park, which makes for an attractive, permeable public space. The proposed pocket park would be a suitable and high quality replacement for the existing Melior Street Garden which is classed as Other Open Space within the New Southwark Plan. The pocket park would create new open space and landscaped areas which would be attractive and well planted, assisting the

development to achieve an Urban Greening Factor of 0.3 which meets the requirement set out in the London Plan 2021.

New park



183. The hard landscaping throughout comprises high quality materials, with coarse grained granite paving onto St Thomas Street to match the streetscape outside the refurbished London bridge Station; natural stone paving onto Melior Street; and recycled brick for the footways within the site. The pocket park has a contemporary design, with planters arranged to provide a series of smaller landscaped spaces and informal terraced seating; whilst the smaller, corner pocket park at the junction of Melior Street/ Fenning Street provides a small plaza. The new trees along St Thomas Street, Fenning Street and Melior Street are planted at grade, which is welcome in maintaining the natural topography; although elsewhere within the scheme others are contained within planters that are raised above the basement slab, which is less effective, but occasional and provides opportunities for outdoor seating..
184. The palette is high quality, although the landscaping (including perimeter footway materials, tree species, planting and street furniture) should be conditioned to confirm this and to ensure a wider seamless public realm that avoids a corporate feel. This should include a requirement for new public art which will add to the sense of place.
185. Lastly, the new landscaping extends to include balcony and roof terraces, which incorporate raised planters and provide greenery on every other floor of the building and a green 'fringe' above the building's parapet. The terraces provide good amenity for the offices, as well as softening the roof profile. Overall, the landscaping is high quality and commensurate with the scale of

development both in terms of its extent and quality of finishes.

Conclusions on design

186. The application is for a new tall building of 27 storeys on a site within the Central Activities Zone and adjacent to London Bridge Station. The site is outside, but adjacent to the Bermondsey Street conservation area, and is within the vicinity of a number of other heritage assets, including the Grade II railway viaduct. It replaces an existing 7-storey office building that dates from the late 1970s, but is of no architectural or townscape merit. The development is of a high architectural quality and with significant urban design benefits.
187. The proposed site layout and building footprint are well-conceived, presenting an engaging built form and positioning the building to allow a new pedestrian route through the site and extended and improved public garden spaces that present onto St Thomas Street and opens up an attractive view through to the Roman Catholic church in Melior Street. The public realm is well-activated, with the base of the building designed to be perforate and flowing with the adjacent public realm, and providing a welcoming public foyer space.
188. The tall building is within an appropriate location for high rise development. Its scale is generally well judged, with its height responding to the emerging cluster of tall buildings within the London Bridge area and mediating the change in height downwards towards Bermondsey Street as part of the informal St Thomas Street masterplan. The proposed height does not interfere in the protected strategic and borough views of St Paul's, and whilst seen within the riverside panoramas it would be read as part of the London Bridge cluster, with its slender form evident and the primacy and iconic quality of the Shard as a landmark building maintained. The development would also be seen from the Tower of London, where the impact would be minor and not dissimilar in impact to other background tall buildings.
189. More locally, the building will affect the settings of local heritage assets, being visible above the local roofscapes or breaking the skyline, albeit for the most part its appearance is moderate and has a negligible or minor effect. It sits comfortably with the adjacent Grade II listed railway arches, but will be distinctly evident in more open views within the Bermondsey Street and surrounding conservation areas.
190. The proposed architecture is engaging and high quality in its massing, elevational detailing and functional qualities. Its articulated form is clever, presenting a slender, elegant profile and an interesting architecture that works well in the round. It also supports flexible and adaptable floorplates with good office amenities. The design is confident in its appearance, with its expressed structural framework and steel bracing providing a robust city-facing character, with its terracotta screening providing a softer, richer local character that works well within the new garden square. The material finishes are high quality, whilst the construction and operation of the building are welcome in their approach to sustainability.
191. Lastly, the scheme provides significant improvements to the public realm,

including new public open space and new pedestrian routes through to Melior Street, as well as connecting across to the neighbouring Vinegar Yard site. The re-orientated and re-landscaped pocket park is proportional and commensurate with the large scale of development, and an important enhancement to the local area. The gardens bring welcome visual and physical amenity to St Thomas Street and to the setting of the conservation area in particular.

Ecology and biodiversity

192. 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

193. The site lies at an exceptionally interesting location within the 'Borough, Bermondsey and Rivers' Archaeological Priority Zone (APZ) and is extremely sensitive for archaeological matters. When the New Southwark Plan is adopted the site will lie within the newly extended 'North Southwark and Roman Roads ' Archaeological Priority Area (APA). Saved Policy 3.19 of the Southwark Plan (2007) requires that proposals for development in APZ/As should be accompanied by an archaeological desk-based assessment (DBA) and an evaluation report (the results of digging archaeological trial trenches).
194. The applicants have submitted a desk based assessment and environmental statement which is included within the ES at appendix 7 and reviewed within Chapter 12 of the main ES report and this details the impacts of the proposal upon buried archaeological remains as well as an assessment of previous impacts. These documents provide a suitable baseline which adequately summarises the archaeology present on site.
195. The archaeological desk based assessment demonstrates that remains of international and national significance that would require preservation in-situ are not expected within the site study area. It is concluded that the site has the potential to contain archaeological heritage of local and county importance only.
196. The ES states that any impacts and effects to archaeological remains would occur during the construction works and excavation of the basement and that these impacts would be permanent. The site has the potential to include archaeological remains from different periods including paleo-environmental remains, later medieval land reclamation remains, early post-medieval industrial remains, early post-medieval reclamation remains and post-medieval building remains.
197. Mitigation measures suggested in the environmental statement include archaeological evaluation and geo-archaeological works, and monitoring of

geotechnical investigations. This represents a suitable first stage for works and subsequent to these results conditions are recommended to secure the archaeological interests of the site. These include conditions for foundation and basement design, evaluation, mitigation works and a condition to secure the final report, archive and publication of the archaeological results. These conditions will ensure that adverse impacts are reduced as far as possible and that no significant effects will occur as a result of the proposed development.

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

198. 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.
199. A development of the size and scale proposed will clearly have potential significant impacts on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site. The proposal has required an EIA in order to ascertain the likely associated environmental impacts and how these impacts can be mitigated. The accompanying Environmental Statement (ES) and addendum deals with the substantive environmental issues. An assessment then needs to be made as to whether the residual impacts, following mitigation, would amount to such significant harm as to justify the refusal of planning permission.

Outlook and privacy

200. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. The closest neighbours are those dwellings on the opposite side of Melior Street. The design of the proposed building is such that there is a single closest point between the proposed building and the adjacent neighbours with the proposed building stepping away as it moves east. At the closest point measured on the proposed ground floor plan, the separation distance would be 14.7 metres.

Daylight

201. A daylight and sunlight report has been submitted as part of the Environmental Statement. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
202. 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. This area south of St Thomas Street and the redeveloped London Bridge Station has been identified as an area where tall buildings are appropriate and there are existing tall buildings in the area such as the Shard and Guys Hospital Tower which are in close proximity to the site as well as the consented scheme at Capital House which is the immediate neighbour to the west.

203. 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. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of their original value before the loss is noticeable. In terms of the ES, the level of impact on loss of VSC is quantified as follows;

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

204. 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

205. The ES considers the effects on the following neighbouring buildings:

- 48-50 Weston Street/16 Melior Street
- Our Lady of La Salette and Saint Joseph Church/14 Melior Street
- 6-12 Melior Street/36 Snowsfields
- 2-4 Melior Place
- 37 Snowsfields
- 38 Snowsfields
- 39 Snowsfields
- 40 Snowsfields
- 41 Snowsfields
- 42 Snowsfields
- 43 Snowsfields
- 64-66 Weston Street
- 62 Weston Street
- 52-54 Weston Street
- Wolfson House, 49 Weston Street

- 115-122 Snowsfields
- The Rose Public House, 123 Snowsfields
- 115-144 Guinness Court
- 103-114 Guinness Court
- 1-15 Guinness Court
- 8-20 Snowsfields
- The Horseshoe Inn
- 147 Snowsfields, Raquel Court
- More Cooper House, 14 Magdalen Street

206. The Rose public house, 103-114 Guinness Court, 147 Snowsfields/Raquel Court and More Cooper House/14 Magdalen Street would all remain fully compliant with the BRE in terms of both VSC and NSL and will not be considered further in the report. The tables below outline the general results in terms of the loss of VSC and NSL that would be experienced by the remaining buildings and a more localised assessment of the affected properties is detailed below;

Table – Impact of proposed development on Vertical Sky Component (VSC) including cumulative results (*)

Property	No. of windows tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of up to 30% reduction in VSC	No. with moderate adverse impact of between 30%-40% reduction in VSC	No. with major adverse impact of over 40% reduction in VSC
48-50 Weston Street/16 Melior Street	66	18 (18)	0 (6)	0 (0)	48 (42)
Our Lady of La Salette and Saint Joseph Church/14 Melior Street	3	0 (0)	0 (0)	0 (0)	3 (3)
6-12 Melior Street/36 Snowsfields	135	68 (65)	6 (10)	12 (14)	49 (46)
2-4 Melior Place	16 (35)	12 (21)	3 (14)	1 (0)	0 (0)
37 Snowsfields	7	7 (7)	0 (0)	0 (0)	0 (0)
38 Snowsfields	5	0 (0)	2 (0)	3 (5)	0 (0)
39 Snowsfields	18	6 (5)	8 (2)	4 (10)	0 (1)

40 Snowsfields	18	11 (10)	5 (4)	2 (3)	0 (1)
41 Snowsfields	13	9 (9)	1 (1)	3 (1)	0 (2)
42 Snowsfields	13	13 (13)	0 (0)	0 (0)	0 (0)
43 Snowsfields	6	0 (0)	1 (0)	3 (2)	2 (4)
64-66 Weston Street	12	11 (11)	1 (1)	0 (0)	0 (0)
62 Weston Street	13	1 (1)	11 (4)	1 (8)	0 (0)
52-54 Weston Street	13	5 (5)	1 (1)	4 (3)	3 (4)
Wolfson House, 49 Weston Street	165	123 (146)	27 (19)	15 (0)	0 (0)
115-122 Snowsfields	34	34 (34)	0 (0)	0 (0)	0 (0)
The Rose Public House, 123 Snowsfields	14	14 (14)	0 (0)	0 (0)	0 (0)
115-144 Guinness Court	53	53 (51)	0 (2)	0 (0)	0 (0)
103-114 Guinness Court	23	23 (23)	0 (0)	0 (0)	0 (0)
1-15 Guinness Court	23	23 (23)	0 (0)	0 (0)	0 (0)
8-20 Snowsfields	58	29 (42)	22 (16)	7 (0)	0 (0)
The Horseshoe Inn	6	2 (2)	4 (4)	0 (0)	0 (0)
147 Snowsfields, Raquel Court	83	83 (83)	0 (0)	0 (0)	0 (0)
More Cooper House, 14 Magdalen Street	56	56 (56)	0 (0)	0 (0)	0 (0)
Total	853 (872)	601 (639)	92 (84)	55 (46)	105 (103)

Table – Impact of proposed development on Daylight Distribution / No Sky Line (NSL) including cumulative results (*)

Property	No. of rooms tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of up to 29.9% reduction in NSL	No. with moderate adverse impact of between 30%-39.9% reduction in NSL	No. with major adverse impact of over 40% reduction in NSL
48-50 Weston Street/16 Melior Street	18	13 (7)	5 (0)	0 (0)	0 (11)
Our Lady of La Salette and Saint Joseph Church/14 Melior Street	2	0 (0)	1 (0)	0 (1)	1 (1)
6-12 Melior Street/36 Snowfields	59	37 (36)	5 (5)	4 (5)	13 (13)
2-4 Melior Place	3 (14)	3 (14)	0 (0)	0 (0)	0 (0)
37 Snowfields	2	2 (2)	0 (0)	0 (0)	0 (0)
38 Snowfields	5	5 (5)	0 (0)	0 (0)	0 (0)
39 Snowfields	14	13 (13)	0 (0)	1 (1)	0 (0)
40 Snowfields	14	12 (12)	2 (2)	0 (0)	0 (0)
41 Snowfields	13	11 (11)	2 (2)	0 (0)	0 (0)
42 Snowfields	13	13 (13)	0 (0)	0 (0)	0 (0)
43 Snowfields	6	5 (5)	0 (0)	0 (0)	1 (1)

64-66 Weston Street	12	12 (12)	0 (0)	0 (0)	0 (0)
62 Weston Street	12	7 (7)	3 (3)	2 (2)	0 (0)
52-54 Weston Street	8	6 (6)	1 (1)	1 (1)	0 (1)
Wolfson House, 49 Weston Street	135	133 (135)	2 (0)	0 (0)	0 (0)
115-122 Snowsfields	10	9 (7)	1 (2)	0 (0)	0 (1)
The Rose Public House, 123 Snowsfields	6	6 (6)	0 (0)	0 (0)	0 (0)
115-144 Guinness Court	37	33 (33)	2 (2)	2 (2)	0 (0)
103-114 Guinness Court	15	15 (15)	0 (0)	0 (0)	0 (0)
1-15 Guinness Court	15	14 (10)	1 (5)	0 (0)	0 (0)
8-20 Snowsfields	51	46 (43)	2 (6)	2 (1)	1 (1)
The Horseshoe Inn	4	2 (4)	2 (0)	0 (0)	0 (0)
147 Snowsfields, Raquel Court	30	30 (30)	0 (0)	0 (0)	0 (0)
More Cooper House, 14 Magdalen Street	34	34 (34)	0 (0)	0 (0)	0 (0)
Total	518 (529)	461 (460)	29 (28)	12 (13)	16 (28)

48-50 Weston Street/16 Melior Street

207. A total of 66 windows serving 18 rooms have been assessed at this property for VSC and NSL respectively. 18 of the assessed windows would remain compliant with the BRE guidance in terms of VSC. The remaining 48 windows would see reductions in VSC of more than 40% which is considered to be a major reduction.
208. Of the 48 affected windows, 30 serve bedrooms and the remaining 18 serve living spaces (LKD). The 30 bedroom windows serve a total of 12 bedrooms, of which seven would remain compliant with the BRE in terms of NSL. The remaining five bedrooms would see minor reductions in NSL of between 23% and 27% which is considered acceptable given that bedrooms are less sensitive to reductions in light.
209. The 18 LKD windows that would see major VSC reductions serve a total of six LKD's. Each LKD is served by six windows and in the case of each LKD, three of these windows would remain fully compliant with the BRE in terms of VSC. It should also be noted that each LKD would remain fully compliant with the BRE in terms of NSL. Whilst the effect on this property is considered to be moderate adverse (and as such significant) the overall impact is considered acceptable given the central London location, the principal use of the most affected rooms as bedrooms and the fact that the living spaces would retain windows unaffected in terms of VSC and full compliance with NSL.

Our Lady of La Salette and St Joseph Church/ 14 Melior Street

210. A total of three windows serving two rooms have been assessed at this property. All three windows would see reductions in VSC of more than 40% which is considered to be a major reduction. Two of the windows serve a living room and the remaining window serves a bedroom. The living room would retain 78% NSL which is only 2% less than the BRE standard of 80% and represents a minor loss. The bedroom would see a greater reduction in NSL of 55% however the BRE accepts that bedrooms are less sensitive to reductions in daylight. Overall, whilst the effects on this property would be considered major adverse, they are considered acceptable given the context of the site and the fact that the living space would only marginally fall below the BRE standards of NSL.

6-12 Melior Street

211. A total of 135 windows serving 59 rooms have been assessed at this property in terms of VSC and NSL respectively. With regards to VSC, 68 of the 135 windows would remain compliant with the BRE. The remaining 67 windows can be broken down as 39 bedroom windows serving 22 bedrooms and 28 LKD windows serving 23 LKD's.
212. The 39 bedroom windows serve 22 bedrooms. Of these 22 bedrooms, 14 would benefit from windows that would remain compliant with the BRE in terms of VSC. The remaining eight bedrooms would experience varying levels of impacts with three bedrooms retaining VSC levels of between 10.8% and 11.9%, two with VSC levels of 12.3% and 15.6% and the remaining three windows all with VSC levels in excess of 22%.

213. The 28 LKD windows that would see reductions in VSC would serve 23 LKD's. 22 of these LKD's would benefit from windows that would remain fully compliant with the BRE in terms of VSC. The remaining LKD would see a reduction in VSC of 21% which is only 1% beyond the 20% considered noticeable by the BRE. Furthermore, it should be noted that this LKD would retain BRE compliant NSL and a VSC of 25.9% which is considered good for an urban area. It is noted that the one LKD that would see a reduction in NSL beyond the BRE guidance would retain 100% VSC at one of the additional windows serving it. The effect on this property is concluded as moderate to major in the ES. Overall, the impact is considered acceptable given the central London location, the principal use of the most affected rooms as bedrooms and the fact that the living spaces would retain windows unaffected in terms of VSC and with good compliance with NSL.

2-4 Melior Place

214. A total of 16 windows serving three rooms have been assessed for VSC and NSL at this property respectively. All three rooms assessed for NSL would remain fully compliant with the BRE guidance as would 12 of the 16 windows assessed for VSC.
215. Three of the four windows that would see reductions in VSC beyond the BRE guidance would see proportional reductions of 21%-30% which would be categorised as minor and the remaining window would see a reduction of 34% which would be considered a moderate loss. In all cases the affected windows serve rooms that are served by additional windows that would remain unaffected in terms of VSC. The effect on this property is therefore considered to be minor and acceptable given the high level of compliance.

38 Snowfields

216. Five windows serving five rooms have been reviewed for VSC and NSL. Whilst it is noted that all windows assessed would see losses of VSC in excess of the BRE standards, these losses are minor (three windows) and moderate (two windows) and all serve rooms that would remain fully compliant in terms of NSL. Overall the effect of the proposed development on this property would be minor and acceptable given the fact that there would be no major losses alongside full NSL compliance.

39 Snowfields

217. A total of 18 windows have been assessed for VSC at this property and six would remain compliant with the BRE. The remaining 12 windows would see reductions beyond the BRE with eight windows seeing minor reductions of between 25% and 29% and four windows with reductions of between 33% and 37% which would be considered a moderate loss.
218. NSL has been assessed for 14 rooms and all rooms bar one would remain fully compliant with the BRE. The one room that would see losses beyond the BRE would experience a moderate loss of 38%. Therefore, whilst there would be 12 windows affected in terms of VSC in all but one case these windows would serve rooms that would remain compliant NSL. The overall effect on this

property is categorised as minor and acceptable given that there would be a high level of NSL compliance and no major VSC losses.

40 Snowfields

219. A total of 18 windows have been reviewed for VSC at this property and 11 would remain fully compliant with the BRE. The remaining seven windows would see reductions in excess of 20% with five windows expected to experience minor reductions of between 20% and 28% and two windows with moderate reductions of between 30% and 32%.
220. Of the 14 rooms assessed for NSL, 12 would remain compliant with the BRE. The two affected rooms would both see minor reductions in NSL of 24%. The overall effect on this property is categorised as minor and acceptable given that there would be a high level of NSL compliance and no major VSC losses.

41 Snowfields

221. At 41 Snowfields, 13 windows have been assessed for VSC and whilst nine would remain fully compliant with the BRE, one window would see a minor reduction in VSC of 21% and three windows would see moderate reductions in VSC of between 32% and 39%. A total of 13 rooms have been assessed for NSL and 11 would remain compliant with the BRE. The two rooms that would see NSL reduction would experience minor losses of between 25% and 26%. The overall effect on this property is considered to be minor.

43 Snowfields

222. At 43 Snowfields, six windows serving six rooms have been assessed for VSC and NSL. All of the assessed windows would see reductions in VSC beyond the BRE guidance and this would include one window with a minor reduction of 28%, three windows with moderate reductions of between 33% and 39% and finally, two windows with major reductions of 41% and 45%.
223. These six windows serve six rooms that will, in all but one case, remain fully compliant with the BRE in terms of NSL. The one room that would see a reduction in NSL beyond the BRE would experience a major loss of 53% and whilst the window serving this room would see a reduction in VSC, the actual real terms reduction in VSC would be just 3.5%. The effect on this property would be moderate.

64-66 Weston Street

224. A total of 12 windows have been assessed for VSC at this property and 11 would remain BRE compliant. The single window that would not comply with the BRE in terms of VSC would experience a minor reduction of 25% and would serve a room that would remain fully compliant in terms of NSL by retaining 85% daylight distribution. It should be noted that all rooms assessed for NSL would remain compliant with the BRE. The effect on this property is therefore considered to be negligible.

62 Weston Street

225. At 62 Weston Street 13 windows serving 12 rooms have been assessed for VSC and NSL. Whilst 12 of the 13 windows assessed for VSC would see losses beyond the 20% set out in the BRE, 11 of the windows would see minor losses of between 21% and 29% and the remaining window would see a moderate loss of 32%. As such there would be no major VSC losses
226. In terms of NSL, seven of the 12 rooms assessed would remain compliant with the BRE guidance. Of the five rooms that would see NSL reductions beyond the BRE guidance, three would see minor reductions of between 21% and 29% and the remaining two rooms would see moderate reductions of 36%. The overall effect on this property is considered to be minor.

52-54 Weston Street

227. A total of 13 windows have been assessed for VSC at this property and five would remain compliant with the BRE. Of the remaining seven windows, one would experience a minor reduction in VSC of 26% however it would serve a room that would remain fully compliant in terms of NSL.
228. Four windows would see moderate reductions in VSC of between 31% and 38%, three of which would retain VSC levels in excess of 20% which is positive for an urban area and the remaining window would serve a bedroom which is considered to be less sensitive to daylight effects.
229. The remaining three windows would experience major VSC losses of between 41% and 47%. Two of these windows serve bedrooms which are recognised as being less sensitive to daylight effects and in any event would remain fully compliant in terms of NSL. The remaining window would be situated in a room that would benefit from windows that would remain fully compliant in terms of VSC by retaining VSC levels in excess of 27%. This room would also remain fully compliant in terms of NSL. The overall effect on this property is therefore considered to be minor.

Wolfson House

230. A total of 165 windows have been assessed for VSC at this property and 123 would remain fully compliant with the BRE. Of the 42 windows that would see VSC reductions, 27 would experience minor reductions of between 21% and 30% and 15 would experience moderate reductions of between 31% and 33%. All windows that would see reductions in VSC beyond the BRE guidance would serve rooms that would remain fully compliant in terms of NSL.
231. Indeed only two of the 135 rooms assessed for NSL would see reductions beyond the BRE standards and in both cases the reductions would be minor (20% -22%) and both rooms would benefit from windows with compliant VSC levels. The effect on this property is therefore considered to be minor.

115-122 Snowfields

232. All 34 windows assessed for VSC at this property would remain fully compliant

with the BRE guidance. In terms of NSL, one of the 10 rooms assessed would experience a minor reduction of 28% however the affected room would benefit from VSC compliant windows. The overall effect of the development on this property is therefore considered negligible.

115-144 Guinness Court

233. A total of 53 windows have been assessed for VSC at this property and all of them would remain compliant with the BRE. A total of 37 rooms were assessed for NSL and 33 would remain compliant with the BRE. Of the four that would see NSL reductions beyond the BRE threshold two would experience minor reductions of 24% and 29% and two would see moderate reductions of 30% and 31%. In all cases the affected rooms would benefit from VSC compliant windows and as such the overall effect is considered to be negligible.

1-15 Guinness Court

234. The 23 windows assessed for VSC at this property would remain fully compliant with the BRE. A total of 15 rooms have been assessed for NSL and whilst 14 would remain compliant with the BRE one would experience a minor reduction of 20.3% which is very marginally over the 20% specified by the BRE. The overall effect on this property is negligible.

8-20 Snowfields

235. A total of 58 windows have been assessed for VSC at this property and 29 would remain compliant with the BRE. The remaining 29 windows would see reductions in VSC in excess of 20% with 22 windows seeing minor reductions of between 20% - 30% and seven windows seeing moderate reductions of between 30% - 40%.
236. In terms of NSL, 51 rooms have been assessed and 46 would continue to receive BRE compliant daylight distribution. The rooms that would experience NSL losses beyond the BRE threshold can be broken down as follows.
237. Two rooms would experience minor reductions of 22% and 28% and both of these rooms would benefit from windows that would each retain at least 23% VSC which is positive for such an urban area. Two rooms would see moderate reductions in NSL with losses of 34% in both cases and whilst these rooms would be served by windows that would experience losses of VSC, the actual real terms VSC reductions would be just 2.1% and 2.5%.
238. The remaining affected room would experience a major loss of NSL of 50%. It should be noted that this room would have a window that would experience a minor loss of VSC of 28% which would equate to a real terms VSC loss of just 2.7%. Overall the effect of the development on this property would be minor.

The Horseshoe Inn

239. Six windows have been assessed at this property in terms of VSC. Two of the windows would remain compliant with the BRE whilst four windows would experience minor losses of between 26% and 28%. Two of these windows

would serve a room that would benefit from an additional window that would remain unaffected in terms of VSC as well as the room itself retaining 98% NSL which would comply with the BRE.

240. The remaining two windows would serve rooms that would also experience minor NSL reductions (23% and 25%) however these reductions are minor and are acceptable in the context of the retained VSC levels of at least 18%. The development would therefore have a minor effect on this property.

Cumulative daylight impacts

241. The applicant has considered the cumulative daylight effects of the proposed development. A scenario has been tested that reviews the effect of the proposed development alongside other consented schemes on nearby affected properties. The Rose public house, 103-114 Guinness Court, 147 Snowfields/Raquel Court, 37 Snowfields, 42 Snowfields and More Cooper House/14 Magdalen Street would all remain fully compliant with the BRE in terms of both VSC and NSL and will not be considered further in the cumulative scenario. As before, the daylight assessment considered windows and rooms within the vicinity of the site with the daylight effects summarised below:

48-50 Weston Street/16 Melior Street

242. As part of the cumulative scenario 66 windows have been assessed for VSC impacts and 18 windows would remain fully compliant with the BRE which is the same as under the existing versus proposed scenario. 48 windows would experience reductions in VSC that would be categorised as noticeable under the BRE guidance. Six of the affected windows would have minor reductions of between 20% - 30% and the remaining 42 windows would see major reductions in excess of 40%.
243. In terms of NSL, 18 rooms have been tested and seven would continue to achieve BRE compliant NSL. The remaining 11 rooms would see reductions in NSL in excess of 40% which would be categorised as major. All 11 affected rooms would be bedrooms which the BRE recognises as being less sensitive to daylight effects.
244. As mentioned previously there would be 48 windows that would experience noticeable loss of VSC. A total of 30 of these windows would serve 11 bedrooms and whilst it is noted that the VSC losses would be major (in excess of 40%), four of the 11 bedrooms would benefit from windows retaining at least 16% VSC which is acceptable given their use as bedrooms in addition to the urban nature of the locality.
245. The remaining 18 windows that would experience noticeable losses of VSC serve living spaces. Six of the 18 windows would experience minor reductions in VSC and the remaining 12 would experience major reductions in VSC. The 18 windows referred to would serve a total of six living spaces. Each of these living spaces is served by a total of six windows and in each case, three of these windows would remain compliant with the BRE in terms of VSC. It should also be noted that all six of these living spaces would remain fully compliant in terms of NSL. As with the existing versus proposed scenario, whilst the effect

on this property is considered to be moderate adverse (and as such significant) the overall impact is considered acceptable given the central London location, the principal use of the most affected rooms as bedrooms and the fact that each of the living spaces would retain windows unaffected in terms of VSC alongside full compliance with NSL.

Our Lady of La Salette and Saint Joseph Church/14 Melior Street

246. A total of three windows serving two rooms have been assessed at this property. All three windows would see reductions in VSC of more than 40% which is considered to be a major reduction. Two of the windows serve a living room and the remaining window serves a bedroom. The living room would retain 69% NSL which would represent a moderate loss. The bedroom would see a greater reduction in NSL of 67%, however the BRE accepts that bedrooms are less sensitive to reductions in daylight. Overall, the effects on this property would be considered major adverse and comparable to the existing versus proposed scenario. The effects are considered acceptable given the context of the site and the fact that the living space would only experience moderate reductions in NSL.

6-12 Melior Street

247. A total of 135 windows have been assessed for VSC at this property and 65 would remain compliant with the BRE. The remaining 70 windows would see noticeable losses of VSC with ten windows experiencing minor reductions of 2%-30%, 14 experiencing moderate reductions of between 30%-40% and 46 windows seeing major reductions of more than 40%. This would be comparable to the existing versus proposed scenario.
248. A total of 59 rooms have been assessed for NSL and whilst 36 would meet the BRE standards, 23 rooms would see noticeable reductions with five minor, five moderate and 13 major reductions.
249. Of the 70 windows that would be affected in terms of VSC, 39 would be bedrooms and all losses would be categorised as major as they would be in excess of 40%. The 39 windows serve 22 bedrooms. Of these 22 bedrooms, 14 would benefit from additional windows that would remain unaffected in terms of VSC losses. The remaining eight bedrooms would experience varying levels of impacts with four bedrooms retaining VSC levels of between 7.8% and 8.5%, two bedrooms retaining between 14.6% and 18% and the remaining two bedrooms both achieving residual VSC levels in excess of 21%.
250. The remaining 31 windows affected in terms of VSC would serve a total of 26 living spaces and 22 of these rooms would benefit from additional windows that would remain unaffected in terms of VSC. The remaining four living spaces would see minor VSC reductions of between 21% and 24% and in all instances would retain 100% NSL. The cumulative effect on this property is concluded as moderate to major in the ES which is the same as the existing versus proposed scenario. Overall, the impact is considered acceptable given the central London location, the principal use of the most affected rooms as bedrooms and the fact that the living spaces would retain windows unaffected in terms of VSC and full compliance with NSL.

2-4 Melior Place

251. A total of 14 rooms have been assessed for NSL at this property and it is noted that all rooms would continue to comply with the BRE. In terms of the VSC assessment, 35 windows have been tested and 21 of them would continue to comply with the BRE guidance. The 14 windows that would see reductions beyond the BRE guidance would experience minor reductions of between 20% and 30% and in all cases the windows would serve bedrooms. Overall the cumulative effect on this building would be minor and the impact would be considered acceptable given the fact that the VSC reductions would be minor, all rooms would continue to comply with NSL and the affected rooms would be bedrooms which are considered less sensitive to daylight impacts.

38 Snowfields

252. Five rooms have been tested for NSL at this property and all would remain compliant with the BRE guidance. The VSC assessment covered five windows all of which would see moderate reductions in VSC however it should be noted that the actual real terms VSC reductions would be low. The cumulative effect on this property would be classed as minor to moderate and would be acceptable given the fact that there would be full compliance in terms of NSL and that, despite the proportional VSC reductions being classed as moderate, the actual real terms VSC reductions would be low. This is comparable to the existing versus proposed scenario.

39 Snowfields

253. A total of 18 windows have been tested at this property in terms of VSC. Whilst five windows would remain compliant there would be two windows that would experience minor reductions, ten windows that would see moderate reductions and one window that would see a major reduction. It should be noted that the real terms VSC reductions are generally low with half of all windows seeing reductions of less than 3%. In terms of NSL, 14 rooms have been tested and whilst 13 would remain compliant with the BRE there would be one room that would experience a moderate reduction. The cumulative effect on this building would be minor to moderate and would be acceptable given the high level of NSL compliance.

40 Snowfields

254. At this property, 14 rooms have been tested for NSL and 12 would remain compliant. The two rooms that would see reductions in NSL beyond the BRE would only experience minor reductions. In terms of VSC, 18 windows have been tested and whilst ten would remain compliant there would be four windows seeing minor reductions, three experiencing moderate reductions and one window experiencing a major reduction. It should be noted that the single window that would experience a major reduction in VSC would retain at least 76% NSL which would only be 4% short of the BRE guidance. The cumulative effect on this building would be minor to moderate and would be acceptable on balance given the high level of NSL compliance and the fact that the real terms VSC reductions would be low.

41 Snowfields

255. At this property 13 rooms have been tested for NSL and whilst 11 would remain compliant, two would experience minor reductions. The VSC assessment has considered 13 windows and nine would remain compliant. In terms of the affected windows there would be one minor reduction, one moderate reduction and two major reductions. It should be noted that the two windows that would experience major VSC reductions would retain at least 75% and 74% NSL which would only be considered a minor NSL effect. The cumulative effect on this property would be minor to moderate.

43 Snowfields

256. Six windows have been tested for VSC at this property and all of them would experience reductions beyond the BRE guidance. Two windows would experience moderate reductions in VSC whilst four windows would see major reductions. In terms of NSL, six rooms have been tested and five would remain compliant with the BRE. One room would experience a major reduction. It should be noted that the actual VSC reductions are small and all but one room would remain compliant with NSL. The room that wouldn't comply with NSL is served by a window that would see a real terms reduction in VSC of just 3.5%. The cumulative effect on this property is therefore considered to be moderate and the impact is considered acceptable.

64-66 Weston Street

257. All 12 rooms assessed for NSL at this property would remain compliant with the BRE. Of the 12 windows assessed for VSC, 11 would remain compliant with the remaining window experiencing a minor reduction of 25.6% and a real terms loss of just 2.9%. The cumulative effect on this property is therefore considered to be negligible.

62 Weston Street

258. A total of 13 windows serving 12 rooms have been assessed for VSC and NSL at this property. In terms of NSL, seven rooms would remain compliant whilst three rooms would see minor reductions in NSL and two rooms would experience moderate reductions. Of the 13 windows assessed for VSC, one would remain compliant whilst four would experience minor reductions and eight would experience moderate reductions. The overall cumulative effect on this property would be minor to moderate in magnitude.

52-54 Weston Street

259. At this property 13 windows and eight rooms have been assessed for VSC and NSL respectively. The VSC results show that five windows would remain compliant with the remaining windows experiencing minor losses (one window), moderate losses (three windows) and major losses (four windows) although it should be noted that 10 of the 13 windows assessed for VSC would retain residual VSC levels of at least 17.9% and the remaining three windows would serve bedrooms which are considered to be less sensitive to daylight effects.

260. The NSL results show that six of the eight assessed rooms would continue to comply with the BRE. The two affected rooms would see a minor and a moderate loss of NSL. The room that would experience a minor reduction would be a bedroom and the room that would experience a moderate reduction would retain at least 21% VSC which is good for an urban area. The cumulative effect on this property is therefore considered to be minor.

Wolfson House

261. A total of 165 windows serving 135 rooms have been assessed at Wolfson House. All 135 rooms assessed for NSL would remain compliant with the BRE. In terms of the VSC assessment, 146 of the windows would remain compliant with the BRE whilst the remaining 19 windows would all see minor VSC reductions whilst retaining at least 15% VSC. The cumulative effect on this property is therefore considered minor.

115-122 Snowfields

262. A total of 34 windows serving ten rooms have been assessed for VSC and NSL at this property. All 34 windows would remain compliant with the BRE in terms of VSC. Seven of the ten rooms assessed for NSL would remain compliant with the BRE and the affected rooms would see two minor reductions and one major reduction albeit that these rooms would benefit from windows that would remain fully compliant with the BRE for VSC. The cumulative effect on this property is considered to be negligible.

115-144 Guinness Court

263. VSC has been assessed at 53 windows whilst NSL has been assessed in 37 rooms at this property. In terms of VSC, 51 windows would remain compliant with the BRE and the remaining two would experience minor reductions of between 20% and 30%. It should be noted that the real terms VSC reductions at these windows would be 3.5% and 2.6% which is minor.
264. The NSL assessment has demonstrated that 33 of the 37 rooms would comply with the BRE whilst two rooms would see minor reductions and two would experience moderate reductions. It should be noted that the two rooms that would experience moderate reductions in NSL would benefit from windows that would continue to be compliant in VSC. The cumulative effect on this property is therefore minor.

1-15 Guinness Court

265. All 23 windows assessed for VSC at this property would remain compliant with the BRE guidance. Ten of the 15 rooms assessed for NSL would remain compliant with the BRE and the five rooms that would see reductions beyond the BRE would experience minor losses of between 20% and 30%. It should be noted that these rooms are all bedrooms and as previously mentioned, bedrooms are less sensitive to daylight effects. The cumulative effect on this property is therefore minor.

8-20 Snowfields

266. A total of 58 windows serving 51 rooms have been assessed for VSC and NSL at this property. In terms of VSC, 42 windows would remain compliant with the BRE. The remaining 16 windows would see minor reductions and 15 of these windows are located at first floor under the access deck which itself impedes access to daylight. It should be noted that the real terms VSC reductions to these windows is less than 2.6% and as such is very minor.
267. Of the 51 rooms assessed for NSL, 43 would remain compliant with the BRE and the remaining windows would see six minor reductions, one moderate reduction and one major reduction. The moderate and major reductions would both be located under the access deck at first floor level. The overall cumulative effect on this property would be minor.

The Horseshoe Inn

268. Six windows and four rooms have been assessed for VSC and NSL at the Horseshoe Inn. All four rooms assessed for NSL would continue to comply with the BRE. Two of the six windows assessed for VSC would comply with the BRE and the remaining four would see minor reductions. As such the cumulative effect on this property would be minor.

Sunlight

269. The only existing property with windows facing within 90 degrees of due south and as such requiring a sunlight assessment More Cooper House at 14 Magdalen Street. The results of the sunlight assessment demonstrate that the Annual Probable Sunlight Hours (APSH) would remain compliant with the BRE both after development and as part of the cumulative scenario set out above.

Overshadowing of amenity spaces

270. The effects of the development on overshadowing have been considered at the following amenity spaces:
- On-site pocket park
 - Proposed public realm at Vinegar Yard
 - St Johns Churchyard.
271. It should be noted that St Johns Churchyard will remain unaffected by the proposed development in terms of overshadowing. Likewise the proposed amenity space at the Vinegar Yard site would not be materially affected by the proposed development.
272. The proposed on-site pocket park would achieve 42.5% of the space with access to at least two hours of direct sun on March 21st which is only slightly below the 50% target set by the BRE. On June 21st, when the outdoor space is expected to be used more intensively, this figure would increase to 94.4% demonstrating that the space would be well lit. It is acknowledged that the consented Capital House scheme would, when completed, reduce sunlight

amenity to the space, but that overall amenity would remain good during the summer months when the outdoor spaces are most used.

Conclusion on daylight and sunlight

273. The daylight and sunlight assessment presented as part of the ES demonstrates that there would be several windows that would see noticeable losses of VSC and rooms that would see noticeable losses of NSL beyond the BRE guidelines. A total of 24 receptor groups (groups of residential properties) were assessed (comprising 853 windows and 518 habitable rooms) in order to determine whether there would be a significant change in daylight levels as a result of the proposed development.
274. The majority of these residential properties would experience either negligible reductions (10 properties) or minor reductions (10 properties) and both of these categories are considered to be non-significant in terms of daylight effects.
275. It is noted that Our Lady of La Salette and St Joseph Church would experience effects that would be considered major and the impact here is considered acceptable given that only a small number of windows and rooms (three windows and four rooms) would be affected. It should be noted that one of the rooms is a bedroom which the BRE recognises as being less sensitive to daylight loss and the other room would be a living space that would only marginally fall below the BRE standards of NSL by 2%. Consideration also needs to be given to the fact that this property would benefit from improved outlook as a result of facing directly onto the proposed pocket park.
276. Moderate to major effects would be experienced at 6-12 Melior Street/36 Snowfields. Overall, the impact is considered acceptable given the central London location, the principal use of the most affected rooms as bedrooms which are less sensitive to daylight losses and most importantly to the fact that the living spaces would retain windows unaffected in terms of VSC as well as remaining fully compliant in terms of NSL.
277. The properties at 48-50 Weston Street/16 Melior Street and 43 Snowfields would experience effects categorised as moderate. In the case of 48-50 Weston Street/16 Melior Street the overall impact is considered acceptable given the central London location, the principal use of the most affected rooms as bedrooms and the fact that the living spaces would retain windows unaffected in terms of VSC and full compliance with NSL. In terms of 43 Snowfields the effect on this property would be moderate however it would be acceptable given the high level of compliance with NSL with five out of six rooms remaining compliant.
278. The application site has been identified in policy, including in the New Southwark Plan, as being suitable for a tall building and it is anticipated that there would be a degree of impact as a result of redevelopment. Developing sites in highly urbanised environments often results in some unavoidable impacts to daylight and sunlight. Recognising the challenges associated with developing inner city sites, the numerical targets given in the BRE are expected to be treated with a degree of flexibility, having due regard for the existing and

emerging context within which these sites are located. The application site is within a Central London Opportunity Area and accordingly the standards should be applied with some degree of flexibility.

279. Looking at the nature of the rooms affected, many are bedrooms, where the primary use means that the BRE gives these rooms a lower expectation in terms of daylight. Other affected rooms are living spaces, many of which would benefit from windows that would remain unaffected in terms of VSC. Given the small number of windows overall that would experience significant effects and the site specific circumstances set out above, it is considered that the overall impact, both existing versus proposed and existing versus cumulative, would be acceptable on balance given the benefits of the proposed development in redeveloping a currently under developed site, the provision of new offices, retail and significant employment opportunities. On balance, officers consider that, when reading the BRE guidance with the required flexibility, and in view of the positive benefits of the development proposal, the degree of harm to amenity would not justify withholding planning permission in this case

Solar glare

280. Solar glare has been assessed in the ES as part of the section on daylight and sunlight (Chapter 11). The solar glare analysis considered the potential effects at eight viewpoints. These include five viewpoints on the westbound train line into London Bridge Station, one viewpoint travelling westbound on Crucifix Lane (at the junction with Bermondsey Street), one viewpoint travelling eastbound on St Thomas Street (at the junction with Weston Street) and a final viewpoint travelling northbound on Kirby Grove (at the junction with Snowfields). All viewpoints assessed would experience minor effects which are not considered to be significant for reasons including low traffic levels, multiple traffic signals and a 20mph speed limit.

Noise and vibration

281. Noise and vibration have been assessed as part of the ES and the results of the assessment are presented within chapter 9. The main considerations assessed as part of the ES are:
- Construction noise and vibration impacts on the nearby noise sensitive receptors;
 - The control of noise egress from building plant and services on nearby sensitive receptors; and
 - The control of noise egress from operations of the building on nearby sensitive receptors.
282. The ES considers the high sensitivity receptors to be homes on Melior Street, Snowfields and Weston Street in addition to Guys Hospital and the Kings College accommodation at Wolfson House. Our Lady of La Salette and St Joseph Church is included as a medium sensitivity receptor.
283. Baseline noise and vibration data has been gathered through monitoring within the vicinity of the proposed development. The surrounding noise conditions are predominantly characterised by the operation of London Bridge Station. The

vibration survey indicated that there are negligible levels of vibration on the site.

284. During the demolition and construction phase effects categorised as both moderate and major have been identified at nearby sensitive receptors. The noise predictions have been based on a worst case scenario and as such there will be an opportunity for the contractor undertaking construction to reduce noise impacts. This mitigation will include limiting noisy works to specific times of the day, keeping plant well maintained, using silencers on mechanically operated plant where possible as well as securing a Demolition and Construction Environmental Management Plan as part of the S106 Agreement.
285. With appropriate mitigation in place the nearest sensitive receptors along Melior Street and Weston Street would experience reduced effects, as far as possible however they would still be significant during the demolition and construction phase, due to their proximity to the site. Vibration effects would be moderate at 8-14 Melior Street and minor to negligible at all other receptors. These effects would be temporary and would be a result of construction activities.
286. Once the construction phase is finished and the development has been completed, the assessment reviewed permanent sources of noise such as from road traffic and plant equipment/services. It is noted that whilst additional vehicles will generate increased noise at some receptors the increase would not be significant. Additionally, the noise emitted from plant equipment and building services would not result in any significant effects. In terms of cumulative impacts, the completed and operational development, taken together with other schemes in the area, would not result in significant effects.

Transport and highways

287. 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.

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.

288. 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

289. The site is bounded by St Thomas Street to the north; Fenning Street and

Vinegar Yard to the east; Melior Street to the south; and the Capital House development site to the west. St Thomas Street forms part of the Transport for London Road Network (TLRN), and the nearest section of the Strategic Road Network (SRN) is Cannon Street, which is located approximately 600m to the north of the site on the other side of the Thames at Monument.

290. The nearest station is London Bridge, which is served by the Underground (Jubilee and Northern lines) and National Rail services with entrances 200m and 300m from the western end of the site on St Thomas Street. Bus stops for routes 17, 21, 35, 40, 43, 47, 48, 133, 141, 149, 343, 344, 381, 521 and RV1 are within 300m of the site at London Bridge Bus Station, Borough High Street, and Tooley Street. River Services can be accessed approximately 620m to the north of the site from London Bridge Pier.
291. Due to the aforementioned public transport connections 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 stations are located at Snowfields, Potters Fields Road and Tanner Street.
292. The site is also in close proximity to several cycle routes. Cycle Superhighway 3 (CS3) can be accessed at Monument and (CS7) on Southwark Bridge Road approximately 400m and 600m respectively to the west of the site. Cycle Superhighway 34 (CS4) is planned to run between Tower Bridge and Greenwich with the nearest point being some 1km to the east, and there is an aspiration to extend this to London Bridge via Tooley Street. National Cycle Network Route 4 (NCN 4) can be accessed approximately 200m north of the site on Tooley Street. Union Street and Newcomen Street, approximately 310m to the south of the site forms part of the Central London Grid/proposed Quietway 14.

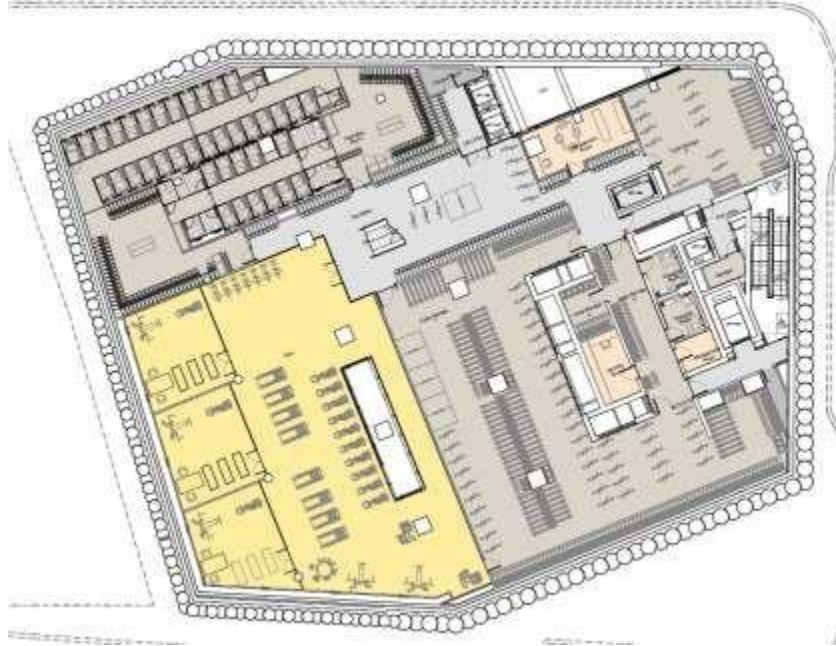
Site layout

293. The proposed site layout would be simple and rational given the proposal for a single building. The layout would improve legibility and connectivity, providing a generous and direct physical and visible link between London Bridge Station/St Thomas Street and Melior Street. A servicing bay would be provided on Fenning Street and a disabled parking bay would be provided on Melior Street.

Trip generation

294. The Council's transport officer has 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. As part of the Council's assessment, the TRICS database has been reviewed, looking at comparable developments and travel surveys in addition to the information submitted by the developer as part of the transport assessment and the ES.

Basement cycle parking



295. The proposed development is anticipated to generate 56 and 37 two-way vehicle movements in the morning and evening peak hours, respectively. Although these figures are significantly higher than the zero vehicle movements predicted by the applicant's consultants, the Council's transport officer considers that these levels of net supplementary vehicular traffic would not have any noticeable adverse impact on the prevailing vehicle movements on the adjoining roads. This is a view echoed by TfL who consider that the development would not have an adverse impact on the TLRN.
296. In terms of public transport, the applicant's consultants have estimated that this development would create an additional 802 and 828 two-way public transport trips in the morning and evening peak hours and approximately 82 two-way service vehicle trips per day. It is envisaged that the projected reduced service vehicle figure would be achieved through the applicant's use of an off-site delivery consolidation centre. Both forecasted generated public transport and delivery vehicle trips compare with the Transport officer's own estimates and are therefore judged to be reasonable.
297. In any event, the applicant has proposed travel plan initiatives encompassing the provision of cycling facilities (40 shower cubicles and 447 lockers, bike maintenance space, plus cycle parking), travel information and appointment of a travel plan co-ordinator who would promote sustainable travel including organising and publicising sustainable travel events in addition to monitoring the travel plan. A Construction Logistics Plan, Demolition and Environmental Management Plan and Travel Plan will be secured in the S106 Agreement alongside contributions towards improved bus services.

Servicing and deliveries

298. The servicing arrangements for this development would involve servicing from a loading bay on Fenning Street. Given that there are several development sites on this stretch of St Thomas Street it is considered to be imperative that there would be service and delivery consolidation. Details of delivery and servicing management would be secured under the S.106 Agreement and this should provide full details of how consolidation measures would be provided and demonstrate that the proposed servicing arrangements would be robust and sufficient to meet the requirements of the development and should be supported by a daily arrival unloading and departure profile showing how the proposed facilities will be used.

Refuse storage arrangements

299. Refuse will be stored within a central store in the basement which is sufficiently sized and located to accommodate all waste generate by the proposed development. The bins would be transferred to a ground floor holding area adjacent to the loading bay on Fenning Street on the day of collection. These details will be secured by condition.

Car parking

300. 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. The development would provide one accessible car parking bay and whilst two would be required by the policy, one space is considered acceptable in this instance given the excellent availability of public transport in the area the high level of accessibility at London Bridge Station and Underground Station. The disabled parking bay will be secure by condition and this will also require the bay to be fitted with electric vehicle charging facilities. Conditions will be added in order to prevent occupiers of the proposed development from obtaining parking permits for any of the Southwark Controlled Parking Zones.

Cycle parking and cycling facilities

301. The development would provide 551 cycle parking spaces comprising; 62 folding bike spaces; 260 double-stack spaces; 8 disabled spaces (basement); and 4 Sheffield cycle racks containing 8 spaces on the ground floor. This would comply with the updated standards of Policy T5 of the London Plan 2021. A total of 447 cycle lockers and 40 shower cubicles in addition to two bicycle maintenance stations and ironing facilities would also be provided. These facilities are considered to be acceptable and would help to maximise the number of people cycling to and from work. It is noted that the cycle parking level is below the enhanced levels required in the New Southwark Plan however, it is considered that the sites location next to London Bridge Station and the enhanced facilities provided for cyclists on site would compensate for the shortfall given that the policy has limited weight at the moment. Contributions will be secured in the S106 agreement towards improved cycle

hire facilities in addition to Legible London signage.

Environmental impacts

302. Transport has been fully reviewed for any potential environmental impacts and this information is set out in detail in chapter 7 of the ES which has looked at the potential effects on severance; pedestrian and cyclist delay; driver delay; accidents and safety, public transport; transport users; and pedestrian and cyclist amenity, fear and intimidation. During the demolition and construction phase, the ES concludes that there would be no significant impact on any of these parameters/receptors with effects being categorised as negligible. This would also be the case when assessing the impact of the completed development with all effects being categorised as negligible with the exception of one element of the severance category which would see a low adverse effect on St Thomas Street and this has been categorised as 'not significant' in the ES.
303. Consideration has also been given to the potential for cumulative effects that could occur during the construction phase and as part of the completed development. In both instances the effects are considered negligible and as such not significant.
304. Climate change has been considered as part of the traffic and transport ES assessment and it is concluded that it will not have a direct effect on severance; delay; or amenity, fear and intimidation. Changing to more sustainable and active travel modes, lower emission vehicles and improved technology (which would also increase telecommuting and flexible working) could result in a reduction in peak hour traffic and the consequent reduced emissions and traffic volumes could have a benefit for cyclists and pedestrians.

Conclusions on transport

305. The proposed development would have a simple, open and well defined site layout that would improve legibility and connectivity by providing generous and direct new routes between London Bridge and Melior Street and onwards to Bermondsey Street and area south of Snowfields. The development would be car free and would encourage the adoption of more sustainable forms of transport such as walking, cycling and public transport.
306. The proposed development would provide a range of cycle parking options as well as extensive facilities to encourage cycling to work. A financial contribution towards extending the cycle hire scheme would also be secured as part of the S106 agreement.
307. The ES has given an in depth assessment of the possible environmental impacts that could arise as a result of the development and has concluded that there would be no significant effects. The development has been shown to have a very limited impact on the public transport network. Vehicle trips would also be limited and the proposed servicing arrangements would minimise any highway impacts.

Environmental matters

Ground conditions and contamination

308. A land contamination assessment has been prepared with regard to the advice contained in the Contaminated Land (England) Regulations 2006 and associated statutory guidance.
309. The Phase 1 Assessment has considered historical uses; environmental permits, incident and registers; landfill and other waste sites; current land uses; and other hydrological, geological and natural/man made ground conditions.
310. The assessment notes that there are no records of any potentially contaminative historical uses on the site itself. In terms of the current site there is one potentially contaminative industrial site on the plot and that is the electricity substation which is situated in the eastern part of the site. Within the existing building itself, the report notes that there is the potential for the presence of asbestos, hydrocarbons, Polycyclic Aromatic Hydrocarbons (PAH's) and metals.
311. As with all applications of this size it is recommended that the standard conditions around land contamination, surface runoff, protection of groundwater, asbestos, soil sampling and remediation measures be imposed to ensure that there would be no adverse impacts resulting from the proposed development in terms of ground conditions or contaminants within the existing building. These conditions would need to be satisfied prior to any development taking place on site and would provide appropriate mitigation for any potential land contamination issues.

Fire safety

312. 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; designed and constructed in order to minimise the spread of a fire; and provide suitable and convenient means of escape for all building users.
313. 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.
314. 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 fire suppression 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.

315. The building will be provided with 2 firefighting shafts containing a firefighting stair, firefighting lobby with fire main and a firefighter lift. Fire mains enable firefighters within a building to connect their hoses to a water supply. In buildings fitted with fire mains, pumping appliances need access to the perimeter at points near the mains, where firefighters can enter the building to make a hose connection from the appliance to pump water into the main. As the building is fitted with dry fire mains, there will be access for a pumping appliance to within 18 m of each fire main inlet connection point, typically on the face of the building, and the inlet will be visible from the appliance. Drawings have been provided showing access routes. Overall the Fire Strategy is considered to comply with the requirements of Policy D12 of the London Plan 2021.

Flood risk

316. The application site is located within Flood Risk Zone 3A and as such a Flood Risk Assessment, Basement Impact Assessment and Drainage Strategy have been submitted as part of the application. The main source of flood risk in Southwark is as a result of tidal activity within the River Thames which lies approximately 400m 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.
317. The Environment Agency have been consulted on the proposed development and have not raised any objections subject to conditions. The relevant conditions would be imposed on any consent issued.

Sustainable urban drainage

318. The sustainable urban drainage (SUDS) proposals for the site includes a combination of a blue roof system covering part of the roof of the main building and a permavoid geo-cellular storage layer at podium level in order to limit discharge rates.
319. The blue roof would span the south eastern part of the main roof and would have an area of 243 square metres and a depth of up to 0.108m. Overall this would provide up to 18 cubic metres of storage. The permavoid geo-cellular layer would be part of the surface treatment which would include a permeable paving system. The storage layer would have an area of approximately 1000 square metres and a depth of 0.150m which would give a storage capacity of 143 cubic metres. The combination of the blue roof and geo-cellular storage layer would provide sufficient storage for the 1 in 100 year storm event as well as an additional 40% climate change capacity.

Socio Economics

320. The impact of the development on socio-economics has been assessed as part of the ES (chapter 6) and focuses on key social and economic considerations such as job creation, local economy, provision of employment floorspace and provision of public open space.
321. During the demolition and construction phase of the development, it is estimated that up to 2,200 temporary construction jobs could be created. This employment would include a range of job types and would not just be limited to on-site jobs. The creation of construction related employment would be beneficial.
322. Once the proposed development has been completed and is operational it is estimated that up to 1,900 full time jobs would be created on-site which is a significant beneficial effect at local level. The current office on site supports 330 jobs therefore the proposed development would create an uplift of approximately 1,570 full time positions. In addition to the on-site jobs, the development could create up to 470 full time off-site jobs. The ES estimates that the additional employment generated at the site would lead to increased economic output in the region of £98.9 million annually within Southwark and Greater London.

Air quality

323. The application site is located within an Air Quality Management Area and the impact of the development on air quality has been assessed as part of the ES. The results of this assessment are reported in Chapter 8 of the ES. In terms of potential air quality effects, the assessment has 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;
 - Whether or not the proposed development is 'air quality neutral'; and
 - The cumulative impacts on air quality of the proposed development in combination with cumulative schemes identified in the local area.
324. The ES 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 diesel generator.
325. 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 ES has demonstrated that this increase would have a negligible impact on air quality at such sensitive receptors as homes and schools. Additionally, with mitigation measures in place, the development would not result in any significant dust effects.

326. 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 heat pumps and as such there would be no emissions associated with the building. It is noted that 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. The operational development would also be considered air quality neutral.

Wind

327. Wind microclimate has been considered as part of the ES and the results are set out in Chapter 10 of the ES. 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.
328. The assessment of the wind conditions requires a standard against which the measurements can be compared. This assessment of the wind tunnel results 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.
329. 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 crossings have also been tested.
330. As existing, wind conditions on the site and the surrounding area are considered suitable for sitting to strolling use during the windiest season and for sitting and standing use during the summer. As construction of the development progresses wind conditions would generally adjust from the baseline (existing) to those of the completed development. It should be noted that windier conditions are considered tolerable across the active demolition and construction site as this area would not be for pedestrian use at this time.
331. The ES has assessed wind microclimate under a scenario whereby the proposed development has been completed alongside existing off site landscaping and proposed on site landscaping (mitigation). In terms of pedestrian comfort, wind conditions under this scenario would range from suitable for sitting to walking during the windiest season. In the summer months the conditions would generally be calmer and would range from being suitable for sitting to strolling use.
332. Wind conditions at the majority of on- site and off site thoroughfares would range from suitable for sitting to strolling during the windiest season and as

such would not constitute any significant effects. Wind conditions at two locations (one on-site at probe location 54 and one off-site at probe location 62) would remain suitable for walking use during the windiest season and would represent a minor adverse effect.

333. Wind conditions at all entrances (both on-site and off-site) would range from suitable for sitting to standing use during the windiest season and would represent minor beneficial to negligible effect.
334. Further assessment under this scenario notes that the proposed on-site amenity space would have some instances of wind speeds that would be one category windier than suitable and would represent a minor adverse effect. It should be noted that all off-site amenity spaces as well as the on-site balconies and roof terraces would see wind conditions suitable for their intended use and as such would represent negligible effects. The ES notes that under this scenario there would be one instance of strong winds (probe location 62 on St Thomas Street) however with the approved Capital House development in place this instance of strong winds would not occur.
335. The wind microclimate assessment considers further scenarios including a scenario whereby the proposed building is completed alongside other committed developments (those benefitting from planning permission) including both off-site existing landscaping and proposed on-site landscaping (mitigation).
336. This scenario includes the Capital House development which has been approved and is in the process of discharging pre-commencement conditions. Under this scenario, pedestrian comfort levels would range from being suitable for sitting/strolling during the windiest season and sitting/strolling during the summer months. Wind conditions at all on-site and off-site thoroughfares would range from suitable for sitting/strolling use during the windiest season which is considered to be a moderate beneficial to negligible effect.
337. Wind conditions at the majority of both on-site and off-site entrances would be suitable for sitting to standing use during the windiest season and would be a minor beneficial to negligible effect. Wind conditions at one off-site entrance (probe 91 on Fenning Street) would remain suitable for strolling use during the windiest season which would be one category higher than suitable. This would represent a minor adverse effect and further mitigation would be required.
338. In terms of amenity spaces, the proposed on-site amenity space would have conditions suitable for sitting/standing during the summer months and one category higher during the windiest season which would represent a negligible and minor adverse effect. All off-site ground floor amenity spaces would maintain suitable conditions for their use and it should be noted that all of the on-site balconies and roof terraces would see wind conditions suitable for their intended use and as such this would represent a negligible effect. There would be no instances of strong winds or significant effects relating to safety as a result of the proposed development in this scenario.
339. Climate change has been considered as part of the Wind Microclimate Assessment and it has been concluded that the probable changes in median

wind speed from current figures to those expected in 2080 are not likely to have any significant effect on the predicted wind and microclimate conditions in and around the site.

340. The ES demonstrates that wind conditions across the site and surrounding area would range from sitting to walking use throughout the year with generally calmer conditions in the summer months. Proposed mitigation would help reduce unsuitable conditions and it is noted that there would be no major effects as a result of the development. With the appropriate mitigation in place and taking into account permitted and progressing schemes such as Capital House, there would be no instances of strong winds or significant effects that would compromise safety. In order to ensure the outcomes of the ES are realised with regards to wind microclimate and to ensure a suitable process to mitigate any further wind impacts that may be identified during and post construction, a Post Construction Wind Mitigation Review will be required as part of the S106 agreement.

Light pollution

341. The ES has considered light pollution as part of Chapter 11 and notes that whilst some light levels on Melior Street could exceed the post curfew (11pm) limit of 5 lux. However, the ES notes that this is based on a worst case scenario of all lights within the building remaining on and no use of shading devices such as blinds.
342. Occupancy of the building post curfew would be significantly reduced compared to business hours and the building would be largely unoccupied at this time. The use of blinds in addition to occupancy sensors that can automatically turn off the lights unoccupied parts of the buildings will result in minimal light spillage post curfew and the effect of light spillage/pollution on nearby properties is considered negligible and not significant. This would also be the case when reviewing the cumulative scenario.

Climate change

343. Climate change has the potential to alter and affect the current environment and the applicant has Met Office projections to develop a future climate scenario to assess how environmental and socio-economic effects might change as a result of a changing climate. These projections look at a series of different greenhouse gas emissions scenarios and how they would impact on the climate.
344. Climate change 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. Taking all of these matters into account on the relevant topics that have been assessed throughout the ES it is not anticipated that the likely effects identified would change as a result of climate change.
345. Greenhouse gas emissions have the potential to increase air temperature and are described as significant in accordance with the relevant guidance for the assessment of greenhouse gases as part of the Environmental Impact Assessment process. This is a result of the fact that all development projects

create greenhouse gas emissions that contribute to climate change; and climate change has the potential to lead to significant environmental effects.

346. The design has incorporated a number of measures to minimise the creation of greenhouse gases including the type of materials being used, construction site management, the use of a building management system 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

347. The London Plan Policy SI 2 – Minimising greenhouse gas emissions, sets out that development proposals should be net zero carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy. The energy hierarchy is as follows:

- Be lean: use less energy;
- Be clean: supply energy efficiently;
- Be green: use renewable energy.
- Be seen: monitor, verify and report on energy performance.

348. This policy requires major development to be zero carbon and achieve an on-site reduction in carbon dioxide emissions of 35% beyond Building Regulations Part L 2013 as specified in Mayor’s Sustainable Design and Construction SPG. The policy requires that the 35% minimum be achieved on site and acknowledges that the remaining 65% reduction can be achieved through a cash in lieu contribution to the borough’s carbon offset fund or through identified off-site measures where delivery can be assured..

349. Developments should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process. Within the framework of the energy hierarchy major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.

350. Strategic Policy 13 of Core Strategy states that development will help us live and work in a way that respects the limits of the planet’s natural resources, reduces pollution and damage to the environment and helps us adapt to climate change. The applicants have submitted an Energy and Sustainability Statement for the proposed development which seek to demonstrate compliance with the above policy. The various measures proposed under the energy hierarchy are set out in detail below:

Be Lean

351. The development would incorporate a range of passive and active design measures that would reduce carbon emissions through energy efficient design and construction. Passive measures would include:

Thermal insulation and air tightness targets exceeding the Building Regulations;

Solar control glazing to maximise daylight whilst mitigating excess solar gains;

Mixed mode ventilation with openable windows to enable purging of excess heat.

352. Active measures would include:

- Energy efficient lighting will be used alongside low power sensors, time switch controls and automatic on/off control;
- Air handling units fitted with heat recovery to improve energy performance;
- Use of a panelised chilled ceiling system to provide heating and cooling at the perimeter;
- Displacement ventilation in the reception area;
- Use of cooling towers combined with the use of air source heat pumps to provide space heating, cooling and domestic hot water;
- Energy efficient lifts and escalators;
- Employment of 'Category A' energy efficient equipment and appliances;
- Installation of a building management system to monitor and control building services and enable optimum operation.

Be Clean

353. Currently there are no nearby district heating networks within 1km of the site that the development could connect to and no on-site CHP system is proposed given the negative carbon value that can be attached to CHP. As such, no carbon savings are reported from the 'Be Clean' stage of the energy hierarchy. The development would be futureproofed in order to ensure the potential to connect to a future district heating network should one become available.

Be Green

- Use of High Efficiency Air Source Heat Pumps with simultaneous heating and cooling;
- Provision of photovoltaic panels on the roof to generate electricity.

Be Seen

354. 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.

355. 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.
356. The applicant is proposing to display a DEC and put in place a plan to monitor energy demand and carbon emissions and report to the GLA on an annual basis for at least five years.
357. Effective metering and monitoring will be enabled so that at least 90% of the estimated annual energy consumption is assigned to specific end users, such as space heating, hot water heating, cooling, ventilation etc). Meters will be linked to the appropriate Building Energy Management System (BEMS) and this will allow further monitoring. This approach will ensure energy efficiency is delivered in reality, and is identified as best practice within GLA 'Be Seen' draft guidance.

Carbon reduction

358. Taken together, the Be Lean and Be Green measures would achieve a total carbon reduction of 55.1% taking into account SAP10 and decarbonising of the electricity grid and would exceed the requirements of the policy. A financial contribution to the carbon offset fund of £512,145 would bring the development to carbon zero and would fully comply with policy SI 2. The development would also meet the requirement to generate 20% of this carbon reduction through the use of on-site renewable energy. The proposed office accommodation is expected to achieve a BREEAM 'Outstanding' which is an excellent indicator of the schemes energy efficiency and sustainability. The carbon reduction and sustainability measures are a positive aspect of the development. The relevant BREEAM rating would be secured by condition and the relevant carbon reduction would be secured as part of the S106 Agreement.

Whole life cycle and carbon capture

359. Policy SI 2 – Minimising Greenhouse Gas Emissions of the London Plan requires developments to calculate whole life-cycle carbon emissions through anationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken that would serve to reduce life-cycle carbon emissions.
360. As set out in the Energy and Sustainability Statement, construction materials with a low environmental impact over the full life cycle of the building will be employed wherever possible. Life-Cycle Assessments (LCAs) have been carried out to help identify materials with low impact and assess the possibility to meet the RIBA embodied carbon targets for 2020, 2025 and 2030. The applicant's structural engineer has undertaken various studies including structural frame, slab options and timber mix as being the lowest carbon solution that was practicable for a building of this height and form. Further strategies have been identified that would assist the development in exceeding the current 2020 targets and meeting the 2025 target by further reducing

embodied carbon.

Circular Economy

361. Policy SI 7 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:
1. How all materials arising from demolition and remediation works will be re-used and/or recycled.
 2. 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.
 3. Opportunities for managing as much waste as possible on site.
 4. Adequate and easily accessible storage space and collection systems to support recycling and re-use.
 5. How much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy.
 6. How performance will be monitored and reported.
362. The Energy and Sustainability Statement sets out that the deconstruction of the existing buildings will be undertaken carefully to ensure that building elements or materials would be appropriately recycled and/or used within the proposed development used or off-site.
363. As part of the BREEAM provisions, the applicant has completed a pre-demolition audit of the existing building, structure and hard surfaces. This survey will be used to maximise the recovery of material for subsequent use. Additionally, the applicant has conducted a study to explore the ease of disassembly and the functional adaptation potential of different design and has developed recommendations or solutions, based on this study, with the aim to enable and facilitate disassembly and functional adaptation. The applicant will then produce a building adaptability and disassembly guide to communicate these characteristics allowing functional adaptability and disassembly to prospective tenants.

Overheating

364. London Plan Policy SI4 Managing heat risk and The New Southwark Plan policy P68: Sustainability standards set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The 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).

365. The steps set out in the hierarchy have been applied to the proposed development in sequence and systematically as part of the design process and is set out below in sequential order.

Minimise internal heat generation through energy efficient design

366. The development incorporates the use of internal light fittings with high efficacy, controlled by daylight and/or occupancy sensors where appropriate. All equipment and appliances within the building will be energy efficient. All pipes, especially domestic hot water pipes, will be well insulated and this will include all header pipes and pumps.

Reduce heat entering the building

367. The proposed building would include balconies, vertical shading, internal shading and a facade structure that blocks solar heat before it enters conditioned spaces. The facades will incorporate solar control glazing to reduce solar gains and high visible transmittance to improve daylight availability. In construction, insulation and air tightness targets will be employed that reduce conduction gains without trapping excessive heat in the building. The development will also incorporate low-albedo materials and greenery in the form of vegetated balconies and green substrate over blue roofs to mitigate the urban heat island effect.

Manage the heat within the building

368. The development would incorporate the use of an underfloor air distribution system that maximises the floor-to-ceiling height and enables access to the thermal mass at ceiling level to temper space air and radiant temperatures.

Use passive ventilation

369. Openable windows will enable natural ventilation and free cooling.

Use mechanical ventilation

370. In terms of mechanical ventilation, the proposal includes:

- Mechanical ventilation with energy recovery wheels in AHUs that serve office spaces.
- Increased ventilation rates that deliver free cooling for extended periods.
- Demand controlled ventilation in office spaces that adapts the ventilation rate based on gas sensors.

Use active cooling systems (low carbon)

371. Whilst the cooling hierarchy set out above will significantly reduce the need for cooling, they will not be sufficient to avoid overheating risk throughout the year. As a result, the building will be provided with comfort cooling through a combination of chilled ceilings in the upper levels, displacement ventilation at the podium level and perimeter trench units with low specific fan power to meet the specific thermal comfort requirements of the building occupants. To meet this cooling demand in the most energy efficient and low-carbon manner, high efficiency air source heat pumps will be employed.

Planning obligations (S.106 agreement)

372. 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

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

Planning Obligation	Mitigation	Applicant Position
Archaeology	£11,171	Agreed
Carbon offset	£512,145	Agreed
Employment during construction	Provide 80 jobs, 80 short courses and 20 construction industry apprentices for Southwark residents or make a payment of £386,000.	Agreed
Employment in the development	Provide 186 sustained jobs for unemployed Southwark residents or make a payment of £799,800.	Agreed
Leathermarket Gardens	£100,000 towards improvements to Leathermarket	Agreed.

	Gardens	
Transport for London	<p>A contribution is sought towards the St Thomas Street Healthy Streets scheme.</p> <p>Cycle hire - £160,000.</p> <p>Legible London - £16,000.</p>	Further discussions are taking place with TfL regarding the final Healthy Streets contribution figure and this would be finalised as part of any Stage II Mayoral referral.
Transport (site specific)	<p>Reconstruction of footway on Fenning Street/Melior Street - £17,376</p> <p>Road resurfacing Melior Street - £4,000.</p> <p>Extended raised tables - £40,000.</p> <p>Bus improvement - £135,000.</p>	Agreed
Trees	<p>Not specifically required unless unforeseen issues prevent trees from being planted or they die within five years of completion of the development in which case a contribution will be sought - £8,000 per tree.</p>	Agreed.
Admin fee	2% of total contributions	

S106 Provisions

374. The legal agreement will also secure an Affordable Workspace Strategy (including marketing and management); Estate Management Plan; Demolition and Construction Environmental Management Plan; Construction Logistics Plan; Delivery Consolidation Strategy; Site Wide Energy Strategy (including post construction review); Service Management Plan; Leathermarket Gardens Improvements Strategy; Landscaping Strategy; Basement Impact Assessment Review; Parking Permit Exemption; and Wind Mitigation Post Construction Review. The agreement will also secure an admin charge of 2% of the total contributions.

375. The Legal Agreement will also secure the following S.278 works:

- Repave the footway including new kerbing fronting the development on Fenning Street, and Melior Street (London Borough of Southwark roads) in accordance with the SSDM standards.
- Plant trees and construct tree pits in accordance with the SSDM standards.
- Change all utility covers on footway areas to recessed type covers.
- Reconstruct any redundant vehicle crossovers fronting the development as footway in accordance with the SSDM standards.
- Any highway works in Southwark Council's roads (i.e. Pedestrian crossing, raised entry treatments, etc.) to be constructed in accordance with the SSDM standards.
- Upgrade street lighting to current LBS standards (including on private roads). Investigate the possibility to provide lamp columns mounted to the building walls in order to improve effective footway widths. Please contact Perry Hazell at Perry.Hazell@southwark.gov.uk for further details.
- Review existing and proposed signage fronting the development and investigate the possibility to install any existing / proposed signs on the building walls in order to improve effective footway widths.
- Provide appropriate dropped kerbs for refuse bin collection.
- Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development.

376. In the event that an agreement has not been completed by 31 December 2021, the committee is asked to authorise the director of planning and growth to refuse permission, if appropriate, for the following reason:

377. 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 (2016) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

Mayoral and borough community infrastructure levy (CIL)

378. 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. In this instance, based on information provided by the applicant, an estimated Mayoral CIL payment of £1,936,080 and a Southwark CIL payment of £2,528,368 would be due. This figure is an estimate only, and would be calculated in more detail when CIL Additional Information and Assumption of Liability forms are submitted prior to implementation.

Community involvement and engagement

379. 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 4,654 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 Peter John (former Leader of Southwark Council)
- Councillor Johnson Situ (Cabinet Member for Growth, Development and Planning);
- Councillor Stephanie Cryan (Cabinet Member for Jobs, Business and Innovation);
- Councillor Richard Livingston (Cabinet Member for Environment, Transport and Climate Emergency);
- Ward Members for London Bridge and West Bermondsey;

380. The following community stakeholders were identified:

- Old Bermondsey Neighbourhood Forum;
- The Bermondsey Village Action Group;
- Team London Bridge;
- St Mungo's;
- Better Bankside;
- Living Bankside;
- Better Bankside BID;
- Manna Day Centre;
- Southwark Chamber of Commerce
- Horseshoe Inn

381. 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
Introductory stakeholder letters	18/10/2019
Exhibition invitation (1)	25/10/2019
Public exhibition (1)	08/11/2019 09/11/2019
Update to project website (including information boards and feedback form available at the public exhibition)	11/11/2019
Meeting with Councillor Stephanie Cryan	13/12/2019
Meeting with St Mungo's	21/11/2019
Meeting with Team London Bridge	25/11/2019
Meeting with Councillor Johnson Situ and Councillor Richard Livingstone	02/12/2019
Exhibition invitation (2)	20/12/2019
Public realm and landscaping workshop	08/01/2020
Public exhibition (2)	14/01/2020

Update to project website (including information boards and feedback form available at the public exhibition)	15/01/2020
Meeting with the Manna Day Centre	14/02/2020
Meeting with Living Bankside	19/03/2020

382. Public exhibitions of Pilbrow and Partners emerging proposals for the redevelopment of the site were held on 8 and 9 November 2019. A follow-up exhibition was held on 14 January 2020, at which substantially developed proposals for the site were presented.
383. 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

384. Following neighbour consultation, a total of 75 objections were received which are summarised below:
- The proposed development is too tall.
 - The development would have an adverse impact on the character nearby conservation area.
 - The development would have an adverse impact on the setting of listed buildings
 - There will be reduced demand for office space post Covid.
 - The proposed building is excessive in scale and would be overbearing.
 - The development would impact on the setting of the Shard.
 - The development would block out light.
 - The development would block views.
 - There will be an increase in disturbance due to construction.
 - There has been little to no consultation.
 - The development would lead to congestion and traffic problems.
 - The development would lead to wind impacts.
 - Retail space is not needed in this area.
 - The development will result in excessive noise and disturbance.
 - The privacy of nearby residents will be compromised.
 - The development would reduce safety and security.
 - There would be light pollution affecting residents.
 - How will the use be secured and change of use post covid prevented?
 - The community garden will be lost.
 - Emergency vehicles won't be able to access the building.
 - The development would be a threat to fire safety and would create congestions preventing emergency services from accessing the site/area.
 - More social community spaces are needed.

- A museum with housing on top would be better.
- There would be a strain on community facilities.
- The process is flawed with poor consultation.
- Wind impacts would be a danger to pedestrians and cyclists.
- It would result in an increase in pollution.
- The building is poor design.
- The application has failed to take account of the refusal of permission for the adjacent proposed tower.
- There are no benefits to the scheme or public benefits.
- The development would damage the conservation area and listed railway arches.
- The development would result in poor public realm.
- The area should be turned into open space for the community. Preferably with oxygen generating trees for people to breathe the limited oxygen we have in this densely populated area.
- It would exacerbate parking problems.
- Construction and operational traffic from this scheme and the adjacent schemes will impact on local roads and Guy's Hospital.
- The development will have an adverse impact on people's health.
- The surrounding streets are too narrow to accommodate this scale of development and will lead to congestion that will affect safety.
- The development would lead to vehicle conflict on Weston Street/Melior Street.
- The applications fail to quantify the amount of construction traffic.
- The development doesn't meet the requirements of Southwark's Movement Plan.

385. Team London Bridge - There are a number of outstanding issues where further clarity is sought. Further information is required in terms of what the affordable workspace offer would be. The base of the building could be more active on St Thomas Street and the removal of the core and services to Fenning Street is unappealing. Team London Bridge consider that the public use of the building should extend to the first floor as well as the ground floor and that this should be clear to visitors.
386. It is acknowledged that the landscaping offer has improved with each iteration of the scheme and that the current proposal has strengthened the quality of its public realm and taken the opportunity to create a more mature landscape. Further greening of the building could take place and internal greening needs to have the quality of an indoor park.
387. Whilst it is encouraged that St Mungo's will continue to be involved in the landscape management the proposal would go wider in terms of place making, regeneration, reforestation and biodiversity. The applicant also needs to do more to demonstrate the appeal of the new public realm as a place to linger as well as a new route taking into account environmental conditions such as sun/light/wind.
388. In design terms further consideration should be given as to whether this is a Bermondsey building and there would be a more visible response to the Covid-19 pandemic and the future public expectations and requirements (such as

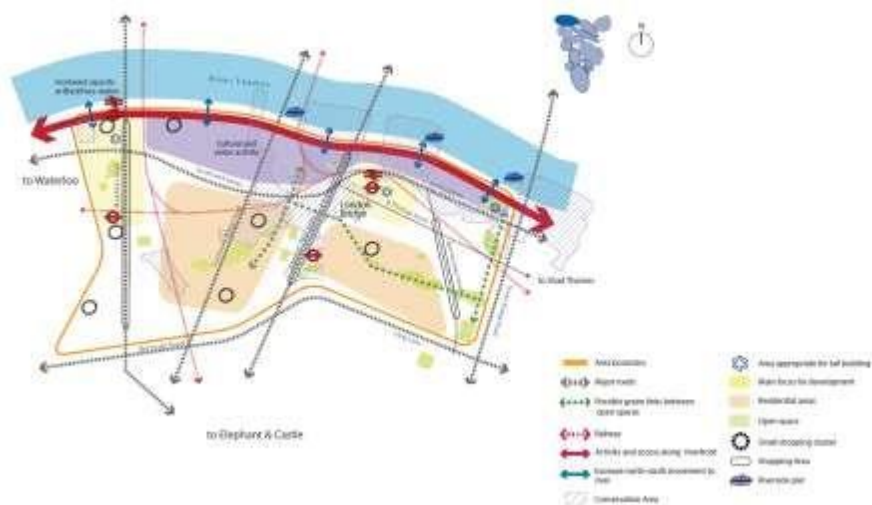
fresh air provision in the building, filtration systems, touchless systems, anti-viral coatings). There remain concerns that the servicing strategy and layby on Fenning Street will not be adequate for the development. Increased cycle parking should be provided and the commitments in the energy strategy should be secured to ensure implementation.

389. The Victorian Society - Unlike the other St Thomas Street schemes, no part of the site in question is included within the conservation area. The site does occupy a highly sensitive location, however, sandwiched between the Grade-II listed Railway Viaduct Arches, and the Bermondsey Street Conservation Area. Melior Street, and in particular the Slovak Church, would be negatively impacted by the construction of such a towering structure, especially given the proposals to move the building further south than the existing structure. The office block would become the dominant feature of the street, and remaining historical features, thrown into obscurity. It is noted that the existing building on the site is not overly attractive, but it is at least more sensitive in terms of scale than what is proposed. Any new use of the site should aim to mimic this height which references the lower heights of the conservation area.
390. Old Bermondsey Neighbourhood Forum (OBNF) – The OBNF have objected to the proposed development on the basis that the consultation process has not been meaningful with the main objection to the scheme being the proposed height and massing which is at odds with the site's surroundings.
391. The excessive height, massing and overdevelopment would impact on the character of the surrounding area and would seriously impact on the Bermondsey Street Conservation Area. There would be resultant impacts in terms of daylight/sunlight/overshadowing and winds. In terms of the height and massing of the building, it is clear that there is no policy support for this.
392. The site allocations set out in the NSP, (NSP50 and NSP51) were created with no consultation with the local community. They are also inconsistent and ambiguous. At the EiP on the New Southwark Plan, the Inspector acknowledged that there were issues with the allocations and concluded that a main modification was required to give them coherence and consistency. Until these modifications are made, there is no policy against which the redevelopment of St Thomas' Street can be considered. The modifications should be fully consulted upon and be the product of consultation. The Developer's Charter and St Thomas Street Framework should be abandoned and an alternative produced.
393. **Officer Response** – In terms of the consultation process undertaken by the developer in advance of the application being submitted, various meetings, telephone calls or virtual meetings have either been held with or offered to the OBNF this includes attendance at the public exhibitions on the 8th and 9th November 2019; a landscaping workshop on the 8th January 2020; a further public exhibition on the 14 January 2020; Zoom meeting on the 15 July 2020 that gave a full presentation of the application proposal; a socially distanced 'walk around' on 21st October 2020 and a final Zoom meeting on 7th June 2021. The applicant has also advised that further meetings were offered to the OBNF proposing a further workshop and that these would need to be held either with restricted numbers or virtually due to the Covid-19 pandemic and social

distancing restrictions however these were not accepted by the OBNF. 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.

394. In terms of the policy justification for the proposed development, this has been set out in full in the committee report. The site is located within the CAZ, District Town Centre, Opportunity Area and in an area of excellent public transport availability. It is a site that is considered appropriate for a tall building. There is therefore policy support under the adopted plan, for a development of this nature in this area. Concerns have also been raised by the OBNF expressing the view that the application should be deferred in order to allow for the draft main modifications arising from the NSP EiP on Site Allocations Policies NSP 50 & 51 to be published this month.
395. The 2011 Core Strategy which remains the adopted local development plan for this site until replaced by the New Southwark plan, sets out the policy approach to development in the Bankside, Borough London Bridge, Opportunity Area. Para 4.8 states :
396. “Working with local communities and land owners to deliver large scale development and improvements providing 1900 new homes, 665 affordable housing units and 25,000 jobs by 2026.”
397. Para 4.2 states :
398. “There will be excellently designed tall buildings in the area around London Bridge Station east of Borough High Street which will add interest to the skyline, raise the profile of Southwark and London and create new public spaces. We will set out in detail which sites will be sensitive and inappropriate for tall building through the Supplementary Planning Document/Opportunity Area Framework.”
399. Figure 12 illustrates the area for the “main focus of development” as being east of Borough High Street along St Thomas Street up to the junction with Bermondsey Street. This area is also identified as being “an area appropriate for tall buildings” .

Figure 12: Bankside, Borough and London Bridge



400. The existing and adopted plan policies have provided the basis for the development framework that was produced for the St Thomas Street sites and for granting planning permission at the Quill on St. Thomas Street and underpins the consideration of all planning applications coming forward in this site allocation in advance of the adoption of the NSP.
401. The NSP continues to identify this area and allocation NSP 51 as suitable for tall buildings, and continues to require that those tall buildings are of a high design quality and also identifies the need to create new public open space. So there is a continuity in policy approach. The EIP debate on this site did raise the issue of providing greater clarity on the height of buildings and amount of open space, which was acknowledged by officers at the EIP and it is proposed that additional detail is provided in the text to address this issue. There was no indication at the EIP or in subsequent correspondence with the inspectors that they have any issue with the substantive policy content of the NSP, which in respect of this site allocation was largely established in the 2011 plan and has been carried forward into the NSP.
402. The New London Plan is of course a more up to date adopted plan than the Southwark Core Strategy and generally where a new development plan is at odds with an older one the newer plan policies will take precedence. As set out in the main body of this report the New London Plan continues to promote growth in Opportunity Areas with good public transport access and sets out that boroughs should identify locations in which tall buildings will be appropriate and policies that ensure the design of those buildings are of a high quality.
403. The existing 2011 Core Strategy has already done that, and the principle approach to development and tall buildings for this site allocation is carried through in to the NSP. The NSP policies are in general conformity with the new London Plan policies, and neither the Mayor or the planning inspectors have raised any issues in respect of the soundness of this aspect of the plan.
404. The current adopted local plan policies therefore continue to provide a sound basis on which to make decisions in respect of this site, and no indication has been given by the inspector either during or after the EIP that he will require a fundamentally different approach to this site allocation.

405. The Planning Inspectorate have written to the Council on the 28th May in a post hearing letter and Appendix 1 which contains the list of main modifications to be made albeit that this list is not exhaustive. The letter confirms that there are no substantive issues of soundness for the New Southwark Plan (NSP) and it can now move to final consultation prior to adoption. The letter sets out areas of modification including: Affordable Housing, Traveller Sites and Student Housing. The Planning Policy Team are working through these and plan to consult on the modifications this year. It is then expected that the NSP would be adopted in early in 2022.
406. With the exception of the above modifications all the policies set out in the NSP were found to be sound including the suite of Design and Conservation Policies, the Tall Buildings Policy and the Important Borough Views Policy.
407. The relevant policies for the Becket House proposal were examined at a hearing relating to NSP 50 and 51. This is not unique to these NSP50 and 51, indeed every site allocation in the NSP was examined for possible modification or clarification. The Inspectors, in their letter, have not asked for NSP50 or NSP51 to be amended.
408. Whilst the Inspectors have not proposed any main modifications to this site allocation and have confirmed our plan is generally sound, we are going to propose some minor modifications to the allocation, which will identify that building heights reduce towards Bermondsey Street and establish a minimum open space requirement as per our planning framework. Both standards the Becket House proposal would meet.
409. A total of 12 responses supporting the development have been received recording support for the following reasons:
- The new park /garden on St Thomas Street
 - Encouraged to see affordable workspaces
 - This is the ideal site for redevelopment
 - Support for the emphasis on sustainability
 - Welcome employment opportunities
 - Attractive greenspaces at ground floor
 - Welcome the provision of a sustainable and healthy workplace
 - Green space is much needed
 - The development will add to the vibrancy of the area
 - The site is currently underutilised and unattractive

Consultation responses from external and statutory consultees

410. Environment Agency – No objections subject to conditions.
Response – Noted and agreed.
411. Greater London Authority - The principle of the redevelopment of the site for a significant new office development is fully supported, subject to confirmation that appropriate alternative accommodation has been identified for the Home

Office. Further details should be provided in relation to the public/community use of the lower levels; as well as how St Mungos have fed into the design of the public realm and would continue to be involved in the management of the public realm.

412. The design of the scheme is of high quality and would not result in harm to any of the identified LVMF views. In height and massing terms, the development is generally considered acceptable subject to points of clarification regarding public access. The development would give rise to some harm to the setting and significance of the Bermondsey Street Conservation Area towards the lower end of the less than substantial scale. This would need to be weighed against the public benefits of the scheme.
413. The energy strategy for the scheme is supported overall subject to investigating the potential for connection to the local heat network options and provision of further information on heat pumps.
414. Further details on how SuDS measures at the top of the drainage hierarchy will be included in the development, and how greenfield runoff rate will be achieved should be provided. Additional attenuation storage volume calculations, attenuation tank dimensions, and SuDS maintenance information should also be provided. Furthermore, the development does not meet the London Plan water consumption targets and should be revised accordingly.
415. The development would achieve an UGF of 0.3 which is welcomed. The development is generally supported in transport terms; however, further information is required in respect of the provision of electric charging points, access to the cycle stores, building line and public access.
416. Further discussion with the Council is required regarding the general approach to S106 pooling in the St Thomas Street area to deliver the Healthy Streets scheme, Legible London and Cycle hire capacity expansion. The Travel Plan, CLP and DSP should be submitted for approval by the Council, in consultation with TfL, prior to commencement, to be secured by condition/s106 planning obligation.
417. **Response** – It is noted that the principle of the development is supported and it is confirmed that The Home Office are continuing to seek alternative accommodation following the previously proposed move to an alternative premises in Newham. Additionally, it should be noted that the GLA based their Stage I response on the draft text of the New London Plan and that the wording of this policy was updated following the Examination in Public preceding adoption of the new plan in March 2021. The adopted wording of Policy S1 no longer makes reference to public function as set out in the Stage I response. Instead, the policy now states that Boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social infrastructure.
418. The Council has recently completed its own social infrastructure assessment (2019) as part of the New Southwark Plan submission, as required by the

London Plan Policy SP1. This assessment didn't identify the Home Office facility at Becket House as a need, a fact not challenged by the Home Office during consultation on the NSP. Furthermore, the Council recently completed the Examination in Public on the NSP and again the site allocation, which doesn't identify the immigration centre as social infrastructure, was not challenged by the Home Office or the GLA in response to the plan consultation.

419. London Plan 2021 Policy SP1 specifies that "Development proposals that would result in a loss of social infrastructure in an area of defined need as identified in the boroughs social infrastructure needs assessment required under part A shall only be permitted where;..". Given that the Home Office facility at Becket House is not considered 'social infrastructure' and hasn't been identified as such in the Borough's needs based assessment, officers are satisfied that the proposals are not contrary to London Plan Policy SP1 and that the relevant policy would not apply in this instance. The GLA have since confirmed that where a Borough has an up to date needs assessment that identifies areas of defined need, a proposal that would result in the loss of social infrastructure outside an area of defined need would not be contrary policy S1.
420. With regards to St Mungo's, the applicant is currently in discussions with St Mungo's in order to secure their continued involvement in the landscaped spaces and a MOU has been signed. Officers agree with the GLA that the impact on heritage assets and LVMF views would be less than substantial. The applicant has provided further information on energy and SUDS and this will be considered further by the GLA at Stage II, should the committee resolve to grant planning permission. The requested transport clarifications have been provided and whilst the Council fully support Transport for London in their request for funds towards the Healthy Streets scheme it is understood that the applicant and TfL are still discussing the method of calculation and final overall figure. This would also be confirmed at Stage II.
421. Guys and St Thomas NHS Trust - The Trust supports the redevelopment of the site however it must be brought forward sensitively with regard to the Trust's assets and operation. As such the Trust seek to engage and work collaboratively with the applicant on a number of matters. The Trust welcomes the provision of affordable workspace, adequate cycle parking and public realm improvements, providing engaging spaces and local amenities for its users.
422. The proposals will make the area more secure and well-lit, providing a safer space to travel through and spend time in for visitors and workers. The trust notes that various documents and strategies will be required either as conditions or as obligations within the S106 Agreement including a Demolition and Construction Environmental Management Plan, Construction Logistics Plan, Delivery and Servicing Management Plan and a Travel Plan and request that they are involved in their preparation and consulted on these documents.
423. The Trust must be considered as a key local receptor within these documents when assessing the impacts of both construction and operational traffic on their operations, to ensure that appropriate mitigation measures are put in place.

The Trust request that they are consulted during the preparation of these documents to enable them to comment. The Trust requests engagement on the Construction and Environmental Management to ensure that there would be no negative impacts on the hospital's own arrangements and operations and that an agreement is secured, prior to commencement, with the Trust that details the specific controls to the construction process to ensure the proper management of the development given the nature of the Trusts' activities.

424. **Response** – Noted and agreed, the documents referred to will be secured as part of the S106 Agreement and appropriate wording will be included on those obligations to ensure that the Trust are listed as a statutory consultee to ensure full and appropriate engagement.

425. Heathrow Airport – No safeguarding objections.
Response – Noted.

426. Historic England – Historic England have reviewed the potential views of the development from within the Tower of London (Views 1, 17 and 18) and taking account of existing and approved tall building developments in the London Bridge area (many of which are taller than the Becket House proposals), they consider this harm to be relatively minor. HE have also acknowledged that the proposed tall building would be located directly behind the Grade I listed St Paul's Cathedral in two Landmark Viewing Corridors (LVMF 2A.1 and 3A.1). Historic England have concluded, taking account of the existing and consented tall building developments that fall within these views, that it appears very unlikely that the proposed tall building at Becket House would have any noticeable visual impact in these views. Whilst Historic England have raised concerns about a number of tall buildings in Southwark in the past, they recognise that this site is not located within a conservation area and does not refer to any listed buildings. Furthermore, Historic England acknowledge that the development site is located in an area containing a number of built and consented tall buildings, and that the proposals appear to broadly reflect the Council's strategic policies. As such, Historic England do not object to the proposal.

Response – Officers note that Historic England do not object to the proposed development and that the impact on views would be relatively minor. The impact on the LVMF views would not be significantly impacted by the proposed development. In terms of views from within the Tower of London, Officers acknowledge that the proposal would appear briefly in the more sensitive views of the Queen's House from the White Tower (view #17) and from the Scaffold Site (view #18). From the entrance courtyard of the White Tower it would be glimpsed above the roofline of the Queen's House, although this would be through the trees and would be read as one of several tall buildings in the distance; whilst from the scaffold site it is just visible among the gables of the historic building's roof. In these views, whilst the sensitivity of the views is high, the visual intrusion is minor and the harm negligible.

427. Historic Royal Palaces - As guardians of the Tower of London World Heritage Site (WHS) on the north side of the Thames, Historic Royal Palaces' principal concern is the potential impact the proposed tall building might have on the setting of the WHS and on important views south-west from it, particularly the

views outwards from the Tower's Inner Ward. The *Townscape, Visual Impact and Built Heritage Assessment* for the redevelopment of Becket House (Environmental Assessment, Volume 2: Part 1), shows that the proposed 27 storey building would group visually with Capital House to the east of the Shard as seen from the Tower of London WHS and the north bastion of Tower Bridge. Although lower overall than Capital House, the proposal would be markedly taller than the general height of buildings along the South Bank opposite the Tower WHS, currently interrupted only by the existing tower of Guy's Hospital. It would thus contribute to the perception of a build-up in the height of new buildings in the vicinity of the Shard. Whilst the Becket House proposal in and of itself might not be considered objectionable, in the context of the other consented and pending proposals, it would contribute to the build-up from the east in the height of buildings adjacent to the Shard.

428. **Response** – The impact on views from within the Tower of London has been fully considered in the ES. Further assessment of the impact on these views has been undertaken by officers and by the GLA and Historic England as a result of consultation. As set out in the report, the proposal would appear briefly in the more sensitive views of the Queen's House from the White Tower (view #17) and from the Scaffold Site (view #18). In these views, whilst the sensitivity of the views is high, the visual intrusion is minor and the harm negligible.
429. The London Borough of Tower Hamlets - Concerns have been raised regarding the impact of the development on some protected views including View 17 and 18 from within the Tower of London and clarifications on Views 11 and 12 (Royal Mint and Tower Gateway).
Response - The development is discernible within the backdrops to the Tower of London and is visible within several of the protected panoramas. However, Officers consider that its appearance causes no or negligible harm, preserving these sensitive views.
430. London Underground – No comment.
Response – Noted.
431. Metropolitan Police – No objection subject to appropriate conditions.
Response – Noted.
432. NATS – No objections.
Response – Noted.
433. Natural England – No objections.
Response – Noted.
434. Network Rail - Given the proximity of the proposed development to Network Rail's infrastructure, Network Rail strongly recommends the developer contacts Network Rail's Asset Protection and Optimisation (ASPRO) team prior to works commencing. The applicant will need to demonstrate to our Asset Protection team that there is no risk of glare impacting driver's ability to see signals as well as provide design details for the use of the Tower Cranes and scaffolding during construction. Network Rail's ASPRO team will ensure the works can be carried out safely and not pose a risk to Network Rail's Infrastructure. The applicant may also be required to enter into an Asset Protection Agreement to

get the required resource and expertise on-board to enable approval of detailed works. Further informatives are recommended.

Response – Noted, the relevant informatives will be added to any consent issued.

435. Thames Water – Recommend conditions and informatives in addition to concerns regarding proximity of a sewage pumping station.

Response - Thames Water have recommended various conditions and informatives which will be added to any consent issued. Concerns were raised about the proximity of the development to a sewage pumping station and as such Thames Water have recommended a specific informative to cover this issue and this will be attached to any consent issued.

436. Transport for London – Transport for London consider the proposed car parking to be acceptable given the central London location of the site and the proximity to London Bridge Station subject to the space being provided with an electric vehicle charging point. Cycle parking would be compliant with the London Plan however further consideration should be given to the access to cycle parking area to reduce potential queuing at the lifts or staircases within the development. As with the other development proposals on St Thomas Street, a s106 contribution should be sought to deliver the Healthy Streets scheme

437. TfL consider 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 loading bay on Fenning Street operates within capacity. Bus capacity in the London Bridge area on the routes and at the times likely to be used by office workers is adequate.

438. 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.

Response – The applicant is in further discussions with TfL regarding the final figure and method of calculation for the Healthy Streets contribution and this will be finalised as part of any Stage II referral process. The developer has provided additional information to address the access to the cycle parking area and the S106 agreement would secure the various plans and strategies as recommended by TfL.

Community impact and equalities assessment

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

441. 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.
442. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
443. 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).
444. Becket House is currently occupied by the Home Office as an Immigration Reporting Centre with associated offices. Subject to the terms of its lease, there is nothing preventing the Home Office vacating the existing premises at a time of its choosing. In planning terms, there is nothing preventing another office occupier taking occupation of the existing building.
445. The Home Office is itself subject to the PSED. There are existing Immigration Reporting Centres in Hounslow and Croydon – all of which are/will be accessible by public transport and so the loss of the centre at Becket House will not prevent access to a centre. In addition, the Home Office plans to open a further centre in Docklands.
446. There is nothing in the proposal that contributes to the discrimination, harassment, victimisation or any other conduct that is prohibited by or under

this Act. The existence or absence of the current Home Office facility at Becket House does not, and does not contribute to, the said discrimination, harassment or victimisation.

447. There will be access to other centres in London as set out above. Accordingly, there is no impact on the equality of opportunity for those currently using Becket House and others requiring access to an Immigration Reporting Centre in London. Nationally, the centres are provided at regional level meaning that across the country a degree of travel is required, including in areas that lack the comprehensive public transport system that is available in London.

Human rights implications

448. 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.
449. This application has the legitimate aim of providing new offices. 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

450. 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.
451. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

Positive and proactive engagement: summary table

Was the pre-application service used for this application? YES

If the pre-application service was used for this application, was the advice given followed? YES

Was the application validated promptly? YES

If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval? YES

To help secure a timely decision, did the case officer submit their recommendation in advance of

the agreed Planning Performance Agreement date?

YES

CONCLUSION

452. The intention to redevelop the Becket House site for a commercial scheme within a tall building is one that is supported by current and emerging planning policy. The substantial uplift in jobs and employment opportunities through the creation of high quality offices and commercial floorspace in addition to new retail opportunities that will enliven the streets whilst supporting the functions of the London Bridge District Town Centre, is consistent with the NSP site allocation and the objectives for the Opportunity Area.
453. The development would result in a significant increase in commercial floorspace on a central, sustainable, highly connected brownfield site. The development has the potential to provide up to 1,900 jobs on a site that benefits from the highest levels of public transport availability. The provision of extensive and high quality cyclist facilities including parking, showering facilities, changing rooms, ironing rooms and bike repair stations will serve to encourage sustainable forms of transport. The provision of much needed affordable workspace will secure discounted workspace and facilities for micro to medium sized enterprises and is a benefit of the scheme. The proposed Affordable Workspace Offer meets the policy requirement in terms of quantum of space and various components of the offer will provide a meaningful choice and significant discount to potential users with the auditorium, basement studios and the ground floor shared working space being offered for free which is a significant benefit. The Council's Local Economy Team have reviewed the offer and are supportive of the proposal.
454. The surrounding townscape is varied with taller buildings to the west and north such as Guys Hospital Tower and The Shard as well as the consented Capital House development which would rise to 39 storeys on the immediately neighbouring site. Building heights then step down significantly towards Bermondsey Street and to the south. As such the proposed building, which would be of a significant scale, would directly contrast with the lower scale buildings located to the east and south, particularly those within the Bermondsey Street Conservation Area. This site, along with the other St Thomas Street sites, including the Vinegar Yard development which is with the Mayor for determination, therefore has an important role to play in managing this transition in scale between the taller buildings to the west and the lower rise buildings to the east. Having reviewed the information presented as part of the Townscape, Visual Impact and Built Heritage Assessment, officers are of the view that the proposed building is successful in its role in managing that change in scale and character.
455. It should be noted that the site is not located within a conservation area however it is acknowledged that it sits close to the boundary with the Bermondsey Street Conservation Area and will impact on its setting. The proposed building will be visible in some views from within the conservation area however the visibility of the proposed building from within the conservation area is not considered to cause substantial harm and the less than substantial harm would be significantly outweighed by the public benefits of redeveloping the site including the provision of high quality architecture, significant new

employment provision, affordable workspace, new retail opportunities, new pedestrian linkages with improved connectivity and a significant new public realm.

456. The development would bring forward significant public realm benefits including a generous pocket park that would provide improved pedestrian and visual linkages between St Thomas Street and Melior Street whilst opening up views of the church. This park would be well landscaped and planted and would provide a much needed green space in a central location that would be a benefit enjoyed by residents, workers and visitors. The proposed pocket park is considered to be a suitable and high quality replacement for the Melior Street Garden, being both more generous in size and more visible given its location between St Thomas Street and Melior Street. It should also be noted that the pocket park would assist the development in achieving an Urban Greening Factor of 0.3 which would be compliant with London Plan requirements.
457. The development would achieve Carbon Zero status through a combination of an in lieu payment and a 55.1% carbon reduction on site. The on-site carbon reduction of 55.1% alongside the scheme being expected to achieve BREEAM Outstanding will result in one of the most energy efficient and sustainable buildings in London.
458. Developments of this size and nature have the potential for significant environmental impacts and therefore an Environmental Statement has been submitted. The impacts identified in the Environmental Statement have been assessed and taken into account and should be considered in determining the application. It is noted that there would be significant impacts on daylight and sunlight to a small number of properties, most notably Our Lady of La Salette and St Joseph Church as well as properties 6-12 Melior Street/36 Snowfields and 48-50 Weston Street and 43 Snowfields. On balance, given the small number of properties affected and the site specific circumstances leading to those impacts, the benefits of the proposed scheme are considered to outweigh the potential harm and as such the impacts are considered acceptable.
459. The application is considered to be in compliance with the development plan, and emerging documents, when read as a whole, and It is therefore recommended that planning permission be granted, subject to conditions, the timely completion of a S106 Agreement and referral to the Mayor of London.

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:

APPENDICES

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

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Terence McLellan	
Version	Final	
Dated	16.06.21	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		7 th July 2021

Appendix 1 and Appendix 2:

Consultation undertaken

Site notice date:

Press notice date: 18.02.2021

Case officer site visit date:

Neighbour consultation letters sent:

Consultation Letters to Neighbours and Local Groups:

Recipient Address:

Date Letter Sent:

- Flat 6, 64 Weston Street, London
- Flat 6, 64 Weston Street, London
- Flat 1, 62 Weston Street, London
- Flat 1, 62 Weston Street, London
- 2 Tyers Estate, Bermondsey Street, London
- 2 Tyers Estate, Bermondsey Street, London
- Flat 4, 72 Weston Street, London
- Flat 4, 72 Weston Street, London
- 19 Tyers Estate, Bermondsey Street, London
- 19 Tyers Estate, Bermondsey Street, London
- 16 Tyers Estate, Bermondsey Street, London
- 16 Tyers Estate, Bermondsey Street, London
- 6 Porlock Street, London, Southwark
- 6 Porlock Street, London, Southwark
- 10 Guy Street, London, Southwark
- 10 Guy Street, London, Southwark
- 84 Crosby Row, London, Southwark
- 84 Crosby Row, London, Southwark
- 82 Crosby Row, London, Southwark
- 82 Crosby Row, London, Southwark
- 64 Crosby Row, London, Southwark
- 64 Crosby Row, London, Southwark
- 62 Crosby Row, London, Southwark
- 62 Crosby Row, London, Southwark
- 50 Crosby Row, London, Southwark
- 50 Crosby Row, London, Southwark
- 48 Crosby Row, London, Southwark
- 48 Crosby Row, London, Southwark
- London Bridge Station, 63 St Thomas Street, London
- London Bridge Station, 63 St Thomas Street, London
- London Bridge Station, 39 St Thomas Street, London
- London Bridge Station, 39 St Thomas Street, London
- Unit 137, London Bridge Station, London Bridge Street

- Unit 137, London Bridge Station, London Bridge Street
- Unit 108, London Bridge Station, London Bridge Street
- Unit 108, London Bridge Station, London Bridge Street
- Unit 102, London Bridge Station, London Bridge Street
- Unit 102, London Bridge Station, London Bridge Street
- Apartment 4, 88A Tooley Street, London
- Apartment 4, 88A Tooley Street, London
- Flat 10, Marklake Court, 95 Weston Street
- Flat 10, Marklake Court, 95 Weston Street
- Flat 4, Marklake Court, 95 Weston Street
- Flat 4, Marklake Court, 95 Weston Street
- Flat 1, 80 Bermondsey Street, London
- Flat 1, 80 Bermondsey Street, London
- Apartment 1, 118 Tooley Street, London
- Apartment 1, 118 Tooley Street, London
- 123 Snowsfields, London, Southwark
- 123 Snowsfields, London, Southwark
- Arch 5, Crucifix Lane, London
- Arch 5, Crucifix Lane, London
- Apartment 31, 36 Snowsfields, London
- Apartment 31, 36 Snowsfields, London
- Apartment 4, 36 Snowsfields, London
- Apartment 4, 36 Snowsfields, London
- Second Floor West, 136-148 Tooley Street, London
- Second Floor West, 136-148 Tooley Street, London
- Site Office, The Shard, 32 London Bridge Street
- Site Office, The Shard, 32 London Bridge Street
- Bloomfield Clinic, Guys Hospital, St Thomas Street
- Bloomfield Clinic, Guys Hospital, St Thomas Street
- Service Entrance, The Shard, 31 St Thomas Street
- Service Entrance, The Shard, 31 St Thomas Street
- Level 24, The Shard, 32 London Bridge Street
- Level 24, The Shard, 32 London Bridge Street
- Level 16, The Shard, 32 London Bridge Street
- Level 16, The Shard, 32 London Bridge Street
- Level 5, The Shard, 32 London Bridge Street
- Level 5, The Shard, 32 London Bridge Street
- Apartment 5, 36 Snowsfields, London
- Apartment 5, 36 Snowsfields, London
- First To Third Floors And Attic, 128 Tooley Street, London
- First To Third Floors And Attic, 128 Tooley Street, London
- Flat 3, 40 Snowsfields, London
- Flat 3, 40 Snowsfields, London
- Level 4, The Shard, 32 London Bridge Street
- Level 4, The Shard, 32 London Bridge Street

- Basement And Ground Floor, 130-132 Tooley Street, London
- Basement And Ground Floor, 130-132 Tooley Street, London
- Medical School, Southwark Wing Guys Hospital, Great Maze Pond
- Medical School, Southwark Wing Guys Hospital, Great Maze Pond
- Room 309 West Wing Nurses Home, Guys Hospital, Great Maze Pond
- Room 309 West Wing Nurses Home, Guys Hospital, Great Maze Pond
- First Floor, Natraj The Tannery, Bermondsey Street
- First Floor, Natraj The Tannery, Bermondsey Street
- Flat 6, Kamen House, 17-21 Magdalen Street
- Flat 6, Kamen House, 17-21 Magdalen Street
- Fourth Floor, Shiva The Tannery, Bermondsey Street
- Fourth Floor, Shiva The Tannery, Bermondsey Street
- Meeting Room 1 Fourth Floor, 39-45 Bermondsey Street, London
- Meeting Room 1 Fourth Floor, 39-45 Bermondsey Street, London
- First To Third And Part Fourth And Fifth Floors And Meeting Room One On Fourth Floor, 39-45 Bermondsey Street, London
- First To Third And Part Fourth And Fifth Floors And Meeting Room One On Fourth Floor, 39-45 Bermondsey Street, London
- Part Ground Floor, 148 Tooley Street, London
- Part Ground Floor, 148 Tooley Street, London
- Units 3 And 4, The Grain Stores, 70 Weston Street
- Units 3 And 4, The Grain Stores, 70 Weston Street
- Third Floor, 18-20 Crucifix Lane, London
- Third Floor, 18-20 Crucifix Lane, London
- 13 Crucifix Lane, London, Southwark
- 13 Crucifix Lane, London, Southwark
- Railway Arch 899, Holyrood Street, London
- Railway Arch 899, Holyrood Street, London
- 51 Oxford Drive, London, Southwark
- 51 Oxford Drive, London, Southwark
- 31 Oxford Drive, London, Southwark
- 31 Oxford Drive, London, Southwark
- 17 Oxford Drive, London, Southwark
- 17 Oxford Drive, London, Southwark
- 16 Oxford Drive, London, Southwark
- 16 Oxford Drive, London, Southwark

- 15 Oxford Drive, London, Southwark
- 15 Oxford Drive, London, Southwark
- 10 Oxford Drive, London, Southwark
- 10 Oxford Drive, London, Southwark
- 9 Oxford Drive, London, Southwark
- 9 Oxford Drive, London, Southwark
- 1 Oxford Drive, London, Southwark
- 1 Oxford Drive, London, Southwark
- Flat 1, Lion Court, 28 Magdalen Street
- Flat 1, Lion Court, 28 Magdalen Street
- 133 Guinness Court, Snowsfields, London
- 133 Guinness Court, Snowsfields, London
- 96 Guinness Court, Snowsfields, London
- 96 Guinness Court, Snowsfields, London
- 84 Guinness Court, Snowsfields, London
- 84 Guinness Court, Snowsfields, London
- 41 Guinness Court, Snowsfields, London
- 41 Guinness Court, Snowsfields, London
- 33 Bridgewalk Heights, 80 Weston Street, London
- 33 Bridgewalk Heights, 80 Weston Street, London
- 18 Bridgewalk Heights, 80 Weston Street, London
- 18 Bridgewalk Heights, 80 Weston Street, London
- 7 Bridgewalk Heights, 80 Weston Street, London
- 7 Bridgewalk Heights, 80 Weston Street, London
- Flat 7, 48 Kipling Street, London
- Flat 7, 48 Kipling Street, London
- Flat 4, 48 Kipling Street, London
- Flat 4, 48 Kipling Street, London
- 38 Snowsfields, London, Southwark
- 38 Snowsfields, London, Southwark
- 94 Snowsfields, London, Southwark
- 94 Snowsfields, London, Southwark
- 67 Lockyer Estate, Kipling Street, London
- 67 Lockyer Estate, Kipling Street, London
- 14 Hamilton Square, Kipling Street, London
- 14 Hamilton Square, Kipling Street, London
- Flat 21, Sarah Swift House, Kipling Street
- Flat 21, Sarah Swift House, Kipling Street
- Flat 14, Sarah Swift House, Kipling Street
- Flat 14, Sarah Swift House, Kipling Street
- 8-9 Snowsfields, London, Southwark
- 8-9 Snowsfields, London, Southwark
- Flat 1, 79 Bermondsey Street, London
- Flat 1, 79 Bermondsey Street, London
- Flat 3, 11 Porlock Street, London
- Flat 3, 11 Porlock Street, London

- 8 Crucifix Lane, London, Southwark
- 8 Crucifix Lane, London, Southwark
- Flat 10, 64 Weston Street, London
- Flat 10, 64 Weston Street, London
- 5 Tyers Estate, Bermondsey Street, London
- 5 Tyers Estate, Bermondsey Street, London
- Flat 5, 72 Weston Street, London
- Flat 5, 72 Weston Street, London
- First Floor, 77 Weston Street, London
- First Floor, 77 Weston Street, London
- 63 Tyers Estate, Bermondsey Street, London
- 63 Tyers Estate, Bermondsey Street, London
- 61 Tyers Estate, Bermondsey Street, London
- 61 Tyers Estate, Bermondsey Street, London
- 46 Tyers Estate, Bermondsey Street, London
- 46 Tyers Estate, Bermondsey Street, London
- 41 Tyers Estate, Bermondsey Street, London
- 41 Tyers Estate, Bermondsey Street, London
- 39 Tyers Estate, Bermondsey Street, London
- 39 Tyers Estate, Bermondsey Street, London
- 30 Tyers Estate, Bermondsey Street, London
- 30 Tyers Estate, Bermondsey Street, London
- 27 Tyers Estate, Bermondsey Street, London
- 27 Tyers Estate, Bermondsey Street, London
- 14 Tyers Estate, Bermondsey Street, London
- 14 Tyers Estate, Bermondsey Street, London
- 68 Crosby Row, London, Southwark
- 68 Crosby Row, London, Southwark
- 56 Crosby Row, London, Southwark
- 56 Crosby Row, London, Southwark
- Unit 262, London Bridge Station, London Bridge Street
- Unit 262, London Bridge Station, London Bridge Street
- Unit 126, London Bridge Station, London Bridge Street
- Unit 126, London Bridge Station, London Bridge Street
- Unit 121, London Bridge Station, London Bridge Street
- Unit 121, London Bridge Station, London Bridge Street
- London Bridge Station, London Bridge Street, London
- London Bridge Station, London Bridge Street, London
- Flat 26, Marklake Court, 95 Weston Street
- Flat 26, Marklake Court, 95 Weston Street
- Flat 23, Marklake Court, 95 Weston Street
- Flat 23, Marklake Court, 95 Weston Street
- Flat 18, Marklake Court, 95 Weston Street
- Flat 18, Marklake Court, 95 Weston Street
- Flat 8, Marklake Court, 95 Weston Street
- Flat 8, Marklake Court, 95 Weston Street

- Unit 315, Shard Arcade, Joiner Street
- Unit 315, Shard Arcade, Joiner Street
- Flat 1, 123 Snowsfields, London
- Flat 1, 123 Snowsfields, London
- Apartment 2, 8 Melior Street, London
- Apartment 2, 8 Melior Street, London
- Apartment 21, 36 Snowsfields, London
- Apartment 21, 36 Snowsfields, London
- First Floor East, 136-148 Tooley Street, London
- First Floor East, 136-148 Tooley Street, London
- Railway Arch 892, Holyrood Street, London
- Railway Arch 892, Holyrood Street, London
- Second Floor New City Court, Guys Hospital, St Thomas Street
- Second Floor New City Court, Guys Hospital, St Thomas Street
- Level 15, The Shard, 32 London Bridge Street
- Level 15, The Shard, 32 London Bridge Street
- Level 8, The Shard, 32 London Bridge Street
- Level 8, The Shard, 32 London Bridge Street
- Apartment 6, The Shard, 31 St Thomas Street
- Apartment 6, The Shard, 31 St Thomas Street
- Arch 874 And Arch 875, 41 Barnham Street, London
- Arch 874 And Arch 875, 41 Barnham Street, London
- Flat 14, More Copper House, 14-16 Magdalen Street
- Flat 14, More Copper House, 14-16 Magdalen Street
- Flat 3 Counting House, Guys Hospital, Great Maze Pond
- Flat 3 Counting House, Guys Hospital, Great Maze Pond
- Flat 1, 1 Shand Street, London
- Flat 1, 1 Shand Street, London
- Swimming Pool, Wolfson House, 49 Weston Street
- Swimming Pool, Wolfson House, 49 Weston Street
- Student Accommodation, Wolfson House, 49 Weston Street
- Student Accommodation, Wolfson House, 49 Weston Street
- Flat 2, 100 Tooley Street, London
- Flat 2, 100 Tooley Street, London
- Unit 21, 54 Bermondsey Street, London
- Unit 21, 54 Bermondsey Street, London
- Unit 14, 52 Bermondsey Street, London
- Unit 14, 52 Bermondsey Street, London
- Ganesh, The Tanneries, 55 Bermondsey Street
- Ganesh, The Tanneries, 55 Bermondsey Street
- Part Fifth Floor, 39-45 Bermondsey Street, London
- Part Fifth Floor, 39-45 Bermondsey Street, London

- 3 Raquel Court, 147 Snowsfields, London
- 3 Raquel Court, 147 Snowsfields, London
- Unit 1, 72 Weston Street, London
- Unit 1, 72 Weston Street, London
- Flat 3, 8 Tyers Gate, London
- Flat 3, 8 Tyers Gate, London
- First Floor And Second Floor, 130-132 Tooley Street,
- First Floor And Second Floor, 130-132 Tooley Street,
- Bermondsey Village Hall, Kirby Grove, London
- Bermondsey Village Hall, Kirby Grove, London
- Living Accommodation, 88 Tooley Street, London
- Living Accommodation, 88 Tooley Street, London
- First Floor, 90A Tooley Street, London
- First Floor, 90A Tooley Street, London
- Unit 7, Railway Arches 881 882 882W, Holyrood Street
- Unit 7, Railway Arches 881 882 882W, Holyrood Street
- Unit 123, London Bridge Station, London Bridge Street
- Unit 123, London Bridge Station, London Bridge Street
- 15 Guinness Court, Snowsfields, London
- 15 Guinness Court, Snowsfields, London
- Flat 4, St Lukes Court, 124-126 Tooley Street
- Flat 4, St Lukes Court, 124-126 Tooley Street
- First Floor, 134 Tooley Street, London
- First Floor, 134 Tooley Street, London
- Ground Floor, 82-86 Bermondsey Street, London
- Ground Floor, 82-86 Bermondsey Street, London
- 8 Bridgewalk Heights, 80 Weston Street, London
- 8 Bridgewalk Heights, 80 Weston Street, London
- 62-64 Weston Street, London, Southwark
- 62-64 Weston Street, London, Southwark
- 13 Tyers Estate, Bermondsey Street, London
- 13 Tyers Estate, Bermondsey Street, London
- 43 Barnham Street, London, Southwark
- 43 Barnham Street, London, Southwark
- 38 Oxford Drive, London, Southwark
- 38 Oxford Drive, London, Southwark
- Apartment 28, 36 Snowsfields, London
- Apartment 28, 36 Snowsfields, London
- 88 Guinness Court, Snowsfields, London
- 88 Guinness Court, Snowsfields, London
- Flat 1, St Lukes Court, 124-126 Tooley Street
- Flat 1, St Lukes Court, 124-126 Tooley Street
- Ground Floor, 16 Crucifix Lane, London
- Ground Floor, 16 Crucifix Lane, London
- Flat 5, 54 Weston Street, London
- Flat 5, 54 Weston Street, London

- 52 Guinness Court, Snowsfields, London
- 52 Guinness Court, Snowsfields, London
- 14 Ship And Mermaid Row, London, Southwark
- 14 Ship And Mermaid Row, London, Southwark
- Third Floor And Fourth Floor, 130-132 Tooley Street,
- Third Floor And Fourth Floor, 130-132 Tooley Street,
- Flat 4, More Copper House, 14-16 Magdalen Street
- Flat 4, More Copper House, 14-16 Magdalen Street
- London Bridge Station, 6 Bermondsey Street, London
- London Bridge Station, 6 Bermondsey Street, London
- Flat 12, Marklake Court, 95 Weston Street
- Flat 12, Marklake Court, 95 Weston Street
- Level 13, The Shard, 32 London Bridge Street
- Level 13, The Shard, 32 London Bridge Street
- 105 Guinness Court, Snowsfields, London
- 105 Guinness Court, Snowsfields, London
- 70 Lockyer Estate, Kipling Street, London
- 70 Lockyer Estate, Kipling Street, London
- Flat 14, 70 Weston Street, London
- Flat 14, 70 Weston Street, London
- 12 Oxford Drive, London, Southwark
- 12 Oxford Drive, London, Southwark
- 60 Tyers Estate, Bermondsey Street, London
- 60 Tyers Estate, Bermondsey Street, London
- 25 Tyers Estate, Bermondsey Street, London
- 25 Tyers Estate, Bermondsey Street, London
- Unit 2, 7-13 Melior Street, London
- Unit 2, 7-13 Melior Street, London
- Part Third Floor West, 136-148 Tooley Street, London
- Part Third Floor West, 136-148 Tooley Street, London
- Unit 3, Railway Arches 889 And 890, Holyrood Street
- Unit 3, Railway Arches 889 And 890, Holyrood Street
- Unit 314, Shard Arcade, Joiner Street
- Unit 314, Shard Arcade, Joiner Street
- Apartment 3, 88A Tooley Street, London
- Apartment 3, 88A Tooley Street, London
- Flat 19, Marklake Court, 95 Weston Street
- Flat 19, Marklake Court, 95 Weston Street
- London Bridge Station, 69 St Thomas Street, London
- London Bridge Station, 69 St Thomas Street, London
- London Bridge Station, 82 Tooley Street, London
- London Bridge Station, 82 Tooley Street, London
- Unit 131, London Bridge Station, London Bridge Street
- Unit 131, London Bridge Station, London Bridge Street
- Unit 101, London Bridge Station, London Bridge Street
- Unit 101, London Bridge Station, London Bridge Street

- Flat 5, 123 Snowsfields, London
- Flat 5, 123 Snowsfields, London
- Flat 12, 70 Weston Street, London
- Flat 12, 70 Weston Street, London
- Flat 6, 72 Weston Street, London
- Flat 6, 72 Weston Street, London
- Flat 6, 4B Tyers Gate, London
- Flat 6, 4B Tyers Gate, London
- Flat 3, 79 Bermondsey Street, London
- Flat 3, 79 Bermondsey Street, London
- 14 Oxford Drive, London, Southwark
- 14 Oxford Drive, London, Southwark
- 11 Oxford Drive, London, Southwark
- 11 Oxford Drive, London, Southwark
- 16 Snowsfields, London, Southwark
- 16 Snowsfields, London, Southwark
- 140 Guinness Court, Snowsfields, London
- 140 Guinness Court, Snowsfields, London
- 128 Guinness Court, Snowsfields, London
- 128 Guinness Court, Snowsfields, London
- 9 Tyers Estate, Bermondsey Street, London
- 9 Tyers Estate, Bermondsey Street, London
- 71 Lockyer Estate, Kipling Street, London
- 71 Lockyer Estate, Kipling Street, London
- Flat 3, Lion Court, 12 Shand Street
- Flat 3, Lion Court, 12 Shand Street
- Flat 31, Lion Court, 12 Shand Street
- Flat 31, Lion Court, 12 Shand Street
- 31 Hamilton Square, Kipling Street, London
- 31 Hamilton Square, Kipling Street, London
- 23 Hamilton Square, Kipling Street, London
- 23 Hamilton Square, Kipling Street, London
- 83 Guinness Court, Snowsfields, London
- 83 Guinness Court, Snowsfields, London
- 26 Tyers Estate, Bermondsey Street, London
- 26 Tyers Estate, Bermondsey Street, London
- 15 Tyers Estate, Bermondsey Street, London
- 15 Tyers Estate, Bermondsey Street, London
- 9 Guinness Court, Snowsfields, London
- 9 Guinness Court, Snowsfields, London
- 60 Guinness Court, Snowsfields, London
- 60 Guinness Court, Snowsfields, London
- 34 Guinness Court, Snowsfields, London
- 34 Guinness Court, Snowsfields, London
- 29 Guinness Court, Snowsfields, London
- 29 Guinness Court, Snowsfields, London

- 20 Guinness Court, Snowsfields, London
- 20 Guinness Court, Snowsfields, London
- 27 Bridgewalk Heights, 80 Weston Street, London
- 27 Bridgewalk Heights, 80 Weston Street, London
- 16 Guy Street, London, Southwark
- 16 Guy Street, London, Southwark
- 66 Weston Street, London, Southwark
- 66 Weston Street, London, Southwark
- Unit 5, Shard Arcade, Joiner Street
- Unit 5, Shard Arcade, Joiner Street
- Flat 18, Sarah Swift House, Kipling Street
- Flat 18, Sarah Swift House, Kipling Street
- Flat 15, Sarah Swift House, Kipling Street
- Flat 15, Sarah Swift House, Kipling Street
- Flat 10, Sarah Swift House, Kipling Street
- Flat 10, Sarah Swift House, Kipling Street
- Apartment 23, 36 Snowsfields, London
- Apartment 23, 36 Snowsfields, London
- 16 Crosby Row, London, Southwark
- 16 Crosby Row, London, Southwark
- Flat 8, 40 Snowsfields, London
- Flat 8, 40 Snowsfields, London
- Flat 4, 42 Snowsfields, London
- Flat 4, 42 Snowsfields, London
- 50 Oxford Drive, London, Southwark
- 50 Oxford Drive, London, Southwark
- Level 9, The Shard, 32 London Bridge Street
- Level 9, The Shard, 32 London Bridge Street
- Unit 4B Arch 887, Railway Arches 888, Holyrood Street
- Unit 4B Arch 887, Railway Arches 888, Holyrood Street
- Flat 6, More Copper House, 14-16 Magdalen Street
- Flat 6, More Copper House, 14-16 Magdalen Street
- Rooms 1 Second Floor, 3-5 Hardwidge Street, London
- Rooms 1 Second Floor, 3-5 Hardwidge Street, London
- Flat 29, Kamen House, 17-21 Magdalen Street
- Flat 29, Kamen House, 17-21 Magdalen Street
- 33 Bermondsey Street, London, Southwark
- 33 Bermondsey Street, London, Southwark
- Ground Floor, 40 Bermondsey Street, London
- Ground Floor, 40 Bermondsey Street, London
- 10 Raquel Court, 147 Snowsfields, London
- 10 Raquel Court, 147 Snowsfields, London
- Basement And Ground Floor Rear, 134 Tooley Street,
London
- Basement And Ground Floor Rear, 134 Tooley Street,
London

- 42-42A Snowsfields, London, Southwark
- 42-42A Snowsfields, London, Southwark
- Second Floor, Shand House, 14-20 Shand Street
- Second Floor, Shand House, 14-20 Shand Street
- Ground Floor, Shand House, 14-20 Shand Street
- Ground Floor, Shand House, 14-20 Shand Street
- Unit 1, The Grain Stores, 70 Weston Street
- Unit 1, The Grain Stores, 70 Weston Street
- Flat 7, 38 Snowsfields, London
- Flat 7, 38 Snowsfields, London
- Flat 6, 38 Snowsfields, London
- Flat 6, 38 Snowsfields, London
- Flat 5, 38 Snowsfields, London
- Flat 5, 38 Snowsfields, London
- 11 Crucifix Lane, London, Southwark
- 11 Crucifix Lane, London, Southwark
- Railway Arches 897 And 898, Holyrood Street, London
- Railway Arches 897 And 898, Holyrood Street, London
- Unit 4A, Railway Arches 887, Holyrood Street
- Unit 4A, Railway Arches 887, Holyrood Street
- Basement And Ground Floor, 8 Holyrood Street, London
- Basement And Ground Floor, 8 Holyrood Street, London
- 19 Snowsfields, London, Southwark
- 19 Snowsfields, London, Southwark
- St Pauls Vicarage, 54 Kipling Street, London
- St Pauls Vicarage, 54 Kipling Street, London
- 100 Tooley Street, London, Southwark
- 100 Tooley Street, London, Southwark
- 52 Oxford Drive, London, Southwark
- 52 Oxford Drive, London, Southwark
- 44 Oxford Drive, London, Southwark
- 44 Oxford Drive, London, Southwark
- 27 Oxford Drive, London, Southwark
- 27 Oxford Drive, London, Southwark
- 8 Oxford Drive, London, Southwark
- 8 Oxford Drive, London, Southwark
- Flat 21, Lion Court, 12 Shand Street
- Flat 21, Lion Court, 12 Shand Street
- Flat 18, Lion Court, 12 Shand Street
- Flat 18, Lion Court, 12 Shand Street
- Flat 15, Lion Court, 12 Shand Street
- Flat 15, Lion Court, 12 Shand Street
- Flat 8, Lion Court, 12 Shand Street
- Flat 8, Lion Court, 12 Shand Street
- 147 Guinness Court, Snowsfields, London
- 147 Guinness Court, Snowsfields, London

- 139 Guinness Court, Snowsfields, London
- 139 Guinness Court, Snowsfields, London
- 130 Guinness Court, Snowsfields, London
- 130 Guinness Court, Snowsfields, London
- 121 Guinness Court, Snowsfields, London
- 121 Guinness Court, Snowsfields, London
- 75 Guinness Court, Snowsfields, London
- 75 Guinness Court, Snowsfields, London
- Flat 13, St Lukes Court, 124-126 Tooley Street
- Flat 13, St Lukes Court, 124-126 Tooley Street
- Flat 3, St Lukes Court, 124-126 Tooley Street
- Flat 3, St Lukes Court, 124-126 Tooley Street
- 118 Guinness Court, Snowsfields, London
- 118 Guinness Court, Snowsfields, London
- 111 Guinness Court, Snowsfields, London
- 111 Guinness Court, Snowsfields, London
- 103 Guinness Court, Snowsfields, London
- 103 Guinness Court, Snowsfields, London
- 49 Guinness Court, Snowsfields, London
- 49 Guinness Court, Snowsfields, London
- 35 Guinness Court, Snowsfields, London
- 35 Guinness Court, Snowsfields, London
- 14 Guinness Court, Snowsfields, London
- 14 Guinness Court, Snowsfields, London
- 23 Bridgewalk Heights, 80 Weston Street, London
- 23 Bridgewalk Heights, 80 Weston Street, London
- 12A Bridgewalk Heights, 80 Weston Street, London
- 12A Bridgewalk Heights, 80 Weston Street, London
- 12 Bridgewalk Heights, 80 Weston Street, London
- 12 Bridgewalk Heights, 80 Weston Street, London
- 10 Bridgewalk Heights, 80 Weston Street, London
- 10 Bridgewalk Heights, 80 Weston Street, London
- Flat 2, 11 Porlock Street, London
- Flat 2, 11 Porlock Street, London
- Flat 1, 2 Tyers Gate, London
- Flat 1, 2 Tyers Gate, London
- Flat 3, 92A Snowsfields, London
- Flat 3, 92A Snowsfields, London
- Flat 17, 70 Weston Street, London
- Flat 17, 70 Weston Street, London
- 39 Snowsfields, London, Southwark
- 39 Snowsfields, London, Southwark
- 10-11 Snowsfields, London, Southwark
- 10-11 Snowsfields, London, Southwark
- 75 Lockyer Estate, Kipling Street, London
- 75 Lockyer Estate, Kipling Street, London

- Flat 7, 70 Weston Street, London
- Flat 7, 70 Weston Street, London
- 37 Hamilton Square, Kipling Street, London
- 37 Hamilton Square, Kipling Street, London
- 27 Hamilton Square, Kipling Street, London
- 27 Hamilton Square, Kipling Street, London
- 15 Hamilton Square, Kipling Street, London
- 15 Hamilton Square, Kipling Street, London
- Flat 6, Sarah Swift House, Kipling Street
- Flat 6, Sarah Swift House, Kipling Street
- Flat 17, Sarah Swift House, Kipling Street
- Flat 17, Sarah Swift House, Kipling Street
- 1 Black Swan Yard, London, Southwark
- 1 Black Swan Yard, London, Southwark
- 68 Tyers Estate, Bermondsey Street, London
- 68 Tyers Estate, Bermondsey Street, London
- 57 Tyers Estate, Bermondsey Street, London
- 57 Tyers Estate, Bermondsey Street, London
- 54 Tyers Estate, Bermondsey Street, London
- 54 Tyers Estate, Bermondsey Street, London
- 35 Tyers Estate, Bermondsey Street, London
- 35 Tyers Estate, Bermondsey Street, London
- 21 Tyers Estate, Bermondsey Street, London
- 21 Tyers Estate, Bermondsey Street, London
- 18 Tyers Estate, Bermondsey Street, London
- 18 Tyers Estate, Bermondsey Street, London
- The Britannia, 44 Kipling Street, London
- The Britannia, 44 Kipling Street, London
- 72 Crosby Row, London, Southwark
- 72 Crosby Row, London, Southwark
- 46 Crosby Row, London, Southwark
- 46 Crosby Row, London, Southwark
- 24 Crosby Row, London, Southwark
- 24 Crosby Row, London, Southwark
- London Bridge Station, 61 St Thomas Street, London
- London Bridge Station, 61 St Thomas Street, London
- London Bridge Station, 2 Bermondsey Street, London
- London Bridge Station, 2 Bermondsey Street, London
- London Bridge Station, 2 Joiner Street, London
- London Bridge Station, 2 Joiner Street, London
- Unit 264, London Bridge Station, London Bridge Street
- Unit 264, London Bridge Station, London Bridge Street
- Unit 139 Service Yard, London Bridge Station, London Bridge Street
- Unit 139 Service Yard, London Bridge Station, London Bridge Street

- Unit 122, London Bridge Station, London Bridge Street
- Unit 122, London Bridge Station, London Bridge Street
- Unit 112, London Bridge Station, London Bridge Street
- Unit 112, London Bridge Station, London Bridge Street
- Apartment 2, 88A Tooley Street, London
- Apartment 2, 88A Tooley Street, London
- Flat 25, Marklake Court, 95 Weston Street
- Flat 25, Marklake Court, 95 Weston Street
- Flat 13, Marklake Court, 95 Weston Street
- Flat 13, Marklake Court, 95 Weston Street
- Room 4, Lowri Building, 112-114 Tooley Street
- Room 4, Lowri Building, 112-114 Tooley Street
- Room 2, Lowri Building, 112-114 Tooley Street
- Room 2, Lowri Building, 112-114 Tooley Street
- 10 Holyrood Street, London, Southwark
- 10 Holyrood Street, London, Southwark
- Apartment 7, 118 Tooley Street, London
- Apartment 7, 118 Tooley Street, London
- Picks Organic Farm, Guys Hospital, St Thomas Street
- Picks Organic Farm, Guys Hospital, St Thomas Street
- Flat 3, 83 Weston Street, London
- Flat 3, 83 Weston Street, London
- Flat 3, 123 Snowsfields, London
- Flat 3, 123 Snowsfields, London
- Arch 4, Crucifix Lane, London
- Arch 4, Crucifix Lane, London
- Unit 11, Shard Arcade, Joiner Street
- Unit 11, Shard Arcade, Joiner Street
- Ground Floor, 136-148 Tooley Street, London
- Ground Floor, 136-148 Tooley Street, London
- Basement And Ground Floor, 96 Tooley Street, London
- Basement And Ground Floor, 96 Tooley Street, London
- Level 27A, The Shard, 32 London Bridge Street
- Level 27A, The Shard, 32 London Bridge Street
- Kamen House, 23 Magdalen Street, London
- Kamen House, 23 Magdalen Street, London
- Flat 9, More Copper House, 14-16 Magdalen Street
- Flat 9, More Copper House, 14-16 Magdalen Street
- Unit 23, 52 Bermondsey Street, London
- Unit 23, 52 Bermondsey Street, London
- Unit 11, 52 Bermondsey Street, London
- Unit 11, 52 Bermondsey Street, London
- First Floor Flat, 72 Bermondsey Street, London
- First Floor Flat, 72 Bermondsey Street, London
- Fifth Floor Part, 39-45 Bermondsey Street, London
- Fifth Floor Part, 39-45 Bermondsey Street, London

- Flat 18, Kamen House, 17-21 Magdalen Street
- Flat 18, Kamen House, 17-21 Magdalen Street
- Flat 13, Kamen House, 17-21 Magdalen Street
- Flat 13, Kamen House, 17-21 Magdalen Street
- Flat 10, Kamen House, 17-21 Magdalen Street
- Flat 10, Kamen House, 17-21 Magdalen Street
- First Floor, 59-63 Bermondsey Street, London
- First Floor, 59-63 Bermondsey Street, London
- Flat 28, Kamen House, 17-21 Magdalen Street
- Flat 28, Kamen House, 17-21 Magdalen Street
- Second Floor, 16 Crucifix Lane, London
- Second Floor, 16 Crucifix Lane, London
- Flat 5, 16 Melior Street, London
- Flat 5, 16 Melior Street, London
- 81 Weston Street, London, Southwark
- 81 Weston Street, London, Southwark
- 5 Raquel Court, 147 Snowsfields, London
- 5 Raquel Court, 147 Snowsfields, London
- 8 Raquel Court, 147 Snowsfields, London
- 8 Raquel Court, 147 Snowsfields, London
- 6 Raquel Court, 147 Snowsfields, London
- 6 Raquel Court, 147 Snowsfields, London
- Basement To First Floor, 92-94 Tooley Street, London
- Basement To First Floor, 92-94 Tooley Street, London
- First Floor, 9 Holyrood Street, London
- First Floor, 9 Holyrood Street, London
- Ground Floor, 7 Holyrood Street, London
- Ground Floor, 7 Holyrood Street, London
- Apartment 20, 36 Snowsfields, London
- Apartment 20, 36 Snowsfields, London
- The Medical Protection Society Ltd, The Shard, 32 London Bridge Street
- The Medical Protection Society Ltd, The Shard, 32 London Bridge Street
- 12 Guy Street, London, Southwark
- 12 Guy Street, London, Southwark
- Basement To Third Floor, 37-37A Snowsfields, London
- Basement To Third Floor, 37-37A Snowsfields, London
- 21 Hamilton Square, Kipling Street, London
- 21 Hamilton Square, Kipling Street, London
- Flat 1, More Copper House, 14-16 Magdalen Street
- Flat 1, More Copper House, 14-16 Magdalen Street
- The Wine And Spirit Trade Association Ltd, 39-45 Bermondsey Street, London
- The Wine And Spirit Trade Association Ltd, 39-45 Bermondsey Street, London

- Unit 11, 54 Bermondsey Street, London
- Unit 11, 54 Bermondsey Street, London
- Apartment 4, 118 Tooley Street, London
- Apartment 4, 118 Tooley Street, London
- 26 Crosby Row, London, Southwark
- 26 Crosby Row, London, Southwark
- Flat 1, 104 Tooley Street, London
- Flat 1, 104 Tooley Street, London
- Ground Floor, Raquel Court, 147 Snowsfields
- Ground Floor, Raquel Court, 147 Snowsfields
- 34 Oxford Drive, London, Southwark
- 34 Oxford Drive, London, Southwark
- 4 Carmarthen Place, London, Southwark
- 4 Carmarthen Place, London, Southwark
- Flat 16, Marklake Court, 95 Weston Street
- Flat 16, Marklake Court, 95 Weston Street
- London Bridge Station, 8 Bermondsey Street, London
- London Bridge Station, 8 Bermondsey Street, London
- 47 Bermondsey Street, London, Southwark
- 47 Bermondsey Street, London, Southwark
- 13 Snowsfields, London, Southwark
- 13 Snowsfields, London, Southwark
- Second Floor, 3-5 Hardwidge Street, London
- Second Floor, 3-5 Hardwidge Street, London
- Second Floor, Natraj The Tannery, Bermondsey Street
- Second Floor, Natraj The Tannery, Bermondsey Street
- Unit 3, Shard Arcade, Joiner Street
- Unit 3, Shard Arcade, Joiner Street
- Flat 9, 48 Kipling Street, London
- Flat 9, 48 Kipling Street, London
- 5 Bridgewalk Heights, 80 Weston Street, London
- 5 Bridgewalk Heights, 80 Weston Street, London
- 35 Hamilton Square, Kipling Street, London
- 35 Hamilton Square, Kipling Street, London
- First Floor, 40 Bermondsey Street, London
- First Floor, 40 Bermondsey Street, London
- Ground Floor Left, 3-5 Hardwidge Street, London
- Ground Floor Left, 3-5 Hardwidge Street, London
- 11 Raquel Court, 147 Snowsfields, London
- 11 Raquel Court, 147 Snowsfields, London
- Second To Fifth Floors, Capital House, 42 Weston Street
- Second To Fifth Floors, Capital House, 42 Weston Street
- Part Ground Floor And Eighth Floor, Capital House, 42
Weston Street
- Part Ground Floor And Eighth Floor, Capital House, 42
Weston Street

- Flat 4, 38 Snowsfields, London
- Flat 4, 38 Snowsfields, London
- Flat 24, Marklake Court, 95 Weston Street
- Flat 24, Marklake Court, 95 Weston Street
- Flat 11, Marklake Court, 95 Weston Street
- Flat 11, Marklake Court, 95 Weston Street
- London Bridge Station, 4 Bermondsey Street, London
- London Bridge Station, 4 Bermondsey Street, London
- London Bridge Station, 52 Tooley Street, London
- London Bridge Station, 52 Tooley Street, London
- Unit 265, London Bridge Station, London Bridge Street
- Unit 265, London Bridge Station, London Bridge Street
- Unit 263, London Bridge Station, London Bridge Street
- Unit 263, London Bridge Station, London Bridge Street
- Unit 136, London Bridge Station, London Bridge Street
- Unit 136, London Bridge Station, London Bridge Street
- Unit 118, London Bridge Station, London Bridge Street
- Unit 118, London Bridge Station, London Bridge Street
- Unit 104, London Bridge Station, London Bridge Street
- Unit 104, London Bridge Station, London Bridge Street
- Flat 2, 123 Snowsfields, London
- Flat 2, 123 Snowsfields, London
- Third Floor, 90A Tooley Street, London
- Third Floor, 90A Tooley Street, London
- Room 10, Lowri Building, 112-114 Tooley Street
- Room 10, Lowri Building, 112-114 Tooley Street
- Room 3, Lowri Building, 112-114 Tooley Street
- Room 3, Lowri Building, 112-114 Tooley Street
- 42-44 Bermondsey Street, London, Southwark
- 42-44 Bermondsey Street, London, Southwark
- 18 Oxford Drive, London, Southwark
- 18 Oxford Drive, London, Southwark
- 4 Tyers Estate, Bermondsey Street, London
- 4 Tyers Estate, Bermondsey Street, London
- 64 Tyers Estate, Bermondsey Street, London
- 64 Tyers Estate, Bermondsey Street, London
- Flat 10, Lion Court, 28 Magdalen Street
- Flat 10, Lion Court, 28 Magdalen Street
- 80 Guinness Court, Snowsfields, London
- 80 Guinness Court, Snowsfields, London
- 71 Guinness Court, Snowsfields, London
- 71 Guinness Court, Snowsfields, London
- 29 Tyers Estate, Bermondsey Street, London
- 29 Tyers Estate, Bermondsey Street, London
- 102 Guinness Court, Snowsfields, London
- 102 Guinness Court, Snowsfields, London

- 5 Guinness Court, Snowsfields, London
- 5 Guinness Court, Snowsfields, London
- 112-114 Tooley Street, London, Southwark
- 112-114 Tooley Street, London, Southwark
- 18 Guinness Court, Snowsfields, London
- 18 Guinness Court, Snowsfields, London
- 12 Guinness Court, Snowsfields, London
- 12 Guinness Court, Snowsfields, London
- 8 Porlock Street, London, Southwark
- 8 Porlock Street, London, Southwark
- 10 Porlock Street, London, Southwark
- 10 Porlock Street, London, Southwark
- 79 Weston Street, London, Southwark
- 79 Weston Street, London, Southwark
- 88 Crosby Row, London, Southwark
- 88 Crosby Row, London, Southwark
- Flat 3, Sarah Swift House, Kipling Street
- Flat 3, Sarah Swift House, Kipling Street
- Flat 22, Lion Court, 12 Shand Street
- Flat 22, Lion Court, 12 Shand Street
- Unit 2, 36 Snowsfields, London
- Unit 2, 36 Snowsfields, London
- Unit 14, Shard Arcade, Joiner Street
- Unit 14, Shard Arcade, Joiner Street
- Flat 9, St Lukes Court, 124-126 Tooley Street
- Flat 9, St Lukes Court, 124-126 Tooley Street
- 43 Oxford Drive, London, Southwark
- 43 Oxford Drive, London, Southwark
- 40 Oxford Drive, London, Southwark
- 40 Oxford Drive, London, Southwark
- Ground Floor, 1-7 Fenning Street, London
- Ground Floor, 1-7 Fenning Street, London
- Unit 13, 52 Bermondsey Street, London
- Unit 13, 52 Bermondsey Street, London
- Flat 3, Globe House, 2A Crucifix Lane
- Flat 3, Globe House, 2A Crucifix Lane
- Flat 1, Kamen House, 17-21 Magdalen Street
- Flat 1, Kamen House, 17-21 Magdalen Street
- Fourth Floor Part, 39-45 Bermondsey Street, London
- Fourth Floor Part, 39-45 Bermondsey Street, London
- 4 Raquel Court, 147 Snowsfields, London
- 4 Raquel Court, 147 Snowsfields, London
- 1 Raquel Court, 147 Snowsfields, London
- 1 Raquel Court, 147 Snowsfields, London
- Basement, 136-148 Tooley Street, London
- Basement, 136-148 Tooley Street, London

- Basement And Ground Floor, 88A Tooley Street, London
- Basement And Ground Floor, 88A Tooley Street, London
- First Floor Flat, The Glasshouse, 3 Melior Place
- First Floor Flat, The Glasshouse, 3 Melior Place
- 24 Oxford Drive, London, Southwark
- 24 Oxford Drive, London, Southwark
- 23 Oxford Drive, London, Southwark
- 23 Oxford Drive, London, Southwark
- 3 Oxford Drive, London, Southwark
- 3 Oxford Drive, London, Southwark
- Flat 32, Lion Court, 12 Shand Street
- Flat 32, Lion Court, 12 Shand Street
- 99 Guinness Court, Snowsfields, London
- 99 Guinness Court, Snowsfields, London
- 76 Guinness Court, Snowsfields, London
- 76 Guinness Court, Snowsfields, London
- Flat 8, St Lukes Court, 124-126 Tooley Street
- Flat 8, St Lukes Court, 124-126 Tooley Street
- Flat 7, St Lukes Court, 124-126 Tooley Street
- Flat 7, St Lukes Court, 124-126 Tooley Street
- 117 Guinness Court, Snowsfields, London
- 117 Guinness Court, Snowsfields, London
- 108 Guinness Court, Snowsfields, London
- 108 Guinness Court, Snowsfields, London
- 106 Guinness Court, Snowsfields, London
- 106 Guinness Court, Snowsfields, London
- 57 Guinness Court, Snowsfields, London
- 57 Guinness Court, Snowsfields, London
- 54 Guinness Court, Snowsfields, London
- 54 Guinness Court, Snowsfields, London
- 44 Guinness Court, Snowsfields, London
- 44 Guinness Court, Snowsfields, London
- 2 Guinness Court, Snowsfields, London
- 2 Guinness Court, Snowsfields, London
- 13 Guinness Court, Snowsfields, London
- 13 Guinness Court, Snowsfields, London
- 31 Bridgewalk Heights, 80 Weston Street, London
- 31 Bridgewalk Heights, 80 Weston Street, London
- Flat 1, 42 Snowsfields, London
- Flat 1, 42 Snowsfields, London
- Flat 20, 70 Weston Street, London
- Flat 20, 70 Weston Street, London
- 17 Snowsfields, London, Southwark
- 17 Snowsfields, London, Southwark
- 12 Snowsfields, London, Southwark
- 12 Snowsfields, London, Southwark

- 93 Snowsfields, London, Southwark
- 93 Snowsfields, London, Southwark
- Flat 16, 70 Weston Street, London
- Flat 16, 70 Weston Street, London
- 39 Oxford Drive, London, Southwark
- 39 Oxford Drive, London, Southwark
- 33 Oxford Drive, London, Southwark
- 33 Oxford Drive, London, Southwark
- Fourth Floor, Shand House, 14-20 Shand Street
- Fourth Floor, Shand House, 14-20 Shand Street
- Flat 33, Lion Court, 12 Shand Street
- Flat 33, Lion Court, 12 Shand Street
- Flat 30, Lion Court, 12 Shand Street
- Flat 30, Lion Court, 12 Shand Street
- Flat 12, Lion Court, 12 Shand Street
- Flat 12, Lion Court, 12 Shand Street
- 92 Guinness Court, Snowsfields, London
- 92 Guinness Court, Snowsfields, London
- 89 Guinness Court, Snowsfields, London
- 89 Guinness Court, Snowsfields, London
- Flat 5, 70 Weston Street, London
- Flat 5, 70 Weston Street, London
- 11 Hamilton Square, Kipling Street, London
- 11 Hamilton Square, Kipling Street, London
- Flat 20, Sarah Swift House, Kipling Street
- Flat 20, Sarah Swift House, Kipling Street
- 61 St Thomas Street, London, Southwark
- 61 St Thomas Street, London, Southwark
- Flat 9, 64 Weston Street, London
- Flat 9, 64 Weston Street, London
- Flat 4, 62 Weston Street, London
- Flat 4, 62 Weston Street, London
- Flat 2, 64 Weston Street, London
- Flat 2, 64 Weston Street, London
- 8 Tyers Estate, Bermondsey Street, London
- 8 Tyers Estate, Bermondsey Street, London
- 66 Tyers Estate, Bermondsey Street, London
- 66 Tyers Estate, Bermondsey Street, London
- 38 Tyers Estate, Bermondsey Street, London
- 38 Tyers Estate, Bermondsey Street, London
- 22 Tyers Estate, Bermondsey Street, London
- 22 Tyers Estate, Bermondsey Street, London
- 80 Bermondsey Street, London, Southwark
- 80 Bermondsey Street, London, Southwark
- Flat 4, 4B Tyers Gate, London
- Flat 4, 4B Tyers Gate, London

- 8 Guy Street, London, Southwark
- 8 Guy Street, London, Southwark
- 14 Guy Street, London, Southwark
- 14 Guy Street, London, Southwark
- 78 Crosby Row, London, Southwark
- 78 Crosby Row, London, Southwark
- 54 Crosby Row, London, Southwark
- 54 Crosby Row, London, Southwark
- 12 Crosby Row, London, Southwark
- 12 Crosby Row, London, Southwark
- London Bridge Station, 57 St Thomas Street, London
- London Bridge Station, 57 St Thomas Street, London
- London Bridge Station, 54 Tooley Street, London
- London Bridge Station, 54 Tooley Street, London
- Unit 181, London Bridge Station, London Bridge Street
- Unit 181, London Bridge Station, London Bridge Street
- Unit 269, London Bridge Station, London Bridge Street
- Unit 269, London Bridge Station, London Bridge Street
- Unit 110, London Bridge Station, London Bridge Street
- Unit 110, London Bridge Station, London Bridge Street
- Flat 20, Marklake Court, 95 Weston Street
- Flat 20, Marklake Court, 95 Weston Street
- Level 72, The Shard, 32 London Bridge Street
- Level 72, The Shard, 32 London Bridge Street
- Flat 1, 85 Weston Street, London
- Flat 1, 85 Weston Street, London
- Flat 1, 83 Weston Street, London
- Flat 1, 83 Weston Street, London
- Unit 309, Shard Arcade, Joiner Street
- Unit 309, Shard Arcade, Joiner Street
- Unit 301, Shard Arcade, Joiner Street
- Unit 301, Shard Arcade, Joiner Street
- Unit 8, Shard Arcade, Joiner Street
- Unit 8, Shard Arcade, Joiner Street
- Unit 4, Shard Arcade, Joiner Street
- Unit 4, Shard Arcade, Joiner Street
- Unit 13, Shard Arcade, Joiner Street
- Unit 13, Shard Arcade, Joiner Street
- Unit 3, 36 Snowsfields, London
- Unit 3, 36 Snowsfields, London
- Flat 9A, 79 Bermondsey Street, London
- Flat 9A, 79 Bermondsey Street, London
- Level 26, The Shard, 32 London Bridge Street
- Level 26, The Shard, 32 London Bridge Street
- Level 19, The Shard, 32 London Bridge Street
- Level 19, The Shard, 32 London Bridge Street

- Level 3, The Shard, 32 London Bridge Street
- Level 3, The Shard, 32 London Bridge Street
- Apartment 9, The Shard, 31 St Thomas Street
- Apartment 9, The Shard, 31 St Thomas Street
- Apartment 8, The Shard, 31 St Thomas Street
- Apartment 8, The Shard, 31 St Thomas Street
- Apartment 1, The Shard, 31 St Thomas Street
- Apartment 1, The Shard, 31 St Thomas Street
- First Floor Second Floor Third Floor Flat, 106 Tooley Street, London
- First Floor Second Floor Third Floor Flat, 106 Tooley Street, London
- Kamen House, 22 Magdalen Street, London
- Kamen House, 22 Magdalen Street, London
- Unit 1, 8 Tyers Gate, London
- Unit 1, 8 Tyers Gate, London
- Flat 4A, 16 Crucifix Lane, London
- Flat 4A, 16 Crucifix Lane, London
- Flat 1, 54 Weston Street, London
- Flat 1, 54 Weston Street, London
- Flat 1, 100 Tooley Street, London
- Flat 1, 100 Tooley Street, London
- Counting House, Guys Hospital, Great Maze Pond
- Counting House, Guys Hospital, Great Maze Pond
- Friends Of Guys Hospital Shop, Guys Hospital Courtyard, St Thomas Street
- Friends Of Guys Hospital Shop, Guys Hospital Courtyard, St Thomas Street
- Laxmi, The Tanneries, 55 Bermondsey Street
- Laxmi, The Tanneries, 55 Bermondsey Street
- 85 Guinness Court, Snowsfields, London
- 85 Guinness Court, Snowsfields, London
- 78 Guinness Court, Snowsfields, London
- 78 Guinness Court, Snowsfields, London
- 70 Guinness Court, Snowsfields, London
- 70 Guinness Court, Snowsfields, London
- Flat 10, St Lukes Court, 124-126 Tooley Street
- Flat 10, St Lukes Court, 124-126 Tooley Street
- 56 Guinness Court, Snowsfields, London
- 56 Guinness Court, Snowsfields, London
- 43 Guinness Court, Snowsfields, London
- 43 Guinness Court, Snowsfields, London
- 39 Guinness Court, Snowsfields, London
- 39 Guinness Court, Snowsfields, London
- 21 Guinness Court, Snowsfields, London
- 21 Guinness Court, Snowsfields, London

- 17 Guinness Court, Snowsfields, London
- 17 Guinness Court, Snowsfields, London
- 11 Guinness Court, Snowsfields, London
- 11 Guinness Court, Snowsfields, London
- Flat 3, 42 Snowsfields, London
- Flat 3, 42 Snowsfields, London
- 72 Lockyer Estate, Kipling Street, London
- 72 Lockyer Estate, Kipling Street, London
- 66 Lockyer Estate, Kipling Street, London
- 66 Lockyer Estate, Kipling Street, London
- 64 Lockyer Estate, Kipling Street, London
- 64 Lockyer Estate, Kipling Street, London
- Flat 8, 70 Weston Street, London
- Flat 8, 70 Weston Street, London
- 5 Hamilton Square, Kipling Street, London
- 5 Hamilton Square, Kipling Street, London
- 4 Hamilton Square, Kipling Street, London
- 4 Hamilton Square, Kipling Street, London
- 32 Hamilton Square, Kipling Street, London
- 32 Hamilton Square, Kipling Street, London
- 28 Hamilton Square, Kipling Street, London
- 28 Hamilton Square, Kipling Street, London
- 17 Hamilton Square, Kipling Street, London
- 17 Hamilton Square, Kipling Street, London
- Flat 7, 79 Bermondsey Street, London
- Flat 7, 79 Bermondsey Street, London
- Flat 1, 64 Weston Street, London
- Flat 1, 64 Weston Street, London
- 11 Tyers Estate, Bermondsey Street, London
- 11 Tyers Estate, Bermondsey Street, London
- Flat 7, 72 Weston Street, London
- Flat 7, 72 Weston Street, London
- Fourth Floor, 18-20 Crucifix Lane, London
- Fourth Floor, 18-20 Crucifix Lane, London
- 52 Tyers Estate, Bermondsey Street, London
- 52 Tyers Estate, Bermondsey Street, London
- Snowsfields Primary School, Kirby Grove, London
- Snowsfields Primary School, Kirby Grove, London
- 68 Bermondsey Street, London, Southwark
- 68 Bermondsey Street, London, Southwark
- 6 Guy Street, London, Southwark
- 6 Guy Street, London, Southwark
- 18 Guy Street, London, Southwark
- 18 Guy Street, London, Southwark
- 34 Crosby Row, London, Southwark
- 34 Crosby Row, London, Southwark

- 32 Crosby Row, London, Southwark
- 32 Crosby Row, London, Southwark
- 76A Bermondsey Street, London, Southwark
- 76A Bermondsey Street, London, Southwark
- 56-58 Weston Street, London, Southwark
- 56-58 Weston Street, London, Southwark
- London Bridge Station, 10 Bermondsey Street, London
- London Bridge Station, 10 Bermondsey Street, London
- London Bridge Station, 60 Tooley Street, London
- London Bridge Station, 60 Tooley Street, London
- 60A Weston Street, London, Southwark
- 60A Weston Street, London, Southwark
- Unit 261, London Bridge Station, London Bridge Street
- Unit 261, London Bridge Station, London Bridge Street
- Unit 142, London Bridge Station, London Bridge Street
- Unit 142, London Bridge Station, London Bridge Street
- Unit 140, London Bridge Station, London Bridge Street
- Unit 140, London Bridge Station, London Bridge Street
- Unit 117, London Bridge Station, London Bridge Street
- Unit 117, London Bridge Station, London Bridge Street
- Flat 7, Marklake Court, 95 Weston Street
- Flat 7, Marklake Court, 95 Weston Street
- Flat 5, Marklake Court, 95 Weston Street
- Flat 5, Marklake Court, 95 Weston Street
- Room 7, Lowri Building, 112-114 Tooley Street
- Room 7, Lowri Building, 112-114 Tooley Street
- Room 6, Lowri Building, 112-114 Tooley Street
- Room 6, Lowri Building, 112-114 Tooley Street
- Apartment 3, 118 Tooley Street, London
- Apartment 3, 118 Tooley Street, London
- Unit 1, Shard Arcade, Joiner Street
- Unit 1, Shard Arcade, Joiner Street
- Apartment 10, 8 Melior Street, London
- Apartment 10, 8 Melior Street, London
- Apartment 27, 36 Snowsfields, London
- Apartment 27, 36 Snowsfields, London
- Apartment 19, 36 Snowsfields, London
- Apartment 19, 36 Snowsfields, London
- Ground Floor To Second Floor, 22 Shand Street, London
- Ground Floor To Second Floor, 22 Shand Street, London
- 73B Maltings Place, London, Southwark
- 73B Maltings Place, London, Southwark
- Flat 6, 16 Melior Street, London
- Flat 6, 16 Melior Street, London
- Vinegar Yard, 70 - 82 St Thomas Street, London
- Vinegar Yard, 70 - 82 St Thomas Street, London

- Ground Floor, 48-50 Weston Street, London
- Ground Floor, 48-50 Weston Street, London
- Third Floor, 7 Holyrood Street, London
- Third Floor, 7 Holyrood Street, London
- Ground Floor Right, 3-5 Hardwidge Street, London
- Ground Floor Right, 3-5 Hardwidge Street, London
- 3A Bridgewalk Heights, 80 Weston Street, London
- 3A Bridgewalk Heights, 80 Weston Street, London
- Third Floor, 22 Shand Street, London
- Third Floor, 22 Shand Street, London
- Flat 4, 8 Tyers Gate, London
- Flat 4, 8 Tyers Gate, London
- Second Floor, 7 Holyrood Street, London
- Second Floor, 7 Holyrood Street, London
- Basement To First Floor, 150-152 Tooley Street, London
- Basement To First Floor, 150-152 Tooley Street, London
- Level 23, The Shard, 32 London Bridge Street
- Level 23, The Shard, 32 London Bridge Street
- Apartment 8, 8 Melior Street, London
- Apartment 8, 8 Melior Street, London
- 98A Tooley Street, London, Southwark
- 98A Tooley Street, London, Southwark
- 21 Oxford Drive, London, Southwark
- 21 Oxford Drive, London, Southwark
- Unit 12, Shard Arcade, Joiner Street
- Unit 12, Shard Arcade, Joiner Street
- West Wing Nurses Home, Guys Hospital, Great Maze

Pond

- West Wing Nurses Home, Guys Hospital, Great Maze

Pond

- Flat 1, 92A Snowsfields, London
- Flat 1, 92A Snowsfields, London
- 30 Hamilton Square, Kipling Street, London
- 30 Hamilton Square, Kipling Street, London
- Flat 11, Sarah Swift House, Kipling Street
- Flat 11, Sarah Swift House, Kipling Street
- 6 Tyers Estate, Bermondsey Street, London
- 6 Tyers Estate, Bermondsey Street, London
- 55 Tyers Estate, Bermondsey Street, London
- 55 Tyers Estate, Bermondsey Street, London
- 92 Crosby Row, London, Southwark
- 92 Crosby Row, London, Southwark
- Flat 1, Marklake Court, 95 Weston Street
- Flat 1, Marklake Court, 95 Weston Street
- Flat 3, Kamen House, 17-21 Magdalen Street
- Flat 3, Kamen House, 17-21 Magdalen Street

- Second Floor, 150-152 Tooley Street, London
- Second Floor, 150-152 Tooley Street, London
- Second Floor, 9 Holyrood Street, London
- Second Floor, 9 Holyrood Street, London
- Room 8, Lowri Building, 112-114 Tooley Street
- Room 8, Lowri Building, 112-114 Tooley Street
- 65 Lockyer Estate, Kipling Street, London
- 65 Lockyer Estate, Kipling Street, London
- 45 Tyers Estate, Bermondsey Street, London
- 45 Tyers Estate, Bermondsey Street, London
- 19 Bridgewalk Heights, 80 Weston Street, London
- 19 Bridgewalk Heights, 80 Weston Street, London
- Level 7, The Shard, 32 London Bridge Street
- Level 7, The Shard, 32 London Bridge Street
- 23 Guinness Court, Snowsfields, London
- 23 Guinness Court, Snowsfields, London
- 108-110 Tooley Street, London, Southwark
- 108-110 Tooley Street, London, Southwark
- 102 Tooley Street, London, Southwark
- 102 Tooley Street, London, Southwark
- 98 Guinness Court, Snowsfields, London
- 98 Guinness Court, Snowsfields, London
- 15 Snowsfields, London, Southwark
- 15 Snowsfields, London, Southwark
- 19 Guinness Court, Snowsfields, London
- 19 Guinness Court, Snowsfields, London
- 3 Tyers Estate, Bermondsey Street, London
- 3 Tyers Estate, Bermondsey Street, London
- 30 Snowsfields, London, Southwark
- 30 Snowsfields, London, Southwark
- 43 Tyers Estate, Bermondsey Street, London
- 43 Tyers Estate, Bermondsey Street, London
- 6 Bridgewalk Heights, 80 Weston Street, London
- 6 Bridgewalk Heights, 80 Weston Street, London
- Sixth Floor, 18-20 Crucifix Lane, London
- Sixth Floor, 18-20 Crucifix Lane, London
- Part Ground Floor Front, 134 Tooley Street, London
- Part Ground Floor Front, 134 Tooley Street, London
- Flat 1, Globe House, 2A Crucifix Lane
- Flat 1, Globe House, 2A Crucifix Lane
- Level 17B, The Shard, 32 London Bridge Street
- Level 17B, The Shard, 32 London Bridge Street
- Flat 14, Marklake Court, 95 Weston Street
- Flat 14, Marklake Court, 95 Weston Street
- Unit 268, London Bridge Station, London Bridge Street
- Unit 268, London Bridge Station, London Bridge Street

- Part Ground And First Floor, 73 Weston Street, London
- Part Ground And First Floor, 73 Weston Street, London
- Flat, 2 Crucifix Lane, London
- Flat, 2 Crucifix Lane, London
- Level 21, The Shard, 32 London Bridge Street
- Level 21, The Shard, 32 London Bridge Street
- Level 6, The Shard, 32 London Bridge Street
- Level 6, The Shard, 32 London Bridge Street
- Flat 3A, 16 Crucifix Lane, London
- Flat 3A, 16 Crucifix Lane, London
- Flat 7, More Copper House, 14-16 Magdalen Street
- Flat 7, More Copper House, 14-16 Magdalen Street
- 29 Weston Street, London, Southwark
- 29 Weston Street, London, Southwark
- Room 205 West Wing Nurses Home, Guys Hospital, Great Maze Pond
- Room 205 West Wing Nurses Home, Guys Hospital, Great Maze Pond
- Unit 15, 52 Bermondsey Street, London
- Unit 15, 52 Bermondsey Street, London
- Second Floor, 40 Bermondsey Street, London
- Second Floor, 40 Bermondsey Street, London
- Flat 11, Kamen House, 17-21 Magdalen Street
- Flat 11, Kamen House, 17-21 Magdalen Street
- Flat 2, Kamen House, 17-21 Magdalen Street
- Flat 2, Kamen House, 17-21 Magdalen Street
- Second Floor, 59-63 Bermondsey Street, London
- Second Floor, 59-63 Bermondsey Street, London
- Flat 4, 16 Melior Street, London
- Flat 4, 16 Melior Street, London
- Flat 1, 16 Melior Street, London
- Flat 1, 16 Melior Street, London
- 15 Hardwidge Street, London, Southwark
- 15 Hardwidge Street, London, Southwark
- Part Ground Floor, 17 Hardwidge Street, London
- Part Ground Floor, 17 Hardwidge Street, London
- Ground Floor Rooms 2 And 3, 77 Weston Street, London
- Ground Floor Rooms 2 And 3, 77 Weston Street, London
- Basement And Ground Floor, 7-25 Bermondsey Street,
- Basement And Ground Floor, 7-25 Bermondsey Street,
- Flat 4, Sarah Swift House, Kipling Street
- Flat 4, Sarah Swift House, Kipling Street
- 126 Guinness Court, Snowsfields, London
- 126 Guinness Court, Snowsfields, London
- Level 14A, The Shard, 32 London Bridge Street
- Level 14A, The Shard, 32 London Bridge Street

- Level 30, The Shard, 32 London Bridge Street
- Level 30, The Shard, 32 London Bridge Street
- Basement And Ground Floor, 59 Bermondsey Street, London
- Basement And Ground Floor, 59 Bermondsey Street, London
- London Bridge Station, 50 Tooley Street, London
- London Bridge Station, 50 Tooley Street, London
- Unit 103, London Bridge Station, London Bridge Street
- Unit 103, London Bridge Station, London Bridge Street
- 125 Guinness Court, Snowsfields, London
- 125 Guinness Court, Snowsfields, London
- 87 Guinness Court, Snowsfields, London
- 87 Guinness Court, Snowsfields, London
- 59 Guinness Court, Snowsfields, London
- 59 Guinness Court, Snowsfields, London
- Flat 25, Kamen House, 17-21 Magdalen Street
- Flat 25, Kamen House, 17-21 Magdalen Street
- Level 2, The Shard, 32 London Bridge Street
- Level 2, The Shard, 32 London Bridge Street
- Unit 304, Shard Arcade, Joiner Street
- Unit 304, Shard Arcade, Joiner Street
- Flat 5, 1 Shand Street, London
- Flat 5, 1 Shand Street, London
- Unit 313, Shard Arcade, Joiner Street
- Unit 313, Shard Arcade, Joiner Street
- Unit 145, London Bridge Station, London Bridge Street
- Unit 145, London Bridge Station, London Bridge Street
- Snowsfield Yard, 6-16 Melior Street, London
- Snowsfield Yard, 6-16 Melior Street, London
- Flat 5, 83 Weston Street, London
- Flat 5, 83 Weston Street, London
- Flat 2, 72 Weston Street, London
- Flat 2, 72 Weston Street, London
- Flat 3, 64 Weston Street, London
- Flat 3, 64 Weston Street, London
- 7 Oxford Drive, London, Southwark
- 7 Oxford Drive, London, Southwark
- Flat Above, 10-11 Snowsfields, London
- Flat Above, 10-11 Snowsfields, London
- 12 Tyers Estate, Bermondsey Street, London
- 12 Tyers Estate, Bermondsey Street, London
- 68 Lockyer Estate, Kipling Street, London
- 68 Lockyer Estate, Kipling Street, London
- 36 Hamilton Square, Kipling Street, London
- 36 Hamilton Square, Kipling Street, London

- 68 Guinness Court, Snowsfields, London
- 68 Guinness Court, Snowsfields, London
- 37 Tyers Estate, Bermondsey Street, London
- 37 Tyers Estate, Bermondsey Street, London
- 17 Tyers Estate, Bermondsey Street, London
- 17 Tyers Estate, Bermondsey Street, London
- Second And Third Floor Flat, 96 Tooley Street, London
- Second And Third Floor Flat, 96 Tooley Street, London
- 12 Hamilton Square, Kipling Street, London
- 12 Hamilton Square, Kipling Street, London
- 4 Porlock Street, London, Southwark
- 4 Porlock Street, London, Southwark
- Unit 9, Shard Arcade, Joiner Street
- Unit 9, Shard Arcade, Joiner Street
- Guys Hospital, St Thomas Street, London
- Guys Hospital, St Thomas Street, London
- 22 Crosby Row, London, Southwark
- 22 Crosby Row, London, Southwark
- Flat 14, St Lukes Court, 124-126 Tooley Street
- Flat 14, St Lukes Court, 124-126 Tooley Street
- 47 Oxford Drive, London, Southwark
- 47 Oxford Drive, London, Southwark
- Level 12, The Shard, 32 London Bridge Street
- Level 12, The Shard, 32 London Bridge Street
- Office B First Floor, 7 Holyrood Street, London
- Office B First Floor, 7 Holyrood Street, London
- Restaurant Levels 31 And 33, The Shard, 31 St Thomas Street
- Restaurant Levels 31 And 33, The Shard, 31 St Thomas Street
- Restaurant Levels 31 And 33, The Shard, 31 St Thomas Street
- 82 St Thomas Street, London, Southwark
- 82 St Thomas Street, London, Southwark
- Apartment 10, The Shard, 31 St Thomas Street
- Apartment 10, The Shard, 31 St Thomas Street
- Arthurs Mission Hall, Snowsfields, London
- Arthurs Mission Hall, Snowsfields, London
- Second Floor And Third Floor Flat, 72 Bermondsey Street,
- Second Floor And Third Floor Flat, 72 Bermondsey Street,
- Atrium 2, Guys Hospital, St Thomas Street
- Atrium 2, Guys Hospital, St Thomas Street
- Flat 13, More Copper House, 14-16 Magdalen Street
- Flat 13, More Copper House, 14-16 Magdalen Street
- Ground Floor, 47 Bermondsey Street, London
- Ground Floor, 47 Bermondsey Street, London
- Flat 3, 100 Tooley Street, London
- Flat 3, 100 Tooley Street, London

- Flat 27, Kamen House, 17-21 Magdalen Street
- Flat 27, Kamen House, 17-21 Magdalen Street
- Flat 14, Kamen House, 17-21 Magdalen Street
- Flat 14, Kamen House, 17-21 Magdalen Street
- Flat 12, Kamen House, 17-21 Magdalen Street
- Flat 12, Kamen House, 17-21 Magdalen Street
- Second And Third Floor, 61 Bermondsey Street, London
- Second And Third Floor, 61 Bermondsey Street, London
- The Hide Bar, 39-45 Bermondsey Street, London
- The Hide Bar, 39-45 Bermondsey Street, London
- Montessori, 7-13 Melior Street, London
- Montessori, 7-13 Melior Street, London
- Flat, The Old Miller Of Mansfield, 96-101 Snowsfields
- Flat, The Old Miller Of Mansfield, 96-101 Snowsfields
- Ground Floor Flat, 52 Weston Street, London
- Ground Floor Flat, 52 Weston Street, London
- 7 Raquel Court, 147 Snowsfields, London
- 7 Raquel Court, 147 Snowsfields, London
- Part Fourth Floor And Fifth Floor, 136-148 Tooley Street,
- Part Fourth Floor And Fifth Floor, 136-148 Tooley Street,
- Second Floor, 60 Weston Street, London
- Second Floor, 60 Weston Street, London
- First Floor, 60 Weston Street, London
- First Floor, 60 Weston Street, London
- Fifth Floor, 18-20 Crucifix Lane, London
- Fifth Floor, 18-20 Crucifix Lane, London
- 48 Oxford Drive, London, Southwark
- 48 Oxford Drive, London, Southwark
- 30 Oxford Drive, London, Southwark
- 30 Oxford Drive, London, Southwark
- 19 Oxford Drive, London, Southwark
- 19 Oxford Drive, London, Southwark
- 2 Oxford Drive, London, Southwark
- 2 Oxford Drive, London, Southwark
- 14 Bermondsey Street, London, Southwark
- 14 Bermondsey Street, London, Southwark
- 136 Guinness Court, Snowsfields, London
- 136 Guinness Court, Snowsfields, London
- 81 Guinness Court, Snowsfields, London
- 81 Guinness Court, Snowsfields, London
- Apartment 6, 36 Snowsfields, London
- Apartment 6, 36 Snowsfields, London
- 41 Oxford Drive, London, Southwark
- 41 Oxford Drive, London, Southwark
- Flat 1, 38 Snowsfields, London
- Flat 1, 38 Snowsfields, London

- Third Floor Rear, 134 Tooley Street, London
- Third Floor Rear, 134 Tooley Street, London
- First Floor, 3-5 Hardwidge Street, London
- First Floor, 3-5 Hardwidge Street, London
 - Unit 305, Shard Arcade, Joiner Street
- Unit 305, Shard Arcade, Joiner Street
- London Bridge Station, 1 Joiner Street, London
- London Bridge Station, 1 Joiner Street, London
- Unit 125, London Bridge Station, London Bridge Street
- Unit 125, London Bridge Station, London Bridge Street
- Flat 6, Marklake Court, 95 Weston Street
- Flat 6, Marklake Court, 95 Weston Street
- Flat 9, 70 Weston Street, London
- Flat 9, 70 Weston Street, London
- 73A Weston Street, London, Southwark
- 73A Weston Street, London, Southwark
- Flat 11, 64 Weston Street, London
- Flat 11, 64 Weston Street, London
- 41 Snowsfields, London, Southwark
- 41 Snowsfields, London, Southwark
- 146 Guinness Court, Snowsfields, London
- 146 Guinness Court, Snowsfields, London
- 26 Hamilton Square, Kipling Street, London
- 26 Hamilton Square, Kipling Street, London
- 74 Guinness Court, Snowsfields, London
- 74 Guinness Court, Snowsfields, London
- 119 Guinness Court, Snowsfields, London
- 119 Guinness Court, Snowsfields, London
- 48 Tyers Estate, Bermondsey Street, London
- 48 Tyers Estate, Bermondsey Street, London
- 42 Tyers Estate, Bermondsey Street, London
- 42 Tyers Estate, Bermondsey Street, London
- 107 Guinness Court, Snowsfields, London
- 107 Guinness Court, Snowsfields, London
- Flat 12, Sarah Swift House, Kipling Street
- Flat 12, Sarah Swift House, Kipling Street
- Flat 25, Lion Court, 12 Shand Street
- Flat 25, Lion Court, 12 Shand Street
- 1 Bridgewalk Heights, 80 Weston Street, London
- 1 Bridgewalk Heights, 80 Weston Street, London
- Apartment 26, 36 Snowsfields, London
- Apartment 26, 36 Snowsfields, London
- Navigator House, 4A Tyers Gate, London
- Navigator House, 4A Tyers Gate, London
- Flat 2, 92A Snowsfields, London
- Flat 2, 92A Snowsfields, London

- 6 Melior Street, London, Southwark
- 6 Melior Street, London, Southwark
- Shangri La Hotel, The Shard, 31 St Thomas Street
- Shangri La Hotel, The Shard, 31 St Thomas Street
- Apartment 5, The Shard, 31 St Thomas Street
- Apartment 5, The Shard, 31 St Thomas Street
- Apartment 2, The Shard, 31 St Thomas Street
- Apartment 2, The Shard, 31 St Thomas Street
- Sixth Floor And Seventh Floor, Capital House, 42 Weston Street
- Sixth Floor And Seventh Floor, Capital House, 42 Weston Street
- Second Floor, Bramah House, 65-71 Bermondsey Street
- Second Floor, Bramah House, 65-71 Bermondsey Street
- Unit 25, 52 Bermondsey Street, London
- Unit 25, 52 Bermondsey Street, London
- Flat 17, Kamen House, 17-21 Magdalen Street
- Flat 17, Kamen House, 17-21 Magdalen Street
- Flat 4, Kamen House, 17-21 Magdalen Street
- Flat 4, Kamen House, 17-21 Magdalen Street
- Third Floor, Bramah House, 65-71 Bermondsey Street
- Third Floor, Bramah House, 65-71 Bermondsey Street
- 76 Bermondsey Street, London, Southwark
- 76 Bermondsey Street, London, Southwark
- Room 307, Guys Hospital, Great Maze Pond
- Room 307, Guys Hospital, Great Maze Pond
- The Greenwood Theatre, 55 Weston Street, London
- The Greenwood Theatre, 55 Weston Street, London
- First Floor And Second Floor Flat, 114 Tooley Street,
- First Floor And Second Floor Flat, 114 Tooley Street,
- Flat 2, 38 Snowsfields, London
- Flat 2, 38 Snowsfields, London
- Unit 5, Railway Arches 885 And 886, Holyrood Street
- Unit 5, Railway Arches 885 And 886, Holyrood Street
- Third Floor Flat, 75 Weston Street, London
- Third Floor Flat, 75 Weston Street, London
- 1-5 Bermondsey Street, London, Southwark
- 1-5 Bermondsey Street, London, Southwark
- 29 Shand Street, London, Southwark
- 29 Shand Street, London, Southwark
- 35 Oxford Drive, London, Southwark
- 35 Oxford Drive, London, Southwark
- 20 Oxford Drive, London, Southwark
- 20 Oxford Drive, London, Southwark
- Flat 19, Lion Court, 28 Magdalen Street
- Flat 19, Lion Court, 28 Magdalen Street

- Lion Court, 28 Magdalen Street, London
- Lion Court, 28 Magdalen Street, London
- Flat 11, Lion Court, 28 Magdalen Street
- Flat 11, Lion Court, 28 Magdalen Street
- Flat 35, Lion Court, 12 Shand Street
- Flat 35, Lion Court, 12 Shand Street
- Flat 16, Lion Court, 12 Shand Street
- Flat 16, Lion Court, 12 Shand Street
- 142 Guinness Court, Snowsfields, London
- 142 Guinness Court, Snowsfields, London
- 138 Guinness Court, Snowsfields, London
- 138 Guinness Court, Snowsfields, London
- 132 Guinness Court, Snowsfields, London
- 132 Guinness Court, Snowsfields, London
- 127 Guinness Court, Snowsfields, London
- 127 Guinness Court, Snowsfields, London
- 124 Guinness Court, Snowsfields, London
- 124 Guinness Court, Snowsfields, London
- 93 Guinness Court, Snowsfields, London
- 93 Guinness Court, Snowsfields, London
- 90 Guinness Court, Snowsfields, London
- 90 Guinness Court, Snowsfields, London
- 82 Guinness Court, Snowsfields, London
- 82 Guinness Court, Snowsfields, London
- 51-57 St Thomas Street, London, Southwark
- 51-57 St Thomas Street, London, Southwark
- 6 Guinness Court, Snowsfields, London
- 6 Guinness Court, Snowsfields, London
- 46 Guinness Court, Snowsfields, London
- 46 Guinness Court, Snowsfields, London
- 38 Guinness Court, Snowsfields, London
- 38 Guinness Court, Snowsfields, London
- 3 Guinness Court, Snowsfields, London
- 3 Guinness Court, Snowsfields, London
- 96 Tooley Street, London, Southwark
- 96 Tooley Street, London, Southwark
- 24 Guinness Court, Snowsfields, London
- 24 Guinness Court, Snowsfields, London
- 33A Bridgewalk Heights, 80 Weston Street, London
- 33A Bridgewalk Heights, 80 Weston Street, London
- Flat 5, 2 Tyers Gate, London
- Flat 5, 2 Tyers Gate, London
- Flat 2, 2 Tyers Gate, London
- Flat 2, 2 Tyers Gate, London
- 14 Snowsfields, London, Southwark
- 14 Snowsfields, London, Southwark

- 54 Guy Street, London, Southwark
- 54 Guy Street, London, Southwark
- 92 Snowsfields, London, Southwark
- 92 Snowsfields, London, Southwark
- 40 Hamilton Square, Kipling Street, London
- 40 Hamilton Square, Kipling Street, London
- 33 Hamilton Square, Kipling Street, London
- 33 Hamilton Square, Kipling Street, London
- 20 Hamilton Square, Kipling Street, London
- 20 Hamilton Square, Kipling Street, London
- Flat 9, Sarah Swift House, Kipling Street
- Flat 9, Sarah Swift House, Kipling Street
- Flat 1, Sarah Swift House, Kipling Street
- Flat 1, Sarah Swift House, Kipling Street
- Margret House, 111 Snowsfields, London
- Margret House, 111 Snowsfields, London
- 75 Bermondsey Street, London, Southwark
- 75 Bermondsey Street, London, Southwark
- Flat 4, 79 Bermondsey Street, London
- Flat 4, 79 Bermondsey Street, London
- Horseshoe, 26 Melior Street, London
- Horseshoe, 26 Melior Street, London
- 60A Bermondsey Street, London, Southwark
- 60A Bermondsey Street, London, Southwark
- Flat 7, 64 Weston Street, London
- Flat 7, 64 Weston Street, London
- 6 Tyers Gate, London, Southwark
- 6 Tyers Gate, London, Southwark
- 4 Crucifix Lane, London, Southwark
- 4 Crucifix Lane, London, Southwark
- 58 Tyers Estate, Bermondsey Street, London
- 58 Tyers Estate, Bermondsey Street, London
- 44 Tyers Estate, Bermondsey Street, London
- 44 Tyers Estate, Bermondsey Street, London
- 28 Tyers Estate, Bermondsey Street, London
- 28 Tyers Estate, Bermondsey Street, London
- 24 Tyers Estate, Bermondsey Street, London
- 24 Tyers Estate, Bermondsey Street, London
- Flat 5, 4B Tyers Gate, London
- Flat 5, 4B Tyers Gate, London
- 5 Porlock Street, London, Southwark
- 5 Porlock Street, London, Southwark
- 90 Crosby Row, London, Southwark
- 90 Crosby Row, London, Southwark
- 40 Crosby Row, London, Southwark
- 40 Crosby Row, London, Southwark

- 12 Melior Street, London, Southwark
- 12 Melior Street, London, Southwark
- London Bridge Station, 48 Tooley Street, London
- London Bridge Station, 48 Tooley Street, London
- Unit 144, London Bridge Station, London Bridge Street
- Unit 144, London Bridge Station, London Bridge Street
- Unit 115, London Bridge Station, London Bridge Street
- Unit 115, London Bridge Station, London Bridge Street
- Unit 114, London Bridge Station, London Bridge Street
- Unit 114, London Bridge Station, London Bridge Street
- Flat 7, Lion Court, 12 Shand Street
- Flat 7, Lion Court, 12 Shand Street
- 141 Guinness Court, Snowsfields, London
- 141 Guinness Court, Snowsfields, London
- 95 Guinness Court, Snowsfields, London
- 95 Guinness Court, Snowsfields, London
- 79 Guinness Court, Snowsfields, London
- 79 Guinness Court, Snowsfields, London
- 69 Guinness Court, Snowsfields, London
- 69 Guinness Court, Snowsfields, London
- Flat 5, St Lukes Court, 124-126 Tooley Street
- Flat 5, St Lukes Court, 124-126 Tooley Street
- Flat 2, St Lukes Court, 124-126 Tooley Street
- Flat 2, St Lukes Court, 124-126 Tooley Street
- 109 Guinness Court, Snowsfields, London
- 109 Guinness Court, Snowsfields, London
- 8 Guinness Court, Snowsfields, London
- 8 Guinness Court, Snowsfields, London
- 50 Guinness Court, Snowsfields, London
- 50 Guinness Court, Snowsfields, London
- 48 Guinness Court, Snowsfields, London
- 48 Guinness Court, Snowsfields, London
- 32 Guinness Court, Snowsfields, London
- 32 Guinness Court, Snowsfields, London
- 30 Guinness Court, Snowsfields, London
- 30 Guinness Court, Snowsfields, London
- 22 Guinness Court, Snowsfields, London
- 22 Guinness Court, Snowsfields, London
- 21 Bridgewalk Heights, 80 Weston Street, London
- 21 Bridgewalk Heights, 80 Weston Street, London
- 15 Bridgewalk Heights, 80 Weston Street, London
- 15 Bridgewalk Heights, 80 Weston Street, London
- Flat 7, 40 Snowsfields, London
- Flat 7, 40 Snowsfields, London
- 75-79 St Thomas Street, London, Southwark
- 75-79 St Thomas Street, London, Southwark

- Flat 2, 40 Snowsfields, London
- Flat 2, 40 Snowsfields, London
- Flat 4, 92A Snowsfields, London
- Flat 4, 92A Snowsfields, London
- 4 Black Swan Yard, London, Southwark
- 4 Black Swan Yard, London, Southwark
- 74 Lockyer Estate, Kipling Street, London
- 74 Lockyer Estate, Kipling Street, London
- 9 Hamilton Square, Kipling Street, London
- 9 Hamilton Square, Kipling Street, London
- Flat 11, 70 Weston Street, London
- Flat 11, 70 Weston Street, London
- Flat 10, 70 Weston Street, London
- Flat 10, 70 Weston Street, London
- 6 Hamilton Square, Kipling Street, London
- 6 Hamilton Square, Kipling Street, London
- 3 Hamilton Square, Kipling Street, London
- 3 Hamilton Square, Kipling Street, London
- 1 Hamilton Square, Kipling Street, London
- 1 Hamilton Square, Kipling Street, London
- Flat 19, Sarah Swift House, Kipling Street
- Flat 19, Sarah Swift House, Kipling Street
- Flat 16, Sarah Swift House, Kipling Street
- Flat 16, Sarah Swift House, Kipling Street
- Flat 13, Sarah Swift House, Kipling Street
- Flat 13, Sarah Swift House, Kipling Street
- 81 Bermondsey Street, London, Southwark
- 81 Bermondsey Street, London, Southwark
- Flat 5, 79 Bermondsey Street, London
- Flat 5, 79 Bermondsey Street, London
- Flat 8, 72 Weston Street, London
- Flat 8, 72 Weston Street, London
- 80A Bermondsey Street, London, Southwark
- 80A Bermondsey Street, London, Southwark
- 65 Tyers Estate, Bermondsey Street, London
- 65 Tyers Estate, Bermondsey Street, London
- 50 Tyers Estate, Bermondsey Street, London
- 50 Tyers Estate, Bermondsey Street, London
- 49 Tyers Estate, Bermondsey Street, London
- 49 Tyers Estate, Bermondsey Street, London
- 47 Tyers Estate, Bermondsey Street, London
- 47 Tyers Estate, Bermondsey Street, London
- 32 Tyers Estate, Bermondsey Street, London
- 32 Tyers Estate, Bermondsey Street, London
- 9 Porlock Street, London, Southwark
- 9 Porlock Street, London, Southwark

- 7 Porlock Street, London, Southwark
- 7 Porlock Street, London, Southwark
- 20 Guy Street, London, Southwark
- 20 Guy Street, London, Southwark
- 76 Crosby Row, London, Southwark
- 76 Crosby Row, London, Southwark
- 36 Crosby Row, London, Southwark
- 36 Crosby Row, London, Southwark
- 28 Crosby Row, London, Southwark
- 28 Crosby Row, London, Southwark
- 20 Crosby Row, London, Southwark
- 20 Crosby Row, London, Southwark
- London Bridge Station, 84 Tooley Street, London
- London Bridge Station, 84 Tooley Street, London
- Unit 266, London Bridge Station, London Bridge Street
- Unit 266, London Bridge Station, London Bridge Street
- Unit 135, London Bridge Station, London Bridge Street
- Unit 135, London Bridge Station, London Bridge Street
- Unit 124, London Bridge Station, London Bridge Street
- Unit 124, London Bridge Station, London Bridge Street
- Flat 22, Marklake Court, 95 Weston Street
- Flat 22, Marklake Court, 95 Weston Street
- Flat 2, Marklake Court, 95 Weston Street
- Flat 2, Marklake Court, 95 Weston Street
- 6 Carmarthen Place, London, Southwark
- 6 Carmarthen Place, London, Southwark
- Apartment 6, 118 Tooley Street, London
- Apartment 6, 118 Tooley Street, London
- Unit 307, Shard Arcade, Joiner Street
- Unit 307, Shard Arcade, Joiner Street
- Globe House, 37 Bermondsey Street, London
- Globe House, 37 Bermondsey Street, London
- Flat 4, 123 Snowsfields, London
- Flat 4, 123 Snowsfields, London
- Part First And Second Floors, 7-13 Melior Street, London
- Part First And Second Floors, 7-13 Melior Street, London
- Railway Arch 6, Crucifix Lane, London
- Railway Arch 6, Crucifix Lane, London
- First Floor Flat Rear Of, 96 Tooley Street, London
- First Floor Flat Rear Of, 96 Tooley Street, London
- Apartment 5, 8 Melior Street, London
- Apartment 5, 8 Melior Street, London
- Unit 1, 8 Melior Street, London
- Unit 1, 8 Melior Street, London
- Apartment 12, 36 Snowsfields, London
- Apartment 12, 36 Snowsfields, London

- Apartment 10, 36 Snowsfields, London
- Apartment 10, 36 Snowsfields, London
- Flat A, 17A Magdalen Street, London
- Flat A, 17A Magdalen Street, London
- Part Ground And First Floor, 75 Weston Street, London
- Part Ground And First Floor, 75 Weston Street, London
- The View From The Shard, The Shard, Joiner Street
- The View From The Shard, The Shard, Joiner Street
- Railway Arch 891, Holyrood Street, London
- Railway Arch 891, Holyrood Street, London
- Apartment 3, The Shard, 31 St Thomas Street
- Apartment 3, The Shard, 31 St Thomas Street
- 58 Bermondsey Street, London, Southwark
- 58 Bermondsey Street, London, Southwark
- Flat 3, 54 Weston Street, London
- Flat 3, 54 Weston Street, London
- Flat 10, More Copper House, 14-16 Magdalen Street
- Flat 10, More Copper House, 14-16 Magdalen Street
- Flat 4, 1 Shand Street, London
- Flat 4, 1 Shand Street, London
- Unit 24, 52 Bermondsey Street, London
- Unit 24, 52 Bermondsey Street, London
- Shakti, The Tanneries, 55 Bermondsey Street
- Shakti, The Tanneries, 55 Bermondsey Street
- First Floor, 122 Tooley Street, London
- First Floor, 122 Tooley Street, London
- Flat 15, Kamen House, 17-21 Magdalen Street
- Flat 15, Kamen House, 17-21 Magdalen Street
- Flat 5, Kamen House, 17-21 Magdalen Street
- Flat 5, Kamen House, 17-21 Magdalen Street
- Basement And Ground Floor, 106 Tooley Street, London
- Basement And Ground Floor, 106 Tooley Street, London
- Fourth Floor, 9 Holyrood Street, London
- Fourth Floor, 9 Holyrood Street, London
- 2 Raquel Court, 147 Snowsfields, London
- 2 Raquel Court, 147 Snowsfields, London
- Apartment 7, 36 Snowsfields, London
- Apartment 7, 36 Snowsfields, London
- Flat 15, 70 Weston Street, London
- Flat 15, 70 Weston Street, London
- Flat 2, 85 Weston Street, London
- Flat 2, 85 Weston Street, London
- Flat 2, 1 Shand Street, London
- Flat 2, 1 Shand Street, London
- Flat 5, 40 Snowsfields, London
- Flat 5, 40 Snowsfields, London

- 18 Snowfields, London, Southwark
- 18 Snowfields, London, Southwark
- 10 Crucifix Lane, London, Southwark
- 10 Crucifix Lane, London, Southwark
- 50 Kipling Street, London, Southwark
- 50 Kipling Street, London, Southwark
- Unit 133, London Bridge Station, London Bridge Street
- Unit 133, London Bridge Station, London Bridge Street
- 145 Guinness Court, Snowfields, London
- 145 Guinness Court, Snowfields, London
- 67 Guinness Court, Snowfields, London
- 67 Guinness Court, Snowfields, London
- 40 Guinness Court, Snowfields, London
- 40 Guinness Court, Snowfields, London
- Unit 21, 56 Bermondsey Street, London
- Unit 21, 56 Bermondsey Street, London
- Sati, The Tanneries, 55 Bermondsey Street
- Sati, The Tanneries, 55 Bermondsey Street
- Level 17A, The Shard, 32 London Bridge Street
- Level 17A, The Shard, 32 London Bridge Street
- 73 Lockyer Estate, Kipling Street, London
- 73 Lockyer Estate, Kipling Street, London
- Flat 6, Lion Court, 12 Shand Street
- Flat 6, Lion Court, 12 Shand Street
- 10 Hamilton Square, Kipling Street, London
- 10 Hamilton Square, Kipling Street, London
- Unit 21, 52 Bermondsey Street, London
- Unit 21, 52 Bermondsey Street, London
- Apartment 25, 36 Snowfields, London
- Apartment 25, 36 Snowfields, London
- Guys Hospital Cancer Centre, Great Maze Pond, London
- Guys Hospital Cancer Centre, Great Maze Pond, London
- Unit 138 Station Reception, London Bridge Station, London
Bridge Street
- Unit 138 Station Reception, London Bridge Station, London
Bridge Street
- 59 Tyers Estate, Bermondsey Street, London
- 59 Tyers Estate, Bermondsey Street, London
- 63 Guinness Court, Snowfields, London
- 63 Guinness Court, Snowfields, London
- Flat 19, Kamen House, 17-21 Magdalen Street
- Flat 19, Kamen House, 17-21 Magdalen Street
- Flat 17, Marklake Court, 95 Weston Street
- Flat 17, Marklake Court, 95 Weston Street
- Room 9, Lowri Building, 112-114 Tooley Street
- Room 9, Lowri Building, 112-114 Tooley Street

- Apartment 9, 118 Tooley Street, London
- Apartment 9, 118 Tooley Street, London
- Flat 4, 83 Weston Street, London
- Flat 4, 83 Weston Street, London
- Unit 312, Shard Arcade, Joiner Street
- Unit 312, Shard Arcade, Joiner Street
- Unit 306, Shard Arcade, Joiner Street
- Unit 306, Shard Arcade, Joiner Street
- Unit 302, Shard Arcade, Joiner Street
- Unit 302, Shard Arcade, Joiner Street
- Apartment 22, 36 Snowsfields, London
- Apartment 22, 36 Snowsfields, London
- Apartment 13, 36 Snowsfields, London
- Apartment 13, 36 Snowsfields, London
- Part Fourth Floor, 39-45 Bermondsey Street, London
- Part Fourth Floor, 39-45 Bermondsey Street, London
- Top Floor Flat, 114 Tooley Street, London
- Top Floor Flat, 114 Tooley Street, London
- Office A First Floor, 7 Holyrood Street, London
- Office A First Floor, 7 Holyrood Street, London
- Level 22, The Shard, 32 London Bridge Street
- Level 22, The Shard, 32 London Bridge Street
- Level 18, The Shard, 32 London Bridge Street
- Level 18, The Shard, 32 London Bridge Street
- Level 11, The Shard, 32 London Bridge Street
- Level 11, The Shard, 32 London Bridge Street
- Level 10, The Shard, 32 London Bridge Street
- Level 10, The Shard, 32 London Bridge Street
- 52 Weston Street, London, Southwark
- 52 Weston Street, London, Southwark
- Flat 5, More Copper House, 14-16 Magdalen Street
- Flat 5, More Copper House, 14-16 Magdalen Street
- Flat 2, More Copper House, 14-16 Magdalen Street
- Flat 2, More Copper House, 14-16 Magdalen Street
- 160 Tooley Street, London, Southwark
- 160 Tooley Street, London, Southwark
- Flat 2 Counting House, Guys Hospital, Great Maze Pond
- Flat 2 Counting House, Guys Hospital, Great Maze Pond
- Unit 1, 54 Bermondsey Street, London
- Unit 1, 54 Bermondsey Street, London
- Third Floor, Shiva The Tannery, Bermondsey Street
- Third Floor, Shiva The Tannery, Bermondsey Street
- Ground Floor Room 4, 77 Weston Street, London
- Ground Floor Room 4, 77 Weston Street, London
- Flat 2, 16 Melior Street, London
- Flat 2, 16 Melior Street, London

- 17 Hardwidge Street, London, Southwark
- 17 Hardwidge Street, London, Southwark
- Second Floor East, 136-148 Tooley Street, London
- Second Floor East, 136-148 Tooley Street, London
- Flat 2, 104 Tooley Street, London
- Flat 2, 104 Tooley Street, London
- Third Floor, 9 Holyrood Street, London
- Third Floor, 9 Holyrood Street, London
- Basement, 7 Holyrood Street, London
- Basement, 7 Holyrood Street, London
- First Floor, 1-7 Fenning Street, London
- First Floor, 1-7 Fenning Street, London
- Basement And First To Third Floors, 46 - 54 Bermondsey Street, London
- Basement And First To Third Floors, 46 - 54 Bermondsey Street, London
- Mandel Katz And Brosnan Llp, The Shard, 32 London Bridge Street
- Mandel Katz And Brosnan Llp, The Shard, 32 London Bridge Street
- 66 Snowsfields, London, Southwark
- 66 Snowsfields, London, Southwark
- Level 29, The Shard, 32 London Bridge Street
- Level 29, The Shard, 32 London Bridge Street
- Unit 113, London Bridge Station, London Bridge Street
- Unit 113, London Bridge Station, London Bridge Street
- 42 Guinness Court, Snowsfields, London
- 42 Guinness Court, Snowsfields, London
- 9 Bridgewalk Heights, 80 Weston Street, London
- 9 Bridgewalk Heights, 80 Weston Street, London
- Apartment 17, 36 Snowsfields, London
- Apartment 17, 36 Snowsfields, London
- Flat 7, 2 Tyers Gate, London
- Flat 7, 2 Tyers Gate, London
- Flat 2, 4B Tyers Gate, London
- Flat 2, 4B Tyers Gate, London
- 3 Porlock Street, London, Southwark
- 3 Porlock Street, London, Southwark
- Flat 15, Marklake Court, 95 Weston Street
- Flat 15, Marklake Court, 95 Weston Street
- Flat 29, Lion Court, 12 Shand Street
- Flat 29, Lion Court, 12 Shand Street
- Room 1, Lowri Building, 112-114 Tooley Street
- Room 1, Lowri Building, 112-114 Tooley Street
- Flat 5, Lion Court, 12 Shand Street
- Flat 5, Lion Court, 12 Shand Street

- 27 Guinness Court, Snowsfields, London
- 27 Guinness Court, Snowsfields, London
- 10 Guinness Court, Snowsfields, London
- 10 Guinness Court, Snowsfields, London
- Flat 30, Kamen House, 17-21 Magdalen Street
- Flat 30, Kamen House, 17-21 Magdalen Street
- 1A Magdalen Street, London, Southwark
- 1A Magdalen Street, London, Southwark
- Flat 12, St Lukes Court, 124-126 Tooley Street
- Flat 12, St Lukes Court, 124-126 Tooley Street
- 64 Guinness Court, Snowsfields, London
- 64 Guinness Court, Snowsfields, London
- Flat 3, 48 Kipling Street, London
- Flat 3, 48 Kipling Street, London
- 1-7 Snowsfields, London, Southwark
- 1-7 Snowsfields, London, Southwark
- 26 Oxford Drive, London, Southwark
- 26 Oxford Drive, London, Southwark
- Flat 4 West Wing Nurses Home, Guys Hospital, Great Maze Pond
- Flat 4 West Wing Nurses Home, Guys Hospital, Great Maze Pond
- Flat 4, 54 Weston Street, London
- Flat 4, 54 Weston Street, London
- Flat 8, Kamen House, 17-21 Magdalen Street
- Flat 8, Kamen House, 17-21 Magdalen Street
- Ground Floor, Bramah House, 65-71 Bermondsey Street
- Ground Floor, Bramah House, 65-71 Bermondsey Street
- Ground Floor, 18-20 Crucifix Lane, London
- Ground Floor, 18-20 Crucifix Lane, London
- The Glasshouse, 3 Melior Place, London
- The Glasshouse, 3 Melior Place, London
- 14 Melior Street, London, Southwark
- 14 Melior Street, London, Southwark
- Unit 1, Railway Arches 893 And 894, Holyrood Street
- Unit 1, Railway Arches 893 And 894, Holyrood Street
- Basement, Shand House, 14-20 Shand Street
- Basement, Shand House, 14-20 Shand Street
- First Floor, 8 Holyrood Street, London
- First Floor, 8 Holyrood Street, London
- Ground Floor, 61 Bermondsey Street, London
- Ground Floor, 61 Bermondsey Street, London
- Flat 21, Marklake Court, 95 Weston Street
- Flat 21, Marklake Court, 95 Weston Street
- Unit 270, London Bridge Station, London Bridge Street
- Unit 270, London Bridge Station, London Bridge Street

- Unit 111, London Bridge Station, London Bridge Street
- Unit 111, London Bridge Station, London Bridge Street
- Unit 109, London Bridge Station, London Bridge Street
- Unit 109, London Bridge Station, London Bridge Street
- Flat 9, Marklake Court, 95 Weston Street
- Flat 9, Marklake Court, 95 Weston Street
- Flat 3, 72 Weston Street, London
- Flat 3, 72 Weston Street, London
- 128 Tooley Street, London, Southwark
- 128 Tooley Street, London, Southwark
- Flat 6, 79 Bermondsey Street, London
- Flat 6, 79 Bermondsey Street, London
- Flat 8, 48 Kipling Street, London
- Flat 8, 48 Kipling Street, London
- Flat 5, 48 Kipling Street, London
- Flat 5, 48 Kipling Street, London
- 32 Oxford Drive, London, Southwark
- 32 Oxford Drive, London, Southwark
- 7 Tyers Estate, Bermondsey Street, London
- 7 Tyers Estate, Bermondsey Street, London
- 8 Hamilton Square, Kipling Street, London
- 8 Hamilton Square, Kipling Street, London
- 39 Hamilton Square, Kipling Street, London
- 39 Hamilton Square, Kipling Street, London
- 34 Tyers Estate, Bermondsey Street, London
- 34 Tyers Estate, Bermondsey Street, London
- 23 Tyers Estate, Bermondsey Street, London
- 23 Tyers Estate, Bermondsey Street, London
- Hca Outpatients And Diagnostics, The Shard, St Thomas Street
- Hca Outpatients And Diagnostics, The Shard, St Thomas Street
- 110 Guinness Court, Snowsfields, London
- 110 Guinness Court, Snowsfields, London
- 104 Guinness Court, Snowsfields, London
- 104 Guinness Court, Snowsfields, London
- 45 Guinness Court, Snowsfields, London
- 45 Guinness Court, Snowsfields, London
- 4 Guinness Court, Snowsfields, London
- 4 Guinness Court, Snowsfields, London
- 31 Guinness Court, Snowsfields, London
- 31 Guinness Court, Snowsfields, London
- 32 Bridgewalk Heights, 80 Weston Street, London
- 32 Bridgewalk Heights, 80 Weston Street, London
- 13A Bridgewalk Heights, 80 Weston Street, London
- 13A Bridgewalk Heights, 80 Weston Street, London

- 11 Bridgework Heights, 80 Weston Street, London
- 11 Bridgework Heights, 80 Weston Street, London
- 52 Crosby Row, London, Southwark
- 52 Crosby Row, London, Southwark
- Apartment 6, 8 Melior Street, London
- Apartment 6, 8 Melior Street, London
- Apartment 3, 8 Melior Street, London
- Apartment 3, 8 Melior Street, London
- Flat 2, Sarah Swift House, Kipling Street
- Flat 2, Sarah Swift House, Kipling Street
- Flat 6, 2 Tyers Gate, London
- Flat 6, 2 Tyers Gate, London
- Apartment 14, 36 Snowsfields, London
- Apartment 14, 36 Snowsfields, London
- Apartment 8, 36 Snowsfields, London
- Apartment 8, 36 Snowsfields, London
- Part Ground Floor, 7-13 Melior Street, London
- Part Ground Floor, 7-13 Melior Street, London
- 5 Holyrood Street, London, Southwark
- 5 Holyrood Street, London, Southwark
- 69 Lockyer Estate, Kipling Street, London
- 69 Lockyer Estate, Kipling Street, London
- 33 Tyers Estate, Bermondsey Street, London
- 33 Tyers Estate, Bermondsey Street, London
- 60 Crosby Row, London, Southwark
- 60 Crosby Row, London, Southwark
- London Bridge Station, 71 St Thomas Street, London
- London Bridge Station, 71 St Thomas Street, London
- 53 Oxford Drive, London, Southwark
- 53 Oxford Drive, London, Southwark
- 114 Guinness Court, Snowsfields, London
- 114 Guinness Court, Snowsfields, London
- Unit 10, Shard Arcade, Joiner Street
- Unit 10, Shard Arcade, Joiner Street
- Apartment 4, The Shard, 31 St Thomas Street
- Apartment 4, The Shard, 31 St Thomas Street
- Apartment 9, 36 Snowsfields, London
- Apartment 9, 36 Snowsfields, London
- First Floor, 61 Bermondsey Street, London
- First Floor, 61 Bermondsey Street, London
- Unit 134, London Bridge Station, London Bridge Street
- Unit 134, London Bridge Station, London Bridge Street
- 134 Guinness Court, Snowsfields, London
- 134 Guinness Court, Snowsfields, London
- 1 Tyers Estate, Bermondsey Street, London
- 1 Tyers Estate, Bermondsey Street, London

- 19 Hamilton Square, Kipling Street, London
- 19 Hamilton Square, Kipling Street, London
- Flat 27, Marklake Court, 95 Weston Street
- Flat 27, Marklake Court, 95 Weston Street
- Flat 9, Lion Court, 12 Shand Street
- Flat 9, Lion Court, 12 Shand Street
- Part Ground Floor And Ninth Floor, Capital House, 42

Weston Street

- Part Ground Floor And Ninth Floor, Capital House, 42

Weston Street

- 172 Tooley Street, London, Southwark
- 172 Tooley Street, London, Southwark
- Unit 267, London Bridge Station, London Bridge Street
- Unit 267, London Bridge Station, London Bridge Street
- Unit 132, London Bridge Station, London Bridge Street
- Unit 132, London Bridge Station, London Bridge Street
- Unit 105, London Bridge Station, London Bridge Street
- Unit 105, London Bridge Station, London Bridge Street
- Flat 3, 85 Weston Street, London
- Flat 3, 85 Weston Street, London
- 25 Bridgewalk Heights, 80 Weston Street, London
- 25 Bridgewalk Heights, 80 Weston Street, London
- Apartment 24, 36 Snowsfields, London
- Apartment 24, 36 Snowsfields, London
- 36 Guinness Court, Snowsfields, London
- 36 Guinness Court, Snowsfields, London
- 42 Crosby Row, London, Southwark
- 42 Crosby Row, London, Southwark
- 120 Tooley Street, London, Southwark
- 120 Tooley Street, London, Southwark
- Unit 33, 52 Bermondsey Street, London
- Unit 33, 52 Bermondsey Street, London
- Unit 2, The Grain Stores, 70 Weston Street
- Unit 2, The Grain Stores, 70 Weston Street
- 40-40A Snowsfields, London, Southwark
- 40-40A Snowsfields, London, Southwark
- Flat 12, 64 Weston Street, London
- Flat 12, 64 Weston Street, London
- Flat 3, 38 Snowsfields, London
- Flat 3, 38 Snowsfields, London
- Apartment 1, 88A Tooley Street, London
- Apartment 1, 88A Tooley Street, London
- London Bridge Station, 59 St Thomas Street, London
- London Bridge Station, 59 St Thomas Street, London
- Unit 6, Railway Arches 883 And 884, Holyrood Street
- Unit 6, Railway Arches 883 And 884, Holyrood Street

- London Bridge Station, 58 Tooley Street, London
- London Bridge Station, 58 Tooley Street, London
- 20 Snowsfields, London, Southwark
- 20 Snowsfields, London, Southwark
- 53 Tyers Estate, Bermondsey Street, London
- 53 Tyers Estate, Bermondsey Street, London
- 66 Crosby Row, London, Southwark
- 66 Crosby Row, London, Southwark
- 36 Oxford Drive, London, Southwark
- 36 Oxford Drive, London, Southwark
- Fourth Floor, 7 Holyrood Street, London
- Fourth Floor, 7 Holyrood Street, London
- Unit 15, Shard Arcade, Joiner Street
- Unit 15, Shard Arcade, Joiner Street
- Room 318, Guys Hospital, Great Maze Pond
- Room 318, Guys Hospital, Great Maze Pond
- 2 Porlock Street, London, Southwark
- 2 Porlock Street, London, Southwark
- 14 Crosby Row, London, Southwark
- 14 Crosby Row, London, Southwark
- Flat 8, 38 Snowsfields, London
- Flat 8, 38 Snowsfields, London
- First Floor, Shand House, 14-20 Shand Street
- First Floor, Shand House, 14-20 Shand Street
- Unit 311, Shard Arcade, Joiner Street
- Unit 311, Shard Arcade, Joiner Street
- Unit 308, Shard Arcade, Joiner Street
- Unit 308, Shard Arcade, Joiner Street
- Unit 303, Shard Arcade, Joiner Street
- Unit 303, Shard Arcade, Joiner Street
- London Bridge Station, 49 St Thomas Street, London
- London Bridge Station, 49 St Thomas Street, London
- Unit 143, London Bridge Station, London Bridge Street
- Unit 143, London Bridge Station, London Bridge Street
- Unit 141, London Bridge Station, London Bridge Street
- Unit 141, London Bridge Station, London Bridge Street
- Flat 3, Marklake Court, 95 Weston Street
- Flat 3, Marklake Court, 95 Weston Street
- Apartment 5, 118 Tooley Street, London
- Apartment 5, 118 Tooley Street, London
- Flat 6, 70 Weston Street, London
- Flat 6, 70 Weston Street, London
- Flat 3, 4B Tyers Gate, London
- Flat 3, 4B Tyers Gate, London
- Flat 1, 98 Tooley Street, London
- Flat 1, 98 Tooley Street, London

- Flat 19, 70 Weston Street, London
- Flat 19, 70 Weston Street, London
- Flat 2, 62 Weston Street, London
- Flat 2, 62 Weston Street, London
- 25 Oxford Drive, London, Southwark
- 25 Oxford Drive, London, Southwark
- 123 Guinness Court, Snowsfields, London
- 123 Guinness Court, Snowsfields, London
- 67 Tyers Estate, Bermondsey Street, London
- 67 Tyers Estate, Bermondsey Street, London
- Flat 20, Lion Court, 28 Magdalen Street
- Flat 20, Lion Court, 28 Magdalen Street
- 62 Tyers Estate, Bermondsey Street, London
- 62 Tyers Estate, Bermondsey Street, London
- 56 Tyers Estate, Bermondsey Street, London
- 56 Tyers Estate, Bermondsey Street, London
- 120 Guinness Court, Snowsfields, London
- 120 Guinness Court, Snowsfields, London
- 41 Hamilton Square, Kipling Street, London
- 41 Hamilton Square, Kipling Street, London
- 97 Guinness Court, Snowsfields, London
- 97 Guinness Court, Snowsfields, London
- 86 Guinness Court, Snowsfields, London
- 86 Guinness Court, Snowsfields, London
- 77 Guinness Court, Snowsfields, London
- 77 Guinness Court, Snowsfields, London
- 40 Tyers Estate, Bermondsey Street, London
- 40 Tyers Estate, Bermondsey Street, London
- 31 Tyers Estate, Bermondsey Street, London
- 31 Tyers Estate, Bermondsey Street, London
- 47 Guinness Court, Snowsfields, London
- 47 Guinness Court, Snowsfields, London
- 37 Guinness Court, Snowsfields, London
- 37 Guinness Court, Snowsfields, London
- 26 Guinness Court, Snowsfields, London
- 26 Guinness Court, Snowsfields, London
- 30 Bridgewalk Heights, 80 Weston Street, London
- 30 Bridgewalk Heights, 80 Weston Street, London
- 22 Bridgewalk Heights, 80 Weston Street, London
- 22 Bridgewalk Heights, 80 Weston Street, London
- Third Floor, Shand House, 14-20 Shand Street
- Third Floor, Shand House, 14-20 Shand Street
- 4 Guy Street, London, Southwark
- 4 Guy Street, London, Southwark
- Flat 5, Sarah Swift House, Kipling Street
- Flat 5, Sarah Swift House, Kipling Street

- Flat 17, Lion Court, 12 Shand Street
- Flat 17, Lion Court, 12 Shand Street
- Flat 3, 2 Tyers Gate, London
- Flat 3, 2 Tyers Gate, London
- Apartment 11, 36 Snowsfields, London
- Apartment 11, 36 Snowsfields, London
- 154 Tooley Street, London, Southwark
- 154 Tooley Street, London, Southwark
- 54 Oxford Drive, London, Southwark
- 54 Oxford Drive, London, Southwark
- Level 25, The Shard, 32 London Bridge Street
- Level 25, The Shard, 32 London Bridge Street
- Apartment 7, The Shard, 31 St Thomas Street
- Apartment 7, The Shard, 31 St Thomas Street
- 102A Tooley Street, London, Southwark
- 102A Tooley Street, London, Southwark
- Third Floor, 92-94 Tooley Street, London
- Third Floor, 92-94 Tooley Street, London
- Unit 11, 56 Bermondsey Street, London
- Unit 11, 56 Bermondsey Street, London
- Flat 3, 16 Melior Street, London
- Flat 3, 16 Melior Street, London
- Flat 24, Kamen House, 17-21 Magdalen Street
- Flat 24, Kamen House, 17-21 Magdalen Street
- Ground Floor, Natraj The Tannery, Bermondsey Street
- Ground Floor, Natraj The Tannery, Bermondsey Street
- First Floor And Second Floor, Shiva The Tannery,
Bermondsey Street
- First Floor And Second Floor, Shiva The Tannery,
Bermondsey Street
- Rooms 2 To 6 Second Floor, 3-5 Hardwidge Street,
London
- Rooms 2 To 6 Second Floor, 3-5 Hardwidge Street,
London
- Basement And Ground Floor, 98 Tooley Street, London
- Basement And Ground Floor, 98 Tooley Street, London
- Basement And Ground Floor, 90 Tooley Street, London
- Basement And Ground Floor, 90 Tooley Street, London
- Flat 2, 8 Tyers Gate, London
- Flat 2, 8 Tyers Gate, London
- 2-3 Black Swan Yard, London, Southwark
- 2-3 Black Swan Yard, London, Southwark
- Railway Arch 22, Bermondsey Street, London
- Railway Arch 22, Bermondsey Street, London
- Shipwrights Arms, 88 Tooley Street, London
- Shipwrights Arms, 88 Tooley Street, London

- 49 Oxford Drive, London, Southwark
- 49 Oxford Drive, London, Southwark
- 37 Oxford Drive, London, Southwark
- 37 Oxford Drive, London, Southwark
- 29 Oxford Drive, London, Southwark
- 29 Oxford Drive, London, Southwark
- 13 Oxford Drive, London, Southwark
- 13 Oxford Drive, London, Southwark
- 17 Bermondsey Street, London, Southwark
- 17 Bermondsey Street, London, Southwark
- 144 Guinness Court, Snowsfields, London
- 144 Guinness Court, Snowsfields, London
- 129 Guinness Court, Snowsfields, London
- 129 Guinness Court, Snowsfields, London
- 62 Guinness Court, Snowsfields, London
- 62 Guinness Court, Snowsfields, London
- 115 Guinness Court, Snowsfields, London
- 115 Guinness Court, Snowsfields, London
- 112 Guinness Court, Snowsfields, London
- 112 Guinness Court, Snowsfields, London
- 101 Guinness Court, Snowsfields, London
- 101 Guinness Court, Snowsfields, London
- 51 Guinness Court, Snowsfields, London
- 51 Guinness Court, Snowsfields, London
- 33 Guinness Court, Snowsfields, London
- 33 Guinness Court, Snowsfields, London
- 28 Guinness Court, Snowsfields, London
- 28 Guinness Court, Snowsfields, London
- 25 Guinness Court, Snowsfields, London
- 25 Guinness Court, Snowsfields, London
- 16 Guinness Court, Snowsfields, London
- 16 Guinness Court, Snowsfields, London
- 28 Bridgewalk Heights, 80 Weston Street, London
- 28 Bridgewalk Heights, 80 Weston Street, London
- 26 Bridgewalk Heights, 80 Weston Street, London
- 26 Bridgewalk Heights, 80 Weston Street, London
- 20 Bridgewalk Heights, 80 Weston Street, London
- 20 Bridgewalk Heights, 80 Weston Street, London
- Flat 6, 40 Snowsfields, London
- Flat 6, 40 Snowsfields, London
- Flat 4, 40 Snowsfields, London
- Flat 4, 40 Snowsfields, London
- Flat 2, 42 Snowsfields, London
- Flat 2, 42 Snowsfields, London
- 56 Bermondsey Street, London, Southwark
- 56 Bermondsey Street, London, Southwark

- Flat 6, 48 Kipling Street, London
- Flat 6, 48 Kipling Street, London
- Flat 1, 48 Kipling Street, London
- Flat 1, 48 Kipling Street, London
- 95 Snowfields, London, Southwark
- 95 Snowfields, London, Southwark
- 7 Hamilton Square, Kipling Street, London
- 7 Hamilton Square, Kipling Street, London
- 38 Hamilton Square, Kipling Street, London
- 38 Hamilton Square, Kipling Street, London
- 22 Hamilton Square, Kipling Street, London
- 22 Hamilton Square, Kipling Street, London
- 18 Hamilton Square, Kipling Street, London
- 18 Hamilton Square, Kipling Street, London
- Flat 7, Sarah Swift House, Kipling Street
- Flat 7, Sarah Swift House, Kipling Street
- Flat 8, 79 Bermondsey Street, London
- Flat 8, 79 Bermondsey Street, London
- Flat 4, 11 Porlock Street, London
- Flat 4, 11 Porlock Street, London
- London Bridge Station, 3 Joiner Street, London
- London Bridge Station, 3 Joiner Street, London
- Unit 120, London Bridge Station, London Bridge Street
- Unit 120, London Bridge Station, London Bridge Street
- Unit 116, London Bridge Station, London Bridge Street
- Unit 116, London Bridge Station, London Bridge Street
- Unit 106, London Bridge Station, London Bridge Street
- Unit 106, London Bridge Station, London Bridge Street
- Apartment 8, 118 Tooley Street, London
- Apartment 8, 118 Tooley Street, London
- Apartment 2, 118 Tooley Street, London
- Apartment 2, 118 Tooley Street, London
- 56 Guy Street, London, Southwark
- 56 Guy Street, London, Southwark
- Flat 5, 64 Weston Street, London
- Flat 5, 64 Weston Street, London
- 4 Oxford Drive, London, Southwark
- 4 Oxford Drive, London, Southwark
- 137 Guinness Court, Snowfields, London
- 137 Guinness Court, Snowfields, London
- 131 Guinness Court, Snowfields, London
- 131 Guinness Court, Snowfields, London
- Flat 36, Lion Court, 12 Shand Street
- Flat 36, Lion Court, 12 Shand Street
- Flat 27, Lion Court, 12 Shand Street
- Flat 27, Lion Court, 12 Shand Street

- 29 Hamilton Square, Kipling Street, London
- 29 Hamilton Square, Kipling Street, London
- 16 Hamilton Square, Kipling Street, London
- 16 Hamilton Square, Kipling Street, London
- 94 Guinness Court, Snowsfields, London
- 94 Guinness Court, Snowsfields, London
- 65 Guinness Court, Snowsfields, London
- 65 Guinness Court, Snowsfields, London
- 20 Tyers Estate, Bermondsey Street, London
- 20 Tyers Estate, Bermondsey Street, London
- Vintage Yard, 59-63 Bermondsey Street, London
- Vintage Yard, 59-63 Bermondsey Street, London
- 113 Guinness Court, Snowsfields, London
- 113 Guinness Court, Snowsfields, London
- 58 Guinness Court, Snowsfields, London
- 58 Guinness Court, Snowsfields, London
- 55 Guinness Court, Snowsfields, London
- 55 Guinness Court, Snowsfields, London
- 1 Guinness Court, Snowsfields, London
- 1 Guinness Court, Snowsfields, London
- Apartment 29, 36 Snowsfields, London
- Apartment 29, 36 Snowsfields, London
- 44 Crosby Row, London, Southwark
- 44 Crosby Row, London, Southwark
- 30 Crosby Row, London, Southwark
- 30 Crosby Row, London, Southwark
- 1 Melior Place, London, Southwark
- 1 Melior Place, London, Southwark
- Flat 6, St Lukes Court, 124-126 Tooley Street
- Flat 6, St Lukes Court, 124-126 Tooley Street
- Flat 8, 64 Weston Street, London
- Flat 8, 64 Weston Street, London
- 62-66 Bermondsey Street, London, Southwark
- 62-66 Bermondsey Street, London, Southwark
- Ground Floor, 9 Holyrood Street, London
- Ground Floor, 9 Holyrood Street, London
- Flat 11, More Copper House, 14-16 Magdalen Street
- Flat 11, More Copper House, 14-16 Magdalen Street
- Flat 8, More Copper House, 14-16 Magdalen Street
- Flat 8, More Copper House, 14-16 Magdalen Street
- Room 301 West Wing Nurses Home, Guys Hospital, Great Maze Pond
- Room 301 West Wing Nurses Home, Guys Hospital, Great Maze Pond
- Flat 2, 54 Weston Street, London
- Flat 2, 54 Weston Street, London

- Arch 873, 41 Barnham Street, London
- Arch 873, 41 Barnham Street, London
- Flat 3B, 16 Crucifix Lane, London
- Flat 3B, 16 Crucifix Lane, London
- Flat 9, Kamen House, 17-21 Magdalen Street
- Flat 9, Kamen House, 17-21 Magdalen Street
- Basement And Ground Floor, 63 Bermondsey Street,
London
- Basement And Ground Floor, 63 Bermondsey Street,
- Third Floor, 40 Bermondsey Street, London
- Third Floor, 40 Bermondsey Street, London
- Part Third Floor East, 136-148 Tooley Street, London
- Part Third Floor East, 136-148 Tooley Street, London
- Second Floor, 134 Tooley Street, London
- Second Floor, 134 Tooley Street, London
- 80-82 St Thomas Street, London, Southwark
- 80-82 St Thomas Street, London, Southwark
- Second Floor, 77 Weston Street, London
- Second Floor, 77 Weston Street, London
- Part Ground Floor And First Floor, Capital House, 42
Weston Street
- Part Ground Floor And First Floor, Capital House, 42
Weston Street
- 14A The Grain Store, 70 Weston Street, London
- 14A The Grain Store, 70 Weston Street, London
- First Floor, 18-20 Crucifix Lane, London
- First Floor, 18-20 Crucifix Lane, London
- Second Floor, 8 Holyrood Street, London
- Second Floor, 8 Holyrood Street, London
- 45 Oxford Drive, London, Southwark
- 45 Oxford Drive, London, Southwark
- 42 Oxford Drive, London, Southwark
- 42 Oxford Drive, London, Southwark
- Level 1, The Shard, 32 London Bridge Street
- Level 1, The Shard, 32 London Bridge Street
- Room 306 West Wing Nurses Home, Guys Hospital, Great
Maze Pond
- Room 306 West Wing Nurses Home, Guys Hospital, Great
Maze Pond
- Unit 31, 56 Bermondsey Street, London
- Unit 31, 56 Bermondsey Street, London
- Basement And Ground Floor, Shiva The Tannery,
Bermondsey Street
- Basement And Ground Floor, Shiva The Tannery,
Bermondsey Street

- First Floor To Third Floor Part Fourth And Part Fifth Floor, 39-45 Bermondsey Street, London
- First Floor To Third Floor Part Fourth And Part Fifth Floor, 39-45 Bermondsey Street, London
 - Flat 26, Kamen House, 17-21 Magdalen Street
 - Flat 26, Kamen House, 17-21 Magdalen Street
 - Flat 23, Kamen House, 17-21 Magdalen Street
 - Flat 23, Kamen House, 17-21 Magdalen Street
 - Flat 21, Kamen House, 17-21 Magdalen Street
 - Flat 21, Kamen House, 17-21 Magdalen Street
 - Ground Floor, 72 Bermondsey Street, London
 - Ground Floor, 72 Bermondsey Street, London
 - Fashion And Textile Museum, 83 Bermondsey Street,
 - Fashion And Textile Museum, 83 Bermondsey Street,
 - Second Floor, 92-94 Tooley Street, London
 - Second Floor, 92-94 Tooley Street, London
 - Basement, 9 Holyrood Street, London
 - Basement, 9 Holyrood Street, London
 - Part Basement And Part Ground Floor, 46-50 Bermondsey Street, London
 - Part Basement And Part Ground Floor, 46-50 Bermondsey Street, London
 - Roodlane Medical Limited, 136 Tooley Street, London
 - Roodlane Medical Limited, 136 Tooley Street, London
 - Flat 23, Lion Court, 12 Shand Street
 - Flat 23, Lion Court, 12 Shand Street
 - 60 Bermondsey Street, London, Southwark
 - 60 Bermondsey Street, London, Southwark
 - Flat 2, 48 Kipling Street, London
 - Flat 2, 48 Kipling Street, London
 - Flat 28, Lion Court, 28 Magdalen Street
 - Flat 28, Lion Court, 28 Magdalen Street
 - 116 Guinness Court, Snowsfields, London
 - 116 Guinness Court, Snowsfields, London
 - 70 Bermondsey Street, London, Southwark
 - 70 Bermondsey Street, London, Southwark
 - 29 Bridgewalk Heights, 80 Weston Street, London
 - 29 Bridgewalk Heights, 80 Weston Street, London
 - 13 Hamilton Square, Kipling Street, London
 - 13 Hamilton Square, Kipling Street, London
 - 22 Oxford Drive, London, Southwark
 - 22 Oxford Drive, London, Southwark
 - 5 Oxford Drive, London, Southwark
 - 5 Oxford Drive, London, Southwark
 - Flat 12, More Copper House, 14-16 Magdalen Street
 - Flat 12, More Copper House, 14-16 Magdalen Street

- 78 Bermondsey Street, London, Southwark
- 78 Bermondsey Street, London, Southwark
- Railway Arches 6 To 11, Crucifix Lane, London
- Railway Arches 6 To 11, Crucifix Lane, London
- Flat 22, Kamen House, 17-21 Magdalen Street
- Flat 22, Kamen House, 17-21 Magdalen Street
- Apartment 9, 8 Melior Street, London
- Apartment 9, 8 Melior Street, London
- Flat 5, 42 Snowsfields, London
- Flat 5, 42 Snowsfields, London
- Flat 4, 2 Tyers Gate, London
- Flat 4, 2 Tyers Gate, London
- Flat 26, Lion Court, 12 Shand Street
- Flat 26, Lion Court, 12 Shand Street
- 53 Guinness Court, Snowsfields, London
- 53 Guinness Court, Snowsfields, London
- 2 Hamilton Square, Kipling Street, London
- 2 Hamilton Square, Kipling Street, London
- Flat 3, 62 Weston Street, London
- Flat 3, 62 Weston Street, London
- 70 Crosby Row, London, Southwark
- 70 Crosby Row, London, Southwark
- Second Floor, 18-20 Crucifix Lane, London
- Second Floor, 18-20 Crucifix Lane, London
- Part Fourth Floor, 136-148 Tooley Street, London
- Part Fourth Floor, 136-148 Tooley Street, London
- Basement And Ground Floor, 104 Tooley Street, London
- Basement And Ground Floor, 104 Tooley Street, London
- Ground Floor, 60 Weston Street, London
- Ground Floor, 60 Weston Street, London
- First Floor West, 136-148 Tooley Street, London
- First Floor West, 136-148 Tooley Street, London
- Unit 272, London Bridge Station, London Bridge Street
- Unit 272, London Bridge Station, London Bridge Street
- Flat 2, 83 Weston Street, London
- Flat 2, 83 Weston Street, London
- Flat 2, 80 Bermondsey Street, London
- Flat 2, 80 Bermondsey Street, London
- The York Clinic, 47 Weston Street, London
- The York Clinic, 47 Weston Street, London
- Room 5, Lowri Building, 112-114 Tooley Street
- Room 5, Lowri Building, 112-114 Tooley Street
- 16 Hardwide Street, London, Southwark
- 16 Hardwide Street, London, Southwark
- Flat 9, 79 Bermondsey Street, London
- Flat 9, 79 Bermondsey Street, London

- 28 Oxford Drive, London, Southwark
- 28 Oxford Drive, London, Southwark
- 143 Guinness Court, Snowsfields, London
- 143 Guinness Court, Snowsfields, London
- 51 Tyers Estate, Bermondsey Street, London
- 51 Tyers Estate, Bermondsey Street, London
- 34 Hamilton Square, Kipling Street, London
- 34 Hamilton Square, Kipling Street, London
- 91 Guinness Court, Snowsfields, London
- 91 Guinness Court, Snowsfields, London
- Unit 6, Shard Arcade, Joiner Street
- Unit 6, Shard Arcade, Joiner Street
- 35 Bridgewalk Heights, 80 Weston Street, London
- 35 Bridgewalk Heights, 80 Weston Street, London
- 23A Bridgewalk Heights, 80 Weston Street, London
- 23A Bridgewalk Heights, 80 Weston Street, London
- 17 Bridgewalk Heights, 80 Weston Street, London
- 17 Bridgewalk Heights, 80 Weston Street, London
- 9 Fenning Street, London, Southwark
- 9 Fenning Street, London, Southwark
- 80 Crosby Row, London, Southwark
- 80 Crosby Row, London, Southwark
- 74 Crosby Row, London, Southwark
- 74 Crosby Row, London, Southwark
- 58 Crosby Row, London, Southwark
- 58 Crosby Row, London, Southwark
- Unit 2, Shard Arcade, Joiner Street
- Unit 2, Shard Arcade, Joiner Street
- Flat 8, Sarah Swift House, Kipling Street
- Flat 8, Sarah Swift House, Kipling Street
- Flat 13, Lion Court, 12 Shand Street
- Flat 13, Lion Court, 12 Shand Street
- 3 Bridgewalk Heights, 80 Weston Street, London
- 3 Bridgewalk Heights, 80 Weston Street, London
- 38 Crosby Row, London, Southwark
- 38 Crosby Row, London, Southwark
- Flat 11, St Lukes Court, 124-126 Tooley Street
- Flat 11, St Lukes Court, 124-126 Tooley Street
- Level 28, The Shard, 32 London Bridge Street
- Level 28, The Shard, 32 London Bridge Street
- Level 20, The Shard, 32 London Bridge Street
- Level 20, The Shard, 32 London Bridge Street
- Level 14, The Shard, 32 London Bridge Street
- Level 14, The Shard, 32 London Bridge Street
- Restaurant Level 32, The Shard, 32 London Bridge Street
- Restaurant Level 32, The Shard, 32 London Bridge Street

- Sainsbury Outpatient Pharmacy Solomon Centre, Guys Hospital, St Thomas Street
- Sainsbury Outpatient Pharmacy Solomon Centre, Guys Hospital, St Thomas Street
- Living Accommodation, The Britannia, 44 Kipling Street
- Living Accommodation, The Britannia, 44 Kipling Street
- Living Accommodation, Horseshoe, 26 Melior Street
- Living Accommodation, Horseshoe, 26 Melior Street
- Ground Floor, 122 Tooley Street, London
- Ground Floor, 122 Tooley Street, London
- Flat 3, More Copper House, 14-16 Magdalen Street
- Flat 3, More Copper House, 14-16 Magdalen Street
- Room 206 West Wing Nurses Home, Guys Hospital, Great Maze Pond
- Room 206 West Wing Nurses Home, Guys Hospital, Great Maze Pond
- Flat 2, Globe House, 2A Crucifix Lane
- Flat 2, Globe House, 2A Crucifix Lane
- Flat B, 17A Magdalen Street, London
- Flat B, 17A Magdalen Street, London
- Medical School, Borough Wing And Tabard Wing Guys Hospital, Great Maze Pond
- Medical School, Borough Wing And Tabard Wing Guys Hospital, Great Maze Pond
- Manasa, The Tanneries, 55 Bermondsey Street
- Manasa, The Tanneries, 55 Bermondsey Street
- First Floor, 16 Crucifix Lane, London
- First Floor, 16 Crucifix Lane, London
- Hodgkin Building, Guys Hospital, St Thomas Street
- Hodgkin Building, Guys Hospital, St Thomas Street
- Block K 106, Guinness Buildings, Snowsfields
- Block K 106, Guinness Buildings, Snowsfields
- Basement, 77 Weston Street, London
- Basement, 77 Weston Street, London
- Basement, 60 Weston Street, London
- Basement, 60 Weston Street, London
- 7 Crucifix Lane, London, Southwark
- 7 Crucifix Lane, London, Southwark
- Third Floor, 8 Holyrood Street, London
- Third Floor, 8 Holyrood Street, London
- Flat 2, 98 Tooley Street, London
- Flat 2, 98 Tooley Street, London
- 46 Oxford Drive, London, Southwark
- 46 Oxford Drive, London, Southwark
- 6 Oxford Drive, London, Southwark
- 6 Oxford Drive, London, Southwark

- Flat 2, Lion Court, 28 Magdalen Street
- Flat 2, Lion Court, 28 Magdalen Street
- 1 Magdalen Street, London, Southwark
- 1 Magdalen Street, London, Southwark
- 6 Crucifix Lane, London, Southwark
- 6 Crucifix Lane, London, Southwark
- 135 Guinness Court, Snowsfields, London
- 135 Guinness Court, Snowsfields, London
- 122 Guinness Court, Snowsfields, London
- 122 Guinness Court, Snowsfields, London
- 73 Guinness Court, Snowsfields, London
- 73 Guinness Court, Snowsfields, London
- 72 Guinness Court, Snowsfields, London
- 72 Guinness Court, Snowsfields, London
- Second Floor, 90A Tooley Street, London
- Second Floor, 90A Tooley Street, London
- 66 Guinness Court, Snowsfields, London
- 66 Guinness Court, Snowsfields, London
- 61 Guinness Court, Snowsfields, London
- 61 Guinness Court, Snowsfields, London
- 100 Guinness Court, Snowsfields, London
- 100 Guinness Court, Snowsfields, London
- 7 Guinness Court, Snowsfields, London
- 7 Guinness Court, Snowsfields, London
- 16 Bridgewalk Heights, 80 Weston Street, London
- 16 Bridgewalk Heights, 80 Weston Street, London
- 2 Bridgewalk Heights, 80 Weston Street, London
- 2 Bridgewalk Heights, 80 Weston Street, London
- Flat 1, 11 Porlock Street, London
- Flat 1, 11 Porlock Street, London
- Flat 1, 40 Snowsfields, London
- Flat 1, 40 Snowsfields, London
- Flat 18, 70 Weston Street, London
- Flat 18, 70 Weston Street, London
- 43 Snowsfields, London, Southwark
- 43 Snowsfields, London, Southwark
- 14 Crucifix Lane, London, Southwark
- 14 Crucifix Lane, London, Southwark
- 25 Hamilton Square, Kipling Street, London
- 25 Hamilton Square, Kipling Street, London
- 24 Hamilton Square, Kipling Street, London
- 24 Hamilton Square, Kipling Street, London
- 74 Bermondsey Street, London, Southwark
- 74 Bermondsey Street, London, Southwark
- Flat 2, 79 Bermondsey Street, London
- Flat 2, 79 Bermondsey Street, London

- 60B Bermondsey Street, London, Southwark
- 60B Bermondsey Street, London, Southwark
- Flat 4, 64 Weston Street, London
- Flat 4, 64 Weston Street, London
- 10 Tyers Estate, Bermondsey Street, London
- 10 Tyers Estate, Bermondsey Street, London
- 70 Tyers Estate, Bermondsey Street, London
- 70 Tyers Estate, Bermondsey Street, London
- 69 Tyers Estate, Bermondsey Street, London
- 69 Tyers Estate, Bermondsey Street, London
- 36 Tyers Estate, Bermondsey Street, London
- 36 Tyers Estate, Bermondsey Street, London
- Flat 1, 4B Tyers Gate, London
- Flat 1, 4B Tyers Gate, London
- Flat 1, 4B Tyers Gate, London
- Flat 1, 4B Tyers Gate, London
- 2 Crucifix Lane, London, Southwark
- 2 Crucifix Lane, London, Southwark
- 1 Porlock Street, London, Southwark
- 1 Porlock Street, London, Southwark
- 2 Guy Street, London, Southwark
- 2 Guy Street, London, Southwark
- 86 Crosby Row, London, Southwark
- 86 Crosby Row, London, Southwark
- 18 Crosby Row, London, Southwark
- 18 Crosby Row, London, Southwark
- London Bridge Station, 56 Tooley Street, London
- London Bridge Station, 56 Tooley Street, London
- Unit 182, London Bridge Station, London Bridge Street
- Unit 182, London Bridge Station, London Bridge Street
- Unit 147, London Bridge Station, London Bridge Street
- Unit 147, London Bridge Station, London Bridge Street
- Unit 119, London Bridge Station, London Bridge Street
- Unit 119, London Bridge Station, London Bridge Street
- Unit 107, London Bridge Station, London Bridge Street
- Unit 107, London Bridge Station, London Bridge Street
- London Farmers Market, Guys Hospital, St Thomas Street
- London Farmers Market, Guys Hospital, St Thomas Street
- 87 Weston Street, London, Southwark
- 87 Weston Street, London, Southwark
- Unit 310, Shard Arcade, Joiner Street
- Unit 310, Shard Arcade, Joiner Street
- Unit 7, Shard Arcade, Joiner Street
- Unit 7, Shard Arcade, Joiner Street
- Ground Floor, 58 Bermondsey Street, London
- Ground Floor, 58 Bermondsey Street, London

15.06.2020

- Part, 7-13 Melior Street, London
- Part, 7-13 Melior Street, London
- Amt Coffee Ltd, Guys Hospital Cancer Centre, Great Maze Pond
- Amt Coffee Ltd, Guys Hospital Cancer Centre, Great Maze Pond
- Apartment 7, 8 Melior Street, London
- Apartment 7, 8 Melior Street, London
- Apartment 4, 8 Melior Street, London
- Apartment 4, 8 Melior Street, London
- Apartment 30, 36 Snowsfields, London
- Apartment 30, 36 Snowsfields, London
- Apartment 18, 36 Snowsfields, London
- Apartment 18, 36 Snowsfields, London
- Apartment 16, 36 Snowsfields, London
- Apartment 16, 36 Snowsfields, London
- Apartment 15, 36 Snowsfields, London
- Apartment 15, 36 Snowsfields, London
- Unit 1, 36 Snowsfields, London
- Unit 1, 36 Snowsfields, London
- Level 14B, The Shard, 32 London Bridge Street
- Level 14B, The Shard, 32 London Bridge Street
- Part First Floor, 75 Weston Street, London
- Part First Floor, 75 Weston Street, London
- The Skyroom, 136-148 Tooley Street, London
- The Skyroom, 136-148 Tooley Street, London
- Flat 9B, 79 Bermondsey Street, London
- Flat 9B, 79 Bermondsey Street, London
- Third Floor Front, 134 Tooley Street, London
- Third Floor Front, 134 Tooley Street, London
- 73C Maltings Place, London, Southwark
- 73C Maltings Place, London, Southwark
- Railway Arches 895 And 896, Holyrood Street, London
- Railway Arches 895 And 896, Holyrood Street, London
- Flat 4B, 16 Crucifix Lane, London
- Flat 4B, 16 Crucifix Lane, London
- Flat 3, 1 Shand Street, London
- Flat 3, 1 Shand Street, London
- First Floor, Bramah House, 65-71 Bermondsey Street
- First Floor, Bramah House, 65-71 Bermondsey Street
- Medical School, Tower Wing Guys Hospital, Great Maze Pond
- Medical School, Tower Wing Guys Hospital, Great Maze Pond
- Unit 31, 54 Bermondsey Street, London
- Unit 31, 54 Bermondsey Street, London

- Unit 12, 52 Bermondsey Street, London
- Unit 12, 52 Bermondsey Street, London
- Munro Clinic, Snowsfields, London
- Munro Clinic, Snowsfields, London
- Fourth Floor, Bramah House, 65-71 Bermondsey Street
- Fourth Floor, Bramah House, 65-71 Bermondsey Street
- Ground Floor Room 1, 77 Weston Street, London
- Ground Floor Room 1, 77 Weston Street, London
- Flat 20, Kamen House, 17-21 Magdalen Street
- Flat 20, Kamen House, 17-21 Magdalen Street
- Flat 16, Kamen House, 17-21 Magdalen Street
- Flat 16, Kamen House, 17-21 Magdalen Street
- Flat 7, Kamen House, 17-21 Magdalen Street
- Flat 7, Kamen House, 17-21 Magdalen Street
- Kamen House, 24 Magdalen Street, London
- Kamen House, 24 Magdalen Street, London
- 2 Carmarthen Place, London, Southwark
- 2 Carmarthen Place, London, Southwark
- 9 Raquel Court, 147 Snowsfields, London
- 9 Raquel Court, 147 Snowsfields, London
- 68 Burwash House, Weston Street, London
- 68 Burwash House, Weston Street, London
- 6 Crucifix Lane, London, SE1 3JW
- 6 Crucifix Lane, London, SE1 3JW
- 12 Pope Street, London, SE1 3PR
- 12 Pope Street, London, SE1 3PR
- 59 Pages Walk, London, London
- 59 Pages Walk, London, London
- flat 1, 83 weston street, london
- flat 1, 83 weston street, london
- Flat 18, 36 Snowsfields, London
- Flat 18, 36 Snowsfields, London
- 85 Weston Street, Flat 3, London
- 85 Weston Street, Flat 3, London
- 69 Burwash House, Weston st, London, SE1 3rp
- 69 Burwash House, Weston st, London, SE1 3rp
- 22 leathermarket street, london, se1 3hp
- 22 leathermarket street, london, se1 3hp
- Apartment 29, 36 Snowsfields, London
- Apartment 29, 36 Snowsfields, London
- Essentia, 2nd Floor, 200 Great Dover Street
- Essentia, 2nd Floor, 200 Great Dover Street
- Flat 5 1 Leathermarket St, London, SE1 3HN
- Flat 5 1 Leathermarket St, London, SE1 3HN
- 1001 Antonine Heights, London, se13df
- 1001 Antonine Heights, London, se13df

- Flat 8, 36 Snowsfields, London
- Flat 8, 36 Snowsfields, London
- 36 Snowsfields, Flat 23, London
- 36 Snowsfields, Flat 23, London
- Flat 24, 36 snowsfields, London
- Flat 24, 36 snowsfields, London
- 93 Prospect House, London, SE16 4AF
- 93 Prospect House, London, SE16 4AF
- Flat 2, 4b Tyers Gate, London, SE1 3HX
- Flat 2, 4b Tyers Gate, London, SE1 3HX
- 10 crucifix lane, london, se1 3jw
- 10 crucifix lane, london, se1 3jw
- Flat 2, 85 Weston St., London, SE1 3RS
- Flat 2, 85 Weston St., London, SE1 3RS
- 196 Tower Bridge Road, London, SE1 2UN
- 196 Tower Bridge Road, London, SE1 2UN
- 108 Elim Estate, Weston Street, London
- 108 Elim Estate, Weston Street, London
- 59 Stephenson House, Bath Terrace, LONDON
- 59 Stephenson House, Bath Terrace, LONDON
- Flat 1, 3 Market Yard Mews, London, SE1 3TJ
- Flat 1, 3 Market Yard Mews, London, SE1 3TJ
- Flat 30 Becket House, Tabard Street, London
- Flat 30 Becket House, Tabard Street, London
- 25 Trocette Mansions, 249 Bermondsey St, London
- 25 Trocette Mansions, 249 Bermondsey St, London
- 35 Tyers estate, Bermondsey Street, London
- 35 Tyers estate, Bermondsey Street, London
- Apt 247, Empire Square West, London
- Apt 247, Empire Square West, London
- 11 Aylwin Estate, London, SE1 3DU
- 11 Aylwin Estate, London, SE1 3DU
- Flat 4, The Morocco Store, 1 Leathermarket Street, London
- Flat 4, The Morocco Store, 1 Leathermarket Street, London
- 14 Bermondsey Exchange, 179 - 181 Bermondsey Street,
London
- 14 Bermondsey Exchange, 179 - 181 Bermondsey Street,
London
- 37B Maltings Place, London, SE13JB
- 37B Maltings Place, London, SE13JB
- 14 Jamaica Road, Bermondsey, SE1 2RN
- 14 Jamaica Road, Bermondsey, SE1 2RN
- 64 Prospect House, London, SE16 4AF
- 64 Prospect House, London, SE16 4AF
- 37B Maltings Place, Tower Bridge Road, London
- 37B Maltings Place, Tower Bridge Road, London

21.03.2021

- Apt 1, 85 Weston Street, London
- Apt 1, 85 Weston Street, London
- Flat 12, 11 Bellyard mews, London
- Flat 12, 11 Bellyard mews, London
- 12 Bermondsey Sq, Flat 67, London
- 12 Bermondsey Sq, Flat 67, London
- 21 Guinness Court, Snowsfields, London
- 21 Guinness Court, Snowsfields, London
- Flat 11, 22 Leathermarket Street, London, SE1 9HP
- Flat 11, 22 Leathermarket Street, London, SE1 9HP
- 217 long lane, Dundee court, London, SE1 4PA
- 217 long lane, Dundee court, London, SE1 4PA
- St Saviours Estate, Bermondsey, SE1 3eg
- St Saviours Estate, Bermondsey, SE1 3eg
- 83 Weston Street, London, SE1 3RS
- 83 Weston Street, London, SE1 3RS
- APARTMENT 27, 36 SNOWSFIELDS, SNOWSFIELDS YARD, London
- APARTMENT 27, 36 SNOWSFIELDS, SNOWSFIELDS YARD, London
- Flat 14 Chilham House, 28 Law Street, 28 Law Street
- Flat 14 Chilham House, 28 Law Street, 28 Law Street
- 11 Bell Yard Mews, London, SE1 3TN
- 11 Bell Yard Mews, London, SE1 3TN
- 26 Hunter House, King James street, London
- 26 Hunter House, King James street, London
- Flat 14 Chilham House, 28 Law Street, London
- Flat 14 Chilham House, 28 Law Street, London
- Apartment 5, 83 Weston St, London, London
- Apartment 5, 83 Weston St, London, London
- 7 Tyers Est., London, SE1 3JQ
- 7 Tyers Est., London, SE1 3JQ
- Apt21, 36, Snowsfields, London
- Apt21, 36, Snowsfields, London
- apt 10, 36 Snowsfields, London
- apt 10, 36 Snowsfields, London
- 64 Prospect House, Sun Passage, London
- 64 Prospect House, Sun Passage, London
 - Flat 23, 36 snowsfields, London
- Flat 23, 36 snowsfields, London

13.03.2021

Re-consultation Letters to Neighbours and Local Groups:

Recipient Address:

Date Letter Sent:

- Flat 1, 4B Tyers Gate, London
- 68 Burwash House, Weston Street, London
- 6 Crucifix Lane, London, SE1 3JW

- 12 Pope Street, London, SE1 3PR
- 59 Pages Walk, London, London
- flat 1, 83 weston street, london
- Flat 18, 36 Snowsfields, London
- 85 Weston Street, Flat 3, London
- 69 Burwash House, Weston st, London, SE1 3rp
- 22 leathermarket street, london, se1 3hp
- Apartment 29, 36 Snowsfields, London
- Essentia, 2nd Floor, 200 Great Dover Street
- Flat 5 1 Leathermarket St, London, SE1 3HN
- 1001 Antonine Heights, London, se13df
- Flat 8, 36 Snowsfields, London
- 36 Snowsfields, Flat 23, London
- Flat 24, 36 snowsfields, London
- 93 Prospect House, London, SE16 4AF
- Flat 2, 4b Tyers Gate, London, SE1 3HX
- 10 crucifix lane, london, se1 3jw
- Flat 2, 85 Weston St., London, SE1 3RS
- 196 Tower Bridge Road, London, SE1 2UN
- 108 Elim Estate, Weston Street, London
- 59 Stephenson House, Bath Terrace, LONDON
- Flat 1, 3 Market Yard Mews, London, SE1 3TJ
- Flat 30 Becket House, Tabard Street, London
- 25 Trocette Mansions, 249 Bermondsey St, London
- 35 Tyers estate, Bermondsey Street, London
- Apt 247, Empire Square West, London
- 11 Aylwin Estate, London, SE1 3DU
- Flat 4, The Morocco Store, 1 Leathermarket Street, London
- 14 Bermondsey Exchange, 179 - 181 Bermondsey Street,
London
- 37B Maltings Place, London, SE13JB
- 14 Jamaica Road, Bermondsey, SE1 2RN
- 64 Prospect House, London, SE16 4AF
- 37B Maltings Place, Tower Bridge Road, London
- Apt 1, 85 Weston Street, London
- Flat 12, 11 Bellyard mews, London
- 12 Bermondsey Sq, Flat 67, London
- 21 Guinness Court, Snowsfields, London
- Flat 11, 22 Leathermarket Street, London, SE1 9HP
- 217 long lane, Dundee court, London, SE1 4PA
- St Saviours Estate, Bermondsey, SE1 3eg
- 83 Weston Street, London, SE1 3RS
- APARTMENT 27, 36 SNOWSFIELDS, SNOWSFIELDS
YARD, London
- Flat 14 Chilham House, 28 Law Street, 28 Law Street
- 11 Bell Yard Mews, London, SE1 3TN

21.03.2021

- 26 Hunter House, King James street, London
- Flat 14 Chilham House, 28 Law Street, London
- Apartment 5, 83 Weston St, London, London
- 7 Tyers Est., London, SE1 3JQ
- Apt21, 36, Snowsfields, London
- apt 10, 36 Snowsfields, London
- 64 Prospect House, Sun Passage, London
- Flat 23, 36 snowsfields, London

13.03.2021

Consultation Letters to Internal Consultees:

No consultation was carried out

Re-consultation Letters to Internal Consultees:

Name of Internal Consultee:	Reply Received?	Reply Received?
• Archaeology	11.03.2021	YES
• Design and Conservation	11.03.2021	YES
Team [Formal]		
• Local Economy	11.03.2021	No
• Ecology	11.03.2021	YES
• Environmental Protection	11.03.2021	No
• Highways Development	11.03.2021	YES
and Management		
• Highways Licensing	11.03.2021	No
• Flood Risk Management &	11.03.2021	No
Urban Drainage		
• Transport Policy	11.03.2021	No
• Urban Forester	11.03.2021	YES
• Waste Management	11.03.2021	No

Consultation Letters to External Consultees:

No consultation was carried

Re-consultation Letters to External Consultees:

Name of External Consultee:	Reply Received?	Reply Received?
• Environment Agency	11.03.2021	YES
• Great London Authority	11.03.2021	No
• Historic England	11.03.2021	No
• London Fire & Emergency	11.03.2021	No
Planning Authori		
• London Underground	11.03.2021	No
• Natural England - London &	11.03.2021	No
South East Re		
• Network Rail	11.03.2021	No
• Metropolitan Police Service	11.03.2021	YES
(Designing O		
• Transport for London	11.03.2021	No

• Thames Water	11.03.2021	YES
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Site Visit	
Case officer site visit date:	The case officer did not carry out a site visit.

RECOMMENDATION

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

Applicant	Edge Technologies UK 1 Ltd & Zurich Assurance Ltd	Reg. Number	20/AP/0944
Application Type	Full Planning Application		
Recommendation	Grant subject to Legal Agreement	Case Number	151-60

Draft of Decision Notice

Planning Permission was GRANTED for the following development:

Redevelopment of the site to include demolition of Becket House and the erection of a 27 storey building with additional level of plant and basement levels in order to provide office use (Class B1), retail (flexible Class A1/A3), cycle parking, servicing, refuse and plant areas, public realm improvements and other associated works incidental to the development.

The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Application can be viewed by appointment at Southwark Council's offices, 160 Tooley Street, SE1 2QH (Mon - to Fri 9am to 5pm). Non-Technical Summary available free of charge, Copies of the full ES are available for purchase from Trium Environmental Consulting (email: hello@triumenv.co.uk or call 02038877118).

At: Becket House, 60-68 St Thomas Street, London, SE1 3QU

Permission is subject to the following Approved Plans Condition:

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

Reference no. / Plan/document name / Revision:

Received on:

Proposed Plans

1842-PP-96-DR-A-10-0096 REV P1

1842-PP-97-DR-A-10-0097 REV P1

1842-PP-98-DR-A-10-0098 REV P1

1842-PP-99-DR-A-10-0099 REV P1

1842-PP-00-DR-A-10-0100 REV P1

1842-PP-01-DR-A-10-0101 REV P1

1842-PP-02-DR-A-10-0102 REV P1

1842-PP-03-DR-A-10-0103 REV P1

1842-PP-04-DR-A-10-0104 REV P1

1842-PP-05-DR-A-10-0105 REV P1

1842-PP-23-DR-A-10-0123 REV P1

1842-PP-24-DR-A-10-0124 REV P1

1842-PP-25-DR-A-10-0125 REV P1

1842-PP-26-DR-A-10-0126 REV P1

1842-PP-27-DR-A-10-0127 REV P1

1842-PP-28-DR-A-10-0128 REV P1

Proposed Elevations

1842-PP-XX-DR-A-03-0210 REV P1

1842-PP-XX-DR-A-03-0220 REV P1

1842-PP-XX-DR-A-03-0230 REV P1

1842-PP-XX-DR-A-03-0240 REV P1

1842-PP-XX-DR-A-11-0001

1842-PP-XX-DR-A-11-0002

1842-PP-XX-DR-A-11-0003

1842-PP-XX-DR-A-11-0004

1842-PP-XX-DR-A-11-9901

1842-PP-XX-DR-A-11-2702

1842-PP-XX-DR-A-11-2703

Proposed Sections

1842-PP-XX-DR-A-03-0310 REV P1

1842-PP-XX-DR-A-03-0320 REV P1

1842-PP-XX-DR-A-03-0330 REV P1

1842-PP-XX-DR-A-03-0340 REV P1

Facade Details

1842-PP-XX-DR-A-21-0050 REV P1

1842-PP-XX-DR-A-21-0051 REV P1

1842-PP-XX-DR-A-21-0052 REV P1

1842-PP-XX-DR-A-21-0053 REV P1

1842-PP-XX-DR-A-21-0054 REV P1

1842-PP-XX-DR-A-21-0055 REV P1

1842-PP-XX-DR-A-21-0056 REV P1

1842-PP-XX-DR-A-21-0057 REV P1

Landscaping

1842-PP-XX-DR-A-11-9901

548-CTF-00-XX-DR-L-5100 P05

548-CTF-00-00-DR-L-1001 P04

548-CTF-00-00-DR-L-2001 P03

548-CTF-00-00-DR-L-2002 P03

548-CTF-00-00-DR-L-5001 P04

548-CTF-00-00-DR-L-5002 P04

548-CTF-00-28-DR-L-5004 P04

548-CTF-00-XX-DR-L-5003 P03

Reason:

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

1. **Time limit condition**

Time Limit

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

Reason:

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

2. **Pre-commencement condition**

Drainage

Prior to the commencement of development a drainage strategy detailing any on and or off site drainage works shall be submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. No discharge of foul or surface water from the site shall be accepted into the public systems until drainage works referred to in the strategy have been completed and the development shall not be carried out otherwise than in accordance with any such approval given.

Reason

The development may lead to sewage flooding and to ensure that sufficient capacity is made available to cope with the new development and in order to avoid adverse environmental impact upon the community in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policies 3.1 Environmental Effects and 3.9 Water of the Southwark Plan 2007.

3. **Pre-commencement condition**

Site Contamination

a) Prior to the commencement of any development, a site investigation and risk assessment shall be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site.

i) The Phase 1 (desk study, site categorisation; sampling strategy etc.) shall be submitted to the Local Planning Authority for approval before the commencement of any intrusive investigations.

ii) Any subsequent Phase 2 (site investigation and risk assessment) shall be conducted in accordance with any approved scheme and submitted to the Local Planning Authority for approval prior to the commencement of any remediation that might be required.

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

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

d) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-c above.

Reason

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

4. **Pre-commencement condition**

Environment Agency - Contamination

Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the Local Planning Authority:

- i. A site investigation scheme, based on the 'Phase 1 Contamination Assessment Report' by RMA (reference RMA-RC2005 Issue 01 dated September 2019) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
- ii. The results of the site investigation and detailed risk assessment referred to in (i) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
- iii. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (ii) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express consent of the Local Planning Authority. The scheme shall be implemented as approved.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with the National Planning Policy Framework (NPPF) (Paragraph 170). The site is located over a Secondary Aquifer and it is understood that the site may be affected by historic contamination.

Environment Agency - Further contamination

- 5. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

Reason: There is always the potential for unexpected contamination to be identified during development groundworks. We should be consulted should any contamination be identified that could present an unacceptable risk to Controlled Waters.

6. **Pre-commencement condition**

Archaeological Foundation and Basement Design

Before any work, hereby authorised, excluding demolition to basement level, archaeological evaluation and site investigation works, begins, the applicant shall submit a detailed scheme showing the complete scope and arrangement of the basement and foundation design, and all associated subterranean groundworks, including the construction methods. The

submitted documents should show how archaeological remains will be protected by a suitable mitigation strategy. The detailed scheme will need to be approved in writing by the Local Planning Authority and the development shall only be carried out in accordance with the approval given.

Reason: In order that 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 Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2019.

7. Pre-commencement condition

Archaeological Evaluation

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

Reason: In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2019.

8. Pre-commencement condition

Archaeological Mitigation

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

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

9. Pre-Occupation condition

Thames Water - Infrastructure

There shall be no occupation until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason - The development may lower water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues.

10. Pre-commencement condition

Thames Water - Piling (Sewage)

No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.

11. Pre-commencement condition

Thames Water - Piling (Water)

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure.

12. **Pre-commencement condition**

Landscaping

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

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

Reason:

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

13. **Pre-commencement condition**

Tree Planting

Prior to works commencing, full details of all proposed tree planting shall be submitted to and approved in writing by the Local Planning Authority.

Planting shall consist of a minimum of 3 trees on St Thomas Street, 5 on Fenning St and 25 elsewhere at ground level. Details will include tree pit cross sections, planting and maintenance specifications and confirmation of location, species, sizes, nursery stock type, supplier and defect period. All tree planting shall be carried out in accordance with those details and at those times. Planting shall comply with BS5837: Trees in relation to demolition, design and construction (2012) and BS: 4428 Code of practice for general landscaping operations.

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

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

14. Pre-commencement condition

Vehicle Dynamics Assessment

Prior to the commencement of development (with the exception of demolition works and site clearance), a Vehicle Dynamics Assessment shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Metropolitan Police. The development shall then be implemented in accordance with any approval given.

Reason

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

15. Pre-commencement condition

Blast Mitigation Impact Assessment

Prior to the commencement of development (with the exception of demolition works and site clearance), a Blast Mitigation Impact Assessment shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Metropolitan Police. The development shall then be implemented in accordance with any approval given.

Reason

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

16. **Pre-commencement condition**

Hostile Vehicle Mitigation

Prior to the commencement of development (with the exception of demolition works and site clearance), details of all proposed Hostile Vehicle Mitigation shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Metropolitan Police. The development shall then be implemented in accordance with any approval given.

Reason

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

17. **Above grade condition**

Bird boxes

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

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

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

Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest/roost features are installed in full in

accordance to the agreed plans. A post completion assessment will be required to confirm the nest/roost features have been installed to the agreed specification.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with The London Plan 2021, Policy 3.28 of the Southwark Plan and Strategic Policy 11 of the Southwark Core strategy.

18. Above grade condition

Ecological Management Plan

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

Reason:

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

19. Above grade condition

Green roofs for biodiversity

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

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

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

The biodiversity roof(s) shall be carried out strictly in accordance with the

details so approved and shall be maintained as such thereafter.

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

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the London Plan 2021; Strategic Policy 11 (Design and Conservation) of the Core Strategy 2011, and; Saved Policy 3.28 (Biodiversity) of the Southwark Plan 2007.

20. **Above grade condition**

Landscaping

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

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

Reason:

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

21. **Above grade condition**

Materials

Prior to above grade works commencing, material samples/sample-panels/sample-boards of all external facing materials to be used in the carrying out of this permission shall be presented on site and approved in writing by the Local Planning Authority; the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

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

22. **Above grade condition**

Detailed drawings

1:5/10 section detail-drawings through all buildings facades; parapets; heads, cills and jambs of all openings; entrance lobbies; shop frontages; roof edges; details of typical window openings, entrances (inc servicing) and shopfronts.

To be used in the carrying out of this permission shall be submitted to and approved in writing by the Local Planning Authority before any work above grade in connection with this permission is carried out. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

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

23. **Above grade condition**

Design mock ups

Full-scale mock-ups of the facades to be used in the carrying out of this permission shall be presented on site and approved in writing by the Local Planning Authority before any work above grade for the relevant building in connection with this permission is carried out; the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

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

24. Above grade condition

Secure by design

Before any above grade work hereby authorised begins, details of secure by design measures shall be submitted and approved in writing by the Local Planning Authority. Any such security measures shall be implemented prior to occupation in accordance with the approved details which shall seek to achieve the 'Secured by Design' accreditation award from the Metropolitan Police.

Reason:

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

25. Above grade condition

Cycle storage

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

Reason:

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

26. Above grade condition

BREEAM

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

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

Reason

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

27. **Compliance condition**

Environment Agency - Piling

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to Controlled Waters.

28. **Compliance condition**

Environment Agency - SUDS

Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with the National Planning Policy Framework (NPPF) (Paragraph 170). Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

29. **Compliance condition**

Thames Water - Construction

No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.

Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure.

30. **Compliance condition**

No roof plant

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

Reason

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual

amenity of the area in accordance with The National Planning Policy Framework 2019, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.13 Urban Design of the Southwark Plan 2007.

31. Compliance condition

Plant Noise - standard

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. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. 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

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 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

32. Compliance condition

Electric vehicle charging

The accessible parking bay shall be provided with electric car charging facilities.

Reason:

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

33. Compliance condition

Office terrace use

Other than for maintenance purposes, repair purposes or means of escape, the office terraces shall not be used outside of the following hours:
08:00 - 22:00 on Mondays to Fridays

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 2019; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007.

34. Compliance condition

CPZ exclusion

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

Reason:

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

35. Compliance condition

Noise

The machinery, plant or equipment installed or operated in connection with the carrying out of this permission shall be so enclosed and/or attenuated that noise there from does not, at any time, increase the ambient equivalent noise level when the plant, etc., is in use as measured at any adjoining or nearby premises in separate occupation; or (in the case of any adjoining or nearby residential premises) as measured outside those premises; or (in the case of residential premises in the same building) as measured in the residential unit.

Reason

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

36. Pre-Occupation condition

Environment Agency - Verification

Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance

plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the local planning authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

Reason: Should remediation be deemed necessary, the applicant should demonstrate that any remedial measures have been undertaken as agreed and the environmental risks have been satisfactorily managed so that the site is deemed suitable for use.

37. Pre-Occupation condition

Refuse storage

Before the first occupation of the development hereby permitted begins, details of the arrangements for the storing of refuse shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the approved refuse storage facilities shall be provided and made available for use by the occupiers of the development and the facilities shall thereafter be retained and shall not be used or the space used for any other purpose.

Reason:

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

38. Pre-Occupation condition

Ventilation details

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

Reason

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

39. **Pre-Occupation condition**

Flood and Drainage - Evacuation

As the site is at residual risk from and within a breach zone of the River Thames, a stand alone Flood Warning and Emergency Evacuation Plan should be submitted to Southwark's Emergency Planning department for their approval prior to occupation of the site. The plan should state how occupants will be made aware that they can sign up to the Environment Agency Flood Warning services, and of the plan itself. The plan should provide details of how occupants should respond in the event that they receive a flood warning, or become aware of a flood. The report should be proportionate and risk based in terms of sources of flooding.

Reason: To ensure that occupants have the opportunity to plan a response to flood events which can save them valuable time should an event occur.

40. **Special condition**

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: 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 Strategic Policy 12 - Design and Conservation of The Core Strategy 2011, Saved Policy 3.19 Archaeology of the Southwark Plan 2007 and the National Planning Policy Framework 2019.

Informative notes to the applicant relating to the proposed development

Guidance for works in close proximity to Network Rail's infrastructure

The developer must ensure that their proposal, both during construction and after completion does not:

- encroach onto Network Rail land
- affect the safety, operation or integrity of the company's railway and its infrastructure
- undermine its support zone
- damage the company's infrastructure
- place additional load on cuttings
- adversely affect any railway land or structure
- over-sail or encroach upon the air-space of any Network Rail land
- cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

Network Rail strongly recommend the developer complies with the following comments and requirements to maintain the safe operation of the railway and protect Network Rail's infrastructure.

Future maintenance

The development must ensure any future maintenance can be conducted solely on the applicant's land. The applicant must ensure that any construction and subsequent maintenance can be carried out to any proposed buildings or structures without adversely affecting the safety of/or encroaching upon Network Rail's adjacent land and air-space. Therefore, any buildings should be situated at least 2 metres (3m for overhead lines and third rail) from Network Rail's boundary. Network Rail require the 2m (3m for overhead lines and third rail) stand off to allow for construction and future maintenance of a building and without requirement for access to the operational railway environment which may not necessarily be granted or if granted subject to railway site safety requirements and special provisions with all associated railway costs charged to the applicant. Any less than 2m (3m for overhead lines and third rail) and there is a strong possibility that the applicant (and any future resident) will need to utilise Network Rail land and air- space to facilitate works.

The applicant / resident would need to receive approval for such works from the Network Rail Asset Protection Engineer, the applicant / resident would need to submit the request at least 20 weeks before any works were due to commence on site and they would be liable for all costs (e.g. all possession costs, all site safety costs, all asset protection presence costs).

However, Network Rail is not required to grant permission for any third-party access to its land. No structure/building should be built hard-against Network Rail's boundary as in this case there is an even higher probability of access to Network Rail land being required to undertake any construction / maintenance works. Equally any structure/building erected hard against the boundary with Network Rail will impact adversely upon our maintenance teams' ability to maintain our boundary fencing and boundary treatments.

Drainage

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

Plant & Materials

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

Scaffolding

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

Piling

Where vibro-compaction/displacement piling plant is to be used in development, details of the use of such machinery and a method statement should be submitted for the approval of the Network Rail's Asset Protection Engineer prior to the commencement of works and the works

shall only be carried out in accordance with the approved method statement.

Fencing

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

Lighting

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

Noise and Vibration

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

Vehicle Incursion

Where a proposal calls for hard standing area/parking of vehicles area near the boundary with the operational railway, Network Rail would recommend the installation of a highways approved vehicle incursion barrier or high kerbs to prevent vehicles accidentally driving or rolling onto the railway or damaging lineside fencing.

Landscaping

Where trees/shrubs are to be planted adjacent to the railway boundary

these shrubs should be positioned at a minimum distance greater than their predicted mature height from the boundary. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary as the species will contribute to leaf fall which will have a detrimental effect on the safety and operation of the railway. We would wish to be involved in the approval of any landscaping scheme adjacent to the railway. Where landscaping is proposed as part of an application adjacent to the railway it will be necessary for details of the landscaping to be known and approved to ensure it does not impact upon the railway infrastructure. Any hedge planted adjacent to Network Rail's boundary fencing for screening purposes should be so placed that when fully grown it does not damage the fencing or provide a means of scaling it. No hedge should prevent Network Rail from maintaining its boundary fencing. Lists of trees that are permitted and those that are not permitted are provided below and these should be added to any tree planting conditions:

Permitted: Birch (*Betula*), Crab Apple (*Malus Sylvestris*), Field Maple (*Acer Campestre*), Bird Cherry (*Prunus Padus*), Wild Pear (*Pyrus Communis*), Fir Trees - Pines (*Pinus*), Hawthorne (*Cretaeagus*), Mountain Ash - Whitebeams (*Sorbus*), False Acacia (*Robinia*), Willow Shrubs (Shrubby *Salix*), Thuja Plicatata "Zebrina"

Not Permitted: Alder (*Alnus Glutinosa*), Aspen - Poplar (*Populus*), Beech (*Fagus Sylvatica*), Wild Cherry (*Prunus Avium*), Hornbeam (*Carpinus Betulus*), Small-leaved Lime (*Tilia Cordata*), Oak (*Quercus*), Willows (*Salix Willow*), Sycamore - Norway Maple (*Acer*), Horse Chestnut (*Aesculus Hippocastanum*), Sweet Chestnut (*Castanea Sativa*), London Plane (*Platanus Hispanica*).

An undertaking should be given that, access for fire appliances as required by Part B5 of the current Building Regulations Approved Document B and adequate water supplies for fire fighting purposes, will be provided.

The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read TW guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our 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. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

As required by Building regulations part H paragraph 2.36, Thames Water requests that you should incorporate within the proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

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. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, 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> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

As per Building regulations part H paragraph 2.21, Drainage serving kitchens in commercial hot food premises should be fitted with a grease separator complying with BS EN 1825-2:2004 and designed in accordance with BS EN 1825-2:2002 or other effective means of grease removal. Thames Water further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Please refer to our website for further information : www.thameswater.co.uk/advice

The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our 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. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

The proposed development is located within 15m of a Thames Water Sewage Pumping Station and this is contrary to best practice set out in Sewers for Adoption (7th edition). Future occupiers of the development should be made aware that they could periodically experience adverse amenity impacts from the pumping station in the form of odour; light; vibration and/or noise

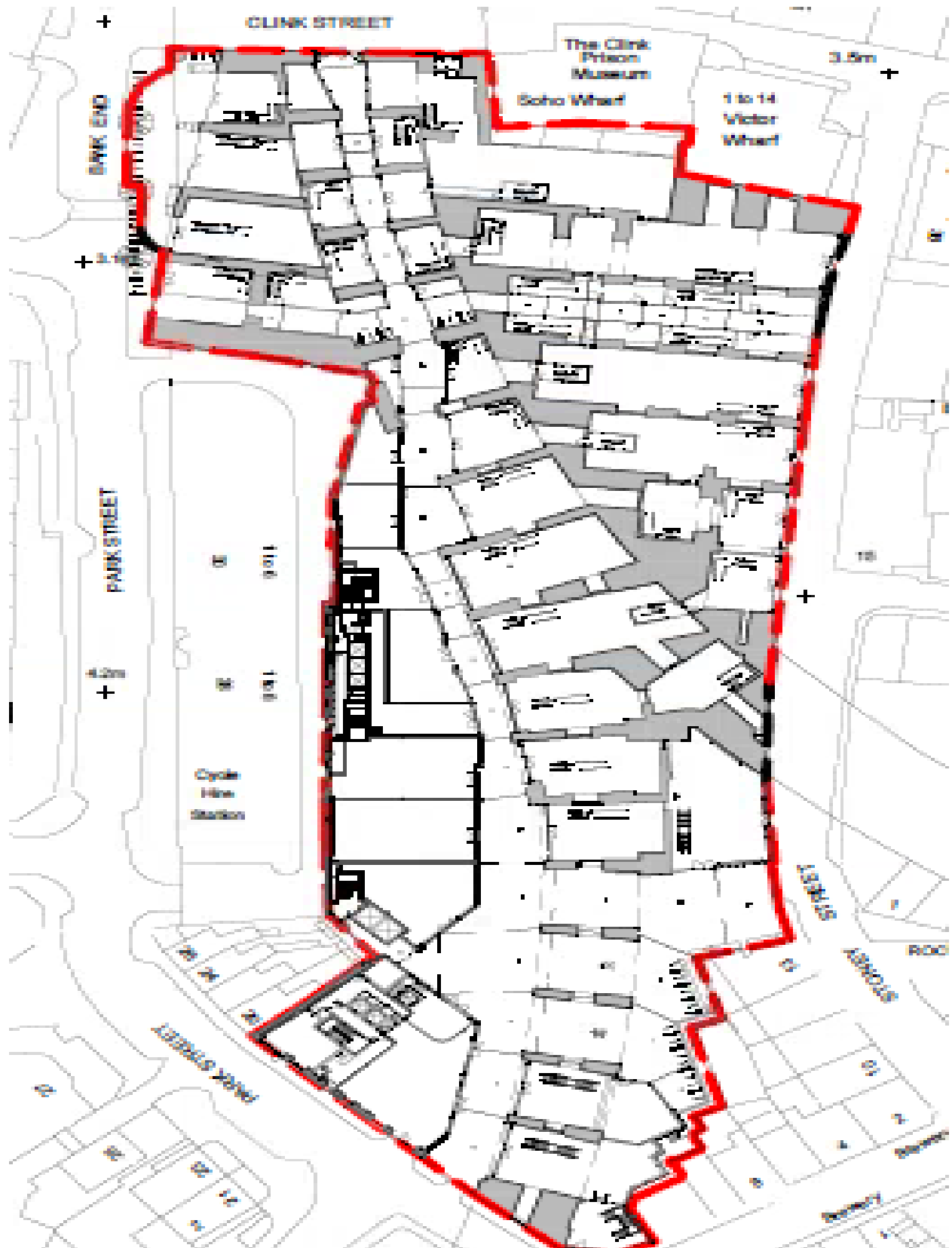
There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our 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. Email: developer.services@thameswater.co.uk

1 Bank End (Site Including Railway Arches And Thames House Bounded By Stoney Street Clink Street And Park Street) SE1.



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Item No. 7.2	Classification: OPEN	Date: 20 July 2021	Meeting Name: Planning Committee
Report title:	<p>Development Management planning application: Application 21/AP/0507 for: Full Planning Application and Application 21/AP/0326 for: Variation of Legal Agreement</p> <p>Address: 1 BANK END (SITE INCLUDING RAILWAY ARCHES AND THAMES HOUSE BOUNDED BY STONEY STREET, CLINK STREET AND PARK STREET) SE1.</p> <p>Proposal: <u>21/AP/0507</u> - 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"</p> <p>The amendments seek the following:</p> <ul style="list-style-type: none"> - 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. <p><u>21/AP/0326</u> - 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 an Small Enterprise shall not include any Supermarket owner and/or operator".</p>		
Ward(s) or	Borough & Bankside		

groups affected:	
From:	Director of Planning and Growth
Application Start Date	15.02.2021
PPA Expiry Date	n/a
Earliest Decision Date	24.06.2021

RECOMMENDATION

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.

EXECUTIVE SUMMARY

3. These applications have been called in by two ward councillors, and received approximately 100 objections in response to the first consultation.
4. The applications relate to a large site in Bankside, close to Borough Market, for a development which is currently in advanced stage of construction. The site is within the Borough and Bankside town centre and part is within the Borough High Street Conservation Area. The approved development, predominantly on the site of the former Vinopolis Wine experience, would provide new shops, restaurants, bars and offices, in existing railway arches and new buildings, and create new pedestrian streets through the site. The scheme is known as 'Borough Yards'.
5. The minor material amendment application seeks to vary condition 28 of the original planning permission to allow a larger proportion of restaurant and drinking establishment uses in the approved Class A retail units across the Borough Yards site, while adding restrictions to the maximum proportion of floor area that can be used for drinking establishments and limiting these to a maximum of one unit on Stoney Street. The applicant also seeks to change the legal agreement's definition of a "small enterprise" which relates to the independent retailer units, and would allow them to be occupied by businesses with 10 or fewer retail outlets within the UK (rather than the current restriction of no more than 3 retail outlets).
6. The minor material amendment application was amended in response to the objections received and officer advice, and further information on the mitigation measures has been provided. The deed of variation application was amended

to no longer seek changes to the obligation relating to the gallery unit.

7. The proportion of restaurants (former Class A3) and drinking establishments (former Class A4) set in a revised condition 28 (at 45% of the total floor area, with not more than 10% used for drinking establishments) is considered to represent an appropriate mix of uses for this site within the CAZ, Opportunity Area, town centre and within the site's context, while continuing to protect neighbour amenity and character of the area (including the Borough High Street Conservation Area). In this case it is considered acceptable to loosen the restriction on the definition of small enterprises to improve the likelihood that the units which have been marketed and are nearing completion will be occupied. The limit of 10 trading outlets would still achieve the original aspiration to avoid the development becoming dominated by chain high street brands.
8. Both applications are recommended for approval. The minor material amendment application would result in a revised wording of condition 28 plus a new condition to secure the gate details and would require a deed of variation for updated management documents and to update details such as the time gates are locked. The variation of legal agreement application would similarly require a deed of variation, which can be the same deed as for the first application.
9. A third application (ref. 21/AP/1393) which is an approval of details type of application made pursuant to a condition and by a different applicant seeks to combine three of the retail units on this site, will be determined separately.

BACKGROUND INFORMATION

Site location and description

10. The site has a complex and irregular shape, and straddles the railway viaducts. It includes the former Thames House on Park Street and the former Vinopolis site which is located in the railway arches. It is bound by Park Street to the west and south, Stoney Street to the east and the railway arch and Clink Street to the north. Construction is well underway for the scheme approved in 2017, with the site enclosed by hoardings and construction vehicle entrances.
11. Thames House was a five storey office building that was substantially demolished with only its front façade retained and new building under construction. It had a car park area to the rear. Vinopolis comprised a mix of uses including shops, restaurants, bars, offices, commercial space for hire and wine tour space. It also included Wine Wharf, a bar and restaurant, which fronted Stoney Street.
12. No.16 Park Street was on the eastern side of the viaduct, and was a two-storey building known as Vinopolis Plaza which had Umbrella Alley, an open space, running alongside it. It has been replaced by a new two-storey building.
13. The southern part of the site, including the Park Street frontage sits within the

Borough High Street Conservation Area, while the eastern and north eastern parts of the site are immediately adjacent to the same conservation area along Stoney Street and Clink Street. The site is within the Borough, Bermondsey and Rivers archaeological priority zone, and is to the west of the remains of Winchester Palace.

14. There are no listed buildings within the application site, but there are several listed buildings close to the site. Nos 20-26 Park Street next to the site are grade II listed, along with other grade II listed buildings on the opposite side of the roads such as: Park Street (nos 1-11, 13, 21-23 and the posts in front of 21 and 23); Stoney Street (the floral hall portico of Borough Market); Clink Street (Winchester Wharf); and Bank End (Anchor public house and five posts outside it).
15. The surrounding area contains a mix of land uses including residential, commercial, cultural spaces, restaurants, cafes and public houses and a hotel. Borough Market lies to the east and south of the site, and contains a number of restaurants, cafes, public houses as well as the large market itself.
16. To the west, nos. 28 - 30 Park Street is an eight storey building providing offices at ground to fifth floor levels and residential at sixth and seventh floors. Nos. 20 - 26 Park Street is a terrace of four houses, which are grade II listed.



Existing site layout plan, under construction



Existing building – view looking north along Stoney Street, with site's arches on the left-hand side.



Existing building – view from Bank End of the north-western part of the site.



Existing building – the south-western Park Street frontage showing the new building (with retained façade) under construction on the left and arch units on the right.

Details of proposal

17. The minor material amendment application (ref. 21/AP/0507) seeks to make changes to the wording of a condition on the implemented permission for the redevelopment of the site. The 2017 first permission (ref. 15/AP/3066) was implemented and later revised by an approved minor material amendment application ref. 19/AP/1649, therefore the relevant permission to be amended is 19/AP/1649. The current application is a section 73 minor material amendment application to vary condition 28 of the permission, and has an associated variation of s106 agreement submission (21/AP/0326) to make amendments to the section 106 legal agreement. Each application is summarised below.
18. The government’s revisions to the Use Classes came into effect in September 2020. The former Class A3 restaurants and café use is now within Class E(b), and Class A4 drinking establishments are now a sui generis use. This report will mainly refer to Class A3 and A4 uses to align with the permissions granted, the assessment of the original application, and the relevant planning policies. Reference in the report to “restaurants” means the former Class A3 use for the sale of food and drink for consumption on the premises, i.e. restaurants, snack bars and cafes. Reference in the report to “bar” or “drinking establishment” mean the former Class A4 use of public houses, wine bars or other drinking establishments (but not night clubs) including drinking establishments with expanded food provision. Finally, references to “shop” means the former Class A1 use, i.e. the display or retail sale of goods other than hot food.

Section 73 application – ref. 21/AP/0507

19. The section 73 application ref. 21/AP/0507 seeks to vary condition 28 from its current wording:

Notwithstanding the details on the drawings hereby approved, at any time, no more than 30% of the retail floorspace at ground and first floor levels shall be used for Classes A3 (restaurants and cafes) and A4 (drinking establishments of the Town and Country Planning (Use Classes) Order (as amended)).

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case and wishes to have the opportunity of exercising control over concentrations of Class A3 and A4 uses in accordance with Strategic Policy 13 - High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007 and the National Planning Policy Framework 2012.

20. The application requests this condition be revised to read as follows (although this has been revised since for the recommendation version) to allow a higher percentage of the ground and first floor Class A retail floorspace to be used for restaurants, cafes and drinking establishments in part (a), and add a cap on the drinking establishments' floor area in part (b) and a maximum of one unit on Stoney Street to be used as a drinking establishment in part (c):

Notwithstanding the details on the drawings hereby approved, at any time:

(a), no more than 45% of the retail floorspace hereby permitted at ground and first floor levels shall be used as restaurants and cafes (Class E(b)) and public houses, wine bars and drinking establishments (Sui Generis) as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended);

(b) no more than 10% of the retail floorspace hereby permitted at ground and first floor levels shall be used as public houses, wine bars and drinking establishments (Sui Generis); and

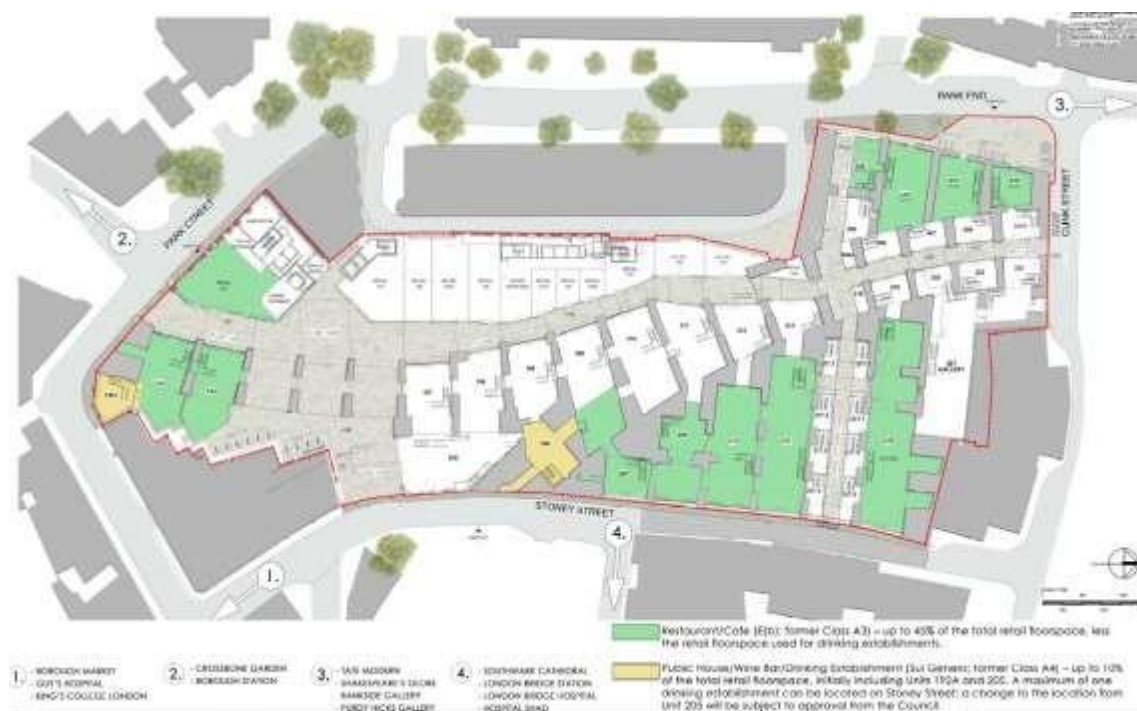
(c) no more than one unit on Stoney Street shall be used as a public house, wine bar or drinking establishment (Sui Generis).

The Class E(b) and Sui Generis uses allowed by this condition will be located only in the units identified in green on drawing reference 1405-SS-20-0G-01-200-P_1 unless otherwise agreed in writing with the Council.

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case and wishes to have the opportunity of exercising control over concentrations of Class A3 and A4 uses in accordance with Strategic Policy 13 - High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007 and the National Planning Policy Framework 2012.

21. An accompanying drawing has been submitted, as referenced at the end of the revised condition, which shows in green the location of the units to be in Class A3 restaurant or café use, and in yellow those to be used for Class A4 public house, wine bar, and drinking establishments. Together the Class A3 (shown in green) and Class A4 (shown in yellow) uses would be allowed to comprise up to 45% of the total retail floorspace, to align with the restriction in part (a) of the revised condition. The Class A4 drinking uses would be allowed up to a 10% of the total retail floorspace, (and this sits within the overall 45% cap, not additional to it) to align with the restriction in part (b) and with no more than one unit located on Stoney Street as restricted by part (c). The drinking establishments are shown for unit 192a on Park Street and unit 205 on Stoney Street. The other retail units (most of the white units) would be Class A1 shops. A larger form of this ground floor drawing and the first floor drawing are included as Appendix 2.



22. The areas indicated on this drawing and the accompanying floor area schedule show the following proposed site-wide split of Class A uses, with the proposed A3 and A4 floorspace on the above drawing totalling 44.7% of the floor area, slightly less than the proposed 45% cap (which would total 3,510sqm)

Use Class	Floor area (GIA sqm)	Percentage of Class A total
A1	4314.8	55.3%
A3	3157	40.5%
A4	327.5	4.2%
Site wide total of Class A	7799.3	100%

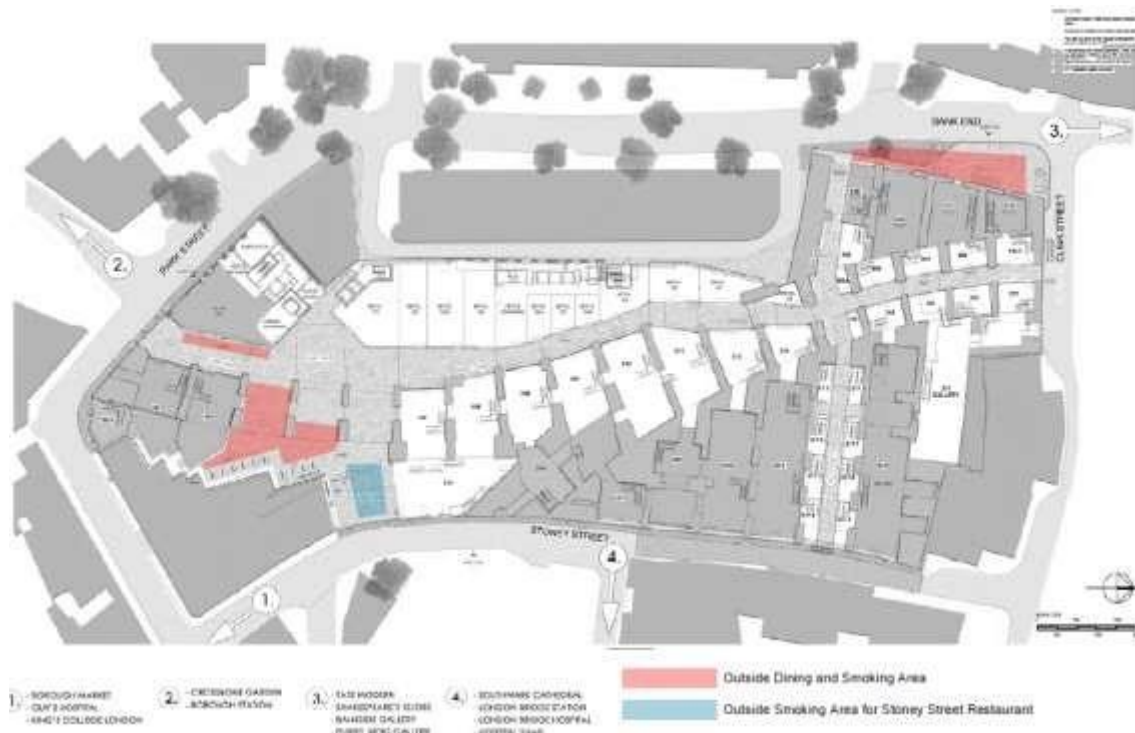
23. This can be compared with the approved scheme having 7,940sqm of Class A

uses, of which a 30% for A3 and A4 uses would total 2,382sqm. The current application's 45% cap represents an additional 1,128sqm being in restaurant or bar use on the site.

24. There are some minor changes to the sizes of the ground and first floor retail units from those that have been previously approved by the council in the 15/AP/3066 permission, subsequent non-material amendments agreed and a 2019 minor material amendment. The proposed changes are to seven units and result in an overall reduction in Class A area across the site of 141sqm.

Unit number	Unit approved Class A GIA sqm	Unit proposed Class A GIA sqm	Change in GIA Class A sqm
192	171.5	233.5	+62
192a	182.5	120.5	-62
199	228.5	233.0	+4.5
206	231.0	195.0	-36
207	211.0	204.5	-6.5
213	325.5	283.0	-42.5
215	523.0	462.5	-60.5
Site wide Class A total	7940.3	7799.3	-141

25. There are no proposed changes to the floor area of the development's gallery, cinema or office uses which remain as previously approved. The ancillary floorspace on the ground floor would increase from 161.5sqm to 328sqm, due to changes primarily to provide larger fire escape routes within some of the arches. The total site-wide GIA floor area would increase by 25.5sqm to 16,356.3sqm. New floorplan drawings for the ground and first floor levels have been submitted.
26. While not submitted for planning approval but only for information (and instead controlled through the licences), the applicant has indicated three external areas for outside dining and smoking (in red) and one area for smoking for the Stoney Street restaurants (in blue) on the diagram below. The area beneath the arches was revised through the licensing applications.



27. The proposal does not seek to make changes to the appearance of the buildings and railway arches of the approved scheme. Part of the mitigation proposed by the applicant includes the addition of a gate to the Park Street entrance, however no information about this gate has been provided and a further condition would need to be imposed to secure the details.

Variation of legal agreement application – 21/AP/0326

28. The second application ref. 21/AP/0326 seeks to make changes using a deed of variation to the 2017 section 106 legal agreement that is associated with permission ref. 15/AP/3066. The applicant seeks to amend the section 106 agreement's "Small Enterprises" definition relating to small retail businesses from those with no more than 3 retail outlets to those with no more than 10 retail outlets. This would allow a wider range of retailers to occupy the independent retail units, which were secured in the permission and must comprise a minimum of 60% of the total retail floorspace within the development.
29. The original wording of the 2017 section 106 agreement defines "Small Enterprises" as:

"means small and medium sized enterprises that operate 3 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;"

30. The applicant would like to vary that definition to be:

"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 an Small Enterprise shall not include any Supermarket owner and/or operator".

31. There will be other changes needed to the 2017 section 106 agreement if the minor material application ref. 21/AP/0507 is approved, in order to secure the mitigation measures the applicant is proposing. For example, to require locking the gates at 10pm (rather than at 11pm as required by the section 106 agreement), and requiring updated versions of the servicing management plan and visitor management plan. These changes to the 2017 legal agreement could all be included in the same deed of variation.

Amendments to the applications

32. The two applications have been revised in response to the objections received, consultee responses and officer advice.
33. As originally submitted, the applicant sought to vary condition 28 to allow:
- 1) 50% of the retail area at ground and first floor levels to be used for food and beverage - *this was reduced to 45%*;
 - 2) no more than 25% of the retail area at ground and first floor levels to be public houses, wine bars and drinking establishments - *this has been reduced to 10%*;
 - 3) and to allow no more than three units on Stoney Street to be public houses, wine bars and drinking establishments - *this has been reduced to one.*
34. These revised terms are set out as the three restrictions in a revised condition 28 described earlier in this report. The applicant has provided an additional plan showing the location of the restaurant and drinking establishment units and one Stoney Street drinking establishment unit, which would be referred to in the revised condition 28. The revised condition would require any future changes to the location of restaurant and drinking establishment units to need the approval of the council.
35. A supplementary planning statement with several supporting documents as appendices was provided to describe the revisions and provide more information, including the updated ground and first floor layout drawings and reference to the addition of a gate at the Park Street entrance. The supporting appendices aim to respond to the objections received to the original form of the application.
36. The applicant also sought originally to change more of the section 106 agreement's definitions and obligations, especially those relating to the gallery at the northern end of the site: to widen the definition of "cultural space" to include indoor sport, recreation or fitness; removal of the requirement for the gallery space to be available prior to the opening of the independent retail units; and relaxation of the obligations to allow the gallery/recreation space to be used for retail and commercial uses if there is demonstrated to be no demand after 12 months of marketing. These elements relating to the gallery unit have been removed from the s106 variation application, and so have not been considered in the Assessment section below.

37. The applicant provided an amended ground floor drawing and ground floor uses drawing (which corrected the wall dividing units 192 and 192a), and an additional drawing to show the proposed first floor uses that will be referenced in the revised condition 28.

Consultation responses from members of the public and local groups

38. The consultation undertaken for the minor material amendment application and list of those who responded are set out in Appendix 5 and 6.
39. Approximately 100 objections were received, including from ward councillors, which raised the same principal topics, summarised as:
- The proposal is moving away from the approved scheme of high end retail and cultural uses on the site that would fit in with the area.
 - Harm to the character of the area.
 - No need for more restaurants and bars as the area is saturated with them.
 - Loss of the gallery being unacceptable in a strategic cultural area.
 - Harm to neighbour amenity from late night noise and disturbance, drunken and antisocial behaviour, taxi noise, shouting, extra rubbish.
 - Additional servicing, deliveries and takeaway traffic – which would raise safety concerns, worsen air quality, and cause further noise and disturbance.
 - Overdevelopment.
40. A detailed summary of the consultation responses received is set out in the later Community involvement and engagement topic of this report.
41. There were objections to the s106 application including from the ward councillors, and references in the objections to the minor material amendments application:
- Diluting the vision of the original scheme (sold as artisan, independent, small units to complement the offer in Borough Market, providing shopping opportunities for the local and wider community) by allowing large chains into the site.
 - It will lead to a different development, especially with the changes sought by varying condition 28.
 - The restriction should remain, and ideally for the spaces to be marketed as an opportunity to support Southwark based businesses to develop, at a price they can afford to pay.
42. Reconsultation was carried out on the revisions to the proposal on 3 June 2021, and approximately 50 further objections were received including from ward councillors:
- That the revisions do not do enough to address the original objections. Still adding too much food and beverage in an already saturated area.

Retail is badly needed. The Covid downturn is not enough reason to ignore planning policies and harm the character of the area.

- The offer of 45% dining and drinking would entail extra servicing, waste, more noisy and longer occupation, more highways congestion from taxis and Ubers, more smokers and more late-night disturbance, none of which has been sufficiently mitigated.
- Insufficient mitigation or technical assessment of the noise impacts.
- Would still erode the character of the approved scheme, and harm the character of the area.
- Would still harm neighbour amenity. The F&B units are too big and too close to residents, and weren't acceptable in the original scheme.
- The additional servicing traffic cannot be accommodated on site, and will block surrounding roads. Not enough information is provided on how taxis will be managed; taxis will cause further noise, disruption and congestion.
- No revision made to the definition of "small enterprise". Large chains are intending to move in.
- The licensing conditions should be replicated on any planning permission, plus additional restrictions.

Planning history of the site

43. The decisions which are directly relevant to the consideration of the current applications are referred to within the appropriate sections of the report, especially the original 2017 permission. A fuller history of decisions relating to this site, is provided in Appendix 3, but does not list out the many submissions made to discharge conditions and planning obligations pursuant to the original permission or subsequent minor material amendment application. A recent screening opinion for the current scheme was issued in June 2021 to confirm that the proposal is not EIA development.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

44. The ability to vary an extant planning permission is set out in section 73 of the Town and Country Planning Act 1990 (as amended). Unlike an application for 'non-material changes' (a section 96a application), an application under section 73 results in a new permission being issued, although the time given to implement the permission remains unchanged, and is not extended as a result of any section 73 permission. While a local planning authority should take into consideration all relevant matters, including current policies at the point it determines a section 73 application, it must also take into account the scope of the changes being requested, and the status of the permission in terms of how far construction has progressed.
45. The main issues to be considered in respect of these two applications are those set out in the report for the 2015 application listed below. However as a minor material amendment application to an implemented permission with construction nearly complete, the correct focus needs to be on the changes proposed, rather than reassessing the whole development against current

planning policies and material considerations. Section 73 requires the local planning authority to look at the changes proposed by the amendments to the conditions and not to 're-visit' the principles on which the original permission was determined and granted.

46. The issues to be assessed focus on those raised by the proposed changes:
- Principle of the proposed development in terms of land use (and independent retail)
 - Design, including layout, building heights, massing and heritage impact;
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area
 - Transport and highways
 - Environmental matters
 - Energy and sustainability
 - Other matters - including archaeology and EIA
 - 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.
47. These matters are discussed in detail in the 'Assessment' section of this report.

Legal context

48. 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 local planning 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.
49. 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 and material considerations

50. The statutory development plans for the borough comprise the London Plan (2021), Core Strategy (2011), and saved policies from the Southwark Plan (2007). The National Planning Policy Framework (2019) and emerging policies constitute material considerations but are not part of the statutory development plan. A list of policies and material considerations which are relevant to this application is provided at Appendix 4. The adopted and emerging planning policies which are particularly relevant to the consideration of this application

are highlighted in the Assessment section of the report below.

51. The site is located within the:
 - Central Activities Zone (CAZ)
 - Bankside, Borough and London Bridge Opportunity Area
 - Borough and Bankside district town centre
 - Bankside, Borough and London Bridge Strategic Cultural Area
 - Borough High Street Conservation Area
 - Borough, Bermondsey and Rivers archaeological priority zone
 - Air quality management area.
52. 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.
53. There are grade II listed buildings adjacent and opposite the site:
 - nos. 1-11, 13, 21 and 23, 20-26 Park Street and the posts in front of 21 and 23;
 - the floral hall portico of Borough Market on Stoney Street;
 - Winchester Wharf on Clink Street; and
 - the Anchor public house and five posts outside it on Bank End.
54. The site is within the background of the LVMF view from Kenwood viewing gazebo to St Paul's Cathedral. The north-eastern corner of the site on the eastern side of the railway lines is also within the LVMF view from Parliament Hill summit to St Paul's Cathedral.
55. The site is not an allocated site in the adopted development plan, nor in the emerging New Southwark Plan.

ASSESSMENT

Principle of the proposed development in terms of land use (and independent retail)

Relevant policy designations

56. The application site is within the Central Activities Zone (CAZ). London Plan policy SD4 'The CAZ' seeks to promote and enhance the rich mix of strategic functions and local uses (in part A), to sustain and enhance the distinct environment and heritage of the CAZ (in part C), to promote and enhance the cultural, arts, entertainment, night-time economy and tourist functions (part E), and refers to supporting the vitality, viability, adaptation and diversification of CAZ retail clusters, including locally-oriented retail and related uses (part F). Strategic targets policy 2 of the Core Strategy sets out the vision of the CAZ with developments supporting the continued success of London as a world-class city as well as protecting and meeting the more local needs of the residential neighbourhoods.

57. The London Plan categorises the Bankside and Borough town centre as a “CAZ retail cluster”, which it considers to be “*significant mixed-use clusters with a predominant retail function and in terms of scale broadly comparable to Major or District centres in the London Plan town centre network*”. The London Plan acknowledges that wider trends in consumer expenditure and the emergence of multi-channel retailing present both challenges and opportunities for retailing within the CAZ, and gives support to adapting and diversifying the CAZ retail clusters.
58. The site is also within the Bankside, Borough and London Bridge Opportunity Area. London Plan policy SD1 ‘Opportunity areas’ seeks to encourage and deliver growth and regeneration potential for new homes and jobs along with investment and infrastructure. The vision for this opportunity area is to be “*home to a mix of uses providing high quality office accommodation alongside world-class retail, tourist, culture and entertainment facilities and public space*” in strategic targets policy 2 of the Core Strategy. Strategic policy 10 ‘Jobs and businesses’ of the Core Strategy protects existing business space and supports additional business (office) space within this opportunity area and the CAZ.
59. The site is within the Bankside and Borough designated town centre. This district town centre is mentioned in strategic policy 3 ‘Shopping, leisure and entertainment’ of the Core Strategy, with support for the provision of new shopping space which should include both food and non-food space, and aim to the meet the needs of local residents as well as visitors and businesses. Part 3 of the same policy seeks to protect and enhance town centres “*by ensuring that the scale of new development is appropriate to their role and character, that a balance of different uses, including shops, bars, restaurants and cafes is maintained, and that (the council) support the provision of markets*”.
60. As a town centre location, saved policy 1.7 ‘Development within town and local centres’ of the Southwark Plan is also relevant and states that within town centres the council “*will permit development providing a range of uses, including retail and services, leisure, entertainment and community, civic, cultural and tourism, residential and employment*” where nine criteria are met. These are considered later in this assessment. There is no protected shopping frontage in the application site.
61. For completeness, while the applications no longer seek to change the gallery use on the site, the site is within the strategic cultural area. This designation is referenced in strategic policy 10 of the Core Strategy (which protects creative, cultural and tourism facilities and encourages new facilities particularly in strategic cultural areas) and saved policy 1.11 of the Southwark Plan which protects existing facilities and sets criteria for new arts, culture and tourism facilities to be supported.
62. The part of the site to the north-east of the railway lines (along Stoney Street and a short frontage on Clink Street) is within the Thames Policy Area. Saved policy 3.29 ‘Development within the Thames Policy Area’ protects and enhances the Thames-side area, its historic character, appropriate waterside uses and requiring a particularly high standard and urban design. Core Strategy policy 12 states that the design of development in the Thames Policy

Area will be carefully managed to be sensitive to the many special qualities of the river.

63. The draft New Southwark Plan is not adopted policy but is a material consideration as it has reached its final stages towards adoption. The following draft NSP policies are relevant in terms of the revised proportion of Class A uses on the site:
- Draft policy P31 'Small shops' requires small shops (said to be all Class A) to be retained where at risk of displacement from a development, and for developments proposing 2,500sqm or more of retail space to provide at least 10% of the space as small shops (i.e. measuring less than 80sqm).
 - Draft policy P33 'Railway arches' requires development within railway arches to provide commercial activities including business uses (Class B), main town centre uses (Classes A1-A4) and community facilities (Class D) and to promote the delivery of the Low Line walking route by providing active frontages and safe, accessible spaces for pedestrians.
 - Draft policy P34 'Town and local centres' directs main town centre uses to town centres; requires the scale and nature to be appropriate to the role and catchment of the centre; retain Class A retail floorspace; not harm the amenity of surrounding occupiers nor result in a concentration of uses that harms the vitality and viability of the centre; provide an active use at ground floor in locations with high footfall and; large schemes for main town centre uses (1,000sqm or more) to provide free public toilets, public drinking fountains and public seating.
 - The AV.02 Bankside and Borough Area Vision states the area is at the heart of commercial and cultural life of the capital, a globally significant central London business district with the local economy notable for its diversity including arts, culture, specialist retail, small businesses and entertainment. It states that developments should continue to consolidate the area as part of central London, an international destination for business headquarters, small businesses, tourism and transportation that is entwined with historic communities with local services, open spaces and excellent transport links.

Assessment from the Committee report on 15/AP/3066

64. Referring back to the report to Planning Committee in 2016 for the original application ref. 15/AP/3066, there are two paragraphs that are repeated here which summarised officers' assessment of that proposal in recommending the scheme for approval at that time. These two paragraphs are relevant to the changes the applicant is now seeking.

65. Paragraph 186 of the report to Planning Committee stated:

"The closure of Vinopolis has allowed for a re-use and redevelopment of this large and enclosed site. The provision of office and retail uses would be appropriate given the town centre location and would support up to 1,100 new jobs as well as providing a diverse range of retail uses which would complement Borough Market. Importantly, the majority of the new retail floorspace would be secured as independent units, with a smaller proportion

secured as affordable retail space. Conditions would be attached limiting the amount of Class A3 and A4 uses, as well as opening times which should satisfactorily protect neighbouring amenities as well as the character of the area. Overall, the mix of uses would add to the vibrancy of the area and reinforce its character as a distinctive and interesting retail and visitor destination.”

66. Paragraph 57 stated:

“The applicant has also agreed to accept a condition to prevent high street supermarkets from occupying the retail spaces, again to protect the special character of the area. In order to protect the amenities of the area, it is recommended that a cap be placed on the amount of floorspace that could be used for class A3 and class A4 uses (restaurants and drinking establishments). A cap of 30% of the total floorspace has been agreed by the applicant, which is in line with the suggestion from the Borough Market Trustees. The applicant has also agreed a plan showing the location of the potential class A3 and A4 units, in order to allay the concerns of residents in Clink Street about the impact of these uses on residential amenity. Conditions will also be attached to control opening and servicing hours for the retail units, and to prevent units from being combined to create larger retail or bar formats which could affect the character of the area. Visitor management and service management plans would be required through the s106 agreement to address concerns expressed by residents and other neighbours, including the Borough Market Trustees, about the wider impacts of the scale of the development if it is not properly managed and controlled.”

67. It must be noted that despite the wording in paragraph 57, the plan showing the location of the potential Class A3 and A4 units was described by the applicant as ‘illustrative’ and so not conditioned or included as a restriction on the permission subsequently issued. This drawing will be referred to later in this report as an indicative plan. The other conditions and section 106 obligations referenced in the paragraph were imposed on the permission.

68. Condition 28 limited the maximum percentage of Class A3 and A4 floorspace within the development. It was imposed by the council in order to protect the amenities of the area, and as noted in its reason, as set out below, the policies referred to relate to the environmental and amenity impacts (rather than policies relating to the principle of uses or town centres, for example):

“Notwithstanding the details on the drawings hereby approved, at any time, no more than 30% of the retail floorspace at ground and first floor levels shall be used for Classes A3 (restaurants and cafes) and A4 (drinking establishments of the Town and Country Planning (Use Classes) Order (as amended).

Reason

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case and wishes to have the opportunity of exercising control over concentrations of Class A3 and A4 uses in accordance with Strategic Policy 13 - High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007 and the National Planning Policy Framework 2012.

69. In submitting this minor material amendment application, the applicant has followed the correct process to propose varying the percentage restriction to the local planning authority. The reason for the condition forms the main focus of the assessment of the current application. The separate definition within the 2017 planning agreement for the businesses eligible to occupy the independent retail units would need to be amended through a deed of variation to the planning agreement, so again the applicant has followed the correct procedure to seek that amendment. The consideration of this request for variation follows later in this report.

Proposed amendments to condition 28

70. The 2017 permission ref. 15/AP/3066 has been implemented, with construction across the site nearing completion. The permission approved Class A1, A3 and A4 uses across the ground and mezzanine levels, Class B1 office use in a new building, a Class D2 cinema mainly within the basement and a Class D2 gallery within an arch unit at the northern end of the site. Subsequent to the 2017 permission there have been non-material amendments and a minor material amendment agreed that have resulted in changes to the precise floor areas of the different uses. This application seeks to make variations to a 2019 planning permission (before the introduction of Class E nationwide in 2020 that moved A1, A3 and A4 uses into Class E(a), Class E(b) and sui generis uses respectively), and this report will refer mainly to the approved Use Classes. Planning policies, including those in the emerging New Southwark Plan refer to the Class A uses.
71. The approved scale and layout of the office, cinema and gallery uses of the implemented scheme remain, and the retail layout is also unchanged except for a small reduction of 141sqm in the GIA retail area (to provide fire escape corridors). The Class A retail use of the units across the ground and first floors, primarily within the railway arches would remain broadly as previously approved with this reduction, but it is the quantum of specific uses within Class A that the applicant is seeking to change by revising condition 28 to allow more Class A3 and A4 use (to increase from the approved maximum of 30% of the floorspace to 45%), and a corresponding reduction Class A1 use (from a minimum of 70% to a minimum of 55%). Using the applicant's submitted layout of how the A1 shops, A3 restaurants and A4 drinking establishments would be apportioned across the site's units and comparing it with the indicative drawing from the original application, this would result in 14 potential restaurants and bars, up from 11 restaurants and bars on the indicative drawing of the approved scheme (although it involves the two very largest units, and another unit that has been subdivided into two since the 2017 permission).
72. The proposed change needs to be seen in the broad context of planning changes made by government in the last year. The nation-wide changes to the Use Classes Order in 2020 that created a new Class E "Commercial, business and service" category mean that Class A1, A2, A3, B1, and many D1 uses now fall within the same broad Class E, and mean that it is no longer 'development' to move between these former use classes. This allows shops (formerly Class A1) to change to restaurants (formerly Class A3) and vice versa across the country without needing permission, unless there is a site-specific restriction.

This change in the government's approach to how retail, commercial, indoor sport and medical uses are now viewed as one planning use class should be borne in mind in the assessment of this application, as an indication of the expectation to allow diversification across town centres without requiring permission from the local planning authority. However, a planning application is needed for this Borough Yards site as the uses are specifically restricted by the 2017 planning permission.

73. The policies within the London Plan, Core Strategy and saved Southwark Plan policies regarding land uses mainly use the term "retail" to mean all Class A uses, rather than specifying A1 shops, A3 restaurants and cafes etc. They do not support specific uses within Class A retail functions over others within the CAZ, Opportunity Area or town centres, but support retail and shopping functions. The exception is for protected shopping frontages, where specific proportions of Class A1 are required to be maintained, with the reason stated as being to protect a mix of local services. As the site is not within a protected shopping frontage, the proportion of Class A1 shops is not specified in relevant planning policies.
74. The London Plan 2021 as the most recently adopted part of the development plan acknowledges the wider trends affecting retail across London (particularly online shopping) even before the pandemic. In part F of policy SD4 the London Plan gives support to adapting and diversifying CAZ retail clusters, including locally-oriented retail and related uses. The proposed change within the Class A range of uses (which would change 1,128sqm from shop use to A3 and A4) to allow more restaurants and bars would align with this policy.
75. The Core Strategy in policy strategic policy 3 'Shopping, leisure and entertainment' part 1) says that in the Bankside and Borough district town centre "*We will support the provision of new shopping space in Bankside, Borough and London Bridge. This should include both food and non-food space and aim to meet the needs of local residents, as well as visitors and businesses*". The approved redevelopment of the former Vinopolis site met this section of the town centres policy by providing new shopping space, in a range of Class A1, A3 and A4 uses, and would continue to do so with the revised proportions of these same uses. A minimum of 55% of the Class A floorspace would remain in shop use and so could provide shops that meet the shopping needs of local residents. The proposed mix within the site is also considered to comply with part 3) of the same policy which ensures "*that the scale of new development is appropriate to their role and character, that a balance of different uses, including shops, bars, restaurants and cafes is maintained*" by keeping a minimum of 55% of the floorspace as shops, and adding a restriction on the proportion of A4 drinking establishment use. The change to allow three more restaurant and drinking units (albeit two very large units) is considered not to result in a harmful balance of uses within the Borough Yards site, nor within the site's context, nor the wider town centre designation across Bankside and Borough.
76. Turning to the Southwark Plan, the proposal has been assessed against the nine criteria of saved policy 1.7 'Development within town and local centres' of the Southwark Plan as it is within a town centre. The proposed variation of condition is considered to comply with the policies for the following reasons:

- i) The scale and nature of the proposal is appropriate to the character and function of the centre and the catchment area it seeks to serve, by remaining in Class A use and a variety of unit sizes, with the continued restrictions to prevent a supermarket from occupying and requiring any merging of units to be approved by the council.
- ii) The proposal will not harm the vitality and viability of the centre. The change is sought by the applicant to respond to the market conditions where there has been interest from restaurant and drinking establishment operators wanting to move to the site, but fewer shop operators (see later in the assessment). The proposed change would make it more likely that this new development would be occupied, rather than risk empty units.
- iii) A mix of uses is provided both within the split of the Class A uses as well as the offices, gallery and cinema on the application site.
- iv) The floorspace approved to be Class A use would be retained with a very small reduction in GIA of 141sqm (representing 1.7% of the approved retail area) following the scheme's detailed design revisions.
- v) The impact on neighbour amenity is a later assessment topic, but in summary is found to be acceptable subject to securing the proposed additional mitigation measures.
- vi) The site is highly accessible by public transport with a PTAL of 6b (the highest).
- vii) The additional traffic and servicing requirements of changing from shops to restaurants and bars is considered later in the Assessment, but in summary is found to be acceptable.
- viii) The units across the site would maintain their frontages onto the surrounding streets or onto the new pedestrian routes through the site alongside and within the railway arches.
- ix) The proposal does not provide public toilets, nor was this a requirement of the 2017 permission.

77. There is policy support for responding to the wider retail market decline of A1 shopping space. There is no policy requirement for this site to provide a certain percentage of A1 shop use nor to discourage A3 and A4 uses in principle, and therefore the consideration of this application is focussed on the extent to which the restriction remains justified and an assessment of any harm which would arise from the changes.

78. The applicant has carried out its own study of uses in the area. The diagram below was provided as part of the supplementary Planning Statement. It shows the prevalence of restaurant and drinking establishments (shown in dark green), and Borough Market in the brighter green on the western side of Borough High Street and northern side of Southwark Street, and how the proposed 45% scenario of restaurants (in green) and bars (in yellow) on the application site would appear within this context. With the approved scheme in place (using the indicative plan) there would be 73 cafes, restaurants and bars in the area, with the proposed scheme in place this would rise to 76.



79. Officers consider that the proposed change to increase the proportion of restaurants and drinking establishments would be appropriate within the context of the site which is opposite or close to nearby properties that are in the same uses, and by concentrating the shops along the new routes through the site to cluster them and help focus their footfall. The mix of uses within the proposed variation of condition 28 would comply with the land uses policies in the development plan, but to refer back to the reason for condition 28, it is important that the environmental impacts and amenity impacts are considered against the policies referred to in the reason, and this is carried out in later stages of this assessment.
80. Officers have considered whether there are material considerations that should override the usual expectation that decisions are made in line with the development plan policies. In terms of draft policy P34 'Town and local centres' of the emerging New Southwark Plan, the proposed revisions would retain at least 55% Class A retail floorspace within this town centre location, and it would be of the scale previously approved by the original permission in a series of retail units of varying sizes. The change to increase the number of restaurant and drinking establishments on the site would not lead to a concentration that would harm the vitality and viability of the town centre. The impact upon the amenity of surrounding occupiers is set out in a later topic. Active ground floor uses are provided across the site. While no public toilets, drinking fountains or seating are proposed (as required by part 6 of this draft policy), these were not requirements of the approved scheme. Toilets would be provided by the individual occupiers.
81. It would accord with the AV02 area vision for Bankside and the Borough, which recognises the very central location within London and the diversity of the local economy by continuing to provide 60% of the retail space to smaller businesses, and providing the Low Line extension adjacent to the retained

railway arches with lively accessible spaces for retail. The proposal would accord with draft policy P33 'Railway arches' of the New Southwark Plan which allows for main town centre uses of Class A1-A4 within railway arches. The public route through the centre of the site as an extension of the Low Line would continue to be provided (flanked by shop units on either side for most of its length), in line with draft policy P51 'Low Line'.

82. Draft policy P36 'Protected shopping frontages' does not designate the site as a new protected shopping frontage and so is not a material consideration for this application, however officers note that the protected CAZ primary shopping frontages within the Bankside, Borough and London Bridge Opportunity Area are to be at least 40% Class A1 shop units, which is the lowest proportion for shops within the borough's primary shopping frontages. This suggests the proposal for the application site's A1 area is 15% above the minimum that the local planning authority seeks to protect in the protected primary shopping frontages near to the site.

Marketing information

83. Aside from the policy support set out above, officers have given consideration to the marketing information submitted by the applicant to give the reasoning for the requested changes to condition 28, and to the definition of "small enterprises" in the section 106 agreement, based upon their experience of the market in recent years.

84. The applicant has provided quarterly marketing updates to the council since early 2019, as required by a planning obligation, to demonstrate the marketing undertaken to seek tenants for the independent retail units (which comprise a minimum of 60% of the Class A floorspace, and so applies to A3 and A4 uses as well as shops). Two short leasing updates were provided with the supplementary Planning Statement where the applicant has provided some background to why the minor material amendment application has been submitted, and the wider retail market changes.

85. The applicant's view is that:

"The planning application to amend Condition 28 is to help mitigate the impact the current leasing market is having on leasing progress, to enable the successful opening of the scheme on time, and to mitigate the risk of high vacancy. The crux of our challenge is to convince retailers to commit to a new retail development in the most challenging of times. The area has an established food & beverage offer however it is a new retail destination and therefore perceived with some risk from occupiers. A false start for Borough Yards would take years to redeem."

86. The applicant found that from 2017 onwards the retail sector was being affected by the well-reported impacts on high streets across the country such as: the rise of online shopping; brands reducing the number of stores; retailers going into administration; Brexit uncertainty; the growth of retail experiences with more restaurants and leisure to attract people; and retailers looking for more flexibility in leases. Despite these wider challenges in the retail sector, the applicant states it was confident that its leasing targets and timescales would

be met given the demand and interest in Borough Yards.

87. The impact of the Covid pandemic and lockdowns meant that London's retail leasing activity significantly slowed as businesses used their resources to keeping trading rather than opening new stores, and social distancing measures affected trading in the months that stores have allowed to be open. Central London saw reduced numbers of office workers and tourists, with a large amount of retail space available and little demand. The applicant has signed only one retail lease, for Paul Smith to move into unit 010 on a short-term lease. Other potential leases fell through for the applicant in 2020 as retailers have not been prepared to commit, citing to the applicant concerns of the return of office workers being needed to make Borough Yards a success, and concerns for retail after two more lockdowns. Another lease for a houseplant retailer for a small unit is on-going.
88. As lockdown restrictions and the pandemic ease, the applicant has found the letting market to be more difficult as pre-Covid trends have accelerated with more online shopping, more high street brands closing or moving online, resulting in an oversupply of retail space and reduced rents, and retailers finding it difficult to find funding for expansion. Retail demand has shrunk considerably. Retailers require more comfort from the applicant that Borough Yards will be a vibrant and successful scheme, more capital or a higher specification of fit out as they have difficulty sourcing funding, and wanting more flexible terms; the applicant has found this is particularly the case for independent retailers. The applicant sees their proposed scheme as a necessary adjustment to their approach to create the conditions that would encourage retailers to the site for the later phase of opening the site.
89. The applicant has found the food and beverage sector has been more resilient. Restaurants and bar operators have shown more interest in the external facing units with established footfall, and operators are willing to commit to Borough Yards now. The applicant is in legal negotiations for nine units, with the association with the established Borough Market food destination making a better link than other shopping types, and should attract shoppers, office workers and tourists to the site.
90. The applicant considers that progress with shop tenants is not at the pace necessary to ensure that Borough Yards opens with fully let retail units at the end of 2021. The supporting information states "*Opening a partially let scheme would not only discourage the current retail interest we have from committing but also would disappoint the consumer if we have a limited number of stores and restaurants open in a new retail destination. It is extremely difficult for new destinations to recover from a false start in the minds of the general public.*"
91. The applicant aims to open the Borough Yards site in two phases, with most of the restaurant units in late 2021 (focusing on Stoney Street, Bank End and Soap Yard, having secured tenants in summer 2021) and then the retail in spring 2022 (mainly along Dirty Lane within the site), and hopes that by opening the restaurants first it will "promote confidence" in the Borough Yards project, establish footfall, act as a catalyst to secure more retail lettings, and prevent vacant units. By focusing the retail in the centre of the site, the applicant aims to create a critical mass of shops, and allowing retailers to group

together in this pedestrianised new street. These occupiers would be in addition to the new cinema (Everyman) and office tenants that add to the mix of uses on the site.

92. The above sections summarise the applicant's reasons for the current application and is based on the applicant's reporting of the marking interest it has received. The decline of shops has been well reported, with high streets and town centres needing to diversify to attract people in, with restaurants and bars as a more leisure element within the retail use class playing a key role in this. The last year has impacted significantly on shops and has been unfortunately timed with the intended opening of this large development in a prominent part of the borough. The applicant's concern that without a successful first phase of opening to generate interest and business for the first units, the rest of the site may struggle to attract tenants for the second phase within the central part of the site appears reasonable in the circumstances.

Proposed change to independent retail criteria

93. The 2017 section 106 agreement requires a minimum of 60% of the Class A retail floorspace to be provided for and made available to small enterprises. It therefore applies across all Class A uses, not only to A1 shops. The 60% minimum includes the affordable independent retail units which are to be 15% of the retail floorspace, and provided for 40 years from the first letting. The applicant is not seeking to change these requirements as a result of the change in the proportion of shops, restaurants and bars, so the requirements for independent retail units and affordable retail units will continue to apply. What the applicant does want to change is the definition of "small enterprise" to allow flexibility for companies with more existing stores to move to the site.
94. The proposed change from small enterprises that operate no more than 3 stores to those with no more than 10 stores would allow larger businesses to move into Borough Yards (into the 60% of the Class A retail floorspace required to be independent retail units) and broaden the range of companies eligible to occupy the independent units in Borough Yards. There is no clear definition of an "independent" or "small enterprise" in terms of retail use in the development plan nor the NSP. The intention of the restriction was to avoid the site being dominated by "high street" brands and maintain the character of the Borough Market area as one with a distinctive retail offer. The expanded definition would allow businesses with some wider brand recognition to trade from the independent units, however, the limit of 10 current outlets would still exclude larger chains or national brands. On balance, and recognising that 10 existing outlets is an upper limit and many new occupiers could be much smaller or new traders, it is considered the limit would still maintain a diversity of retailers on the site and retain the local character. The proposed amendment to the definition is therefore considered to be acceptable.
95. The Core Strategy policy 3 refers to new shopping space within the Bankside and Borough district centre "*should include both food and non-food space and aim to meet the needs of local residents, as well as visitors and businesses*". The change to the definition of small enterprise would not necessarily affect whether a business is food or non-food retail, and given the economic impact of the pandemic would allow a wider range of businesses to take on the units

in this new development, and reduce the risk of having empty units. The proposal is considered to be consistent with this Core Strategy policy.

96. In terms of draft policy P31 of the New Southwark Plan, the small shops in the approved layout would be retained with the units (under 80sqm) of the proposed layout comprising 10.6% of the Class A retail floorspace. The proposal would accord with this draft policy as a material consideration.

Additional restrictions to be added to condition 28

97. Condition 28 limits the amount of Class A floor space that can be used for restaurant (Class A3) and drinking uses (Class A4) within the application site, but it does not restrict the proportion of A3 or A4 within that 30% limit, nor the number of units, nor their locations:

- It does not restrict how much of that 30% total retail floor space can be used by drinking establishments or restaurants, i.e. all 30% could be used for bars with 0% as restaurant use or vice versa, and still comply with the condition.
- The condition does not restrict the location of the restaurant and drinking uses to particular units. While a drawing was shared with the local community at the time of the Planning Committee for the 15/AP/3066 application which showed the suggested locations and further potential locations of restaurants and drinking establishments, and was referenced in the report to the Committee, this drawing was supplied for illustrative purposes only and not referenced on the decision notice nor made the subject of a condition that would restrict or fix the use of the units.
- Condition 28 does not restrict how many individual restaurants or drinking establishments there could be within the 30% floorspace. With a large range of unit sizes (from 12.5sqm to 767sqm) the 30% floorspace maximum could be accommodated across the site in numerous ways, without the council controlling which unit is used for which use.

98. Therefore the 15/AP/3066 permission leaves the applicant with flexibility in terms of the total number of restaurants and drinking establishments, and their locations up to the overall cap of 30% of retail area. This is an important point when considering the neighbour amenity impacts later in this Assessment, and is the applicant's fall-back position should the current applications be refused.

99. The submitted floorplan drawing that the applicant is proposing be included in the revised condition 28 shows how the units across the site can be arranged to fit within the proposed restrictions, with 55.3% shops, 40.5% restaurants and 4.2% drinking establishments (including one unit on Stoney Street).

100. The proposed amendments to condition 28 would allow the council more control over the number, floorspace area and location of the drinking establishments than the existing condition wording. This, as set out in more detail in the neighbour amenity section, gives additional controls which balance the larger overall proportion of A3 and A4 uses.

Conclusion on land use

101. Class A uses are supported in principle within the CAZ, Opportunity Area and town centre locations such as this application site. The proportion of A1 shops compared with other Class A uses is not set out in policies (other than for protected shopping frontages), but most instead refer to achieving a mix or balance of town centre/retail uses. The proposal seeks to change approximately 1,128sqm of approved Class A floorspace from shop use to restaurants and bar uses. The proposed variation of condition 28 would still achieve a mix of uses and retail types across the site, which is considered appropriate for this site, its context and character of the area, for the wider Bankside and Borough town centre, and noting the encouragement within the London Plan for diversifying retail centres within the CAZ. The office, gallery and cinema uses within the site would remain as approved. In principle, the increased proportion of restaurant and bar use on the site, and resulting decrease in shop floorspace is considered to comply with land use policies and the material consideration of the New Southwark Plan, with shop floorspace retaining a majority percentage. The consideration of the resulting impacts on neighbour amenity and the environment (with reference to the policies included in the reason for the imposition of condition 28) is set out in later topic sections.

Design, including layout, building heights, massing and heritage impact

102. The NPPF stresses the importance of good design, which is a key aspect of sustainable development, and the requirement to conserve and enhance the historic environment. Policy SP12 of the Core strategy states that “Development will achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.” Saved policies 3.12, 3.13, 3.15 and 3.16 of the Southwark Plan require high quality developments, that preserve or enhance the historic character of buildings or areas, including conservation areas.

Site context

103. The townscape and heritage context of the site remains very similar to that of the original application. Work is well advanced on site to restore the railway arches, open up the routes through, construct the new Park Street office building behind the retained Thames House façade, and the new 16 Park Street retail building. The site faces onto a mix of neighbouring sites in residential, retail and office use, and close to Borough Market to the south-east. The southern part of the site is within the Borough High Street Conservation Area.
104. The site sits within the background assessment area for protected view 3A.1 from Kenwood viewing gazebo to St Paul’s Cathedral, and the north-eastern corner is within the LVMF view from Parliament Hill summit to St Paul’s Cathedral. The site is within the Southwark Bridge river prospect view 12 of the London View Management Framework. The heritage assets in the area are considered below.

Site layout

105. The site layout remains the same as previously approved with the retained railway arches, new Park Street buildings, and public routes across the site that would form part of the Low Line to open up a site that was not publicly accessible previously. The 2016 report to Planning Committee concluded that *“the proposed site layout and arrangement of buildings within the site would improve accessibility as well as creating active frontages which would enhance the pedestrian environment”*. This remains with the current proposal.

Height, scale and massing

106. The heights, scale and massing of the buildings and retained arches are not changing from those of the approved scheme. The revisions to the floor areas of the retail units are internal to the site and so no raise issues of height, scale or massing.

Architectural design and materials

107. Similarly, the proposed changes would not affect the appearance or architecture of the office building under construction nor the retained arches. In this regard the proposal would not affect the built environment of the site or its townscape context.

Landscaping, trees and urban greening

108. The only change to the approved landscaping would be the addition of a gate on Park Street. This would not significantly change the overall landscaping scheme of the site which is subject to condition 16 of the original permission, along with the green roof details for condition 15.

Designing out crime

109. Saved policy 3.14 ‘Designing out crime’ of the Southwark Plan requires developments to be designed to improve community safety and crime prevention. Condition 10 on the original permission required further details of the security measures to be incorporated in the development, and has been discharged.
110. Many of the objections received referred to the increase in anti-social behaviour and crime for the increase in restaurant and drinking establishment uses.
111. The Met Police were consulted on the application and other than passing the application to the council’s Licensing team, the Police had no comment to make with regards to security and Secured By Design measures. The security standards and requirements previously discussed and agreed with the development team for this project would apply to the proposed amendment, and condition 10 would become a compliance condition.

Heritage impacts

112. The site is within the Borough High Street Conservation Area at its southern end and immediately adjacent to it on the eastern side. The Borough High Street Conservation Area Appraisal shows the site is within and adjacent to sub area 3 which extends from the riverside down to the east-west railway lines. The appraisal in paragraph 1.2.7 notes for this sub-area:

“At the northern end of Borough High Street, movement of people and traffic dominates the environment, related especially to London Bridge, the junctions of Southwark Street and Tooley Street (Duke Street Hill) and London Bridge Station. By comparison, the environs of the Cathedral, below the busy level of London Bridge, are astonishingly quiet. Again in strong contrast, the narrow wharveside character of Clink Street lies immediately beside the Cathedral: it has now become a commercialised tourist area, popularising its sometimes grim social and industrial past. The narrow streets of the old warehouse area extend into the bustling, robust environment of Borough Market: there can be few markets left with such a powerful townscape form”.

113. In describing the character and appearance of the area for sub-area 3, Borough Market is referenced as contributing to the character of the streets as follows:

“The functioning market influences every aspect of the physical character of the area between Southwark Street and Borough High Street. It contributes fundamentally to the special quality of Park Street, Stoney Street and Bedale Street. It generates the atmosphere of the pubs, the early morning cafés, the lock-up shop-fronts and street activity. Only this active market function can truly preserve its unique structures and setting and the character they create.”

114. Similarly the character and appearance of Park Street is noted in paragraph 3.4.15 of the appraisal:

“West of the market, the angular street pattern continues into Stoney Street and Park Street, and Park Street is crossed by the western arc of the railway viaduct. On the south side, Park Street has a particularly good line of early 19th century houses (designed by Henry Rose, 1831), converted later in the 19th century to shops: these include some good traditional shop fronts. The strong line of the three-storey façade turns sharply and passes below the railway, closing the westward view, and the viaduct completes the enclosure of the street space. Lively retail businesses related to the market occupy shops on both sides of the street, and the corner buildings onto Stoney Street are particularly strong (no. 9 is the Market Porter pub, brightly decorated and decked out in flowering hanging baskets).”

115. The site is within a mixed use area that includes residential (a variety of houses, flats, converted wharf buildings and new developments) and a substantial proportion of commercial uses, shops, restaurants, bars and pubs including Borough Market, along with offices, Clink Prison Museum and education uses. These uses are noted in the sections of the conservation area appraisal as adding to the special quality of the streets, with lively retail businesses. The prevalence of other restaurant and drinking establishment

uses within the area, including this sub-area of the much larger conservation area, is indicated by the applicant's diagram included at paragraph 78 above. The change within the Class A use category to add more restaurants and drinking establishments on the site is considered to preserve the character and appearance of this part of the Borough High Street Conservation Area, and cause no harm.

116. As the only change to the physical appearance of the approved development, details of the additional gate would be required by a proposed condition to ensure they are appropriate for this townscape and conservation area, and setting of the grade II listed buildings on the opposite side of Park Street.
117. Objection comments refer to the increased number of chain brands on the site harming the character of the area with its independent retailers; the planning obligation requirements regarding independent retail units to a minimum of 60% of the Class A floorspace would continue to apply, and for the reasons set out above the change to allow larger businesses (that have up to 10 stores) is considered on balance to be acceptable. These would remain relatively small brands and would not allow the larger high street retailers to take on more than 40% of the floorspace. Supermarkets are not allowed by an existing condition and planning obligation which would continue to apply.
118. As well as the physical appearance of a property or the area, the character of a property or an area is influenced by the type of the occupying businesses. Once planning permission is granted for the land use, and in the case of this site the requirement for independent retail units, the local planning authority cannot control the specific occupier or business that moves into a unit, how "upmarket", "high-end" or "tasteful" (or not) it is. That would be for the owner of the properties to consider when offering leases to new tenants. The applicant has not provided details of the potential occupiers in its planning application, although in the Licensing Sub-Committee meeting the applicant referred to Dishoom, Vinoteca, Happiness Forgets, Pizza Pilgrims, Burger and Beyond and Barrafina (who have submitted a separate application to merge three units). Other than restricting the proportion of use classes, and continuing to require independent retail units to be let to relatively small enterprises, the local planning authority cannot further control the chosen tenants to curate the development.
119. Allowing more units to be in restaurant and bar use within this mixed use site (that has permission for Class A uses) and with no significant changes to the external appearance of the development (with the exception of adding a gate with further details to be conditioned), is considered to cause no harm to the setting of surrounding grade II listed buildings.
120. The application site is within the background of the LVMF view from Kenwood viewing gazebo to St Paul's Cathedral, and the north-eastern corner is within the LVMF view from Parliament Hill summit to St Paul's Cathedral. It is also visible from the Southwark Bridge river prospect view 12 of the London View Management Framework. As no changes are proposed to the height or external appearance of the approved scheme, the proposal would have no impact on these LVMF views.

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

121. Core Strategy strategic policy 13 'High environmental standards' in part 8 refers to setting high standards and supporting measures for reducing air, land, water, noise and light pollution, avoiding amenity and environmental problems that affect the enjoyment of the environment in we live and work. This policy is referenced in the reason for condition 28. Saved policy 3.2 'Protection of amenity' of Southwark Plan is also referred to in the condition's reason. This policy states that permission will not be granted where it would cause loss of amenity including disturbance from noise, to present and future occupiers in the surrounding area. London Plan policy D14 'Noise' requires proposal to avoid significant adverse noise impacts on health and quality of life, mitigate and minimise the adverse impacts of noise in the vicinity of new development.

Outlook and privacy

122. The site is very close to residential properties on the opposite sides of Stoney Street (5-6m) and Clink Street (8m) and immediately adjacent to nos 20-26 and 12-14 Park Street.
123. The relationship between the retail units on the site and the surrounding properties would remain as there are no proposed amendments to windows or to the form of the approved buildings that are under construction. Condition 26 of the 2017 permission requires the Stoney Street railway arches on the first floor elevation to be obscure glazed and fixed shut in order to protect the privacy and amenity of the neighbouring properties on the eastern side of Stoney Street. This requirement would remain and is not sought to be varied by the applicant, who has acknowledged that the upper windows are currently clear glazed. They have confirmed that these windows will be obscured prior to occupation. The condition would be reimposed on any new permission. A condition of the licence for unit 192A is that the first floor flat roof area is not used as a terrace; the applicant has agreed for this to be an additional condition of any new permission.

Daylight, sunlight and overshadowing

124. The only change to the external appearance of the scheme is the gate to the Park Street entrance. While no detail of its location, height or design has been provided, with the entrance being alongside the 5-storey Park Street building and opposite the Redcross Way highway it is unlikely to harm neighbour amenity. Its precise siting, height and form would need to be secured by an additional condition.

Odour

125. The higher proportion of restaurants and bars would likely result in more commercial kitchens on the site. Condition 21 relating to commercial kitchen extract equipment would be reimposed on any new permission to allow the

environmental protection team to consider the submitted technical details for each restaurant unit, and prevent significant odour issues to surrounding properties.

Noise and vibration

126. The objections received refer to the harm to residential amenity from additional noise - particularly late at night - by including more food and drinking uses on the site, from the kitchen equipment, music and the comings and goings of people and vehicles on the surrounding streets, and antisocial behaviour, which the approved shop use would not cause.
127. The proposed plan to control the location of the A3 and A4 units shows all but two to be located on the external-facing sides of the application site, opening onto Stoney Street, Park Street and Bank End. This means, with the exception of a couple that open onto Soap Yard, the proposed units would face onto neighbouring properties. The neighbouring properties are within a central location, near the railway viaducts and road. As set out in the many objections received they currently experience levels of noise and anti-social behaviour from visitors to the area's shops, food and drink outlets, particularly at weekends.
128. The approved 2017 scheme (and its later approved amendments) came with an acknowledged associated level of noise and disturbance for nearby residential properties. The mitigation measures secured in the original permission sought to reduce these to an acceptable level such as conditioning: the opening hours; servicing hours; the proportion of retail floorspace to be A3 and A4 uses; and the planning obligation requirement for a visitor management plan. Condition 28 of the 2017 permission restricts the overall proportion of unit floorspace that can be used by A3 and A4, but does not restrict where on the site these uses could go; the restaurants and bars can be located in any retail unit of the scheme at ground and mezzanine levels, and comply with the permission up to the site-wide cap of 30%. The 30% floorspace cap of the original permission allows for all of the Stoney Street units to be occupied as restaurants and drinking establishments.
129. As the permission does not restrict the use of the retail units within Class A aside from the site-wide cap, it is not possible to make a direct comparison in terms of the number of units in any particular use or whether any particular unit would turn from a shop to a restaurant or bar. In the current submission, the applicant has compared the indicative plan of the approved scheme to the current plan. The two diagrams are set out below. While comparing them provides an indication of the changes, with multiple combinations of how the 30% cap could be accommodated in the approved scheme it cannot give definitive unit numbers or locations.



Indicative drawing from the 15/AP/3066 application showing restaurants in green, "potential A3 units" in turquoise, shops in light blue and gallery in dark blue. The office entrances are shown in pink, the cinema entrance in orange. NB the left-hand most unit comprises two units (192a and 192) on the approved floorplans, but the division is not shown on the drawing above.



Submitted drawing for current application ref. 21/AP/0507 showing restaurants in green, drinking establishments in yellow.

130. The main changes are at the northern end of Stoney Street (the bottom right hand side of the diagrams) where a row of restaurants is proposed, including changing two large units that were indicated as shops into restaurants. These units face onto residential properties on the eastern side of Stoney Street. Some of these residential neighbours are sited above a restaurant and a coffee

shop, and look onto another restaurant at the corner of Clink Street and Stoney Street. One other additional restaurant unit is proposed on Bank End (at the top right hand corner of the drawings) opposite a hotel and The Anchor pub. A bar unit is proposed on Park Street (at the left hand side of the drawings) which was previously indicated to be a restaurant, next to and opposite residential properties, and at the end of a section of Park Street that contains shops, a coffee shop and the Market Porter pub. Within the centre of the site, the units are all to become shops.

131. The comparison indicates the number of restaurants increasing from the indicative 11 shown in green, to 14 in the current scheme, and a decrease in the number of A1 shop units from 41 to 39. The numbers do not completely align as one indicative restaurant unit (unit 229) was agreed to be subdivided in two since the 2017 permission to be now a restaurant and a shop. The proposed units range in size, with two of the “additional” proposed restaurant units being the largest on the site; this is an important caveat when comparing the number of units. Two units on Stoney Street were indicated in turquoise as “potential A3 units” that might have been used as restaurants if other units were changed to shops to stay within the site-wide limit. These two potential units were in addition to two A3 units to give a total of four non-retail units on this road in the indicative drawing, compared with the six now proposed (five restaurants, 1 bar).
132. With the additional restaurant and drinking establishment floorspace now proposed in the identified units, the applicant has proposed additional mitigation measures on top of those secured in the 2017 permission and section 106 agreement which would continue to apply as well as the revised condition 28.
1. Closing the gates within the site at 10pm, including a new gate at the Park Street access next to the railway lines. After 10pm this would leave only the Soap Yard access onto the southern end of Stoney Street open for the central part of the site, and the majority of the individual units that open directly onto the streets. This would assist in stopping some people working south through to Park Street next to Thames House and instead direct them through the southern end of Stoney Street towards Borough Market (in the direction of the stations and main Borough High Street and Southwark Street roads). The majority of the proposed restaurant and bar units would still open onto the surrounding streets (public highways).
 2. The applicant will require all tenants to comply with a “Tenants Handbook”, which will be appended to the Visitor Management Plan that is required by the section 106 agreement. The Tenants Handbook will include controls relating to the management of deliveries (including the hours restricted by a planning condition), the role of the site management team in escorting any drunken visitors or people loitering, the management’s ability to ban customers who continually cause trouble within the site. It would also detail:
 - A postcode to give patrons for booking taxis to direct taxis to the Soap Yard entrance on Stoney Street.

- Require occupiers to display a sign within their unit which asks patrons to leave quietly and respect the surrounding residents.
- Prohibit outdoor drinking, unless authorised by appropriate licencing.
- Reflect the dispersal policy within the licensing applications.

3. Outdoor dining would be controlled through the licenses, to be only in the areas shown in Bank End and Soap Yard up to 10pm.
4. Security guards on the application site will be SIA accredited. These guards would stop people loitering, ask disruptive visitors to leave, usher smokers towards the dedicated area in Soap Yard. The applicant has set out their intended rota but this would be reviewed after a period of operation. There will be three guards to help manage the deliveries in the mornings, two guards on patrol until 18:30 and minimum of two guards on patrol from 18:30 to 00:30. The bars will be required to have their own SIA accredited security guard, from 21:00 to 00:30 on Thursdays, Fridays and Saturdays, and the applicant will undertake a risk assessment for whether there is the need for guards at other times. The site's CCTV would be monitored 24hrs 7 days a week to look for issues. Each tenant and the security team will assist with the overall site dispersal at the end of each day, asking people to leave quietly. There is an estate manager for the site, with part of the role ensuring the site is safe by working with the security guards to prepare a plan to minimise disturbance in the area, acting as a point of contact for residents, and keeping a complaints record. If multiple complaints are received for one occupier, an action plan will be created.

133. If the minor material amendment application is approved, some of these mitigation measures would be secured in an updated Visitor Management Plan (which would have the Tenants Handbook appended) and updated Site Wide Servicing Management Plan pursuant to planning obligations. Others would be addressed through the licensing conditions instead.

134. The applicant submitted 14 licensing applications for the restaurant and bars uses on the site. The licensing regime is separate to planning controls. It is another form of regulation that the council has in addition to its planning enforcement powers. Licences for the site's restaurants and bars were approved by the Licensing Sub-Committee in June 2021. The licences include several conditions as licensing mitigation measures including: the hours of operation; hours of takeaways; no customers drinking alcohol outside units on the streets; requiring lobbies to the two largest restaurant units; taxi marshalling; management of people at closing time with security staff. If a tenant is found to be not operating the restaurant or bar in accordance with the licence, then the licence can be reviewed with revised conditions put on or revoked. The applicant will set up a residents forum and provide a residents liaison contact to report issues.

135. A noise impact statement was provided as part of the Planning Statement addendum. This is based upon an increase from the 11 restaurants suggested on the indicative drawing to the 14 restaurants and bars now shown. The document reads as more of a review of potential noise issues and how they would be managed through conditions or management procedures, and less of

an assessment. The noise impact statement considers five principal areas of noise impact associated with food and beverage uses:

1. Noise “break-out” from units including general customer conversational noise and amplified music;
2. Noise associated with the use of external areas used ancillary to F&B units (e.g. for outside dining, drinking or smoking);
3. Noise associated with mechanical plant (e.g. kitchen extract systems);
4. Noise associated with servicing activities;
5. Noise associated with general comings and goings (including pedestrian activity and associated vehicle movements, taxis, etc.)

136. Taking each in turn:

1 - The drinking establishment units were indicated to be restaurant use on the indicative drawing, and would have the same opening hours. The applicant concludes the potential noise impact from these A4 units (noise break out) would not give rise to any greater noise impact that considered during the determination of the original application where the noise breakout from the A3 units would have been mitigated through appropriate management and/or engineering controls, as required by licensing conditions.

137. 2 – Three external seating areas are shown for dining and smoking (two in Soap Yard, one on Bank End), and one more area in Clink Yard for smoking. They would not be used for standing drinking. Use of these areas would end at 10pm, as required in the licences.

138. 3 – Conditions on the original permission provide controls and restrictions from plant noise and kitchen extract. These conditions would be carried over to any new permission and would apply to any additional kitchen extract equipment needed for the additional restaurant and bar units.

139. 4 – The applicant estimates the increase from 30% to 45% would result in an additional 8 servicing deliveries per day in a “worst case” scenario, which is a 10% increased compared with the approved scheme. The applicant’s noise assessment considers this to result in a negligible increase in servicing noise. The servicing arrangements on the site would remain the same as approved, and the condition regarding the hours of delivery and servicing would continue to apply on any new decision.

140. 5 – In terms of customer noise, appendix L of the supplementary Planning Statement addendum estimates the additional number of people who would visit the site with the increased proportion of restaurants and drinking establishments. These figures are then compared with the numbers of daily visitors to the area established by surveys undertaken by the Trustees of Borough Market in November 2019 as a baseline. The applicant’s estimates for the total capacity of the restaurants and bars at any one time (based on the fire capacity for customers and staff of the units identified as restaurants and bars) would increase from an estimate of 1,740 people with the approved 30% cap up to an estimated 2,756 with the proposed 45% cap, i.e. an additional 1,016 people at any time. This is likely to be an overestimate of the approved and proposed capacity as the fire capacity is likely to be higher than the number of

covers these businesses will operate at. Assuming full occupation of all these units three times during the day and twice at night, this would result in the following estimates of additional visitors:

Time of day	Total visitors to Borough Market area from a November 2019 survey	Predicted visitors with 30% F&B	Predicted visitors with 45% F&B	Increase between 30% and 45% scenarios (as a percentage of 2019 visitor numbers)
Friday 29 November daytime	90,863	96,083	99,131	3,048 (3.4%)
Friday 29 November evening	16,082	19,562	21,594	2,032 (12.6%)
Saturday 30 November daytime	127,191	132,411	135,459	3,048 (2.4%)

141. These numbers assume that the additional visitors are not making linked trips to visit other parts of the application site or the Borough Market area, although in practice some visitors are likely to go to other shops or attractions. The applicant suggests these conservative assumptions would result in an average additional 339 visitors per hour to the site (as an increase from 580 people per hour to 919 people per hour) due to the increased proportion of restaurants and bars. The additional restaurant and bar capacity represents an increase in hourly numbers of 2-3% during the Friday daytime, and a 13% increase on Friday evenings. No comparison was provided by the applicant for Saturday evening, but this is likely to be of a similar order to the Friday night increase.
142. The applicant's noise impact assessment considers this to equate to a sound level increase from people of 0.1dB on Friday daytime and 0.5dB on Friday evening. As the applicant's transport statement does not predict a material increase in expected taxi movements, the noise consultant concludes that any additional taxi movements should not have any significant additional adverse noise impact. Therefore the applicant concludes that the proposed change to the proportion of restaurants and bars should not give rise to "*any additional, unacceptable adverse noise impact on existing neighbouring dwellings in the vicinity of the site*".
143. When compared with the flexibility allowed by the 2017 permission, officers consider that the change of the maximum cap from 30% to 45% restaurants and bars would not to cause significant additional harm to the amenity of surrounding properties providing the extra mitigation measures are secured, for the following reasons. The reader is reminded that:
- a direct comparison between the approved restaurant and bar units and those now proposed is not possible, a comparison of the new drawing and the indicative plan can be used as a guide for where the additional

restaurant and bar floorspace is proposed.

- the 2017 permission did not restrict the proportion of drinking establishments within the 30% cap.

144. The site and its context are located within a very central part of London (with the associated planning policy designations), and in a mixed use area with rail services between London Bridge and Cannon Street crossing above the site. The objections received from local residents refer to the existing problems and disturbance from people at all times of day, drunken and sometimes violent behaviour that requires regular attendance by the police, and weekly street cleaning. With the application site currently a construction site, its occupation for the approved scheme (office, shops, restaurants, bars, gallery and cinema) will increase the numbers of people in the area, but also add to the surveillance of surrounding streets and estate management/staff monitoring the site. The proposed changes from the indicative drawing are considered for three areas of the site as follows.
145. The restaurant units in a row on Bank End would be opposite a hotel, and close to The Anchor pub and two existing restaurants within the adjacent railway arches (Wagamamas and Nandos). There would be one more restaurant than suggested by the indicative drawing. Licensing controls apply to the use of the outdoor dining area. Subject to closing at midnight and the other conditions of the original permission being carried over, they are considered not to cause additional harm to the amenity of the area.
146. The units within the new Park Street building and two adjacent railway arches would change from the indicated three restaurants, to be two restaurants and a bar in the current scheme. A third current planning application (21/AP/1393) by a different applicant seeks the council's consent pursuant to condition 30 to merge these three units to share toilet facilities, kitchen, staff rooms and storage. The change of one unit from a suggested restaurant on the indicative drawing to a bar, which would be lawfully used as such within the approved scheme and would be subject to the re-imposed planning conditions is not considered to create noise and disturbance that would cause significant harm to the amenity of adjacent and nearby residential properties.
147. The five Stoney Street railway arch units (207, 208, 213, 215 and 219) could each be occupied as a restaurant or bar as approved uses in the original permission. The five units could all be occupied as restaurants along with unit 205 as a bar within the existing 30% floorspace cap on restaurants and bars (at 28.3% of the approved Class A floorspace) and be open until midnight. This could be the applicant's fall back position if the current application is refused and has to be a material consideration in the assessment of the current scheme. When compared with the current construction site that has been vacant for a number of years, the introduction of shops, restaurants and a bar to Stoney Street would bring an increased level of noise and disturbance to the nearby residential units. The two largest units (units 215 and 219) were indicated to be shops in the indicative drawing and would now be restaurants that together could accommodate hundreds of people (according to the licensing figures, maximum capacity for 420). The amount of noise and disturbance from the proposed restaurant and bar uses of these units is considered not to be significantly more harmful when compared with what

might occur from the implemented permission and its flexibility to locate food and beverage uses. The licensing conditions which require the addition of lobbies to units 215 and 219, that the bifold doors be closed (except for access) after 10pm, and no takeaway collections after 10pm would add further non-planning controls to the operation of the restaurants and bars. An additional condition regarding noise levels of amplified and non-amplified music and speech is proposed, which was suggested by the environmental protection team (EPT) as a further planning restriction.

148. Many of the objections received refer to increased anti-social behaviour in the streets around the site when restaurants and bars close. The police have not raised objection to the minor material amendment application on this basis.
149. The suggested revisions to condition 28 would add further restrictions to limit the impact of the changed proportion of restaurants and drinking establishments. The maximum of one bar on Stoney Street is a welcomed additional restriction that was not included on the original permission. The bar unit shown (unit 205) is towards the southern end of the row of arches, furthest from the Stoney Street northern neighbours, and with the smallest frontage which would assist in protecting neighbour amenity. One other drinking establishment is shown in unit 192A at the southern end of the site (which ties in with the third current application to merge units for Barrafinna) that was shown on the indicative plan to be a restaurant. Together these two units take up 4% of the Class A floorspace and so sit well within the suggested 10% maximum cap on drinking establishments. When compared with the potential for the maximum of 30% of the Class A floorspace being used as bars, in any of the retail units, the proposed modifications to condition 28 in terms of drinking establishment use are acceptable in neighbour amenity terms, and would give the council control on any future revisions to the units in drinking establishment use.

Conclusion on neighbour amenity

150. The proposed minor material amendments would not cause impacts to the outlook, privacy, daylight and sunlight of surrounding properties. The additional kitchen equipment to serve the restaurant units would continue to be the subject of re-imposed conditions relating to kitchen extract equipment and plant noise to reduce noise and odour issues. The original permission allowed the applicant a lot of flexibility in the number and location of restaurant and bar units. The likely noise and disturbance from the greater proportion of restaurant and bar use, and potential increase in antisocial behaviour in the surrounding streets has been considered, and found to not result in significant additional harm to the amenity of neighbouring properties to warrant the refusal of the application. EPT had concerns over the increase of A3 and A4 units and potential for additional cumulative impact on residential amenity. Having regard to the premises licences granted with a suite of conditions to address noise and prevention of public nuisance objectives, EPT has suggested an additional planning condition regarding noise levels on any planning permission is needed. This additional condition has been included in the recommendation. The Met Police raise no objection.
151. The proposed revisions to condition 28 are considered to be acceptable in the

context of the character and location of the site and with the benefit of the additional restrictions to be added into a revised condition 28 and additional mitigation measures. The recent licences granted for the restaurant and bars include additional controls beyond those of the planning decisions.

152. The revisions proposed by the minor material amendment application are considered to comply with saved policy 3.2 'Protection of amenity' of the Southwark Plan and Core Strategy policy 13 'High environmental standards' part 8 in particular which refers to avoiding amenity problems. These two policies are those referred to in the reason for condition 28. The proposal is considered to also comply with part v of saved policy 1.7 'Development within town and local centres' of the Southwark Plan that relates to neighbour amenity impacts, and with London Plan policy D14 'Noise'.

Transport and highways

153. London Plan policies on transport seek to ensure developments are integrated with current and planned transport access and capacity, to provide mitigation where necessary and focus on sustainable modes. Core Strategy policy 2 encourages sustainable transport to reduce congestion, traffic and pollution. Southwark Plan saved policies 5.1 "Locating developments", 5.2 "Transport impacts", 5.3 "Walking and cycling", 5.6 "Car parking" and 5.7 "Parking standards for disabled people and the mobility impaired" seek to direct major developments towards transport nodes, provide adequate access, servicing, facilities for pedestrians and cyclists, and to minimise car parking provision while providing adequate parking for disabled people.

Site layout

154. The site layout in terms of its accesses, unit entrances off the surrounding streets and new public routes running north-south and east-west would not change in the proposed amendments. The hours of the access routes closing would be changed to 10pm rather than 11pm as secured in the section 106 agreement as part of the mitigation measures. This is considered acceptable given the existing, public highway routes around the site's perimeters that would provide similar connections after the new routes close at 10pm, while still enhancing the Low Line route through the day and evening.

Trip generation

155. In terms of taxi trips, the applicant's transport note considers the proposed to change to increase the potential number of taxi trips. The Transport Assessment of the 2015 application did not include an estimate of taxi trips as it assumed this was unlikely to be material different from taxi use for Vinopolis. The applicant considers that the additional three restaurant and bar units of the current proposal "*would not necessarily translate into significant numbers of taxis on the streets surrounding the site*" as these visitors often share taxis, and "*in locations where there are multiple restaurants and bars taxis often pick up a new fare shortly or immediately after they have dropped off their previous fare at busy times*" so that these additional visitors would likely hail a taxi that is

already on nearby streets. The applicant concludes the proposal is “*unlikely to result in a material increase in the number of taxis accessing the site and therefore would have no significant effect on the local road network*”.

156. The transport policy team has considered the impact on vehicle movements from the proposed change in Class A uses. Comparison of comparable sites’ travel surveys within TRICS travel database has revealed that it would create net reductions of 12 and 7 two-way vehicle movements in the morning and evening peak hours respectively.
157. The number of taxi movements per day is estimated by officers to rise by 6 two-way movements, equating to an upturn of around 1 taxi every 4 hours in a 12 hour-period, although in practice these may be concentrated more in the evening than throughout the day. Officers consider that this development proposal would not have an adverse impact on the existing vehicular traffic on the adjoining roads. The highways team has no objection to the proposal.

Servicing and deliveries

158. The applicant has provided a note on the potential transport effects from changing the proportion of restaurant and bars. This would result in an estimated 88 deliveries per day, an additional 8 compared with the 80 per day of the approved scheme. The 7 loading bays on the site, open for three hours with an assumed turnaround time of 15 minutes per delivery could accommodate 84 deliveries per day. This assumes that delivery drivers would take the goods to the units. Therefore the predicted number of deliveries would exceed the capacity of the on-site loading bays. However, the applicant is now proposing through the site-wide servicing management strategy (currently under consideration in ref. 21/AP/1580) that instead tenants would have to collect deliveries from the loading bays rather than having the deliveries to their units, which would speed up delivery times and allow more capacity in the loading bays. There is another loading bay designated for refuse collections which would be available for general deliveries when not booked for refuse.
159. The applicant’s consultant also has refined the assumptions of generic trip rates of the original scheme (which assumed each restaurant and drinking unit would generate 4 deliveries irrespective of its precise operation), as four prospective tenants provided more detail on their delivery requirements and average 3.3 deliveries per day. If this is extended across the whole site, and taking account of the suggested merging of units 192, 192A and 193, the predicted number of total deliveries would reduce to 72-80 per day, and would be within the assumed capacity of the on-site bays.
160. The highways team raise no objection to the proposal. The transport policy team has reviewed this information and compared the revised Class A uses with comparable sites’ travel surveys within TRICS travel database. The associated number of deliveries would increase by 7 two-way vehicle movements per day, a lower figure than projected by the applicant’s consultants. Officers estimated number would mean the number of deliveries to the whole development would rise by 4 from the original 80 to 84, which is similar to the 88 predicted by the applicant. The numbers officers have calculated are 4 less than the applicant. Taking account of the additional

research by the applicant with future tenants of the restaurant and bar units, which could result in 78 deliveries per day, and with three units proposing to be merged could reduce this by 2 per day. Officers consider that the proposal would not have any noticeable adverse impact on the adjoining roads as a result of servicing demand. The transport policy team has no objections from the highway and transportation perspectives providing that a DSP deposit is paid to the council of £16,356 (indexed) along with a monitoring fee. This would allow for monitoring of the site once it has been occupied, and for measures to be put in place if the servicing operation of the site are found to not be in accordance with the approved servicing plan and are causing transport issues.

Refuse storage arrangements

161. There would be no change to the approved refuse storage arrangements, which are mainly within the basement of the development, and brought up by a lift for collection from the dedicated loading bay during the conditioned hours for servicing.

Car parking

162. There is no on-site car parking. With the excellent public transport services in the area, this is again considered to be acceptable.

Cycle parking and cycling facilities

163. The long stay cycle parking standards within the London Plan are the same for Class A1 food retail and A2-A5 (of 1 space per 175sqm) which match the draft NSP ratios, while A1 non-food retail has a lower ratio for cycle parking (at 1 space per 250sqm for the first 1,000sqm and then 1 space per 1,000sqm). These are the same ratios as the previous London Plan in place when the original planning permission was granted. The long-stay requirements are broadly the same as for the approved scheme, and with 92 spaces for Class A staff proposed within the basement of the scheme, the revised proposal is considered acceptable.
164. For short stay cycle parking, the standard in the London Plan for Class A2-A5 uses (at 1 space per 20sqm) requires more cycle parking than for Class A1 food or non-food retail. The new London Plan short-stay cycle parking requirements are more onerous than the previous London Plan and the draft New Southwark Plan standards. The applicant has proposed five more Sheffield stands (to give 10 more spaces) within Soap Yard, near to other 114 short-stay cycle parking within the approved scheme. This is considered to be an acceptable contribution for the change in the proportion of retail types, considering the constraints of the site with limited opportunities to include more Sheffield stands. The installation of the additional cycle stands would be conditioned on any new permission.

Other transport and highway topics

165. Reference was made in the objections that the extra vehicles and people

resulting from the proposal would block or hinder access to the blue badge parking bays used by disabled residents. Two bays on Clink Street and one on Park Street are available without time restriction, and the three bays on Stoney Street are available for stays of up to 4 hours. These bays are available for any blue badge user, a visitor, worker or resident. The scale of increase in traffic from the proposal within a busy area with multiple other shops, restaurants, attractions and residential properties on these streets, and when subject to the same highway enforcement regime, is considered not to significantly reduce the access to these blue badge spaces surrounding the site.

166. The off-site highway works secured by the 2017 section 106 agreement would remain as a planning obligation for any revised permission. A section 278 highways agreement has recently been reached with the highway authority. The new public access routes across the site that form part of the Low Line would remain as approved, except that their opening hours would be shorted by one hour from 11pm to 10pm.
167. A travel plan was required by condition 17 of the original permission, and a document has been approved pursuant to part a) of the condition. The requirement in part b) of the condition for a survey of visitors and review of the travel plan measures would continue to apply on any new permission issued.

Environmental matters

168. The reason for condition 28 refers to strategic policy 13 'High environmental standards' of the Core Strategy. This policy contains 10 parts including BREEAM, carbon emissions, waste reduction, minimising water use and addressing flooding by requiring developments to help us live and work in a way that respects the planet's resources, reduces pollution and damage to the environment, and adapt to climate change.

Construction management

169. The increased proportion of restaurant and bar use of the units within the site would not significantly extend the construction programme of the Borough Yards development, nor new raise construction traffic issues compared with those considered in the 2015 application.

Water resources

170. The revisions would not significantly affect the water demand of the site. The BREEAM requirements would continue to apply.

Flood risk

171. The changes to the mix of retail uses across the site do not affect the flooding risk of the site nor the surrounding area.

Sustainable urban drainage

172. There would be no change to the surface water drainage strategy approved pursuant to a condition on the original permission.

Land contamination

173. The changes sought do not change the characteristics of the end users of the site, nor affect the remediation work to be undertaken and the verification of the works undertaken which were required by conditions on the original permission.

Air quality

174. The site is within the air quality management zone and a central area of London near to busy roads (Borough High Street and Southwark Street). Many of the objections refer to the increased traffic from taxis and servicing from having more restaurant and bars on the site, which would impact on air quality.
175. The site benefits from the highest PTAL level of 6b, and has excellent public transport services, including bus, train and Underground services that visitors can use to travel to and from the site. While there may be more taxi use associated with the increased number of restaurants and bars, many private hire taxis are now electric. The applicant, through its Tenants Handbook would require tenants to direct taxis to the Soap Yard end of Stoney Street to try to keep waiting vehicles away from most of the neighbouring residents and the narrowest streets.
176. The servicing hours for the site would remain as per the condition on the original permission. The change from retail shops to more restaurants and bars would not significantly change vehicle numbers travelling to the site to warrant a refusal of the application on air quality grounds.

Wind

177. With no amendments to the external appearance of the site, other than the addition of a gate, the proposal would not change the wind environment in or around the site.

Light pollution

178. The revisions would not significantly increase the lighting levels in and around the site. Details of the external lighting are required to be submitted and approved by the council by condition 33 of the original permission and this requirement would continue to apply.

Energy and sustainability

179. The proposed changes to the mix of uses within the development would not affect the sustainability considerations of the original application in terms of carbon emissions and BREEAM ratings. While there are now additional policy

requirements of the London Plan on zero carbon, whole life-cycle carbon and the circular economy, when the nature of the proposed changes are considered it would not be reasonable to apply these policy requirements to this section 73 application.

Other matters

180. The proposed amendment would not affect the archaeological impacts of the approved scheme.
181. The original application was considered not to be EIA development, and a negative screening opinion was issued in ref. 15/AP/0806. The proposed changes to the development have been considered in a recent screening opinion ref. 21/AP/1998. A screening opinion was issued in June 2021 to confirm that the proposed development is not EIA development.
182. The current minor material amendment application primarily seeks to vary condition 28 of permission ref. 19/AP1649 (itself a minor material amendment to the original permission 15/AP/3066). The recommended wording of a revised condition 28 has been amended from that originally sought by the applicant, in order to refer to a submitted first floor drawing, and to remove reference to specific use classes given the potential for further change to the Use Classes Order. The other conditions from the previous permissions would be carried over to a new decision notice, and their recommended wording has been updated to reflect submissions already made to approve details and the non-material amendments agreed. The approved drawings condition would also be updated to include the new floorplan drawings provided.
183. Other than those paragraphs that require amending to secure the mitigation measures necessary for the proposed revisions (as detailed below), the majority of the section 106 agreement associated with permission ref. 15/AP/3066 would continue to apply. For example, the end use job requirements to ensure new jobs and training opportunities for local people would not be affected by the suggested revisions, so the proposal would remain in accordance with strategic policy 10 of the Core Strategy and in line with the Section 106 and CIL SPD.

Planning obligations (S.106 agreement)

184. The existing s106 agreement was secured with reference to saved policy 2.5 of the Southwark Plan that advises that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal.
185. There have been no other deeds of variation to the March 2017 legal agreement. Many of the obligations have been discharged having had acceptable details and documents submitted, and the on-going requirements in the agreement would continue to apply. Only the obligations of the March 2017 legal agreement that are sought to be amended, or require updating to reflect the necessary mitigation for the minor material amendment application, would be altered.

Planning Obligation	Mitigation	Applicant Position
Notify the council ahead of implementing the new permission	To clarify which permission the applicant is operating within	Agreed
Definition of "Small Enterprises"	To be revised to refer to small and medium sized enterprises that operate 10 or fewer retail outlets within the UK	Agreed
Revised hours of the Access Routes being available to pedestrians and cyclists	To amend Schedule 4, part 2, paragraphs 5 and 6 to refer to 10pm closure and locking of the gates.	Agreed
Revised Site Wide Servicing Management Strategy	To add a requirement in Schedule 5 part 2 to require an amended site-wide servicing management strategy to be submitted and approved (in consultation with TfL and Borough Market) ahead of a permission for ref. 21/AP/0507 being implemented.	Agreed
Payment of a delivery and servicing deposit, and associated monitoring fee	Payment of a financial deposit of £16,356 (indexed) and monitoring fee of £1,600 (indexed).	Agreed
Revised Visitor Management Plan	To add a requirement in Schedule 5 part 3 to require an amended visitor management plan ahead of a permission for ref. 21/AP/0507 being implemented.	Agreed

186. In the event that an agreement has not been completed by 31 December 2021, the committee is asked to authorise the director of planning and growth to refuse permission, if appropriate, for both applications for the following reason:

In the absence of a signed deed of variation there is no mechanism in place to mitigate the adverse impacts of the proposed minor material amendments and variations sought by the applicant, and it would therefore be contrary to saved policies 2.5 Planning Obligations of the Southwark Plan (2007), Strategic Policy 14 Delivery and Implementation of the Core Strategy (2011) Policy DF1 Delivery of the Plan and Planning Obligations of the London Plan (2021) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015 with 2020 addendum).

Mayoral and borough community infrastructure levy (CIL)

187. 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.
188. The 2017 section 106 agreement secured a Crossrail contribution of £1.1m (indexed) and any Mayoral CIL contribution was to be deducted from the Crossrail contribution. The revised floor area and different split of uses across the site may affect the amount of CIL liability in accordance to CIL Regulations Schedule 1 Part 2. This would be calculated in more detail when CIL Additional Information and Assumption of Liability forms are submitted prior to implementation of any new permission. After the new liability notice is issued, CIL abatement request should be submitted by the applicant as per CIL Regulation 74A, in order to credit the £649,133 (paid for permission ref. 15/AP/3066 in August 2017) against the revised liability notice.

Community involvement and engagement

189. The applicant has provided a completed Engagement Summary for the Development Consultation Charter which summarises the meetings held. The applicant engaged in informal pre-application discussion with officers, and with councillors, some residents and Borough Market prior to the February submission. The applicant distributed leaflets to approximately 500 nearby properties. A further community online meeting was held in March where many concerns were raised regarding gates, security guards, noise, opening hours, outdoor drinking, bars on Stoney Street, night time exit strategies, lack of public toilets, the lack of transport mitigation measures particularly for taxi movements, and antisocial behaviour.
190. The council advertised the application by posting neighbour letters, site notices and a newspaper advert. This exceeded the statutory requirements for consulting on a minor material amendment application, and the consultation referenced the separate s106 variation application too. Approximately 100 objections were received in response from local residents, businesses, ward councillors and organisations, which are summarised below. Those who had written in on the planning application were reconsulted by the council in June 2021 in relation to the submitted amendments and additional documents.
191. When considering the amendments to the current application to respond to the objections received, the applicant met with residents, ward councillors and Living Bankside. A leaflet to update local properties on the revisions to the planning applications and to update on the licensing applications was distributed to approximately 500 properties in May 2021.

Consultation responses to the first round of consultation from the ward councillors

Ward Councillors

192. The three ward councillors object to both the s73 application and to the s106 details application.

- This is not a “minor” amendment, and would change the intended character of the development, harm neighbour amenity and harm the operations of Borough Market.
- The views of local councillors, residents and other stakeholders may not have been accurately reflected, and the submission was made prior to a meeting with a wider group of residents who do not support the proposal.
- While Covid has presented some challenges to the retail sector, they do not accept this as a reason for a permanent increase in A3/A4 units to 50% of the retail floorspace.
- Encourage officers and the Committee members to visit the site.

193. Restriction of A3/A4 uses in original application:

- The original redevelopment of this site was “sold” to the local community as an improvement on the previous use, and took into consideration the concerns raised by local residents about the noise and antisocial behaviour associated with the previous use of the site. It was conditioned that no more than 30% of the retail floorspace would be used for A3/A4. A plan was submitted showing the suggested uses for each space, which was all believed to be the actual plans but which turns out to have only been an “indicative” plan, despite being referred to in the officer report as a definite layout. In that plan, the two northernmost units on Stoney St were not designated as A3/A4. Images submitted with the original application also showed at least one restaurant/cafe opening out into Dirty Lane.
- The glazing condition of the permission is not being complied with as windows have not been obscured.

194. Current application:

- The current application wants to increase the amount of floorspace used by A3/A4 (or the equivalent new use class) from 30% to 50%. The applicant has only talked about “indicative” uses, however the plans that have been submitted for the licensing applications show A3/A4 uses all along Stoney St, opening out directly onto the street. All the units along Stoney St are double height, open directly onto the narrowest part of the street and those at the top end are directly opposite residential properties. Unlike the original images that residents were shown by the applicants, no A3/A4 units exit internally into Dirty Lane.
- There has also been a licensing application for A3 use of the gallery, and already been granted for A3/4 use of the ground floor of the cinema. Some licensing applications also include outdoor spaces for dining/drinking, and unit 192a shows a terrace that can only be accessed from within that F&B unit (and which does not have planning permission). While we are aware that the two regimes are separate, we

are including the map which was sent in with the actual licence applications as this cannot be considered to be indicative.



- This plan differs from that which has been submitted with the current planning application. The applicant's table shows the gallery as retail space, and ignores the F&B offer in the cinema.
- It also differs from the illustration that was sent out on the consultation leaflet (and which only talks about ground floor uses when all of these units have upper levels, and only talks about restaurants when we know some will be bars):



- Given the confusion that has been created by the use of “indicative” and “actual” plans in the original consent, in the event that this application is granted in any form, we would want to see a definitive plan this time that sets out the exact locations for each A3/A4 (or new equivalent use class) unit.

195. Large units:

- The permission prevents the merging of units without prior consent from the planning authority due to the “special circumstances of this case” and “to preserve the special and unique character of the area”. Yet the applicant has confirmed units 192a, 192 and 193 are to be merged into a large restaurant with a bar exiting directly onto Park St. Patrons will pass under the windows of multiple residents, no matter which way they head towards their route home. Units 205 and 207 appear to be merged into one. The unique character of the area has not changed, and the proposal should not be approved.

196. Hours of operation:

- The licensing applications are requesting opening hours later than those restricted by planning conditions. The licensing regime must not be used to undermine planning. The applicants must not be allowed to come back in the future to extend the hours of use of these premises. The residential nature and the pattern of the surrounding streets have not changed.

197. Loss of the Vinopolis complex:

- The cinema and gallery were intended as a little compensation for the loss of cultural space with the redevelopment of Vinopolis. The current proposal seeks to change the gallery to another use, with licence application showing it marked as a restaurant, which is strongly objected to.

198. Impact on local residents:

- The area has over 50 bars and restaurants. The addition of another 16 will contribute to the existing issues of anti-social behaviour which impacts on the local residential population (including long-standing residents, a council owned and managed estate and sheltered housing). Even with Covid restrictions the area and its residents have experienced considerable anti-social behaviour. The noise is compounded by the narrow streets and the railway arches, both from the premises when open and people leaving past residential properties. The increased numbers of cabs and private hire vehicles circling streets that are already crowded with people and traffic to a dangerous level.

199. Officer response: The planning policy considerations of having more A3 and A4 use and less A1 shopping, and the impact on local residents are considered in detail in the Assessment above. The amended submission by the applicant which provides a drawing to confirm the location of restaurants and bars, removes the suggested changes to the gallery space, addresses some elements of these objections. The applicant has confirmed that the first floor windows on Stoney Street will be obscured as required by the permission. The applicant has amended its licensing applications to align with the planning permission. There is a separate application by Barrafinna to merge three units

(ref. 21/AP/1393) which will be considered and determined separately.

Consultation responses to the first round of consultation from members of the public, businesses and local groups

200. NB - Many of the objections use the term “F&B” which is short for food and beverage to mean the Class A3 (restaurants and cafes) and A4 (drinking establishment) uses, and this is used below for brevity.
201. Better Bankside: objects.
- Diluting the retail mix of the scheme will be counter to the Low Line’s ambition for a diverse economic mix within railway arches, and the London Plan’s classification of Bankside/London Bridge as a specialist retail destination. There is demand for a more varied retail offer in Bankside, and the original proposal was welcomed as it would help fulfil the local need. There are already many F&B venues in the area. Changing to 50% would skew the diversity of activity, put pressure on the public realm to the detriment of the area’s amenity. F&B will add pressure for al fresco dining and drinking.
 - Significant increase in delivery and servicing compared with retail, in an area where noise and air pollution is intense. A transport assessment and delivery and servicing plan should be submitted. The medieval street pattern is heavily used by pedestrians and vehicles.
 - Object to the loss of the gallery use, which was included to mitigate the loss of Vinopolis and support the wider cultural and visitor offer.
202. Borough Market: objects to both applications.
- The increase in the proportion of F&B would move away from a healthy balance of uses and control, and will impact on the established special character of the Market and the conservation area.
 - The marketing evidence the applicant refers to as demonstrating the difficulty securing interest from retail occupiers has not been made available. Covid and Brexit will have skewed the market, but the amendments are not appropriate or proportionate in these unusual times.
 - Saturation of F&B in the area and increased footfall. The proposal will create an over-supply. F&B can operate as takeaways; fast food is not in keeping with the character of the conservation area.
 - Setting the upper limit on A4 uses at 25% of total retail floorspace is still a significant A4 presence and will create tension with other uses in the area.
 - Increased servicing from F&B.
 - The proposed concentration of these uses on Stoney Street and Park Street will impact on the Market.
 - Customers spilling out onto the street frontage of heavily trafficked streets would be a hazard.
 - The upper limit of drinking establishments on Stoney Street should be lower than three if not zero.
 - The cumulative impact of the current applications on the likely profile of future tenants, and the resulting impact on the character of the surrounding area. Large units being created without permission, and are

more likely to end up with chain occupiers, eroding the character of the area.

- Question whether the changes are materially altering the permission, and needs a more fundamental review of the carefully negotiated principles of the original scheme than a s73 application allows.

203. Borough Market Environs Group: objects to both applications.

- The successive amendments are slowly and incrementally changing to a significant degree the carefully negotiated uses of the original planning permission. They would further dilute the original permission, with cumulative, negative impacts on the scheme and surrounding area.
- The balance of uses and impact on the unique and special character of the area, through an increase in F&B floorspace, dilution of the cultural space, and permitting larger chains to occupy the units. The original mix added to the daytime economy, which the revisions would not.
- The loss of the gallery would further upset the local balance of uses, and along with the change to the definition of independent retailers would fundamentally alter the scheme and its impact on the character of the Market environs. It would not longer contribute to the wider visitor offer, nor bring public benefits or provide a diverse offering.
- The amendments are premature. The last year is not a reasonable period to use to benchmark such significant long-term changes. Other members of the Group have slightly lowered rental rates to achieve high quality tenants, renewing leases and fitting out shops in the last year.
- The negative amenity impact, including the increase in drinking uses to 25% of the site and the effects this will have on residential occupiers and on the public realm (and servicing) in the special area around Borough Market. The use of the Stoney Street and Park Street units for restaurants and drinking establishments are closest to residents. Streets would be crowded by customers and traffic. The servicing strategy should be considered alongside the s73 application.

204. Living Bankside: a solicitor provided an objection on behalf of Living Bankside to both applications.

- Significant irreparable harm to the amenity of approximately 1,000 residents and the world-famous cultural hub of Borough Market.
- The changes are a substantial loss of vision of the original culture and non-chain retail regeneration that was supported by residents.
- This application must be withdrawn. With 13 separate amendments since the permission, a new full planning application is needed, addressing the paucity of information to explain the reasoning behind the changes, provide marketing evidence and other alterations needed.
- The change from retail to night time development requires this Schedule 2 development to be rescreened as EIA development as it would have significantly different environmental impact, e.g. noise, servicing, taxis, inferring it is now EIA development. To not do so would be vulnerable to challenge.
- Lack of mitigation to the additional noise, taxis, servicing from the proposed changes.
- The changes are contrary to the plan agreed between residents and the applicant in the previous permission. This drawing was not conditioned

despite the officer's report and committee resolution, without explanation. The F&B units are those most detrimental to residential amenity and at a higher density.

- Recent changes to Class E would enable the office to be changed to restaurants without permission; the protections of the mixed use development should not be weakened by altering the approved conditions. The licenses applied for suggest the applicant considers the condition restricting hours do not apply to drinking establishments. Soap Yard could become a beer garden for drinkers, and a terrace to unit 192A which are not restricted by planning condition.
- The change to the s106 obligation on the gallery use requires a planning permission for the change of use to allow analysis against policy, marketing information for a gallery or alternative cultural uses. Class E use would allow F&B use of the gallery unit. The loss of cultural use would be of concern to the GLA.
- Severe transport impacts from the increase in F&B.
- Contradictory information and non-compliance with conditions indicate a lack of regard for planning requirements.
- Cumulative incremental changes to the permission have resulted in a fundamental change. Inadequate conditions would allow F&B units to be combined and occupied by large chain businesses. No noise limitation condition was imposed to provide security for residents and allow monitoring of nuisance.
- The change the definition of small and medium enterprises is a further change from that approved and would allow a generic appearance of the development.

205. Peer Group PLC – objects. It owns properties within Southwark including The Hop Exchange, and is a member of the Borough Market Environs Group.

- The proposed fundamental changes go to the heart of the original permission, as a significant change to the nature of the overall development and loss of cultural spaces. The changes are more than minor material in nature.
- The impact on the special character of the surrounding area, through a significant increase in the overall retail offer, dilution of the cultural space through its potential repurposing for retail use, allowing 25% drinking establishments (in an alcohol saturation zone) and permitting larger chains to occupy the units;
- Potential negative longer-term impacts around the Hop Exchange, including the impact on servicing and deliveries and public realm, caused by an increase of traffic. Putting increased strain on the established service routes and public realm in and around the site and Market.

206. United St Saviour's Charity – objects. It owns properties on Park Street and Stoney Street.

- The Borough Market and Cathedral area has a special and unique character made up not only by the historic buildings and street layout, but by the people living and working here who form the fabric of the community.
- The approved scheme was supported, and enhanced the unique character with an attractive, sustainable destination. The current

proposals seek to overturn all the good intentions.

- Objection to the increase in food and beverage as it would harm neighbour amenity, cause antisocial behaviour, traffic, litter and crime. Residents would be overlooked from the unobscured windows. Drinkers would exit onto streets opposite people's homes.
- Object to the consolidation of small units into larger units, which would be occupied by pub chains over two floors for thousands of drinkers.
- Object to loss of the gallery when the area is in high demand for community cultural art gallery type space.
- Covid and Brexit are not good reasons to make the suggested changes as a knee jerk reaction. There is demand from small retailers, which the charity has seen in its own lettings. The applicant should review its own letting priorities instead of profit led decisions that cause permanent harm.
- The charity was not consulted by the applicant.

207. 95 objections received to the first consultation raising the following summarised issues which are grouped into themes:

208. Change from the principles in the approved scheme

- This is not a minor amendment, changing many aspects of the first application and the officer assessment. It is a fundamental change to the uses that goes to the heart of the permission. The council imposed the restriction conditions for good reasons, with no justification for changing it now.
- The local community accepted the 2017 permission with specific restrictions and vision (with its 30% cap on drinking and dining, the vision to preserve and enhance the special character of this area with mostly non-chain fashion retail units, a gallery and cinema to provide local amenities) as it was sensitive to local concern and special character of the area. Retail was to be the core activity of the site. Fundamental to approved scheme were four things: 1) active consultation with community; 2) non-reliance on F&B; 3) a retail mix that was not high-street chains; and 4) contribution to 'culture'. These were all essential for ensuring the development would be "in keeping" with this unique/sensitive/important area and not too disruptive to residents/other businesses/visitors, with a critical servicing management plan, and rental agreements for small independent retailers. It was a policy compliant, sensitive regeneration in the strategic cultural area. Without these conditions there would have been opposition to the first scheme.
- The applicant now seeks to upset the balance, betray the vision, overturn all the key conditions that made the scheme acceptable, and create a party destination. Consultation thrown out the window; F&B becomes the dominant force; retail mix compromised; "culture" abandoned. With no analysis of the impact of all this on servicing demands, local amenity, preservation of unique historic sensitive area. It will destroy the character of this area, offering no more than a faceless series of chain restaurants and pubs for tourists with no benefits to the local community of 1,000 residents would be overwhelmed by late night noise and disturbance.
- The responsibility of getting the balance right between competing demands in a location - historical, cultural, residential, commercial,

security, etc. - is entrusted to the council. The approved predominantly retail purpose would be more in keeping with the remit of Borough Market and would contribute positively to the sustainable development of the area. There is a real danger now that these proposed changes will irreversibly damage the character of this area with a very special history.

- The council should not wish it being transformed from a diverse, vibrant, culturally distinct, community-friendly neighbourhood into just another overcrowded, uncontrolled drinking zone.
- Question if the applicant ever intended or believed in the original mixed-use retail plan, and instead wanted to create a F&B festival all along. Strayed so far from the original intent that it is no longer possible to read the decision as if it relates to the same project.
- The developer took the risk with a retail scheme and it is not for local residents to suffer the harms from the changes for the developer's profit and investment risk.
- While Covid has had a huge impact on so many aspects of commercial life, it should not be part of Covid's legacy that solid long-term planning protocols are abandoned. It is too soon to write off retail. The blight from the change of use would be permanent (15-25 year leases), while the applicant's reasons are only temporary market changes.
- The proposal raises the Agent of Change principle with night time entertainment, noise generating uses and the need for mitigation measures.
- Non-compliance with planning policies on many topics in the development plan, plus raise new policy areas of Agent of Change, air quality, sustainable development, crime, transport.
- A new full application is required. Inadequate information provided to justify the application, no marketing evidence; the application should be withdrawn. The proposal should be screened again under the EIA Regulations given the change to night time uses and additional transport movements will have significantly different environmental impacts to those assessed in 2015.

209. The increase in restaurants and bars

- There is no need for additional restaurants and bars. There are already too many bars, restaurants and takeaway outlets in the area (over 250, the most of any ward in Southwark), another 17 are not needed. This takes it beyond a safe and sustainable balance of different use in this tightly packed urban area (which is a conservation area) and residents are suffering.
- Retail is what the area needs and is under-served in, not F&B.
- This area is already saturated with bars and restaurants and businesses are struggling. Further F&B would further dilute business for existing traders. A number of independent businesses have had to close due to the pandemic. The original intention was to create small independent retail shops in keeping with the special and unique character of the area.
- The community relied on a drawing that showed the location of F&B uses when concluding the approved scheme was on balance acceptable, however it is now clear that the council did not secure this drawing on the permission.
- Harm to local independent traders. Core customers of existing market businesses would likely be put off by the "drinking crowd".

- Chain restaurants will cheapen the area, and isn't the high standard of Borough Market.
- Disappointed with the change to the definition of independent retailers when there are few trading spaces for genuine independent businesses in central London without being pushed out by the larger retailers.
- Inadequate information provided to allow a full analysis, e.g. the floor space, what size units, how conditions would apply, servicing impacts, amenity impacts, conservation impacts, the 17 licensing applications submitted with off-site sales and outdoor drinking making Stoney Street an outdoor bar. The applicant's calculations have not been validated.
- Covid is a convenient excuse for the changes that would never be allowed in normal times.
- Without a planning permission in place, the applicant has applied for 17 licences, from 7.30am to 1.30am, with off sales and outdoor drinking (despite there being no outside space). Business names are not given on the licence applications to allow residents to know the style of hospitality.
- The units have first floor areas so it is not only a ground floor change. The number of customers in the restaurants and bars would outnumber local residents.
- The approved retail use would be silent at night time and not leave rubbish or have noisy groups of customers, unlike the eating and drinking uses.
- Object to consolidating the smaller units to make larger ones. Large units are more likely to be occupied by chain F&B businesses.
- The F&B units would not be subject to the independent retailer requirements.
- To allow more F&B would be inconsistent with the council's previous consideration and decision.
- The permission does not prevent other uses (now in Class E) being turned to restaurants and bars, such as the office. The condition on opening hours would not apply to sui generis drinking establishments.

210. Loss of the gallery and harm to the cultural heritage of the area

- The permission was originally proposed to be a carefully balanced, cultural mixed-use enhancement to the existing residential and business area. This current proposal represents a lost opportunity and undermines the approved scheme.
- Loss of the cultural gallery attraction in a designated strategic cultural area. License application suggests the gallery will become F&B.
- Substantial harm to the built and cultural heritage of this area of London and of Borough Market. Disastrous long term consequences for one of the UK's most important attractions and heritage sites.
- Policies emphasise the importance of "place making", respecting the character of an area and the "built heritage" in the quality of design, efficiency of land-use and attention to servicing. These changes fail against all those standards. This revised project which removes leisure, arts and cultural uses will manifestly not be better quantity and quality than what it replaces.
- The proposal does not comply with the development plan by removing conditions and mitigation, harming place making, removing arts and

culture.

- No planning application has been made for the other uses of the gallery; changing the s106 wording is not sufficient.

211. Harm to residents' amenity

- Harm to the amenity of circa 1,000 residents in the area due to the proximity to adjoining properties, loss of privacy, noise nuisance from thousands of people on the application site units and exits only a few metres away. Allowing 5,000 additional people on site at any one time would add 25,000 drinkers and diners per day on small streets would outnumber the residents. The approved retail would be silent at night.
- There would be thousands more people in the area, 7 days a week, 19 hours a day, with the units hosting thousands of people. It will be similar to the impacts of ten cruise ships arriving each day, and similar to the harm visitors cause to Venice.
- This area is already in a cumulative impact zone, and cannot accommodate anything of the scale the applicant wishes. The proposal for more restaurants on this development and licensing for alcohol up to midnight (or licensing applications for 7am to 1.30am) is not compatible with co-existing in a residential area. The licensing applications already made do not respect the planning conditions.
- Bars and restaurants now being sited on the outer faces of the site, rather than being more contained on the internal Dirty Lane side. The units are very close to residential neighbours, separated by only narrow streets.
- The permission did not secure the drawing showing the location of A3/A4 uses despite this being what residents and the Committee expected.
- The bars and restaurants have large opening French doors that will let the noise escape, and have no outdoor space, so people will use the roads, walkways and sitting in doorways instead. The late night licences now submitted for by the applicants do not have any provision for outdoor space, and at capacity there could be thousands of patrons occupying the small area which would be unsafe given the current climate and push people onto the surrounding streets, causing social nuisances, including but not limited to excessive noise, urination and vomiting.
- The area suffers already from littering, rowdy behaviour and street drinking. Alcohol increases people's volume.
- The only way in and out of the site is past residential properties.
- Noise from people in the streets ebbs and flows continuously which is more upsetting and disruptive than continuous noise. It will affect people's mental and physical health from the stress of sustained noise in the home. No mitigation is proposed to deal with customers once they have left each unit.
- Noise echoes around the narrow streets and would increase with the additional restaurants and bars. Residents have bedrooms that look onto the streets and would not be able to open windows in summer. It is a conservation area and many of the properties have no way of insulating themselves from the noise (with double or triple glazing), so have no choice but to put up with the late night behaviour and more importantly the constant noise of drinking in the streets which will

reverberate from Dirty Lane into the surrounding neighbourhood.

- Off site drinking with people sitting in residents' doorways etc.
- There is no condition restricting use of the outdoor spaces which must be addressed in the new decision.
- Food odours and fumes from the extra F&B being unpleasant for residents, with no details of ducting etc provided.
- Lack of mitigation for the additional impacts. The mitigation measures suggested by residents have not been incorporated by the applicant.
- Children living nearby would hear bad language.
- Residents would have their sleep disturbed.
- The proposal will impact on residents' right to a peaceful existence within their homes.
- Impact on health from the noise and air pollution.
- The neighbouring residential properties are not shown on the applicant's information. Ask that the Committee visit the site to understand the proximity and relationship.
- Comparison with previous Vinopolis use is inappropriate as that was indoors, stood empty most of the time, large areas were storage or offices, and had no antisocial behaviour. Noise from the previous Vinopolis use caused noise levels that were completely unacceptable at times when late licences were granted. It led to loud music and antisocial behaviour, with smashed bottles, singing, shouting and other raucous behaviour in the streets affecting the ability of residents to sleep.
- Residents have put up with 4 years of construction noise, including during lockdown, and had expected the site to be quieter once finished.

212. Antisocial behaviour and major incidents

- Increased antisocial behaviour, particularly with the alcohol related uses. There are already problems with people littering, shouting, fighting, urinating, defecating, vomiting and harassing residents, and increasing the numbers can only make this worse.
- No public toilets are proposed for the hundreds of drinkers and diners.
- Increased crime – pickpocketing and violent crimes.
- Alcohol is a serious problem in Southwark, more than most London boroughs, costing the health service and policing for incidents related to alcohol. Crime is highest in Borough and Bankside wards.
- The applicant's few/two marshals would have no statutory powers to deal with thousands of drinkers in such a large site with 16 exits around its perimeter in 4 streets. The council cannot protect against this "transient noise nuisance", and environmental officers, cleaning services, police, ambulance, fire and NHS will be further burdened. The Vinopolis "shadow licence" included far more protection.
- Increased litter without enough bins. Increased vermin.
- Increased opportunities for crime and disorder with so many people late at night.
- Lack of toilet facilities in the proposal for customers.
- More busking. More smoking on the outside streets.
- No mitigation proposed for these impacts.
- Terrorism is attracted to sites of intensive operation and iconic places.
- Increased risk of fire by more kitchens.

- The human and financial cost of an attack or major incident will fall on the council and emergency services.

213. Transport and highways issues

- Restaurants and bars need more servicing than shops. No provision for the additional servicing needs of so many restaurants and bars on already congested streets which will significantly increase both noise and pollution in the area, affecting local residents. The assessment of the original application was finely balanced in terms of servicing; to have more vehicles should have tipped the balance to a refusal.
- The narrow pavements and streets won't cope with the increased footfall safely.
- The narrow roads won't cope with increased vans and lorries for servicing of the extra restaurants and bars. Roads are regularly blocked by vans, lorries and coaches already.
- Inadequate access and parking provision.
- Increase in traffic passing homes – accident risk and air quality impacts.
- Impact on traffic and highways.
- Harm to the servicing of other businesses in the area that use the same servicing routes and public realm.
- Increased traffic with taxis, Uber drivers, takeaway delivery bikes etc with no provisions for parking or waiting areas, and no restriction on hours they can operate. The historic narrow streets and surrounding areas would be unable to cope with extra footfall and residents would certainly suffer increased noise problems and issues associated with large groups of people leaving premises late at night looking for taxis or transportation. There are no locations where taxis can legally wait so they will keep their engines running. Taxis would circle around this confusing site to find their customers at the different exits, passing residents' windows.
- Additional Uber/Deliveroo Drivers picking up from the restaurants, with no additional access provided, they will have to go past and wait by the current residential areas at all hours of the day, disrupting the lives of the residents.
- Access to the blue badge parking spaces for disabled residents is already difficult with deliveries and taxis blocking the narrow roads. No mitigation is included for residents with disabilities.
- Inadequate public transport. Most has ended by the time the licensing hours end.
- No updated travel plan has been provided.
- No additional cycle parking proposed.

214. Harm to the character of the area

- Out of keeping with special character of area and harmful to the unique, historic and exciting destination from changing the mix of uses (both increasing F&B and reducing cultural use).
- This intensive level of F&B activity will also degrade the unique historic feel of the area, which is part of our local amenity. Because these changes are proposed for a development on this huge scale, the neighbourhood will become unliveable and its unique historic feel is at risk of being obliterated.

- Increasing drinking in an alcohol saturation zone would reduce the currently balanced and diverse offering in the area.
- The joy of the area is its mixed use but these proposals take it into a majority use for a particular kind of entertainment. It is moving more into a night time entertainment development for hen and stag dos rather than retail day time. It would drain the charm, make for a soulless area that tourists won't come to.
- Substantial harm to the heritage of the area, London, and Borough Market. Disastrous consequences for one of the country's most important attractions and heritage sites.
- More F&B will drive away food shoppers from the Market area, as the area becomes a destination for people to drink and eat rather than shop.

215. Scale and overdevelopment

- Development is too high.
- Over development. This is already an over-development which has taken our light, overlooks us and will generate noise and air pollution but now putting more restaurants, more alcohol it will make it incompatible with living cheek by jowl with residents, social housing and Lucy Brown House sheltered accommodation for elderly. This would be over redevelopment on an unprecedented scale which would bring a plethora of issues to a predominantly residential area.

216. Other comments

- Support for the objections made by others, and by Borough Market.
- The proposal is in conflict with local plan and fails to comply with numerous policies of the development plan.
- The mitigation offered of conducting surveys is meaningless and toothless. Offering to lock gates would not mitigate the impact of thousands of people.
- Increase in pollution in an air quality management area. Air pollution is a public health emergency. An air quality assessment is needed given the thousands of extra vehicles the proposal would bring.
- Consideration of climate change is a legal requirement.
- Impact on the mental and physical health of residents, including children, elderly and vulnerable people living at Lucy Brown from the increased antisocial behaviour, noise, traffic and pollution. "The application will significantly affect protected characteristics in a negative way." Approval of the application will be a breach of the council's public sector equality duty.
- Unsafe for the council to approve F&B in narrow, crowded streets with Covid being a known risk, making it liable to action by anyone whose life is harmed by the development.
- Approving it will contribute to a loss of trust in the council.
- Strain on community facilities.
- Affect local ecology.
- Enforcement issues as the obscured glazing has not been installed, and a terrace has been constructed without permission.
- Poor consultation – local residents were missed out, or only contacted by the developer once the planning and licensing applications had been submitted. Leaflets weren't received. The applicant has misrepresented

the feedback given as support. The developers are not community minded, so are not good neighbours so have no trust that they value the great urban mix of the area and the delicate balance between resident and local business needs. The developers have so far failed to be transparent with their plans and hidden their true intentions from neighbours throughout the development.

Objection to the s106 change application ref. 21/AP/0326

217. Some who objected to the s73 application also made reference to the change to the s106 definition on independent retailers, with it diluting the vision of the original scheme, allowing large chains into the site.
218. The ward councillors object to the proposed change to the s106 agreement as follows:
- When this proposal was first given planning permission it had very specific conditions and S106 agreements about the type of premises that would be in the development. It was sold as artisan, independent, small retail units that would complement the existing offer in Borough Market and provide retail shopping opportunities for the local and wider community. This application to change the definition of "independent" to operators with up to 10 outlets does not fit that bill. Moreover, when it is coupled with the accompanying planning application 21/AP/0507 which seeks to decrease the amount of retail uses from 70% down to 50% (or less if you do the calculations differently and include the gallery and the outdoor drinking/dining floorspace as non retail) it would lead to a very different development than one which was first granted permission. We would like the restriction to remain, and ideally for the spaces to be marketed as an opportunity to support Southwark based businesses to develop, at a price they can afford to pay.

Consultation responses from external and statutory consultees

219. Metropolitan Police - do not believe that any of the changes will have a negative impact upon crime and ASB provided that the development is required to achieve SBD certification and the there is continued consultation between the developer and the SE designing out crime team.

Consultation responses from internal consultees

220. Environmental protection team (EPT) – recommend refusal of the condition 28 variation.
- Condition 28 was attached to control the concentration of Class A3 (now class E(b)) & A4 (now Sui Generis) in line with the reasons stated in the committee report for providing a diverse range of retail uses to complement Borough Market, protecting neighbour amenity and the character of the area.
 - EPT do not consider the applicant has adequately addressed the potential negative amenity impacts for the additional restaurant and bar units sought. Such premises attract numerous patrons, late in to the evening. The level of noise and amenity impact from the redevelopment was assessed under 15/AP/3066 and a specified level of restaurants

and bars were agreed upon based on limiting the amenity impacts on existing surrounding residents and occupiers of the surrounding area.

- The request for 50% of the total retail area to be bars and restaurants will mean that there will be nearly double the amount of visitors to this new development for restaurant and bar uses. EPT raise concerns that if this permission is granted, additional disturbance from noise will be caused to present and future occupiers of the surrounding area as well as loss of amenity.
- EPT have concerns that the proposal will likely cause increased noise disturbance and therefore does not comply with saved policy 3.2.

221. Highways development management – has no objection.

222. Local economy team – has no objection to the variation of condition or amendment to the definition of cultural space.

223. Transport policy – comments incorporated into the Transport and Highways topic section above regarding taxi and servicing numbers.

Reconsultation

Reconsultation responses from the ward councillors

224. Ward councillors maintain their objection:

- Despite the conditions agreed by the applicant at the licensing sub-committee, we still have concerns about the proposal to increase the percentage of F&B units. We do not think that amending from 50% to 45% sufficiently answers our concerns. We understand that the retail market may have changed, either temporarily or permanently, as a result of the Covid pandemic and we have some sympathy with the applicants on that. However, the impact on the amenity of the existing residential community, and on the operational ability of existing businesses – which was the reason the F&B floorspace was originally restricted to 30% - remains largely the same. In fact, there has been an increase in residential buildings in Stoney St since the first permission.
- It is also regrettable that all of the F&B units proposed face outwards onto the streets, rather than inwards into the development, and include the largest units.

Reconsultation responses from members of the public, businesses and local groups

225. Better Bankside – continues to object to both applications.

- Incremental amendments to the permission are eroding the vision for Borough Yards being retail-led with a unique and special offer to complement the wider mix around the Market.
- There is demand for a more varied retail offer in Bankside.
- Concerns about the pressures that further drinking establishments will place on the public realm and street network. The servicing note shows the development's servicing capacity does not meet the projected

number, and does not consider the likely impact of taxis.

- Welcome the removal of the gallery change from the submission.

226. Borough Market – continues to object.

- The changes do not go far enough to address the objections to the first consultation.
- The percentage change is still a significant change to the nature of the approved development.
- Safety concerns about the location of drinking uses on the streets.
- Servicing and deliveries – the applicant's own numbers confirms the additional servicing trips per day that cannot be accommodated in the service yard.

227. Borough Market Environs Group – continues to object to both applications.

- The changes are not adequate to address the objections to the first consultation regarding the harm to the balance of uses and impact on the unique and special character of the area, dilution of the cultural space, allowing larger chains, and the negative amenity impacts.
- The revision to the percentage of F&B is minimal, and still represents a significant change to the balance of uses and nature of the approved development.
- Impact on air quality, noise and visual amenity (e.g. from plant).
- Welcome the reduction on proportion of drinking establishments to 10% and addition of a gate, but remain concerned at their locations with the resulting impact on residential amenity.
- Servicing and deliveries – the applicant's own numbers confirms the additional servicing trips per day that cannot be accommodated in the service yard.
- Incremental erosion of the original permission.

228. Southwark Cathedral – objects.

- Write both in capacity as a neighbour of the development and as the parish church; the residents are our parishioners.
- The new offer made by the developers of Borough Yards still represents just too much F&B in an already saturated area.
- The offer of 45% dining and drinking would entail extra servicing, waste, noisier and longer occupation, greater congestion of highways from taxis and Ubers, more smokers and more late-night disturbance, none of which has been sufficiently mitigated.
- Units 215, 219 are too big (14,000 square feet combined) and too close to too many residents for F&B; 192A is too close to too many residents for a bar. At least one unit on Bank End should be reserved for the retail recovery (suggest 232).
- Retail is badly needed here, and the huge footfall means that retail would work if retailers were given enough 'comfort' to come in.
- Disappointed that there is no revision offered regarding the redefinition of small enterprise from three to ten outlets, which would harm the special and unique character of the area. In any case, it appears that at least one of chains in question may already have more than ten outlets.

229. The Peer Group PLC – continues to object.

- The additional significant share of food and beverage is not an appropriate and balanced mix of uses that the approved scheme had. It will be an overprovision and a significant, fundamental change to the permission. Marketing evidence will have been skewed by the pandemic and unlikely to represent reliable data on which to base a long term strategy.
- Welcomes the 10% restriction on drinking establishments.
- The transport note provided does not consider the relevant issues or that concerns have been addressed. Additional servicing traffic will harm the surrounding area. The lower trip rates from examples of operators cannot be guaranteed, and will change over time. Taxi trips are not addressed adequately.
- The amendments are fundamental changes to the permission, question whether the s73 process is the correct way with the council needing to take care to avoid the risk of judicial review.

230. 48 objections maintaining the earlier objections to both the minor material amendments and the revision to the s106 definition:

The revisions made are not sufficient

- The revisions are still too much F&B in a saturated area (as shown by the applicant's drawing), cumulative impact area, and a conservation area that is primarily residential. They do not allay fears that the intensification of F&B is unsustainable with increased servicing, disturbance to residents and highway congestion, as well as the erosion of the unique and special character of the area and commodification of the public realm for drinkers, diners and smokers.
- The offer of 45% dining and drinking would entail extra servicing, waste, noisier and longer occupation, more highway congestion from taxis and Ubers, more smokers and more late-night disturbance, urination etc, none of which has been accurately detailed or sufficiently mitigated.
- The proposal undoes changes that were required by the GLA in the original application to comply with the London Plan for cultural offer, deliveries and servicing compromising the public realm (privatised for diners, drinkers and smokers in areas that were previously open), independent and affordable retail that was considered to reinforce the distinctive retail character of the Market area.
- Disappointed that there is no revision to the redefinition of small enterprise from three to ten outlets, which would harm the special and unique character of the area. It appears that at least one of chains in question may already have more than ten outlets.

Loss of shops

- Retail is badly needed here, and the huge footfall means that retail would work if retailers were given enough 'comfort' to come in. The applicant should think of other ways to attract them. Approving the loss of shops would redefine the area for a generation.
- Covid does not justify ignoring all planning policies. It is far too early to make fundamental, long-term planning changes based on the applicant's change of heart.
- Short-term changes to retail are being used to justify a permanent change to F&B in an inconsiderate scheme that would generations to

redeem. The applicant's documents on leasing and the applicant's original tenant mix aspiration are not accurate. A wellness centre was considered unsuitable, even though residents had asked for it. Suggest that there is not active marketing of the site for leases other than F&B.

- At least one unit on Bank End should be reserved for the retail recovery (suggest unit 232).

Harm to residents' amenity, and anti-social behaviour

- The revision of only 5% is slight, and still includes the largest units as F&B holding hundreds of people closest to the largest density of residents (units 215 and 219) and so will cause the most harm. Increased noise from voices, lingering under windows, chatting, obscene language near to children's homes, shouting, fighting, urination etc until after midnight. Transient noise, outdoor parties and music.
- Noise and smoke from outdoor drinkers and smokers (in the defined areas and the streets), which wouldn't have happened with shops. Unpleasant and unhealthy. Smokers will walk up and back down Stoney Street, will stand in doorways if its raining.
- The proposed mitigation is welcomed but insufficient. A gate won't prevent the units opening straight onto the street. Up to 1574 drinkers and diners could use the site at any one time, five times a day, plus those from the cinema who will be focused on the tiny streets under the windows of 900+ residents. The applicant's figures show 34% more drinkers and diners to the area at peak times.
- No technical noise assessment has been provided and no mitigation has been proposed for the F&B uses. The applicant's noise impact report is inadequate, partisan and misleading, and should be treated as invalid. No sound testing was undertaken from residents' homes. The noise expert and the licensing committee under-estimated the impacts.
- Units 215, 219 are too big (14,000 square feet combined) and too close to too many residents for F&B, on people's doorsteps.
- Units opening onto Dirty Lane in the centre of the site and away from residents would be better for F&B use, with no explanation given on why aside from size.
- The hybrid bar/restaurant licensed on Stoney Street will have the same impacts as a bar use. None should be allowed in Stoney Street.
- The 26 licensing conditions should be included in new planning applications (e.g. requiring double lobbies for noise containment).
- The plan on the original application was expected to be conditioned and had been developed after input from officers, residents and the applicant. It was supported because it showed units 215 and 219 to not be F&B.
- Residents cannot relocate their bedrooms away from noisy facades, nor keep windows closed all the time.
- Three security guards are not sufficient to prevent antisocial behaviour for this huge site with a large perimeter. Dispersal is toothless, especially with a mass exodus at the end of the night. Moving troublemakers off the site puts them onto the streets.
- It is not appropriate to compare numbers of covers or drinkers with Vinopolis.
- The suggested condition drawing should not be conditioned, as it would enshrine the massive unwelcome F&B presence for the life of the

scheme.

- Question the calculations of F&B activity, and the sqm used for the calculations. Cinema drinkers are still drinkers.
- Residents are moving away because of the Borough Yards proposal. Council tenants do not have that option.
- How “upmarket” an F&B occupier is doesn’t give reassurance.

Harm to the character of the area

- A retail mix that is interesting and diverse is needed. Permission was given on the basis of the development being a genuinely mixed retail/F&B scheme, with conditions designed to ensure that the retail and F&B offering would be individual, boutique and in keeping with the character of the area. The current proposals seek to change the nature of the scheme to one which focuses on F&B, and weakens the control on the nature of the outlets that are permitted to operate. This will be to the detriment of the environment, the residents and the character of the area.
- It will destroy the neighbourhood and create a shopping mall.
- Large chains would erode the special character of the area.
- The applicant didn’t make any effort to tailor its needs in the licensing hearing, e.g. all the units would be able to sell bottles for off premises consumption, all will be able to sell takeaway. The applicant has lost its supposedly clear vision about what a massive mixed-use development looks like so it’s going to fill the place with restaurants and bars. That is not a creative vision for what to do here. If we fill this development with F&B we will never know what the mixed-use potential of this space could be.

Transport and highways issues

- Use of the two largest units and the increased numbers of people and servicing vehicles could block access to the two disabled parking bays. Residents have difficulty arranging parking for contractors, moving vehicles etc from the council, yet servicing vehicles are allowed to clog up the roads; this will only get worse with more F&B.
- No mention of additional refuse from the F&B. The hours of deliveries and servicing should be moved later to protect resident amenity.
- A space for taxis is needed to accommodate the additional numbers.
- The submitted servicing strategy states that servicing vehicles arriving outside the site’s own servicing yard hours would be directed to Bank End, which is already used by other businesses’ deliveries causing distress, blocking the street, and access to garages. The strategy says that the office deliveries are not restricted and can be done any time on Park Street. Any new decision needs to define and restrict servicing.
- The largest F&B units will require more servicing.
- Taxi marshals are needed. The issue of taxis was not resolved by licensing. Taxis will be a popular transport option according to the applicant, on a site with no legal taxi parking. It would not be practical for hundreds of taxis to find their customers at midnight. Taxis will compete for space with Borough Market’s large lorries. The tube is closed by midnight with the night services not due to resume until at least 2022. The applicant suggests visitors would hail a black cab, but ignores the cost and shows a lack of understanding of the area’s one way streets

etc. Disabled residents need constant access to the disabled parking spaces.

- Impact on emergency access, fire risk of timber buildings in narrow streets. The applicant's fire and disaster recovery plans are blank.

Other

- The wording of condition 28 needs to allow for community involvement in any changes, not agreed solely with the council.
- Concern that licenses will be varied over time. The conditions should be attached to the physical buildings through planning too. Suggest that the licensing conditions be replicated on any planning decisions where relevant to planning. Plus additional conditions that units 215 and 219 be kept as shops, no queuing or street furniture be placed in the street or footpaths; identify where the taxi collection, waiting and drop off positions will be, away from residents; external lighting switched off at 10pm; no floodlights or flashing lights that can be seen from outside; limit music levels and to never be audible within homes (even with F&B windows/doors open); no set up/dismantling of event equipment after midnight; resident contact to a real person; no keys to be given to suppliers; no noisy cleaning between 10pm and 8am; no singing or shouting in the street outside premises; no heaters awnings or parasols to encourage patrons to linger; non-compliance with the Tenants Handbook be grounds for eviction; provision of public toilets on site; no filming, photography or special events after closing time.
- Question where the EIA screening opinion is. The proposal should be positively screened as EIA development.
- Support the letter by Richard Buxton solicitors and the representations of Better Bankside, the Borough Market and the Borough Market Environs Group.

Reconsultation responses from external and statutory consultees

231. Met Police – The SE Designing Out Crime Unit do not have any comments to make at present with regards to security and Secured By Design measures. The security standards and requirements previously discussed and agreed with the development team for this project will also stand for this amendment. Has passed the minor material amendment application to the council's Licensing Team to see if they wish to comment either directly themselves or via the Met Police.

Reconsultation responses from internal consultees

232. EPT – continues to have concerns over the increase of A3 and A4 units and the potential for additional cumulative impact on residential amenity. EPT has regard of the premises licence applications, submitted under the Licensing Act 2003, that were recently granted at a licensing sub-committee; the applications were granted with a suite of conditions attached to the units addressing the noise and prevention of public nuisance licensing objective. Having regard for the existing planning conditions and the premises licence conditions, concern is raised to there being no planning condition to address sound insulation/potential noise break out. If the planning division is minded to grant

approval for this minor material amendment, and continuing to have regard for the special circumstances of this case, EPT would request a condition be attached to ensure that operational noise from within the units will not cause a loss of amenity to the closest noise sensitive residents.

233. Local economy team – has no objection.

Community impact and equalities assessment

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

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

236. 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.

237. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. The proposed changes to the proportion of retail uses and eligibility of small enterprises within the recently redeveloped scheme would not cause a fundamental inconsistency with the PSED. The equalities concern raised by objectors of impacts upon those with disabilities (a protected characteristic) has been considered, with officers concluding there is no expected effect to suggest that those with disabilities would be further impacted by the proposal with continued normal highway enforcement in place. The equalities concerns raised in the objections regarding the impact on children

and the elderly, particularly those who live in the area, was also considered with age being another protected characteristic. Officers conclude that the proposal as recommended for approval would not impact more upon those with protected characteristics that live, work and visit in the area. The proposal would not contribute to the discrimination, harassment, victimisation or any other conduct that is prohibited by or under this Act.

Human rights implications

238. 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.
239. This application has the legitimate aim of seeking to vary a condition and make changes to the original section 106 legal agreement in relation to a retail-led development which is under construction. 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

240. The council has published its development plan 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.
241. 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 submissions that are in accordance with the application requirements.

Positive and proactive engagement: summary table

Was the pre-application service used for this application?	No
If the pre-application service was used for this application, was the advice given followed?	Yes
Was the application validated promptly?	Yes
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	Yes
To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date?	No

CONCLUSION

242. The assessment of the section 73 minor material amendment application has focused on the changes proposed by the amendment to condition 28, and has not revisited the principles on which the original permission was determined and granted. The site is within the CAZ, an Opportunity Area and town centre where a mix of retail uses are encouraged by policies, as well as support in the recently adopted London Plan for adapting and diversifying town centres CAZ retail clusters in response to the wider trends affecting retail across London, even before the pandemic.
243. The proposed variation of condition 28 to allow a greater proportion of restaurant and bar use within the approved Class A retail units of the Borough Yards redevelopment is considered to accord with development plan policies, in terms of the impacts upon amenity and the environmental (the reasons given in the condition) as well as the town centre uses, design, heritage and transport aspects. Subject to the following points, the minor material amendment application to vary condition 28 is recommended for approval:
- the additional mitigation measures proposed by the applicant being secured through the revised condition and a deed of variation;
 - carrying over other conditions of the original permission, and adding new conditions; and
 - the GLA confirming it does not wish to call the application in for its own determination.
244. The changes to the 2017 section 106 agreement's definition of Small Enterprises would allow larger businesses to occupy the Class A units. The applicant has provided regular marketing reports to the council and has had little interest from shop tenants in the last year, which would affect the phased opening of this nearly-completed development. The cap of an eligible business having 10 other stores is considered an acceptable level that would keep them at a relatively small scale and prevent the large chains from moving into 60% of the site's retail space. The deed of variation would also secure the additional and revised mitigation measures. The second application is also recommended for approval, to be captured in a deed of variation.

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 1412 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 1412 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Copy of the ground and first floor plans to be referenced in the revised condition
Appendix 3	Planning history of the site
Appendix 4	Relevant planning policy and material considerations
Appendix 5	Consultation undertaken
Appendix 6	Consultation responses received.

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Victoria Crosby, Team Leader	
Version	Final	
Dated	6 July 2021	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		7 th July 2021

Appendix 1: Recommendation

Recommendation for 21/AP/0507

This document shows the case officer's recommended decision for the application referred to below.

This document is not a decision notice for this application.

Applicant	c/o Agent MB Bermondsey (Guernsey) Ltd	Reg. Number	21/AP/0507
Application Type	S.73 Vary/Remove Conds/Minor Alterations		
Recommendation	AGREE variation		

Draft of Decision Notice

the variation is **AGREED (subject to completion of a legal agreement)** for the following development:

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.

1 Bank End (Site Including Railway Arches And Thames House Bounded By Stoney Street Clink Street And Park Street) SE1.

Time limit for implementing this permission and the approved plans

1. The development hereby permitted should be begun no later than 24/03/2020.

Reason:

As required by Section 73 and 91 of the Town and Country Planning Act 1990 as amended.

2. APPROVED DRAWINGS

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

1405 SS P 00 0S 01 01 rev P5 Proposed Site Location Plan
 SS P 20 B1 01 01 P6 Proposed Basement Floor Plan
 1405-SS-20-0G-01-01-P_13 Proposed Ground Floor Plan
 1405-SS-20-01-01-01-P_10 Proposed First Floor Plan
 1405-SP-20-02-01-01 rev P6 Proposed Second Floor Plan
 1405-SP-20-03-01-01 rev P6 Proposed Third Floor Plan
 1405-SP-20-04-01-01 rev P6 Proposed Fourth Floor Plan
 SS P 20 05 01 01 rev P6 Proposed Fifth Floor Plan
 SS P 20 OR 01 01 rev P5 Proposed Roof Plan

SS P 21 MF 01 02 P2 Building 2 Facade Study 06
 SS P 21 MF 01 04 P2 Building 2 Facade Study 01
 SS P 21 MF 01 05 P2 Building 2 Facade Study 02
 SS P 21 MF 01 06 P1 Building 2 Facade Study 04
 SS P 21 MF 01 07 P1 Building 2 Facade Study 03
 SS P 21 MF 01 08 P1 Building 2 Facade Study 05
 SS P 21 MF 01 09 P1 Building 2 Facade Study Axonometric Long Elevation

1405 SS P 25 MF 01 01 rev P6 Proposed Elevation 01 Park St - South West (Thames House)
 1405-SS-P-25-MF-01-02 rev P6 Proposed Elevation 02 Stoney Street - East

SS P 25 MF 01 04 P2 Proposed Elevation 04 - Bank End - West
 1405-SS-P-25-MF-01-05-P_7 Proposed Elevation 05 - West
 1405-SS-P-25-MF-01-06 rev P8 Proposed Elevation 06 - East (Internal Courtyard)
 SS P 25 MF 01 07 P4 Proposed Elevation 07
 SS P 26 MF 01 01 P4 Proposed Section 01
 1405 SS P 26 MF 01 02 rev P6 Proposed Section 02
 SS P 26 MF 01 03 P5 Proposed Section 03
 SS P 26 MF 01 05 P5 Proposed Section 5 - Building 1 and 28 Park Street Building
 SS P 26 MF 01 07 P2 Proposed Section 07

Reason:

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

Permission is subject to the following Compliance Condition(s)

3. SURFACE WATER DRAINAGE

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, no below grade works shall commence until suitably developed details of a surface water drainage

strategy, incorporating sustainable drainage principles, that seeks to achieve a reduction in surface water run-off rates from the site to greenfield runoff rates during a 1% Annual Exceedance Probability (AEP) event has been submitted to (2 copies) and approved in writing by Local Planning Authority. The site drainage must be constructed to the approved details.

Reason:

To minimise the potential for the site to contribute to surface water flooding in accordance with saved policy 3.9 Water of the Southwark Plan, Strategic policy 13 of the Core Strategy (2011) and guidance in the Sustainable Design and Construction SPD (2009).

4. CONTAMINATION

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019,

- a) Prior to the commencement of any development, a site investigation and risk assessment shall be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The phase 1 site investigation (desk study, site categorisation; sampling strategy etc.) shall be submitted to the Local Planning Authority for approval before the commencement of any intrusive investigations. The subsequent Phase 2 site investigation and risk assessment shall be conducted in accordance with any approved scheme and submitted to the Local Planning Authority for approval prior to the commencement of any remediation that might be required.
- b) In the event that contamination is present, a detailed remediation strategy to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment shall be prepared and submitted to the Local Planning Authority for approval in writing. The scheme shall ensure that the site would not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority shall be given two weeks written notification of commencement of the remediation scheme works.
- c) Following the completion of the measures identified in the approved remediation strategy, a verification report providing evidence that all work required by the remediation strategy has been completed shall be submitted to and approved in writing by the Local Planning Authority.
- d) In the event that contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-c above.

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters,

property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with saved policy 3.2 'Protection of amenity' of the Southwark Plan (2007), strategic policy 13 'High environmental standards' of the Core Strategy (2011) and the National Planning Policy Framework 2019.

5. SITE INVESTIGATION AND VERIFICATION

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to, and approved in writing by, the Local Planning Authority:

- 1) a site investigation scheme, based on the submitted geo-environmental desk study document to provide information for a detailed assessment of the risk to all receptors which may be affected, including those off site;
- 2) the results of the site investigation and detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken;
- 3) a verification plan providing details of the data which will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the Local Planning Authority.

The scheme shall be implemented as approved.

Reason:

For the protection of controlled waters. The site is located over a Secondary Aquifer, and it is understood that the site may be affected by historic contamination.

6. ARCHAEOLOGICAL BUILDING RECORDING

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, before any work, including demolition, hereby authorised begins, the applicant or successors in title shall secured the implementation of a programme of archaeological building recording in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

In order that the archaeological operations are undertaken to a suitable standard as to the details of the programme of works for the archaeological building recording in accordance with PPS5, Strategic Policy 12 - Design and

Conservation of The Core Strategy 2011 and Saved Policy 3.19 Archaeology of the Southwark Plan 2007.

7. WRITTEN SCHEME OF INVESTIGATION

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, before any work hereby authorised begins, excluding demolition, the applicant shall secure the implementation of a programme of archaeological mitigation works in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

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

8. BREEAM

(a) Unless already approved under 15/AP/3066 dated 24/03/2017 or 19/AP/1649 dated 2/10/2019, before any fit out works to the commercial premises hereby authorised begins, an independently verified BREEAM report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum 'very good' rating for the railway arches and 'excellent' rating for the new offices and retail shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given;

(b) Within six months of first occupation of the railway arches, and within six months of first occupation of the new offices and retail, a certified Post Construction Review (or other verification process agreed with the Local Planning Authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed standards at (a) have been met for the relevant part of the development.

Reason:

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

9. MATERIAL SAMPLES

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, samples of all external facing materials to be used in the carrying out of this permission shall be presented on site the Local Planning Authority and approved in writing before any above grade work hereby authorised begins; the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with Policies: 3.11 Efficient use of land; 3.12 Quality in Design; 3.13 Urban Design; 3.15 Conservation of the historic environment; 3.16 Conservation areas; and 3.18 Setting of listed buildings, conservation areas and world heritage sites of The Southwark Plan (UDP) July 2007 and SP12 Design and Conservation of the Core Strategy 2011.

10. SECURITY MEASURES

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, before any above grade work hereby authorised begins, details of security measures shall be submitted and approved in writing by the Local Planning Authority and any such security measures shall be implemented prior to occupation in accordance with the approved details which shall seek to achieve the 'Secured by Design' accreditation award from the Metropolitan Police.

Reason;

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

11. CYCLE STORAGE

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, before any above grade work hereby authorised begins details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of staff and visitor cycles shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the cycle parking facilities provided shall be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

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

12. BAY STUDY DRAWINGS

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, notwithstanding the details on

the drawings hereby approved, revised bay study drawings at a scale of 1:20 of the Stoney Street railway arches showing the retention of the following elements: loading bays, hoists, arched windows, and piers with bullnose brickwork, shall be submitted to and approved by the Local Planning Authority in writing before any work in connection with this permission is commenced; the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied that the development would make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with Policies: 3.11 Efficient use of land; 3.12 Quality in Design; 3.13 Urban Design; 3.15 Conservation of the historic environment; 3.16 Conservation areas; and 3.18 Setting of listed buildings, conservation areas and world heritage sites of The Southwark Plan (UDP) July 2007 and SP12 Design and Conservation of the Core Strategy 2011.

13. SHOPFRONTS

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, a shopfront strategy, including drawings at a scale of 1:20, for the future design of all shop fronts to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority in writing before any above grade work hereby authorised begins; the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with Policies: 3.11 Efficient use of land; 3.12 Quality in Design; 3.13 Urban Design; 3.15 Conservation of the historic environment; 3.16 Conservation areas; and 3.18 Setting of listed buildings, conservation areas and world heritage sites of The Southwark Plan (UDP) July 2007 and SP12 Design and Conservation of the Core Strategy 2011.

14. DETAILED DRAWINGS

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, bay study drawings at a scale of 1:20 through each facade type across the proposed development and section detail-drawings at a scale of 1:5 through:

- a) the facades;
- b) parapets and roof edges;
- c) roof structures,
- d) heads, cills and jambs of all openings, and
- e) the reduced scale and extent of brick motif street names.

to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority in writing before any above grade work hereby authorised begins; the development shall not be carried out otherwise than in accordance with any such approval given. This applies to

new buildings, the refurbishment of the Thames House facades and the alterations to the railway arches/viaduct

Reason:

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with Policies: 3.11 Efficient use of land; 3.12 Quality in Design; 3.13 Urban Design; 3.15 Conservation of the historic environment; 3.16 Conservation areas; and 3.18 Setting of listed buildings, conservation areas and world heritage sites of The Southwark Plan (UDP) July 2007 and SP12 Design and Conservation of the Core Strategy 2011.

15. GREEN ROOFS AND WALLS

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, before any above grade work hereby authorised begins, details (including a specification and maintenance plan) of the green roofs and green walls to be used 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 otherwise than in accordance with any such approval given, and the green roofs and green walls and are to be retained for the duration of the use.

Reason:

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff, it in accordance with The National Planning Policy Framework 2019, Strategic Policy 11 Open spaces and wildlife, 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; 3.12 Quality in Design, 3.13 Urban design and 3.28 Biodiversity of the Southwark Plan 2007.

16. LANDSCAPING

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme, including tree planting, 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 and material samples of hard landscaping), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use. The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the same size and species in the first suitable planting season. Planting shall comply to

BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason:

So that the Council may be satisfied with the details of the landscaping scheme in accordance with The National Planning Policy Framework 2019 Parts 7, 8, 11 & 12 and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards, and Saved Policies of The Southwark Plan 2007: Policy 3.2 Protection of amenity; Policy 3.12 Quality in Design; Policy 3.13 Urban Design and Policy 3.28 Biodiversity.

17. TRAVEL PLAN

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019;

a) Before the first occupation of the building hereby permitted commences the applicant shall submit in writing and obtain the written approval of the Local Planning Authority to a Travel Plan setting out the proposed measures to be taken to encourage the use of modes of transport other than the car by all users of the building, including staff and visitors.

b) At the start of the second year of operation of the approved Travel Plan a detailed survey showing the methods of transport used by all those users of the building 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 Local Planning Authority and the development shall not be carried out otherwise 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 2019, 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.

18. REFUSE STORAGE

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, before the proposed use hereby permitted begins details of the arrangements for the storing of commercial refuse shall be submitted to and approved in writing by the Local Planning Authority and the facilities approved shall be provided and made available for use by the occupiers of the commercial units and the facilities shall thereafter be retained and shall not be used or the space used for any other purpose.

Reason:

To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and

potential vermin/pest nuisance in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and Policy 3.7 Waste Reduction of The Southwark Plan 2007.

19. FLOOD WARNING AND EVACUATION PLAN

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, prior to the commencement of any use, a flood warning and evacuation plan shall be submitted and approved setting out notification measures, warnings, directional signs etc to be followed in the event of any localised flooding. Once approved, the measures shall remain for as long as the development is occupied.

Reason:

To ensure that the development is designed to ensure safety of the building users during extreme flood events, to mitigate residual flood risk and ensure safety of the future occupants of the proposed development and to provide safe refuge and ensure safety of the future occupants of the proposed development in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy Saved Policy 3.9 Water of the Southwark Plan 2007.

20. BIRDS AND BAT BOXES

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, details of bird and bat nesting bricks shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the use hereby granted permission.

No less than 2 nesting bricks shall be provided and the details shall include the exact location, specification and design of the habitats. The boxes / bricks shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

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

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

Reason:

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

21. KITCHEN EXTRACT

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, all kitchen extract systems shall meet the standard required by DEFA Guidance on the control of odour and noise from commercial kitchen exhaust systems (2011). Prior to the commencement of use of any commercial unit where food will be prepared, full particulars and details of a scheme for the ventilation of the kitchen to an appropriate outlet level, including details of sound attenuation for any necessary plant, filtration systems and the standard of dilution of exhaust air expected, has been submitted to and approved by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any approval given.

Reason:

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

22. VERIFICATION REPORT

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing by, the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a plan (a 'long-term monitoring and maintenance plan') for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the Local Planning Authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

Reason:

Should remediation be deemed necessary, the applicant should demonstrate that any remedial measures have been undertaken as agreed and the environmental risks have been satisfactorily managed so that the site is deemed suitable for use.

23. NO CPZ PARKING PERMITS

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

Reason:

To ensure compliance with Strategic Policy 2 - Sustainable Transport of the

Core Strategy 2011 and saved policy 5.2 Transport Impacts of the Southwark Plan 2007.

24. DELIVERY AND SERVICING HOURS

Any deliveries, unloading and loading to the commercial units shall only be between the following hours: Monday to Saturday - 07:00 - 10:00, Sundays/ Bank Holidays - 08:00 - 10:00 hours.

Reason:

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

25. OPENING HOURS

- a) The Class A3 and A4 uses hereby permitted shall not be carried on outside of the hours 08:00 to midnight on any day.
- b) The gallery and cinema (Class D2) shall not be carried on outside the hours of 08:00 to midnight on any day.

Reason:

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

26. OBSCURE GLAZING

The Stoney Street railway arches on the first floor elevation shall be obscure glazed and fixed shut and shall not be replaced or repaired otherwise than with obscure glazing.

Reason:

In order to protect the privacy and amenity of the occupiers and users of the adjoining premises at Stoney Street from undue overlooking in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 - High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 'Protection of Amenity' of the Southwark Plan 2007.

27. ROOF PLANT

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

Reason:

In order to ensure that no additional plant is placed on the roof of the building

in the interest of the appearance and design of the building and the visual amenity of the area in accordance with The National Planning Policy Framework 2019, Strategic Policy 12 - Design and Conservation of The Core Strategy 2011 and Saved Policies 3.2 Protection of Amenity and 3.13 Urban Design of the Southwark Plan 2007.

28. RESTRICTION ON USES

Notwithstanding the details shown on the drawings hereby approved:

(a) not more than 45% of the gross internal area of the retail floorspace situated at ground and first floor level shall at any time be used as restaurants, cafes public houses, wine bars and/or drinking establishments or any combination thereof;

(b) not more than 10% of the gross internal area of the retail floorspace situated at ground and first floor level shall at any time be used as public houses, wine bars and/or drinking establishments or any combination thereof; and

(c) not more than one unit on Stoney Street shall be used as a public house, wine bar and/or drinking establishment [and in the event such a unit is provided the relevant unit shall contribute to the overall provision of such uses when calculating the gross internal area of retail floorspace used for such a purpose pursuant to paragraph (a) and (b) above].

Unless otherwise agreed by the Council in writing and subject always to the restrictions contained in paragraph (a) to (c) above, the uses referred to in this condition (being restaurants, cafes, public houses, wine bars and drinking establishments) shall not be located other than within those units identified in green or yellow on drawing references 1405-SS-20-0G-01-200-P_1 and 1405-SS-20-01-01-200-P_1 both received 24 June 2021.

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case and wishes to have the opportunity of exercising control over concentrations of restaurant, cafe, public house, wine bar and drinking establishment uses in accordance with Strategic Policy 13 - High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007 and the National Planning Policy Framework 2019.

29. NO SUPERMARKET

No high street supermarket (as defined in the associated legal agreement), shall occupy any retail unit hereby approved.

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case specifically the desire to retain and protect the special and unique character of the area, and to ensure no adverse servicing impacts, in accordance with Strategic Policy 3 - Shopping, leisure and entertainment of The Core Strategy 2011, Policy 4.9 Small shops of the London Plan 2015 and SP2 Sustainable Transport of the Core Strategy 2011.

30. NO MERGING OF UNITS

No retail unit shall be merged, combined, or consolidated with any other retail unit to form a larger retail unit, without having first obtained express written consent from the council. A retail unit is defined as one which has been uniquely identified by an individual reference number, as illustrated on the ground and first floor plans hereby approved.

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case and wishes to have the opportunity of exercising control over any subsequent alterations in order to protect and preserve the special and unique character of the area, in accordance with Strategic Policy 13 - High environmental standards and Strategic Policy 3 - Shopping, leisure and entertainment of The Core Strategy 2011.

31. PLANT NOISE

The rated noise level from any plant, together with any associated ducting shall be 10dB(A) or more below the lowest relevant measured LA90 (15min) at the nearest noise Sensitive premises. Prior to the commencement of the authorised use, a written acoustic report detailing the proposed scheme shall be submitted to and approved by the Local Planning Authority. The method of assessment is to be carried in accordance with BS4142:1997 'Rating industrial noise affecting mixed residential and industrial areas'. The plant and equipment shall be installed and constructed in accordance with the approval given and 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 2019, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

32. BIA

The basement shall be constructed, retained and maintained in accordance with the principles set out in the submitted Basement Impact Assessment.

Reason:

To minimise the potential for the site to contribute to surface water flooding in accordance with Policy 5.12 Flood Risk Management of the London Plan, Strategic Policy 13 of the Core Strategy (2011) saved policy 3.9 Water of the Southwark Plan and guidance in the Sustainable Design and Construction SPD (2009).

33. LIGHTING

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, details of any external lighting [including design, power and position of luminaries] and security surveillance

equipment of external areas surrounding the building shall be submitted to and approved by the Local Planning Authority in writing before any such lighting or security equipment is installed. The development shall not be carried out otherwise in accordance with any such approval given.

Reason:

In order that the Council 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 2019, 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.

34. INFILTRATION

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, no drainage systems for the infiltration of surface water drainage in to the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason:

Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil or made ground which could ultimately cause pollution of groundwater.

35. PILING

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason:

The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into contaminated sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to controlled waters.

36. UNEXPECTED CONTAMINATION

Unless already approved pursuant to permission ref. 15/AP/3066 dated

24/03/2017 or ref. 19/AP/1649 dated 2/10/2019 if, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

Reason:

There is always the potential for unexpected contamination to be identified during development groundworks. We should be consulted should any contamination be identified that could present an unacceptable risk to controlled waters.

37. ARCHAEOLOGICAL FINDINGS

Unless already approved pursuant to permission ref. 15/AP/3066 dated 24/03/2017 or ref. 19/AP/1649 dated 2/10/2019, within one year of the completion of archaeological site works, an assessment report detailing the proposals for post-excavation works, publication of the site and preparation of the archive shall be submitted to and approved in writing by the Local Planning Authority and that the works detailed in this assessment report shall not be carried out otherwise than in accordance with any such approval given.

Reason:

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

38. ADDITIONAL CYCLE PARKING

The five additional short-stay cycle stands within Soap Yard shown on approved drawing 1405-SS-20-0G-01-01-P_13 received 30 June 2021 shall be installed within four months of the date of this permission. Thereafter the cycle parking facilities provided shall be retained and the space used for no other purpose and the development shall not be carried out otherwise in accordance with any such approval given.

Reason:

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

39. NO USE OF FLAT ROOF

The flat roof of the ground floor to unit 192/192A hereby permitted shall not be used other than for maintenance purposes, as a means of escape and as a green roof, and shall not be used for any other purpose including use as a roof terrace or balcony or for the purpose of sitting out.

Reason

In order that the privacy of neighbouring properties may be protected from overlooking from use of the roof area in accordance with The National Planning Policy Framework 2019, Strategic Policy 13 High environmental standards of The Core Strategy 2011 and Saved Policy 3.2 'Protection of Amenity' of the Southwark Plan 2007.

40. APPROVED DEVELOPMENT QUANTUM

The total quantum of built floorspace across the development shall not exceed the figures specified below in GIA and sqm:

Retail	7799.3
Office	5632
Cinema	670.5
Gallery	361.5
Ancillary	1893

Reason:

To ensure that the development is carried out in accordance with the approved plans and documents that form the basis of the decision, and otherwise conforms to the principles of sustainable development as described in the National Planning Policy Framework 2019.

41. NO CHANGE OF USE

Notwithstanding the provisions of use Class E of the Town and Country Planning (Use Classes) Order 1987 and any associated provisions of the Town and Country Planning General Permitted Development Order 2015 (including any future amendment or enactment of those Orders) the uses hereby permitted shall only be used as follows in the locations shown on the approved plans, and for no other use:

Shops - display or retail sale of goods, other than hot food
 Restaurants and cafes - sale of food and drink for consumption (mostly) on the premises
 Public houses, wine bars or other drinking establishments (but not night clubs) including drinking establishments with expanded food provision;
 Offices to carry out any operational or administrative functions,
 Cinema;
 Gallery - display of works of art (otherwise than for sale or hire).

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case and wishes to have the opportunity of exercising control over any proposed loss of retail, office, cinema or gallery space and its proposed replacement use in accordance with Strategic Policies 3 Shopping, leisure and entertainment, 10 Jobs and businesses and 13 High

environmental standards of The Core Strategy 2011, saved policies 1.7 Development within town and local centres and 3.2 Protection of Amenity of the Southwark Plan 2007, the National Planning Policy Framework 2019, and with regard to draft policies P31, P33, P34 and P55 and the area vision for Bankside and Borough of the emerging New Southwark Plan.

42. NOISE FROM COMMERCIAL UNITS

A scheme of sound insulation shall be installed to ensure that the LFmax sound from amplified and non-amplified music and speech shall not exceed the lowest L90,5min 1m from the facade of the nearby residential premises at all third octave bands between 63Hz and 8kHz.

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 2019, Strategic Policy 13 'High environmental standards' of the Core Strategy (2011) and saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007).

Permission is subject to the following Special Condition(s)

43. GATE DETAILS

Within one month of the date of this permission, details of the gate to be installed near the Park Street access (including its siting, height, design and materials) shall be submitted to and approved in writing by the Local Planning Authority. The gate shall be installed in accordance with the approved details and within four months of the Local Planning Authority's approval.

Reason:

In order that the Local Planning Authority may be satisfied that the gates will achieve a quality of design and detailing for their prominent location, within a conservation area and setting of listed buildings, and would not raise highway safety issues in accordance with policies: 3.11 Efficient use of land; 3.12 Quality in Design; 3.13 Urban Design; 3.15 Conservation of the historic environment; 3.16 Conservation areas; 3.18 Setting of listed buildings, conservation areas and world heritage sites; and 5.2 Transport Impacts of The Southwark Plan (2007) and SP12 Design and Conservation of the Core Strategy (2011).

Appendix 1: Recommendation

Recommendation for 21/AP/0326

This document shows the case officer's recommended decision for the application referred to below.

This document is not a decision notice for this application.

Applicant	C/O Agent MB Bermondsey (Guernsey) Ltd	Reg. Number	21/AP/0326
Application Type	Variation/discharge of Legal Agreement		
Recommendation	Agreed - for App Types VLA & VNMC		

Draft of Decision Notice

the variation is **AGREED** for the following development subject to completion of a legal agreement:

Variation of the section 106 agreement relating to planning permission refs 15/AP/3006 and 19/AP/1649 (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 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 an Small Enterprise shall not include any Supermarket owner and/or operator".

1 Bank End And Thames House, 18 Park Street London SE1 9BU

In accordance with application received on 28 January 2021

APPENDIX 2 - Condition drawing of the first floor

- GENERAL NOTES**
- Dimensions are in millimetres unless otherwise stated.
 - Levels are in metres AOD unless otherwise stated.
 - The wall of plates on the special arrangement plans is 1500mm above FFL.
 - In accordance with British Standards, Room areas are calculated 1,500mm above FFL.
 - Figure dimensions to be worked in all cases.
 - S.P. = elevation setting out post.



3.

4.

Restaurant/Cafe (E(b); former Class A3) – up to 45% of the total retail floorspace, less the retail floorspace used for drinking establishments.

Public House/Wine Bar/Drinking Establishment (Sui Generis; former Class A4) – up to 10% of the total retail floorspace, initially including Units 192A and 205. A maximum of one drinking establishment can be located on Stoney Street; a change to the location from Unit 205 will be subject to approval from the Council.

- 4.
- SOUTHWARK CATHEDRAL
 - LONDON BRIDGE STATION
 - LONDON BRIDGE HOSPITAL
 - HOSPITAL SHAD

- 3.
- TATE MODERN
 - SHAKESPEARE'S GLOBE
 - BANKSIDE GALLERY
 - PURDY HICKS GALLERY

- 2.
- CROSSBONE GARDEN
 - BOROUGH STATION

- 1.
- BOROUGH MARKET
 - GUY'S HOSPITAL
 - KING'S COLLEGE LONDON

REVISIONS	Date	Rev	By	Description	Date	Rev	By	Description	Date	Rev	By	Description

Job Title	1405 - Borough Yards
Client	MB Bermondsey Ltd
Drawing Title	Proposed First Floor Plan
Uses (Illustration)	Uses (Illustration)
Scale (if any)	1:200
Drawn By	AN
Checked	AN
Date Checked	13.05.21
Drawing Number & Revision	1405-SS-20-01-01-200-P_1
Checker	Author
Option	01
Status	PLANNING

Relevant planning history

Reference and Proposal	Status
<p>17/AP/3840 Non-material amendment to planning 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, 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.' to allow for:</p> <p>Creation of a first floor link between the offices in Thames House and building 2, Reduction in main office reception area for building 1 and building 2; Changes to the roof design at building 2, and An increase in size of gallery space at first floor level.</p>	<p>Agreed 30/10/2017</p>
<p>15/AP/3066 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.</p>	<p>Granted with Legal Agreement 24/03/2017</p>
<p>18/AP/0961 Non-material amendment to planning permission reference 15AP3066 to allow changes to the development comprising of a reduction of cinema main entrance area on ground floor of Building 1 (from 92.5 sqm GIA to 52 sqm GIA); Increase of ground floor retail unit 001 area at Building 1 (from 148 sqm GIA to 189 sqm GIA); and, Alteration to east elevation of Building 1, including omission of door and replacement with shopfront window. No changes are proposed to the main cinema use at basement level.</p>	<p>Agreed 18/04/2018</p>

<p>18/AP/3035 Non-material amendment pursuant to planning 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, 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.) The amendment is to change the wording of Condition 9 (External Facing materials), Condition 13 (Shopfront Strategy) and Condition 14 (Bay Study Drawings) to amend the trigger for submission of details relating to each condition.</p>	<p>Agreed 16/10/2018</p>
<p>19/AP/1649 Variation of condition 2 (approved plans) of planning 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, 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' to make minor-material amendments including:</p> <ul style="list-style-type: none"> • Alterations to internal retail layouts dictated by an updated Fire Strategy, • Alterations to the west elevation of Building 02, • Alterations to the east elevation of Building 02 dictated by change of first floor use; and • Alterations to elevations of Building 04. 	<p>Variation Minor Material Change GRANTED 30/10/2019</p>

<p>19/AP/7552 Variation of Condition 1 - Approved plans of planning permission 19/AP/1649 (Variation of condition 2 (approved plans) of planning permission 15/AP/3066 (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' to make minor-material amendments including: Alterations to internal retail layouts dictated by an updated Fire Strategy, Alterations to the west elevation of Building 02, Alterations to the east elevation of Building 02 dictated by change of first floor use; and Alterations to elevations of Building 04.) for the following changes: 1. Part infill of arches 194/195 2. Alterations to the delivery and servicing strategy 3. Relocation of cycle parking spaces 4. Alterations to the provision of the public realm</p>	Application withdrawn 22/01/2021
<p>20/AP/1742 Non-material amendment of planning permission LBS reg no 19/AP/1649 for the Variation of Condition 2 (approved plans) of planning 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, 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 cafe/restaurants and A4 drinking establishments use) at ground and first floor levels, a gallery (Class D1 use) at ground floor level, office floor space (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' to make minor material amendments including: Alterations to internal retail layouts dictated by an updated Fire Strategy, Alterations to the west elevation of Building 02, Alterations to the east elevation of Building 02 dictated by change of first floor use; And Alterations to elevations of building 04.</p>	Agreed 01/09/2020
<p>20/AP/2133 Non material amendment to planning permission 19/AP/1649 dated 2nd October 2019 for 'Variation of condition 2 (approved plans) of planning permission 15/AP/3066. The amendments consists of the following: to substitute approved plans to reflect a required alteration to the glass edge which forms the northern tip of Building 2. A masonry edge that follows the same line as the consented scheme to the northern tip of Building 2 is being proposed.</p>	Agreed 25/02/2021

<p>20/AP/3745</p> <p>Non-material amendment to planning permission 19/AP/1649 (Variation of condition 2 (approved plans) of planning 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, 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' to make minor-material amendments including: Alterations to internal retail layouts dictated by an updated Fire Strategy; Alterations to the west elevation of Building 02; Alterations to the east elevation of Building 02 dictated by change of first floor use; and Alterations to elevations of Building 04) to alter the wording of Condition 8 (regarding the Post Construction Review) in order to change the timescales associated with the trigger of the condition from 'Before first occupation' to 'Within six months of occupation'.</p>	<p>Agreed 16/03/2021</p>
<p>21/AP/0644</p> <p>Non material amendment to planning permission ref. 19/AP/1649 dated 2nd October 2019 for 'Variation of condition 2 (approved plans) of planning 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, 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' to make minor-material amendments including: Alterations to internal retail layouts dictated by an updated Fire Strategy, Alterations to the west elevation of Building 02, Alterations to the east elevation of Building 02 dictated by change of first floor use; and Alterations to elevations of Building 04'.</p> <p>The proposed amendments seek the following:</p> <ul style="list-style-type: none"> - increase in size and relocation of a louvre from the fourth level to the fifth level with introduction of brick infill at fourth level - remove two of the louvres on the second and third levels with introduction of brick infill in place and - relocate and reduce the size of one louvre at ground level with introduction of brick infill at ground level. 	<p>Agreed 19/05/2021</p>

<p>21/AP/1393 Details of condition 30 (No combining of retail units without consent from the council) to merge units 192A, 192 and 193 to form a single unit, pursuant to planning permission ref. 19/AP/1649 (Variation of condition 2 (approved plans) of planning 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, 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').</p>	Pending consideration
<p>21/AP/1998 Request for an Environmental Impact Assessment screening opinion in respect of the development proposed within the section 73 application ref. 21/AP/0507 to vary condition 28 to make amendments in relation to the floorspace use class mix and other minor material amendments to the scheme approved by planning permission ref. 19/AP/1649 granted on 2 October 2019 (for variation of condition 2 (approved plans) of planning 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, 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' to make minor-material amendments including: Alterations to internal retail layouts dictated by an updated Fire Strategy; Alterations to the west elevation of Building 02; Alterations to the east elevation of Building 02 dictated by change of first floor use; and Alterations to elevations of Building 04').</p>	Screening Opinion issued 25/06/2021

<p>20/AP/3594 Discharge of Schedule 5, Part 3, paragraph 12 (Visitor Management Plan) of the S106 Agreement relating to planning permission ref. 19/AP/1649 (Variation of condition 2 (approved plans) of planning 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, 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' to make minor-material amendments including: Alterations to internal retail layouts dictated by an updated Fire Strategy, Alterations to the west elevation of Building 02, Alterations to the east elevation of Building 02 dictated by change of first floor use; and Alterations to elevations of Building 04.)</p>	Pending consideration
<p>21/AP/1580 Discharge of Schedule 5, Part 2, paragraphs 7 to 11 (Site Wide Servicing Management Strategy) of the s106 agreement relating to planning permission ref. 19/AP/1649 (Variation of condition 2 (approved plans) of planning 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, 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' to make minor-material amendments including: Alterations to internal retail layouts dictated by an updated Fire Strategy, Alterations to the west elevation of Building 02, Alterations to the east elevation of Building 02 dictated by change of first floor use; and Alterations to elevations of Building 04.)</p>	Pending consideration

Planning policies and material considerations

Planning policy and material considerations

National Planning Policy Framework

1. The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications. The relevant sections are:
 - Chapter 2 Achieving sustainable development
 - 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 16 Conserving and enhancing the historic environment.

The London Plan 2021

2.
 - GG1: Building strong and inclusive communities
 - GG2: Making the best use of land
 - GG3: Creating a healthy city
 - GG5: Growing a good economy
 - GG6: Increasing efficiency and resilience
 - SD1: Opportunity Areas
 - SD4: The Central Activities Zone
 - SD6: Town centres and high streets
 - SD7: Town centres development principles and Development Plan Documents
 - 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
 - D8: Public realm
 - D11: Safety, security and resilience to emergency
 - D12: Fire safety
 - D13: Agent of Change
 - D14: Noise
 - S1: Developing London's social infrastructure
 - E1: Offices
 - E9: Retail, markets and hot food takeaways
 - E10: Visitor infrastructure
 - E11: Skills and opportunities for all
 - HC1: Heritage conservation and growth
 - HC4: London View Management Framework

HC5: Supporting London's culture and creative industries
 HC6: Supporting the night-time economy
 G1: Green infrastructure
 G5: Urban greening
 G6: Biodiversity and access to nature
 G7: Trees and woodlands
 SI1: Improving air quality
 SI2: Minimising greenhouse gas emissions
 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 (including T6.2 office parking, T6.3 retail parking and T6.5 non-residential disabled persons parking)
 T7: Deliveries, servicing and construction
 T9: Funding transport infrastructure through planning
 DF1: Delivery of the Plan and planning obligations.

The Core Strategy 2011

3. 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 10 - Jobs and businesses
 - Strategic Policy 11 - Open spaces and wildlife
 - Strategic Policy 12 - Design and conservation
 - Strategic Policy 13 - High environmental standards
 - Strategic Policy 14 - Implementation and delivery.

The Southwark Plan 2007 (Saved policies)

4. The Council's cabinet on 19 March 2013, as required by paragraph 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF. 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 1.11 Arts, culture and tourism uses
 Policy 2.5 Planning obligations
 Policy 3.1 Environmental effects
 Policy 3.2 Protection of amenity
 Policy 3.3 Sustainability assessment
 Policy 3.4 Energy efficiency
 Policy 3.6 Air quality
 Policy 3.7 Waste reduction
 Policy 3.9 Water
 Policy 3.11 Efficient use of land
 Policy 3.12 Quality in design
 Policy 3.13 Urban design
 Policy 3.14 Designing out crime
 Policy 3.15 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 3.28 Biodiversity
 Policy 3.29 Development within the Thames Policy Area
 Policy 3.31 Flood defences
 Policy 5.1 Locating developments
 Policy 5.2 Transport impacts
 Policy 5.3 Walking and cycling
 Policy 5.6 Car parking
 Policy 5.7 Parking standards for disabled people and the mobility impaired
 Policy 5.8 Other parking.

Supplementary Planning Document and other relevant documents

5. Section 106 Planning Obligations and CIL SPD (2015 and addenda)
Borough High Street Conservation Area Appraisal (2006)

Greater London Authority Supplementary Guidance

6. Character and Context SPG (2014)

Emerging policy

7. 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 and the amendments within the Proposed Changes to the Submitted New Southwark Plan will be considered along with the consultation responses received at each stage of public consultation. It is anticipated that the plan will be adopted later in 2021 following the EiP which will replace the saved policies of the 2007 Southwark Plan and the 2011 Core

Strategy.

8. Paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework. The most relevant policies of the NSP are as follows:
- P12 Design of places
 - P13 Design quality
 - P15 Designing out crime
 - P17 Efficient use of land
 - P18 Listed buildings and structures
 - P19 Conservation areas
 - P20 Conservation of the historic environment and natural heritage
 - P22 Archaeology
 - P33 Railway arches
 - P38 Shopfronts
 - P44 Healthy development
 - P48 Public transport
 - P49 Highway impacts
 - P50 Walking
 - P51 Low Line route
 - P52 Cycling
 - P53 Car parking (no substantial objections were received, comments related to minimising residential car parking)
 - P55 Protection of amenity
 - P58 Green infrastructure
 - P59 Biodiversity
 - P60 Trees
 - P61 Reducing waste
 - P63 Contaminated land and hazardous substances
 - P64 Improving air quality
 - P67 Reducing flood risk
 - P68 Sustainability standards
 - IP3 Community infrastructure levy and section 106 planning obligations.
9. Where draft policies are different from the adopted policy (or are completely new policies) and objections were received, the specifics of those objections and the differences from the adopted policy need to be considered for each planning application proposal. For example:
- P24 – River Thames – the submission version adds new point (part 8) about considering the River Thames for transport means during construction.
 - P27 - Access to employment and training – objection was received relating to the financial burden.
 - P29 - Office and business development – objections related to the two year marketing justification and differentiation of B Class uses.
 - P30 - Affordable workspace – objections relating to strengthening the policy and including viability testing.
 - P31 – Small shops - objections related to lower threshold and 10%

requirement.

P34 - Town and local centres – objections relate to a lower threshold and strengthening the policy.

P45 – Leisure, arts and culture - representations related to strengthening the policy.

P46 - Community uses – objections to strengthening this policy.

P65 - Reducing noise pollution and enhancing soundscapes – the agent of change principle in the NPPF must also be considered.

10. Where objections were received to a draft policy and these have not been resolved through revisions, that policy can have only limited weight. In these instances, the degree of change from adopted policy on these topics should also be considered. Examples of these policies include:
 - P54 - Parking standards for disabled people and mobility impaired people.
 - P69 - Energy – objections that the December 2017 version P62 being too onerous for the carbon reductions.
11. 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.

Consultation undertaken

Site notice date: 04/03/2021

Press notice date: 04/03/2021

Case officer site visit date: 05/05/2021

Neighbour consultation letters sent: 03/06/2021

Internal services consulted

Environmental Protection

Transport Policy

Highways Development and Management

Local Economy

Design and Conservation Team [Formal]

Statutory and non-statutory organisations

Metropolitan Police Service (Designing Out Crime)

GLA

Neighbour and local groups consulted:

Borough Market 8 Southwark Street
London

24 Park Street London

Bramah House 65-71 Bermondsey
Street London

By Email XX

24 Park Street London SE1 9EQ

23 Park Street London SE1 9EQ

5 Winchester Wharf 4 Clink Street
London

Flat 6 Evans Granary Apartments 38
Stoney Street

Flat 8 28 Park Street London

Flat 7 28 Park Street London

Flat 1 28 Park Street London

Flat 4 28 Park Street London

Flat 1, 28 Clennam Street London SE1
1ER

Blake Morgan 33 St John's Lane London

Flat 6 28 Park Street London

65 Carpenders Avenue Carpenders Park
Watford

Flat 1 Pontifex Wharf 36 Stoney Street
London

2 Osborne Close London SE24 0HB

Flat 4 Pontifex Wharf Apartments, 36
Stoney Street London

One Curzon Street London W1J 5HD

St Saviour's House 39-41 Union Street
London

Flat 10 Sussex House Maidstone Mews
London

Email

Flat 5 Clink Wharf Clink Street

Flat 4 Clink Wharf Clink Street

Studio 1 Clink Wharf Clink Street

Clink Prison Museum Soho Wharf Clink
Street

8 Stoney Street London SE1 9AA

10 Park Street London SE1 9AB

9 Stoney Street London SE1 9AA

Jade House 3 Park Street London

43 Park Street London SE1 9EA

41 Park Street London SE1 9EA

Second Floor Rear West 16 Winchester
Walk London

Second Floor Rear East 16 Winchester
Walk London

First Floor Centre East 16 Winchester
Walk London

Second Floor Rear 14 Winchester Walk
London

Second Floor Front 14 Winchester Walk
London

First Floor 14 Winchester Walk London
 First Floor Centre 16 Winchester Walk
 London
 Ground Floor Rear 16 Winchester Walk
 London
 Ground Floor Front West 16 Winchester
 Walk London
 Flat 3 Evans Granary Apartments 38
 Stoney Street
 Flat 2 Evans Granary Apartments 38
 Stoney Street
 Flat 1 Evans Granary Apartments 38
 Stoney Street
 Basement And Ground Floor 4 Park
 Street London
 Marias Market Cafe Borough Market 8
 Borough High Street
 Ground Floor West Winchester Wharf 4
 Clink Street
 Messrs Le Marche Borough Market 8
 Borough High Street
 34 Park Street London SE1 9EF
 3 Rochester Walk London SE1 9AF
 22 Park Street London SE1 9EQ
 21 Park Street London SE1 9EQ
 20 Park Street London SE1 9EQ
 Ground Floor Thames House 18 Park
 Street
 First Floor North Thames House 18 Park
 Street
 10 Stoney Street London SE1 9AD
 Bridge Studios 13 Park Street London
 The Community Space 18 Great
 Guildford Street London
 The Woolyard 52 Bermondsey Street
 London
 7A Park Street London SE1 9AB
 6-8 Park Street London SE1 9AB
 The Rake 14A Winchester Walk London
 7B Park Street London SE1 9AB
 2 Park Street London SE1 9AB
 15 Park Street London SE1 9AB
 4A Park Street London SE1 9AB
 11 Park Street London SE1 9AB
 7 Park Street London SE1 9AB
 Flat 3 Clink Wharf Clink Street
 10-14 Park Street London SE1 9AB
 Flat 2 Clink Wharf Clink Street
 Flat 6 Clink Wharf Clink Street
 39 Park Street London SE1 9EA
 49 Park Street London SE1 9EA
 47 Park Street London SE1 9EA
 45 Park Street London SE1 9EA
 37 Park Street London SE1 9EA
 25 Park Street London SE1 9EQ
 35 Park Street London SE1 9EA
 33 Park Street London SE1 9EA
 26 Park Street London SE1 9EQ
 69 Park Street London SE1 9EA
 67 Park Street London SE1 9EA
 65 Park Street London SE1 9EA
 31 Park Street London SE1 9EA
 71 Park Street London SE1 9EA
 63 Park Street London SE1 9EA
 55 Park Street London SE1 9EA
 53 Park Street London SE1 9EA
 51 Park Street London SE1 9EA
 61 Park Street London SE1 9EA
 59 Park Street London SE1 9EA
 57 Park Street London SE1 9EA
 First To Third Floors 13 Stoney Street
 London
 Basement And Ground Floor 13 Stoney
 Street London
 First Floor And Second Floor 10 Stoney
 Street London
 First Floor Warehouse F Winchester
 Square
 Ground Floor Warehouse F Winchester
 Square
 17 Park Street London SE1 9AB
 Lower Ground Floor Soho Wharf Clink
 Street
 Fifth Floor Soho Wharf Clink Street
 Fourth Floor Soho Wharf Clink Street
 Ground Floor 13 Park Street London
 Basement And Ground Floor 9 Park
 Street London
 Basement And Ground Floor 5 Park
 Street London
 First Floor Rear West 16 Winchester
 Walk London
 First Floor Rear East 16 Winchester
 Walk London
 Part Ground Floor Front East 16
 Winchester Walk London
 11B Stoney Street London SE1 9AD
 1A Park Street London SE1 9AB
 Merchant House 14-16 Stoney Street
 London
 Anchor 1 Bankside London
 18 New Globe Walk London SE1 9DR

Studio 30 Soho Wharf Clink Street
 Flat 1 Clink Wharf Clink Street
 Flat 7 Clink Wharf Clink Street
 15 Winchester Walk London SE1 9AG
 First Floor Soho Wharf Clink Street
 Ground Floor Warehouse Corner Of
 Stoney Street Clink Street
 Ground Floor Soho Wharf Clink Street
 Third Floor Soho Wharf Clink Street
 Second Floor Soho Wharf Clink Street
 First Floor Warehouse Corner Of Stoney
 Street Clink Street
 Waterside Apartment Clink Wharf Clink
 Street
 Flat B Clink Wharf Clink Street
 Flat A Clink Wharf Clink Street
 8 Park Street London SE1 9AB
 First Floor And Second Floor Flat 12
 Stoney Street London
 First Floor And Second Floor Flat 3 Park
 Street London
 First To Third Floors 5 Park Street
 London
 The Factory Winchester Wharf 4 Clink
 Street
 First Floor Flat 11 Stoney Street London
 Second Floor And Third Floor Flat 11
 Stoney Street London
 Messrs Drinks Cage Ltd Borough Market
 8 Borough High Street
 1A Bank End London SE1 9BU
 Unit 1 Victor Wharf Clink Street
 First Floor Front West 16 Winchester
 Walk London
 Flat 12 Victor Wharf Clink Street
 Flat 11 Victor Wharf Clink Street
 Flat 10 Victor Wharf Clink Street
 First Floor Front East 16 Winchester
 Walk London
 Flat 14 Victor Wharf Clink Street
 Flat 13 Victor Wharf Clink Street
 40 Stoney Street London SE1 9LB
 Fourth Floor And Fifth Floor 30 Park
 Street London
 1-2 Rochester Walk London SE1 9AF
 Roast At The Floral Hall Borough Market
 8 Borough High Street
 Basement Offices 2 Redcross Way
 London
 Flat 1 Little Winchester Wharf 5 Clink
 Street
 Flat 2 Little Winchester Wharf 5 Clink
 Street
 2 Winchester Wharf 4 Clink Street
 London
 Flat 3 Little Winchester Wharf 5 Clink
 Street
 First Floor 12 Stoney Street London
 Basement And Ground Floor 12 Stoney
 Street London
 Studio 2 Clink Wharf Clink Street
 Second Floor Front 16 Winchester Walk
 London
 Flat 6 Victor Wharf Clink Street
 Flat 5 Victor Wharf Clink Street
 Flat 4 Victor Wharf Clink Street
 Flat 9 Victor Wharf Clink Street
 Flat 8 Victor Wharf Clink Street
 Flat 7 Victor Wharf Clink Street
 Flat 3 Victor Wharf Clink Street
 Borough Market Cathedral Street
 London
 4 Winchester Wharf 4 Clink Street
 London
 3 Winchester Wharf 4 Clink Street
 London
 Flat 2 Victor Wharf Clink Street
 Flat 1 Victor Wharf Clink Street
 Cage 34A Borough Market 8 Southwark
 Street
 Three Crown Square Borough Market 8
 Southwark Street
 Ground Floor Left 30 Park Street London
 11A Park Street London SE1 9AB
 The Market Hall Borough Market 8
 Southwark Street
 Market Hall Borough Market 8
 Southwark Street
 Green Market Borough Market 8
 Southwark Street
 Flat 4 Winchester Wharf 5 Clink Street
 Second Floor 30 Park Street London
 City And Farmers Market Borough
 Market 8 Southwark Street
 Floral Hall Market Borough Market 8
 Southwark Street
 Middle Road Market Borough Market 8
 Southwark Street
 Flat 13 Evans Granary Apartments 38
 Stoney Street
 Flat 12 Evans Granary Apartments 38
 Stoney Street

Flat 11 Evans Granary Apartments 38
Stoney Street
Third Floor 30 Park Street London
Ground Floor Right 30 Park Street
London
Flat 14 Evans Granary Apartments 38
Stoney Street
Flat 10 Evans Granary Apartments 38
Stoney Street
Flat 5 Evans Granary Apartments 38
Stoney Street
Flat 4 Evans Granary Apartments 38
Stoney Street
Flat 9 Evans Granary Apartments 38
Stoney Street
Flat 8 Evans Granary Apartments 38
Stoney Street

Flat 7 Evans Granary Apartments 38
Stoney Street
First Floor 30 Park Street London
Cold Store Borough Market 8 Borough
High Street
225-227 Clink Street London SE1 9DG
Flat 5 28 Park Street London
First Floor 9 Park Street London
Flat 3 28 Park Street London
Flat 2 28 Park Street London
Apartment 1 Soho Wharf 1 Clink Street
Penthouse Apartment Soho Wharf 1
Clink Street
Apartment 3 Soho Wharf 1 Clink Street
Apartment 2 Soho Wharf 1 Clink Street

Re-consultation:

Those who responded on the first consultation

Consultation responses received

Internal services

Environmental Protection
Highways Development and Management
Local Economy
Transport Policy

Statutory and non-statutory organisations

Metropolitan Police Service (Designing Out Crime)

Neighbour and local groups:

Councillors Victor Chamberlain, Adele Morris and David Noakes

Flat 15 Bermondsey Exchange 179-181
Bermondsey Street London
11 Porter Street London SE1 9HD
12 Tennis Court 7, Winchester Square
London
40 ewhurst road brockley london
Flat 3, Little Winchester Wharf 5 Clink
Street London
7 Horseshoe Wharf Apartments 6 Clink
Street London
2 Horseshoe Wharf Apartments 6 Clink
Street London
2A Redcross Way London Southwark
2B Redcross Way London Southwark
2B Redcross Way London Southwark
1 Horseshoe Wharf Apartments 6 Clink
Street London

6 Horseshoe Wharf Apartments 6 Clink
Street London
(no address given)
Flat 5 Helder Court LONDON
Flat 32 Benbow House 24 New Globe
Walk
Flat 14 Benbow House 24 New Globe
Walk
Flat 68 Benbow House 24 New Globe
Walk
5 Pickfords Wharf Clink Street London
Flat 10 Minerva House Montague Close
The Hop Exchange 24 Southwark Street
London
14 Winchester Walk Borough Market

Flat 23 Benbow House 24 New Globe
Walk
Unit 56 Jubilee Place Borough Market 8
Southwark Street
18 Great Guildford Street London
Southwark
18 Great Guildford Street London
Southwark
Unit 5MW Jubilee Place Borough Market
8 Southwark Street
Northfield Farm Limited, Northfield Farm,
Whissendine Lane, Cold Overton,
Oakham, Leicestershire LE15 7QF
15 Benbow House 24 New Globe Walk
London
Flat B Clink Wharf Clink Street London
20 Dawkins Court 2 Garland Close
London
Borough Market 8 Southwark Street
London
23 Park Street London SE1 9EQ
5 Winchester Wharf 4 Clink Street
London
St Saviour's House 39-41 Union Street
London
Studio 1 Clink Wharf Clink Street
10-14 Park Street London SE1 9AB
55 Park Street London SE1 9EA
53 Park Street London SE1 9EA
51 Park Street London SE1 9EA
57 Park Street London SE1 9EA
Flat 1 Clink Wharf Clink Street
Flat B Clink Wharf Clink Street

Flat A Clink Wharf Clink Street
 Flat 1 Little Winchester Wharf 5 Clink Street
 Studio 2 Clink Wharf Clink Street
 3 Winchester Wharf 4 Clink Street London
 2 Winchester Stables London SE1 9BH
 Flat 9 Evans Granary Apartments 38 Stoney Street
 Flat 4 28 Park Street London
 Flat 5 3 Winchester Square London
 11 Portland Court 52 Trinity Street London
 Flat 1 Winchester Stables Winchester Square London
 38 Roxburgh Road London Se27 Old
 2 Little Winchester Wharf 5 Clink Street London
 Flat 10, Victor Wharf Clink Street London
 4 Horseshoe Wharf Apartments 6 CLINK STREET London
 16A Winchester Walk Flat 3 London
 Clink Street Apartment 3 Clink Wharf London
 57 Park Street London
 16A Winchester Walk Flat 3 London
 2 Little Winchester Wharf 5 Clink Street London
 7 Victor Wharf Clink St London
 Flat 14 Victor Wharf London
 Flat 70 Benbow House 24 New Globe Walk
 24 Park Street London Southwark
 23 Park Street London SE1 9EQ
 Apartment A Clink Wharf Clink Street London
 2a Redcross Way London SE1 9HR
 13 Tennis Court 7 Winchester Square London
 55 Park Street London SE1 9EA
 9 Horseshoe Wharf 6 Clink Street London
 First To Third Floors 5 Park Street London
 Flat 1, 28 Park Street London SE1 9EQ
 6 Pickfords Wharf Clink Street London
 Flat 12 Minerva House Montague Close
 Flat 8 Evans Granary Apartments 38 Stoney Street
 2B Redcross Way London Southwark
 Flat 4, 4 Clink Street London SE1 9DL
 Flat 4 4 Winchester Wharf London
 Flat 4 Denehurst Court 16 Denehurst Gardens, Acton London
 2 Osborne Close London
 13 Devon House London SE1 1GE
 Northfield Farm Stoney Street Entrance, Borough Market London
 101 Pickhurst Rise London BR40AE
 Flat 4 3 Winchester stables Southwark
 Flat 3 3 Winchester square Southwark
 flat 6 montague close London
 Flat B Clink Wharf London SE1 9DG
 Flat A, Clink Wharf Clink Street London
 13 Park St London SE1 9AB
 12 Victor Wharf Clink St London
 16B Winchester Walk London Se1 9ag
 Flat 7 Pickfords Wharf Apartments Clink Street London
 22 Park Street London SE1 9EX
 57 Park Street London
 Southwark Cathedral Montague Close London
 Flat 3 Winchester Wharf 4 Clink Street
 Flat 11 7 Winchester Square London
 Flat 11 7 Winchester Square London
 Flat 9 6 Montague Close London
 5 Pickfords Wharf Clink Street London
 Office A, Dale's Brewery, Gwydir Street, Cambridge, CB1 2LJ
 Flat 3 28 Park Street London
 Flat 54 Benbow House 24 New Globe Walk
 2A Redcross Way London Southwark
 4A Redcross Way London Southwark
 1 Winchester Wharf 4 Clink Street London
 Flat 12 Minerva House Montague Close
 Flat 14 Victor Wharf Clink Street
 4 Montague Close London Southwark
 Flat 7 Minerva House Montague Close
 Flat 4 Winchester Wharf 5 Clink Street
 Flat 9A Minerva House Montague Close
 Flat 9 Minerva House Montague Close
 Flat 9A Minerva House Montague Close

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COMMITTEE:

PLANNING COMMITTEE

MUNICIPAL YEAR 2021-22

NOTE:

Original held in Constitutional Team; all amendments/queries to Gregory Weaver, Constitutional Team, Tel: 020 7525 7055)

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Councillor Richard Livingstone	1		
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Councillor Bill Williams	1		
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Councillor Jon Hartley (Reserve)		LEGAL TEAM	
Councillor Nick Johnson (Reserve)		Jonathan Gorst	1
Councillor Eleanor Kerslake (Reserve)			
Councillor James McAsh (Reserve)		CONSTITUTIONAL TEAM	
Councillor Victoria Mills (Reserve)		Gregory Weaver	10
Councillor Margy Newens (Reserve)			
MEMBER OF PARLIAMENT (Paper and Electronic)		TOTAL PRINT RUN	23
Helen Hayes MP, House of Commons, London, SW1A 0AA	1		

List Updated: 21 May 2019