

## Planning Committee

Wednesday 8 March 2023

6.30 pm

Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2QH

### Membership

Councillor Richard Livingstone (Chair)  
Councillor Kath Whittam (Vice-Chair)  
Councillor Ellie Cumbo  
Councillor Nick Johnson  
Councillor Richard Leeming  
Councillor Reginald Popoola  
Councillor Bethan Roberts  
Councillor Cleo Soanes

### Reserves

Councillor Sam Foster  
Councillor Jon Hartley  
Councillor Sarah King  
Councillor Sunny Lambe  
Councillor Margy Newens  
Councillor Sandra Rhule  
Councillor Michael Situ  
Councillor Emily Tester

---

### 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.

#### Babysitting/Carers allowances

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

#### Access

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](http://www.southwark.gov.uk) or please contact the person below.

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

---

Members of the committee are summoned to attend this meeting

**Althea Loderick**

Chief Executive

Date: 28 February 2023



# Planning Committee

Wednesday 8 March 2023

6.30 pm

Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2QH

## Order of Business

Item No.	Title	Page No.
1.	<b>APOLOGIES</b>	
	To receive any apologies for absence.	
2.	<b>CONFIRMATION OF VOTING MEMBERS</b>	
	A representative of each political group will confirm the voting members of the committee.	
3.	<b>NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT</b>	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	<b>DISCLOSURE OF INTERESTS AND DISPENSATIONS</b>	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	<b>DEVELOPMENT MANAGEMENT</b>	1 - 5
	<b>5.1. RED LION COURT, 46-48 PARK STREET, LONDON SE1 9EQ</b>	6 - 149
	<b>5.2. 160 BLACKFRIARS ROAD, LONDON SE1</b>	150 - 240

**EXCLUSION OF PRESS AND PUBLIC**

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

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

Date: 28 February 2023

## Planning Committee

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

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

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

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

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



issues need to be clarified later in the proceedings; it is **not** an opportunity to take part in the debate of the committee.

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

**Please note:**

Those wishing to speak at the meeting should notify the constitutional team by email at [ConsTeam@southwark.gov.uk](mailto:ConsTeam@southwark.gov.uk) in advance of the meeting by **5pm** on the working day preceding the meeting.

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

**Contacts:**      General Enquiries  
                         Planning Section, Chief Executive's Department  
                         Tel: 020 7525 5403  
  
                         Planning Committee Clerk, Constitutional Team  
                         Finance and Governance  
                         Tel: 020 7525 5485

<b>Item No.</b> 5.	<b>Classification:</b> Open	<b>Date:</b> 8 March 2023	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>		Development Management	
<b>Ward(s) or groups affected:</b>		All	
<b>From:</b>		Proper Constitutional Officer	

### RECOMMENDATIONS

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

### BACKGROUND INFORMATION

4. The council's powers to consider planning business are detailed in Part 3F which describes the role and functions of the planning committee and planning sub-committees. 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 Levelling Up, Housing and Communities 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**

#### **Assistant Chief Executive – Governance and Assurance**

- 12. A resolution to grant planning permission shall mean that the director of planning and growth 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 and growth 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 and growth 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 assistant chief executive – governance and assurance, and which is satisfactory to the director of planning and growth. 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 assistant chief executive – governance and assurance. 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.
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 the Southwark Plan which was adopted by the council in February 2022. The Southwark Plan 2022 was adopted after the London Plan in 2021. For the purpose of decision-making, the policies of the London Plan 2021 should not be considered out of date simply because they were adopted before the Southwark Plan 2022. London Plan policies should be given weight according to the degree of consistency with the Southwark Plan 2022.
16. The National Planning Policy Framework (NPPF), as amended in July 2021, is a relevant material consideration and should be taken into account in any decision-making.
17. Section 143 of the Localism Act 2011 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.
18. "Regulation 122 of the Community Infrastructure Levy regulations (CIL) 2010 as amended, 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."

19. 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.

## BACKGROUND DOCUMENTS

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

## APPENDICES

No.	Title
None	

**AUDIT TRAIL**

<b>Lead Officer</b>	Chidilim Agada, Head of Constitutional Services		
<b>Report Author</b>	Gerald Gohler, Constitutional Officer Nagla Stevens, Deputy Head of Law (Planning and Development)		
<b>Version</b>	Final		
<b>Dated</b>	17 February 2023		
<b>Key Decision?</b>	No		
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>			
<b>Officer Title</b>		<b>Comments sought</b>	<b>Comments included</b>
Assistant Chief Executive – Governance and Assurance		Yes	Yes
Director of Planning and Growth		No	No
<b>Cabinet Member</b>		No	No
<b>Date final report sent to Constitutional Team</b>			17 February 2023

# Agenda Item 5.1



Southwark Maps includes © Crown copyright and database rights 2023 OS (0100019252). Aerial imagery from Verisk. The default base map is OS mapping remastered by Europa Technologies..

## CONTENTS

RECOMMENDATION .....	3
EXECUTIVE SUMMARY .....	4
BACKGROUND INFORMATION.....	5
Site location and description .....	5
Details of Proposal.....	9
Consultation responses from members of the public .....	12
KEY ISSUES FOR CONSIDERATION.....	17
Summary of main issues.....	17
Legal Context.....	17
EQUALITIES .....	18
Environmental Impact Assessment.....	19
PRINCIPLE OF DEVELOPMENT IN TERMS OF LAND USE .....	19
DESIGN CONSIDERATIONS .....	26
Site Layout.....	27
Height scale and massing .....	29
IMPACT OF PROPOSED DEVELOPMENT ON AMENITY OF ADJOINING OCCUPIERS AND SURROUNDNG AREA.....	52
Impact of the Proposed Use.....	52
Daylight and Sunlight Impacts.....	52
Overlooking of Neighbouring Properties .....	59
TRANSPORT CONSIDERATIONS .....	60
Trip Generation .....	61
Active Transport.....	64
Cycling .....	65
Construction.....	67
ARCHAEOLOGY.....	69
ENVIRONMENTAL CONSIDERATIONS .....	69
Flood Risk and Water Resources .....	69
Fire.....	71
Ground Conditions and Contamination .....	72
Air Quality .....	72
Noise and Vibration.....	73



SUSTAINABLE DEVELOPMENT IMPLICATIONS .....	73
Energy .....	73
Overheating .....	75
Whole life cycle and carbon capture .....	75
Circular economy statement .....	75
BREEAM.....	76
Digital connectivity infrastructure .....	76
PLANNING OBLIGATIONS (Section 106 Undertaking or Agreement).....	77
Mayoral and Southwark Community Infrastructure Levy (CIL).....	82
OTHER MATTERS.....	82
STATEMENT OF COMMUNITY INVOLVEMENT .....	82
Human rights implications .....	87
CONCLUSION ON PLANNING ISSUES.....	87
Consultation responses from external and statutory consultees .....	88
SUPPLEMENTARY ADVICE FROM OTHER OFFICERS .....	93
BACKGROUND DOCUMENTS .....	93

<b>Item No.</b> 5.1	<b>Classification:</b> Open	<b>Date:</b> 8 March 2023	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<p><b>Development Management planning application:</b> Application 22/AP/1602 for: FULL PLANNING APPLICATION</p> <p><b>Address:</b> Red Lion Court, 46-48 Park Street, London SE1 9EQ</p> <p><b>Proposal:</b> Demolition of the existing building above ground and part-basement and redevelopment of the site to provide an 11-storey stepped building with rooftop plant, plus a two storey basement, providing office, retail, restaurant and wellness uses alongside external terraces, landscaping, public realm works, new plant equipment, internal loading bays, cycle parking spaces and other associated works.</p> <p>For information: The proposed building would have a maximum height of 11 storeys (46.7 metres above Ordnance Datum, approx 41.6 metres above ground level). The development as a whole comprises:</p> <ul style="list-style-type: none"> <li>- 32,036 square metres GIA of office (Class E) floorspace;</li> <li>- 338 square metres GIA of restaurant (Class E) floorspace;</li> <li>- 229 square metres GIA of retail (Class E) floorspace;</li> <li>- 105 square metres GIA of wellness use (Class E) floorspace;</li> <li>- 1 wheelchair accessible car parking space; and</li> <li>- 168 short-stay cycle spaces and 719 long-stay cycle spaces.</li> </ul>		
<b>Ward(s) or groups affected:</b>	Borough and Bankside		
<b>From:</b>	Director of Planning and Growth		
<b>Application Start Date</b>	6 May 2022	<b>Application Expiry Date</b>	5 August 2022
<b>Earliest Decision Date</b>	16 May 2022	<b>Time extension:</b>	

## RECOMMENDATION

1.
  - a) That planning permission be granted, subject to conditions, referral to the Mayor and the applicant entering into an appropriate legal agreement by no later than the 31 May 2023.
  - b) In the event that the requirements of (a) are not met by the 31 May 2023 that the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 307 of this report.

## EXECUTIVE SUMMARY

### Commercial GIA:

Use Class	Existing	Proposed	Change +/-
<b>Class E(g)(i) (offices / workspace)</b>	17,335sqm	28,596sqm	+11,261sqm
<b>Class E(a) (Retail)</b>	0sqm	229sqm	+229sqm
<b>Class E(b) (Restaurants)</b>	0sqm	338sqm	+338sqm
<b>Class E(e) (Wellness Centre)</b>	0sqm	105sqm	+105sqm

### Environmental:

<b>CO2 Savings beyond part L Building Regs</b>	49% - Non-domestic
--	--------------------

	Existing	Proposed	Change +/-
<b>Urban Greening Factor</b>	0	0.35	+0.35
<b>Surface water runoff rates (1 in 100 year)</b>	153.1 l/s	4.5 l/s	-148.6 l/s
<b>Green/Brown Roofs</b>	0sqm	1,264sqm	+1,264sqm
<b>Cycle parking spaces</b>	0	719 Long stay 167 Short stay	+886 total

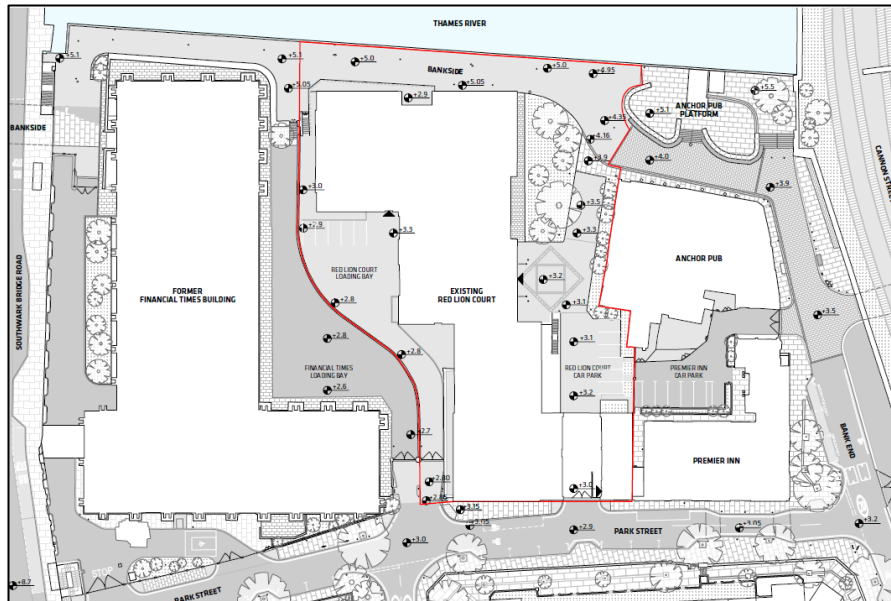
CIL and S106 (Or Unilateral Undertaking):

<b>CIL net of relief (estimated)</b>	£1,464,237
<b>MCIL net of relief (estimated)</b>	£3,098,179
<b>S106</b>	£855,851

**BACKGROUND INFORMATION****Site location and description**

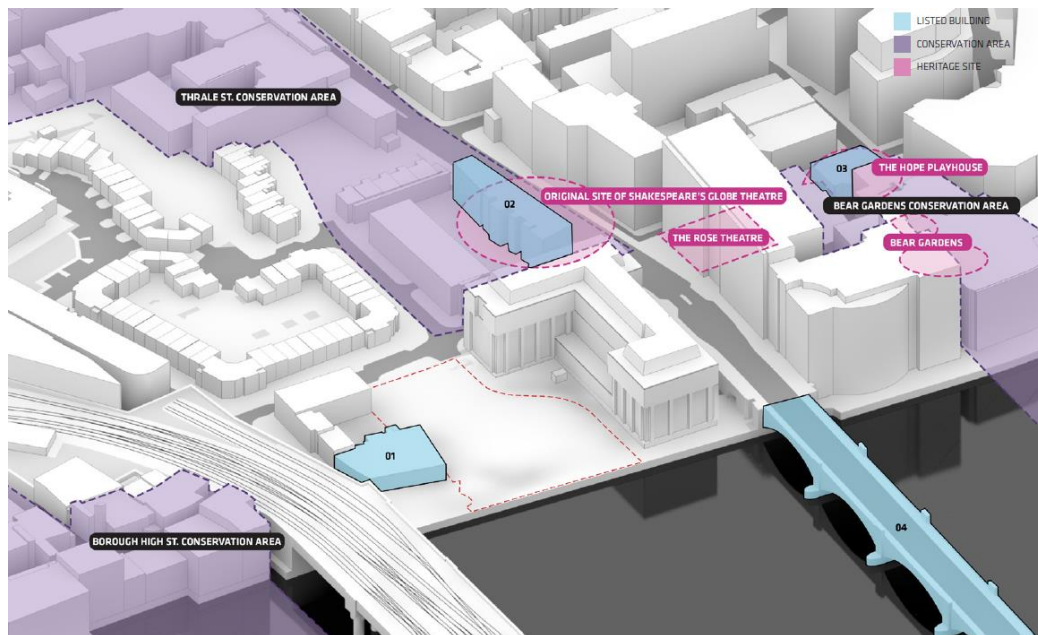
2. The application site comprises a seven storey building (plus basement) originally constructed in 1989. It has an existing E(g)(i) class use (offices). It is known as Red Lion Court and had been occupied by Lloyds until they vacated the building in 2021.
3. The entire property has since been let on a meanwhile use to Aspire Via Studio who are a unique property-based charity, sourcing and managing artist's studios and event spaces.
4. The site includes a section of the Thames Path, a publicly accessible pedestrian footpath along the south bank of the River Thames. Pedestrian access to the existing Red Lion Court building is provided from Park Street to the south of the site and from the Thames Path on Bankside to the north of the site. Pedestrian access to the existing Red Lion Court building is also possible via a secure access arrangement with no general public access to or through the Red Lion Court area of the site. Vehicular access to the existing Red Lion Court building is provided from Park Street to the south of the site at two points via a secure gated arrangement. These provide access to the land around the building, to 13 car parking spaces and for servicing and deliveries
5. The building immediately to the east of the site is the Anchor Bankside public house, a Grade II Listed Building. Immediately to the south-east is the Premier Inn Hotel. To the west is the 'Financial Times (FT) building' at 1 Southwark Bridge Road. The site is bound by the River Thames to the north, Park Street and the adjoining Porter Street, which is largely residential, with a combination of terraced houses and low-rise apartment buildings to the south.

## Map: Site Plan



6. The existing building is not listed and is not located within a Conservation Area but is located near several designated heritage assets. The site is located within close proximity of the Grade II listed Southwark Bridge, Anchor Terrace (1 Southwark Bridge Road), Anchor Public House (1 Bankside) and Union Works. The Bear Gardens Conservation Areas is located to the west, the Thrale Street Conservation Area is located to the south east and the Borough High Street Conservation Area is located to the east. The site is located within close proximity to the internationally important Globe Theatre and Rose Theatre, both scheduled ancient monuments.
7. The site is within the following policy designations:
  - Bankside and the Borough Area Vision;
  - Central Activities Zone (CAZ);
  - Thames Policy Area;
  - Bankside and Borough District Town Centre;
  - Bankside, Borough and London Bridge Opportunity Area;
  - North Southwark and Roman Roads Archaeological Priority Area;
  - South Bank Strategic Cultural Quarter Strategic Cultural Area;
  - Better Bankside BID Area;

## Image: Heritage assets



### Key

1. Anchor Pub
2. Anchor Terrace
3. Union Works
4. Southwark Bridge

8. The site is in Flood Zone 3. The site is also within the following protected views:
  - Local View 1: The London panorama of St Pauls Cathedral from One Tree Hill;
  - Local View 2: The linear view of St Pauls Cathedral from Nunhead Cemetery;
  - Background Assessment Area of the LVMF view 1A.2 - Alexandra Palace Viewing Terrace to St Paul's Cathedral; and
  - Background Assessment Area of the LVMF view 3A.1 - Kenwood Viewing Gazebo to St Paul's Cathedral.
9. The site is allocated within the Southwark Plan (2022) as part of a joint allocation with the FT building. The site requirements of Site Allocation NSP06 "1 Southwark Bridge Road and Red Lion Court". The site requirements for this site allocation are:

### Redevelopment of the site must:

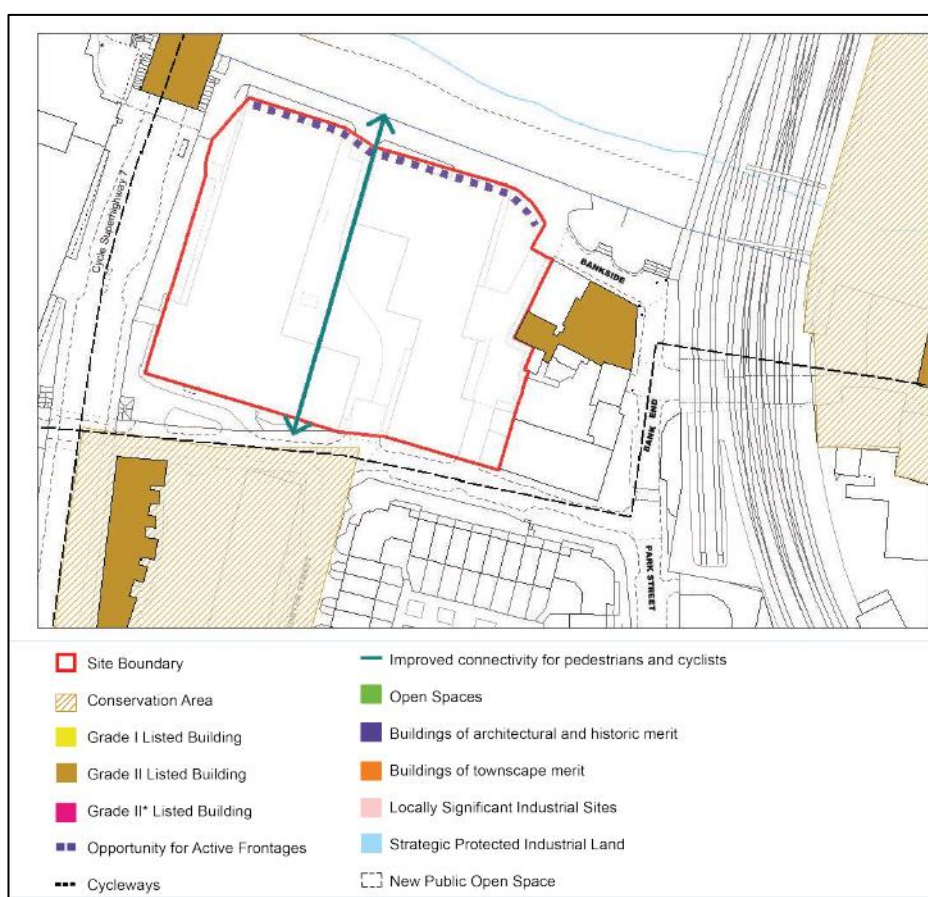
- Provide at least the amount of employment floorspace (E(g), B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and

- Enhance the Thames Path by providing public realm and active frontages with ground floor retail, community or leisure uses (as defined in the glossary); and
- Provide new north-south green links; and
- Provide new open space of at least 15% of the site area - 1,183m<sup>2</sup>.

Redevelopment of the site should also provide new homes (C3).

- The site allocation also states that any redevelopment should provide a new link from Park Street to the Thames Path and improvements to the Thames Path.

### Map: Site allocation in Southwark Plan



- Transport for London's (TfL) Public Transport Accessibility Level (PTAL) provides a score of 1-6b to rate areas within London and their accessibility to public transport options. A score of 1 represents the lowest accessibility with 6b being the best locations of accessibility to public transport. The subject site is rated as 6b on the PTAL system indicating excellent accessibility to public transport.
- The River Thames and the embankment located immediately north of the site is designated as a Site of Importance for Nature Conservation (SINC).

## Details of Proposal

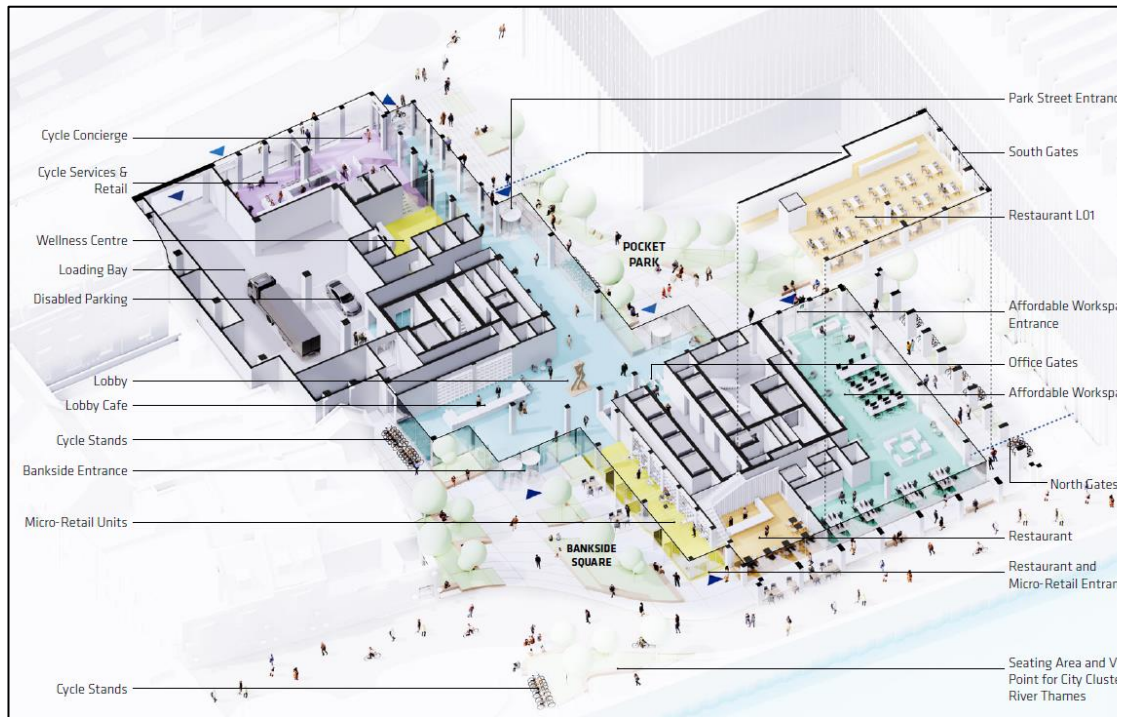
13. Planning permission is sought for the demolition of the existing building on site and redevelopment to provide a 11-storey plus basement building providing office, retail, restaurant and wellness uses. The development would provide landscaping, public realm works, new plant equipment, cycle parking spaces and other associated works.
14. In terms of the split in the commercial use, the development would provide:

<b>Class use</b>	<b>GIA Floor area (sqm)</b>
Class E(g)(i) Office	28,596
Class E(a) Retail	229
Class E(b) Restaurants	338
Class E(e) (Wellness Centre)	105
<b>Total</b>	<b>29,268</b>

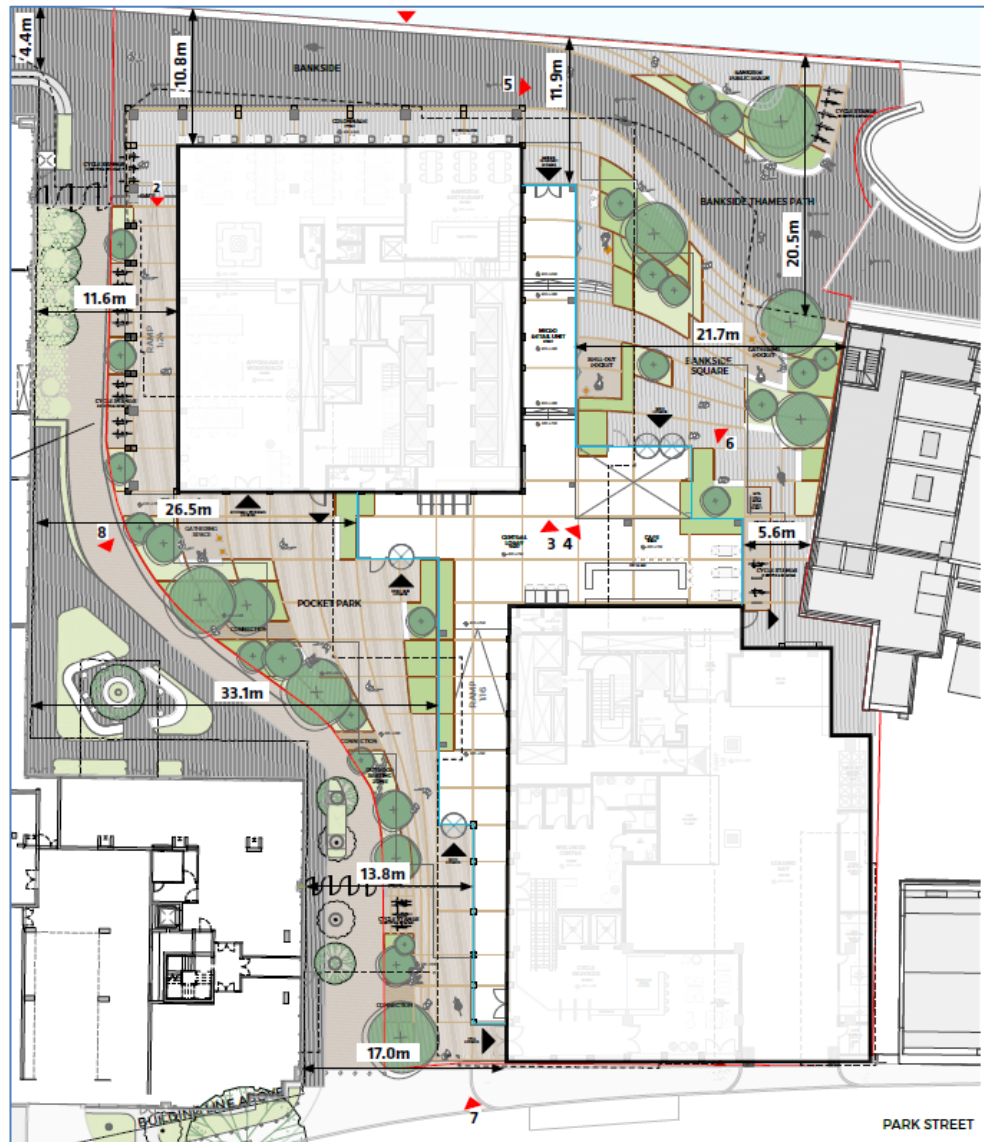
15. The plant room would be 3,697sqm, giving a total of 32,965sqm. The office floorspace will include a policy compliant level of affordable workspace at 10% of the gross floorspace.
16. The scheme proposes significant landscaping and public realm works to improve and enliven the spaces around building by increasing the size of the Thames Path and north-south through route. At ground level, the lifted mass provides two new, generous public spaces linked together by the building's lobby. At the North a new 'Bankside Square' is created adjacent to the Grade II listed Anchor Pub. At the south, in conjunction with the neighbouring former Financial Times building, a centralised landscaped space would be created in association with a new north-south route through the site. New internal routes also link the Bankside and Park Street via an extensive, clear glazed, ground floor lobby flanked with micro-retail units at the north and wellness centre and Cycle Services Hub at the south.
17. Improvements to public realm and pedestrian experience surrounding the site will be delivered including the conversion of the existing service yard to publicly accessible space, the opening of a pedestrian route between Park Street and Bankside, an addition of a new publicly accessible square at the northeast of the site, improved footway widths on Park Street and an expansion of the Bankside Path.



**Image: Block layout**

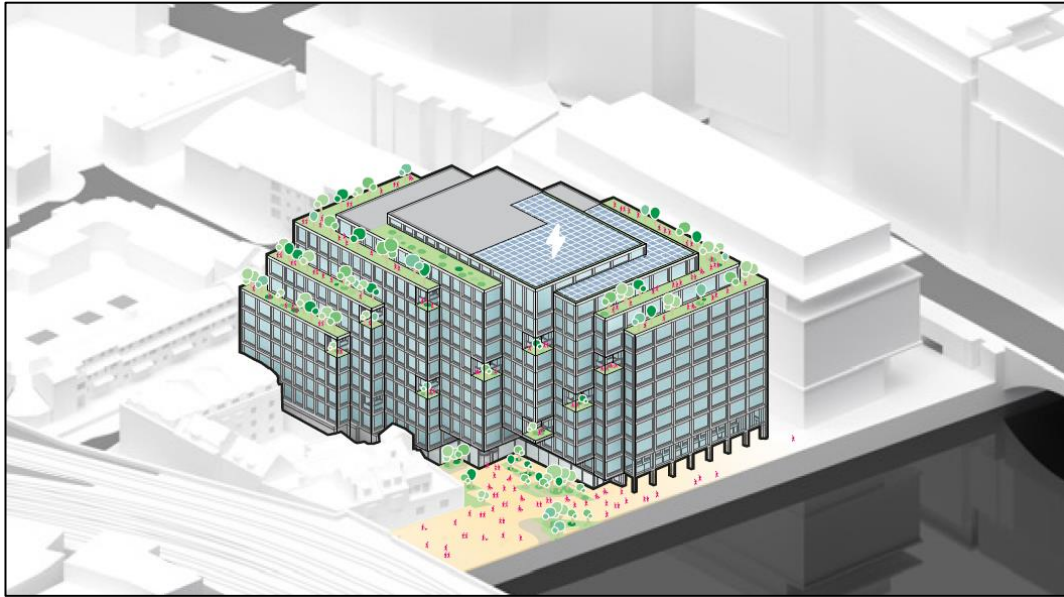


## Plan: Indicative Site Plan



18. The proposed development is arranged, in massing terms, as a series of 'jumping' blocks of differing sizes that opens up the ground plane to create a series of new, enhanced publicly accessible urban spaces. The lifted upper floors would sit over the ground floor level and provides the enhanced public spaces and routes through. The building and façade treatment employs a simple, standardised grid that accentuates the building's stepped massing. It has a repeated stepped form and quasi-symmetry.
19. The overall form delivers a significant expanse of external terraces; each one landscaped and forming amenity in connection with the workspace within the building. A series of pocket terraces are also deployed throughout, ensuring that each level has access to the outdoors.

**Image: Stepped massing**



20. Servicing would be made entirely within the off-street loading bay, which is accessed from Park Street. The site offers one accessible parking space located off the loading bay. The designated bay will be marked, have a clear circulation zone and ramped to access the central lobby. Taxi drop-off will be available along Park Street, near the southern entrance.
21. There are two basement levels. The scheme will retain part of the existing basement and will re-use the majority of the existing piles, which is beneficial in relation to embodied carbon. The existing basements will be deepened across the whole building footprint to incorporate two levels. The basement will also be extended in an area (404sqm) to the east of the current basement retaining wall. Basement 02 is entirely dedicated to building services whilst Basement 01 contains the end-of-trip cycle facilities including short and long stay parking, male and female changing rooms, building security and staff rooms.

**Revisions and Amendments**

22. Negotiations were undertaken following review of the application and comments made by consultees.
23. In line with the changes detailed above, revised documents regarding elevations, and floor plan drawings were submitted along with revision to various supporting documents. The changes were considered to be minor and therefore did not require a second round of consultation.

**Consultation responses from members of the public**

24. This application was subject to one round of formal consultation, which was carried on 20 May 2022.

25. At the time of writing, a total of 107 consultation responses had been received from members of the public and local businesses and organisations. 102 representations received objected to the scheme with 5 in support. Some of the objections were from the same address.
26. Objections  
The main issues raised by residents objecting to the proposed development are set out below:
27. Land Use - Given the already excessive redevelopment in this area it would seem unnecessary to provide additional office space when so much is available in this area giving a danger of oversupply resulting in dead space. There might not be a need post-pandemic. There is no need for the retail or wellness centre as there are others nearby. There is no provision of affordable housing.
28. Officer response: The principle of the uses are acceptable and is discussed in the report.
29. Height - The development is too high and bulky on the Park Street side, despite the 'stepped' design. The Park Street facade to be overbearing and out of scale with the residential user and neighbouring Anchor PH/hotel. It is considered to be overdevelopment of the site overwhelming the local residential estate in height, size and mass. Minimal thought has been given to this side of the development, with the focus being along the northern, western and eastern facades. The proposal takes no account of the adjacent listed buildings the enjoyment of which from adjacent areas is entitled to protection. The proposed structure intrudes on protected views of St Pauls.
30. Officer response: This is discussed under the height and design sections of the report.
31. Architecture and design – Question why the proposal is largely glass, instead of the (more suitable/sympathetic to the area) brick of the existing building. The existing Red Lion Court building has architectural appeal providing a bridge between the modern buildings adjoining on its west side and the historic buildings on its East side. Redeveloping this site as proposed would destroy the feel and be out of character of this part of Park street and the adjoining Anchor Inn and Clink street.
32. Officer response: The existing building being redeveloped with a more contemporary design is considered to be acceptable along this part of the riverfront. The proposed building does use bricks for parts of the building. More is discussed in the design sections of the report.
33. Heritage – the new building is even more out of scale with the Anchor Pub. As a tall glass box it will have considerably less "evident relationship" than the current building

34. Officer response: The impacts on the nearby heritage assets are covered in the Heritage section of this report. The impact is less than substantial harm, but great weight and, in accordance with the NPPF, should be balanced against the planning benefits of the scheme.
35. Overshadowing – In an area already starved of sky, the overbearing nature of the development (significantly taller and bulkier than the current building on the site along the Park Street facade) will further steal any sense of sky from neighbouring residents. There will be loss of natural light to neighbouring residents.
36. Officer response: The submitted daylight and sunlight assessment demonstrates there would not be a significant loss of natural light to the nearby residents.
37. Impact on resident's amenity – In effect this will bring the bulk of the development closer up against Park Street. This infilling will result in an impact on the privacy in neighbour's garden, and reduce the sense of openness currently enjoyed. Concerned about increased overlooking and loss of privacy from this significant difference to the footprint of the current building on the site. The proposed terraces would lead to overlooking.
38. Local residents have suffered continued extensive noise, dust, traffic disruption, blocked roads by construction traffic over the past 3 years due to redevelopment around Old Theatre Court in Park Street and immediately surrounding roads, culminating particular in the redevelopment of No 1 Southwark bridge road, it would seem intolerable for local residents to be subjected to this antisocial environment for a further two or three years and greater pollution and noise resulting from servicing such buildings in the future. It is causing physical and mental disturbance. Should the Council approve this then should at minimum approve plans only with a delayed start of 4 years to allow some respite for local residents.
39. The expansion and connection from Park Street to the Thames footpath is not wanted by local residents as it increases footfall out of hours, and bathroom seekers and noise at night. There would be increased anti-social activities.
40. Officer response: This is discussed in detail under the amenity section of the report. A detailed construction environmental management plan would be secured post-permission to ensure the environmental effects are minimised. The new route would be closed after certain hours, limiting the footfall out of hours.
41. Transport and traffic - The infrastructure around this is inappropriate for servicing and supporting more office and retail space with narrow roads with low bridges providing the only access for traffic. Lack of car parking in the area would lead to further congestion.
42. Officer response: This is discussed under the Transport section of the report.

43. Impact on existing businesses - this form of development will have an unacceptable overbearing impact on the hotel. It is inevitable that the Premier Inn hotel would be subjected to unacceptable amenity impacts from this proximity during the construction of the building as currently proposed, with noise and dust being of particular concern to the hotel's operators. Increase in proximity to the existing hotel and the proposed development brings windows, roof and 'pocket' terraces (with glazed balustrades) very close to the site boundary where they will overlook the bedrooms on that side of the hotel. The proposed development will cause problems of overlooking, loss of privacy and disturbance to the hotel bedrooms. There is no justification for building so close to the hotel beyond the developer's desire to overdevelop the site. Premier Inn does not agree that its guests should not have a reasonable expectation of daylight/sunlight in this location. Some form of extract will be required from the loading bay and that this will be discharging into a space close to hotel bedroom windows. These vehicle exhaust fumes are therefore likely to have an unacceptable impact on air quality for both the Premier Inn hotel and the Anchor public house.
44. The Noise Impact Assessment fails to consider noise created by vehicles manoeuvring within the loading bay.
45. Officer response: This is discussed in the report. There would be limited overlooking to the hotel. The air quality assessment and noise impact assessment have been assessed by the Environmental Protection Team (EPT) and found to be acceptable.
46. Lack of consultation - Engagement with the local community has been poor and residents never received a reply to their concerns.
47. Officer response: The applicant has carried out a series of public consultation events prior to the submission of the application. Officers have also sent consultation letters and published this in the local press.
48. Environment - ignores the impact of demolishing existing sound buildings. There would be negative impact on the climate change of constant rebuilding. Question the sustainability of the new building when the existing Red Lion Court still has a lifespan.
49. The Council should charge the developer a sum of money if the building does not last longer than the existing. There would be pollution from the development's construction. The parts of the green space which are under the building cannot be considered genuine green/open spaces as they will not flourish in practice.
50. Officer response: The re-use of the existing building to increase floorspace is not possible in this instance. The applicant has submitted an energy strategy, whole life cycle assessment and Circular Economy statement to ensure the impact on climate change is minimised.

51. Other – request that any permitted development rights should be removed which might in the future accommodate any desire to add stores to the consented scheme without the express grant of planning permission. There is negligible community gain and no benefits for local residents. There is no social regeneration.
52. Officer response: A condition can be imposed to limit the uses proposed.
53. Support  
4 responses (including amenity group) are supportive of the development and a summary of their responses are set out below:

The development will greatly improve footfall and custom for local businesses. As well as enhancing the aesthetics along this section of the river. Believe that the proposals for Red Lion Court will significantly improve this area of the Thames Pathway, providing new spaces for the whole community to use – including attractive new outdoor areas – and will make a major contribution to the local economy. This will be to the benefit of the Globe and local businesses and residents alike. The Rose Theatre Trust would like to endorse the proposals of the Red Lion Project.

### **Consultation responses from amenity groups**

54. Better Bankside  
Better Bankside welcomes the proposals to improve the quality and accessibility of the public realm around the building. We are pleased to see permeability from the riverside enhanced, and the high-quality approach proposed in terms of proposed materials and planting. We support proposals to deliver additional urban greening through the inclusion of a variety of planting in different parts of the site and will also include ecological enhancements at roof level and through the inclusion of habitat elements such as bird boxes for priority species. We would welcome further information on the sustainable drainage strategy for the public realm spaces and suggest that this could be conditioned when permission is granted.
55. We warmly welcome the inclusion of a secure cycle park within Red Lion Court to encourage active travel. In particular, the shower and changing facilities as well as cycle repair and maintenance which can create opportunities to engage more people in cycling. We encourage the developer to consider the influence of Red Lion Court for promoting cycling in the area more holistically.
56. We support the expansion for the pedestrian route from the Thames Pathway and Park Street. We promote the use of active signage to encourage the use of the through route to Park Street, and any additional greening or place-making to make that route safe, accessible and cohesive with the surrounding public realm. We would encourage further exploration of a through route on the border with the Anchor and Premier Inn Hotel.
57. We would welcome conversations with the developer on how the Green Logistics Centre could support Red Lion Court's logistics and opportunities to

include zero-emission last-mile logistics. Due to Red Lion Court's riverside location, we would like to see the potential of river freight for deliveries and servicing included in the developer's plans. We would be interested in conversations with the developer about how construction materials can be delivered to site in ways that reduce the environmental impact of their logistics. We are encouraged by Red Lion Court's commitment to sustainability through net zero construction and operation of the building.

58. Officer response: The group supports the scheme and much of the above have been discussed

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

59. The main issues to be considered in respect of this application are:
- The principle of the proposed development in terms of land use;
  - Affordable workspace;
  - Design, layout, tall building, heritage assets including views;
  - Public realm, landscaping and trees;
  - Impact of proposed development on amenity of adjoining occupiers and surrounding area;
  - Transport;
  - Noise and vibration;
  - Sustainable development implications;
  - Ecology;
  - Air quality;
  - Archaeology;
  - Fire safety;
  - Water resources and flood risk;
  - Land contamination;
  - Equalities and human rights;
  - Statement of community involvement.

### **Legal context**

60. 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, and the Southwark Plan 2022.
61. 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.



## EQUALITIES

62. The Equality Act (2010) provides protection from discrimination for the following protected characteristics: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. Section 149 of the Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers, including planning powers. Officers have considered this in the assessment of this application and Members must be mindful of this duty, *inter alia*, when determining all planning applications. In particular Members must pay due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act; and
  - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
  - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
63. As set out in the Essential Guide to the Public Sector Equality Duty (2014), “the duty is on the decision maker personally in terms of what he or she knew and took into account. A decision maker cannot be assumed to know what was in the minds of his or her officials giving advice on the decision”. A public authority must have sufficient evidence in which to base consideration of the impact of a decision.
64. There are a large number of existing black and ethnic minority businesses in the local area, which would not be directly affected by the proposed development. However, the impact of the development would increase footfall in the local area and could create a number of opportunities for these existing businesses.

### Other Equality Impacts

65. Proposed enhancements to the streetscape on the Thames footpath and would prioritise the movement of pedestrians and promote healthier, active lives in accordance with the Southwark Plan aspirations.
66. The proposed development would provide a mix of commercial uses. The commercial facilities in the scheme would be provided to modern design standards, including compliance with the regulations on accessibility. The proposed development would generate additional opportunities for local employment. Furthermore, the 10% Affordable Workspace proposed will be secured through the S106 Agreement.
67. The proposal would be designed to ensure safety and security is maximised to reduce any potential for crime. Linkages into and sightlines across the site would be improved and buildings will be designed to meet Secure by Design standards, as discussed later in the report.

68. The proposal includes the provision of new public realm area, which would increase the level of high-quality accessible pedestrian routes available in the area. This feature will have a number of positive benefits, especially for those who are mobility impaired. The improvements to the public realm would encourage more active travel, which would improve health and quality of life.

#### Conclusion on Equality Impacts

69. The proposed development would not result in any adverse equality impacts in relation to the protected characteristics of religion or belief and race as a result of the proposed development incorporating improved commercial in E Use Class. Notwithstanding that the development would result in a significant change to the site, Officers are satisfied that equality implications have been carefully considered throughout the planning process and that Members have sufficient information available to them to have due regard to the equality impacts of the proposal as required by Section 149 of the Equality Act 2010 in determining whether planning permission should be granted.

#### **Environmental Impact Assessment**

70. Due to the scale of the scheme, a request for a formal screening opinion to determine whether the development constitutes an Environmental Impact Assessment (EIA) development as defined by the Town and Country Planning EIA Regulations 2017 was submitted to the Council in November 2021.
71. The request (Ref: 21/AP/4003) was considered under Schedule 2, 10(b) Urban Development Projects of the EIA Regulations. It was considered that proposals would not exceed the threshold identified within Schedule 2 (10b). Nevertheless, Regulations make it clear that proposals can be screened in any event, because they could have significant environmental effects even if they do not exceed the thresholds.
72. Based on the consideration of the proposals against the requirements set out in Schedule 3, it was considered that the development is unlikely to cause potentially significant effects and that any minor effects which are considered to be not significant in EIA terms and outlined above will be appropriately addressed and mitigated within the technical inputs submitted as part of the planning application and through design of the site. As such it was concluded that an EIA was not required in support of the application for this development.

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

73. The existing building is currently being used by an arts charity as a meanwhile use, having been occupied previously by Lloyds (banking group) in 2021. The lawful existing use of the building all land within its curtilage is, therefore, Class E (Commercial, Business and Service). More specifically, it falls within the Class E(g)(i) subcategory (Offices to carry out any operational or administrative functions)

## Designations

### Bankside and the Borough Area Vision

74. The vision in the New Southwark Plan (Southwark Plan 2022) notes that the Bankside and Borough are part of the London Central Activities Zone and the Bankside, Borough and London Bridge Opportunity Area delivering 10,000 new jobs and the Bankside and Borough District Town Centre. Site allocations in Bankside and the Borough will deliver at least 166,000sqm (gross) new offices and employment workspaces and around 0.3ha new open space.

### Bankside, Borough and London Bridge Opportunity Area

75. The London Plan 2021 designates Bankside, Borough and London Bridge as one of twelve Opportunity Areas in Central London. It notes that this particular Opportunity Area holds considerable potential for intensification and scope to further develop its strategic office provision. This is reflected in Policy SD1(Opportunity Areas), which sets a target of 5,500 new jobs over the next 20 years.
76. Policy SP4 of the NSP states that most new development will happen in the Opportunity Areas and Action Areas, with Policy SP4 viewing them as the key locations for yielding new employment opportunities. Policy P30 of the Southwark Plan states that opportunity areas should evolve to incorporate new types of flexible business workspace and accommodate sectors such as the creative and cultural industries and the digital economy.

### Central Activities Zone (CAZ)

77. The site is located within the CAZ, which covers a number of central London boroughs and is London's geographic, economic, and administrative core. The London Plan, and in particular Policy SD1, recognises the well-established long term demand for office space within the CAZ and promotes office provision within this policy area.
78. Strategic Policy SP4 of the Southwark Plan recognises that the CAZ is 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.

### Bankside and Borough District Town Centre

79. As well as being within the CAZ, the site is part of the Bankside and Borough District Town Centre. The Southwark Plan sets out strategic targets over the next 20 years to deliver at least 460,000 square metres of new office space in CAZs and in town centres along with at least 84,000 new jobs. In the CAZ and town centres, Policy P30 of the Southwark Plan expects development proposals to retain or increase the amount of employment floorspace on site.

### South Bank Strategic Cultural Quarter

80. The application site lies within the South Bank Strategic Cultural Area. Strategic Cultural Areas have been designated in order to protect and enhance the provision of arts, culture and tourism uses. Development of the tourism sector has significant local economic benefits through employment, regeneration and visitor spending in other local businesses. While the proposed development does not include any visitor facilities the new and improved publicly-accessible spaces will be of value to visitors, and as such the designation and applicable policies are relevant considerations in the determination of this application.
81. The principle of redevelopment of the site for a new building to provide modern and fit-for-purpose office and retail uses would support the role and functioning of the CAZ and the Bankside and Borough District Town Centre. It is also consistent with the policies for the Opportunity Area and the NSP Area Vision, and in delivering new high quality publicly-accessible spaces in this area popular with tourists.
82. The conformity of the proposal with the adopted site allocation is discussed below, and thereafter the acceptability of each use is considered in turn.

### NSP Site Allocation NSP06

83. Together with the FT building located immediately to the west, the application site forms site allocation NSP06 under the Southwark Plan. Specifically with respect to land uses, the allocation requires redevelopment of the two sites to:
  - Provide at least the amount of employment floorspace (E(g), B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and
  - Enhance the Thames Path by providing public realm and active frontages with ground floor retail, community or leisure uses (as defined in the glossary); and
  - Provide new north-south green links; and
  - Provide new open space of at least 15% of the site area - 1,183m<sup>2</sup>.
84. The allocation sets out an expectation that new development should also deliver new homes (C3 class).
85. With regard to public space requirements, the allocation states that any redevelopment should provide a new link from Park Street to the Thames Path and improvements to the Thames Path. Redevelopment should also provide links to Cycle Super Highway 7 on Southwark Bridge Road.

### Assessment of conformity with site allocation

86. It is recognised that the proposal would not deliver any housing. Nevertheless, the development fulfils the 'must' requirements set out in the site allocation. It would re-provide and increase the quantum of employment floorspace (priority in the CAZ) on the site and provide the public realm improvements envisaged.

If housing were prioritised in the site allocation it would have stated that housing “must” be provided.

87. The application provides an uplift in office space of 11,261sqm GIA. The total floorspace uplift across all uses (i.e. office and retail) would be 11,933sqm GIA. This uplift of employment floorspace and the creation of a new restaurant and micro-retail units facing the Thames Path is consistent with the land use expectations of the allocation.
88. The scheme also provides the link from Park Street to the Thames Path. In total, the public realm area would be 1,930sqm (which excludes the central lobby and includes the colonnade areas). Together with the FT proposal this would exceed the 15% of the site area and in accordance with the site allocation requirements.
89. In summary, the proposed mix of uses responds appropriately to the objectives of the site allocation. The following section of this report assesses the mix of uses for conformity with the relevant policies of the adopted development plan.

#### Proposed uses

90. In order to support the vibrancy and vitality of the CAZ, London Plan policies SD4 and SD5 promote mixed use development, including housing, alongside increases in office floorspace. Policy SD5 is clear, however, that new residential development should not compromise the strategic functions of the CAZ. The Mayor’s Central Activities Zone SPG contains additional guidance on maintaining an appropriate mix of uses within the CAZ, setting out the weight that should be afforded to office use and CAZ strategic functions relative to residential.
91. Policy P30 of the Southwark Plan notes that the CAZ and Opportunity Areas as appropriate for accommodating the significant growth needed to meet business demand. Together, these policies require development proposals at the very least to maintain, but where possible increase, existing levels of business floor space to enhance the offer, vitality and long term vibrancy of central London.

#### Job Creation

92. The proposed scheme will deliver in the region of in the region of 6,654 new full time equivalent jobs in the first ten years of occupation. This include commitments to local employment and training initiatives, in the region of 880 jobs (or 88 full-time equivalent) through the construction process and over the construction phase, 10 years of estate management and 10 years of occupation.
93. The Council’s Local Economic Team (LET) advised that a development of this size and with the proposed employment densities would be expected to deliver 68 sustained jobs to unemployed Southwark residents, 68 short courses, and take on 17 construction industry apprentices during the construction phase. A development of this size and with the proposed employment densities would be

expected to deliver 214 sustained jobs for unemployed Southwark Residents at the end phase. The LET supports the application. If any of these expectations were not to be achieved, financial contributions would be sought in accordance with the Council's Planning Obligations and CIL SPD. An Employment, Skills and Business Support Plan would also be secured through the S106 Agreement.

#### Affordable Workspace

94. Policy E2 of the London Plan requires large-scale development proposals to incorporate flexible workspace suitable for micro, small and medium sized enterprises. Policy E3 deals specifically with affordable workspace. The policy states "In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose". The policy identifies the circumstances in which it would be appropriate to secure affordable space. Part B of the policy specifically identifies the CAZ as an important location for securing low cost space for micro, small and medium sized enterprises.
95. Policy P31 (Affordable Workspace) of the Southwark Plan includes a requirement for development proposing over 500sqm of employment space to include 10% of the proposed gross new employment floor space as affordable workspace on site. The affordable workspace should be secured for at least 30 years, respond to local demand and prioritise existing businesses.
96. The proposed development would deliver 28,596sqm of improved employment floorspace (office only in this instance and excluding plant). The applicant therefore proposes 2,860sqm of affordable workspace, equating to 10% of the total floorspace. This is located on the ground, first and part second floor of the building. The employment space has been designed to be flexible so that it could accommodate a range of different unit sizes and shared workspaces. Details of a specialist workspace provider could be secured through a s106 planning obligation. In addition, the S106 obligation regarding fit out discussed above would also apply to of the affordable workspace.
97. It is proposed to offer the affordable workspace at a discounted market rate, commencing at peppercorn rent and increasing incrementally to no greater than 75% market value, on the following basis:
  - 0-6 months – peppercorn rent
  - 7-13 months – 25% market rent
  - 14-23 months – 50% market rent
  - 24 months thereafter – 75% market rent
98. This would be secured over a 30-year period in accordance with Policy P31. The design and specification will be bespoke to suit the customer base and will aim to create an atmosphere conducive to start-up businesses. The spaces will target small and independent businesses from the local area, with a focus on new and start-up businesses that are vital to the future of Southwark's thriving

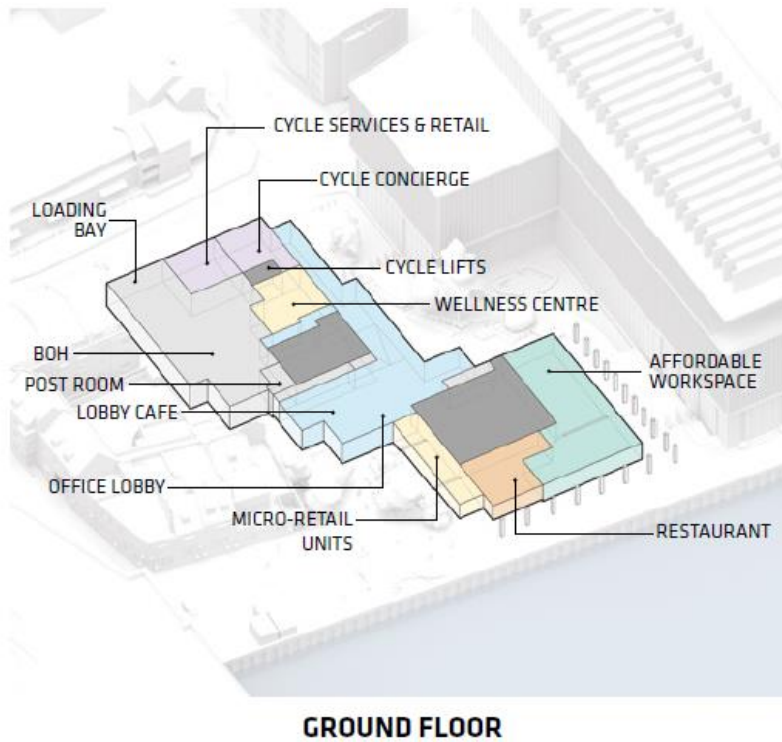
economy. The ground floor affordable workspace would partly be on the riverfront, benefitting from a prime active frontage. A large floor plate at first-floor level will provide flexibility and a variety of spaces to suit businesses at varying stages of growth, it will be fitted out to a Cat A specification and will have access to the cycle services. The LET and Officers support this approach.

99. The S106 Agreement will include a dedicated 'affordable workspace' schedule. This will ensure, among other things, that:
- the workspace is provided for a 30-year period at a peppercorn rent for months 0-6, and then the rest of the percentages as outlined above until the end of the affordable workspace lifetime at no more than 75% Local Open Market Rent for
  - equivalent space;
  - no more than 50% of the market rate office floorspace can be occupied until the affordable workspace has been fitted-out to the agreed specification ready for occupation;
  - a Full Management Plan and a Full Marketing Strategy, both to be secured in advance of the marketing period and first operation of the workspace;
  - the service charges payable by the tenant will be capped; and
  - the rates payable by the tenant will be capped.

#### Retail uses

100. Policy SD4 of the London Plan sets out a strategic priority to support the vitality, viability, adaption and diversification of Borough and Bankside, as a CAZ Retail Cluster, through retail and related uses. Together, policies E9 and SD7 of the London Plan 2021 provide support for essential convenience retail and specialist shopping in District Town Centres.
101. Policy P35 of the NSP sets out retail requirements in the context of the evolving role of District Town Centres, requiring new development to provide an active use at ground floor level in locations with high footfalls. The NSP site allocation NSP06 expects any development of this site to provide town centre uses on the Thames Path.
102. To the northeast of the development, micro-retail units and the double height entry of the restaurant provide high quality retail space at the corner of the new 'Bankside Square.' Much of this would front the Thames Path. The southern location of a new Cycle Services and Active Travel Hub animates the Park Street facade and serves building occupiers and visitors alike. The Active Travel Hub provides repair, retail and a concierge services- where visitors will be able to drop off their bike and have it parked for them. This accords with development plan policies and aspirations for the area, and as such is considered a benefit of the scheme.

**Image: Ground floor uses and layout**



**Image: View of development from the Thames Path**





**Image: Micro retail units facing Bankside Square**



## **Design considerations**

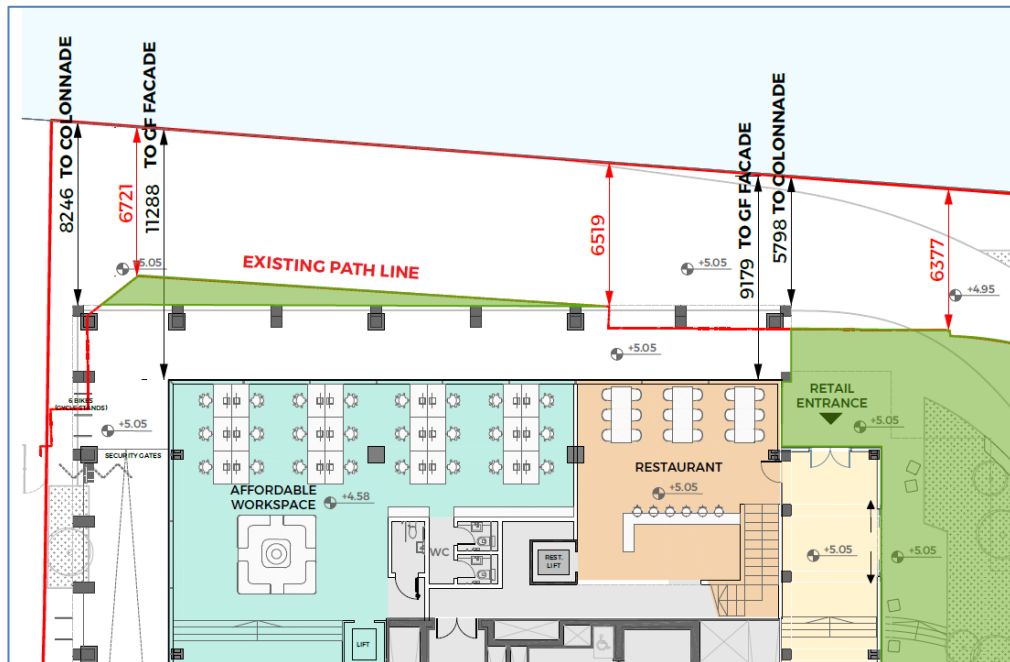
103. The NPPF stresses that good design is a key aspect of sustainable development and is indivisible from good planning (paragraph 124). Chapter 3 of the London Plan seeks to ensure that new developments optimise site capacity whilst delivering the highest standard of design in the interest of good place making. New developments must enhance the existing context and character of the area, providing high quality public realm that is inclusive for all with high quality architecture and landscaping. Policy HC1 advises that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail. The importance of good design is further reinforced in the Southwark Plan Policies P13 and P14 which require all new buildings to be of appropriate height, scale and mass, respond to and enhance local distinctiveness and architectural character; and to conserve and enhance the significance of the local historic environment. Any new development must take account of and improve existing patterns of development and movement, permeability and street widths; and ensure that buildings, public spaces and routes are positioned according to their function, importance and use. There is a strong emphasis upon improving opportunities for sustainable modes of travel by enhancing connections, routes and green infrastructure. Furthermore, all new development must be attractive, safe and fully accessible and inclusive for all.

## Site layout

104. London Plan Policy D3 requires developments to make the most efficient use of land to optimise density, using an assessment of site context and a design-led approach to determine site capacity. This design led approach is also reflected in Southwark Plan Policy P18. In respect of site layout and public realm Southwark Plan Policy P13 requires developments to ensure that the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths; to ensure that buildings, public spaces, open spaces and routes are positioned according to their function, importance and use to ensure that a high quality public realm that encourages walking and cycling is safe, legible, and attractive is secured. The detailed design of all areas of public realm must be accessible and inclusive for all ages and people with disabilities as well as providing opportunities for formal and informal play and adequate outdoor seating for residents and visitors.
105. The proposal is an improvement in terms of its urban design at grade, with more activated and animated frontages. It responds to the shift in geometry of the riverside walk and creates a new entrance courtyard space open to the public, which are obvious improvements over the current. The geometry of the proposed building is similar to the existing and allows the gaps between the site and FT building and the Anchor Pub to be maintained. The layout of the scheme has been designed to allow for the public spaces to be provided and improves movement and permeability as envisaged in the Site Allocation. Further detail is discussed in the landscaping section, but it is considered that all areas of public realm would be accessible and inclusive for all ages and people with disabilities.
106. The development would step the main front building line back from the existing and introduce 3m deep colonnade which is available for pedestrian access and circulation. The GLA had commented in their Stage 1 report that the alignment of the northern edge of the building protrudes closer to the river wall than the FT Building proposals, yet the alignment of the river wall is not parallel and therefore the proposed pedestrian route is considerably narrower within the Red Lion Court site. They also commented that the 3m deep colonnade appears to include primary structural columns (of notable dimensions), entrance doors and potentially outdoor seating associated within the restaurant tenancy. As such, there is potential for a net reduction in the width of Thames Path in this location.
107. The applicant has submitted an updated Design Note, which clarifies the site layout and how the building would provide a slightly widened Thames Path. The applicant also proposes the reduction of the columns along the colonnade to improve that circulation width. The proposal widens the Thames Path in all locations except for two columns at the colonnade. There would be small

sections of the Thames Path which are intended to be stopped up in order to facilitate the redevelopment. This would be public highway maintainable at private expense. The stopping up process would be managed under a separate process post planning permission.

### Plan: Thames Path frontage existing Vs proposed path line



### Image: Current condition – approach from the east



**Image: Proposed condition - approach from the east**



108. At the 'rear', it sufficiently engages with the street, as well as just about opening up the route to the new shared central garden, with its curved form suggesting an onward route through.

### **Height scale and massing**

109. London Plan Policy D9 deals with tall buildings. The policy sets out a list of criteria against which to assess the impact of a proposed tall building (location/visual/functional/environment/cumulative). London Plan Policy D4 requires that all proposals exceeding 30 metres in height and 350 units per hectare must have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny.
110. Southwark Plan Policy P17 deals with tall buildings. The policy sets out a list of requirements for tall buildings of which the policy states that tall buildings must:
1. Be located at a point of landmark significance; and
  2. Have a height that is proportionate to the significance of the proposed location and the size of the site; and

3. Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and
  4. Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and
  5. Respond positively to local character and townscape; and
  6. Provide a functional public space that is appropriate to the height and size of the proposed building; and
  7. Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate.
111. The Southwark Plan notes that the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. It goes on further to say that the design of the development should respond to its prominent, yet sensitive setting as an arrival point into Southwark from Southwark Bridge. Redevelopment must be sensitive to the Thames Policy Area, where building heights should be lower in close the proximity to the River Thames.
112. In terms of massing, it is larger and taller than the existing building. The height would increase from 38.79m to 46.7m (maximum). This scheme followed extensive negotiation and discussions with the applicant to reduce the mass and scale. The building proposes a series of terracing around the facades to break down the scale. Importantly, it responds to the emerging shoulder line along Park Street to the 'rear' and provides a shoulder line to the front that initially responds to the FT building, stepping upwards and away. It is noted that the building would appear larger next to the Anchor Pub and when seen from the north side of Southwark Bridge Road. This will be discussed in the Heritage section of this report.
113. The applicant has made effort to minimise the impact on the listed public house by stepping further away. Furthermore, the building transitioned from being composed of seven 'blocks' to eight. The 8-block massing breaks down the closest blocks to the pub from two to three. The whole scheme is pulled back further and opens widely around the pub terrace, improving the relationship to the terrace's turret element. The lowest blocks move southwards, away from the rear of the pub. The whole front face of the closest massing block was retracted. Furthermore, the central portion of the proposed development is lifted, freeing up the ground plane and relating in height to the Anchor Pub. This lifted mass provides the two new publicly accessible spaces linked together by the building's lobby.



**Image: 8 block massing**

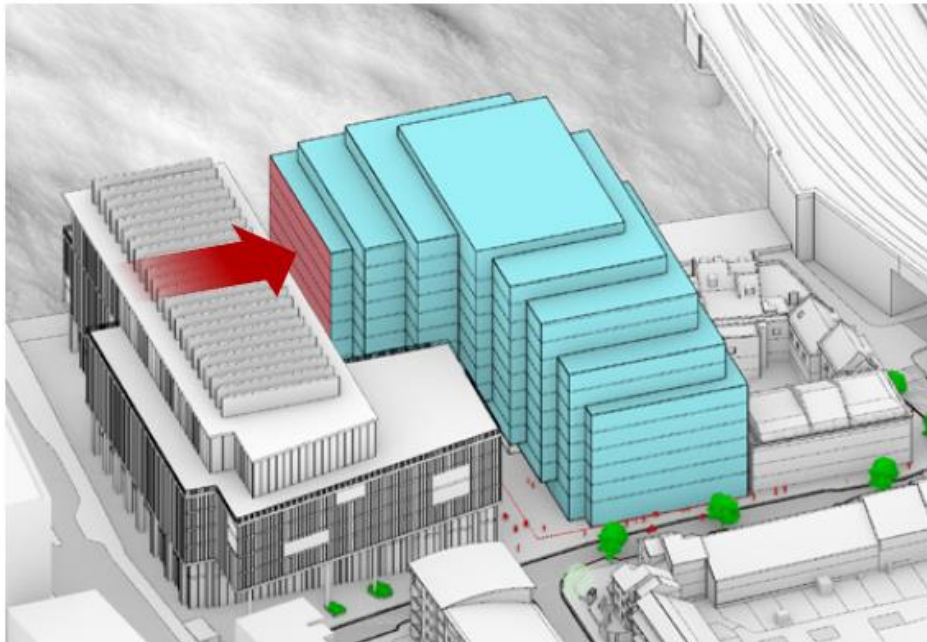


**Image: View of development from river – simpler grid system**



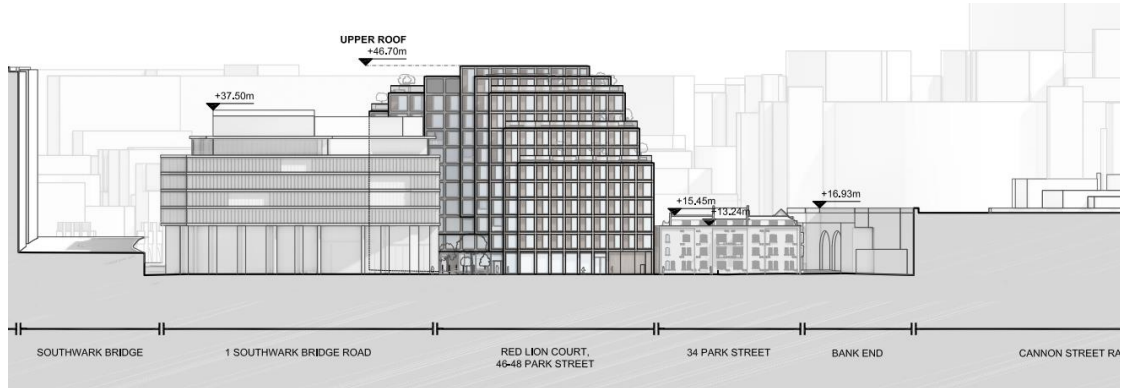
114. At the north the proposed development steps up to address the larger scale context of the former FT Building and the larger scale commercial context of the Bankside and the City cluster across the River Thames. In previous proposals before submission, discussions were also had regarding the gap between the proposed building and the FT proposal. Consequently the whole western façade in this zone receded by 1m. On the lowest two floors a double height colonnade creates further width for users of the public realm. The space is approximately 11.9m width in the colonnade and 7.5m on the upper levels.

**Image: Massing set back further from FT building**

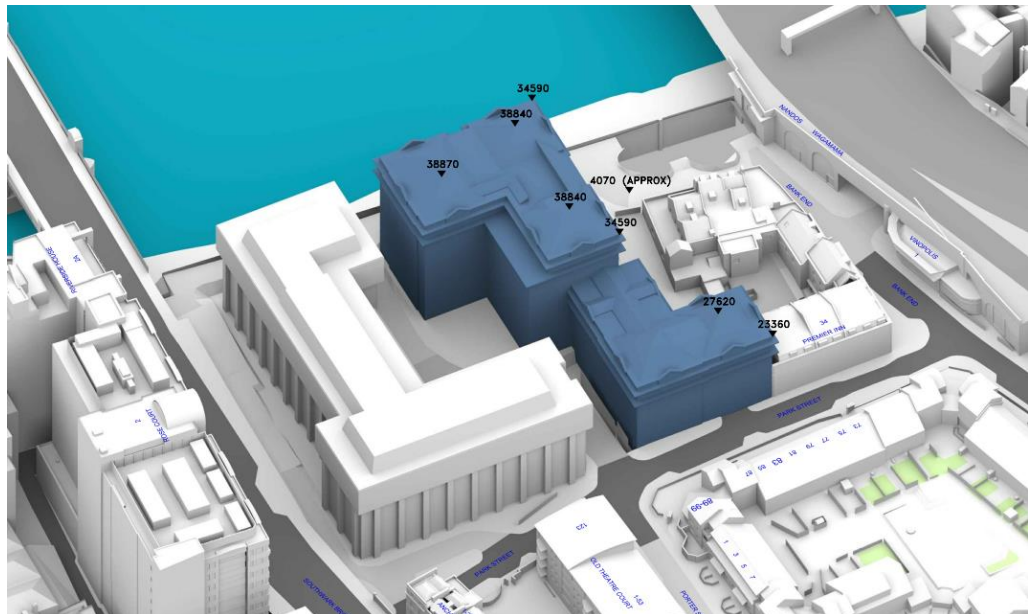


115. At the south the proposed development steps down to correspond to its context along the Park Street elevation and in relation to the residential scale of the townscape. It would be 6 storeys (26.5m AOD) on the Park Street (south) elevation – a slight increase from the existing Red Lion Court building. The context elevation and 3D models illustrate the change in the scale on the Park Street frontage. Whilst the proposed building would be much larger in mass and scale, it should be noted that the Site Allocation expected this site to expand in floor area and that can only be possible with some height. Southwark needs to accommodate significant growth for offices and other workspaces which are growing in demand contributing to the central London economy and status as a world city. The Site Allocation NSP06 emphasises that sites that are within the Central Activities Zone are most in demand for delivery of offices and will be required to contribute to this growth by providing an increase in the amount of employment floorspace.

**Drawing: Section drawing looking north**

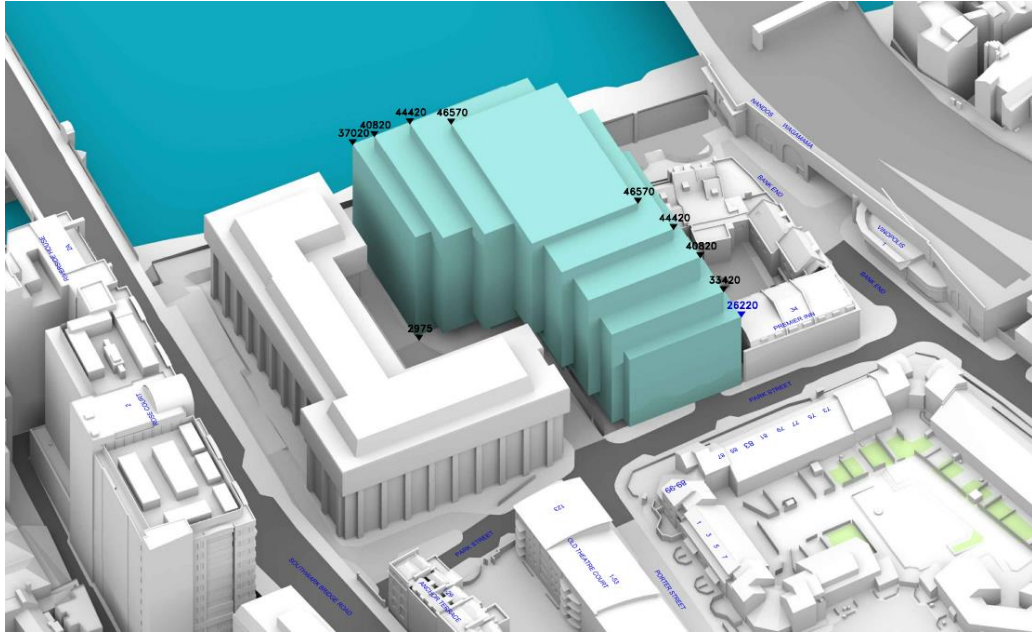


**Image: Existing building massing**





**Image: Proposed massing**



**View: South of the site, from Porter Street**



116. Overall, it is considered that whilst there is a step change in the scale and height on this site and along this frontage, the articulated massing and break down of the facade would give the appearance of a lighter form. Further analysis on the protected views is discussed in the heritage section of this report.

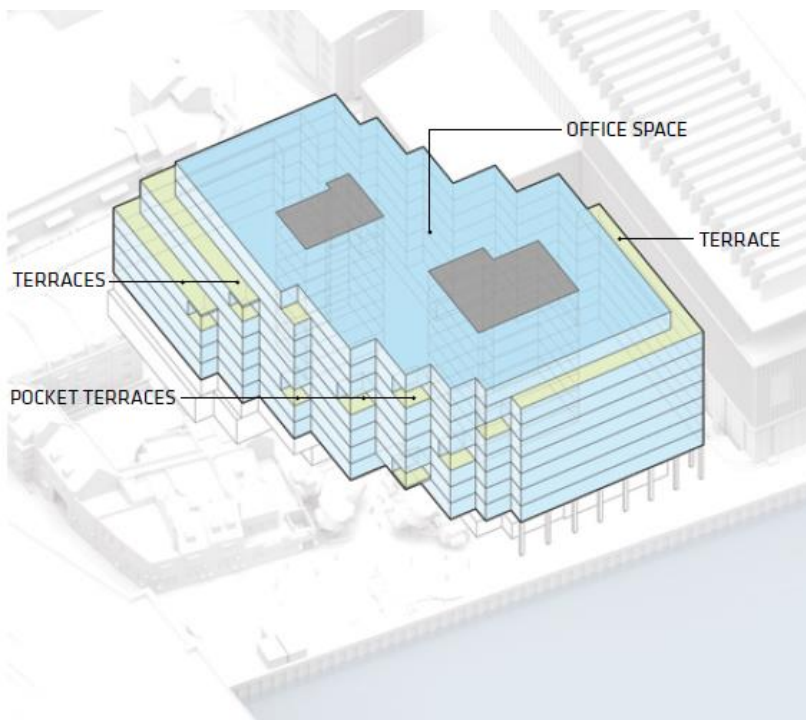
## **Architectural design and materiality**

117. Southwark Plan Policy P14 sets out the criteria for securing high quality design. In respect of architectural design and materials the policy requires all developments to demonstrate high standards of design including building fabric, function and composition; presenting design solutions that are specific to the site's historic context, topography and constraints; responding positively to the context using durable, quality materials which are constructed and designed sustainably to adapt to the impacts of climate change.
118. The proposed massing has been conceived as a series of eight adjoining volumes that rise and fall across the site. This design concept lifts the mass at the northeast corner to create an area of public realm beside the neighbouring Anchor pub.
119. This results in a stepped profile and is accentuated by a series of terraces, which rise and fall across the top of the building. Those terraces would be animated with planting, softening the rectilinear expression of the architecture. The outer grid of the building would be composed of modules constructed off-site. Pocket terraces have been cascaded along the eastern and western façades, introducing greenery and interest in the elevations. The pocket

terraces, distributed roughly two per floor, add further depth to the facade on the largest flanks. The eastern elevation is further broken down in scale by the wrapping around of the main roof terraces.

120. The proposed volumes will be arranged in a rhythm, stepping up more steeply to the north, with shallower single storey terraces, and cascading down more gently to the south and east, with deeper terraces set at every two floors. This will result in a lower shoulder height and more visible stepping composition to the south and east where the scale of nearby buildings is lower on Park Street. To the west, the height of the lowest volume will relate more to the height of the redeveloped FT building and will gesture down to the four storey Premier Inn and residences to the east and south. The riverfront elevation will have large expanses of glass – maximising visual permeability but also responding to the northern aspect of that elevation – whilst the east and southern elevations will have inset metal panels, the breadth of which will be patterned to give the building greater opacity to the south and east.

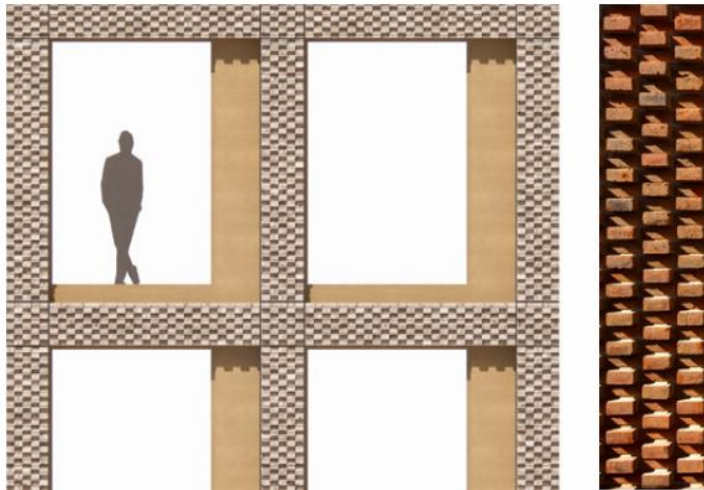
**Image: 3D massing showing terraces**



121. The composition of the scheme fundamentally has a masonry grid that is consistent across the building. The outer grid will be in light coloured brickwork, in response to the predominant material locally and industrial heritage of the site, but with slender proportions and the joints between the modules expressed to acknowledge the 21st century construction of the building. There is also a secondary material proposed - the inset metallic panels will have a warm tone and will be arranged to provide shading, privacy, visual interest.

122. During the pre-application stage, Officers had wanted to see more texture and detail in the façades. The design team have studied various methods to re-introduce craft within the existing parameters of the façade design. These included variations in how the bricks are laid, all of which introduce some three-dimensionality and will enliven the masonry surfaces with light and shadow throughout the course of the day. This detail can be secured as a condition.

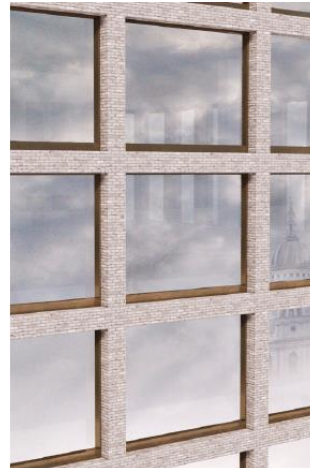
**Image: Texture and detail in bricks and metal for the infill panels**



**Image: Grid pattern and façade detail differences**

South (metal panels)

North (no metal panels)



123. There would be suspended soffits where the massing is lifted. It is envisioned the soffits continue the material language of the main façade, with a simple brick frame and a warm metal infill panel. However, the warm metal infill will be more reflective and have a playful lighter quality.



**Image: Soffits**



124. It is considered that the architecture has a very strong rigour with its very regular grid, repeated stepped form, and quasi-symmetry. The elevations at this stage are well detailed. It is considered that more could be added to ensure that the front entrance is more legible, but this the landscaping and public realm detail could guide occupants and visitors. Overall, its architecture is bold, but generally sits well within the wider townscape and protected views.

### **Heritage considerations and impacts on protected views**

125. 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”.
126. Chapter 16 of the NPPF contains national policy on the conservation of the historic environment. It explains that great weight should be given to the conservation of heritage assets. The more important the asset, the greater the weight should be (paragraph 199). Any harm to, or loss of significance of a designated heritage asset should require clear and convincing justification (paragraph 200). Pursuant to paragraph 201, where a proposed development would lead to substantial harm or total loss of significance of a designated heritage asset, permission should be refused unless certain specified criteria

are met. Paragraph 202 explains that where a development would give rise to less than substantial harm to a designated heritage asset, the harm should be weighed against the public benefits of the scheme. Paragraph 203 deals with non-designated heritage assets and explains that the effect of development on such assets should be taking into account, and a balanced judgment should be formed having regard to the scale of any harm or loss and the significance of the asset. Working through the relevant paragraphs of the NPPF will ensure that a decision-maker has complied with its statutory duty in relation to Conservation Areas and Listed Buildings.

127. Development plan policies (London Plan Policy HC1 and Southwark Plans Policies P19, P20 and P21) echo the requirements of the NPPF in respect of heritage assets and require all development to conserve or enhance the significance and the settings of all heritage assets and avoid causing harm.
128. Policies HC3 and HC4 of the London Plan identify the strategic views within London and set out the assessment framework for development that will impact upon strategic views, protected vistas, and their landmark elements. Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of strategic views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and appreciate Strategically Important Landmarks. Guidance on the management of designated views is set out within the London View Management Framework (LVMF) SPG.
129. Policy P22 of the Southwark Plan states that development should:
  1. *Preserve and where possible enhance the borough views of significant landmarks and townscape;*
  - and*
  2. *Ensure the viewing locations for each view are accessible and well managed;*
  - and*
  3. *Enhance the composition of the panorama across the borough and central London as a whole.*
130. As noted earlier in the report, the site is situated within the following protected views:
  - Local View 1: The London panorama of St Pauls Cathedral from One Tree Hill;
  - Local View 2: The linear view of St Pauls Cathedral from Nunhead Cemetery;
  - Background Assessment Area of the LVMF view 1A.2 - Alexandra Palace Viewing Terrace to St Paul's Cathedral; and
  - Background Assessment Area of the LVMF view 3A.1 - Kenwood Viewing Gazebo to St Paul's Cathedral.
131. The submission includes a Zone of Visual Influence map (ZVI) and a townscape visual impact assessment (TVIA) that provides verified images of the development when viewed from a number of locations in and around the Bankside area, as well as when viewed from within the relevant protected

panoramas and river prospects. The set of verified views is reasonably extensive, providing images from 23 locations, including 1 night-time image. A further 19 model shots are provided, showing additional locations and sequences of views.

132. The TVIA provides baseline conditions, the proposed view and cumulative scenario. Cumulative assessment has also been carried out and considers schemes in the local and wider area that are consented or have resolution to grant consent and that are likely to have a perceptible effect in combination with the proposed development. The applicant had undertaken a number of views, but Officers have focussed on the above protected views. In general, despite being c.45m tall, the development is less widely visible than its height suggests. This is in part due to the similarly large buildings located nearby, particularly to the west, but also due to the railway viaducts that run to the east and southeast of the site and the often dense, built-up form or irregular layout of the surrounding streets. The moderately tall structure is often obscured by the intervening context.
133. The ZVI indicates the building will be visible along the riverbanks nearby and in the middle distance, although mainly on the north side of the river, and from Blackfriars Bridge and onwards along Farrington Road. It would also be highly visible from the elevated mainline railway running into Cannon Street station. It would be visible from the adjacent bridges both upstream (Millennium) and downstream (London Bridge) and to a lesser extent from Blackfriars rail bridge and Tower Bridge. It will be particularly visible in the streets to the immediate south (Park Street, Porter Street and Old Maiden Lane) due to proximity and the low-rise scale of the neighbouring Park Street housing estate.
134. Beyond this, visibility of the site is sporadic, where the local townscape of the viewing point briefly opens up. In those instances from the southwest, south and southeast, the middle and long distance views generally would be glimpsed views of the rooftop with the layering of other buildings in the foreground and read as one of several large-scale buildings within the Bankside area. The impact of the glimpsed views would be minor and, given the often mixed character or quality of the local townscape, unlikely to be harmful. Nonetheless, it does remain visible in a number of nearby and more distant views, where it potentially affects protected views, the settings of designated heritage assets, and other sensitive townscape views.

#### Protected Views

135. LVMF view 1A.2 - Alexandra Palace Viewing Terrace to St Paul's Cathedral  
Under this view, the proposed development would not be visible. It would be fully hidden by the terraced houses in the foreground. There would be no effect in the proposed and cumulative conditions.
136. LVMF view 3A.1 - Kenwood Viewing Gazebo to St Paul's Cathedral  
In the proposed scenario, a sliver of the top of the proposed development would be visible to the right of the western towers of St Paul's Cathedral. It would not be visible in the wider view. It is unlikely to be noticed due to the considerable

distance of the viewpoint, the small amount which is visible and its appearance beyond existing large-scale buildings on the skyline. It would have no noticeable effect on the setting of St Paul's Cathedral. Consequently, the scale of effect is judged to be negligible and the nature of the effect would be neutral.

137. Likewise, in the cumulative scenario, due to the very minor degree of its visibility and also due to the prominence of the consented tall development seen directly beyond it the cumulative effect is judged to remain the same as the proposed development in isolation.
138. Local View 1: The London panorama of St Pauls Cathedral from One Tree Hill  
The London Panorama view from the summit of One Tree Hill provides one of the best views of central London and its suburbs from one of Southwark's highest public open spaces. St Paul's Cathedral is the strategically important landmark that is the focus of the view. It is noted that the foreground foliage presently obscures the Cathedral, but the silhouette of its dome and spire is discernible.
139. The proposed development would be in the foreground of the Cathedral and its upper levels conceal a small portion of the southern elevation of the Cathedral. However it is entirely set beneath the Threshold Plane defined in the Southwark Plan for the view. The applicant notes that the Threshold Plane, as defined in the Southwark Plan, allows for further concealment of that lowest part of the Cathedral which has limited visibility and significance in the view. The proposed development is set below the landmark parts of the Cathedral. In the telephoto view, where the proposed development is visible, the stepped volumes of the proposed massing and the light-coloured brickwork reduce the presence of the proposed development in the view. As it blends with existing layers of urban development in the foreground of St Paul's, it is not likely to be seen by the naked human eye. The magnitude of impact would be negligible and the Cathedral would remain the focus of the view. The nature of the effect is judged to be 'neutral' because the proposed development will preserve the view and the viewer's ability to recognise and appreciate St Paul's Cathedral within the wider panorama.
140. In the cumulative scenario, there would be change to the view overall as a result of the number and scale of consented developments in the view. However, the consented schemes which appear near to the proposed development in the view would be set lower on the skyline and are not likely to be noticed, due to their position within a part of the view already characterised by dense layers of rooftops. The cumulative effect is therefore judged to remain the same as the Proposed Development in isolation.
141. Local View 2: The linear view of St Pauls Cathedral from Nunhead Cemetery  
The view is from within the Grade II\* Registered Nunhead Cemetery and outward views from this part of the Cemetery are fully screened by mature trees which dominate almost all of the Cemetery. The view provides a tight, focussed view of St Paul's Cathedral from one of Southwark's most historic locations that is fully framed by mature trees. St Paul's Cathedral is set prominently in the centre of the view.



142. The proposed development would appear in the foreground of the body of St Paul's, set well beneath the western towers and the dome and peristyle of the Cathedral. All the key features of the Cathedral identified in the policy would all remain clearly visible. As in the view from One Tree Hill, only the upper levels of the proposed development would be visible and they would be seen as part of the existing layers of urban development in the foreground of St Paul's. The stepped volumes of its mass will soften its presence in the views and will accommodate greenery on its terraces. The brick-clad outer frame will be light in colour and slender in appearance, also reducing its prominence in the view. It is considered that the development would not appear intrusive, unsightly or prominent in the view. Whilst it would obscure a small part of the body of the Cathedral, the full silhouette of the Cathedral and its western towers would remain visible and it would be fully set beneath the Threshold Plane defined in the Southwark Plan. The viewer's ability to recognise and appreciate St Paul's Cathedral will be fully preserved. To conclude, the scale of the effect would be minor and the nature of the effect would be neutral. There would be no added effect in the cumulative condition so the effect would be the same as for the proposed development in isolation.
143. Regarding the river prospects, the submitted ZVI confirms that the replacement building would not be seen from upstream in the protected views from Waterloo Bridge (LVMF 15.B) and the Southbank (LVMF 16.B) or beyond, being obscured from view by intervening buildings. Similarly, the development is unlikely to be seen from Blackfriars Bridge and only marginally visible from Blackfriars Station/ rail bridge, albeit the river prospects from here are not designated as protected views. Nonetheless, the townscape impact is considered neutral.
144. The views from Southwark Bridge towards the development, which is a protected river prospect (LVMF 12.B.1) is the most overt riverside view of the development. The protected view is panoramic, with a focus on Southwark Cathedral, although the development would sit beyond the edges of a viewing cone towards the cathedral. The impact would be on the stretch of riverfront generally between Southwark Bridge and Cannon Street station railway bridge. Overall, the townscape impact is moderate and of some harm, the key issue being the adjacency of the listed public house. Many of the other views not outlined above, but which are key river prospects have been analysed and it can be summarised that the impact would be neutral.

**View: Southwark Bridge: downstream**



**View: Southwark Bridge south**



145. Overall, the new building has no or little impact on the long distance protected views and river prospects. Where visible in closer-by river prospects and townscape views, it has a minor or moderate effect, with its architecture having generally a modestly positive effect on the townscape.

### Heritage Assets

146. The ZVI confirms that the development would not affect views from within Parliament Square and therefore would not affect the settings of the Palace of Westminster and Westminster Abbey a World Heritage Sites. It would be visible from the Tower of London, although this would be limited to the ramparts of the Outer Curtain Wall and adjacent riverwalk (part of the Liberties), where it would be seen in the distance as one of many large riverfront buildings and therefore have a neutral impact. Importantly, it would not affect the significant views from within the castle grounds (Inner Ward) and the forecourt to the White Tower and scaffold site in particular.
147. Whilst the site is close to the site of the original Globe and the development involves basement extensions, it would not affect the theatre ruins, which are subterranean and located beneath the neighbouring Anchor Terrace in Park Street. In terms of the remains of Winchester Palace in Clink Street, the views submitted demonstrates that the proposed replacement Red Lion Court building would not be visible in the backdrop to the scheduled monument, being obscured from view by the existing building context of Clink Street.
148. Regarding listed buildings and structures, the closest are several Grade II listed canon bollards in Bank End, adjacent to the Anchor Pub and railway viaduct. The development would not affect the settings of the bollards, which comprises the street form and groundscape of Bank End, which are unaltered.
149. The heritage asset mainly affected is the Anchor pub itself, which is Grade II listed and is experienced as a traditional corner public house on the Thames foreshore within a built-up section of central London. Its significance derives from its surviving architecture and its historical interest, being a longstanding riverfront pub with a close association with the former Anchor brewery that occupied much of the adjacent area, and its group value with the nearby anchor Terrace. Its riverfront setting is part of the pub's large popularity among visitors to the area. The existing Red Lion Court and nearby FT building impact upon its riverfront setting, jutting forward of the existing pub and truncating Bankside as a former roadway.
150. Whilst the stepped footprint and cantilever of the replacement building set the building slightly westwards from the public house, it does not alter the relationship within the street scene onto the remaining Bankside highway and the pub's relationship to the riverfront itself. The replacement building is however significantly larger, rising higher and more significantly stepping rearward, with its silhouette overwhelming the diminutive corner pub, which would no-longer be partly seen against the skyline. This is considered detrimental, although towards the lower range of less than substantial harm.
151. In the proposed development, whilst the stepped form can be read, the juxtaposition becomes more abrupt. The silhouette of the pub is unchanged and its impact on its heritage setting neutral, although the townscape condition is uneasy and regarded as moderately harmful. The replacement Red Lion Court would no longer appear coming to ground, but seen to climb above the

pub. The impact, however, is to the pub's pastiche extension rather than the more significant, historic elements of the pup, with its riverfront setting remaining unaffected, and is therefore a matter of townscape harm, with the impact on the heritage setting remaining neutral.

152. Moving southwards, only the foremost volume of the replacement building is seen, which by comparison is taller but not so wide as the existing Red Lion Court building. In this oblique view, the layered form is seen at roof level only, with the new building read coming to ground and calmer in appearance. Importantly, its reduced footprint reveals more of the adjacent pub, with its modern side extensions more visible. In this instance, there is an improvement to the sense of its riverside position, albeit the impact is distinctly minor and more a case of a townscape improvement, with the new architecture an obvious enhancement of the view.
153. Southwark Bridge itself is Grade II listed and therefore is a matter of focus, its significance being its architecture and historical interest as an example of early 20th century riparian infrastructure and group value with other listed Thames bridges. Whilst the proposals being a marked change in the form and appearance of the application building, overall its setting characterised by the riverwalk and immediate backdrop of large commercial buildings at its bridgehead remains. The impact on the heritage setting similarly remains neutral further south along the bridge.
154. The other key heritage asset in the immediate locality is Anchor Terrace, the Grade II listed former brewery offices. The terrace is located further to the west of Red Lion Court and is mainly viewed within the context of Southwark Bridge Road and its approach to the bridgehead. Its significance is as a surviving Georgian terrace with a high compositional form, its historical association with the riverside brewery and group value. Only parts of the roof of the existing Red Lion Court are visible in the backdrop to the rear of the terrace. Whilst the upper floors of the replacement building would be much more visible, the wireline indicates that the building would remain to the rear and would be set much lower than the terrace, where it would read as part of a layered backdrop. Its modern design would offer visual interest, but not to the extent of being disruptive. The terrace's street elevation and compositional form would be unaffected, as would its historical association and group value. Overall, the impact would be neutral.
155. In terms of other listed buildings within the wider context, the building of highest significance is the Grade I listed Southwark Cathedral, which is over 250m eastwards from the site, but is notable in the raised view from the bridgehead of Southwark Bridge over Park Street. The replacement building will be seen within the foreground in the vista towards the cathedral. Though taller than the existing Red Lion Court, the replacement building will maintain the current building line and would initially continue the height of the extended FT building before stepping down to a similar height to the modern building opposite, maintaining a balanced enclosure to the view. Though more glazing would be apparent, the architecture would remain calm and not strident in this view, and would have a neutral impact on the appearance of the heritage asset.

156. In terms of other listed buildings in the vicinity, as referenced above, the dense built up character of Clink Street obscures the development when seen within the street setting of the Grade II listed Winchester Wharf.
157. The development is more evident in the backdrop to the Grade II listed terrace houses in Park Street at Nos. 20-24, appearing on the skyline in the same location as the current building, though notably taller. Nonetheless, it would remain at a sufficient distance not to dominate or disrupt the setting of the terrace, with the Georgian townhouses and their fine architectural detailing remaining primarily in the view. Similarly, there would be no impact on the setting of the further Georgian townhouses at Nos. 21 and 23 Park Street or nearby at Cromwell Flats, 5-8 Redcross Street, which are Grade II listed Victorian philanthropic housing with shops. The development would also be visible in the backdrop to the Grade II listed Georgian terraced housing of No.55-59 Thrale Street, though again, the development would appear on the skyline at a sufficient distance not to dominate or disrupt the setting.
158. Lastly, the application site is outside a conservation area. It is close by to the Borough High Street conservation area and Thrale Street conservation area. The significance of the conservation areas is generally the historic street patterns and traditional scale and architecture, comprising mainly mid-rise warehousing and commercial offices, ecclesiastical buildings and occasional low-rise residential buildings, with little or no public open space. Within these conservation areas, the street pattern and dense urban form generally restrict outward views towards the site, with the intervening distance and building context further limiting any impact.
159. Elsewhere, due to the intervening distance, built up context and/or orientation of the street pattern, the development would not be seen in outward views from the Bear Street conservation area and only marginally glimpsed on the skyline from the Tooley Street conservation, which sit further away to the west and east of the site, preserving their setting
160. Overall, for the most part the development has a neutral or occasionally beneficial impact on the local townscape, its high architectural quality being evident in close and middle distance views. The building will form a notable and engaging riverside development, and though larger than the current building, its layered form will generally mediate well its sense of scale, stepping down towards the riverfront and Park Street at the rear.
161. The development has little or no impact on strategic views and where seen, generally a neutral or modestly positive impact on the settings of nearby listed buildings and structures, and a neutral impact on the settings of surrounding conservation areas. The notable exception, however, is in Bank End and its relationship to the neighbouring Grade II listed Anchor pub, where its form and scale form a strong juxtaposition to the diminutive heritage asset, detracting from its setting. The impact is less than substantial harm and, in accordance with the NPPF, should be balanced against the planning benefits of the scheme.

### Design Review Panel

162. The proposals were reviewed by the Council's Design Review Panel (DRP) at the pre-application stage in January 2022. The scheme was generally welcomed by the panel.  
The panel acknowledged the positives of the scheme in working within the height constraints of the protected viewing plane; the strong design aspiration of animating the ground floor; and stepped massing to break down the scale of the building and provision of outdoor public space and green terraces.
163. The panel, however, felt that the quantum of development proposed was compromising key aspects of the design. The stepping of the building at the upper levels such that it projects over the public realm to the north and south of the building feels overbearing and compromises the quality of these spaces. The relationship to the listed pub feels unresolved and the panel felt that the massing needed to be set back to give the pub more breathing space. The air gap between the FT building has been reduced at the upper levels which will compromise the quality of light for both buildings. Too much development is being asked of the site, impacting on its neighbours, its quality of workspace and the quality of the new open spaces.
164. The applicant has made minor amendments to respond to the DRP comments. These include reassessing the blocks and massing, the landscaping and public realm and pulling back from the neighbouring buildings. The detailed architecture, elevational treatment and materiality have also been further explored. Officers are satisfied with the adjustments made.

### Secure by Design

165. Policy D11 of the London Plan 2021 require development proposals to reduce opportunities for crime and create and maintain safe internal and external environments.
166. The Metropolitan Police Design Adviser had commented on the scheme and it was noted that the designers have considered security and crime prevention measures, and believe that this will result in a positive impact upon the development from a safety and security perspective. Continued liaison with a designing out crime officer will enhance this. The design of the development has considered opportunity for natural surveillance, incorporates excellent lines of site and the development should 'activate' this area. The design adviser also provided comments on the landscaping and these comments will be taken on board when landscaping details are submitted for approval.  
Advice on accessibility within the building is also provided. The Police design adviser is confident that certification can be attained. To ensure certification is ultimately achieved, the imposition of a 'Secured by Design' condition is recommended.

## **Landscaping and biodiversity**

167. The proposal would deliver a number of public realm benefits and plays a major part in the delivery of the site allocation aspirations. The Thames Path would be widened and would open up a route between Park Street and the Thames Path for the public.
168. Additional open space is proposed on the west side of the building, with the gardens and route through to the Thames Path made available to the public during the daytime. This open space would offer attractive soft landscaping and street furniture in a contemporary design. Outside of the hours of public access, metalwork gates would provide closure to the open space. The gates are put in place to provide a level of protection towards the residential areas and is a feature that is expected by the local residents. It is expected that the location of the security gates proposed match the security gates and proposed closed times of the neighbouring site (open only between 8am to 8pm to the public). The final detailing of the gates and hours would be secured by condition.
169. The site allocation aspirations was to a north-south pedestrian link created. Due to the different site ownerships, it was anticipated that this would be delivered in two halves. The FT building development proposed the pedestrian route flanking the common boundary, which sets up opportunities for any development on the Red Lion Court land to create an adjacent green space or new secondary pedestrian routes off.



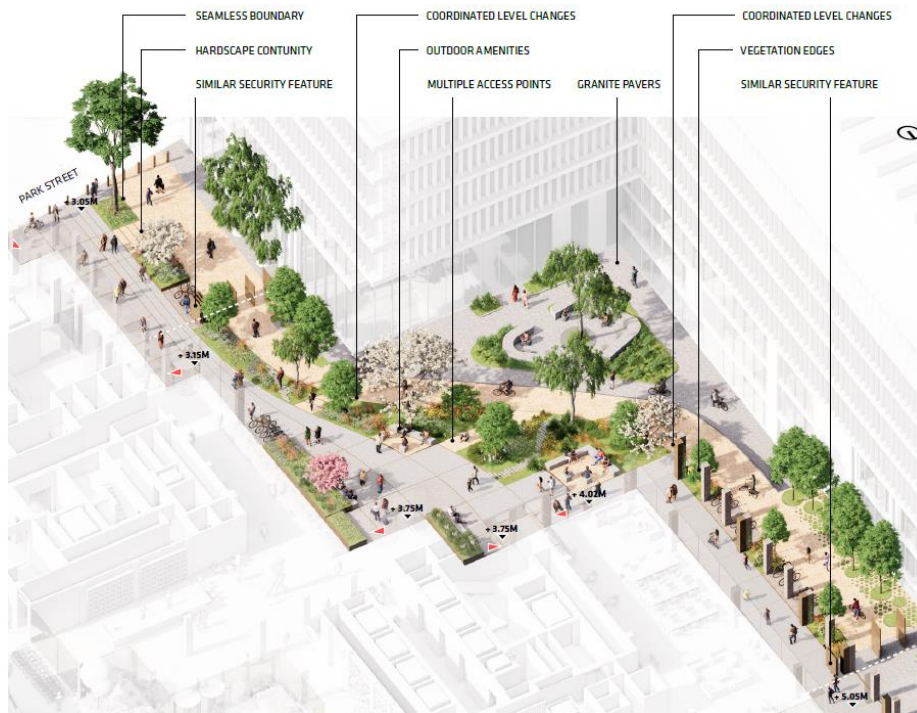
## Plan: Approved FT proposal ground floor



170. When the two schemes come forward, it is envisaged that this would appear as one larger public space, which would be unified. Details of the hard landscaping and levels would be secured via a condition and a public realm specifications would also be required in the s106 agreement (similar to the FT permission).



**Image: Future public space when both developments complete**



171. The s106 associated with the FT proposal was for the submission and approval of a Joint Design and Management Framework. This would ensure that the developer (Owner) would use reasonable endeavours to cooperate with the developer of the FT development to produce and submit to the Council for approval a Joint Design and Management Framework in respect of the Pocket Park at the western boundary and where necessary amend the Public Realm Specification. The indicative landscaping material palette is similar to that proposed on the FT site and this will be refined at a later stage.
172. The details of the management and maintenance arrangements between the two developers to ensure that the new public realm along the boundary will operate for optimum public use by ensuring that closure dates, opening hours, security and gating arrangements across both sides of the boundary are fully co-ordinated.
173. The applicant has completed a sunlight and overshadowing analysis on the public realm areas. The BRE suggests that for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21st of March.
174. The new public route through between the proposed development and the Former FT  
Building in situ currently enjoys 2 hours of sun on ground to 28.5% of its area on 21st March. When both the proposed development and the consented scheme at the FT Building are in place, the level of the 2-hour sun on ground

would increase slightly to 20.30% of its area on 21st March. This shows that the schemes improve the levels of sunlight this space will enjoy.

175. In terms of the new Bankside Square and the Bankside Path, this amenity space would enjoy 2 hours of sun on ground to 51.1% of its area on 21st March with the consented FT schemes and the proposed Red Lion Court developments in place. This space will therefore meet the BRE guidelines criteria and can be considered to enjoy good light levels.
176. The baseline ecological survey identified the site as possessing high potential to support nesting birds, moderate potential to support pollinating invertebrates and low potential for foraging bats within the site's zone of influence. No further surveys were recommended and the Council's own Ecology Officer has confirmed this. A number of ecological enhancements were recommended and conditions would ensure these are secured.

#### Urban Greening and trees

177. Policy G5 of the London Plan 2021 encourages major developments to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The policy also recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding E(g) iii uses).
178. 6 existing trees exist within the site. The findings indicate that the existing trees are categorised into categories B and C (3 No. category B and 3 No. category C trees). The proposed development would adopt the reintroduction of trees to reinstate similar existing tree species within the proposed public realm. The tree planting proposals (indicative showing 38 in total) appear to offer a wide range of native species, including Lime, Birch, Rowan, Apple and cherry species. As well as a variety of height structure, colour and texture.
179. The Council's Tree officer has not raised any objections to the loss of the trees. Officers would assess canopy cover at time of planting plus 25 year projections. Tree growth will be limited under the cantilevered parts, but it is possible to condition species, pit design and available soil and maintenance. The mitigation strategy would provide an increase in vegetation and is supported. Using the GLA UGF methodologies, a score of 0.35 would be achieved, which exceeds the 0.3 target score. Green walls are proposed as part of the greening strategy, but given the fire risks Officers would request that this be removed and a condition could secure this. This does not lower the UGF significantly.
180. There would be a requirement for minimum soil volume for any tree, which could be conditioned. Irrigation and establishment will be key with landscaping and a condition would need to include a specific landscape management plan.

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

181. Policy P56 (Protection of amenity) of the Southwark Plan states that developments should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users. This includes privacy and outlook impacts, overlooking or sense of enclosure, loss of daylight and sunlight, and unacceptable noise from developments.

## **Impact of the proposed use**

182. The site and its surrounding area comprises predominantly commercial, retail, cultural and tourist uses. The existing Red Lion Court building is in office use and when redeveloped would be intensified with its enlarged floorspace. The adjoining FT building is (and will be when extended) in office use and the proposal would not compromise this use. The introduction of the other uses (retail and wellness centre) would not impact negatively on the adjoining uses. The Anchor public house would not be restricted by these uses. When this proposed development is complete, it would complement and enhance the two combined sites, as envisaged in Site Allocation NSP06.
183. The Premier Inn hotel is located to the south east of the site, which is a C1 class use. The hotel has raised objections that the proposal would impact on their business by reason of its proximity to their building. This is discussed further below, but in terms of the proposed use it would not restrict the hotel use.
184. Letters of support have been submitted by nearby theatres and restaurants, emphasising the benefits of the proposed use and the improved public spaces.
185. There are residential uses to the south, but this proposed development does not introduce any noise generating use that differs from this South Bank area.

## **Daylight and sunlight impacts**

186. The following section of this report details the potential daylight, sunlight, and overshadowing impacts of the proposed development on surrounding residential properties. This analysis is based on guidance published by the Building Research Establishment (BRE).

### **BRE Daylight tests**

187. The BRE report gives criteria and methods that are explained subsequently for calculating daylight and sunlight effects on surrounding receptors as a result of the proposed development.
188. Diffuse daylight is the light received from the sun, which has been diffused through the sky. Even on a cloudy day, when the sun is not visible, a room will continue to be lit with light from the sky. This is diffuse daylight. Diffuse daylight calculations should be undertaken to all rooms within domestic properties,

where daylight is required, including living rooms, kitchens and bedrooms. The BRE guide states that windows to bathrooms, toilets, storerooms, circulation areas and garages need not be analysed. These room types are non-habitable and do not have a requirement for daylight.

189. The BRE guideline tests undertaken for this daylight assessment are the Vertical Sky Component (VSC), and Daylight Distribution (DD). The VSC test calculates the angle of vertical sky at the centre of each window and plots the change between the existing and proposed situation. 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 also advises that VSC can be reduced by about 20% of its original value before the loss is noticeable. In other words, if the resultant VSC with the new development in place is less than 27% and/or less than 0.8 times its former value, then the reduction in light to the window is likely to be noticeable.
190. The distribution of daylight within a room can be calculated by plotting the 'no skyline'. The no skyline is a line that separates areas of the working plane that do and do not have a direct view of the sky. Daylight may be adversely affected if, after the development, the area of the working plane in a room that can receive direct skylight is reduced to less than 0.8 times its former value.

#### BRE Sunlight Tests

191. When assessing sunlight, the BRE recommends that the Annual Probable Sunlight Hours (APSH) received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter. Where the proposed values fall short of these, and the absolute loss is greater than 4%, then the proposed values should not be less than 0.8 times their previous value in each period (i.e. the proportional reductions should not be greater than 20%). The BRE guidelines state that '...all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block out too much sun'. The APSH figures are calculated for each window, and where a room is served by more than one window the contribution of each is accounted for in the overall figures for the room. The acceptability criteria are applied to overall room based figures.

#### Overshadowing

192. Section 3.3 of the BRE guidelines describes the method of assessment of the availability of sunlight within garden/amenity spaces. This relates to the proportion of shading on March 21st. The BRE criteria for gardens or amenity areas are as follows:

*'It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity space should receive at least two hours of sunlight on 21 March. If as a result of a new development an existing garden or amenity space does not meet the above, and the area which can receive two*

*hours of sunlight on 21 March is less than 0.8 times its former value, then the loss of amenity is likely to be noticeable.'*

193. This report considers the daylight and sunlight effects of the proposed development under 2 scenarios:

1) The Existing Scenario – The assessments are undertaken with the surrounding properties as they stand today.

2) The Cumulative Proposed Scenario – The assessments are undertaken with the surrounding properties as they stand today with the exemption of the Former FT building which is being considered based upon the consented scheme.

194. Where appropriate to each building, the above tests have been run against the following scenarios:
- Existing vs. Proposed (With Balconies);
  - Existing vs. Proposed (Without Balconies);
  - Existing vs. Cumulative Proposed (With Balconies);
  - Existing vs. Cumulative Proposed (Without Balconies).

This follows the BRE guidelines advice and has been used to understand the impact of the proposals rather than any effect the balconies and roof overhangs have on the levels of daylight enjoyed.

195. The applicant has tested the nearest residential units close to the development site and their impacts are discussed below.

#### **Map: Properties tested**



	Building Name
1	1-29 Anchor Terrace
2	123 Park Street
3	89-99 Park Street
	87 Park Street
	85 Park Street
	83 Park Street
	81 Park Street
	79 Park Street
	77 Park Street
	75 Park Street
	73 Park Street
4	Premier Inn, 34 Park Street

196. The BRE guidelines state that the standards may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. Whilst the BRE guidelines discusses the possibility of assessing hotels, Officers consider that they do not have a reasonable expectation of daylight/sunlight in this central London location where the occupants are very transient. However, the applicant has carried out an assessment on the Premier Inn hotel in any case. The Anchor Pub has been excluded from the assessments as it is understood that there is no residential accommodation.
197. 1-29 Anchor Terrace  
The VSC and NSL daylight tests show that all rooms will either experience no loss of daylight or experience a small reduction which is well within the BRE recommended criteria.
198. In the cumulative scenario, the majority of rooms should experience only small additional losses of daylight that are well within the BRE guidelines. 8 rooms would experience VSC reductions that exceed the BRE guidelines (biggest loss around 31%). With regard to the daylight distribution (NSL) assessment, all rooms would experience either no loss of NSL or reductions by a maximum of 1.8% which is considered negligible. This scenario is worse, but does show that it is the FT development that would have the greatest impact on 1-29 Anchor Terrace.
199. 1-29 Anchor Terrace is located to the south of the development site and is therefore not required for sunlight assessment. There are no private gardens/balconies and therefore there was no overshadowing assessment carried out on this property. In summary, there would be minor adverse effect on daylight to a small number of room, but generally would retain good levels of daylight and sunlight when the development is completed.
200. 123 Park Street and 1 – 53 Old Theatre Court  
There are no balconies serving this block of flats. The VSC and NSL daylight tests show that all rooms would either experience no losses of daylight or experience a small reduction which is well within the BRE recommended criteria. The proposed development will therefore not cause an adverse effect under this scenario.

201. Under the cumulative scenario, there will be some small losses as seen in the VSC results. 12 rooms would experience VSC reductions that exceed the BRE guidelines (7.79% to 22% over the BRE guidelines). This does show that these impacts are primarily as a result of the FT Building development (which has already been consented) rather than the proposed development. With regard to the daylight distribution (NSL) assessment, the majority of rooms would experience reductions in accordance with the BRE recommended criteria.
202. 123 Park Street and 1-53 Old Theatre Court is located to the south of the development site and is therefore not required for sunlight assessment. There are no private gardens/balconies and therefore there was no overshadowing assessment carried out on this property. In summary, there would be minor adverse effect on daylight to a small number of room, but generally would retain good levels of daylight and sunlight when the development is completed.
203. 73-99 Park Street  
This is a residential development immediately located to the south of the Site with flats on the corner plots (89-99 Park Street) and terraced houses in between (73-87 Park Street). The applicant has assessed 24 windows that serve 15 rooms.
204. 88-99 Park Street (block of flats)  
In terms of the VSC results, the 3 windows that experience a reduction that is greater than 20% are the windows at second floor levels facing onto Park Street. These windows experience reductions of up to 37.27% and are in part due to the relatively deep roof overhang. Further calculations without the overhangs have therefore been undertaken. The VSC assessments without the roof overhangs have been undertaken to the windows of the 2nd floor flat facing onto Park Street (where the greatest loss would be). The VSC results show that 2 of the 4 windows will experience reductions within the BRE guidelines and the remaining 2 windows will experience reductions only marginally beyond the BRE guidelines with a maximum percentage reduction of 20.97%. This therefore, shows that it is due to the presence of the roof overhang that these windows experience a slightly larger relative reduction.
205. The NSL results show that all rooms will experience either no reduction or small reductions in daylight distribution which are within the BRE guidelines.
206. In the cumulative scenario with the balconies in place, the VSC results show 6 windows will experience small reductions in daylight that are well within the BRE guidelines. These windows experience reductions of up to 37.61%. The NSL results show that the kitchen on the ground floor (facing onto Park Street) will experience a reduction of 34.2%.
207. Nevertheless, when looking at the cumulative scenario with the balconies removed, (2nd floor flat facing onto Park Street) the VSC results show that 1 of the 4 windows will experience reductions within the BRE guidelines and the remaining 3 windows will experience reductions beyond the BRE guidelines



with a maximum percentage reduction of 26.34%. This is not considered to be a significant exceedance of the BRE guidelines.

208. 73-87 Park Street (terraced houses)

The applicant did not have access into the properties so have assessed all windows regardless of whether they serve a non-habitable room. A total of 48 windows serving 40 rooms to this terrace of houses were assessed.

209. The VSC results show that all but 11 windows will experience small reductions in daylight that are well within the BRE guidelines. Those 11 windows that experience a reduction that is greater than 20% serve No's 87, 85, and 83 Park Street. Whilst the ground floor living rooms meet the BRE guidelines, it is the bedroom windows at first and second floor levels that would experience reductions of up to 37%. It is noted however, that these windows on both floor levels have relatively deep roof overhangs above the windows as the elevation steps slightly back at second floor level. As such, the applicant undertook further assessment with the overhangs removed. Meanwhile, the NSL results show no loss or small reductions. Furthermore, it should be acknowledged that these are bedrooms that have less expectations for daylight.

210. The VSC results with the overhangs removed show that all windows will experience reductions within the BRE guidelines. This, therefore, shows that it is due to the presence of the roof overhang that these windows experience a slightly larger relative reduction.

211. In the cumulative scenario, there are more windows that would experience reductions exceeding the BRE guidelines (13 windows and up to 41.9%). However, the NSL results only one room would exceed the guidelines and only marginally. Again, the applicant undertook an analysis of the cumulative scenario without the overhangs and this is much improved with only 3 windows will experience reductions beyond the BRE guidelines with a maximum percentage reduction of 21.75%. This is only marginally beyond the BRE guidelines.

212. It is considered that whilst there would be some reduction in daylight to the terraced houses, these would not be considered to be significant in this central London location.

213. The development is to the north of the Park Street houses and therefore no sunlight or overshadowing assessment was required.

214. Premier Inn, 34 Park Street

Whilst it is considered that the building does not have a reasonable expectation of daylight or sunlight calculations have been carried out for completeness. 26 rooms served by 40 windows were assessed.

215. 8 windows would experience VSC reductions that would be greater than the BRE guidelines. These would range from 25.19% to 39.4%. In terms of the NSL results, 6 rooms would exceed the guidelines by up to 59.7%. However, whilst these losses seem greater than the others in the neighbouring area, it



should be noted that this is a hotel where occupants are transient. Given the location of this hotel on the eastern side of the proposed development, it was only considered necessary to consider the effect of the new building as the FT building proposals will not be seen from these windows.

216. Due to the fact that the windows are not orientated within 90° of due south, sunlight  
APSH assessments have not been carried out. There are no amenity spaces associated with the hotel and therefore no overshadowing analysis was made.

**View: Park Street, corner with Bank End looking at the Premier Inn**



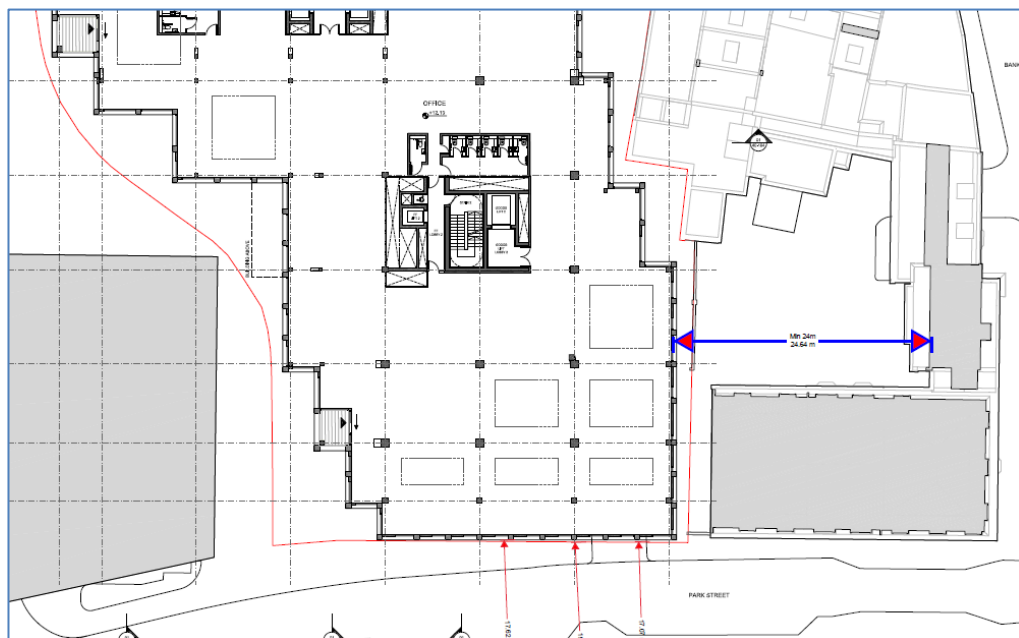
Overshadowing of nearby amenity spaces

217. The Anchor Bankside's terrace is located to the north-east of the site and the results show that it would enjoy at least 2 hours of sunlight to 99.7% of its area on 21st March.  
Overall, this space will therefore meet the BRE guidelines criteria and should continue to enjoy good levels of sunlight throughout the year.
218. Conclusion on daylight and sunlight impacts  
Following the review of the analysis, it is considered that the proposed development would result in some loss to the neighbouring residential properties, but these are not considered to have a significant detrimental impact.

## Overlooking of neighbouring properties

219. In order to prevent harmful overlooking, the Residential Design Standards SPD requires proposed developments to achieve a distance of 12m between the front elevations of buildings and/or across a highway, and a minimum of 21m between rear elevations.
220. The nearest residential windows would be to the south (73-99 Park Street). The proposed building line would not go beyond what exists now. The distance between the nearest proposed window/terrace to the windows of the residential units would be at least 19m. It would be 17m to the front yard. This exceeds the above distances across a highway.
221. An objection has been received from the adjoining hotel. They argue that the increase in proximity to the existing hotel and the proposed development brings windows, roof and 'pocket' terraces (with glazed balustrades) very close to the site boundary where they will overlook the bedrooms on that side of the hotel. Nevertheless, the flank windows of the proposed building would be at 90 degrees to the northern windows at the Premier Inn, which limits direct overlooking. The hotel windows that face directly onto the proposed development would be approximately 24m, which exceeds the minimum distances. In any case, the Residential Design Standards guidelines applies to residential properties and not hotel use.

### Plan: Distance between Premier Hotel western elevation and proposed building



### Noise impacts

222. The proposed development also provides terraces round the upper floors which could potentially lead to privacy issues. Levels 06, 08, 09 and 10 have direct

access to terraces, with the occupiers of other floors able to use them if they are within the same tenancy. Level 10 has access to two terraces, to both the north and south of Red Lion Court. Smaller 'Pocket' terraces are located on Level 02 to 09.

223. There are various sizes of terraces, some of which wrap around the elevations in L-shaped forms. The ones to the south have been designed with more planting, to provide shading, wind protection and privacy to Park Street residents. The southern portion of the lowest Level 06 terrace will be accessible for maintenance purposes only, in order to minimise overlooking on Park Street.
224. The applicant proposes that the use of the terraces would be limited for groups/socialising/meetings. The hours that could be allowed for this kind of use could be 09:00 – 19:00 - Monday to Sunday nearest the Park Street residents. The terraces wrapping around the building along the other elevations could be used at later times. The terraces will be managed jointly by the tenants of the building and the Landlord's on-site managers. It is anticipated that security staff/building management will carry out regular checks to discourage any anti-social behaviour and control noise levels and there will be a 24-hour presence on site. Buffer zones of planting and glass balustrade that will act as acoustic screening are also proposed in order to safeguard the amenity of neighbouring residents. Officers consider that with a terrace management plan post-permission then this could manage the potential noise and disturbance from the use of these terraces.

#### Conclusion on amenity impacts

225. The proposed development would have some impact on the neighbouring properties, particularly to the development to the south. Nevertheless, as discussed above, the impacts would be limited and would not result in a significant adverse impact on their amenity.

### **Transport considerations**

226. Policy P50 'Highways impacts' of the Southwark Plan 2022 seeks to ensure that developments minimise the demand for private car journeys. In addition, the policy requires developments to demonstrate that the road network has sufficient capacity to support any increase in the number of the journeys by the users of the development, taking into account the cumulative impact of adjoining or nearby development.
227. The Mayors Transport Strategy (MTS) Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application.
  - Vision Zero
  - Healthy Streets
  - Air Quality

## Trip generation

228. The site is located in an area with excellent (6 – high) public transport accessibility level and lies within a short walking distance of London Bridge tube/train station and abuts the bus routes on Southwark Bridge Road. In terms of mode share, most of the trips to the site would be by public transport, cycling and by foot. Concerning the vehicle movements ensuing from this development proposal, the Council's own Transport Planner looked into the comparable sites' travel surveys within TRICS travel database and has revealed that the expansion of this development would generate 16 net additional two-way vehicle movements in the morning or evening peak hours. Although Officers own projected vehicular trips are higher than the forecasted 1 two-way vehicle movement in each of the peak hours by the applicant's consultants, even taking into account the likely vehicle movements emanating from other committed developments in this locality, it is considered that this development proposal would not have any noticeable adverse impact on the existing vehicular traffic on the adjoining roads.
229. Regardless, the applicant has proposed a few travel plan initiatives encompassing the provision of cycle parking and shower/changing facilities, a cycle hub and repair facility, plus sustainable transport information for the staff/patrons of this development and, promotion/monitoring of sustainable travel through the appointment of a travel plan co-ordinator.
230. In terms of delivery trips, the applicant's consultants have estimated that 106 two-way delivery vehicle movements would occur on this site per day mostly (77%) by light vans, which would be reduced to 86 (43 one-way) through a planned consolidation method and, that this development would create some 931 and 720 two-way net supplementary public transport trips in the morning and evening peak hours, correspondingly. These figures are deemed reasonable.
231. It is not considered that the scheme would generate an adverse impact on the local highway network.

## Car Parking

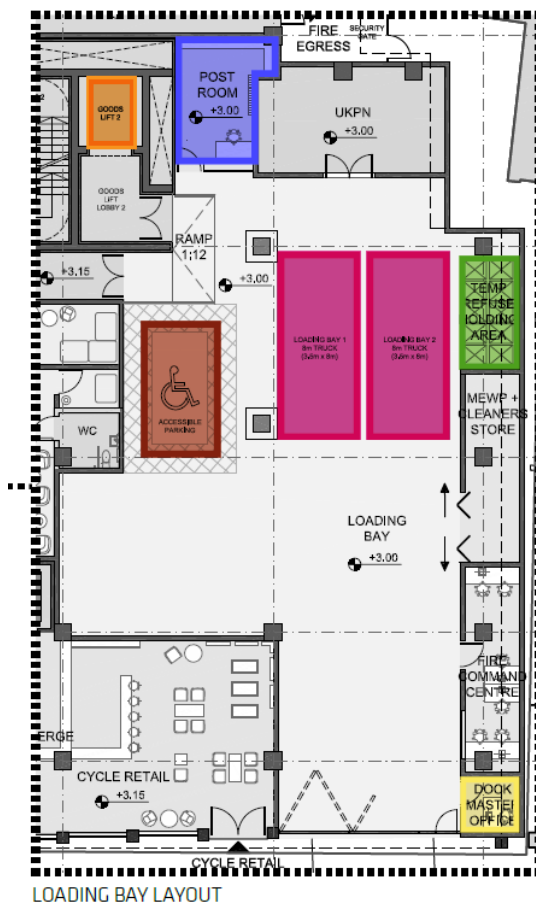
232. The existing building on the site contains an off-street parking area, accessed via Park Street, which contains six car parking spaces. The development is car-free except for 1 disabled parking space located on the ground floor, within the loading bay area as part of the proposals. This space would be provided at ground floor level within the service yard and would be accessed from Park Street.
233. The site is located within an existing Controlled Parking Zone (CPZ) and a s106 obligation would ensure that no future occupiers of the proposed development could obtain resident parking permits. There are few car club spaces in the area of this development including 2 on the opposite Porter Street and 1 on the nearby Emerson Street.

### Servicing and Delivery

234. The development would be serviced from Park Street, via a fully enclosed service yard that has been relocated from existing position in order to create new publicly accessible north-south route to the west of the site. Two loading bays are proposed. Swept path analysis demonstrates that vehicles can enter and exit in forward gear.
235. All vehicles entering the site would be required to be under 8m in length. A booking system would be in place to ensure compliance and to ensure that deliveries are scheduled so as not to cause congestion along Park Street. It is also proposed that reduced delivery or servicing activity would occur within the peak hours (Mon – Sat) as set out below:
- 08:00 – 09:00
  - 15:00 – 16:00
  - 17:00 – 18:00

This would be secured in a delivery and servicing plan.

### **Plan: Loading Bay layout**



236. It is proposed that a consolidation management strategy would be implemented for the site. This will effectively minimise the delivery vehicle trips expected to

attend the site. In addition to traditional loading bays, the proposals also include provision of two cargo bike parking bays to the north of the site on Bankside. These spaces allow for potential further reductions in the number of delivery and servicing vehicles visiting the site. It is anticipated that the consolidation strategy would be activated and implemented at the appropriate time for the building's occupation levels and this would be discussed with the Council officers once the applicant prepares their detailed DSP report to be secured by condition. It is also recommended that condition controlling the hours of servicing is required to limit noise and disturbance on nearby residents.

237. Under the managed consolidation scenario, it is envisaged there would be 43 daily servicing trips. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the Council is recommending that applicants enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per 500 sqm of non-residential floor-space. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulations 122 test, in that it would 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.

238. The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial and residential, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target (43 trips) the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the Council to utilise for sustainable transport projects in the ward of the development. The Council will retain £1,600.00 for assessing the quarterly monitoring. The bond in this instance would be £6,400 based on the non-residential floor space. The applicant has agreed to the contribution, which can be collected via the legal agreement.

#### Refuse and waste management

239. Waste would be collected everyday by a contractor with appropriately sized refuse vehicles under 8m in length. Waste would be stored at the second basement level and brought by Facilities Management to the loading bay area via a servicing elevator lift. There would be daily compaction of waste at the site.
240. The collection would be within the loading bay and would be collected by private refuse contractors. It is considered that the refuse strategy is satisfactory and a condition for the delivery and servicing plan will include details of waste management. It is acknowledged that the final positioning of service yard doors

would need to be refined at detailed design stage to ensure that the appropriate visibility would be achieved.

### Public Transport

241. The nearest national rail station and London Underground Station is London Bridge, approximately 480 metres away, providing Jubilee and Northern line London Underground (LU) services and Thameslink, Southern and Southeastern National Rail services. The nearest bus stop is located on Southwark Bridge Road (stop BC), which is within 100m from the edge of the development site on Park Street. There are 15 bus routes within reasonable walking distance to the site (650m).
242. It is anticipated that the majority of trips to the site would be by public transport or cycle, with the last leg of public transport journeys made by foot. Council's own Transport team considers that this locality would benefit from improved bus/riverboat facilities including the provision of bus countdown at the 2 bus stops/shelters beside this site on Southwark Bridge Road. The upgrade would replace the existing bus stand with a new bus stand that would include a digital display enabling passengers to see the forecast arrival times of buses. There are two bus stands in question, so each upgrade would cost £20,000. The applicant has agreed to this contribution.
243. TfL had requested a financial contribution of £220,000 towards cycle hire stands. However, both the applicant and Council Transport officers believe that a financial contribution of £50,000 be made by the applicant to support the development of new TfL Cycle Hire stands in the local area around the site would be more reasonable. This is accepted by the applicant.

## **Active transport**

### Walking and the public realm

244. There is a generous walkway abutting the northern boundary of this site forming the riverside walk and connecting to the riverboat service along River Thames. Two steep stair accesses from Southwark Bridge Road lie at the northern and southern ends of this site plus an alternative levelled route with more gentle stairs from this road through the neighbouring Gatehouse Square/Porter Street at its southern side.  
The footway next to its southern perimeter on Park Street connect easterly to London Bridge tube/train station. A signalised pedestrian crossing also lies at the immediate south-eastern side of this site on Southwark Bridge Road. This site joins with various cycle routes in this locality too including the Cycle Superhighway.
245. The Thames River Footway is a good quality walking path with places for pedestrians to rest on riverside benches. It is considered that the proposals would improve the walking environment and the proposed additional pedestrian route through the site will improve connectivity to the local area.



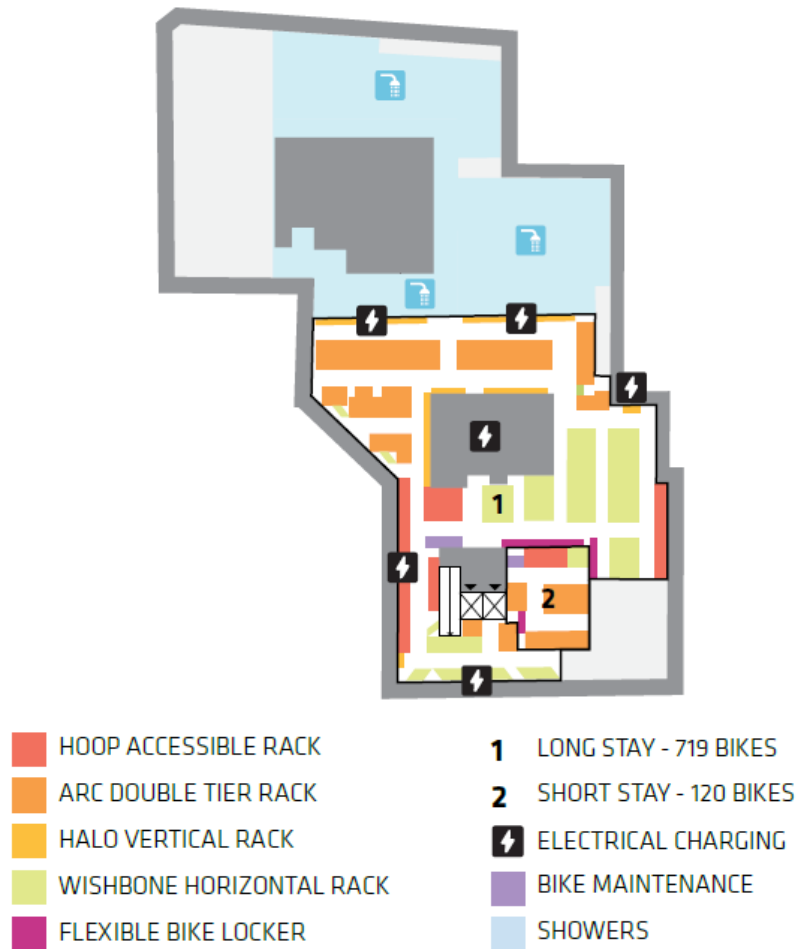
246. TfL has requested that a £18,000 contribution for a new Legible London sign/s and to enhance and map refresh of local existing Legible London signs should be secured. This request is in line with Policy T3, by supporting 'walk and cycle wayfinding improvements' in Table 10.1 and Policy T2 'Healthy Streets'. The applicant has agreed to this.
247. The applicant's own analysis of the 3 years traffic accident data occurring in the vicinity has indicated that there is significant level of serious/fatal accidents being attributed to pedestrians and pedal/motor cyclists. Hence, there is the need for improved highway safety measures to assist the vulnerable road users at this location. The active travel zone assessment by the applicant's consultants has also suggested that improved crossing for pedestrians in this area would be needed.
248. Officers have requested a number of works that the applicant should contribute towards improvements to highway safety and pedestrian routes around this development plus improved public transport/cycling facilities.

## Cycling

249. London Plan Policy T5 sets minimum cycle parking standards for different uses. Southwark Plan Policy P53 sets out a higher requirement than the London Plan standards in respect of commercial parking.
250. London Plan and Southwark Plan requirements:

Land Use	London Plan		Southwark Plan	
	Long-stay	Short-stay	Long-stay	Short-s
Office Class E(c)	458	16	711	128
Retail Class E(a) and E(b)	4	36	6	36
Health Centres	2	2	2 (1 space per 5 staff)	2 (1 space staff. Min of 2 space
<b>Total</b>	<b>464</b>	<b>54</b>	<b>719</b>	<b>166</b>

### Plan: Indicative plan cycle provision in Basement 01



251. A total of 719 long-stay cycle parking spaces are proposed. Cycle parking will be accessed from Park Street to a dedicated cyclist entrance on the west of the building within the proposed public realm space. This entrance would be located directly off Park Street for easy access. The long-stay cycle parking contained within Basement 01 can be accessed by occupiers via a gullied stairwell and two dedicated cycle lifts behind a security line. There would be a Cycle Hub Services from this entrance and incorporates valet bicycle parking, bike maintenance, coffee bar, shop and also provides a secure entrance to the occupiers' cycle parking and welfare facilities at Basement 01. The Cycle Services has a concierge, which is envisioned as a local centre for active travellers offering a front-of-house reception facility to welcome visitors, occupiers and residents alike.
252. It is proposed that 167 short-stay cycle parking spaces be provided. A total of 48 spaces are proposed to be provide at-grade. The balance of 119 spaces will be located on the first basement with cycle access from the Park Street entrance.
253. TfL's comments were that the number of cycle spaces complies with London Plan Policy T5, but the long-stay cycle parking is not in accordance with the

London Cycle Design Standards (LCDS). This includes the provision of a minimum percentage of Sheffield Stand spaces at normal and wider spacing; stands to allow space for the use of a 'D' lock; minimum spacing between two-tier racks, greater aisle widths; more concierge and security details. TfL has also sought for direct access from the office floors to the cycle parking.

254. The applicant had responded to the comments. Current cycle parking proposals include provision of 28 "Halo" stands. This equates to 3.9% of the total long-stay provision. These stands are considered to be accessible as they provide the required 1.8-metre spacing. A further 24 "Hoop" stands are proposed, equating to 3.3% of the long-stay spaces. These stands are designed to accommodate non-standard cycles such as tricycles. The applicant also argues that over 20% of stands are provided as "Wishbone" stands. These are effectively Sheffield stands that allow the locking of both wheels and the frame.
255. It is proposed that all stands provided within the public realm be Sheffield stands as requested. For the concierge service, two-tier stands have been proposed with spacing in accordance with manufacturer's specifications. It is not considered that wider spacing will be required, as concierge service staff will be positioning cycles within the stands, rather than visitors themselves. Officers consider the above to be acceptable.
256. The applicant has proposed a greater number of cycle parking spaces within the building to ensure it meets with the more stringent Southwark Plan standards. This has meant that some of the LCDS could not be met. Officers consider that a balance needs to be struck. Many of the proposals including the cycle services hub would encourage more users and visitors to cycle to the development. Officers do not consider that some of the LCDS shortfalls should be a reason for refusal in itself.

### Construction

257. A draft Construction Management Plan (CMP) has been submitted, which sets out details of the works required to carry out the demolition, infrastructure enabling, and Construction activities involved whilst outlining their anticipated timescales and identifying the environmental impact of the works and where practicable, proposals for how these are to be mitigated. Council's own Transport officer agrees with this in principle, but has requested a number of details to be amended. It is considered that these could be secured once a final demolition and CMP is submitted post permission, which would be secured by s106 agreement.
258. TfL has stated that to align with Policy T7, given the site's location adjacent to the Thames and surrounding very narrow roads, use of the river and other sustainable modes for construction such as cargo bikes should be investigated.
259. The applicant sought advice from a qualified professional contractor who indicated that river freight would not be possible due to the tidal nature of the river, the fluvial topography under the high-water line (a bank emerges during

low tide which would mean that any barge/boat could not be located near enough to the quayside for sufficient durations of time) and the constrained nature of the Bankside River Path running between the river and the site. Officers are satisfied that this has been explored and is not feasible.

260. Due to the local traffic restrictions to the east of the site via Park Street larger vehicles that are suitable to arrive from the east will be routed to arrive in a westerly direction along Park Street and routed from the south via Redcross Way from Southwark Street. Due to the location of the development, the neighbouring properties and local road network and the priority placed upon the local residential properties, a route that links directly to and from Southwark Bridge has been proposed for heavy goods vehicles has been identified. It is proposed that primary construction access for HGV's will take place from the south of the site from Southwark Street, which is part of the TfL TLRN. Some of the comments highlighted by TfL will be taken on board when the final CMP is submitted for approval.
261. There will be a number of highway works required as a result of the development. In summary, these are listed below:
- Improved Pedestrian Connectivity:  
Delivery of new Park Street footway to replace the redundant service yard vehicle crossover between 1 Southwark Bridge Road and Red Lion Court (46-48 Park Street).
  - Improved Pedestrian Pavement:  
Reprovision and widening of Park Street footway along the site frontage.
  - Improved Park Street Highway:  
Resurfacing of the carriageway from the eastern edge of the Red Lion Court Site up to the junction with Bank End.
  - Improved Local Area Traffic Management:  
Resurfacing of the raised table on Park Street which assists with speed mitigation.
  - Pedestrian Crossing at Bank End:  
Improve pedestrian crossing at eastern end of Park Street by the Junction with Bank End
  - Lighting:  
Ensure that adequate lighting is provided in front of the Red Lion Court Site for pedestrians.

#### Conclusion on Transport

262. The development is supported because it provides improved and good quality pedestrian and cycle facilities. It reduces car dependency and would not have a significant impact on public transport services. It would have appropriate management to reduce the impact of servicing and delivery, subject to the s106 obligations and conditions.

## **Archaeology**

263. Policy P23 of the Southwark Plan 2022 requires that applications affecting sites within Archaeological Priority Areas (APAs) will be accompanied by an archaeological assessment and a report on the results of a field evaluation of the site, including an assessment of the impact of the proposed development on the archaeological resource. The site lies within the Tier 1 'North Southwark and Roman Roads' Archaeological Priority Area (APA). This APA is the most archaeologically significant area of Southwark. The APA contains all of the borough's nine scheduled monuments and also includes archaeology of other important historic sites.
264. The existing basement occupies most of the site area, with a deeper basement to the north and shallower basement to the south with a deeper sub-basement in the middle. The basements will have removed remains associated with the medieval and later reclamation and occupation of this area and it is likely that only deep alluvial deposits could survive.
265. The Council's Archaeology Officer highlights that much of the footprint of the present building is filled with a basement level that will be expanded. Foundations will be within this expanded basement level. Part of the existing footprint of the building has been archaeologically examined, before the construction of the present Red Lion Court. The Council's Archaeology Officer has noted that the site can be managed with suitable conditions. Any site investigation works within the new area of the basement should be archaeologically monitored. It is unlikely that the landscaping works will impact upon archaeological remains, but locations of deeper impacts should be considered and controlled by condition. It is advised that conditions for archaeological evaluation, mitigation works, foundation design and groundworks should be applied to this application. The reporting condition should also report on the earlier excavations on site, and include them in any publication.
266. The site, due to its location, has the potential to offer significant public benefits to the public in terms of understanding the development of Bankside and the surrounding area between the entertainment zone of the early post-medieval theatres and the Bishop of Winchester's palace. A suitable condition to enable a level of public engagement works should also be applied to this application to ensure it meets the requirements of policy.

## **Environmental considerations**

### **Flood risk and water resources**

267. Policy P68 (Reducing flood risk) of the Southwark Plan states that development must be designed to be safe and resilient to flooding and finished floor levels are set no lower than 300mm above the predicted maximum water level where

they are located within an area at risk of flooding. Additionally, major development is required to reduce surface water run-off to green field run-off rates, and this must be through the application of water sensitive urban design and SUDs.

268. The site lies within Flood Zone 3 and is classified as having a high probability of flooding from tidal and fluvial sources. However, the River Thames defences protect the site up to the 1:1000 year standard and therefore the development would not be at risk of flooding from tidal and fluvial sources. In accordance with NPPF Table 2, the office, retail and commercial spaces are classified as "less vulnerable".
269. The Environment Agency (EA) was consulted but no comment has been provided. The development will include safe access and escape routes to the ground level via internal staircases and an appropriate emergency plan will be implemented. In the event of a breach, finished floor levels at or above breach level will provide flood protection. The breach levels have been taken from the Environment Agency and based upon modelled events up to 2100 to give maximum likely water levels in the event of breach with an allowance for climate change. In case of breach of flood defences, the strategy is to protect the basement by installing demountable or permanent measures with heights up to 3 metres. This would mitigate the potential cost and time of a post-flood recovery of the building. During the detailed design stage, flood resilient or resistant measures are to be considered for areas of the ground floor where the finished floor levels are below 3.30m to help make the building more resilient to surface water flooding. The design of the mitigation measures is to be progressed with further design development and a condition can be recommended.
270. Flooding from sewers
  - Flooding from groundwater
  - Flooding from artificial sources (e.g. reservoirs and canals)
  - Flooding from surface water

Based on all the information available, it is considered that there is a low probability of flooding from the sewers, groundwater sources and artificial sources.

271. In terms of surface water flooding, the majority of the site would be at low risk of flooding, but the applicant note that there would be external areas within the site that might require mitigation measures. The proposal has also been reviewed by the council's flood and drainage engineer. Comments were initially provided by the engineer and more information was required including micro drainage calculations to confirm the rates for the existing and proposed site different scenarios and to confirm that the proposed attenuation volume is sufficient to attenuate the 1 in 1, 1 in 30, 1 in 100 and 1 in 100 + climate change storm periods. Surface water runoff from the proposed development will have an attenuation tank volume of 245m<sup>3</sup> (located in Basement 02), which is

sufficient to accommodate with no flooding to occur on site for the periods of 1 in 1, 1 in 30, 1 in 100 and 1 in 100 +40% climate change.

272. The surface water drainage system has been designed having considerations to the drainage hierarchy. Due to various reasons, a blue roof cannot be installed. However, 1,264m<sup>2</sup> green roof will be incorporated at the roof and terrace levels. Previously, the applicant planned to partially discharge to the River Thames. The applicant now proposes full discharge (4.5 l/s unchanged) to the existing public combined sewer on Park Street.
273. The existing surface runoff rate is 153.1 litres/sec. The development shall significantly reduce the surface runoff rate to 4.5l/s (1 in 100 year plus 40% climate change). This is the same as the greenfield runoff rate. A greenfield runoff rate offset of £366 per cubic metre will be secured in the event that there is a shortfall in attenuation required to limit surface water runoff, which is required by the draft AAP 11.
274. Following further information submitted by the applicant and discussions with the drainage engineer, conditions have been recommended for a final detailed drainage design including drawings and supporting calculations for approval. Consideration should be shown to the implementation of rainwater harvesting. It would also require a detailed management plan confirming routine maintenance tasks for all drainage components and the maintenance owner must also be submitted to demonstrate how the drainage system is to be maintained for the lifetime of the development.

## **Fire**

275. Policy D12 of the London Plan 2021 expects all development proposals to achieve the highest standards of fire safety and to this end requires applications to be supported by an independent Fire Strategy, produced by a third party suitably qualified assessor.  
A fire engineer registered with the Engineering Council UK through the Institute of Fire Engineers has prepared the submitted Fire statement.
276. The London Fire Brigade was consulted and confirmed they had no observations to make.
277. The Fire Statement demonstrates how the development would achieve the highest standards of fire safety, including means of escape, fire safety features and means of access for fire service personnel. The Fire Statement confirms that sprinklers would be installed for each floor. Firefighting lifts would also be designed into the development. The provision of a suitably sized evacuation lift is also proposed in line with Policy D5 of the London Plan.
278. The fire risk assessment/statement covers matters required by planning policy. This is in no way a professional technical assessment of the fire risks presented by the development. The legal responsibility and liability lies with the 'responsible person'. The responsible person being the person who prepares



the fire risk assessment/statement not planning officers who make planning decisions.

## **Ground conditions and contamination**

279. Given the history and nature of the uses on the site, there is potential for contamination. The submitted Phase 1 Land Contamination Desk study report assessed the potential for contamination and provided preliminary information on the expected ground conditions and preliminary information on foundation options regarding the proposed development of the site. Based on historical land uses and its current operational use, the overall risk from land contamination at the site is considered to be low for the current development as the basement is to be retained where possible and extended. The existing basement floors will be demolished in order to build one further basement floor. The existing sheet pile wall which surrounds the basement is to be retained wherever possible, in these areas a new secant wall and liner wall system will be constructed in front. There is an area to the east where the basement would be extended outwards.
280. One of the future considerations highlighted in the report was there be a specialist UXO/UXB risk assessment in accordance with CIRIA Report C681 with regard to construction risk and production of a Remediation Strategy and Verification Plan.
281. The Council's EPT has reviewed this and recommended a condition to ensure further investigations be submitted and should there be any found contamination then remediation strategy be submitted and that the measures be actioned.

## **Air quality**

282. The site is located in an Air Quality Management Area (AQMA) and an Air Quality Assessment has been submitted, which considers the air quality impacts arising from the construction and use of the development. Southwark Plan Policy P65 'Improving air quality', states that development should address the impacts of poor air quality on building occupiers and public realm users by reducing exposure to and mitigating the effects of poor air quality.
283. The assessment concludes that through good site practice and the implementation of suitable mitigation measures, the high risk of dust soiling during demolition and a medium risk during earthworks, construction and trackout activities will be minimised. With regards to fugitive PM10 emissions, where there is there is a medium risk during demolition and a low risk during earthworks, construction and trackout, again, good site practice and mitigation measures will minimise the impact. The residual effect of the construction phase on air quality is therefore not significant. Road traffic generated by the proposed development does not breach the threshold of the air quality objectives. The report did not find any unacceptable impact from air quality either to the new sensitive receptors or as a result of the development. The

proposed development is air quality neutral, therefore mitigation or additional off-setting is not required. EPT did not raise any objections on this aspect of the scheme. The backup diesel generator is also to vent at roof level as per Flue & Extract Ventilation Report which is agreeable. Mitigation measures for the construction phase has been proposed and therefore a condition to require these be adhered to is recommended. Kitchen extract is to vent at roof level which is agreeable.

## **Noise and vibration**

284. A Noise Impact Assessment (NIA) has been submitted and reviewed by EPT. Nearby noise sensitive receptors to the site would be the residential accommodation to the south and east. The proposed plant limits in the submitted NIA are agreeable. The emergency plant noise limits however require further discussion as no information is provided on how often this plant would be tested. At a starting point EPT would request they meet the levels set out. The exact specification is not yet known condition has been recommended. The noise report refers to target levels but further assessment is required for potentially late night use of office events as well as restaurant spaces. EPT has recommended that the hours of use of the commercial terraces be limited.

## **Sustainable development implications**

### **Energy**

285. Policy SI2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. Policy SI3 require consideration of decentralised energy networks, Policy SI4 deals with managing heat risk and Policy SI5 is concerned with protecting and conserving water resources and associated infrastructure. As per the carbon emission reduction policies of the London Plan 2021, the proposal would be expected to achieve zero carbon (with financial offset permitted once an on-site 35% carbon reduction against part L of the Building Regulations 2013 has been achieved).
286. Policy P70 of the Southwark Plan sets out the borough approach to ensuring that new developments tackle climate change. The approach is generally consistent with London Plan Policies but also requires new commercial developments to meet BREEAM 'Excellent'. The policy also states that non-residential developments must reduce carbon emissions by at least 40% on 2013 Building Regulations. Southwark Council's carbon offset cost is £95 for every tonne of carbon dioxide emitted per year over a period of 30 years. This is the equivalent of £2,850 per tonne of annual residual carbon dioxide emissions.
287. The applicant has submitted an Energy Statement based on the Mayor's hierarchy. This details how the targets for carbon dioxide emissions reduction are to be met. A combination of 'Be Lean' and 'Be Green' measures have been employed in an attempt to achieve the reduction in line with the GLA guidance

on preparing energy statements, P70 of the Southwark Plan 2022, and the Southwark Sustainable Design and Construction SPD.

Be Lean (use less energy)

288. 'Be lean' refers to the approach taken by the design team to maximise the positive aspects of the scheme's passive design to minimise the base energy demand of the buildings. As part of this application, key passive ('Be Lean') design features include:
- Enhanced U-values
  - The building's layout has been optimised to guarantee enough level of daylight
  - High performance glazing
  - Improved air permeability
  - Improved ventilation performance (both natural and mechanical)
  - Improved lighting and lighting controls
  - High efficiency cooling
  - Low thermal bridging
289. The development achieves a 17% reduction in overall carbon emissions over Part L, through passive design and energy efficiency measures alone.

Be Clean (supply energy efficiently)

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

Be Green (Low or Carbon Zero Energy)

291. ASHP's and Photovoltaic (PV) Panels are the green/renewable energy technologies have been considered suitable for the proposed development. The ASHP's has been suggested for the space heating. The PV panels would be placed on the roof (360sqm). The ASHP's and PV's are expected to provide a further 32% improvement over Part L 2013.
292. The overall regulated CO2 savings on site against a Part L 2013 compliant scheme are therefore 49%.
293. The proposed development complies with the London Plan CO2 savings target of 35% overall. The proposed development also complies with Southwark Plan target of 40% for non-domestic element. However, it does fall short of Southwark's Local Plan target of 100% emission reduction against Building Regulations for the domestic element.
294. The carbon shortfall of 219 tonnes CO2 per annum amounts to £624,275. The overall contribution has been agreed with the applicant, and the shortfall

amount is secured in the S106 Agreement. The S106 Agreement will also include the obligation of requiring the development to be constructed in accordance with the Energy Statement and review the feasibility of connecting to the DHN.

### Overheating

295. London Plan Policy SI4 and Policy P69 of the Southwark Plan set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The six-step hierarchy is as follows:
- Minimise internal heat generation through energy efficient design; then
  - Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
  - Manage the heat within the building through exposed internal thermal mass and high ceilings; then
  - Use passive ventilation; then
  - Use mechanical ventilation; then
  - Use active cooling systems (ensuring they are the lowest carbon options).
296. The proposed development has been designed to reduce cooling demand and overheating risks. Cooling is delivered to the building by highly efficient Air Source Heat Pumps.

### **Whole life cycle and carbon capture**

297. London Plan Policy SI2 requires a calculation of whole life cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment (WLCA). This captures a development's unregulated emissions, its embodied emissions and the carbon impact of mid-life maintenance and end- of-life dismantling.
298. A Whole Lifecycle Carbon (WLC) assessment has been undertaken for the proposed development. The GLA raises no objection to the assessment. The estimated whole lifecycle carbon emissions of the proposed development have been provided. A whole life cycle monitoring report has been requested by condition.

### **Circular economy statement**

299. Policy GG5 of the London Plan 2021 promotes the benefits of transitioning to a circular economy as part of the aim for London to be a zero-carbon city by 2050. Policy D3 requires the principles of the circular economy to be taken into account in the design of development proposals in line with the circular economy hierarchy. Policy SI7 requires referable applications to develop circular economy statements.

300. A Circular Economy Statement has been submitted and addresses those 9 core principles that the GLA has set out in their Circular Economy Statement Guidance, which includes:
- Minimising the quantities of materials used,
  - Minimising the quantities of other resources used,
  - Specifying and sourcing materials responsibly and sustainably,
  - Design for longevity, adaptability or flexibility and reusability or recoverability,
  - Design out construction, demolition, excavation and municipal waste arising,
  - Manage demolition waste,
  - Manage excavation waste,
  - Manage construction waste, and
  - Manage municipal waste.
301. A planning condition requiring a Circular Economy Statement to be agreed in writing by the Council prior to commencement of any works on site is recommended. Additionally, a special condition is to be imposed on the decision notice that requires a post completion circular economy report no later than three months following substantial completion of the final residential unit. This report will set out the predicted and actual performance against all numerical targets in the relevant Planning Stage Circular Economy Statement.

## **BREEAM**

302. Southwark Plan Policy P69 requires developments to achieve a BREEAM rating of 'Excellent' for non-residential development over 500sqm. A preliminary BREEAM assessment for the proposed development was undertaken. The pre-assessment results demonstrate that the development is being designed to achieve a BREEAM New Construction rating of 'Outstanding', which exceeds the minimum 'Excellent' required by P69 of the Southwark Plan. This is welcomed.

## **Digital connectivity infrastructure**

303. The NPPF recognises the need to support high-quality communications infrastructure for sustainable economic growth and to enhance the provision of local community facilities and services. To ensure London's long-term global competitiveness, Policy SI6 (Digital Connectivity Infrastructure) of the London Plan 2021 requires development proposals to:
- be equipped with sufficient ducting space for full fibre connectivity infrastructure;
  - achieve internet speeds of 1GB/s for all end users, through full fibre connectivity or an equivalent.
  - meet expected demand for mobile connectivity; and
  - avoid reducing mobile capacity in the local area.

304. A pre-commencement is attached to the decision notice that requires detailed plans to be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. This is in line with the requirements of Policy SI6 of the London Plan 2021.

### **Planning obligations (Section 106 Undertaking or Agreement)**

305. Southwark Plan Implementation Policy IP3 and Policy DF1 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. IP3 of the Southwark Plan Aims to ensure that any potential adverse impact that makes a proposed development unacceptable will be offset is mitigated by using planning conditions in the first instance. Additionally, and where they meet the required tests, Section 106 legal agreements that either a) mitigates the impact or b) pay the council a financial contribution to enable the council to will be used to mitigate the impact. 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

306. The application would be supported by the following Section 106 obligations:

<b>Planning obligation</b>	<b>Mitigation</b>	<b>Applicant's position</b>
<b>Local Economy and Workspace</b>		
Employment (Construction phase)	68 sustained jobs to unemployed Southwark residents, 68 short courses, and take on 17 construction industry apprentices during the construction phase, or meet the Employment and Training Contribution.  The maximum Employment and Training Contribution is £328,100 (£292,400 against sustained jobs, £10,200 against short courses, and £25,500 against construction industry apprenticeships).	Agreed

Employment (End use)	<p>214 sustained jobs for unemployed Southwark Residents at the end phase.</p> <p>The maximum Employment in the End Use Shortfall Contribution is £920,200 (based on £4300 per job).</p> <p>Skills and employment plan to the Council.</p>	Agreed
Affordable workspace	<p>Minimum 10% affordable workspace in Class E(g)(i) use at</p> <ul style="list-style-type: none"> <li>• 0-6 months – peppercorn rent</li> <li>• 7-13 months – 25% market rent</li> <li>• 14-23 months – 50% market rent</li> <li>• 24 months thereafter – 75% market rent</li> </ul> <p>Appointment of workspace coordinator</p> <p>Achieve minimum fit-out specification and submission of workspace strategy. Produce and submit an Affordable Workspace Marketing Plan.</p>	Agreed
Affordable workspace tenant eligibility	<p>Eligible tenants shall be, as per the definition given in the NSP, from a specific sector that has a social, cultural or economic development purpose. This would include:</p> <ul style="list-style-type: none"> <li>- charities, voluntary and community organisations or social enterprises;</li> <li>- creative and artists' workspace;</li> <li>- rehearsal and performance space and makerspace;</li> <li>- occupiers for disadvantaged groups starting up in any sector;</li> <li>- occupiers in support of educational outcomes through connections to</li> </ul>	Agreed



	<p>schools, colleges or higher education;</p> <ul style="list-style-type: none"> <li>- existing businesses in Southwark who need to relocate;</li> <li>- small businesses located in Southwark; and</li> <li>- start-ups or small businesses otherwise identified by the workspace provider to be agreed with the council.</li> </ul> <p>The Affordable Workspace Provider will retain discretion over the selection of the eligible tenants that take leases within the affordable workspace areas.</p>	
<b>Transport and Highways</b>		
Public Transport Infrastructure Contribution	<ul style="list-style-type: none"> <li>• Bus countdown facilities contribution of £40,000</li> <li>• A contribution towards the provision, extension and/ or maintenance of a TfL Cycle Hire Docking Station £50,000</li> <li>• A £18,000 contribution for a new Legible London sign/s and a map refresh of local existing Legible London signs</li> </ul>	Agreed
Highway works	s.278 works with the highway authority for highway works listed above, upgrade street lighting and traffic management change.	Agreed
Parking permit restriction	This development would be excluded from those eligible for car parking permits under the CPZ operating in this locality.	Agreed
Blue Badge Holder Parking Space	One Blue Badge Holder Parking Spaces which must be constructed prior to Occupation	Agreed

Construction management plan review and monitoring	Monitoring of Demolition and Construction Management Plan	Agreed
Delivery and Service Plan	Delivery and service plan monitoring of £16,730 with £1,600 retained.	Agreed
<b>Energy, Sustainability and the Environment</b>		
Futureproofing for connection to District Heat Network (DHN)	Prior to development, an Energy Strategy must be approved setting out how the development will be designed and built so that it will be capable of connecting to the District CHP in the future.	Agreed
Achieving net carbon zero	An off-set payment of £624,275  Review and re-calculation of on-site savings following detailed design stage  Be Seen Monitoring	Agreed
Archaeology monitoring/ supervision fund	Contribution towards cost of providing technical archaeological support (£11,171 for schemes over 10,000sqm)  £95,675 towards protecting, promoting and enhancing heritage assets within the vicinity, but in particular the Hope Theatre and bear baiting theatre.	Agreed
Achieving Greenfield rates	(£366 per cubic metre shortfall against greenfield run off rates)	Agreed
<b>Open space</b>		
Public realm	Public realm delivery and management, including hours of access.	Agreed

	<p>Prior to implementation, the developer is to submit a Public Realm Specification for all areas of publicly accessible realm. The Public Realm Specification shall demonstrate that the publicly-accessible realm has been designed to an adoptable standard (in accordance with the SSDM).</p> <p>Delivery of public realm prior to occupation of employment space.</p> <p>Joint Design Management and Framework with FT developer.</p>	
Public realm hours of access	<p>The publicly-accessible route shall be open between 08:00hrs and 20:00hrs every day of the week including Bank Holidays.</p> <p>All other areas of publicly-accessible realm within the application site shall be open 24 hours a day every day of the week including Bank Holidays.</p>	
<b>Other obligations</b>		
Detailed design clauses	Securing of BJARKE INGELS GROUP Architects to deliver detailed design unless otherwise agreed in writing.	Agreed
Administration fee	Maximum contribution to cover the costs of monitoring these necessary planning obligations, calculated as 2% of total sum. (excluding the DSP and those contributions that are either separate monitoring contributions or a monitoring contribution is already being collected for this particular obligation)	Agreed

307. The S106 heads of terms agreed would satisfactorily mitigate against the adverse impacts of the proposed development. In the event that a satisfactory legal agreement has not been entered into by 31 May 2023, it is recommended that the director of planning and growth refuses planning permission, if appropriate, for the following reason:

*“The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable workspace and mitigation against the adverse impacts of the development through projects or contributions in accordance with Policy IP3 ‘Community infrastructure levy (CIL) and Section 106 planning obligations’ of the Southwark Plan (2022), and London Plan (2021) policy DF1 ‘Delivery of the Plan and Planning Obligations’, as well as guidance in the council’s Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015)”.*

### **Mayoral and Southwark Community Infrastructure Levy (CIL)**

308. 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 investments in London as a whole, primarily Crossrail, while Southwark’s CIL will provide for infrastructure that supports growth in Southwark.
309. The site is located within Southwark CIL Zone 1 and MCIL2 Central London zone. Based on the existing floor areas provided in the agent’s CIL Form1 (GIA Info) dated 28-Apr-22 and their Area Schedule, the gross amount of CIL is approximately £4,562,416 consisting £3,098,179 of Mayoral CIL and £1,464,237 of Borough CIL. It should be noted that this is an estimate, and the floor areas on approved drawings will be checked when related CIL Assumption of Liability Form is submitted, after planning approval has been obtained.

### **Other matters**

310. None

### **Statement of community involvement**

311. Consultation was carried out by the applicant prior to the submission of the planning, and during the consideration of the application. The consultation undertaken was carried out with the local community and key stakeholders from the area. This is summarised in the tables below, which are taken from the submitted Statement of Community Involvement.

**Table: List of meetings and events**

<b>Events/Publicity</b>	<b>Date</b>	<b>Attendees</b>	<b>Notes</b>
<b>Public Consultation Stage 1</b>			
Newsletter	27 <sup>th</sup> September 2021	Delivered to over 1,700 local addresses	
Pop up sessions on Thames Pathway	Friday 8 <sup>th</sup> October 2021, 1pm – 4pm • Saturday 9 <sup>th</sup> October 2021, 10am – 1pm	91 people engaged.	Support for more green spaces and places to socialise – such as cafés. There was also support for public realm improvements and riverside seating.
Consultation website at <a href="http://www.redlioncourt.com">www.redlioncourt.com</a>	27 <sup>th</sup> September 2021 for 6 weeks	Online surveys 38 responses to survey	Strong support for enhancements to the Thames Pathway and public realm improvements • A particular desire for genuinely 'green' public realm • The desire for new social spaces, such as cafés and restaurants • Support for more office and creative spaces • Questions regarding the suitability of a taller/modern looking building in the location
<b>Public Consultation Stage 2</b>			
<b>Seek feedback on the emerging proposals for the Site</b>			
Newsletter	5 <sup>th</sup> November 2021	Delivered to over 1,700 local addresses	

door-to-door canvassing of residents on or around Park Street	15 <sup>th</sup> November 2021	112 addresses were visited over the course of the session, with 31 residents engaging in conversations with the team.	<p>Key concerns/priorities for consideration within the design process included impacts on neighbours (both visually and in terms of noise/disruption etc.), as well as support for local employment and community space.</p> <p>Support for more green spaces and improvements to the public realm, as well as for new shops</p>
Two drop-in sessions. These took place at The Bridge Café, 73-81 Southwark Bridge Road	<p>Wednesday 8th December 2021</p> <p>Saturday 11th December 2021</p>	13 attendees at the two drop-in sessions. These included representatives from Bankside Open Spaces Trust, Shakespeare's Globe and the Former FT Building development team.	
Consultation website at <a href="http://www.redlioncourt.com">www.redlioncourt.com</a>		18 responses to online survey	<p>Support for small businesses and affordable workspace, potentially for community use</p> <ul style="list-style-type: none"> <li>• Support for retail uses at ground floor – with shops preferred over bars and restaurants</li> <li>• Support for the proposed approach to improving pedestrian connections</li> </ul>

			<ul style="list-style-type: none"> <li>• Questions regarding the impact of the proposals on neighbours' amenity.</li> <li>• Concern about the height of the building.</li> </ul>
<b>Public Consultation Stage 3</b> <b>Seek feedback on the detailed proposals for the Site</b>			
Newsletter update and advert of events	3 <sup>rd</sup> February 2022	Delivered to over 1,700 local addresses	
Pop-up event was held on-site on the Thames Pathway	12 <sup>th</sup> March 2022	84 people engaged	
Drop-in session took place at The Bridge Café, 73-81 Southwark Bridge Road	16 <sup>th</sup> March 2022	10 attendees	
Consultation website at <a href="http://www.redlioncourt.com">www.redlioncourt.com</a>		27 responses to online survey	<p>Strong support for the proposed expansion of pedestrian routes and creation of public spaces around the building – with questions regarding the management of footfall at busy periods</p> <ul style="list-style-type: none"> <li>• Support for the creation of small retail spaces at ground floor level – with suggestions including a café/social space and wellness centre</li> <li>• Support for the delivery of high</li> </ul>



			<p>quality workspace on the Site – including affordable workspace</p> <ul style="list-style-type: none"> <li>• A mix of opinion on the proposed design approach – with some indicating support and others raising questions regarding the appropriateness of the proposed building to the local context and potential impacts on neighbours.</li> <li>• Proposed building would negatively impact the character of the area and the setting of the Anchor Pub.</li> </ul>
--	--	--	---

312. A number of key local stakeholders were also contacted via separate letters at each stage of the consultation process. Separate meetings were also held with the local stakeholders and councillors.
313. The final stage of the public consultation had included ‘you said, we did’ sections on key themes and presented to key local resident groups. The applicant had summarised the feedback and how they have responded to those. The project email address will remain open to receive feedback on the proposals for Red Lion Court. The applicant has continued to engage with the local community and residents and the nearby groups. In the event that the application is approved, the applicant will continue to engage with interested residents and stakeholders throughout the detailed design and construction processes. This is welcomed.
314. As part of its statutory requirements, the Council sent letters to surrounding residents, issued a press notice publicising the planning application and displayed notices in the vicinity of the site. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process.
315. Details of consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices. The responses received are summarised in an earlier part of this report. The main ‘Assessment’ part of this report addresses the issues raised.

## **Human rights implications**

- 316. This planning application engages certain human rights under the Human Rights Act 1998 (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.
- 317. This application has the legitimate aim of delivering commercial development. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

## **Conclusion on planning issues**

- 318. This application would bring into productive and optimised re-use of this currently vacant building, providing a complementary mixture of office and retail uses that would support the role and vibrancy of the Central Activities Zone and the Borough and Bankside District Town Centre. It would also provide a policy-compliant level of affordable workspace suitable for new and small businesses. The number of full time employees would increase on the site.
- 319. The proposed interior spaces and terraces have been designed to achieve separation distances sufficient to protect the privacy of all nearby residential properties. The proposed office and retail uses are not especially noise generating such that, with further protections secured in the form of management plans and hours of use controls, it is highly unlikely that nearby residents would experience noise disturbance. Conditions securing a construction management plan would also control noise and dust emissions. The proposal would cause daylight impacts in excess of the BRE guidance to a relatively small number of surrounding properties. However, in most cases the resulting daylight levels would not be uncommon for central London and in all instances the degree of change would not cause harm to the occupiers' amenity.
- 320. The tall building proposal would sit comfortably within the background context of Bankside. With its active frontages and new publicly-accessible external spaces, the development would provide a more engaging and animated building at street level, create greater public permeability, and bring valuable greening and biodiversity benefits to this part of the South Bank. The proposal would provide cycle parking on site and upgrade the public realm, which would improve the pedestrian experience along Bankside and Park Street. It satisfies the requirements of the Site Allocation NSP06.
- 321. It is considered that this development proposal would not have any noticeable adverse impact on the existing vehicular traffic on the adjoining roads. The applicant's Delivery and Servicing Plan sets out a sound strategy for minimising net additional vehicle movements to and from the site, a key part of which is to consolidate deliveries. Notwithstanding, and as a precautionary measure, a

bond will be secured so that highways impacts arising from deliveries and servicing can be monitored over the course of the first two years of operation. Other transport and highway mitigation measures would also be secured.

322. The proposed landscaping results in an increased UGF score of 0.35 meeting the London Plan target. Furthermore, biodiversity proposals would result in a net gain. The submitted biodiversity report concludes the development would lead to a gain of 349%.
323. The scheme would be designed to minimise environmental effects and adequate mitigation measures would be in place, which would be secured by conditions. The scheme would achieve 49% carbon emission reduction site-wide against a Building Regulations compliant scheme. It would also achieved an 'Outstanding' BREEAM rating, which exceeds the minimum of 'Excellent'.
324. It is therefore recommended that planning permission be granted subject to conditions, referral to the GLA and the applicant entering into a Section 106 Legal Agreement under the terms as set out above.

### **Consultation responses from external and statutory consultees**

325. Greater London Authority (GLA) had made the following comments based on the scheme originally submitted. The GLA would provide any further comments in the Stage II report.  
Below are the key issues:

- The principle of the use is strongly supported. London Plan Policy E1 supports an increase in the current stock of offices in certain locations, such as the CAZ. The space has been designed to be let to a single tenant or split for multiple tenancies. The scheme also secures affordable workspace.
- The other uses proposed would play an important role in the character and function of the Zone as a vibrant mixed-use area, ensuring activity and vitality at different times of the day and week. The other uses are supported.
- Neither the FT building or this site would provide residential uses as per the site allocation. On balance, the benefits offered by the provision of high-quality CAZ office floorspace and affordable workspace is considered to outweigh the non-provision of residential floorspace in this circumstance. As such, the proposed redevelopment of the site without residential floorspace remains supportable in strategic planning terms.
- Southwark's Local Plan identifies the site as being in a location suitable for tall buildings. As such, the proposal for an 11-storey building complies with the locational aspects of Part B of Policy D9.
- The design of the development should respond to its prominent, yet sensitive setting as an arrival point into Southwark from Southwark Bridge; and that redevelopment must be sensitive to the Thames Policy

Area, where building heights should be lower in close proximity to the River Thames.

- The Strategic Views have been tested and it would fully comply with the View Management Guidance set out for all relevant LVMF and London Borough of Southwark (LBS) Borough Views.
- The design of the colonnade needs to maximise views through it.
- Southwark Council should secure the proposed fire safety measures through appropriate conditions.
- The THVIA concludes that the proposed development would have no or negligible impact on the relevant LVMF Protected Vistas. The proposal would have a minor, neutral impact on LVMF River Prospect 10A.1 from Tower Bridge due to its distance and scale, resulting in little visibility in the view. It would have a major, beneficial effect on LVMF River Prospect 12B.1 from Southwark Bridge.
- Subject to the technical clarification sought, the proposed development is considered to maintain a viewer's ability to recognise and appreciate strategic landmarks and would not harm the character and composition of strategic views.
- The level of harm to the setting of the Grade II Listed Anchor Public House would be less than substantial. GLA Officers consider that the public benefits could (where appropriately secured) outweigh the less than substantial harm.
- Clarifications and supporting information on various aspects of the energy strategy and overheating is required.
- Connection to the network should be prioritised and evidence of active two-way correspondence with the network operator should be provided.
- The applicant has provided results that fall within the Whole Life Cycle benchmarks and has reasonably explained the reasons for any divergences from the WLC benchmark.
- Further consideration of Circular Economy principles is required.
- The surface water drainage strategy for the proposed development does not comply with Policy SI13 of the London Plan. The Applicant should confirm whether surface water pumping is required and aim to avoid this; confirm the inclusion of rainwater harvesting; and provide hydraulic calculations and a drainage strategy plan.
- Further information is required to determine compliance with London Plan air quality policies and conditions have been recommended.

Officer comment: Most of the comments above have been discussed in the main body of the report. The applicant had also addressed the majority of these (including those not listed above). The applicant has submitted the various supporting documents required by the GLA. A design document was submitted post these comments and notes amendment to the proposals to minimise the inset structural colonnade columns that sit behind the façade grid at ground level. This would also enable the corner columns to be eliminated, improving visibility and sense of space as well as increasing the size of the public realm offering and physical circulation space. No response on a have been provided by the GLA following this. They did however confirm that no further information

currently required on energy, whole life carbon or circular economy matters. The applicant also produced an updated Air Quality Assessment for the GLA, but the Council's own EPT officer had not raised any objections to the scheme. It is noted that there are a few matters that will need to be conditioned or agreed within the s106. Conditions for cycle parking and conditions regarding WLC, CES and Energy have been secured by condition.

326. Transport for London have made the following comments:

- A £18 000 contribution for a new Legible London sign/s and to enhance and map refresh of local existing Legible London signs should be secured.
- The development when considered in isolation is unlikely to have any unacceptable adverse residual impacts on the London Underground or bus network, however the Council would be supported in securing funding for bus capacity as a s106 pool with other developments in the area.
- To mitigate increased demand in an area of very high use a s106 contribution of £220 000 should be secured for a new cycle hire docking station or extended existing docking stations if a new docking station cannot be provided on site.
- An electric vehicle charging point should be provided for the disabled persons' parking bay.
- 719 long-stay cycle parking spaces are proposed, which accords with the minimum standards of Policy T5. Currently, the long stay cycle parking is not in accordance with the London Cycle Design Standards (LCDS), which is also a requirement of Policy T5. . Design amendments are required prior to determination in order to deliver a policy compliant scheme.
- In this instance it is accepted that the site is constrained and managed short stay provision for the office in the basement would be appropriate.
- The management regime should be explained and secured in a cycle parking management plan.
- The site access may have to be widened to accommodate servicing vehicles. To ensure that all servicing activity can be provided on site, measures to ensure that only vehicles with a maximum length of 8m will be servicing the site should be provided.
- Deliveries by cargo bike and small electric vans should be maximised, with overall number of vehicle trips minimised.
- It should be ensured that the proposed electric vehicle charging point is rapid charging and active from the outset.
- To align with Policy T7, given the site's location adjacent to the Thames and surrounding very narrow roads, use of the river and other sustainable modes for construction such as cargo bikes should be investigated.
- Safety of cyclists on NCN 4 on Park Street should be paramount and specific management measures explained in the CLP, along with measures to ensure the safety of pedestrians, noting that the northern footway of Park Street is proposed to be closed during construction.

- The measures set out in the Travel Plan proposed are not sufficient to encourage a modal shift towards active travel. It is recommended that further measures are proposed, e.g., free Santander Cycle Hire membership should be made available for a proportion of employees for each initial occupier for at least three years (in line with local policy).
- It is recommended that employees receive free or discounted repairs, particularly for small repairs such as punctured tyres.
- A full travel plan, which should be submitted for approval by the Council should be secured by condition/s106 agreement.

Office Comment: Much of the above have been discussed in the main section of the report. The applicant had sent a response to go through some of the details in particular the cycle parking standards and that has been found acceptable. In terms of the contributions and conditions requested, these would be secured. However, Officers consider that a £50,000 is more reasonable.

London Underground/DLR Infrastructure Protection was consulted and confirmed no comments to make.

327. Environment Agency was consulted but no comments were received.

328. Historic England:

Historic England provides advice when our engagement can add most value. In this case we are not offering advice.

329. Metropolitan Police Design Advisor:

A meeting was held with the design team dealing with this development at which the principles of Secured by Design were discussed. It is encouraging to see that the designers have considered Secured by Design, this will result in a positive impact upon the development from a safety and security perspective. Continued liaison with a designing out crime officer will enhance this. The design of the development has considered opportunity for natural surveillance, incorporates excellent lines of site and the development should 'activate' this area. These are all excellent crime prevention measures. The area around the site is to be landscaped as part of the planned re development. Planted areas should be well lit and not planted too densely as weapons are often stashed in dense planting.

330. The bottom of tree canopies should be maintained to be no lower than 2m and ground planting should not be allowed to grow any higher than 1m to ensure good lines of sight across the development are maintained. Any seating areas should not be under cover and should be designed in such a way to discourage rough sleeping, which is prevalent in this area. The gates that will be used to secure the landscaped area between 8pm and 8am are a positive addition that should assist with reducing the opportunity for crime and ASB between those hours. To be considered a 'secure' boundary these gates should be a minimum of 1.8m in height with no horizontal fixings that could be used as a climbing aid.

331. In relation to the office space, users should only be able to access the floor on which they work (unless a tenant has rented several floors for their business). There should be a concise delivery strategy, ideally one that removes the need for delivery persons to pass any further into the building than reception or service areas.

Officer Comment: This is noted and conditions securing Secure by Design measures are recommended.

332. London Fire Brigade was consulted but confirmed no observations to make.

333. Thames Water had made the following comments:

- With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Requested that a condition be added.
- with regard to foul water sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.
- With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection.
- This site is affected by wayleaves and easements within the boundary of or close to the application site. Thames Water will seek assurances that these will not be affected by the proposed development. The applicant should undertake appropriate searches to confirm this.
- There are public sewers crossing or close to the development. If planning significant work near our sewers, it's important that the developer minimize the risk of damage.
- Thames Water do not permit the building over or construction within 3m of water mains.
- The proposed development is located within 15m of our underground water assets and as such would like an informative attached to any approval granted.
- Water Comments. Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water requested that a condition in relation to additional flow/phasing plan be added to any planning permission.
- The applicant should fully explore discharge of SW to the River Thames, which is stated as both possible, pending conversations with the relevant authorities and the more sustainable solution than the combined network in the Drainage Strategy Report, but is not proposed (page 8). Because the north portion of the site already discharges to the river via gullies, it is likely physically possible, especially with the proposed SuDS. When the applicant can provide evidence that discharging surface water to the river is either proposed or has been fully explored and rejected due to factors outside the applicant's control, Thames Water will have no objection to this application. Regarding pumped foul drainage, we

support the applicant's efforts to minimise the amount of pumping required.

Officer Comment: The above is noted.

334. The advice received from other Southwark Officers has been detailed in the relevant sections contained within this report.

## **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

335. N/A

## **BACKGROUND DOCUMENTS**

<b>Background Papers</b>	<b>Held At</b>	<b>Contact</b>
Southwark Local Development Framework and Development Plan Documents	Environment, Neighbourhoods and Growth 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 5729 Council website: www.southwark.gov.uk

## **APPENDICES**

<b>No.</b>	<b>Title</b>
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policy
Appendix 3	Planning history of the site and nearby sites
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received



**AUDIT TRAIL**

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth		
<b>Report Author</b>	Wing Lau, Team Leader		
<b>Version</b>	Final		
<b>Dated</b>	17 February 2023		
<b>Key Decision</b>	No		
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>			
<b>Officer Title</b>		<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance		No	No
Strategic Director, Environment, Neighbourhoods and Growth		No	No
Strategic Director of Housing		No	No
<b>Date final report sent to Constitutional Team</b>			17 February 2023

**APPENDIX 1****RECOMMENDATION**

**Applicant** SOUTHWARK COUNCIL  
**Application Type** Full Planning Application

**Recommendation** Grant subject to s106 agreement

**Case Number** 22/AP/1602

**Draft of Decision Notice**

**Planning Permission was GRANTED for the following development:**

**At:** Red Lion Court, 46-48 Park Street, London

**In accordance with application received on**

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

PA-40-B2 Proposed Level B2 Floor Issue 29 Apr 22

PA-40-B1 Proposed Level B1 Floor Issue 29 Apr 22

PA-40-000 Proposed Ground Floor Plan Issue 27 Jan 23

PA-40-001 Proposed Level 01 Floor Plan Issue 02 Dec 22

PA-40-002 Proposed Level 02 Floor Plan Issue 02 Dec 22

PA-40-003 Proposed Level 03 Floor Plan Issue 02 Dec 22

PA-40-004 Proposed Level 04 Floor Plan Issue 02 Dec 22

PA-40-005 Proposed Level 05 Floor Plan Issue 02 Dec 22

PA-40-006 Proposed Level 06 Floor Plan Issue 02 Dec 22

PA-40-007 Proposed Level 07 Floor Plan Issue 02 Dec 22

PA-40-008 Proposed Level 08 Floor Plan Issue 02 Dec 22

PA-40-009 Proposed Level 09 Floor Plan Issue 29 Apr 22

PA-40-010 Proposed Level 09 Floor Plan Issue 29 Apr 22

PA-40-011 Proposed Roof Plan Issue 29 Apr 22

PA-40-100 Proposed Section A-A Issue 02 Dec 22

PA-40-101 Proposed Section B-B Issue 02 Dec 22

PA-40-102 Proposed Section C-C Issue 29 Apr 22

PA-40-103 Proposed Section D-D Issue 02 Dec 22

PA-40-104 Proposed Section E-E Issue 29 Apr 22

PA-60-100 Proposed North Context Elevation Issue 02 Dec 22

PA-60-101 Proposed South Context Elevation Issue 29 Apr 22

PA-60-102 Proposed East Context Elevation Issue 02 Dec 22

PA-60-103 Proposed West Context Elevation Issue 02 Dec 22

PA-60-200 Proposed North Elevation Issue 02 Dec 22

PA-60-201 Proposed South Elevation Issue 29 Apr 22

PA-60-202 Proposed East Elevation Issue 02 Dec 22

PA-60-203 Proposed West Elevation Issue 02 Dec 22

PA-70-001 Proposed Typical Façade Details Issue 29 Apr 22

PA-70-002 Proposed Typical North Façade Details Issue 29 Apr 22

PA-70-003 Proposed Typical Colonnade Façade Details Issue 02 Dec 22

PA-70-004 Proposed Typical Ground Floor Façade Details Issue 29 Apr 22

PA-70-005 Proposed Typical Pocket Terrace Façade Details Issue 29 Apr 22

PA-70-006 Proposed Typical Open Terrace Façade Details Issue 29 Apr 22

PA-70-007 Proposed Typical Roof Façade Details Issue 29 Apr 22

PA-80-001 Indicative Landscape General Arrangement Issue 27 Jan 23

PA-80-002 Indicative Landscape Roof Terrace Plan Issue 29 Apr 22

**Permission is subject to the following Time Limits:**

- 2 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.

**Pre-commencement condition(s)** - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work in connection with implementing this permission is commenced.

### 3 DEMP and CEMP

No development shall take place, including any works of demolition, until a written Development and Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to construction site management and to use all best endeavours to minimise off-site impacts, and will include the following information:

- o A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;
- o Site perimeter continuous automated noise, dust and vibration monitoring;
- o Engineering measures to eliminate or mitigate identified environmental impacts e.g. hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.;
- o Arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, residents liaison meetings, etc.)
- o A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme; Site traffic - Routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;
- o Site waste Management - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations.
- o A commitment that all NRMM equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated by the Mayor of London

To follow current best construction practice, including the following:-

- o Southwark Council's Technical Guide for Demolition & Construction at <http://www.southwark.gov.uk/construction>
- o Section 61 of Control of Pollution Act 1974,
- o The London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition',
- o The Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites',
- o BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Noise',
- o BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration'
- o BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration,
- o BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting,
- o Relevant Stage emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended & NRMM London emission standards <http://nrmm.london/>

All demolition and construction work shall be undertaken in strict accordance with the approved CEMP and other relevant codes of practice, unless otherwise agreed in writing by the Local Planning Authority.

#### Reason

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with Southwark Plan 2022 policies P50 ('Highways impacts') and P56 ('Protecting amenity'), policy T4 ('Assessing and mitigating transport impacts') of the London Plan 2021 and the National Planning Policy Framework 2021.

## 4 Constructions Logistics Plan

Prior to commencement of any works (including demolition),

- 1) An Enabling Construction Logistics Plan (covering demolition, below ground works, any works to the existing ground floor slab)
- 2) A Main Works Construction Logistics Plan (covering from ground slab upwards to completion of building) to manage construction vehicle movements to and from the site shall be submitted to and approved by the Local Planning Authority.

The CLP shall identify all efficiency and sustainability measures that will be taken during all the works of this development, and shall make firm commitments to smart procurement and collaboration (e.g. sharing suppliers) so as to minimise the number of construction vehicle trips.

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

Reason:

To ensure that construction works do not have an adverse impact on the transport network and to minimise the impact of construction activities on local air quality, in accordance with: the National Planning Policy Framework 2021, and; Policies T1 (Strategic Approach to Transport), T4 (Assessing and Mitigating Transport Impacts), T7 (Deliveries, Servicing and Construction) and SI 1 (Improving Air Quality) of the London Plan 2021.

## 5 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 Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

## 6 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 Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

## 7 Archaeological Pre-commencement 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 Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

## 8 Archaeological Public Engagement Programme

a) Prior to commencement of the development (excluding demolition and site investigation works) hereby permitted, the applicant shall submit to and receive the Local Planning Authority's approval of a Public Engagement Programme which shall set out:

1) How the field work areas will be hoarded to provide opportunities for passers-by to safely view the excavations;

2) Detailed drawings (artwork, design, text and materials, including their location and a full specification of the construction and materials) for the public interpretation and presentation display materials celebrating the historic setting of the site, which will be located on suitably visible public parts of the temporary site hoarding;

3) Details of at least one event, such as a heritage trail, that will be held during the field work phase (as a minimum this should state the date/time, duration, individuals involved and advance promotional measures for the event, and provide an outline of the content of the event);

b) Prior to the commencement of the fieldwork phase, the hoarding shall be installed in full accordance with the LPA-approved details referred to in parts a.1 and a.2 of the condition, and the hoarding shall remain as such and in place throughout the fieldwork phase.

c) During the fieldwork phase, the event (referred to in part a.3) shall be carried out.

Reason:

To promote the unique setting of the application site and provide information on the special archaeological and historical interest of this part of Southwark, in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2022.

## 9 Site Contamination

Prior to the commencement of any development, a phase 1 desktop study of the historic and current uses of the site and adjacent premises shall be carried out together with an associated preliminary risk assessment including a site walkover survey, identification of contaminants of the land and controlled waters and develop a conceptual model of the site with conclusion and recommendations whether a Phase 2 intrusive investigation is required.. This report shall be submitted to the Local Planning Authority for approval before the commencement of any intrusive investigations.

b) If the phase 1 site investigation reveals possible presence of contamination on or beneath the site or controlled waters, then, prior to the commencement of development works, an intrusive site investigation and associated risk assessment shall be completed to fully characterise the nature and extent of any contamination of soils and ground water on the site.

c) In the event that contamination is found that presents a risk to future users or controlled waters or other receptors, a detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing. The strategy shall detail all proposed actions to be taken to bring the site to a condition suitable for the intended use together with any monitoring or maintenance requirements. The scheme shall also ensure that as a minimum, the site should not be capable of being determined as contaminated land under Part IIA 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 and implemented as part of the development.

d) 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, together with any future monitoring or maintenance requirements shall be submitted to and approved in writing by the Local Planning Authority.

e) 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-d 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 the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances), and the National Planning Policy Framework 2021.

## 10 Detailed Drainage Design

Prior to commencement of groundworks (excluding site investigations and demolition), the applicant must submit a final detailed drainage design including drawings and supporting calculations to the Lead Local Flood Authority for review and approval, aligned with the 221109-4018-Responses to Planning Comments (09/11/2022) and associated drawings. Consideration should be shown to the implementation of rainwater harvesting. A detailed management plan confirming routine maintenance tasks for all drainage components and the maintenance owner must also be submitted to demonstrate how the drainage system is to be maintained for the lifetime of the development.

Reason:

To prevent the risk of flooding to and from the site in accordance with relevant policy requirements including but not limited to London Plan Policy SI 13, its associated Sustainable



Design and Construction SPG, the Non-Statutory Technical Standards for Sustainable Drainage Systems and Southwark's Local Plan Policy P68.

## 11 Tree Strategy

Prior to works commencing, full details of all proposed planting of a minimum 67 trees shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections, planting and maintenance specifications, use of guards or other protective measures and confirmation of location, species, sizes, nursery stock type, supplier and defect period. All tree planting shall be carried out in accordance with those details and at those times. Planting shall comply with BS5837: Trees in relation to demolition, design and construction (2012) and BS: 4428 Code of practice for general landscaping operations.

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

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 in accordance with The National Planning Policy Framework 2012 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.

## 12 Circular Economy Statement

Prior to works commencing, including any demolition and no later than RIBA Stage 4, a Pre-Construction Circular Economy Statement (CES) shall be submitted to and approved in writing by the Local Planning Authority. The CES shall include:

- a Bill of Materials including kg/m2 and recycled content (target for a minimum 20%) for the development;
- a Recycling and Waste Reporting table, evidencing that the proposal would reuse/recycle/recover 95% of construction and demolition waste, and put 95% of excavation waste to beneficial use;
- a Pre-demolition/Refurbishment Audit;
- a Letter of Commitment, pledging to submit a Post-Completion Report within 3 months of completion of the development;
- a Building End-of-Life Strategy;
- a Final Destination Facilities List; and

- evidence of any destination landfill sites' capacity to receive waste.

The development shall be implemented in accordance with the CES. Unless otherwise agreed by the Council, to comply with the Circular Economy Statement for the full life cycle of the Development.

Reason:

To reduce waste, increase material re-use and recycling, engender sustainable recycle behaviour among users and occupiers of the approved development, and conserve and make more efficient use of resources for as long as possible. This is in accordance with: the National Planning Policy Framework, and; Policies GG6 (Increasing Efficiency and Resilience) and SI7 (Reducing Waste and Supporting the Circular Economy) of the London Plan 2021.

**Commencement of works above grade** - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work above grade is commenced. The term 'above grade' here means any works above ground level.

### 13 Hard and Soft Landscaping

6 months prior to any landscaping works commencing, 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, available rooting space, tree pits, surfacing materials of any parking, access, or pathways layouts, materials and edge details), and the upper level external terraces 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 equivalent stem girth and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason: So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021; Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

### 14 Prior to works commencing, full details of all proposed planting of a minimum of 37 trees shall be submitted to and approved in writing by the Local Planning Authority. This will include tree

pit cross sections with soil volume calculations, planting and maintenance specifications and confirmation of location, species, sizes, nursery stock type 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.

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021, policy D4 ('Delivering good design') of the London Plan 2021 and policies P13 ('Design of places'), P14 ('Design quality') and P59 ('Green infrastructure') of the Southwark Plan 2022.

## 15 Biodiverse Green Roofs

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

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

The biodiversity (green/brown) roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency. The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Full Discharge of this condition will be granted once the green/brown roof(s) are completed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure), G5 (Urban Greening) of the London Plan 2021; Policy P59 (Green Infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

## 16 Landscape 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.

## 17 Prior to the any above grade work herby authorised begins details of bird and/or bat nesting boxes / bricks shall be submitted to and approved in writing by the Local Planning Authority.

No less than 3 No. bat bricks/tubes, 3 No. House Martin Nest boxes and 12 No. Swift 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 Chapter 15 (Conserving and enhancing the natural environment) of the National Planning Policy Framework (2021); Policy G6 (Biodiversity and access to nature) of the London Plan (2021); P56 Protection of amenity, P57 Open space, P58 Open Water space, P59 Green infrastructure, P60 Biodiversity, P66 Reducing noise pollution and enhancing soundscapes and P69 Sustainable standards of the Southwark Plan (2022).

## 18 Invertebrate habitats

Prior to the any superstructure work hereby authorised begins, details of Bee bricks and/or invertebrate hotels shall be submitted to and approved in writing by the Local Planning Authority.

No less than 3 No. Bee bricks and/or invertebrate hotels shall be provided and the details shall include the exact location, specification and design of the habitats. Bee bricks and/or

invertebrate hotels 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 Bee bricks and/or invertebrate hotels 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 invertebrate features and mapped locations and Southwark Council agreeing the submitted plans, and once the invertebrate features are installed in full in accordance to the agreed plans.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: G6 of the London Plan 2021, Policy P59 and P60 of the Southwark Plan 2022.

## 19 Section detail drawings

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

i. Facades (reveals etc.), including:

- Soffits of the cantilevering storeys;
- Junctions of exposed structural elements (columns, beams and floors);
- Head, cills and jambs of openings;
- Parapets and roof edges;
- Rooftop balustrades;

ii. Entrances (including any access sashes, security gates, entrance portals and awnings);

iii. Cycle store and service bay shutters;

iv. Typical windows;

v. Plant screening/ enclosure;

vi. Shopfront of the retail unit; and

vii. Signage zones;

viii. Gates and fencing to all external spaces;

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

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

Reason:

In order that the Local Planning Authority may be satisfied that the development achieve a quality of design and detailing, are suitable in context and consistent with the consented

scheme in accordance with: the National Planning Policy Framework 2021, policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

## 20 Materials Schedule and On-Site Presentation of Samples

Before any façade works of development hereby authorised begins:

a) A materials schedule providing the specification of materials to be used in the approved elevations in constructing the development hereby approved shall be submitted to and approved in writing by the LPA;

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

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

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, are suitable in context and consistent with the consented scheme in accordance with: the National Planning Policy Framework 2021, policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

## 21 Digital Connectivity

Prior to any above grade works of the development hereby approved, detailed plans shall be submitted to and approved in writing by the local planning authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within that phase of development. The development shall be carried out in accordance with these plans and maintained as such in perpetuity.

Reason:

To comply with SI 6 of the London Plan 2021.

## 22 Secure By Design

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 2021 and Southwark Plan 2022 policy P16 ('Designing out crime').

## 23 Cycle store

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

The submitted details shall show at least:

- 719 long-stay spaces;
- 167 short-stay spaces; and
- lockers, showers and any other end-of-journey facilities.

Reason:

In order to ensure that satisfactory safe and secure cycle parking and showering facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with: the National Planning Policy Framework 2021; Policy T5 ('Cycling') of the London Plan 2021 and P53 ('Cycling') of the Southwark Plan 2022.

## 24 BREEAM

(a) Before any fit out works to the Class E units hereby authorised begins, an independently verified BREEAM Design Stage report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum 'Excellent' rating (unless otherwise agreed by the local planning authority) 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 6 months of 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 2021, Southwark Plan 2022 policy P69 ('Sustainability standards') and Policy SI2 ('Minimising greenhouse gas emissions') of the London Plan 2021.

## 25 Commercial Kitchen Extract Ventilation

Prior to the commencement of the Class E(b) space use, full particulars and details of a scheme for the extraction and ventilation of the commercial kitchen shall be submitted to and approved by the Local Planning Authority. The scheme shall include:

- Details of extraction rate and efflux velocity of extracted air
- Full details of grease, particle and odour abatement plant
- The location and orientation of the extraction ductwork and discharge terminal
- A management \ servicing plan for maintenance of the extraction system

To ensure that fumes and odours from the kitchen do not affect public health or residential amenity. Once approved the scheme shall be implemented in full and permanently maintained thereafter.

### Reason

In order to ensure that any installed ventilation, ducting and ancillary equipment in the interests of amenity will not cause amenity impacts such as odour, fume or noise nuisance and will not detract from the appearance of the building in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P65 (Improving air quality), and the National Planning Policy Framework 2021.

**Pre-occupation condition(s)** - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before the building(s) hereby permitted are occupied or the use hereby permitted is commenced.

## 26 Biodiversity monitoring

Prior to the new development being first brought into use / occupied, a scheme for monitoring the effectiveness of the biodiversity mitigation and enhancement measures shall be submitted to and approved by the Local Planning Authority. This shall include:

Protected species surveys of created, habitats, botanical/bird/invertebrate surveys of created habitats, use of bird or bat boxes.

The monitoring shall be carried out and reported to the Local Planning Authority in accordance with the agreed scheme for a period of 30 years.



Monitoring reports should be undertaken for years 1,2,3,5,7,10,15,20,25 and 30.

Species results will be submitted to the London Biological Records Centre, Greenspace Information for Greater London (GIGL).

Reason:

To comply with the Biodiversity Net Gain requirements of the Environment Act 2021. To measure the effectiveness of biodiversity mitigation and/or enhancement measures, to see whether the measures achieve the expected biodiversity benefits in accordance with Chapter 15 (Conserving and enhancing the natural environment) of the National Planning Policy Framework (2021); Policy G6 (Biodiversity and access to nature) of the London Plan (2021); P56 Protection of amenity, P57 Open space, P58 Open Water space, P59 Green infrastructure, P60 Bioiversity, P66 Reducing noise pollution and enhancing soundscapes and P69 Sustainable standards of the Southwark Plan (2022).

## 27 Circular Economy Post Completion Report

Prior to occupation of the development, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement for that phase shall be submitted to the GLA at: [CircularEconomyLPG@london.gov.uk](mailto:CircularEconomyLPG@london.gov.uk), along with any supporting evidence as per the GLA's Circular Economy Statement Guidance.

Reason:

To ensure that Planning Stage Circular Economy Statement has been implemented in the construction and delivery of the development, and that all on-going operational measures and mechanisms have been satisfactorily implemented, in order to achieve Circular Economy goals and in accordance with: the National Planning Policy Framework, and; Policies GG6 (Increasing Efficiency and Resilience) and SI7 (Reducing Waste and Supporting the Circular Economy) of the London Plan 2021.

## 28 Whole Life Cycle

Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the building being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development should submit the post-construction Whole Life-Cycle Carbon (WLC) Assessment for that phase to the GLA at: [ZeroCarbonPlanning@london.gov.uk](mailto:ZeroCarbonPlanning@london.gov.uk).

The owner should use the post construction tab of the GLA's WLC assessment template and this should be completed accurately and in its entirety, in line with the criteria set out in the GLA's WLC Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.

Reason:

To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan 2021.

## 29 External Lighting and security

Prior to occupation of the development, details of external lighting and Security Surveillance Equipment Strategy) of all affected external areas (including areas beyond the boundary of the development) shall be submitted to and approved in writing by the Local Planning Authority.

The Strategy shall provide details of:

- design; power and position of luminaries; light intensity contours
- the dim-down and turn-off times of the lighting within or otherwise illuminating the roof terrace areas; and
- the security surveillance equipment to be installed on the building and within all external areas at all levels of the building.

Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILE) Guidance Note 1 for the reduction of obtrusive light (2020).

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 amenity and privacy of adjoining occupiers, and their protection from light nuisance and safety and security of persons using the area, in accordance with The National Planning Policy Framework 2021, London Plan policy G6 ('Biodiversity and access to nature') and Southwark Plan 2022 policies P56 ('Protection of amenity') and P60 ('Biodiversity').

- 30 Before the first occupation of any part of the development hereby approved, a Final Delivery and Servicing Management Plan (DSP) detailing how all parts of the site are to be serviced shall be submitted to and approved in writing by the Local Planning Authority. The Final DSP shall be based on the principles set out in the submitted Healthy Streets Transport Assessment dated April 2022 including details for the consolidation of deliveries through this development's facilities management and/or off-site consolidation centres.

The approved delivery and servicing plan shall be implemented in full accordance with the approved details from the first occupation of the development and shall be adhered to for the lifetime of the development.

Reason:

To ensure compliance with: Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2021); Policy T7 (Deliveries, servicing and construction) of the London Plan (2021) and Policy P50 (Highways Impacts) of the Southwark Plan (2022).

### 31 Travel Plan

a) Before the first occupation of any part of the development hereby approved, a Final Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall set out the measures to be taken to encourage the use of modes of transport other than the car by all users of the building, and shall give particular focus to active travel measures. The Final Travel Plan shall be based on the principles set out in the Framework Travel Plan (Appendix H of the submitted Healthy Streets Transport Assessment dated April 2022).

b) At the start of the second year of operation of the approved Final Travel Plan, a detailed Transport Methods Survey showing the methods of transport used by all those users of the development to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the LPA and the development shall not be carried out other in accordance with any such approval given.

Reason:

To ensure compliance with: Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2021); Policy T7 (Deliveries, servicing and construction) of the London Plan (2021) and Policy P50 (Highways Impacts) of the Southwark Plan (2022).

### 32 Plant Noise

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+A1:2019.

Suitable acoustic treatments shall be used to ensure compliance with the above standard. Prior to completion a validation test shall be carried out and the results submitted to the Local Planning Authority for approval in writing to demonstrate compliance with the above standard. Once approved the plant and any acoustic treatments shall be permanently maintained thereafter.

Reason

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

### 33 Urban Greening Certification

a) Prior to first occupation of development hereby consented, an interim report/letter (together with any supporting evidence) from a suitably qualified landscape specialist shall be submitted to and approved in writing by the LPA. The report/letter shall confirm that sufficient progress has been made in terms of detailed design, procurement and construction to be reasonably well assured that the development hereby approved will, once completed, achieve or exceed the agreed UGF score of 0.35. This should exclude the installation of green walls.

b) Within six months of first occupation of the development hereby permitted, a post construction certificate prepared by a suitably qualified landscape specialist (or other verification process agreed with the LPA) shall be submitted to and approved in writing by the LPA, confirming that the agreed UGF score of 0.35 has been met.

Reason:

To ensure the proposal complies with: the National Planning Policy Framework 2021; Policy G5 (Urban Greening) of the London Plan 2021 and policy P59 ('Green infrastructure') of the Southwark Plan 2022.

### 34 Drainage Verification

No building hereby permitted shall be occupied until evidence (photographs and installation contracts) is submitted to demonstrate that the sustainable drainage scheme for the site has been completed in accordance with the submitted details. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan for all of the proposed drainage components.

Reason:

To comply with the Non-Statutory Technical Standards for Sustainable Drainage Systems, the National Planning Policy Framework (Paragraph 103), the London Plan (Policies SI 12 and SI 13) along with associated guidance to these policies and Southwark's Local Plan Policy P68.

### 35 Electric Vehicle Charging Points

Prior to first occupation of the development hereby approved, the installation of active electric vehicle charger points for all spaces within the car parking area shall be installed and shall not be carried out otherwise in accordance with any such approval given.

Reason:

To encourage more sustainable travel in accordance with P54 Car Parking of the Southwark Plan 2022 and Policy T6 Car Parking of the London Plan 2021.

### 36 Water network

No development shall be occupied until confirmation has been provided that either:- 1). Surface water capacity exists off site to serve the development or 2). A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Or 3). All Surface water network upgrades required to accommodate the additional flows from the development have been completed.

Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents.

### 37 Noise from amplified music from non-residential premises

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 at 1m from the facade of nearby residential premises at all third octave bands between 63Hz and 8kHz. Prior to the commencement of use of the commercial premises the proposed scheme of sound insulation shall be submitted to the local planning authority for approval. The scheme of sound insulation shall be constructed and installed in accordance with the approval given and shall be permanently maintained thereafter. Following completion of the development and prior to the commencement of use of the commercial premises, a validation test shall be carried out. The results shall be submitted to the LPA for approval in writing.

#### 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 Southwark Plan 2022 Policy P56 (Protection of amenity).

### 38 Refuse Storage Facilities

Before the first occupation of any part of the development hereby approved, the refuse storage arrangements shown on the approved drawings shall be provided and made available for use by the occupiers. The refuse storage facilities shall thereafter be retained and the space used for no other purpose.

#### Reason:

To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with: the National Planning Policy Framework 2021 and policies P56 ('Protection of amenity') and P62 ('Reducing waste') of the Southwark Plan 2022.

- 39 Before the first occupation of the 'Micro retail' unit hereby approved, a ground floor plan detailing how the 'Micro retail' units would be arranged and designed shall be submitted to and approved in writing by the Local Planning Authority.

The approved plan shall be implemented in full accordance with the approved details from the first occupation of the development and shall be adhered to for the lifetime of the development.

Reason:

In granting this permission the Local Planning Authority has had regard to the site requirements set out in Site Allocation NSP06 of the Southwark Plan 2022.

**Compliance condition(s)** - the following condition(s) impose restrictions and/or other requirements that must be complied with at all times once the permission has been implemented.

- 40 Hours of use

With the exception of the cycle users existing via the cycle retail doors,

1) The retail units (Class E(a) and E(b) ) at ground floor level, which is located along the northern edge of the development hereby consented, shall be open for use and carried on only between: - 07:00hrs to 23:00hrs on Mondays to Saturdays;

- 08:00hrs to 23:00hrs on Sundays.

2) The retail units (Class E(a) ) at ground floor level, which is located along the southern edge of the development hereby consented, shall be open for use and carried on only between:

- 07:00hrs to 20:00hrs on Mondays to Saturdays;

- 09:00 to 20:00hrs on Sundays.

3) The Class E(e) uses hereby permitted shall not be carried on outside of the hours 06:00 to 23:00 on any day.

Reason

To safeguard the amenity of neighbouring residential properties in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

- 41 Land Use

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment of enactment of those Orders), the Class E use hereby permitted shall only be for Class E(g) uses.

At least 28,596sqm of the Class E use shall be offices Class E(g)(i).

At least 229sqm of the Class E use shall be retail Class E(a)

Reason:

In granting this permission the Local Planning Authority has had regard to the site requirements set out in Site Allocation NSP06 of the Southwark Plan 2022.

#### 42 Fire Safety Strategy

The development hereby consented shall not be carried out other than in accordance with the approved Fire Statement dated April 2022 by Astute Fire.

Reason:

To minimise the risk to life and minimise building damage in the event of a fire, in accordance with: the National Planning Policy Framework 2021, and; Policy D12 ('Fire safety') of the London Plan 2021.

#### 43 Energy Efficiency

The development hereby permitted shall be constructed in accordance with the approved Energy Statement dated April 2022 by Hilson Moran. All measures and technologies shall remain for as long as the development is occupied, unless as otherwise agreed in writing.

Reason:

To ensure the development complies with the National Planning Policy Framework 2021, Policy S1 2 of the London Plan 2021 and P70 of the Southwark Plan 2022.

#### 44 Roof Plant and Other Roof Structures

No roof plant, equipment or other structures, other than as shown on the drawings hereby approved or discharged under an 'approval of details' application pursuant to this Decision Notice, shall be placed on the roof or be permitted to project above the roofline of any part of the building as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosures of any building hereby permitted, unless otherwise approved by the LPA.

Reason:

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area, in accordance with: the National Planning Policy Framework 2021, Southwark Plan 2022 policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

#### 45 Restriction of Instatement of Appurtenances

With the exception of rainwater pipes, no meter boxes, flues, vents or pipes other than as shown on the drawings hereby approved or discharged under an 'approval of details' application pursuant to this permission, shall be fixed or installed on the elevations of the building, unless otherwise approved by the LPA.

Reason:

To ensure such works do not detract from the appearance of the building in accordance with: The National Planning Policy Framework 2021, Southwark Plan 2022 policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

#### 46 Restriction Telecommunications equipment

Notwithstanding the provisions of Parts 24 and 25 The Town & Country Planning [General Permitted Development] Order 1995 [as amended or re-enacted] no external telecommunications equipment or structures shall be placed on the roof or any other part of the building hereby permitted, unless otherwise approved by the LPA.

Reason:

In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with: The National Planning Policy Framework 2021, Southwark Plan 2022 policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

#### 47 Restriction of roofs for maintenance

With the exception of the designated rooftop external amenity spaces and terraces depicted on the approved drawings, all areas of roof within the development hereby consented shall be used only for the purposes of maintenance, repair or means of escape, and shall not be as outdoor amenity space by the occupiers or users of the premises.

Reason:

To ensure that the occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, in accordance with: the National Planning Policy Framework 2021 and P56 (Protection of Amenity) of the Southwark Plan 2022.

#### 48 Servicing hours

Any deliveries, loading and unloading to the development hereby consented shall take place only between the following hours: 08:00 to 20:00 on Monday to Saturday and 10:00 – 16:00 on Sundays and Bank Holidays.



Reason:

To ensure that the occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, and to reduce vehicle movements on the local road network during peak times, in accordance with: the National Planning Policy Framework 2021; Policy T7 (Deliveries, Servicing and Construction) of the London Plan 2021; P50 (Highway Impacts) and P56 (Protection of Amenity) of the Southwark Plan 2022.

49 Public realm hours of use

The western 'Pocket Park' of the development hereby approved, shall remain open for use by members of the public between 08:00hrs and 20:00hrs on Mondays to Sundays (including Bank Holidays). Outside of these hours of public access, controlled access into the western 'Pocket Park' shall be provided to employees of the commercial development hereby approved.

Reason:

To ensure that the occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, in accordance with: the National Planning Policy Framework 2021 and P56 (Protection of Amenity) of the Southwark Plan 2022.

50 External Terrace Hours of use

a) The external terraces located along the southern edge of the development hereby consented, and as shown on the drawing within the Terrace Management Plan shall be open for use and carried on only between 09:00hrs to 19:00hrs on Mondays to Sundays.

b) The external terraces located along the southern edge of the development hereby consented, and as shown on the drawing within the Terrace Management Plan shall be open for use and carried on only between 08:00 hrs to 23:00 on Mondays to Sundays.

The development hereby permitted shall be comply with the approved Terrace Management Plan dated 5 September 2022.

Reason:

To ensure that the occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, in accordance with: the National Planning Policy Framework 2021 and P56 (Protection of Amenity) of the Southwark Plan 2022.

51 Street furniture

With the exception of permanent furniture that would be installed within the public realm, no part of the external areas, including within the colonnade and under the soffits at ground floor level shall be used as external eating or drinking areas or for any other purpose shall be provided at any time in any external area.

Reason:

To ensure that the occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance and to ensure that the pedestrian routes would not be impeded, in accordance with: the National Planning Policy Framework 2021 and P56 (Protection of Amenity) of the Southwark Plan 2022.

## 52 Height

The buildings hereby approved shall have the following maximum storey height of 11 storeys (46.7 metres above Ordnance Datum for Upper Roof and 44.55 metres above Ordnance Datum for Lower Roof).

Reason:

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

**Special condition(s)** - the following condition(s) are required post completion of relevant condition imposed in other sections of this decision notice

## 53 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 Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

**Informative notes to the applicant relating to the proposed development**

## THAMES WATER

1. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

This site is affected by wayleaves and easements within the boundary of or close to the application site. Thames Water will seek assurances that these will not be affected by the proposed development. The applicant should undertake appropriate searches to confirm this. To discuss the proposed development in more detail, the applicant should contact Developer Services -

<https://www.thameswater.co.uk/developers>

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.

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://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)

**APPENDIX 2****RELEVANT PLANNING POLICY**National Planning Policy Framework

The revised National Planning Policy Framework ('NPPF') was published on 20 July 2021 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. Paragraph 218 states that the policies in the Framework are material considerations, which should be taken into account in dealing with applications.

The following chapters are relevant:

Chapter 2 Achieving sustainable development

Chapter 6 Building a strong, competitive economy

Chapter 8 Promoting healthy and safe communities

Chapter 9 Promoting sustainable transport

Chapter 11 Making effective use of land

Chapter 12 Achieving well-designed places

Chapter 14 Meeting the challenge of climate change, flooding and coastal change

Chapter 16 Conserving and enhancing the historic environment

New London Plan 2021 Policies

On 2 March 2021, the Mayor of London published the London Plan 2021. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London.

The relevant policies are:

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

Policy SD1 Opportunity Areas

Policy SD5 Offices, other strategic functions and residential development in the CAZ

Policy SD6 Town centres and high streets

Policy SD7 Town centres: development principles and Development Plan Documents

Policy SD8 Town centre network

Policy SD9 Town centres; Local partnerships and implementation

Policy SD10 Strategic and local regeneration

Policy D1 London's form, character and capacity for growth

Policy D2 Infrastructure requirements for sustainable densities

Policy D3 Optimising site capacity through the design-led approach

Policy D4 Delivering good design

Policy D5 Inclusive design

Policy D8 Public realm

Policy D9 Tall buildings

Policy D11 Safety, security and resilience to emergency

Policy D12 Fire safety

Policy D14 Noise

Policy H1 Increasing housing supply

Policy S1 Developing London's social infrastructure

Policy E1 Offices

Policy E2 Providing suitable business space

Policy E3 Affordable Workspace

Policy E8 Sector growth opportunities and clusters

Policy E9 Retail, market and hot food takeaways

Policy E11 Skills and opportunities for all

Policy HC1 Heritage conservation and growth

Policy HC3 Strategic and Local Views

Policy HC4 London View Management Framework

Policy G1 Green infrastructure

Policy G5 Urban greening

Policy G6 Biodiversity and access to nature

Policy G7 Trees and woodlands

Policy SI 1 Improving air quality

Policy SI 2 Minimising greenhouse gas emissions

Policy SI 3 Energy infrastructure

Policy SI 4 Managing heat risk

Policy SI 5 Water infrastructure

Policy SI 6 Digital connectivity infrastructure

Policy SI 7 Reducing waste and supporting the circular economy

Policy SI 8 Waste capacity and net waste self-sufficiency

Policy SI 12 Flood risk management

Policy SI 13 Sustainable drainage

Policy SI 17 Protecting and enhancing London's Waterways

Policy T1 Strategic approach to transport

Policy T2 Healthy Streets

Policy T3 Transport capacity, connectivity and safeguarding

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6 Car parking

Policy T7 Deliveries, servicing and construction

Policy T9 Funding transport infrastructure through planning

### Southwark Plan 2022

ST1 Southwark's Development targets

ST2 Southwark's Places

SP1a Southwark's development targets

SP1b Southwark's places

SP4 Green and inclusive economy

SP6 Climate Change

P12 Design of places

P13 Design quality

P16 Designing out crime

P17 Tall buildings

P18 Efficient use of land

P19 Listed Buildings and structures

P21 Conservation of the historic environment and natural heritage

P22 Borough views

P23 Archaeology

P24 World Heritage sites

P25 River Thames

P28 Access to employment and training

P30 Office and business development

P31 Affordable workspace

P44 Broadband and digital infrastructure

P45 Healthy developments

P49 Public transport

P50 Highways impacts

P51 Walking

P53 Cycling

P54 Car Parking

P55 Parking standards for disabled people and the mobility impaired

P56 Protection of amenity

P57 Open space

P59 Green infrastructure

P60 Biodiversity

P61 Trees

P62 Reducing waste

P64 Contaminated land and hazardous substances

P65 Improving air quality

P66 Reducing noise pollution and enhancing soundscapes

P67 Reducing water use

P68 Reducing flood risk

P69 Sustainability standards

P70 Energy

IP2 Transport infrastructure

IP3 Community infrastructure levy and section 106 planning obligations.

### Mayors SPD/SPGs

Mayor of London: Accessible London - Achieving an Inclusive Environment (SPG, 2004)

Mayor of London: Environment Strategy (2018)

Mayor of London: London View Management Framework (SPG, 2012)

Mayor of London: London World Heritage Sites (SPG, 2012)

Mayor of London: Planning for Equality and Diversity in London (SPG, 2007)

Mayor of London: Shaping Neighbourhoods - Character and Context (SPG, 2014)

Mayor of London: The Control of Dust and Emissions During Construction and Demolition (SPG, 2014)

Mayor of London: Transport (Strategy, 2018)

Mayor of London: Use of Planning Obligations in the Funding of Crossrail (SPG, 2016)

### Southwark SPDs/SPGs



Design and Access Statements (2007)

S106 and CIL (2015)

S106 and CIL Addendum (2017)

Sustainability Assessments (2007)

Sustainable Design and Construction (2009)

Sustainable Transport (2010)

**APPENDIX 3****PLANNING HISTORY**Relevant Site History

There is limited planning history on this site and the only relevant case is the EIA screening opinion.

**21/AP/4003** Application type: EIA screening

Request for an EIA Screening Opinion for demolition of the existing commercial office building and the redevelopment of the site with the construction of an 11 storeys (G+10) office led development with retail and restaurant space at ground floor and improved public realm.

Decision: Not required 08.12.2023

**APPENDIX 4****CONSULTATION UNDERTAKEN**

Site notice date: 24.05.2022

Press notice date: 26.05.22

Case officer site visit date: 26.05.22

Neighbour consultation letters sent: 20.05.22

**Internal services consulted**

Archaeology

Ecology

Environmental Protection

Highways Development and Management

Flood Risk Management & Urban Drainage

Transport Policy

Urban Forester

Waste Management

Section 106 Team and CiL team

Local Economy

**Statutory and non-statutory organisations**

Environment Agency

Bankside Open Spaces Trust

Better Bankside

Borough Market

Greater London Authority

Historic England

Health and Safety Executive

Transport for London

Metropolitan Police Service (Designing Out Crime)

Thames Water

National Grid

Network Rail

London Fire & Emergency Planning Authority

Fire and Emergency Department

London Underground

Natural England

Twentieth Century Society

UKPN

City of London

### **Neighbour and local groups consulted**

34 Maiden Lane London Southwark SE1 9HG

13 Perkins Square London Southwark SE1 9HU

9 Gatehouse Square London Southwark SE1 9HN

26 Maiden Lane London Southwark SE1 9HG

8 Gatehouse Square London Southwark SE1 9HN

5 Gatehouse Square London Southwark SE1 9HN

30 Maiden Lane London Southwark SE1 9HG

24 Maiden Lane London Southwark SE1 9HG

16 Maiden Lane London Southwark SE1 9HG

10 Maiden Lane London Southwark SE1 9HG

32 Maiden Lane London Southwark SE1 9HG

28 Maiden Lane London Southwark SE1 9HG

22 Maiden Lane London Southwark SE1 9HG

20 Maiden Lane London Southwark SE1 9HG

18 Maiden Lane London Southwark SE1 9HG

14 Maiden Lane London Southwark SE1 9HG

12 Maiden Lane London Southwark SE1 9HG

15 Perkins Square London Southwark SE1 9HU

10 Gatehouse Square London Southwark SE1 9HN

7 Gatehouse Square London Southwark SE1 9HN

6 Gatehouse Square London Southwark SE1 9HN

4 Gatehouse Square London Southwark SE1 9HN

17 Perkins Square London Southwark SE1 9HU

Unit 1 Benbow House 24 New Globe Walk London South

Flat 59 Benbow House 24 New Globe Walk London South

Flat 19 Benbow House 24 New Globe Walk London  
Sout

Cafe 1 Bear Gardens London Southwark SE1 9ED

Flat 61 Benbow House 24 New Globe Walk London  
Sout

Flat 33 Benbow House 24 New Globe Walk London  
Sout

Flat 37 Benbow House 24 New Globe Walk London  
Sout

Flat 67 Benbow House 24 New Globe Walk London  
Sout

Flat 50 Benbow House 24 New Globe Walk London  
Sout

Flat 31 Benbow House 24 New Globe Walk London  
Sout

Flat 9 Benbow House 24 New Globe Walk London  
South

Flat 69 Benbow House 24 New Globe Walk London  
Sout

Flat 36 Benbow House 24 New Globe Walk London  
Sout

Flat 74 Benbow House 24 New Globe Walk London  
Sout

Flat 71 Benbow House 24 New Globe Walk London  
Sout

Flat 66 Benbow House 24 New Globe Walk London  
Sout

Flat 64 Benbow House 24 New Globe Walk London  
Sout

Flat 58 Benbow House 24 New Globe Walk London  
Sout

Flat 56 Benbow House 24 New Globe Walk London  
Sout

Flat 53 Benbow House 24 New Globe Walk London  
Sout

Flat 51 Benbow House 24 New Globe Walk London  
Sout

Flat 49 Benbow House 24 New Globe Walk London  
Sout

Flat 46 Benbow House 24 New Globe Walk London  
Sout

Flat 44 Benbow House 24 New Globe Walk London  
Sout

Flat 41 Benbow House 24 New Globe Walk London  
Sout

Flat 38 Benbow House 24 New Globe Walk London  
Sout

Flat 30 Benbow House 24 New Globe Walk London  
Sout

Flat 28 Benbow House 24 New Globe Walk London  
Sout

Flat 25 Benbow House 24 New Globe Walk London  
Sout

Flat 23 Benbow House 24 New Globe Walk London  
Sout

Flat 20 Benbow House 24 New Globe Walk London  
Sout

Flat 17 Benbow House 24 New Globe Walk London  
Sout

Flat 14 Benbow House 24 New Globe Walk London  
Sout

Flat 11 Benbow House 24 New Globe Walk London  
Sout

Flat 8 Benbow House 24 New Globe Walk London  
South

Flat 6 Benbow House 24 New Globe Walk London  
South

1 Bear Gardens London Southwark SE1 9ED

Flat 16 Benbow House 24 New Globe Walk London  
Sout

Flat 48 Benbow House 24 New Globe Walk London  
Sout

Flat 47 Benbow House 24 New Globe Walk London  
Sout

Flat 45 Benbow House 24 New Globe Walk London  
Sout

Flat 43 Benbow House 24 New Globe Walk London  
Sout

Flat 42 Benbow House 24 New Globe Walk London  
Sout

Flat 40 Benbow House 24 New Globe Walk London  
Sout

Flat 39 Benbow House 24 New Globe Walk London  
Sout

Flat 35 Benbow House 24 New Globe Walk London  
Sout

Flat 34 Benbow House 24 New Globe Walk London  
Sout

Flat 32 Benbow House 24 New Globe Walk London  
Sout

Flat 29 Benbow House 24 New Globe Walk London  
Sout

Flat 27 Benbow House 24 New Globe Walk London  
Sout

Flat 26 Benbow House 24 New Globe Walk London  
Sout

Flat 24 Benbow House 24 New Globe Walk London  
Sout

Flat 22 Benbow House 24 New Globe Walk London  
Sout

Flat 21 Benbow House 24 New Globe Walk London  
Sout

Flat 18 Benbow House 24 New Globe Walk London  
Sout

Flat 15 Benbow House 24 New Globe Walk London  
Sout

Flat 13 Benbow House 24 New Globe Walk London  
Sout

Flat 12 Benbow House 24 New Globe Walk London  
Sout

Flat 10 Benbow House 24 New Globe Walk London  
Sout

Flat 7 Benbow House 24 New Globe Walk London  
South

Flat 5 Benbow House 24 New Globe Walk London  
South

22 Southwark Bridge Road London Southwark SE1  
9HB

Flat 73 Benbow House 24 New Globe Walk London  
Sout

Flat 72 Benbow House 24 New Globe Walk London  
Sout

Flat 70 Benbow House 24 New Globe Walk London  
Sout

Flat 68 Benbow House 24 New Globe Walk London  
Sout

Flat 65 Benbow House 24 New Globe Walk London  
Sout

Flat 63 Benbow House 24 New Globe Walk London  
Sout

Flat 62 Benbow House 24 New Globe Walk London  
Sout

Flat 60 Benbow House 24 New Globe Walk London  
Sout

Flat 57 Benbow House 24 New Globe Walk London  
Sout

Flat 55 Benbow House 24 New Globe Walk London  
Sout

Flat 54 Benbow House 24 New Globe Walk London  
Sout

Flat 52 Benbow House 24 New Globe Walk London  
Sout

The Rose Playhouse 56 Park Street London  
Southwark

Empire Warehouse Bear Gardens London  
Southwark SE1

Unit 2 133 Park Street London Southwark SE1 9EA

Units 2 To 3 Benbow House 24 New Globe Walk  
London

Second Floor 135 Park Street London Southwark  
SE1

Ground Floor 135 Park Street London Southwark  
SE1

First Floor 135 Park Street London Southwark SE1  
9



Anchor 1 Bankside London Southwark SE1 9DN

1 Gatehouse Square London Southwark SE1 9HN

Restaurant Rose Court 2 Southwark Bridge Road  
Lond

Flat 11 Old Theatre Court 123 Park Street London S

Penthouse Apartment Soho Wharf 1 Clink Street  
Lond

63 Park Street London Southwark SE1 9EA

79 Park Street London Southwark SE1 9EA

8 Maiden Lane London Southwark SE1 9HG

Flat 8 Old Theatre Court 123 Park Street London So

The Hub Lexington Catering Riverside House 2A  
Sout

Clink Prison Museum Soho Wharf 1 Clink Street  
Lond

Flat B Clink Wharf Clink Street London Southwark S

Ground Floor Right 30 Park Street London  
Southwark

Seventh Floor Rear Riverside House 2A Southwark  
Br

Sixth To Eighth Floors Excluding Seventh Floor Rea

Third Floor Soho Wharf 1 Clink Street London South

87 Park Street London Southwark SE1 9EA

Flat 2 28 Park Street London Southwark SE1 9EQ

Ground Floor To Fifth Floor And Eleventh Floor Riv

9 Perkins Square London Southwark SE1 9HU

Flat 12 Anchor Terrace 3-13 Southwark Bridge  
Road

Living Accommodation Anchor 1 Bankside London  
Sout

1 Bank End London Southwark SE1 9BU

225-227 Clink Street London Southwark SE1 9DG

Flat 26 Old Theatre Court 123 Park Street London S

3 Perkins Square London Southwark SE1 9HU

15 Gatehouse Square London Southwark SE1 9HN

1 Anchor Terrace 125 Park Street London Southwark

75 Park Street London Southwark SE1 9EA

59 Park Street London Southwark SE1 9EA

Flat 28 Old Theatre Court 123 Park Street London S

Flat 19 Old Theatre Court 123 Park Street London S

Fifth Floor Soho Wharf 1 Clink Street London South

Ground Floor Soho Wharf 1 Clink Street London Sout

69 Park Street London Southwark SE1 9EA

49 Park Street London Southwark SE1 9EA

9 Porter Street London Southwark SE1 9HD

34 Park Street London Southwark SE1 9EF

Flat 20 Anchor Terrace 3-13 Southwark Bridge Road

Flat 23 Old Theatre Court 123 Park Street London S

Flat 16 Old Theatre Court 123 Park Street London S

Flat 6 Old Theatre Court 123 Park Street London So

99 Park Street London Southwark SE1 9EA

77 Park Street London Southwark SE1 9EA

7 Stonecutters Lane London Southwark SE1 9RZ

6 Stonecutters Lane London Southwark SE1 9RZ

1 Stonecutters Lane London Southwark SE1 9RZ

Finance Plus Uk Ltd Rose Court 2 Southwark Bridge

Flat 21 Anchor Terrace 3-13 Southwark Bridge Road

89 Park Street London Southwark SE1 9EA

Flat 25 Old Theatre Court 123 Park Street London S

Flat 17 Old Theatre Court 123 Park Street London S

Flat 3 28 Park Street London Southwark SE1 9EQ

12 Gatehouse Square London Southwark SE1 9HN

Flat 11 Anchor Terrace 3-13 Southwark Bridge Road

Flat 3 Old Theatre Court 123 Park Street London So

Flat 6 Clink Wharf Clink Street London Southwark S

Fifth Floor Rose Court 2 Southwark Bridge Road  
Lon

Flat 7 28 Park Street London Southwark SE1 9EQ

Eighth Floor Riverside House 2A Southwark Bridge  
R

Flat 29 Anchor Terrace 3-13 Southwark Bridge Road

13 Porter Street London Southwark SE1 9HD

7 Porter Street London Southwark SE1 9HD

Apartment 1 Soho Wharf 1 Clink Street London  
South

Flat 9 Anchor Terrace 3-13 Southwark Bridge Road  
L

Flat 7 Anchor Terrace 3-13 Southwark Bridge Road  
L

Flat 52 Old Theatre Court 123 Park Street London S

Flat 5 Old Theatre Court 123 Park Street London So

Flat 2 Old Theatre Court 123 Park Street London So

Second Floor Soho Wharf 1 Clink Street London  
Sout

First Floor Soho Wharf 1 Clink Street London South

1 Perkins Square London Southwark SE1 9HU

Flat 25 Anchor Terrace 3-13 Southwark Bridge Road

Flat 16 Anchor Terrace 3-13 Southwark Bridge Road

2 Anchor Terrace 125 Park Street London  
Southwark

Flat 31 Old Theatre Court 123 Park Street London S

Flat 7 Old Theatre Court 123 Park Street London So

83 Park Street London Southwark SE1 9EA

71 Park Street London Southwark SE1 9EA

Unit 3 Riverside House 2A Southwark Bridge Road  
Lo

Arch 230 Bank End London Southwark SE1 9FJ

Arch 229 Bank End London Southwark SE1 9FJ

Mindshare Media Ltd Rose Court 2 Southwark  
Bridge

1 Porter Street London Southwark SE1 9HD

Flat 14 Anchor Terrace 3-13 Southwark Bridge  
Road

45 Park Street London Southwark SE1 9EA

2 Maiden Lane London Southwark SE1 9HG

Unit 4 Riverside House 2A Southwark Bridge Road  
Lo

65 Park Street London Southwark SE1 9EA

Waterside Apartment Clink Wharf Clink Street  
Londo

6 Maiden Lane London Southwark SE1 9HG

11 Porter Street London Southwark SE1 9HD

11 Perkins Square London Southwark SE1 9HU

5 Perkins Square London Southwark SE1 9HU

Flat 10 Anchor Terrace 3-13 Southwark Bridge  
Road

Flat 35 Old Theatre Court 123 Park Street London S

Flat 20 Old Theatre Court 123 Park Street London S

Flat 5 Clink Wharf Clink Street London Southwark S

Flat 2 Clink Wharf Clink Street London Southwark S

93 Park Street London Southwark SE1 9EA

85 Park Street London Southwark SE1 9EA

Apartment 2 Soho Wharf 1 Clink Street London  
South

First Floor 30 Park Street London Southwark SE1  
9E

Flat 8 28 Park Street London Southwark SE1 9EQ

Flat 5 28 Park Street London Southwark SE1 9EQ

Sixth Floor Riverside House 2A Southwark Bridge  
Ro

3 Stonecutters Lane London Southwark SE1 9RZ

Rose Court 2 Southwark Bridge London Southwark  
SE1

1A Bank End London Southwark SE1 9BU

Flat 19 Anchor Terrace 3-13 Southwark Bridge  
Road

Flat 6 28 Park Street London Southwark SE1 9EQ

Flat 7 Clink Wharf Clink Street London Southwark S

15 Porter Street London Southwark SE1 9HD

Flat 39 Old Theatre Court 123 Park Street London S

Flat 33 Old Theatre Court 123 Park Street London S

53 Park Street London Southwark SE1 9EA

Fifth Floor North Rose Court 2 Southwark Bridge Ro

19 Porter Street London Southwark SE1 9HD

Flat 27 Anchor Terrace 3-13 Southwark Bridge  
Road

3 Anchor Terrace 125 Park Street London  
Southwark

73 Park Street London Southwark SE1 9EA

Health And Safety Executive Rose Court 2  
Southwark

Flat 4 28 Park Street London Southwark SE1 9EQ

The Real Greek Riverside House 2A Southwark  
Bridge

Seventh Floor Front Riverside House 2A Southwark  
B

Arch 221 Clink Street London Southwark SE1 9SQ

8 Stonecutters Lane London Southwark SE1 9RZ

4 Stonecutters Lane London Southwark SE1 9RZ

Flat 1 28 Park Street London Southwark SE1 9EQ

Flat 8 Anchor Terrace 3-13 Southwark Bridge Road  
L

Flat 10 Old Theatre Court 123 Park Street London S  
57 Park Street London Southwark SE1 9EA

Flat A Clink Wharf Clink Street London Southwark S  
Fourth Floor And Fifth Floor 30 Park Street London  
11 Gatehouse Square London Southwark SE1 9HN

Flat 26 Anchor Terrace 3-13 Southwark Bridge  
Road

97 Park Street London Southwark SE1 9EA

Tenth Floor Riverside House 2A Southwark Bridge  
Ro

5 Porter Street London Southwark SE1 9HD

Flat 18 Anchor Terrace 3-13 Southwark Bridge  
Road

Flat 13 Anchor Terrace 3-13 Southwark Bridge  
Road

Flat 12 Old Theatre Court 123 Park Street London S  
95 Park Street London Southwark SE1 9EA

91 Park Street London Southwark SE1 9EA

Second Floor 30 Park Street London Southwark  
SE1 9

Pret A Manger Riverside House 2A Southwark  
Bridge

Pret A Mange Riverside House 2A Southwark  
Bridge R

Flat 32 Old Theatre Court 123 Park Street London S

5 Anchor Terrace 125 Park Street London  
Southwark

4 Anchor Terrace 125 Park Street London  
Southwark

81 Park Street London Southwark SE1 9EA

61 Park Street London Southwark SE1 9EA

55 Park Street London Southwark SE1 9EA

51 Park Street London Southwark SE1 9EA

47 Park Street London Southwark SE1 9EA  
 43 Park Street London Southwark SE1 9EA  
 4 Maiden Lane London Southwark SE1 9HG  
 17 Porter Street London Southwark SE1 9HD  
 3 Porter Street London Southwark SE1 9HD  
 7 Perkins Square London Southwark SE1 9HU  
 13 Gatehouse Square London Southwark SE1 9HN  
 Flat 22 Anchor Terrace 3-13 Southwark Bridge Road  
 Flat 15 Anchor Terrace 3-13 Southwark Bridge Road  
 Flat 38 Old Theatre Court 123 Park Street London S  
 Flat 36 Old Theatre Court 123 Park Street London S  
 Flat 29 Old Theatre Court 123 Park Street London S  
 Flat 27 Old Theatre Court 123 Park Street London S  
 Studio 30 Soho Wharf 1 Clink Street London Southwa  
 Flat 1 Clink Wharf Clink Street London Southwark S  
 Flat 6 Anchor Terrace 3-13 Southwark Bridge Road L  
 Apartment 3 Soho Wharf 1 Clink Street London South  
 Third Floor 30 Park Street London Southwark SE1 9E  
 Studio 2 Clink Wharf Clink Street London Southwark  
 The Mezz Riverside House 2A Southwark Bridge Road  
 5 Stonecutters Lane London Southwark SE1 9RZ  
 2 Stonecutters Lane London Southwark SE1 9RZ  
 Lower Ground Floor Soho Wharf 1 Clink Street Londo  
 Flat 1 Old Theatre Court 123 Park Street London So  
 67 Park Street London Southwark SE1 9EA  
 14 Gatehouse Square London Southwark SE1 9HN

2 Gatehouse Square London Southwark SE1 9HN

Flat 4 Clink Wharf Clink Street London Southwark S

Flat 28 Anchor Terrace 3-13 Southwark Bridge Road

Flat 24 Anchor Terrace 3-13 Southwark Bridge Road

Flat 17 Anchor Terrace 3-13 Southwark Bridge Road

Flat 37 Old Theatre Court 123 Park Street London S

Flat 30 Old Theatre Court 123 Park Street London S

Flat 22 Old Theatre Court 123 Park Street London S

Flat 13 Old Theatre Court 123 Park Street London S

Studio 1 Clink Wharf Clink Street London Southwark

Ninth Floor Riverside House 2A Southwark Bridge Road

1 Southwark Bridge Road London Southwark SE1 9EU

Fourth Floor Soho Wharf 1 Clink Street London Sout

3 Gatehouse Square London Southwark SE1 9HN

Flat 23 Anchor Terrace 3-13 Southwark Bridge Road

Flat 53 Old Theatre Court 123 Park Street London S

Flat 51 Old Theatre Court 123 Park Street London S

Flat 50 Old Theatre Court 123 Park Street London S

Flat 21 Old Theatre Court 123 Park Street London S

Flat 18 Old Theatre Court 123 Park Street London S

Flat 15 Old Theatre Court 123 Park Street London S

Flat 9 Old Theatre Court 123 Park Street London So

Flat 3 Clink Wharf Clink Street London Southwark S

Ground Floor Left 30 Park Street London Southwark

Arch 232 Bank End London Southwark SE1 9FJ

Arch 231 Bank End London Southwark SE1 9FJ



**APPENDIX 5****CONSULTATION RESPONSES RECEIVED****Statutory and non-statutory organisations**

Greater London Authority  
 Historic England  
 Transport for London  
 Metropolitan Police Service (Designing Out Crime)  
 London Fire & Emergency Planning Authority  
 London Underground  
 Thames Water

**Neighbour and local groups**

51 Park Street London SE1 9EA  
 53 Park Street London SE1 9EA  
 23 Park Street London SE1 9EQ  
 57 Park Street London SE1 9EA  
 55 Park Street London SE1 9EA  
 21 New Globe Walk London SE1 9DT  
 5-7 Marshalsea Road London Southwark SE1 1EP  
 47 Park Street London SE1 9EA  
 45 Park Street London SE1 9EA  
 Flat 7, 5 Plantain Place London SE1 1YN  
 11, Old Theatre Court 123 Park street London SE1 9ES  
 Flat 3 old Theatre Court 123 Park Street London SE1 9ES  
 2 Old Theatre Court 123 Park Street London SE1 9ES  
 16 Old Theatre Court London SE1 9ES  
 91 Park Street, London SE1 9EA  
 Flat 18 Old Theatre Court London SE1 9ES  
 Bourne House Cores End Road Bourne End Bucks SL8 5AR  
 5 Endeavour Square london E20 1JN  
 18 Great Guildford Street London  
 5 Porter Street London  
 1 Porter Street London  
 3 Porter Street London  
 87 Park Street London  
 85 Park Street London  
 83 Park Street London  
 81 Park Street London  
 15 Perkins Square London  
 5 Perkins Square London  
 345 Devon Mansions Tooley Street London

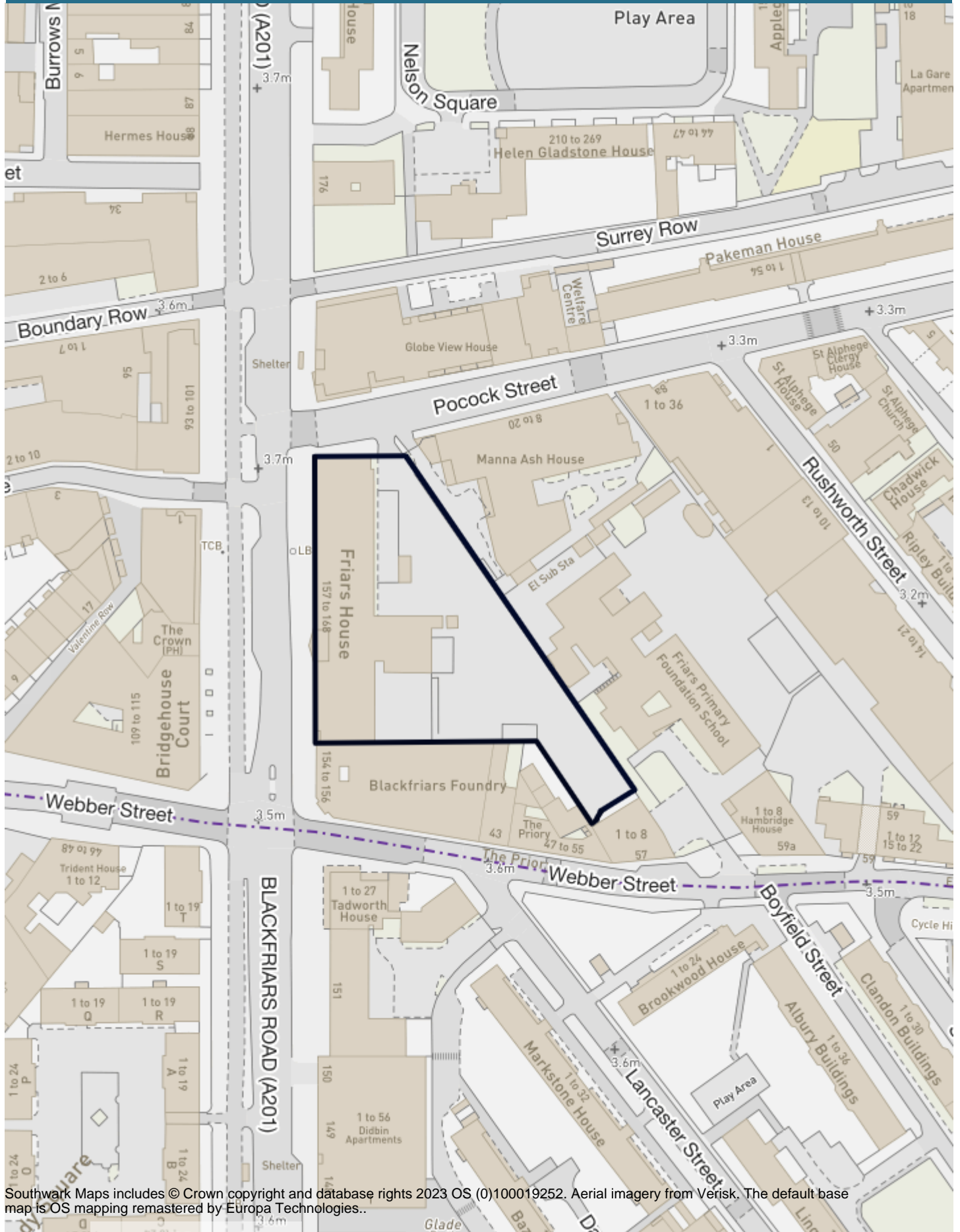
22 Park Street London  
73 Park Street London  
79 Park Street London  
77 Park Street London  
4A Redcross Way London  
33 Park Street London  
521 Caraway Apartments London  
31 Anchor Brewhouse Shad Thames London  
32 Shad Thames 203 spice quay heights London  
Flat 19 Compass Court London  
Crosby Row London  
2 Maiden Lane London  
8 Maiden Lane London  
12 Maiden Lane London  
18 Maiden Lane London  
91 Park Street London  
112 Southgate Road London  
119 Chrisp Street 407 Apartament London

# Agenda Item 5.2



22/AP/3049

160 Blackfriars Road, London, Southwark SE1



Southwark Maps includes © Crown copyright and database rights 2023 OS (0)100019252. Aerial imagery from Verisk. The default base map is OS mapping remastered by Europa Technologies..

Scale =

23-Feb-2023

EXECUTIVE SUMMARY .....	4
BACKGROUND INFORMATION .....	4
Site location and description .....	5
Details of proposal .....	7
Consultation responses from members of the public and local groups .....	15
Planning history of the site, and adjoining or nearby sites .....	15
KEY ISSUES FOR CONSIDERATION .....	17
Summary of main issues.....	17
Legal context .....	17
Planning policy and material considerations .....	18
ASSESSMENT.....	18
Principle of the proposed development in terms of land uses.....	18
Environmental impact assessment .....	23
Design and heritage.....	23
Quality of accommodation .....	27
Impact of proposed development on amenities of adjoining occupiers and surrounding area.....	30
Impact of adjoining and nearby uses on occupiers and users of the proposed development .....	37
Archaeology.....	37
Sustainable development implications.....	37
Trees, landscaping and ecology .....	41
Transport and highways.....	41
Planning obligations and Community Infrastructure Levy .....	43
Other matters.....	46
Community involvement and engagement.....	47
Community impact and equalities assessment.....	53
Human rights implications.....	54
Positive and proactive statement .....	54
Positive and proactive engagement: summary table.....	54
CONCLUSION .....	54
BACKGROUND DOCUMENTS.....	55

APPENDICES .....	55
AUDIT TRAIL .....	56

<b>Item No.</b> 5.2	<b>Classification:</b> Open	<b>Date:</b> 8 March 2023	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<p><b>Development Management planning application:</b> Application 22/AP/3049 for: Full Planning Application</p> <p><b>Address:</b> 160 BLACKFRIARS ROAD, LONDON SE1</p> <p><b>Proposal:</b> Minor material amendments by variation of Condition 1 'Approved Plans' and Condition 30 'Number of Hotel Bedrooms' of planning permission ref. 20/AP/0556 (Erection of an eight storey building with basement, comprising a hotel (Class C1), flexible commercial or community unit (Class B1/D1), retail floorspace (Class A1/A3), creation of public space, landscaping and associated works. Works to the existing office building at ground and roof levels (including a new rooftop terrace, balustrades and PV panels); elevational alterations; and alterations associated with the creation of a new entrance on the Blackfriars Road elevation).</p> <p>The proposed changes are to:</p> <ul style="list-style-type: none"> <li>• increase the number of hotel bedrooms by 53 to 222 with revised layout;</li> <li>• make changes to the design (including changes to the footprint and massing by extending into the south-eastern corner near to the Webber Street boundary and into the northern corners behind the office building, and changes to windows) that result in an increase of 292sqm GEA of hotel floorspace;</li> <li>• revise the red line application site to take in part of the ground floor of the existing building;</li> <li>• increase the affordable workspace area by 96sqm;</li> <li>• revise the existing ground floor office, and the layout of the hotel entrance and reception area; amend the frontage to the courtyard space;</li> <li>• and amend the energy strategy.</li> </ul>		
<b>Ward(s) or groups affected:</b>	Borough and Bankside		
<b>From:</b>	Director of Planning and Growth		
<b>Application Start Date</b>	13/09/22	<b>PPA Expiry Date</b>	n/a
<b>Earliest Decision Date</b>	14/10/22		

## RECOMMENDATIONS

1. That an amended planning permission be granted subject to revised conditions

to those imposed on the 2020 permission, and the completion of a deed of variation to the original legal agreement.

2. That in the event that the requirements of paragraph 1 above are not met by 8 June 2023, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 174.

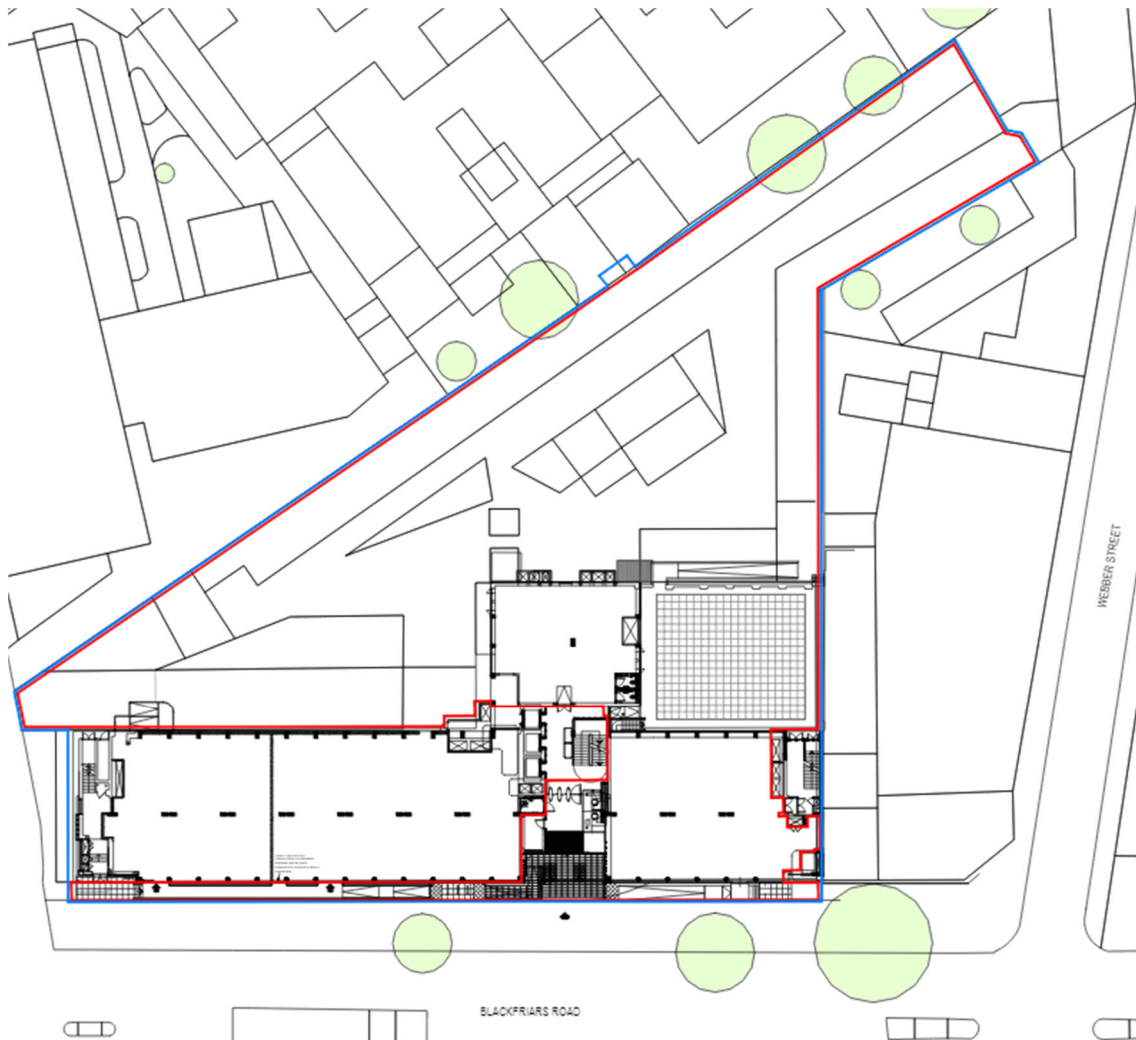
## **EXECUTIVE SUMMARY**

3. This minor material amendment (section 73) application seeks changes to a hotel-led scheme that was approved permission by ref. 20/AP/0556 in September 2020. It seeks to increase the number of hotel rooms, make changes to the footprint and appearance of the building, and alter the ground floor layout.
4. Eight objections were received from the community including objections to a hotel on this site, the increased numbers of hotel rooms the changes to the design, how the site would be better used by other uses, the impact on neighbour amenity and increased transport effects from having more hotel rooms. One comment in support was received. Internal and external consultees did not raise objections to the proposal.
5. While the proposed hotel rooms are smaller than the approved scheme as part of the redesign to include more rooms, the overall quality of the accommodation would remain acceptable and the hotel reception would continue to provide publicly accessible facilities. The public benefit of the new courtyard would remain as the approved scheme, and an enlarged affordable workspace and community unit is proposed. The proposed amendments do not substantially increase the massing of the hotel building and it retains the architectural style of the approved building; the scheme remains of an acceptable design that would not harm the townscape. The impacts on daylight and sunlight to surrounding properties are similar to those of the approved scheme. No additional transport mitigation measures (such as financial contributions, highway works and management plans) are necessary beyond those secured in the 2020 permission.
6. The proposed conditions have updated those on the 2020 permission to reflect the changes proposed, the conditions that have been partly approved for works at the front of the site, and to reflect the recently adopted development plan policies. A deed of variation would be necessary to amend certain clauses and definitions within the 2020 section 106 agreement.
7. Subject to the completion of a deed of variation and the recommended conditions, the application is recommended for approval to grant planning permission for the revised scheme.

## **BACKGROUND INFORMATION**

## Site location and description

8. The application site is the existing office building, rear car park and service yard located at 160 Blackfriars Road. The existing nine-storey building is known as Friars House, and is occupied by Class E retail uses at ground floor level and Class E office space on all upper levels. The existing building is broadly 'T' shaped and extends along the Blackfriars Road frontage of the 0.42 hectare triangular plot. There is a large car park (67 parking spaces) and service yard to the rear on the eastern side, which is accessed from Pocock Street and extends to the south-east, up to the rear of the Webber Street properties.
9. The site's main elevation fronts Blackfriars Road, and is bound by Pocock Street to the north; Manna Ash House (student halls of residence) to the north east; Friars Primary Foundation School to the east; and The Priory and Blackfriars Foundry to the south on Webber Street.



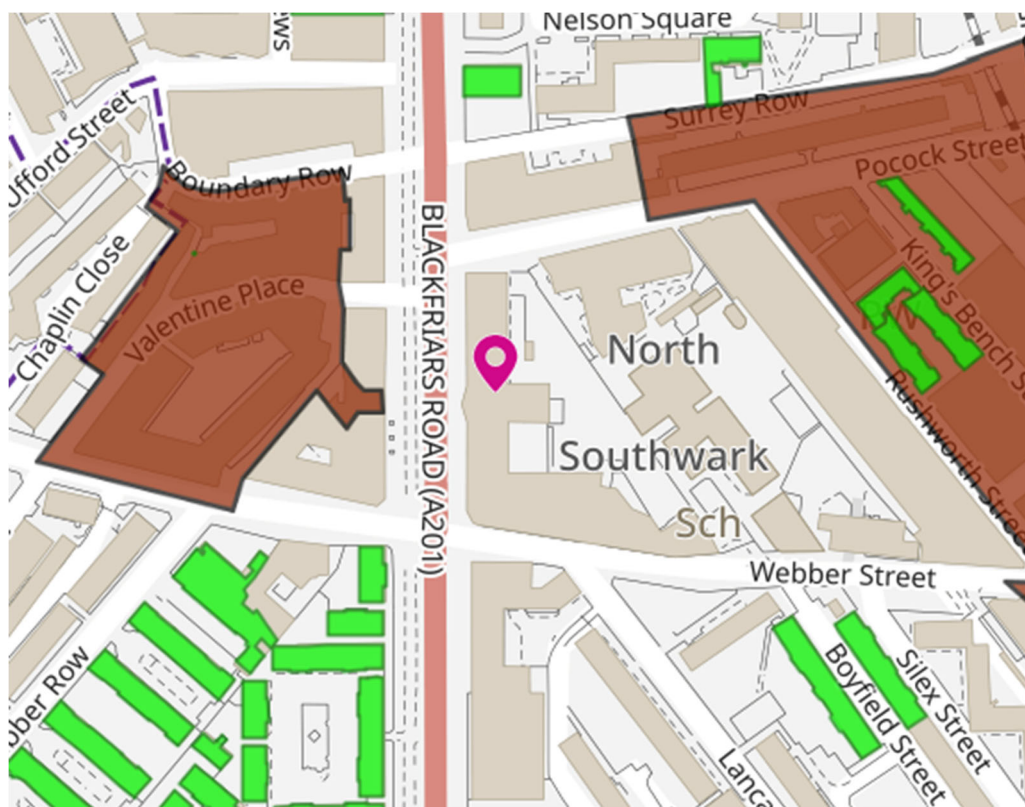
*Site plan (north is to the left)*

10. The area comprises a variety of building heights and uses, as well as a mix of modern and heritage buildings. To the north of the site, Globe View House has ten storeys (in residential use) and to the north-east Manna Ash House has eight



storeys (student housing and ground floor offices). The school to the east has single storey buildings and playgrounds. To the east and south on Rushworth Street and Webber Street the buildings are typically lower rise, in the region of three- to five-storeys in height that provide office and residential uses. The recently constructed residential-led buildings on Rushworth Street are six- and eight-storeys.

11. The site is to the south of, and separate from, the established tall buildings cluster at the northern end of Blackfriars Road.
12. The site forms the majority of Southwark Plan site allocation NSP17 'Friars House, 157-168 Blackfriars Road'. The site is within the Central Activities Zone, the Bankside and Borough district town centre, the Bankside, Borough and London Bridge Opportunity Area, and South Bank Strategic Cultural Quarter. It is also within the air quality management area and flood zone 3.
13. Blackfriars Road is a classified A road with a cycle superhighway and several bus routes which, together with the proximity of both Waterloo East railway station and Southwark Underground station, give the site a high PTAL of 6B indicating an excellent level of access to public transport.



*Map of the site (with pin) and nearby heritage assets*

14. The site is not located within a conservation area nor are there any listed buildings nor structures within the application site. It is close to two conservation areas, the Valentine Place Conservation Area 30m to the west, and the King's Bench Conservation Area 50m to the north-east (shown in brown in the diagram above). The Blackfriars Foundry (on the corner with Webber Street) is a building

of townscape merit. The site is close to the following listed buildings, shown in green on the diagram above:

- The grade II listed Former Sons of Temperance Friendly Society Building, 60m to the north on Blackfriars Road.
- The grade II listed Blackfriars Settlement and its railings on Surrey Row and Nelson Square, 100m to the north-east.
- The grade II listed Ripley, Chadwick and Merrow Houses on Rushworth Street (100m to the east of the site), and the Drapers Almshouses on Glasshill Street (130m to the east).
- The grade II listed Albury House and Clandon House – 50m to the south-east of the site on Boyfield Street.
- The grade II listed Peabody Buildings – 40m to the south-west of the site on Blackfriars Road.

## Details of proposal

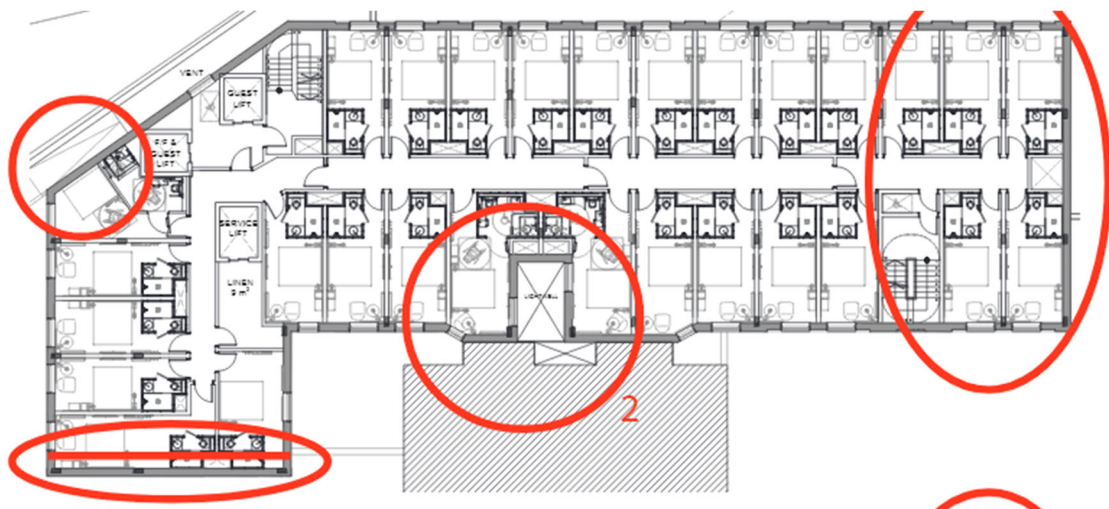
15. This minor material amendment application seeks to make revisions to the permission for a hotel-led scheme on this site, approved by reference 20/AP/0556. The proposed changes are to the physical form of the approved hotel building, its interior layout and to make changes to the ground floor of the existing office building. The 2020 permission has been implemented for the works to the Blackfriars Road frontage in May 2022. Work has not started for the hotel building and there are pre-commencement conditions and planning obligations that remain to be discharged before these works can lawfully commence.
16. Since the 2020 permission was granted, the intended hotel operator has changed (from Ruby Hotels to Motel One) which has led to a revised detailed design of the hotel to suit Motel One's requirements. The main changes proposed in this application are summarised here:
  - 1) An increase in the number of hotel bedrooms from 169 to 222.
  - 2) Revisions to the internal layout, the footprint and massing of the hotel building.
  - 3) Changes to the external appearance from the revised massing, and additional windows.
  - 4) Changes to the ground floor layout of the hotel entrance, lobby and reception.
  - 5) Increase in the size of the flexible affordable workspace and community use unit.
  - 6) Amendments to the layout around the new public courtyard.
  - 7) Revised energy strategy.
17. These proposed revisions will be each be described in more detail.
18. 1) An increase in number of hotel bedrooms from 169 to 222 (adding 53 bedrooms) is sought, which is achieved mainly by revising the internal layout of each floor of the approved hotel building, but also with increases in the footprint and massing of the building. A typical floor of the approved scheme would have provided 23 hotel bedrooms; this would increase to 29 bedrooms on a typical

floor of the proposed scheme. The number of bedrooms on the ground floor would increase from 11 to 23. The external changes are described below alongside floorplan diagrams.

19. 2) Changes are proposed to the footprint and massing of the approved hotel building. While the overall width of the hotel building remains the same (at 48m) and depth remains the same (14.5m), the irregular shape of the approved floorplan of the first floor upwards would be squared off. In floorplan terms these are circled in the images below and include;
- infilling a nook on the north-eastern side (circled in the top left of the image);
  - for the northern end to extend 1m closer to the rear of the office building (circled bottom left in the image);
  - to change the lightwell created where the hotel building touches the office building (ringed in the centre of the image); and
  - to infill the south-eastern corner (shown on the right of the image) from first to sixth floor levels. This infill measures 2.8m wide by 6.0m deep, and 18.2m high above the ground floor roof.

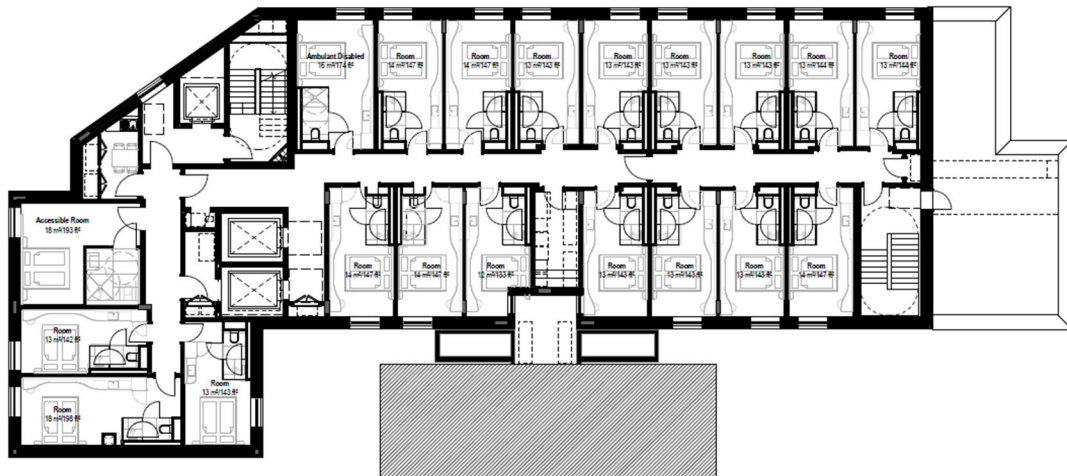


*A typical floorplan of the approved scheme*

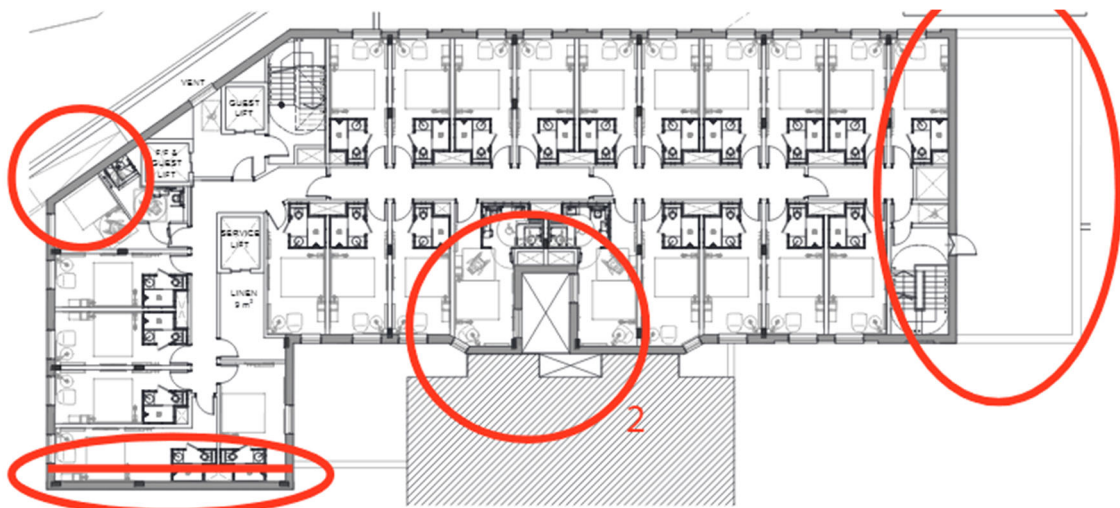


*Proposed floorplan with the changes circled*

20. On the seventh floor the southern end of the building would extend 60cm further, as shown by the right-hand circle below.



*Approved seventh floor plan*



*Proposed seventh floor plan*

21. 3) The proposed changes to the floorplans described above have associated changes to the external appearance from the revised massing, particularly to square off the south-eastern corner of the first to sixth floor, and because the increased number of bedrooms requires more windows around the building. The roof plant enclosure would extend on the north-eastern side to follow the revised floorplan above. The maximum height of the building at 28.1m does not change from the approved scheme.
22. The visuals below of the approved and proposed schemes indicate the changes as seen from the rear of the site within the adjoining school grounds (which are not publicly accessible) and from the Blackfriars Road frontage at the junction with Webber Street.





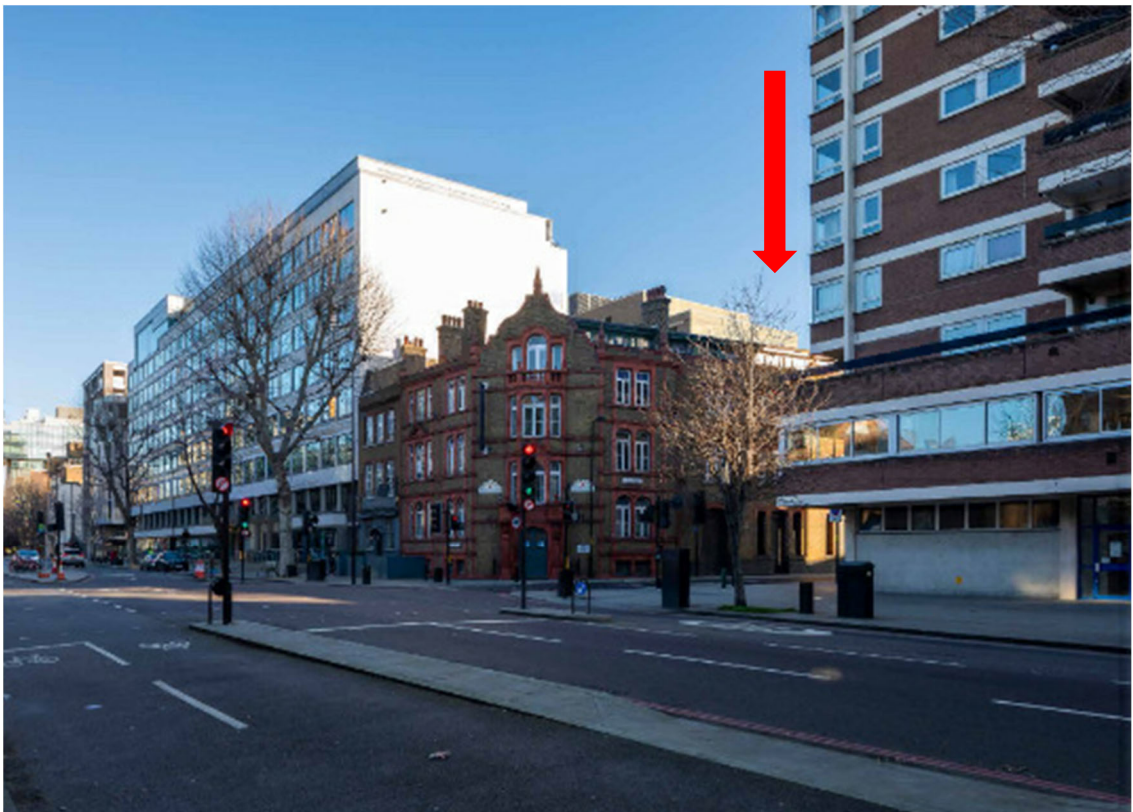
*Approved scheme as viewed from within the adjoining school's grounds*



*Proposed scheme viewed from the same school location, showing the additional width of the eastern façade (at the left-hand end), additional windows and enlarged roof plant*



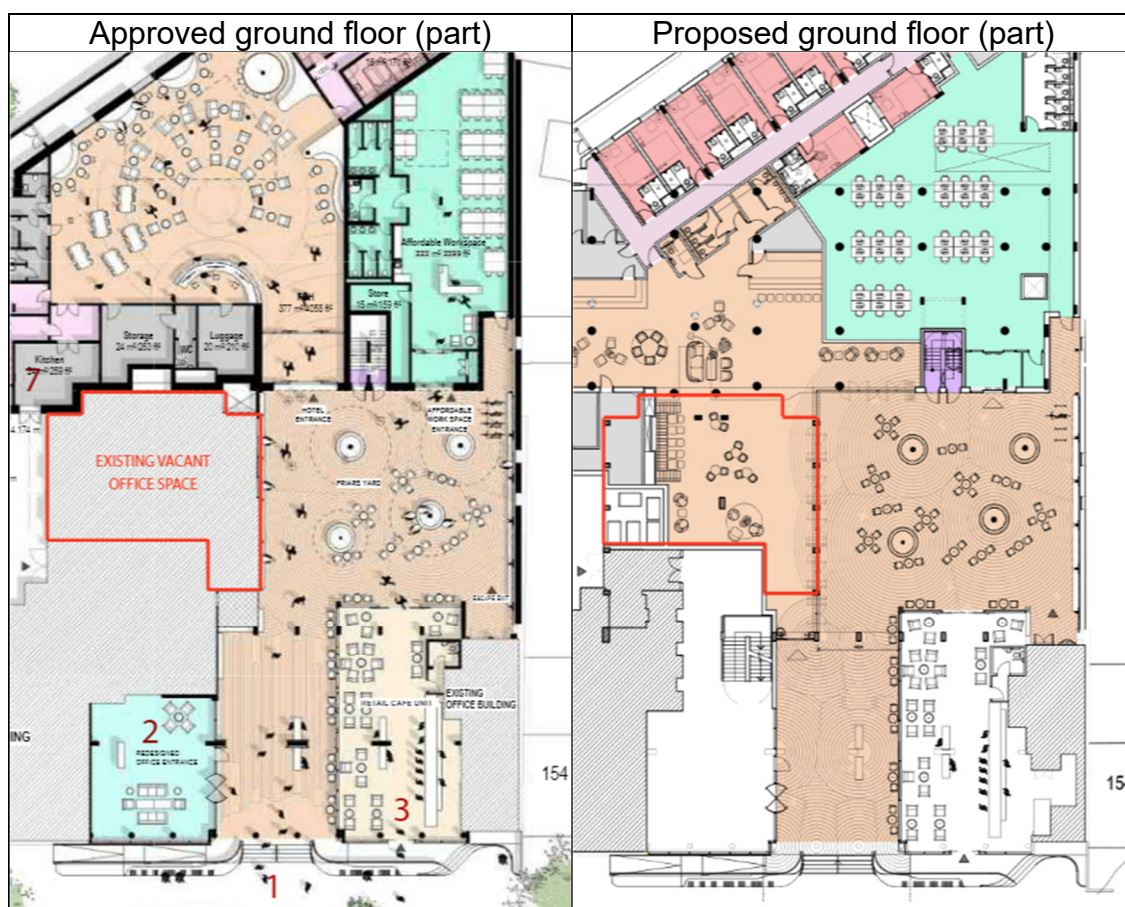
*Approved scheme viewed from the southern side of the Blackfriars Road/Webber Street junction*



*Proposed scheme viewed from the same location, showing the greater massing above the roof of Blackfriars Foundry (on the right-hand side)*



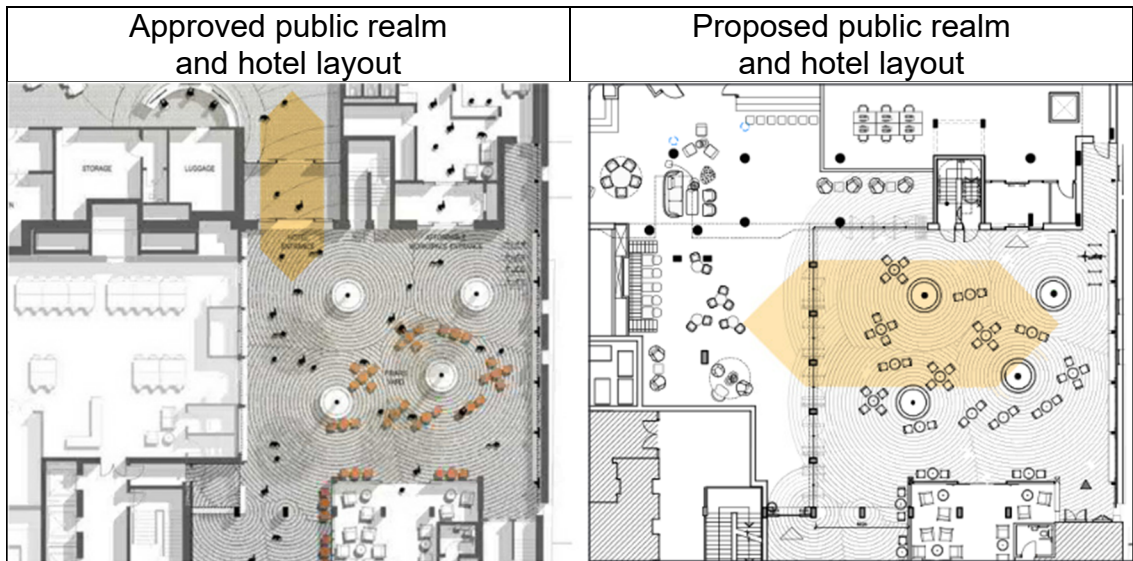
23. 4) The proposed revisions to the ground floor layout would revise the hotel entrance, lobby and reception, and provide more active frontage to the public courtyard.
24. Part of the ground floor of the existing office building (135sqm) would be incorporated within the hotel reception, as indicated by the red line in the drawings below, and which requires a small change to the application site boundary to include this area. It would allow the hotel's front door to move closer to the street frontage, and the hotel reception area would open onto two sides of the public courtyard created behind the existing office building. Some of the proposed additional hotel bedrooms would be located on the ground floor, so that the hotel reception area and back of house facilities are reshaped. The existing offices again would have a reception area at the street frontage.



25. 5) As part of the ground floor changes, the flexible affordable workspace or community use unit would increase in size from the approved 223sqm to 319sqm (an increase of 96sqm). This is shown in the top right of the each of the two diagrams above, in its approved and proposed sizes.
26. In the approved scheme this unit was approved as a flexible use to be either Class B1 or Class D1 use, and the s106 agreement requires it to be affordable workspace if used as Class B1 with a preferred tenant Artists' Studio Company (ASC). As part of the current application, the flexible use of this unit would remain and the applicant would like to list Affordable Workspace Partnership (AWP) as

an eligible tenant. AWP is a subsidiary company of ASC, and deliver bespoke and affordable designer-maker workstations for fashion designers, textile designers, furniture designers, product designers and illustrators.

27. 6) The approved scheme included a new public courtyard at the rear of the existing building, which provided access to the hotel and flexible use unit. In the current scheme, the size and shape of the courtyard remains as approved (430sqm). The revised layout means the hotel reception would look onto two sides of the courtyard, and the reception's retractable façades can be opened up in good weather. Instead of a planted green wall on the northern side, first floor level planters are now proposed.



28. The CGI visuals of the approved and proposed scheme can be compared.





*Approved scheme's courtyard, hotel entrance and green wall*



*Proposed scheme's courtyard, planting and openable façades*

29. 7) An energy strategy is proposed for this scheme, which was revised during the application. The approved scheme is required by a planning obligation to accord with its approved energy strategy. This s73 application has provided a new energy strategy that takes account of the proposed amendments to the hotel building. The revisions result in a 62.4% reduction on Part L 2013. However due to the increased number of hotel bedrooms, the modelled hot water demand for the proposal is higher than it was for the approved scheme, so that the overall carbon emissions from the regulated load is higher and the percentage reduction is not as good as the approved scheme. Due to the high hot water loads, the scheme does not achieve a 15% carbon reduction target from “be lean” measures.
30. As well as these 7 main amendments being sought, there are other smaller changes to the approved scheme being proposed, such as:
  - The hotel basement has a smaller footprint at its northern end and again would provide plant, switching rooms, staff rooms and changing rooms.
  - The existing basement of the office building would again provide two blue badge car parking spaces for the hotel. The approved car lift would no longer be proposed and instead the existing car park ramp used.
  - With the changes to the ground floor internal layout of the single storey part of the hotel building, smaller rooflights are proposed which allow a larger area of green roof planting.
31. The changes to the floor areas of the scheme would be amended as follows:

	Approved Scheme (20/AP/0556)		Proposed Scheme	
	GEA (sqm)	GIA (sqm)	GEA (sqm)	GIA (sqm)
Class C1 (Hotel)	6,614	5,956.1	6,906	6,400
Class E (Office Use)	330.1	311	469	434
Class E (Flexible Retail Use)	171.1	154.9	171	155
<b>Total</b>	<b>7,115.2</b>	<b>6422</b>	<b>7,546</b>	<b>6,989</b>

### Amendments during the application

32. An amended energy strategy was received for this application which improved the carbon savings from 59.3% to 62.4%, and increased the area of PV panels from 100sqm to 170sqm.
33. Revised drawings were provided to clarify:
  - The roof plan was amended to show the roof plant enclosure at the same southern extent as the approved enclosure, rather than the originally proposed increase of 1.3m.
  - Further information about the cycle parking and planters provided, and more staff cycle parking included.

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

34. 8 objections were received raising issues mainly regarding: the hotel use; there being no need for a hotel; the proposed increase in the number of rooms bringing greater numbers of visitors, movement and vehicles; how the site would be better used for other uses; the harm to neighbour amenity from loss of daylight, outlook and disturbance; and the increased size of the proposed building with it being out of character for the area. One comment in support was received. There were no objections from internal and statutory consultees. A more detailed summary of the consultation responses is set out in the later section from Paragraph 182.

### **Planning history of the site, and adjoining or nearby sites**

35. The relevant planning history of the application site is set out in Appendix 3. The most relevant decision is 20/AP/0556 which was approved by the July 2020 Planning Committee. The permission was for:

*Erection of an eight storey building with basement, comprising a hotel (Class C1), flexible commercial or community unit (Class B1/D1), retail floorspace (Class A1/A3), creation of public space, landscaping and associated works. Works to the existing office building at ground and roof levels (including a new rooftop terrace, balustrades and PV panels); elevational alterations; and alterations associated with the creation of a new entrance on the Blackfriars Road elevation.*

36. There was an earlier hotel scheme proposed in application ref. 18/AP/1215 which was refused by the October 2018 Planning Committee for six reasons relating to: 1) the absence of a completed s106 agreement; 2) an over-dominance of visitor accommodation in the locality; 3) a hotel being contrary to the uses required by site allocation NSP15 of the draft Southwark Plan; 4) the unacceptable impact on the amenity of adjoining occupiers due to loss of daylight and sunlight, and overshadowing; 5) the hotel would include poor quality visitor accommodation as there were bedrooms with no access to natural light and ventilation; and 6) adverse impact on townscape due to excessive height relative to the existing Blackfriars Road frontage, the tall building not being at a point of landmark significance nor a focal point. The description for that refused application was:

*Erection of a 10 storey building (40.23m AOD) with basement, comprising a 220 bedroom hotel with ancillary restaurant (Class C1); flexible office space (Class B1); retail units (Class A1/A3); creation of public space; landscaping and associated works. Works to the existing building at ground and roof levels (including a new rooftop terrace, enclosure and PV panels); elevational alteration; creation of a new entrance and the installation of an architectural feature along the Blackfriars Road elevation.*

37. The refusal was appealed and dismissed by the Planning Inspectorate. Of the council's six reasons for refusal, the Inspector dismissed the appeal only due to the harm the proposal tall building would cause to the character and appearance of the area and harm to the setting of Blackfriars Foundry. Following that appeal decision a revised, lower proposal (no longer a tall building at 8-storeys) was submitted in application ref. 20/AP/0556, which was approved after the July 2020 Planning Committee.
38. The planning history of the site includes recent condition details that have been approved to allow the street frontage works of the 2020 permission to start. A separate planning application for changes to the elevations of the office building was approved in February 2023 (ref. 22/AP/3402) for:

*Alterations to the facades of the office building with removal of the cladding, introduction of a fire escape door at roof level and upgrading the existing plant equipment (including addition of louvres).*

39. Advertisement consent has been recently granted in December 2022 (ref. 22/AP/3704) for:

*Installation of 6 no. illuminated fascia signs on the canopy along Blackfriars Road.*

40. An application proposing the installation of two pergolas to the roof of the existing office building was recently submitted in February 2023, ref. 23/AP/0381, which is not yet valid and will be assessed on its own merits.

## KEY ISSUES FOR CONSIDERATION

### Summary of main issues

41. 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.
42. The main issues to be considered in respect of the application are those set out in the report for the 2020 application listed below. However as a minor material amendment application to an implemented permission, 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.
43. The issues to be assessed focus on those raised by the proposed changes:
  - Principle of the proposed development in terms of land uses;
  - Environmental impact assessment;
  - Design and heritage;
  - Quality of accommodation;
  - Impact on the amenities of occupiers of adjoining properties;
  - Impact of adjoining and nearby uses on occupiers and users of the proposed development;
  - Archaeology;
  - Sustainable development implications;
  - Trees, landscaping and ecology;
  - Transport and highways issues;
  - Planning obligations and Community Infrastructure Levy (CIL);
  - Other matters;
  - Community involvement and engagement;
  - Community impact, equalities assessment and human rights.
44. These matters are set out in detail in the 'Assessment' section of this report.

### Legal context

45. 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) and the Southwark Plan (2022). Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) 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.

46. 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**

47. The statutory development plans for the borough comprise the London Plan (2021) and the Southwark Plan (2022). The National Planning Policy Framework (2021) 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 2. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.
48. The site is located within the:
- Central Activities Zone (CAZ)
  - Air Quality Management Area (AQMA).
  - Bankside, Borough and London Bridge Opportunity Area
  - Bankside and Borough district town centre
  - South Bank Strategic Cultural Quarter
  - Flood zone 3.

## **ASSESSMENT**

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

#### Relevant policy designations and appeal decision

49. The site is within the Central Activities Zone (CAZ), the Bankside, Borough and London Bridge Opportunity Area and the Bankside and Borough district town centre.
50. The relevant London Plan (2021) policies include GG2 'Making the best use of land' and SD1 'Opportunity Areas' which seek to enable the development of brownfield land particularly in Opportunity Areas to realise their growth and regeneration potential, and support development which creates employment opportunities. Policy SD4 'The CAZ' in part B acknowledges the nationally and internationally significant office function of the CAZ which should be supported and enhanced. Part E of policy SD4 acknowledges the unique concentration of cultural, arts, entertainment and tourist functions that should be promoted and

enhanced (with the supporting text noting that tourism facilities including hotels are strategic functions of the CAZ), and in part F the policy supports its retail functions. Similarly policy SD6 'Town centres and high streets' suggests commercial activities and hotels in town centre locations should be enhanced and promoted. Policy SD7 'Town centres: development principles and DPDs' sets out the town centre first approach for main town centre uses.

51. The Southwark Plan (2022) policies relevant to the proposed land uses are summarised as follows:
  - P30 Office and business development – in the CAZ, Opportunity Areas and town centres requires the retention or increase in the amount of employment floorspace in Class B uses.
  - P31 Affordable workspace – supports and requires the provision of affordable workspace on schemes proposing 500sqm GIA or more of employment floorspace.
  - P35 Town and local centres – ensures main town centre uses are located in town and local centres, are of a scale and nature that is appropriate to the role and catchment of the centre, and retains retail use or replace with an alternative use that provides a service to the public.
  - P41 Hotels and other visitor accommodation – requires the design, scale, function, parking and servicing arrangements to respond positively to local character and protect amenity of the local community and hotel visitors, and to provide at least 10% of the total floorspace as ancillary facilities.
  - P47 Community uses – supports new facilities that are accessible for all members of the community.
52. The site is within the Blackfriars Road Area Vision AV.04, which includes reference to development providing “new employment floorspace to meet a range of commercial needs including new offices and workspaces, hotels and shops”.
53. The application site forms the majority of allocated site “NSP17 Friars House 157-168 Blackfriars Road” which also includes some of the adjoining Webber Street properties to the south. The allocation requirements are framed to assume a full redevelopment of Friars House. It includes a requirement for redevelopment to:
  - provide at least the amount of employment floorspace (B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and
  - provide active frontages with ground floor retail, community or leisure uses on Blackfriars Road.
54. It also states that redevelopment of the site “should provide new homes” (but gives an indicative residential capacity of 0 homes), and acknowledges that the hotel permission ref. 20/AP/0556 is relevant to the site.
55. Turning to the relevant appeal decision on this site for the 2018 hotel proposal, that scheme was refused for six reasons, including two that related to the hotel use:

Reason for refusal 2) *"The proposed development would lead to an over dominance of visitor accommodation in the locality which would detract from the vitality of the area and harm the local character, and would reduce the potential for other services and uses to be provided for the benefit of residents and visitors. As such the proposal would be contrary to saved policy 1.12 – Hotels and Visitor Accommodation of the saved Southwark Plan (2007) and policy SP10 'Jobs and businesses' of the Core Strategy 2011".*

Reason for refusal 3) *"The development of a hotel would be contrary to the requirements of site allocation NSP15 of the draft submission version of the New Southwark Plan 2017 which does not list hotels as a required or accepted use. Development of the site for a hotel would remove the potential of the site to deliver new homes, for which there is an acute need in the borough, and which are an acceptable use under the draft site allocation. As such, the development fails to comply with the site allocation within the draft submission New Southwark Plan".*

56. These reasons were not upheld by the Inspector in the appeal decision. For reason 2, the Inspector concluded that *"a single additional hotel on the appeal site would not tip the balance for the nearby area such as to amount to a significant change in character for this locality. Both on its own, and in combination with other existing and permitted developments, the addition of one further hotel on the appeal site would not unduly compromise the balance of local land uses."*
57. In terms of the draft site allocation reason 3, the Inspector stated that: *"There is no scheme to demonstrate that the car park alone could be suitable for any significant amount of housing development and the owners have expressly ruled out redevelopment for housing. The existing office has been recently refurbished, and is unlikely to be redeveloped soon, so there is very little prospect of housing development on the site in the foreseeable future. While there could be conflict with the allocation in emerging policy NSP15 of the draft submission version of the New Southwark Plan 2017, which stipulates that development proposals for the wider site should include housing, as this is unlikely to happen, even over a 15 year timespan, and as the policy is far from adoption, this conflict should be given limited weight."*
58. When assessing the 2020 application for a hotel, the recent appeal decision was taken into consideration by officers and the Planning Committee when recommending and granting permission for a hotel-led development on this site, with no proposed housing.

### Hotel

59. The 2020 permission is extant and once the relevant pre-commencement conditions have all been discharged can be implemented for the hotel at the rear of the site. The proposed changes in the current application have mainly come about due to a change in the intended hotel operator for this site. The planning system cannot control the particular operator who runs a hotel, and the 2020

permission was not restricted to a particular company. The currently proposed operator is Motel One, who describe themselves as “*a design driven, affordable luxury brand*” and “*an international hotel brand with a strong European presence...pride themselves on outstanding quality, design and price propositions. High quality buildings and interior design are central to their brand.*”

60. Since the 2020 permission was granted, the development plan policies have changed with the adoption of the London Plan in 2021 and Southwark Plan in 2022. These new development plan policies nevertheless still given support for hotels. As set out above, policies SD4 ‘The CAZ’ and SD6 ‘Town Centres’ of the London Plan support the provision of tourist facilities within the CAZ as one of its strategic functions, and within town centre locations, as this application site is located within. The proposal accords with these London Plan policies, adopted since the 2020 permission.
61. The current scheme has to be considered against the new Southwark Plan policy relating to hotels, but acknowledged that the 2020 permission was granted and has been implemented so that the principle of a hotel on this site is not being revisited. Policy P41 “Hotels and other visitor accommodation” of the Southwark Plan is worded as follows:

*“1. Development for hotels and forms of visitor accommodation must ensure the design, scale, function, parking and servicing arrangements respond positively to local character and protect the amenity of the local community and visitors to the hotel.*

*2. A minimum of 10% of the total floorspace must be provided as ancillary facilities in hotel developments that incorporate a range of publicly accessible daytime uses and offer employment opportunities.*

#### *Reasons*

*Southwark welcomes new hotels new hotels, particularly those which contribute to employment growth and offer employment opportunities for local people. We have delivered one of the highest numbers of hotel rooms in London to meet London’s visitor accommodation needs and demand for hotels continues to grow in central London. Proposals that also incorporate a range of day time activities which provide additional employment floorspace will be considered favourably as they provide additional employment and encourage more use of buildings by residents, workers and visitors. Such uses may include hotel receptions, café and restaurants, conference facilities and meeting rooms, salons and other ancillary supporting space that can be made available for use by the local community as well as visitors staying at the hotel.”*

62. In terms of the aspects listed in part 1 of policy P41, the assessment of the design, parking and servicing arrangements for the proposed revisions are set on in detail later on in the report, but are each found to be acceptable. The scale and function of the proposed hotel building would remain similar to that of the approved scheme. A similar massing of hotel building and similar ground floor layout and access arrangements are proposed, although the number of hotel rooms within the new building has increased from the approved 169 bedrooms to 222, and so would intensify the hotel use of the site.



63. The 222 bedrooms in the current scheme are more than the 220 bedrooms of the appeal scheme. However the appeal decision found the addition of a hotel on the site acceptable and that it was in a different character area to the concentration of accommodation towards the river and around Waterloo station, without comment that 220 bedrooms would be too intensive for this site. The approved scheme had fewer bedrooms because of the lower building height, rather than any policy limit on the number of hotel rooms.
64. There is no planning policy that sets targets or caps on the number of hotel rooms for the borough or this part of the borough, and so the increase in bedroom numbers by itself is not a change resisted by policy. The impacts of the additional hotel rooms and the consequences from the design changes are considered in the later topics of this assessment section. There is no planning policy that sets room sizes, nor suggests an acceptable density of hotel rooms. As set out in a later section the quality of the hotel accommodation is acceptable. The increased number of hotel rooms would result in more trips by pedestrians, public transport and vehicles, and likely result in more servicing trips; these transport impacts are considered later in this assessment and found to be acceptable with mitigation measures in place. The impact on neighbour amenity is also considered below and found to be acceptable.
65. To conclude on part 1) of Southwark Plan policy P41, the principle of the hotel use has been established by the 2020 permission, and the addition of more hotel bedrooms to the approved scheme in a revised design is considered to not cause harm to the local character, nor to harm the amenity of the local community and visitors to the hotel.
66. In terms of part 2) of policy P41, the approved scheme provided a hotel reception area of 350sqm, which was 5.3% of the total floorspace of the hotel. The current scheme proposes a hotel reception area of 382sqm, which represents 5.5% of the current hotel proposal, and would include a bar for guests, visitors and the community, areas with seating and tables which open out onto the public courtyard, wifi, and ancillary toilet facilities. These facilities within the reception would be publicly accessible and support jobs within the hotel. While the 5.5% provision does not achieve the minimum 10% of the total floorspace required by policy P41 part 2), it is of a similar and slightly larger proportion as the approved scheme. As noted in the report for the 2020 application, the proposal continues to also include a separate affordable workspace and community unit, public realm and replacement retail unit that add further activity to a site with a variety of uses. This proposal as revisions to an extant permission is considered to have given sufficient regard to the requirement of policy P41.

### Office use and the flexible unit

67. The current proposal takes in more of the ground floor of the existing office building than was included in the approved scheme. This would remove 135sqm of existing office space at the rear of the building, to incorporate it into the hotel reception.

68. This loss of office space in the current application would be balanced by the flexible affordable workspace and community unit being created as part of the approved scheme and further expanded by the current proposal to 319sqm. While this unit has a flexible use, its increased size is considered sufficient to prevent a net loss of office floorspace across the site. The existing office would have a new office reception on the northern side of the central entrance, to improve the quality of its reception.
69. The increased size of the flexible affordable workspace and community unit is a benefit of the current proposal. It would be in the same part of the site, accessed from the public courtyard, and its enlarged floorplan served by rooflights. The applicant has been in discussions with the preferred tenant of this unit, and a subsidiary, about the revised design. The preferred tenant was included in the 2020 s106 agreement as Artists' Studio Company (ASC), and a subsidiary of ASC called Affordable Workspace Partnership (AWP) may take on the unit. AWP provide affordable designer-maker workstations for start-up fashion designers, textile designers, furniture designs, illustrators and product designers, and the enlarged unit could provide 40 workstations. The unit may also hold regular public exhibitions, and provide desk space for Living Bankside community group. The applicant would like to change the definition of "eligible tenants" to reference AWP. This change is agreeable to the local economy team, and would be included in the deed of variation. The unit would be offered at the same affordable rental and fit out terms as set out in the 2020 s106 agreement.

### Retail and the introduction of Class E

70. The size and location of the shop unit in the frontage building remains as the approved scheme. To ensure the replacement retail unit at the base of the existing building remains as a shop within the broad range of Class E uses, and to comply with policy P35 part 2), a condition is proposed to ensure this Class E use is restricted to retail, as Class E(a), (b) or (c).

### **Environmental impact assessment**

71. The scale of the revised proposal does not reach the minimum threshold of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) to trigger the need for an EIA. The proposal's location and its nature remain the same as the earlier application, and do not give rise to significant environmental impacts in this urban setting sufficient to warrant an EIA. This is the same conclusion as reached for the 2018 application and the 2020 application for similar scales of hotel development on the same site.

### **Design and heritage**

72. The NPPF emphasises the importance of good design and states in paragraph 126 that: "*Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development to communities.*" Policies within chapter 3 of the London Plan require a design-led approach to site capacity, good and inclusive design, and achievement of the

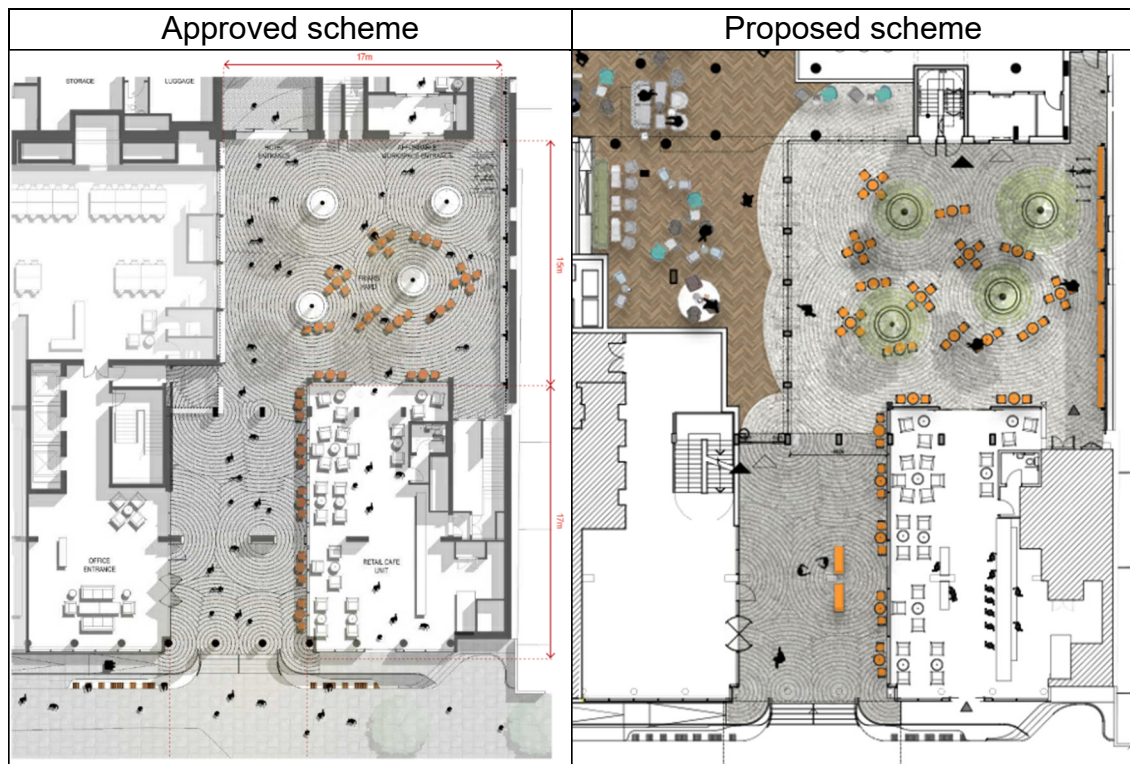
high standards of fire safety. In the Southwark Plan, policies P13 sets out the principles of urban design, P14 details the design quality considerations, P19 seeks to conserve or enhance the setting of listed buildings and P20 seeks to conserve or enhance the setting of conservation areas.

### Site context

73. This section of Blackfriars Road contains a variety of building heights and uses, as well as a mix of modern and heritage buildings. The site is to the south of, and separate from, the established tall buildings cluster at the northern end of Blackfriars Road. Globe View House to the north of the site is a 10-storey residential building, Manna Ash House to the north-east is an 8-storey student housing scheme with offices, and the single storey school to the east. Buildings on Rushworth Street further to the east include recently completed 6- and 8-storey schemes, while the Webber Street properties as a mix of offices and residential are generally 3- to 5-storeys high.

### Site layout

74. The site layout remains broadly in line with the approved scheme with the new hotel building sitting behind the retained frontage building and enclosing the eastern side of the new public courtyard (the same size and shape). The access to the proposed hotel by pedestrians (visitors and staff) remains as the approved scheme, in the centre of the Blackfriars Road frontage, although the front door of the hotel has been moved closer to the frontage. Servicing would again be carried out in the rear car park, access from the Pocock Street gate.
75. The proposed changes to bring the hotel front door closer to the pavement, making it more prominent and extending the hotel reception alongside the courtyard. The northern side of the courtyard (which is the left-hand side of each diagram below) would include more glazing, and a retractable façade that allows the hotel to open out onto the courtyard. This would give a more active façade than in the approved scheme, allow for more activation of the courtyard and natural surveillance.



### Height, scale and massing

76. The 2020 permission granted a large extension building that was subservient to the larger frontage office building and would read as part of a coherent and enlarged whole. The reduced scale of the 2020 building from the appeal tall building scheme was such that the upper parts of the building would only just be visible above the Foundry when viewed from Blackfriars Road and the western part of Webber Street, at a much reduced height and massing than the refused scheme. The approved scheme was considered not to dominate nor take away from the presence of this heritage building in the way that the previous appealed proposal did.
77. The top floor roof height of the 8-storey proposal remains the same as the approved scheme. As can be seen on the comparison images below, the proposed amendments would slightly increase the visible massing of the hotel building above the eastern end of the roof of Blackfriars Foundry, more than that of the 8-storey approved scheme. However the height of this additional massing is comparable with the approved scheme, albeit wider. The scale and appearance of this additional massing is considered to preserve the setting of the Foundry.



*Comparison visuals of the approved and current schemes*

78. The wider massing of the proposal would be most obviously seen in views from the east of the site, i.e. within the school grounds. This is not a public view and the visuals show that the proposed changes do not significantly increase the scale and massing of the proposal.
79. The proposed amendments to increase the floorplans are considered not to significantly change the massing and bulk of the proposal from the approved scheme.

### Architectural design and materials

80. With the increased number of bedrooms and extended floorplan, more windows are proposed to each floor, for example the eastern elevation was approved with 11 windows to a typical floor and is now proposed to have 13, and the northern elevation was approved with 3 windows per typical floor and is now proposed to have 5. The proportion and style of the windows matches those of the approved scheme, continuing the architecture of the approved scheme, which is welcomed.
81. The proposed materials of the hotel building remain as they were in the approved scheme as brick façades, recessed windows, concrete lintels and decorative brickwork features. The conditions on the 2020 permission that relate to the materials for the hotel building and detailed drawings of particular details would be re-imposed on a new permission. For these reasons, the scale, architecture and materials of the proposal are considered acceptable and the quality of the detailing would be continued through to the completed development by the imposed conditions.

## Heritage

82. The approved 2020 scheme was considered to preserve the setting of heritage assets in the local area, being shielded in many views by the taller office block on the site and by neighbouring buildings. The same conclusion is reached on these proposed amendments.
83. The proposal would again not be visible in views from Valentine Place Conservation Area and Kings Bench Conservation Area.
84. The widening of the building by infilling the south-eastern corner would not be prominent in views from other heritage assets in the area. The revised proposal would not affect the ability to identify and appreciate the grade II listed buildings of Albury House and Clandon House (to the south-east), the Peabody Estate (to the south-west) nor the Former Sons of Temperance building (to the north).
85. In terms of non-designated heritage assets, the visibility of the (taller) appeal scheme over the top of the Blackfriars Foundry was the focus of much of the appeal consideration and decision. As set out earlier in the report, the proposed amendments would increase the visible massing of the hotel over the eastern end of the Foundry roof, however, the changes are considered to continue to preserve the setting of the Foundry.

## Designing out crime

86. The Met Police consultation response commented that there is nothing within the proposed amendments that would negatively impact upon the potential for crime and antisocial behaviour. The Secured by Design condition of the 2020 permission would be re-imposed on the new decision.

## Fire safety

87. One adopted policy area that is additional to when the 2020 application was considered is that of fire safety, and policies D12 and D5 of the London Plan in particular. The applicant has provided a fire safety statement, which in line with the policy requirement and draft London Plan Guidance is written by a suitably qualified assessor and sets out: the proposed building's construction; the means of escape (including one evacuation lift, and refuge spaces within the stair core); the features incorporated to reduce the risk to life; fire-fighting access from Blackfriars Road and rear servicing yard for people and vehicles to park next to the building; and how future changes to the design would be considered. An additional condition is proposed to require compliance with this submitted fire statement.

## **Quality of accommodation**

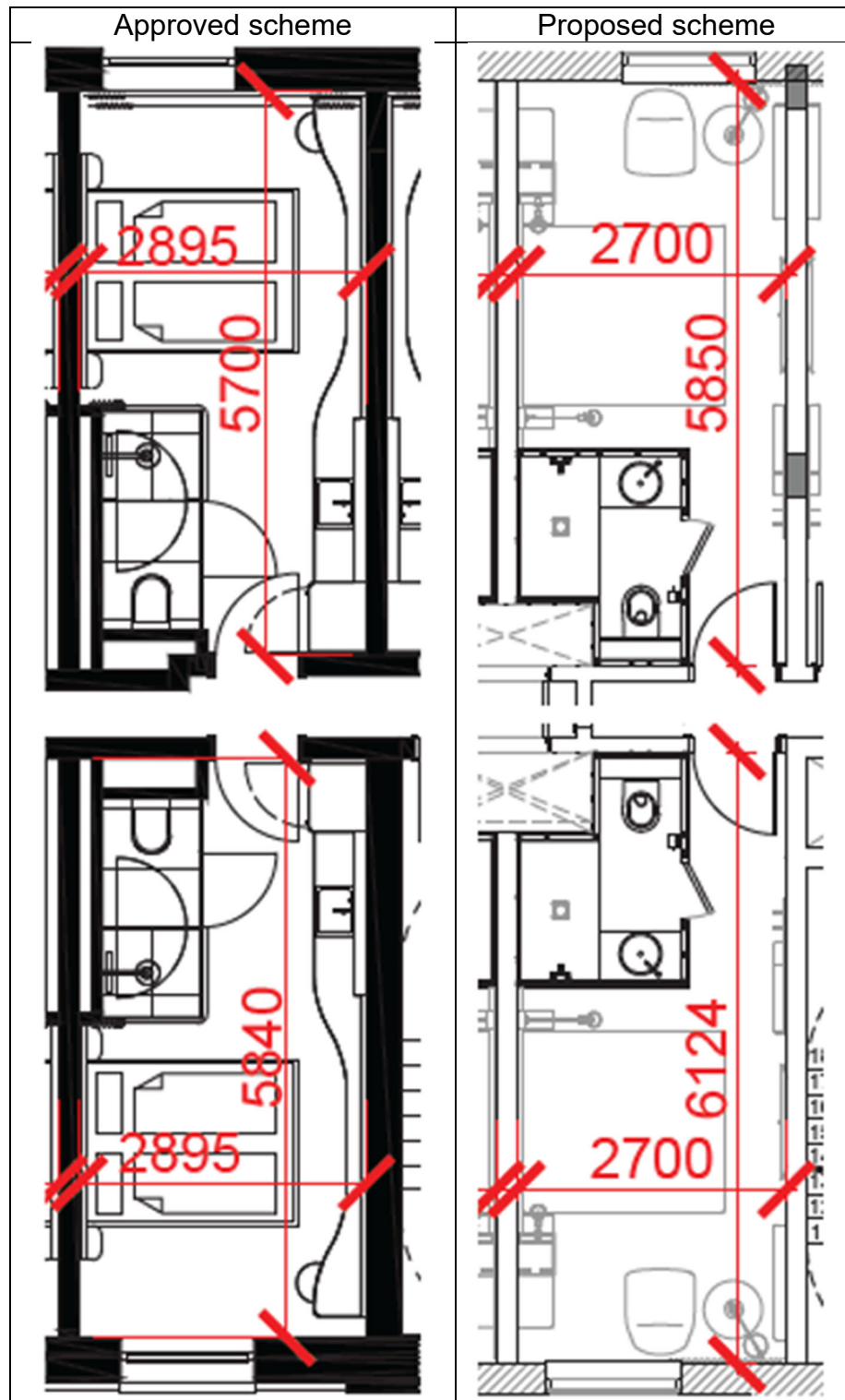
88. To remind the Planning Committee of how the quality of accommodation was considered in the previous applications, the 2018 application was refused for a

reason that related to the quality of accommodation as some 23% of the proposed hotel rooms had no window:

Reason for refusal 5) *“The proposed hotel would include poor quality and substandard visitor accommodation as a result of providing hotel rooms with no access to natural light and ventilation. As such the proposed development would be contrary to Policy 4.5 - London’s Visitor Infrastructure of the London Plan (2016) and the guidance contained within section C which seeks to improve the range and quality of visitor accommodation.”*

89. However, the appeal decision did not agree this was a reason to refuse planning permission stating *“the size and lack of windows alone should not be a bar to this development”* and so did not dismiss the appeal for this reason. In the approved 2020 scheme, two ground floor hotel bedrooms had rooflights to provide daylight and all other bedrooms had a window.
90. In the current scheme, a total of 11 rooms (4 ground floor rooms and 1 room per floor on first to seventh floors) each rely on a window to a lightwell to provide their only source of daylight and a limited outlook. These form 5% of the proposed hotel rooms, far fewer than the 23% of the appeal scheme which the Inspector found acceptable. All other rooms have a window to provide daylight and an outlook.
91. As with the approved scheme, some of these windows look onto the existing office building at a short distance and so would have a limited outlook. At the ground floor, the additional bedrooms and revised layout mean 15 windows would look onto the eastern boundary wall at a distance of 2m. Unlike the approved scheme, four bedrooms in the southerly end of the ground floor would have windows facing onto the Webber Street properties; these windows would need to be screened or obscure glazed to prevent views up to the residential properties that are only 9m away. This would increase the total number of bedrooms with limited outlook to 30, or 14% of the proposal. Details of how these southerly windows are to be treated would be required by an additional condition.
92. As the appeal decision did not support the council’s reason for refusal when there were more rooms without a window, the increased number of rooms relying on a lightwell or having limited outlook is not considered to be a reason for refusal.
93. This revised scheme would provide 22 accessible hotel rooms (10%) to accord with the relevant British Standard as required by London Plan policy E10 part H.1. All rooms would have accessible entrances and lift access.
94. The bedroom sizes in the proposed scheme are 15.8sqm to 16.5sqm, and so are slightly smaller than the approved scheme which had rooms between 16.5sqm to 16.9sqm. The hotel bedrooms are 15cm to 28cm shorter than the approved layouts, and 19cm narrower. All have an en-suite shower room. The diagrams below provide a comparison of two typical room layouts in each scheme.





95. There is a not a minimum hotel room size set in policy or guidance, and in view of the relatively small reduction in size compared with the approved scheme, the proposed layout is considered not to cause a material reduction in the quality of the visitor accommodation.



96. An acoustic report was submitted, which concludes that the design would achieve acceptable internal noise levels and vibration, including the likely impacts from the proposed mechanical plant.
97. In conclusion, the proposed amendments are considered to result in an acceptable standard of accommodation and amenity for visitors. The proposal would comply with this element within part 1) of policy P41 of the Southwark Plan and London Plan policy E10.
98. In terms of the other uses proposed on the site, the replacement retail unit at the base of the frontage building would retain the same layout as approved. The office reception would again be at the corner next to the central entrance, and while the massing of the hotel building would sit in front of the windows on the rear façade, the overall quality of the existing office building would remain good. The flexible use unit would be in the same location with front windows and rooflights to provide daylight. The quality of these aspects of the proposal are considered acceptable.

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

99. The 2018 hotel scheme was refused by the council because of the unacceptable impact on the amenity of adjoining occupiers due to loss of daylight and sunlight, and overshadowing. In the appeal decision, the Inspector commented that the nursery area of the adjacent primary school would be affected by a loss of daylight and a reduction in sunlight. The decision notes *"While these matters are not sufficient to outweigh the general benefits of a substantial development in a prime location, they nonetheless add slightly to the harm I have identified."* The appeal was not dismissed for neighbour amenity reasons. The approved 2020 scheme was for a lower building than the appeal scheme, reducing the scale of the proposal and the impacts to neighbouring properties to be acceptable. The 2020 permission was subject to conditions relating to noise and use of the terrace, in the interest of protecting neighbouring amenity.

### **Outlook and privacy**

100. The proposed amendments at the northern side of the hotel are considered not to cause a significant change to the outlook of Globe View House, due to the separation distance across Pocock Street. Nor is infilling the north-eastern corner and extending the roof plant alongside the student housing in Manna Ash House considered to adversely affect the outlook as while it is close to the boundary, it would be of similar massing as the approved scheme.
101. The infilling in the south-eastern corner of the hotel building would be set over 18m from the boundary with the school, and so would not adversely affect the outlook from the buildings nor the sense of enclosure in the playgrounds. More windows are proposed at the same separation distances as the approved scheme, and so would not reduce the privacy of the school.
102. This enlarged corner would be 18m from the rear of the nearest residential

building on Webber Street and would not adversely affect the residential outlook. As the additional window to this corner on each floor of the hotel sits at right angles to the rear windows of the Webber Street properties, it does not raise a privacy issue.

103. The new hotel room windows on the southern elevation at ground floor level would be only 9m from the rear windows of the Webber Street residential properties, and therefore it is considered necessary to require some form of screening or obscure glazing to protect neighbour privacy. The cycle store in this corner has been expanded and further details of this (as no elevations have been provided) to ensure it remains low on the shared boundary would be required by condition.
104. The enlarged south-eastern corner of the building would be closest to the windows in the commercial Blackfriars Foundry building. The flank wall would be continued at the approved 7.6m separation to allow outlook from the commercial neighbour, and again the proposal has no windows in the upper floors of its southern façade to prevent overlooking.
105. By extending the north-western part of the hotel building 1m closer to the rear façade of the existing offices on the site, the proposed building would be 9.8m from the office windows. No hotel windows are proposed to that flank. The proposed changes would not cause harm to the amenity of the existing offices.

### Daylight

106. The daylight testing of the current proposal uses the BRE's tests on the vertical sky component (VSC) to the centre of a window, and the no sky line (NSL) daylight distribution. While the BRE guidance was revised in 2022, these tests to existing neighbouring properties remain the relevant tests.
107. The reported passes and fails for the windows and rooms of surrounding residential properties in the 2020 scheme can be compared to the test results of the current proposal as set out in the tables below. NB, as more windows in Tadworth House were tested the total number of windows changes.

VSC impacts in approved 2020 scheme

	<b>Total windows tested</b>	<b>Windows that pass</b>	<b>Windows that fail</b>
Globe View House	110	102	8
The Bell	17	17	0
The Priory	27	27	0
Bridgehouse Court	36	36	0
The Crown	8	8	0
Tadworth House	91	88	3
Sharpley Court	12	12	0
<b>Total</b>	<b>301</b>	<b>290 (96.3%)</b>	<b>11 (3.7%)</b>

VSC impacts with the current proposal (changes underlined)

	<b>Total windows tested</b>	<b>Windows that pass</b>	<b>Windows that fail</b>
Globe View House	110	102	8
The Bell	17	17	0
The Priory	27	<u>25</u>	<u>2</u>
Bridgehouse Court	36	36	0
The Crown	8	8	0
Tadworth House	<u>102</u>	99	3
Sharpley Court	12	12	0
<b>Total</b>	<b><u>312</u></b>	<b><u>299 (95.8%)</u></b>	<b><u>13 (4.2%)</u></b>

NSL impacts in approved 2020 scheme

	<b>Total rooms tested</b>	<b>Rooms that pass</b>	<b>Room that fail</b>
Globe View House	56	47	9
The Bell	13	13	0
The Priory	15	15	0
Bridgehouse Court	12	12	0
The Crown	4	4	0
Tadworth House	44	44	0
Sharpley Court	12	6	6
<b>Total</b>	<b>156</b>	<b>141 (90.4%)</b>	<b>15 (9.6%)</b>

NSL impacts with the current proposal (changes underlined)

	<b>Total rooms tested</b>	<b>Rooms that pass</b>	<b>Room that fail</b>
Globe View House	56	<u>46</u>	<u>10</u>
The Bell	13	13	0
The Priory	15	15	0
Bridgehouse Court	12	12	0
The Crown	4	4	0
Tadworth House	44	44	0
Sharpley Court	12	6	6
<b>Total</b>	<b>156</b>	<b>140 (89.7%)</b>	<b>16 (10.3%)</b>

#### Globe View House

108. 8 windows fail the VSC test, the same number as in the 2020 scheme, with

reductions between 24.8-38.2% which are up to 2% greater than the impacts of the approved scheme. These windows have very low existing daylight levels of 2.2-4.84% VSC value due to their recessed location and a projecting balcony above. These windows would experience a slightly greater percentage loss of daylight with the proposed (up to a further 2% loss) than the approved scheme. The further daylight reduction on the low existing VSC values is unlikely to be noticeable to occupiers, nor significantly harm the amenity of these units.

109. For the NSL test one extra room now fails the daylight distribution test to give a total of 10 rooms, compared with the approved scheme where 9 rooms failed on the first, second and third floors. This additional room is a combined living kitchen dining room to a fourth floor flat, served by windows that are recessed behind a projecting balcony above; in the approved scheme would have experienced a 16.8% reduction and with the current scheme would have a 21.7% reduction, slightly above the 20% reduction suggested to be "noticeable". The room retains daylight to 70% of the room. The reduction in daylight distribution would not cause significant harm to the amenity of this flat.

#### The Bell

110. All of the 17 windows tested pass the VSC test and all 13 rooms pass the NSL test, so the proposal would not cause a significant reduction in daylight.

#### The Priory

111. Some windows and rooms would experience reduced daylight levels, and slightly greater reductions than the approved scheme. Two of the 27 windows fail the VSC test, which is two more failures than in the 2020 scheme. These two windows would retain good VSC values of 20.5 and 23.3% and so the quality of accommodation would not be significantly harmed. All the rooms pass the NSL test.

#### Bridgehouse Court

112. As with the approved scheme, the windows and rooms assessed would experience some reductions but all pass the VSC and NSL tests.

#### The Crown

113. As with the approved scheme, the tested windows and rooms all pass the VSC and NSL tests.

#### Tadworth House

114. In the approved scheme, three windows failed the VSC test. These three windows again fail as they have low existing VSC values (1.86-3.03%) being in a recessed balcony. This means that the reductions of less than 1% VSC represent a high percentage loss. These rooms pass the NSL test so when taken together the proposal would not have a significantly harmful impact.

#### Sharpley Court

115. All the tested windows on the second floor of Sharpley Court pass the VSC test, and therefore the windows on the higher floors would also pass. Six of the tested rooms would fail the NSL test, the same number as failed in the consented scheme, which is due to the deep rooms in the layout of these flats. The

percentage reductions to these six living/kitchen/dining rooms range from 24.8% to 37.2% in this proposed scheme, compared with the 20.8-34.5% of the approved scheme, due to the increased massing of the proposal.

116. The officer report on the 2020 scheme stated *“When considered with the compliant VSC levels to the windows, and noting that the Inspector did not dismiss the taller appeal scheme for this reason, the impact of the development on Sharpley Court’s daylight is considered not to be a justifiable reason for refusal of this scheme. It is noted below that it would retain good sunlight levels.”* Officers’ conclusion is the same in this revised scheme.
117. Two further properties were tested. A new residential development, Hambridge House on Webber Street has been completed since the 2020 scheme was approved. The flats within Hambridge House have not had detailed daylight tests undertaken as it passes the simple 25 degree test, and so would not experience a noticeable change in daylight.
118. Daylight tests were carried out for the adjacent Friars Primary School, which is the east of the site. Four windows (two windows in two rooms) of the 34 tested would experience a percentage reduction in VSC of 22-39%, however the other windows serving these two rooms would not experience a noticeable reduction in VSC, so that the rooms overall would retain an acceptable level of daylight. These VSC reductions are very similar to those that would occur with the approved scheme (which had VSC percentage reductions of 21.3-38.4%).
119. One of these school rooms would also fail the NSL test, (seeing a 26.3% reduction in daylight distribution) but retaining daylight to 73.8% of its area and so would retain good daylight levels. As was done for the 2020 application, the ADF test was repeated for six school rooms which shows the current proposal has a very similar impact as the approved scheme. The resulting ADFs from the proposed scheme would be: 2.72; 0.17; 2.71; 3.89; 4.33; and 4.40%. These compare with the approved scheme’s impacts that would be 2.76; 0.17; 2.72; 3.94; 4.40; and 4.41% and would not be a noticeable reduction in daylight to the school rooms.

### Sunlight

120. The submitted sunlight assessment of the proposal uses the same annual probable sunlight hours test as carried out for the 2020 scheme. The surrounding residential properties were tested for the sunlight hours to windows that face within 90 degrees of south. A window would fail the sunlight test where all three criteria are met:
  - The window would receive less than 25% of annual probable sunlight hours or 5% of winter hours; and
  - It would experience more than a 20% reduction in current hours and;
  - The absolute reduction in annual hours would be more than 4%.
121. When compared with the approved scheme, the results for the APSH are the same with all rooms passing. For the 2020 scheme, the approved development would have the following impacts:

	<b>Total rooms tested</b>	<b>Rooms that pass both annual and winter hours tests</b>	<b>Rooms that fail annual hours</b>	<b>Rooms that fail winter hours</b>
Globe View House	55	55	0	0
The Bell	-	-	-	-
The Priory	4	4	0	0
Bridgehouse Court	-	-	-	-
The Crown	4	4	0	0
Tadworth House	13	13	0	0
Sharpley Court	12	12	0	0
<b>Total</b>	<b>89</b>	<b>89 (100%)</b>	<b>0 (0%)</b>	<b>0 (0%)</b>

122. The current proposal would have the following impacts:

	<b>Total rooms tested</b>	<b>Rooms that pass both annual and winter hours tests</b>	<b>Rooms that fail annual hours</b>	<b>Rooms that fail winter hours</b>
Globe View House	56	56	0	0
The Bell	-	-	-	-
The Priory	4	4	0	0
Bridgehouse Court	-	-	-	-
The Crown	4	4	0	0
Tadworth House	14	14	0	0
Sharpley Court	12	12	0	0
<b>Total</b>	<b>90</b>	<b>90 (100%)</b>	<b>0 (0%)</b>	<b>0 (0%)</b>

123. While windows would experience a reduction in annual probable sunlight hours throughout the year and/or during the winter, these reductions are not sufficient to fail the APSH. The proposal would have an acceptable impact in sunlight terms to neighbouring residential properties.

124. The proposal would not cause a significant loss of sunlight to the Friars Primary School's windows.

### Overshadowing of amenity spaces

125. The shadowing impact of the proposal on 21 March (the spring equinox) has been undertaken for the neighbouring school's outside spaces, using the BRE guidance for the sun on ground test.
126. The results demonstrate that the school's main nursery space would continue to receive at least two hours of sunlight on 21 March, changing from the current 68% to 55%, as happened with the approved scheme. As at least half of this area retains two hours of sun on ground, this accords with the BRE criteria. The main playground on the eastern side of the school would continue to receive good sunlight levels too.
127. In the dismissed appeal, the Inspector noted that the loss of daylight and sunlight to the school were "*not sufficient to outweigh the general benefits of a substantial development in a prime location*". Officers consider that the daylight, sunlight and overshadowing impacts to the school from this revised scheme continue to be acceptable and would not materially harm the operation of the school nor the use and enjoyment of the spaces.

### Conclusion on daylight and sunlight

128. The impacts of the proposal are of a similar scale as the approved scheme. The proposal would have an acceptable impact on the daylight, sunlight and overshadowing of surrounding residential and school properties.

### Noise and vibration

129. The increased number of hotel rooms and larger size of the affordable workspace and community unit are likely to lead to more people (hotel guests, staff and visitors) coming into and leaving the site as pedestrians, cyclists or in vehicles each day. The increase in the number of comings and goings by more pedestrians and vehicles to this site in this central location, designated town centre and on a main road is not considered to cause significantly more noise and disturbance to cause harm to neighbour amenity.
130. The submitted acoustic report summarises the noise monitoring from August 2022, and considers that the noise levels from the proposed roof plant at the closest residential neighbours can achieve the council's criteria. Attenuators would be required to the air handling units and acoustic screens around the roof plant to mitigate the noise to an acceptable level. EPT reviewed this new report, and consider that the conditions on the 2020 permission would sufficiently address the impacts.
131. Therefore, as with the 2020 permission, conditions are recommended regarding plant noise (including testing results), the kitchen ventilation, noise from amplified music, hours of use of the roof terrace on the existing office building, no use of the flat roofs of the hotel, opening hours of the restaurant/café use, servicing hours and external lighting are all proposed in the interest of protecting neighbour

amenity from noise, odour and light pollution. A construction environment management plan was required by a planning obligation and would continue to be required for the hotel development.

### **Impact of adjoining and nearby uses on occupiers and users of the proposed development**

132. As with the approved scheme, it is not anticipated that there would be any conflict of neighbouring uses (office, retail, student housing, school and residential) that would adversely impact upon occupiers of the proposed hotel, retail, office or community spaces.

### **Archaeology**

133. The proposed amendments do not raise new or additional archaeology impacts. The conditions on the 2020 permission would be imposed on the new decision, updated to reflect the condition parts already discharged. The obligation for a payment for monitoring and advice (in line with the council's S106 and CIL SPD) secured in the 2020 s106 agreement would not be affected.

### **Sustainable development implications**

#### Construction management

134. The requirement for a construction management plan that was secured in the 2020 legal agreement would continue to apply to this revised development.

#### Water resources

135. Thames Water in the initial consultation response raised no objection in terms of waste water network capacity and requested a condition regarding water network capacity to serve the proposal. Following further communications between the applicant and Thames Water it has been clarified that there is water capacity to serve the proposal, and Thames Water removed the condition request. The comments from Thames Water on the approved scheme were included as an informative on the decision and would be copied over on a new permission.

#### Flood risk

136. The site is located in flood zone 3 which is defined as having a 'high probability' of river and sea flooding and accordingly the applicant has submitted a flood risk assessment. The hotel would have ground floor level hotel bedrooms, as the approved scheme did. A short statement of conformity on flood risk and drainage was provided, which concludes the scheme amendments result in no change in flood risk at the site, and that the flood risk assessment of the 2020 application remains valid. The Environment Agency was consulted on this application and did not raised any objection, subject to a condition regarding the finished floor level, as with the 2020 permission.



### Sustainable urban drainage

137. The submitted statement of conformity concludes that as the proposed scheme retains the massing and form of the approved development (with the changes being mainly internal to the building), the surface water drainage strategy of the 2020 application remains valid. The conditions on the 2020 permission relating to drainage, investigation work and basement impact assessment would be carried over to a new permission.

### Land contamination

138. The proposed changes would not affect the groundworks of the approved scheme. The same contamination condition would be re-imposed, and updated to reflect the parts of the condition that have been discharged.

### Air quality

139. The proposed changes do not raise material air quality issues, with the additional rooms leading to a small increase in vehicle movements. As with the approved scheme, the removal of most of the on-site car parking would assist in improving air pollution and electric vehicle charging points would again be required by a condition. Another condition regarding details of the ventilation of the hotel rooms (given the proximity to Blackfriars Road) would also be copied onto a new permission.

### Light pollution

140. The proposed changes do not raise light pollution issues. The condition from the permission requiring details of any external lighting would be included on a new permission.

### Whole life cycle and carbon capture

141. At the time of the assessment of the 2020 application, the whole life carbon aspect in the current London Plan policy SI2 “Minimising carbon emissions” part F was not a policy requirement, and no conditions in this regard were imposed. The limited changes to the scale of the building and to its fabric in the amendments proposed, when compared with the approved scheme, are considered not to warrant the imposition of conditions regarding whole life carbon.

### Carbon emission reduction

142. The approved scheme incorporated energy efficiency measures, air source heat pumps, PV panels and a range of “be lean” measures to give an overall carbon reduction of 67% on Part L 2013, which exceeded the minimum 35% on-site reduction required by the London Plan (2016). At that time, the London Plan’s

zero carbon requirements did not apply to non-residential buildings, so no carbon offset financial contribution was secured in the 2020 permission to address the 95.5 tonnes of remaining annual carbon emissions.

143. An energy strategy has been provided with this current application, and was revised during the assessment of the proposal to improve the proposed carbon savings. It sets out how a 62.4% reduction in carbon savings would be achieved for the revised scheme. Due to the increased number of hotel rooms leading to a higher hot water demand (and therefore the resulting carbon emissions), the modelling of the current scheme results in a larger baseline carbon emission for the regulated energy uses at 341 tonnes – compared with 293 tonnes of the approved scheme. While there is a proposed increase in number of rooms, the applicant states that the energy use per room is equal to that of the approved scheme. The applicant states that as the 2020 permission has been implemented, the scheme has been registered using the 2013 Building Regulations, rather than the 2021 Regulations, and the energy strategy uses the 2013 Regulations to provide a ready comparison with the approved scheme.

#### Be Lean (use less energy)

144. The proposal would include within its construction: thermal elements that achieve better u-values than required for Building Regulation compliance; higher performing glazing; low air permeability rates; efficient heating system; controlled ventilation with heat recovery; and energy efficient lighting. However despite these “be lean” measures, using the modelling method set by the GLA there would be no overall carbon savings compared with a modelled baseline scheme due to the hot water demand for the increased size of the hotel. The hot water demand in the modelling represents 82% of the overall regulated load, and so outweighs the “be lean” measures the scheme would incorporate.
145. The proposals fails to accord with London Plan policy SI2 “Minimising greenhouse gas emissions” in part C which states that “*non-residential development should achieve 15 per cent [reduction] through energy efficiency measures*”. The failure to comply with this part of the London Plan policy must be considered alongside the overall carbon reductions that significantly exceed the minimum 35% on-site reduction requirement of the London Plan and 40% of the Southwark Plan, and the payment of a carbon offset payment which together would achieve the net zero carbon requirement of the full policies.

#### Be Clean (supply energy efficiently)

146. The nearest heating network is approximately 800m from the site, and therefore no “be clean” savings are achieved. As with the approved scheme, the revised proposal includes a location which could be converted into a plant room for a future connection to a district heat network, should one become available.

#### Be Green (use low or carbon zero energy)

147. PV panels are proposed to the roof of the existing office building, and to the roof of the hotel building, as was included in the approved scheme. To help reduce

the increased carbon emissions of this revised scheme, a further 70sqm of PV panels have been incorporated, including PV panels on the roof of the ground level part of the hotel building. Air source heat pumps are proposed on the roof of the hotel within the plant enclosure. Together these renewable energies would reduce carbon emissions by 62.4%.

148. The remaining 37.6% of carbon emissions would need to be mitigated by payment of a carbon offset contribution to achieve the net zero carbon policy requirement. The remaining 128.5 tonnes per year would require a payment of £366,225 (indexed). This would be secured in the deed of variation as the 2020 permission was not required to achieve zero carbon. The legal agreement drafting would allow for a revised energy strategy to be submitted and approved, and the payment to be adjusted if the on-site carbon savings are improved.

### Be Seen (monitor and review)

149. The “be seen” requirements of the London Plan would be added as a new planning obligation to any new permission. These were not required in the 2020 permission and so would be a positive change for any new permission.

	Approved scheme	Proposed scheme
Baseline carbon emissions from regulated load	293 tonnes per year	341 tonnes per year
Total savings on-site	67%	62.4%
Remaining carbon emissions	95.5 tonnes per year	128.5 tonnes per year
Carbon offset payment	None	Yes - £366,225 (indexed)
Be Seen requirements	None	Yes

### Conclusion on carbon

150. The current proposal is for a scheme that has a higher baseline carbon emissions in the energy modelling than the 2020 approved scheme and its remaining carbon emissions after the be lean, be clean and be green energy measures are also larger. The reason for the increase is the larger number of additional bedrooms that this scheme is seeking, which result in higher hot water demands and mean there are no “be lean” savings. The proposal incorporates more PV panels than the approved scheme and, unlike the approved scheme, would pay a carbon offset contribution for its remaining carbon emissions and be required to undertake the “be seen” monitoring in order to address the requirements of current policy. Therefore officers consider the current proposal to sufficiently address current policy, subject to the revised planning obligations detailed later in this report.

### Circular economy

151. At the time of the 2020 application, the circular economy consideration was not an adopted policy requirement (as London Plan policy requirement of part B of policy SI7 Reducing waste and supporting the circular economy was not adopted

policy), and no conditions in this regard were imposed. The limited changes in the scale of the proposed building from the approved scheme, and as the materials of the hotel building remain those of the approved scheme, the current proposal is considered not to warrant the imposition of conditions.

### Overheating

152. Given the nature of the hotel layout, the masonry materials of the proposal and how the windows to the upper floors would allow natural ventilation, the overheating risk assessment for this non-residential scheme found that the risk of overheating to be low.

### BREEAM

153. The approved scheme includes a condition requiring an interim report on the BREEAM rating and a post-construction review within six months of occupation. This condition was based upon that discussed between the parties at the public inquiry, and did not clearly state which rating had to be achieved. Given Southwark Plan policy P69 Sustainability standards now requires an “excellent” BREEAM rating for non-residential development over 500sqm, an amended condition is proposed to make it clear that at least an “excellent” rating would need to be achieved for the hotel building.

### **Trees, landscaping and ecology**

154. The new public realm in the approved scheme (as the courtyard to the rear of the existing building) is retained at the same size and shape in this current proposal. It would contain the same number of new trees. By replacing the approved green wall along the northern side of the courtyard, with the openable façade of the hotel reception, planters are proposed above which would provide greening. The proposed amendments would not affect the street trees along Blackfriars Road.
155. The ground floor roof of the hotel building would provide 140sqm more green roof than the approved scheme, as the area of rooflights has been reduced from the approved scheme. This would be of benefit.
156. Overall, the proposal is considered to be of the same landscape quality, provide similar urban greening and biodiversity improvement to the site, which is currently car parking. The conditions on the planning permission regarding tree protection, landscaping, biodiverse roofs and nesting bricks would be copied over to a new permission, and updated where they have been partly discharged. The obligations within the 2020 s106 agreement regarding the provision of the public realm, its maintenance and public access at all times remain unchanged.

### **Transport and highways**

#### Site layout

157. The access in the centre of the Blackfriars Road frontage to the proposed hotel by pedestrians and cyclists remains as the approved scheme, with the current proposal moving the front door closer to the pavement. Servicing arrangement including refuse collection involving vehicles accessing this development's service yard from Pocock Street.

### Trip generation

158. Concerning the vehicle movements from the revised proposal, officers' interrogation of comparable sites' travel surveys within TRICS travel database has revealed that it would create additional 2 two-way vehicle movements in the morning or evening peak hours, a figure that matches that of the applicant's consultants. It is estimated that the added number of deliveries would be some 3 two-way vehicle movements (2 deliveries) per day. Officers consider that the level of vehicular trips would not have any noticeable adverse impact on the prevailing vehicular traffic on the adjoining roads. The applicant's consultants suggest that the two-way service vehicle trips per day for this entire development would be reduced from 10 to 4 (8 two-way vehicle movements) because of the modified servicing method relating to the new Motel One operator.
159. The projected two-way supplementary public transport trips for this development are 9 and 12 in the morning and evening peak hours respectively. This is considered not to materially impact upon public transport capacity in the area.
160. The 2020 section 106 agreement secured highway works to repave the footway and reconstruct the Pocock Street vehicle crossover. It also secured financial contributions to improve the pedestrian environment and encourage sustainable transport modes. These contributions included £40,000 for bus countdown facilities, £68,720 for pedestrian route improvements, £20,000 for an additional crossing on Blackfriars Road, and £67,000 towards cycle hire facilities. This package of mitigation is considered sufficient for the revised proposal.

### Servicing and deliveries

161. The requirements in the 2020 s106 agreement for a delivery and servicing plan and payment of a delivery and servicing cash deposit and monitoring fee would continue to apply. To reflect the increased floor area of the proposal and potential additional servicing and delivery vehicles to serve the larger hotel, an increased delivery and servicing cash deposit would be secured in the new legal agreement of £7,700 (indexed), compared with the £6,033 (indexed) secured in the 2020 s106 agreement.

### Refuse storage arrangements

162. There is no change to the refuse storage at the rear of the site in this revised scheme.

### Car parking

163. As with the approved scheme, two basement wheelchair car parking spaces would be available for the hotel. Instead of a car lift being installed as was approved in the 2020 permission, the applicant is proposing now to retain the existing basement ramp. No internal link was approved between the parking and the hotel. The same condition regarding the inclusive access to the basement, potentially with valet parking given the length of the car ramp, would be reimposed on any new permission.

### Cycle parking and cycling facilities

164. The application proposes 16 visitor cycle spaces provided by Sheffield stands within the courtyard, and 22 long stay spaces (including 2 cargo/disabled spaces) in a mix of two-tier racks and Sheffield stands in a covered cycle store building at the rear of the site for staff. This provision exceeds the minimum of 32 spaces required by the London Plan and Southwark Plan standards, and is 10 more than the approved scheme. Further details of this store would be required by condition given its proximity to the boundary.

### S106 obligations

165. The obligations in the 2020 legal agreement regarding: the s278 highway works; financial contributions towards bus countdown, pedestrian route improvements, an additional Blackfriars Road crossing and cycle hire facilities; a car parking management plan; a travel plan; a hotel management plan; a CEMP for the hotel building construction; no parking permits; a delivery and servicing plan and payment of the cash deposit, provision of the public realm, and completion of the entrance stairs/ramps would remain, and continue to apply to any new decision issued. The increased cash deposit amount of £7,700 (indexed) would be secured in a deed of variation to reflect the larger floor area of the proposal.
166. With the revised floorspace of the proposal, the delivery and servicing cash deposit would be increased to £7,700 (indexed) in a deed of variation.

### **Planning obligations and Community Infrastructure Levy**

167. Planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. The Section 106 Planning Obligations and CIL SPD sets out in detail the type of development that qualifies for planning obligations. 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.
168. 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 were replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

169. 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 2. Southwark's CIL will provide for infrastructure that supports growth in Southwark.
170. The site is located within Southwark CIL Zone 2, and MCIL2 Band 2 Zone. Based on the GIA data provided by the agent, the gross amount of CIL is approximately £1,908,988.59, consisting of £991,430.24 of Mayoral CIL and £917,558.35 of Borough CIL. It should be noted that this is an estimate, and the floor areas on the approved drawings will be checked when related CIL Assumption of Liability form is submitted, after planning approval has been obtained.
171. The 2020 permission was subject to a section 106 agreement that secured the following planning obligations to ensure the proposal complied with planning policies and securing necessary mitigation to minimise the adverse effects of the development:
- Archaeological monitoring – payment of a financial contribution of £6,778 (indexed).
  - Affordable workspace unit – to confirm to the council whether the ground floor unit is to be used as business space or a non-residential institution use. If the unit is used for Class B1 space, for it to be affordable workspace, with details of the specification of the workspace, marketing strategy, management plan, at least 30% discount on market rent levels for 30 years to be submitted for approval. Requiring a community use methodology and five years of reporting on the community use of the unit.
  - Car park management plan.
  - Construction management plan.
  - Delivery and servicing plan and payment of a delivery and servicing cash deposit and monitoring fee.
  - Employment during construction – 14 jobs for unemployed residents, 14 short course and 3 apprenticeships (and financial payment for any shortfall) and an employment, skills and business support plan.
  - Employment in the development – 11 sustained jobs and a payment for any shortfall.
  - Local procurement opportunities during construction and end use.
  - Energy strategy – to build in accordance with the energy strategy.
  - Hotel management plan – to detail taxi and coach management, minimising noise, litter and disruption.
  - Transport improvements – Payment of financial contributions (each indexed) including £40,000 for bus countdown facilities, £68,720 for pedestrian route improvements, £20,000 for an additional crossing on Blackfriars Road, £67,000 towards cycle hire facilities.
  - Provision of the on-site public realm, to be maintained and unrestricted public access.
  - Highway works – to repave the footway, reconstruct the Pocock Street

vehicle crossover and associated amendments to the traffic management order.

- Parking restriction – no CPZ permits.
- Removal of excess car parking.
- Submission of a travel plan.
- To require the works to the existing building on the site (the roof level and ground level) to be undertaken and completed prior to the occupation of the hotel.
- Administration charge at 2%, payment of £3,914.

172. With the revisions now sought, some of these obligations need to be amended to reflect the necessary mitigation and policy compliance for the minor material amendment application. The amendments would be secured in a deed of variation; the other obligations that do not need to be revised remain unaltered in their original wording in the 2020 section 106 agreement. The change in the floorspace of the proposal does not change the number of construction nor end use jobs and training required by policy. The heads of terms are set out below.

Planning Obligation	Mitigation	Applicant Position
Affordable workspace and community unit	<p>To update the ground floor unit with its increased size and to update the annex 1 drawing that identifies its location.</p> <p>To add in Affordable Workspace Partnership to the definition of “Eligible Tenant”, to allow them to take on the unit if the named “Preferred Tenant” (ASC) does not take it on.</p>	Agreed
Carbon offset	<p>Compliance with the revised energy strategy, or another energy strategy submitted and approved at a later date.</p> <p>Payment of £366,225 (indexed) financial contribution for the remaining 128.5 tonnes per year. If another revised energy strategy is approved which</p>	Agreed



	improves the carbon saving, then the contribution amount would be amended to reflect the better on-site savings.  Addition of the Be Seen monitoring requirements.	
Admin fee	With the addition of the carbon financial contribution, the 2% admin fee would be increased by £7,324.50 to £11,238.50	Agreed
Transport contributions	Cash deposit for the delivery and servicing management increased to £7,700 (indexed).	Agreed

173. The associated definitions and drawings that define parts of the development within the legal agreement would need to be updated accordingly, for example to reference the increased size of the affordable workspace unit and its revised ground floor plan.
174. In the event that a deed of variation has not been completed by 8 June 2023, the committee is asked to authorise the director of planning and growth to refuse permission, if appropriate, for the following reason:

*In the absence of a signed legal agreement there is no mechanism in place to secure development plan compliance (such as carbon offset contribution), mitigation of the transport effects and the benefits of the increased size of the affordable workspace and community unit. It is therefore contrary to policies E3 Affordable workspace, SI2 Minimising greenhouse gas emissions, T4 Assessing and mitigating transport impacts and DF1 Delivery of the Plan and Planning Obligations of the London Plan (2021); P31 Affordable workspace, P50 Highway impacts, P70 Energy, IP2 Transport infrastructure, IP3 CIL and section 106 planning obligations of the Southwark Plan (2022); and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015 as amended).*

### **Other matters**

175. The conditions imposed on the 2020 application would be amended and updated on a new decision to take account of the scheme changes proposed. Where the conditions have already been discharged (for the Blackfriars Road frontage works) the wording would be revised to reflect the details already approved. The

reasons for the conditions have been updated to reference the adopted London Plan and Southwark Plan, rather than the superseded policies that were in place at the time of the 2020 permission.

176. Where new policy requirements are now in place, such as fire safety, circular economy and whole life carbon, additional conditions are included in the recommendation to address these current policies.
177. The planning obligations in the 2020 s106 agreement that are not affected by the proposals, such as those relating to employment and training in construction, local procurement, and employment in the end use, would continue to apply to a new planning permission.

### **Community involvement and engagement**

178. A Statement of Community Involvement was submitted with the application, summarising the engagement carried out by the applicant in July 2022 prior to submission. The engagement methods used had regard to the council's Development Consultation Charter and a completed engagement summary was also provided. The engagement included two stakeholder meetings, updates to ward councillors, a dedicated project website, a flyer distributed to over 2,000 addresses around the site to promote the project website, posters displayed on the site, an in-person drop-in event held near to the site (attended by four people) and an online webinar (attended by one resident).
179. The applicant received 7 feedback surveys, 3 emails and had 78 visits to the project website. The feedback survey asked four questions, with yes/no/don't know options. Further feedback raised a variety of topics: questioned the impact of the increased number of rooms on local services, infrastructure, public transport and roads; potential noise disturbance; what the impacts are to daylight and sunlight; that there is already significant hotel provision in the area; and the need for the sustainability improvements to deliver tangible benefits.
180. Three rounds of pre-application discussions were held about proposed changes with the planning department, and the three written responses have been published on the planning register.
181. On receipt of the application, the council advertised it by press notice, four site notices, and sending over 300 neighbour letters. The consultation responses received have been considered and are summarised in the section below. Eight objections and one support comment were received from members of the public. Consultation responses from internal council departments and external organisations did not raise issues with the proposed amendments, subject to conditions being imposed again.

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

182. The 8 objections received raise the following summarised points:

## 183. Hotel use

- Permission for the hotel should be removed altogether. The area is already oversaturated with hotels. There is no need for another hotel. All the large hotel chains are in the surrounding streets. The council originally said hotels would be along the riverfront. The permission should never have been agreed against the objections made.
- Already a vast accommodation in Southwark and supply exceeds requirement into the 2040s.
- Perhaps the previously lined up operator realised that there is no need for more hotels. The hotel was previously "pre-let" to Ruby Hotels and Ruby would have had very significant input into what its requirements were from a construction perspective. For unspecified reasons the applicant says that the pre-let is now to "Motel-1".
- By granting the 2020 permission all the council did was add value to the land for the owners to sell on to another profit-focused investor, who now seeks to make more money at the expense of the borough's residents.
- This application has rumbled on for years, lurching from appeal to appeal. The changes are not minor or non-material.
- Conflict with local plan.

## 184. Other uses

- We have housing crisis and a cost of living crisis. The land will be lost for more important uses, i.e. housing stock that is desperately needed. The housing allocation was not defended by the council. If the owner refuses to use the site for housing then it should remain for community uses than be lost forever for a pointless hotel.
- A large supermarket with a wide range of essential goods is needed instead.

## 185. Hotel revisions

- If we must have a hotel, we do not need additional hotel rooms, or building height to the plans for this building. The existing plans will impact enormously on neighbour amenity without more hotel rooms or height.
- No one has refreshed the analysis to justify why the area needs another 53 hotel rooms or indeed, any more hotel rooms post-Covid, which has greatly changed the need and demand dynamics.
- It is returning the development to the plans originally rejected by the council in 2018 and at appeal. In 2020, the revised scaled down plan was surprisingly approved (to vast number of concerned parties' dismay), and the present proposal effectively reverts to the rejected one by stealth. The initial proposal had 220 rooms which was reduced to 169 rooms in the approval and now this amendment will increase it by over 30% back to 222 rooms.
- This cynical "minor" supplementary application by the developer restores this monstrous, unneeded and unwanted hotel proposal to its original commercial glory, adding another 53 rooms (+31%) - even more than in the original application which was refused in 2018. The plan is no better

than the rejected one in 2018, and apart from showing a desperation attempt by the developer to maximise its futile investment.

- The number of rooms was a previous reason for refusal: an increase of over 30% cannot in any meaningful sense be classed as "minor". Previous application was amended to reduce the number of rooms. If they were not allowed before they should not be allowed now - for the same reasons.
- There were already previous concerns about the quality of accommodation, but now it has been downgraded further.
- The number of windowless rooms was a reason for refusal of the 2018 scheme and these are proposed or others so close to other buildings as to be all but windowless. Questionable amount of light to the hotel rooms. Many windows on the upper floors face onto the office building, less than 15m away.
- Who would want to stay in a hotel room with no windows, other than the young who will probably be in the roof top bar/terrace.
- Over development.
- The increase in number of rooms in this development is senseless and purely for monetary gains with little regards for the local area. The proposals represent a greater negative impact that, based on previous approved proposals, is not necessary to make the development viable. The changes are substantial and should be scrutinised fully and properly.

#### 186. Neighbour amenity

- The reduced and greenwashed proposal was granted in 2020, despite overwhelming local objection due to its egregious effect on its neighbours. Even as-is, it will now cause misery during construction and continuously in operation, having a severe effect on the physical and mental wellbeing of existing Southwark residents, permanently depriving them of daylight and peace and quiet.
- Residents will lose light and air and the demolition of the existing building and rebuilding will take years of disruption. People studying do not need the noise, dust and pollution that this proposed project would bring. It was already a polluting and disruptive proposal, long objected to by the community, in an already busy area.
- With prospective hotel residents, staff, parking, deliveries, and all the usage that must occur with a large hotel, residents' lives will become even more miserable.
- Close to adjoining properties. The site is surrounded on all sides by residential accommodation.
- Loss of privacy.
- Loss of light. Daylight was one of the reasons the first scheme was refused. Several neighbours will lose more than 5% of daylight, including Sharpley Court.
- The amendments represent an increase in already very high levels of NSL impact at Sharpley Court from the development (based on full room length). Whilst the developer states that NSL impact is reduced when analysis is run on the first 5m of the rooms, it also assumes that any impact (however severe) is acceptable on rooms beyond that depth. The fact in reality is that residents will be massively impacted by loss of light

to rooms above 5m in length, and these amendments represent an unnecessary worsening of that position. In some cases this impact approaches a 40% loss.

- Noise nuisance. This area is generally quiet at night but the plans include rooftop terrace seating that will be used at all hours and will result in evening noise. Serious consideration must be given to how to limit the impact of roof terrace use (and other foot traffic outside the hotel) on locals and the character of the area.
- Light pollution at night.
- Concern at impact on the school with the proposal being only 2m from the boundary, closer and reducing light further.
- Increase in anti-social behaviour in the area now the hotel is to be run as a cheap party hotel instead of an exclusive luxury establishment proposed.
- Since the development was approved already, this is now a damage limitation exercise to stop further negative impact to the neighbourhood. Please seriously consider if this amendment is necessary for the greater good of the people in our borough, instead of the wallets of the developers and investors.

#### 187. Design

- These new proposals include a substantial increase to the building footprint, number of rooms, and height of some parts - as well as changes to the way the roof is used. The new height and scale of the new modification go back to the refused scheme, which was one of the concerns that lead to rejection in 2018.
- The Inspector cited concerns over the height of the hotel and the impact of the hotel on the character of the area. Despite the council planning team swallowing any convenient argument put to them, fail to see any of those concerns to have been sufficiently alleviated.
- Increase in height to parts of the proposal at the south end of the site, which the Inspector already flagged as risking being over-dominating to the traditional building in front.
- Development too high.
- Out of keeping with character of area.
- More open space needed on development.

#### 188. Transport

- Increase to number of rooms will have a knock on effect for things like servicing traffic and noise on Pocock Street. The increase is very substantial and warrants greater scrutiny. It will mean 30% more servicing and deliveries through a single narrow entrance on a residential street.
- The impact of all the heavy traffic on the corner of Blackfriars Road and Webber Street will be a disaster. It is already a dangerous and noisy corner. The hotel will have many comings and goings.
- The traffic consultants for the developer stated they would support measures to mitigate traffic concerns, however these plans do not incorporate a request for the relevant changes to traffic on surrounding roads to be made to stop heavy goods construction and operating vehicles

rat running through them. The Inspector considered rat running as a reason to dismiss the appeal. No conditions have been applied about the traffic by planning officers.

- Inadequate parking provision.
- Inadequate access.
- Increase in traffic.
- Loss of parking.
- Traffic on highways.
- It will cause chaos on the roads and disruption for the local school.

Officer response: rat running was not a specific reason for the appeal scheme being dismissed, only mentioned in the appeal decision as one of the matters raised in addition to the main appeal topics. The s106 requires the construction management plan to include measures to restrict the use of Valentine Place, which would continue to be a requirement of the amended scheme.

189. Other topics

- Strain on existing community facilities.
- Affect local ecology.
- General dislike of proposal.
- Increase of pollution.
- Information missing from plans.
- Not enough info given on application.

190. Consultation

- The applicants want to impose their change of heart in occupier to the detriment of local residents. Objecting to the various iterations has taken a considerable toll on various local residents. It is not acceptable that this further back and forth seemingly at the whim of the prospective occupier takes a yet larger toll and causes yet more anguish. It should be treated for what it is - an abuse of the planning process. Given the significant changes proposed, at the very least there should be a further open planning meeting where residents can raise their objections.
- Sickened and incensed by this new application and it should be refused, with an inquiry opened into how the 2020 grant was justified.
- The consultation by the developer was not properly designed, as people could only comment on the developer's own conclusions, and not the proposals themselves. The open day was during the emergency warning for extreme heat. There is a significant risk the responses do not properly represent the views and interests of locals.
- Planning website not working so proper consultation has not actually taken place.

Officer response: The application was advertised from September (by letters, site notices and press notice) and all comments received before this report was finalised have been summarised above.

191. One comment in support was received from a neighbour that the new team behind the proposal has been engaging and transparent and working with the

neighbour to ensure a boundary that suits them and the neighbour. Supports the plan to regenerate the disused car park and to build a hotel with the enlarged affordable workspace as part of the plan.

### **Consultation responses from external and statutory consultees**

192. **Environment Agency** – there is no change of position, with the response to the previous application unchanged, which asked for the inclusion of a condition regarding ground floor finished floor level on any permission.
193. **Met Police** – there is nothing within the amendments sought that would negatively impact upon the potential for crime and antisocial behaviour at this location. Refer back to the response to the initial application for this site which details some of the likely Secured by Design and crime prevention requirements as well as a request for a condition if permission is granted.
194. **Thames Water** – has no objection in terms of combined waste water, but in its first consultation response identified an inability of the existing water network infrastructure to accommodate the needs of this proposal. Therefore the initial response requested a condition be added to any planning permission to prevent occupation until all water network upgrades to serve the development have been completed or an infrastructure phasing plan has been agreed. However following further correspondence with the applicant, Thames Water has removed the request for a condition and now raises no objection in terms of water network capacity. Other comments can be used as informatives.
195. **Transport for London** – the proposed amendments do not significantly alter construction logistics, deliveries and servicing and the frontage on Blackfriars Road, which are the key concerns of TfL due to the adjacency of the TLRN. Expect the approved construction logistics plan and delivery and servicing plan to be updated if necessary to reflect the changes proposed, to 'carry forward' and continue to apply. The number of bedrooms, and therefore logically the trip generation for the hotel, is proposed to increase by c 30%. The council may consider it appropriate to uplift relevant s106 contributions secured for the extant permission accordingly. The canopy proposed at the hotel entrance on Blackfriars Road which may require an oversail licence from TfL if it extends over the public highway boundary.

### **Consultation responses from internal consultees**

196. **Environmental protection team** – reviewed the proposed changes and the revised noise report. The conditions on the 2020 permission would address and control EPT relevant issues. No major concerns from the proposed amendments to the scheme.
197. **Flooding team** – reviewed the statement of conformity on flood risk and drainage and has no objections to the amendments.
198. **Highways development management** – no comment.

199. **Local economy team** – There is an overall increase in space of 408sqm GEA, which would not justify an increase in construction jobs from the approved scheme. The affordable workspace will be secured through a section 106 legal agreement and will ensure that the proposal assists businesses in the local area. Construction phase jobs and training, end use jobs comments on the 2020 application continue to apply.

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

200. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
201. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
202. 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.
203. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. The proposed revisions to the approved scheme are considered not to raise equalities considerations. The proposal continues to provide accessible bedrooms and inclusive access to the new public realm and buildings. The impacts upon neighbouring properties, including the school, are similar to those of the approved scheme. The new public realm would be usable



by members of the public at all times, and the hotel reception would provide public facilities. The construction phase, the hotel and flexible use unit would provide job opportunities.

### **Human rights implications**

204. 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.
205. This application has the legitimate aim of seeking revisions to a permission for a hotel-led scheme. 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**

206. 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.
207. 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?	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?	No

### **CONCLUSION**

208. The proposed amendments would intensify the approved hotel use of the site, in

a building that is of broadly the same scale and architecture as the approved scheme. The proposed hotel rooms are smaller than the approved scheme, however the overall quality of the accommodation would remain acceptable, and the hotel reception again would provide facilities open to the public. It would have similar impacts on neighbour amenity, transport and highways. A larger affordable workspace/community unit would be provided, at the same rental terms as the approved scheme.

209. The increased number of bedrooms results in a higher carbon emission (due to the larger hot water demand) than the approved scheme and while the application proposes more PV panels, its percentage reduction is less than the approved scheme. To achieve the net zero carbon requirement of current policy, a financial payment is proposed, which was not a requirement of the 2020 permission. The public courtyard would remain as approved, and further green roof planting provided.
210. It is therefore recommended that the amended planning permission be granted, subject to the revised and additional conditions set out in the recommendation, and completion of a deed of variation to secure the changes to the 2020 legal agreement.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Environment, Neighbourhoods and Growth, 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: <a href="mailto:planning.enquiries@southwark.gov.uk">planning.enquiries@southwark.gov.uk</a> Case officer telephone: 0207 525 1214 Council website: <a href="http://www.southwark.gov.uk">www.southwark.gov.uk</a>

## APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policies and material considerations
Appendix 3	Relevant planning history
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received

**AUDIT TRAIL**

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth		
<b>Report Author</b>	Victoria Crosby, Team Leader		
<b>Version</b>	Final		
<b>Dated</b>	23 February 2023		
<b>Key Decision</b>	No		
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>			
<b>Officer Title</b>		<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance		No	No
Strategic Director, Environment, Neighbourhoods and Growth		No	No
Strategic Director of Housing		No	No
<b>Date final report sent to Constitutional Team</b>			23 February 2023

**APPENDIX 1****RECOMMENDATION**

This document shows the case officer's recommended decision for the application referred to below.

This document is not a decision notice for this application.

---

<b>Applicant</b>	160 BFR Holdco Ltd	<b>Reg. Number</b>	22/AP/3049
<b>Application Type</b>	S.73 Vary/Remove Conds/Minor Alterations		
<b>Recommendation</b>		<b>Case Number</b>	1390-157

**Draft of Decision Notice**

**The variation is AGREED (subject to completion of legal agreement) for the following development:**

Minor material amendments by variation of Condition 1 'Approved Plans' and Condition 30 'Number of Hotel Bedrooms' of planning permission ref. 20/AP/0556 (Erection of an eight storey building with basement, comprising a hotel (Class C1), flexible commercial or community unit (Class B1/D1), retail floorspace (Class A1/A3), creation of public space, landscaping and associated works. Works to the existing office building at ground and roof levels (including a new rooftop terrace, balustrades and PV panels); elevational alterations; and alterations associated with the creation of a new entrance on the Blackfriars Road elevation).

160 Blackfriars Road London Southwark SE1

**In accordance with application received on 1 September 2022 and Applicant's Drawing Nos.**

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

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

GA ELEVATION WEST PROPOSED L(00) 156 REV A received 01/09/2022  
 GA ELEVATION NORTH PROPOSED L (00) 158 REV A received 01/09/2022  
 GA ELEVATION SOUTH PROPOSED L (00) 159 REV A received 01/09/2022  
 GA ELEVATION SERVICE YARD NORTH PROPOSED L (00) 160 REV A received 01/09/2022  
 GA ELEVATION GROUND FLOOR SINGLE STOREY PROPOSED L (00) 161 REV A received 01/09/2022  
 GA ELEVATION FRONT L (00) 171 REV A received 01/09/2022  
 BLACKFRIARS ENTRANCE ELEVATION FOR INFORMATION  
 LRW\_8258\_L(00)171A received 13/09/2022

HOTEL ENTRANCE PROPOSED ELEVATIONS PLANNING  
 LRW\_8258\_L(00)172A received 13/09/2022  
 EAST ELEVATION PROPOSED PLANNING LRW\_8258\_L(00)157C received  
 19/12/2022  
 GA SECTION AA PROPOSED L (00) 162 REV A received 01/09/2022  
 SECOND LEVEL GA PLAN L (00) 165 received 01/09/2022  
 THIRD LEVEL GA PLAN L (00) 166 received 01/09/2022  
 FOURTH LEVEL GA PLAN L (00) 167 received 01/09/2022  
 SIXTH LEVEL GA PLAN L (00) 169 received 01/09/2022  
 GA SECTION FF PROPOSED L (00) 170 received 01/09/2022  
 FIRST LEVEL GA PLAN L (00) 152 REV A received 01/09/2022  
 SEVENTH FLOOR GA PLAN L (00) 154 REV A received 01/09/2022  
 FIFTH LEVEL GA PLAN LRW\_8258\_L(00)168A received 13/09/2022  
 BASEMENT LEVEL GA PLAN LRW\_8258\_L(00)151B received 28/11/2022  
 ROOF PLAN LRW\_8258\_L(00)155C received 28/11/2022  
 PLANTER DETAIL LRW\_8258\_L(00)176 received 28/11/2022  
 GROUND FLOOR GA PLAN PLANNING LRW\_8258\_L(00)150D received  
 19/12/2022

Reason:

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

2. The development hereby permitted shall be begun no later than 1 September 2023.

Reason:

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

**Permission is subject to the following Pre-Commencements Condition(s)**

**3. INCLUSIVE ACCESS TO BASEMENT**

Prior to any below ground works hereby authorised being undertaken, a detailed plan showing step free access from the basement car parking area to ground floor level of the hotel and workspace/community use unit, and detailing any valet parking arrangements shall be submitted to and approved in writing by the Local Planning Authority. The development shall be constructed in accordance with the approved details.

Reason:

To ensure that disabled people and the mobility impaired have appropriate means of access and egress to the basement parking areas in accordance with the National Planning Policy Framework (2021), D5 Inclusive access of the London Plan (2021) and P13 Design of places and P55 Parking standards for disabled people and the physically impaired the Southwark Plan (2022).

#### 4. ARCHAEOLOGICAL FIELDWORK

Prior to any below ground works hereby authorised being undertaken, the applicant shall:

A. Implement the programme of archaeological evaluation (initial investigative trial trenching) in accordance with the written scheme of investigation (WSI) approved by ref. 21/AP/0861 unless an alternative WSI is submitted to and approved in writing by the Local Planning Authority;

B. Report on the results of these evaluation works as approved by the Local Planning Authority in ref. 21/AP/2740 or an alternative report submitted to and approved in writing by the Local Planning Authority;

C. The implementation of a further programme of archaeological work, known as archaeological mitigation. Archaeological mitigation can involve a range of possible options, including: preservation of archaeological remains by record (archaeological excavation and removal); and/or in situ (preservation on the site by design or by the implementation of an approved preservation regime); or further options to investigate, monitor (watching brief), model or sample archaeological deposits. This further programme of archaeological work shall be in accordance with a second (Stage C) written scheme of investigation (WSI) for archaeological mitigation, which shall be submitted to the Local Planning Authority for approval in writing.

Reason:

To ensure the preservation of archaeological remains by record or in situ, to identify and record any features of archaeological interest discovered during the works, and in order to mitigate the impact of the works on the archaeological resource, in accordance with the National Planning Policy Framework (2021), HC1 Heritage conservation and growth of the London Plan (2021), and P14 Design quality and P23 Archaeology of the Southwark Plan (2022).

#### 5. BASEMENT AND FOUNDATION DESIGN

Prior to any below ground works hereby authorised being undertaken, a detailed scheme showing the complete scope and arrangement of the basement and foundation design, and all associated subterranean groundworks, including the construction methods shall be submitted to and approved by the Local Planning Authority. The submitted documents should show how archaeological remains will be protected by a suitable mitigation strategy. 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 HC1 Heritage conservation and growth of the London Plan (2021), P14 Design quality and P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework (2021).

## 6. SITE CONTAMINATION

a) The site investigation and risk assessment shall be completed in accordance with the scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site as approved by ref. 21/AP/0696 unless an alternative site investigation and risk assessment is submitted to and approved by the Local Planning Authority:

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 P64 Contaminated land and hazardous substances of the Southwark Plan (2022) and the National Planning Policy Framework (2021).

## 7. BASEMENT IMPACT ASSESSMENT

No below ground works shall commence until suitable investigations are undertaken to determine the ground and groundwater conditions (including levels) at the site and a Basement Impact Assessment (BIA) have been submitted to and approved in writing by the Local Planning Authority. This should include groundwater flood risk mitigation measures as required, with the measures constructed to the approved details. The BIA shall assess if the lowest level of the basement will be above, or below the groundwater levels recorded from the ground investigations. The BIA shall consider fluctuations in groundwater levels and the risks this can pose to the site and shall include a plan of the basement area within the boundary of the site, with any known (investigated) basements and subterranean structures adjacent to the site. This is to see if there may be a risk of obstructing groundwater flows which could potentially cause a build up of pressure on the upstream side of the subterranean structures.

Further guidance on preparing BIA can be found in appendix to our SFRA 2016 here:

<https://www.southwark.gov.uk/environment/flood-risk-management/strategic-flood-risk-assessmentsfra-chapter=2>

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

Reason:

To minimise the potential for the site to contribute to changes in groundwater conditions and any subsequent flooding in accordance with the Southwark Strategic Flood Risk Assessment (2016), the National Planning Policy Framework (2021), SI12 Flood risk management and SI13 Sustainable drainage of the London Plan (2021) and P14 Design quality and P68 Reducing flooding risk of the Southwark Plan (2022).

## 8. TREE PROTECTION

1) Prior to works commencing, including any demolition, for the hotel or workspace/community unit an Arboricultural Method Statement including an Arboricultural Survey of the trees near the eastern and southern boundaries of the site shall be submitted to and approved in writing by the Local Planning Authority.

a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal.

b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative



pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.

c) Cross sections shall be provided to show surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation.

2) The approved works including any demolition, on the Blackfriars Road frontage alterations (including the ramps, stairs, retaining walls, ground level balustrade, entrance canopy), shall be undertaken only in accordance with the Arboricultural Method Statement and details approved by ref. 21/AP/1974 unless an alternative Statement and cross sections are submitted to and approved in writing by the Local Planning Authority.

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

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

#### Reason

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with the National Planning Policy Framework (2021), G1 Green infrastructure, G5 Urban greening, G6 Biodiversity and access to nature and G7 Trees and woodlands of the London Plan (2021) and P13 Design of places, P60 Biodiversity and P61 Trees of the Southwark Plan (2022).

## 9. SECURED BY DESIGN

a) The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development, in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the relevant parts of the development in part i) or part ii) below and shall be implemented in accordance with the approved details prior to occupation:

i) for the hotel or workspace/community unit;

ii) for the office entrance, public realm or the Blackfriars Road frontage alterations (including the ramps, stairs, retaining walls, ground level balustrade, entrance canopy) as approved by ref. 21/AP/3094 unless other details are submitted to and approved in writing by the Local Planning Authority.

b) Prior to first occupation of the development a satisfactory Secured by Design inspection must take place and the resulting Secured by Design certificate submitted to and approved by the Local Planning Authority.

Reason:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with: the National Planning Policy Framework (2021), D11 Safety, security and resilience to emergency of the London Plan (2021), P16 Designing out crime of the Southwark Plan (2022).

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

#### **10. MATERIAL SAMPLES**

a) Prior to above grade works commencing for those parts of the development comprising the hotel, workspace/community unit, sample panels of all external facing materials (including the brickwork styles, brick, bonding, coursing to the hotel and workspace/community unit) to be used in the carrying out the relevant part of the development shall be made available for inspection 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. The materials for the office entrance and retail unit shall be undertaken in accordance with the details approved by ref. 21/AP/2095 unless other details are submitted to and approved in writing by the Local Planning Authority.

b) The Blackfriars Road frontage alterations (including those parts of the development comprising the ramps, stairs, retaining walls, ground level balustrade, entrance canopy and roof level balustrade), shall be carried out in accordance with the details and samples of all external facing materials approved by refs. 21/AP/2095 and 22/AP/2577, unless other details are submitted to and approved in writing by the Local Planning Authority.

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 (2021), D4 Delivering good design of the London Plan (2021), and P13 Design of places and P14 Design quality of the Southwark Plan (2022).

## 11. DETAILED DRAWINGS

Prior to above grade works commencing for the hotel, workspace/community unit, section detail-drawings at a scale of at least 1:10 through:

- the facades;
- parapets; and
- heads, cills and jambs of all openings

to be used in the carrying out the relevant part of this permission shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given.

The facades of the office entrance and retail unit, entrance ramps and stairs on the Blackfriars Road frontage shall be constructed in accordance with the detailed drawings approved in ref. 21/AP/2096 and 22/AP/2614 unless details are submitted to and approved by the Local Planning Authority.

Reason:

In order that the Local Planning Authority may be satisfied as to the quality of the design and details in accordance with the National Planning Policy Framework (2021), D4 Delivering good design of the London Plan (2021), and P13 Design of places and P14 Design quality of the Southwark Plan (2022).

## 12. HARD AND SOFT LANDSCAPING

a) The hard and soft landscaping scheme showing the treatment of the alterations to the Blackfriars Road frontage (including cross sections, surfacing materials, layouts, and edge details), shall be undertaken in accordance with the detailed approved by ref. 21/AP/2097 unless other details are 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.

b) Prior to above grade works commencing for the hotel, workspace/community unit (whichever is first) detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings and not addressed by part a) above (including cross sections, surfacing materials of any pathways, layouts, materials and edge details), tree pits in the new public realm, green walls and raised planters around the courtyard, 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.

c) 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 (2021), D8 Public realm, G1 Green infrastructure, G5 Urban greening, G6 Biodiversity and access to nature and G7 Trees and woodlands of the London Plan (2021) and P13 Design of places, P59 Green infrastructure, P60 Biodiversity and P61 Trees of the Southwark Plan (2022).

### 13. ROOFS FOR BIODIVERSITY

- a) Prior to above grade works commencing for the hotel, workspace/community unit, details of 783sqm of 'biosolar' green roofs and blue roofs to the hotel building hereby approved shall be submitted to and approved in writing by the Local Planning Authority. The green roofs shall be:
  - o biodiversity based with extensive substrate base (depth 80-150mm);
  - o laid out in accordance with agreed plans; and
  - o 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).
- b) The 'biosolar' green roofs to the retained office building shall be carried out in accordance with the details approved by ref. 21/AP/2751 unless other details are submitted to and approved in writing by the Local Planning Authority. The green roofs shall be:
  - o biodiversity based with extensive substrate base (depth 80-150mm);
  - o laid out in accordance with agreed plans; and
  - o 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).
- c) The green and blue roofs 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 development shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.
- d) Discharge of this condition will be granted on receiving the details of the green and blue roofs and Local Planning Authority 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 G1 Green infrastructure, G5 Urban greening and G6 Biodiversity and access to nature of the London Plan (2021), P13 Design of places, P59 Green infrastructure and P60 Biodiversity of the Southwark Plan (2022).

#### 14. SWIFT NESTING BRICKS

Prior to above grade works commencing for the hotel or workspace/community unit, details of Swift nesting bricks, shall be submitted to and approved in writing by the Local Planning Authority. No fewer than 12 nesting bricks shall be provided and the details shall include the exact location, specification and design of the habitats. The bricks shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

The Swift nesting 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 features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the nest 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 G1 Green infrastructure, G5 Urban greening and G6 Biodiversity and access to nature of the London Plan (2021), and P59 Green infrastructure and P60 Biodiversity of the Southwark Plan (2022).

#### 15. CYCLE STORAGE DETAILS

Prior to above grade works commencing for the hotel or workspace/community unit or the cycle store building, details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles for staff and visitors including elevations of the cycle store shall be submitted to and approved in writing by the Local Planning Authority. The details as a minimum shall be in accordance with the London Plan Intend to Publish, and demonstrate how they comply with the London Cycle Design Standards (2016). The cycle parking shall be installed prior to the first occupation of the development. 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 (and that the store building does not cause harm to neighbour amenity) in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with: the National Planning Policy Framework (2021), T5 Cycling of the London Plan (2021), P53 Cycling and P56 Protection of amenity of the Southwark Plan (2022).

#### 16. INTERNAL VENTILATION

Prior to above grade works commencing for the hotel or workspace/community unit, full particulars and details of a scheme for the internal ventilation of the development which shall include; appropriately located plant, inlets and outlets; filtration and treatment of incoming air to ensure it meets the national standards for external air quality; plant noise output levels; and a management and maintenance plan shall be submitted to and approved by the Local Planning Authority. The development shall be carried out prior to first occupation of the hotel or workspace/community unit, operated and maintained in accordance with the approval given.

Reason:

In order that the Local Planning Authority may be satisfied that the ventilation, ducting, filtration/treatment and ancillary equipment is incorporated as an integral part of the development for this site with external air quality below the national standard, in the interests of amenity in accordance with SI1 Improving air quality of the London Plan (2021), and P41 Hotels and other visitor accommodation and P65 Improving air quality of the Southwark Plan (2022).

**Permission is subject to the following Pre-Occupation Condition(s)**

#### 17. LANDSCAPING MANAGEMENT PLAN

Prior to first occupation of the hotel or workspace/community unit (whichever is first) hereby permitted, a landscape management plan, including long- term design objectives, management responsibilities and maintenance schedules for all landscaped areas and ecological features, 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.

The scheme shall include the following elements: public realm, biodiverse roofs, green walls, bird nesting features.

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, in line with the National Planning Policy Framework (2021), D8 Public realm of the London Plan (2021) and P59 Green infrastructure of the Southwark Plan (2022). 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.

## 18. DETAILS OF THE REFUSE STORAGE FACILITIES

Before the first occupation of the hotel or workspace/community unit (whichever is first) hereby permitted, details of the arrangements for the storing of refuse shall be submitted to and approved in writing by the Local Planning Authority and the approved facilities shall be provided and made available for use by the occupiers of the development. 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 (2021), S17 Reducing waste and supporting the circular economy, and P56 Protection of amenity and P62 Reducing waste of the Southwark Plan (2022).

## 19. COMMERCIAL KITCHEN EXTRACT VENTILATION

Prior to the commencement of use of the hotel or retail unit, full particulars and details of a scheme for the extraction and venting of odours, fats and particulate matter from the cooking activities from the kitchens within that part of the development shall be 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. Any exhaust flue from the commercial kitchen shall terminate at 1m above the building eaves.

Reason:

In order to ensure that any installed ventilation, ducting and ancillary equipment in the interests of amenity will not cause amenity impacts such as odour, fume or noise nuisance and will not detract from the appearance of the building in accordance with the National Planning Policy Framework (2021), P14 Design

quality, P56 Protection of amenity and P66 Reducing noise pollution and enhancing soundscapes of the Southwark Plan (2022).

## 20. NOISE FROM AMPLIFIED MUSIC FROM NON-RESIDENTIAL PREMISES

Prior to the commencement of use of the Class A3 and Class D1 premises a scheme of sound insulation shall be submitted to the Local Planning Authority for approval. The 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 at 1m from the facade of nearby residential premises at all third octave bands between 63Hz and 8kHz. The scheme of sound insulation shall be constructed and installed in accordance with the approval given and shall be permanently maintained thereafter. Following completion of the development and prior to the commencement of use of the commercial premises a validation test shall be carried out. The results shall be submitted to the Local Planning Authority for approval in writing.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities associated with non-residential premises in accordance with the National Planning Policy Framework (2021), D14 Noise of the London Plan (2021), P14 Design quality, P56 Protection of amenity and P66 Reducing noise pollution and enhancing soundscapes of the Southwark Plan (2022).

## 21. BREEAM

a) Prior to first occupation of the hotel or workspace/community unit (whichever is first) hereby permitted, the Local Planning Authority shall receive from the applicant and give written approval of an interim report/letter (together with any supporting evidence) from the licensed BREEAM assessor. The report/letter shall confirm that sufficient progress has been made in terms of detailed design, procurement and construction to be reasonably well assured that the development hereby approved will, once completed, achieve at least a BREEAM "Excellent" rating.

b) Within six months of first occupation of the development 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 BREEAM rating of at least "Excellent" has been met.

Reason:



To ensure the proposal complies with the National Planning Policy Framework (2021), SI2 Minimising greenhouse gas emissions, SI7 Reducing waste and supporting the circular economy and G5 Urban greening of the London Plan (2021) and P69 Sustainability standards of the Southwark Plan (2022).

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

**22. RESTRICTION ON THE INSTALLATION OF 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 or a separate planning application, shall be placed on the roofs or be permitted to project above the roofline of any part of the building as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosures of any building hereby permitted.

Reason:

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with the National Planning Policy Framework (2021), P13 Design of places and P14 Design quality of the Southwark Plan (2022).

**23. RESTRICTION ON THE INSTALLATION OF TELECOMMUNICATIONS EQUIPMENT**

Notwithstanding the provisions of Part 16 of The Town & Country Planning (General Permitted Development) Order 2015 (as amended or re-enacted) no external telecommunications equipment or structures shall be placed on the roofs or any other part of a building hereby permitted, unless details of any telecommunications equipment specifically required for the hotel use only are submitted to and approved by the Local Planning Authority prior to its installation.

Reason:

In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with: the National Planning Policy Framework (2021), P13 Design of places, P14 Design quality and P56 Protection of amenity of the Southwark Plan (2022).

**24. ELECTRIC VEHICLE CHARGING**

An electric vehicle charging point shall be provided to service a minimum of 50% of the car parking spaces provided for the development.

Reason:

To encourage the uptake of electric and hybrid vehicles and minimise the effect of the development on local air quality within the designated Air Quality Management Area in line with S11 Improving air quality and T6 Car parking of the London Plan (2021), P65 Improving air quality and P54 Car parking of the Southwark Plan (2022).

## 25. TERRACE HOURS OF USE

The roof terrace on the retained office building shall be open to office workers only, and shall not be in use after 22:00 on any day. The roof terrace shall at no time be open to or used by guests of the hotel hereby permitted.

Reason:

To safeguard the amenities of neighbouring residential properties in accordance with the National Planning Policy Framework (2021), and P14 Design quality and P56 Protection of amenity of the Southwark Plan (2022).

## 26. ROOFS TO BE USED ONLY IN EMERGENCY

The roofs of the hotel building hereby approved shall not be used other than as a means of escape 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 (2021), and P14 Design quality and P56 Protection of amenity of the Southwark Plan (2022).

## 27. CLASS A3 HOURS OF USE

The commercial Class A3 use hereby permitted shall not be carried on outside of the hours of 08:00 to 23:00 on Sunday to Thursday, 08:00 to 00:00 Friday and Saturdays.

Reason:

To safeguard the amenities of neighbouring residential properties in accordance with the National Planning Policy Framework (2021), and P14 Design quality and P56 Protection of amenity of the Southwark Plan (2022).

## 28. SERVICING HOURS

Any deliveries or collections to the hotel and workspace/community unit shall only be between the following hours: 08:00 to 18:00 on Monday to Fridays, and 09:00 to 14:00 Saturdays. No deliveries or servicing shall take place on Sundays or Bank Holidays.

Reason:

To safeguard the amenity of neighbouring residential properties in accordance with the National Planning Policy Framework (2021), and P14 Design quality and P56 Protection of amenity of the Southwark Plan (2022).

## 29. RESTRICTION ON USE WITHIN THE USE CLASS HEREBY PERMITTED

Notwithstanding the provisions of Class D1 of the Town and Country Planning (Use Classes) Order and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment or enactment of those Orders) the use hereby permitted of the ground floor Class D1 unit shall not include any use as a place of worship, school, children's nursery or gym.

Reason:

Limited information of the precise use of the ground floor unit has been provided by the applicant, and given the broad range of uses within Class D1 the Local Planning Authority wishes to have the opportunity of exercising control over any subsequent alternative use within Class D1 particularly those that raise noise and transport issues that would require a detailed assessment, in accordance with: the National Planning Policy Framework (2021), and P56 Protection of amenity of the Southwark Plan (2022).

## 30. NUMBER OF HOTEL BEDROOMS

The building hereby approved shall comprise a maximum of 222 hotel bedrooms.

Reason:

To ensure that the development is carried out in accordance with the approved plans and documents and otherwise conforms to the principles of sustainable development as described in the National Planning Policy Framework (2021).

## 31. FLOOD RISK ASSESSMENT

The ground floor finished floor level must be set no lower than 4.27m AOD metres above Ordnance Datum (mAOD), in line with the submitted '1561 - Blackfriars Road | Flood Risk Assessment and Drainage Strategy Report' by Heyne Tillett Steel (HTS) dated February 2020; Rev C as updated by the S73 - Statement of Conformity by Heyne Tillett Steel dated 1/8/22, unless an alternative flood risk assessment is submitted to and approved by the Local Planning Authority.

Reason:

To ensure: the development is designed safely in reference to flood risk in accordance with the National Planning Policy Framework (2021), SI2 Flood risk management of the London Plan (2021) and P68 Reducing flood risk of the Southwark Plan (2022).

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

**32. REPORTING OF ARCHAEOLOGICAL WORK**

Within six months 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 P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework (2021).

**33. PLANT NOISE**

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. Prior to the plant being commissioned a validation test shall be carried out following completion of the development. The results shall be submitted to the Local

Planning Authority for approval in writing. 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 (2021), D14 Noise of the London Plan (2021) and P14 Design quality and P56 Protection of amenity of the Southwark Plan (2022).

#### 34. EXTERNAL LIGHTING

Details of any external lighting (including: design; power and position of luminaries; light intensity contours) of all affected external areas (including areas beyond the boundary of the development) shall be submitted to and approved by the Local Planning Authority prior to the installation of any such lighting. The external lighting to the Blackfriars Road frontage shall be installed and operated in accordance with the details approved by ref. 21/AP/2098 unless other details are submitted to and approved by the Local Planning Authority. Prior to the external lighting being commissioned for use, a validation report shall be submitted to the Local Planning Authority for approval in writing. The development shall not be carried out or operated otherwise than in accordance with any such approval given. Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILE) Guidance Note 1 for the reduction of obtrusive light (2020).

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 amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with the National Planning Policy Framework (2021), and P14 Design quality, P16 Designing out crime and P56 Protection of amenity of the Southwark Plan (2022).

#### 35. SCREENING TO WINDOWS

Prior to the commencement of the hotel or workspace/community unit development, details of how the four hotel bedroom windows at the ground floor southern elevation are to be screened or provided with obscure glazing or such other privacy measure, shall be submitted to and approved in writing by the Local Planning Authority. These windows shall be constructed in accordance with the approved details, and retained as such.

Reason:

To protect the amenity of the neighbouring residential properties on Webber Street, to comply with P56 Protection of amenity of the Southwark Plan (2022).

### 36. FIRE STATEMENT

The development hereby permitted shall be carried out in accordance with the Fire Planning Statement by Norman Disney and Young dated 14 November 2022, unless a revised fire statement is submitted to and approved in writing by the Local Planning Authority prior to the relevant works being carried out.

Reason:

In order to ensure that the fire safety of the proposed development has been duly considered, as required by policy D12 Fire safety of the London Plan (2021).

### 37. USE CLASSES

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment of enactment of those Orders), and notwithstanding the other uses within Class E:

- the office floorspace hereby approved shall be used for Use Class E(g)(i) office purposes only;
- the retail floorspace hereby approved shall be used for Use Class E(a), E(b) and/or E(c) retail, professional services and/or cafe and restaurant purposes only;
- the hotel floorspace hereby approved shall be used for Use Class C1 hotel purposes and ancillary reception purposes only;
- the workspace/community unit shall be used for Use Class E(g) and/or F1 purposes only (and subject to the restriction on F1 uses in condition 29).

Reason:

In order to ensure that the site provides office, retail, workspace or community and hotel uses for this site within the Central Activities Zone, Opportunity Area and town centre in line with its assessment, to comply with policies SD1 Opportunity Areas, SD4 The Central Activities Zone, SD6 Town centres and high streets, E3 Affordable workspace of the London Plan (2021), and policies P30 Offices and business development, P31 Affordable workspace, P35 Town and local centres, P41 Hotels and other visitor accommodation and P47 Community uses of the Southwark Plan (2022) and as other uses within these Classes may have different impacts than those assessed within the application.

### Informatives

1 The application site falls within 'Town Centre' designation of the SSDM and the footways should be paved with granite natural stone paving slabs with 300mm wide granite kerbs. The applicant is to note that surface water from private areas is not permitted to flow onto public highway in accordance with Section 163 of the Highways Act 1980. Detailed drawings should be submitted as part of the s278 application confirming this requirement.

2 Air quality at this location does not meet the national standard for NO<sub>2</sub>. It is recommended that any external doors are fitted with automatic closers and that any air intake for ventilation purposes is situated on the rear façade of the development or the façade furthest from emissions sources such as busy roads.

3 The applicant is advised that to discharge the cycle parking condition, TfL expects to see the proposed layout accommodating at least:

- London Plan standard quantum of cycle parking;
- At least five per cent of cycle parking should be Sheffield stands at wider spacing for larger cycles (1.8m spacing);
- A proportion of standard spaced Sheffield stands to ensure a good mix of cycle parking solutions (for all ages and abilities).
- 2500mm in front of the lowered frame of each two-tier rack.
- The cycle parking will be assessed using the latest version of policy and LCDS.

4 The applicant is advised of the following comments from Thames Water:

As required by Building regulations part H paragraph 2.36, Thames Water requests that the applicant should incorporate within their 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. TW 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 [wwriskmanagement@thameswater.co.uk](mailto:wwriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.

There are public sewers crossing or close to the development. If planning significant work near TW sewers, it is important that the applicant minimises the risk of damage. TW will need to check that the development doesn't limit repair or maintenance activities, or inhibit the services TW provides in any other way. The applicant is advised to read TW guide Working Near Or Diverting Our Pipes.

If you are planning on using mains water for construction purposes, it is important the applicant let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at [thameswater.co.uk/buildingwater](http://thameswater.co.uk/buildingwater).

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres per minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

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 TW's guide Working Near Our Assets to ensure workings are in line with the necessary processes needing to follow if considering working above or near TW's pipes or other structures.

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 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://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)



## RELEVANT PLANNING POLICIES AND MATERIAL CONSIDERATIONS

### Planning policy and material considerations

#### National Planning Policy Framework

1. The revised National Planning Policy Framework ('NPPF') was published on 20 July 2021 which sets out the national planning policy. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. Paragraph 218 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 15 Conserving and enhancing the natural environment  
 Chapter 16 Conserving and enhancing the historic environment.

#### The London Plan 2021

2. On 2 March 2021, the Mayor of London published the London Plan 2021. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London. The relevant policies are:  
 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  
 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  
 D10: Basement development

D11: Safety, security and resilience to emergency  
 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  
 E10: Visitor infrastructure  
 E11: Skills and opportunities for all  
 HC1: Heritage conservation and growth  
 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  
 SI4: Managing heat risk  
 SI5: Water infrastructure  
 SI6: Digital connectivity infrastructure  
 SI7: Reducing waste and supporting the circular economy  
 SI12: Flood risk management  
 SI13: Sustainable drainage  
 T1: Strategic approach to transport  
 T2: Healthy streets  
 T3: Transport capacity, connectivity and safeguarding  
 T4: Assessing and mitigating transport impacts  
 T5: Cycling  
 T6: Car parking  
 T7: Deliveries, servicing and construction  
 T9: Funding transport infrastructure through planning  
 DF1: Delivery of the Plan and planning obligations.

### Southwark Plan

3. The Southwark Plan (2022) has been adopted recently. It was approved by Cabinet on 7 December 2021 and proceeded to final adoption by Council Assembly on 23 February 2022. The Southwark Plan (2022) has replaced the saved policies of the Southwark Plan (2007), the Core Strategy (2011), the Aylesbury Area Action Plan (2010), the Peckham and Nunhead Area Action Plan (2014) and the Canada Water Area Action Plan (2015).
4. The earlier version, known as the New Southwark Plan was submitted to the Secretary of State in January 2020. The Examination in Public (EiP) for the NSP took place between February and April 2021. The Inspectors wrote a post hearings letter on 28 May 2021 and under Section 20(7)(c) of the Planning and Compulsory Purchase Act (2004) the Council asked the Inspectors to recommend Main Modifications to ensure the Plan is sound. The Council consulted on the Main Modifications as recommended by the Inspectors from 6 August 2021 to 24 September 2021. The Inspectors published their final report

and the Plan proceeded to adoption.

5. The Southwark Plan (2022) includes Strategic Policies, Area Visions and Development Management Policies. The most relevant strategic policies are as follows:
  - ST1 Southwark's Development Targets
  - ST2 Southwark's Places
  - SP2 Southwark Together
  - SP3 A great start in life
  - SP4 Green and inclusive economy
  - SP5 Thriving and neighbourhoods and tackling health equalities
  - SP6 Climate emergency.
6. The site is within the AV.04 Blackfriars Road Area Vision and is site allocation NSP17 Friars House, 157-168 Blackfriars Road.
7. The most relevant development management policies of the Southwark Plan are as follows:
  - P13 Design of places
  - P14 Design quality
  - P16 Designing out crime
  - P18 Efficient use of land
  - P19 Listed buildings and structures
  - P20 Conservation areas
  - P21 Conservation of the historic environment and natural heritage
  - P23 Archaeology
  - P28 Access to employment and training
  - P30 Office and business development
  - P31 Affordable workspace
  - P33 Business relocation
  - P35 Town and local centres
  - P39 Shop fronts
  - P41 Hotels and other visitor accommodation
  - P44 Broadband and digital infrastructure
  - P45 Healthy development
  - P47 Community uses
  - P49 Public transport
  - P50 Highway impacts
  - P51 Walking
  - P53 Cycling
  - P54 Car parking
  - P55 Parking standards for disabled people and the physically impaired
  - P56 Protection of amenity
  - P59 Green infrastructure
  - P60 Biodiversity
  - P61 Trees
  - P62 Reducing waste
  - P64 Contaminated land and hazardous substances
  - P65 Improving air quality
  - P66 Reducing noise pollution and enhancing soundscapes

P67 Reducing water use  
 P68 Reducing flood risk  
 P69 Sustainability standards  
 P70 Energy  
 IP1 Infrastructure  
 IP2 Transport infrastructure  
 IP3 Community infrastructure levy (CIL) and section 106 planning obligations  
 IP6 Monitoring development  
 IP7 Statement of community involvement.

8. The Southwark Plan responds positively to the NPPF, by incorporating area visions, development management policies and site allocations which plan for the long term delivery of housing. It 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.

#### Neighbourhood Plan

9. The South Bank and Waterloo Neighbourhood Plan was published in January 2020 and its area extends to the western side of Blackfriars Road, opposite the site.

#### Supplementary Planning Document and other relevant documents

10. The following Supplementary Planning Documents issued by the council are material considerations:  
 2015 Technical Update to the Residential Design Standards SPD (2011)  
 Design and Access Statements SPD (2007)  
 Heritage SPD (2021)  
 Section 106 Planning Obligations and CIL SPD (2015 and addenda).

#### Greater London Authority Supplementary Guidance

11. The following Supplementary Planning Documents issued by the GLA are material considerations:  
 Accessible London SPG (2014)  
 Air Quality Neutral LPG (2023)  
 Air Quality Positive LPG (2023)  
 Be Seen Energy Monitoring LPG (2021)  
 Character and Context SPG (2014)  
 Circular Economy Statements LPG (2022)  
 Crossrail Funding SPG (2016)  
 Energy Assessment Guidance (2020)  
 Social Infrastructure SPG (2015)  
 Sustainable transport, walking and cycling draft guidance (2022)  
 The control of dust and emissions in construction SPG (2014)  
 Urban Greening Factor LPG (2023)  
 Whole Life Carbon LPG (2022)

### **Emerging material considerations**

Draft GLA guidance

12. To support the London Plan (2021), the GLA has drafted further London Planning Guidance (LPG) on topic areas including:  
Fire Safety draft LPG  
Optimising site capacity: a design-led approach draft LPG.

## APPENDIX 3

## RELEVANT PLANNING HISTORY

Reference and Proposal	Status
<p><b>18/AP/1215</b> Erection of a 10 storey building (40.23m AOD) with basement, comprising a 220 bedroom hotel with ancillary restaurant (Class C1); flexible office space (Class B1); retail units (Class A1/A3); creation of public space; landscaping and associated works. Works to the existing building at ground and roof levels (including a new rooftop terrace, enclosure and PV panels); elevational alteration; creation of a new entrance and the installation of an architectural feature along the Blackfriars Road elevation.</p>	<p>REFUSED 19/12/18</p> <p>Appeal dismissed 14/10/19</p>
<p><b>20/AP/0556</b> Erection of an eight storey building with basement, comprising a hotel (Class C1), flexible commercial or community unit (Class B1/D1), retail floorspace (Class A1/A3), creation of public space, landscaping and associated works. Works to the existing office building at ground and roof levels (including a new rooftop terrace, balustrades and PV panels); elevational alterations; and alterations associated with the creation of a new entrance on the Blackfriars Road elevation.</p>	<p>GRANTED 27/08/2020</p>
<p><b>22/AP/3402</b> Alterations to the facades of the office building with removal of the cladding, introduction of a fire escape door at roof level and upgrading the existing plant equipment (including addition of louvres).</p>	<p>GRANTED 06/02/2023</p>
<p><b>22/AP/3704</b> Installation of 6 no. illuminated fascia signs on the canopy along Blackfriars Road.</p>	<p>GRANTED 20/12/2022</p>
<p><b>23/AP/0381</b> Installation of 2 pergolas at roof level.</p>	<p>Application submitted 10/02/2023</p>

## CONSULTATION UNDERTAKEN

**Site notice date:** 22/09/2022

**Press notice date:** 22/09/2022

**Case officer site visit date:** 22/09/22

**Neighbour consultation letters sent:** 21/09/2022

### Internal services consulted

Design and Conservation Team  
 Transport Policy  
 Environmental Protection  
 Flood Risk Management & Urban Drainage  
 Highways Development and Management  
 Local Economy  
 Community Infrastructure Levy Team

### Statutory and non-statutory organisations

Environment Agency  
 Thames Water  
 Transport for London  
 London Fire & Emergency Planning Authority  
 Metropolitan Police Service (Designing Out Crime)

### Neighbour and local groups consulted:

N7 Peabody Square Blackfriars Road London	8EN
13 Sharpley Court 8A Pocock St London	Flat 7 1 Valentine Row London
11 Windmill Gardens Leicester LE8 0LX	24 Sharpley Court 8A Pocock Street London
28 Pakeman House Pocock St London	Flat 73 Globe View House 29 Pocock Street
Flat 40, Pakeman House London SE1 0BH	Freeths 1 Vine Street London
1 The Priory Webber Street London	Flat 27 Globe View House 171 Blackfriars Road London
2 Murton Court Hillside Road St Albans	11 Tadworth House Webber Street London
Sharpley Court Pocock Street London	Flat 32 Sharpley Court 8A Pocock Street London
9 Sharpley Court 8A Pocock Street London	Flat 23, Sharpley Court 8A Pocock Street LONDON
20 Sharpley Court 8A Pocock Street London	Flat 5 7 Valentine Place London
2 Murton Court St Albans AL13QT	Flat 12 Sharpley Court 8A Pocock Street London
Flat 5, 7 Valentine Place London SE1 8QH	Flat 118 Rowland Hill House Nelson Square
109-115 Blackfriars Rd London SE1 8HW	Flat 12 27 Webber Street London
32 Sharpley Ct 8A Pocock Street London	67 Grosvenor St London W1K 3JN
Flat 7 57 Webber Street London	
154-156 Blackfriars Road London SE1	

Flat 1, 7 Valentine Place London  
 SE18QH  
 Artist Studio Company The Chaplin  
 Centre Taplow Thurlow Street  
 Studio 1 6-8 Cole Street London  
 28 Globe View House 171 Blackfriars  
 Road London  
 Flat 2, 9 Valentine Place London  
 SE18QH  
 Flat 59 Globe View House London  
 Flat 41, Pakeman House, Pocock Street  
 London SE1 0BH  
 53 Globe View House London SE1 0FU  
 Flat 27 Sharpley Court 8A Pocock Street  
 Southwark  
 Flat 21 Globe View House 170  
 Blackfriars Road  
 Flat 37 Globe View House Pocock Street  
 London  
 Flat 29 Globe View House 171  
 Blackfriars Road London  
 Flat 6, Globe View House London SE1  
 8ER  
 6 Brookwood House London SE1 0RJ  
 Flat 29 Globe View House 171  
 Blackfriars Road London  
 13 Valentine Row London SE18BN  
 13 Bazeley House Library Street London  
 Flat 21 59 Webber Street London  
 Flat 26 Globe View House 171  
 Blackfriars Road  
 Flat 52 Globe View House 27 Pocock  
 Street  
 9 Rushworth Street London Southwark  
 Flat 30 Sharpley Court 8A Pocock Street  
 Flat 79 Globe View House 29 Pocock  
 Street  
 Flat 83 Globe View House 29 Pocock  
 Street  
 Flat 11 59 Webber Street London  
 Flat 14 Globe View House 171  
 Blackfriars Road  
 Flat 2 Globe View House 171 Blackfriars  
 Road  
 173B Blackfriars Road London  
 Southwark  
 171A Blackfriars Road London  
 Southwark  
 5 Bell House 57 Webber Street London  
 Suite 200B 154-156 Blackfriars Road  
 London  
 Suite 201 154-156 Blackfriars Road

London  
 Suite 111 154-156 Blackfriars Road  
 London  
 Suite G03 And G04 154-156 Blackfriars  
 Road London  
 Suite G06 154-156 Blackfriars Road  
 London  
 13 The Priory Webber Street London  
 Flat 18 Globe View House 171  
 Blackfriars Road  
 Flat 13 Globe View House 171  
 Blackfriars Road  
 Flat 6 Globe View House 171 Blackfriars  
 Road  
 Flat 49 Globe View House 27 Pocock  
 Street  
 Flat 46 Globe View House 27 Pocock  
 Street  
 Flat 32 Globe View House 171  
 Blackfriars Road  
 Unit 3 160 Blackfriars Road London  
 Apartment 4 10 Rushworth Street  
 London  
 Flat 25 Sharpley Court 8A Pocock Street  
 Flat 22 Sharpley Court 8A Pocock Street  
 North Wing Part Seventh Floor Friars  
 House 160 Blackfriars Road London  
 Flat 39 Colorama House 24 Rushworth  
 Street  
 Flat 29 Colorama House 24 Rushworth  
 Street  
 Flat 11 Colomara House 61 Webber  
 Street  
 Flat 4 Colomara House 61 Webber  
 Street  
 Flat 1 Colomara House 61 Webber  
 Street  
 20 Rushworth Street London Southwark  
 Suite 207 154-156 Blackfriars Road  
 London  
 12 Rushworth Street London Southwark  
 Flat 9 Sharpley Court 8A Pocock Street  
 Flat 16 Globe View House 171  
 Blackfriars Road  
 Flat 68 Globe View House 27 Pocock  
 Street  
 3 The Priory Webber Street London  
 Flat 86 Globe View House 29 Pocock  
 Street  
 Flat 17 Globe View House 171  
 Blackfriars Road  
 Suite G07 154-156 Blackfriars Road



London  
 Flat 29 Sharpley Court 8A Pocock Street  
 156 Blackfriars Road London Southwark  
 Suite G05 154-156 Blackfriars Road  
 London  
 Suite 305 154-156 Blackfriars Road  
 London  
 Suite 303 To 307 154-156 Blackfriars  
 Road London  
 Suite 309 154-156 Blackfriars Road  
 London  
 4 The Priory Webber Street London  
 11 The Priory Webber Street London  
 Flat 10 59 Webber Street London  
 Flat 9 Globe View House 171 Blackfriars  
 Road  
 Flat 77 Globe View House 29 Pocock  
 Street  
 Flat 76 Globe View House 29 Pocock  
 Street  
 Flat 42 Globe View House 27 Pocock  
 Street  
 Flat 29 Globe View House 171  
 Blackfriars Road  
 Unit 2 160 Blackfriars Road London  
 7 Bell House 57 Webber Street London  
 Flat 34 Colorama House 24 Rushworth  
 Street  
 Flat 9 Colomara House 61 Webber  
 Street  
 19 Rushworth Street London Southwark  
 Flat 24 Sharpley Court 8A Pocock Street  
 Flat 4 59 Webber Street London  
 Flat 6 59 Webber Street London  
 Flat 78 Globe View House 29 Pocock  
 Street  
 Flat 70 Globe View House 29 Pocock  
 Street  
 Flat 60 Globe View House 27 Pocock  
 Street  
 Flat 58 Globe View House 27 Pocock  
 Street  
 Flat 20 59 Webber Street London  
 Flat 5 59 Webber Street London  
 Flat 7 Globe View House 171 Blackfriars  
 Road  
 Suite 308 154-156 Blackfriars Road  
 London  
 Suite 113 154-156 Blackfriars Road  
 London  
 Suite 104 154-156 Blackfriars Road  
 London

Suite 210 154-156 Blackfriars Road  
 London  
 Unit 1 160 Blackfriars Road London  
 20 Pocock Street London Southwark  
 169 Blackfriars Road London Southwark  
 Suite 306 154-156 Blackfriars Road  
 London  
 5 The Priory Webber Street London  
 Flat 22 59 Webber Street London  
 Flat 12 59 Webber Street London  
 Retail Unit North 160 Blackfriars Road  
 London  
 Flat 37 Globe View House 27 Pocock  
 Street  
 Flat 22 Globe View House 171  
 Blackfriars Road  
 Flat 21 Globe View House 171  
 Blackfriars Road  
 1 Bell House 57 Webber Street London  
 Apartment 6 10 Rushworth Street  
 London  
 Flat 12 Sharpley Court 8A Pocock Street  
 Flat 11 Sharpley Court 8A Pocock Street  
 Flat 4 Sharpley Court 8A Pocock Street  
 Flat 37 Colorama House 24 Rushworth  
 Street  
 Flat 22 Colorama House 24 Rushworth  
 Street  
 Flat 17 Colomara House 61 Webber  
 Street  
 Flat 13 Colomara House 61 Webber  
 Street  
 Flat 12 Colomara House 61 Webber  
 Street  
 Flat 3 Colomara House 61 Webber  
 Street  
 Suite 108 154-156 Blackfriars Road  
 London  
 Suite 209 154-156 Blackfriars Road  
 London  
 173A Blackfriars Road London  
 Southwark  
 Flat 74 Globe View House 29 Pocock  
 Street  
 Suite 304 154-156 Blackfriars Road  
 London  
 Flat 1 Sharpley Court 8A Pocock Street  
 Flat 19 Globe View House 171  
 Blackfriars Road  
 Flat 43 Globe View House 27 Pocock  
 Street  
 Flat 12 Globe View House 171

Blackfriars Road  
 2 Bell House 57 Webber Street London  
 Apartment 7 10 Rushworth Street  
 London  
 Apartment 2 10 Rushworth Street  
 London  
 6 The Priory Webber Street London  
 Suite 107 154-156 Blackfriars Road  
 London  
 Part Ground And Part First Floor 1  
 Rushworth Street London  
 Flat 36 Sharpley Court 8A Pocock Street  
 Flat 26 Sharpley Court 8A Pocock Street  
 Flat 21 Sharpley Court 8A Pocock Street  
 Flat 16 Sharpley Court 8A Pocock Street  
 Suite 110 154-156 Blackfriars Road  
 London  
 Suite 112 To 133 154-156 Blackfriars  
 Road London  
 Suite 212 154-156 Blackfriars Road  
 London  
 Suite 206 154-156 Blackfriars Road  
 London  
 Suite 105 154-156 Blackfriars Road  
 London  
 Suite 106 154-156 Blackfriars Road  
 London  
 Flat 3 59 Webber Street London  
 Flat 69 Globe View House 27 Pocock  
 Street  
 Flat 27 Globe View House 171  
 Blackfriars Road  
 Apartment 9 10 Rushworth Street  
 London  
 Apartment 8 10 Rushworth Street  
 London  
 Flat 19 Sharpley Court 8A Pocock Street  
 15 The Priory Webber Street London  
 28 Rushworth Street London Southwark  
 Flat 33 Colorama House 24 Rushworth  
 Street  
 Flat 32 Colorama House 24 Rushworth  
 Street  
 Flat 24 Colorama House 24 Rushworth  
 Street  
 Flat 21 Colorama House 24 Rushworth  
 Street  
 Flat 16 Colomara House 61 Webber  
 Street  
 Flat 5 Colomara House 61 Webber  
 Street  
 Flat 8 Globe View House 171 Blackfriars

Road  
 7 The Priory Webber Street London  
 2 Surrey Row London Southwark  
 Apartment 1 10 Rushworth Street  
 London  
 9 The Priory Webber Street London  
 Flat 18 Sharpley Court 8A Pocock Street  
 Flat 75 Globe View House 29 Pocock  
 Street  
 Flat 12B 59 Webber Street London  
 Flat 40 Globe View House 27 Pocock  
 Street  
 Flat 38 Globe View House 27 Pocock  
 Street  
 Flat 23 Globe View House 171  
 Blackfriars Road  
 8 Bell House 57 Webber Street London  
 Suite 102 154-156 Blackfriars Road  
 London  
 Flat 23 Sharpley Court 8A Pocock Street  
 Flat 5 Sharpley Court 8A Pocock Street  
 18 Pocock Street London Southwark  
 1A The Priory Webber Street London  
 Suite 109 154-156 Blackfriars Road  
 London  
 2 The Priory Webber Street London  
 10 The Priory Webber Street London  
 Friars Primary School Webber Street  
 London  
 Flat 19 59 Webber Street London  
 Flat 18 59 Webber Street London  
 Flat 7 59 Webber Street London  
 Unit 4 160 Blackfriars Road London  
 Flat 11 Globe View House 171  
 Blackfriars Road  
 Flat 4 Globe View House 171 Blackfriars  
 Road  
 Flat 67 Globe View House 27 Pocock  
 Street  
 Flat 51 Globe View House 27 Pocock  
 Street  
 Flat 44 Globe View House 27 Pocock  
 Street  
 Flat 15 Sharpley Court 8A Pocock Street  
 Flat 3 Sharpley Court 8A Pocock Street  
 26 Rushworth Street London Southwark  
 Flat 36 Colorama House 24 Rushworth  
 Street  
 Flat 35 Colorama House 24 Rushworth  
 Street  
 Flat 19 Colomara House 61 Webber  
 Street

Flat 14 Colomara House 61 Webber Street  
 Flat 7 Colomara House 61 Webber Street  
 14 - 21 Rushworth Street London Southwark  
 21 Rushworth Street London Southwark  
 Suite 200A 154-156 Blackfriars Road London  
 Flat 2 59 Webber Street London  
 Flat 55 Globe View House 27 Pocock Street  
 Flat 53 Globe View House 27 Pocock Street  
 Madano 160 Blackfriars Road London  
 Flat 50 Globe View House 27 Pocock Street  
 Flat 45 Globe View House 27 Pocock Street  
 Flat 35 Globe View House 27 Pocock Street  
 Flat 28 Globe View House 171 Blackfriars Road  
 Flat 25 Globe View House 171 Blackfriars Road  
 12 The Priory Webber Street London  
 154-156 Blackfriars Road London Southwark  
 Suite 301 154-156 Blackfriars Road London  
 Friars Court Rushworth Street London  
 Flat 31 Sharpley Court 8A Pocock Street  
 Flat 10 Sharpley Court 8A Pocock Street  
 Flat 8 Sharpley Court 8A Pocock Street  
 Suite 103 154-156 Blackfriars Road London  
 Flat 85 Globe View House 29 Pocock Street  
 Flat 71 Globe View House 29 Pocock Street  
 Flat 59 Globe View House 27 Pocock Street  
 Flat 57 Globe View House 27 Pocock Street  
 Flat 39 Globe View House 27 Pocock Street  
 Flat 34 Globe View House 27 Pocock Street  
 6 Bell House 57 Webber Street London  
 Apartment 3 10 Rushworth Street London  
 Flat 33 Sharpley Court 8A Pocock Street

Unit 40 Colorama House 24 Rushworth Street  
 Flat 31 Colorama House 24 Rushworth Street  
 Flat 28 Colorama House 24 Rushworth Street  
 Flat 26 Colorama House 24 Rushworth Street  
 Flat 10 Colomara House 61 Webber Street  
 Flat 6 Colomara House 61 Webber Street  
 Flat 61 Globe View House 27 Pocock Street  
 14 The Priory Webber Street London  
 Flat 33 Globe View House 27 Pocock Street  
 Flat 10 Globe View House 171 Blackfriars Road  
 Flat 34 Sharpley Court 8A Pocock Street  
 Flat 2 Sharpley Court 8A Pocock Street  
 Rushworth And Friars Primary School Webber Street London  
 8 The Priory Webber Street London  
 Flat 9 59 Webber Street London  
 Flat 1 59 Webber Street London  
 Retail Unit South 160 Blackfriars Road London  
 Excluding Part Ground And Part First Floor 1 Rushworth Street London  
 Seventh Floor 160 Blackfriars Road London  
 Flat 15 Globe View House 171 Blackfriars Road  
 Flat 3 Globe View House 171 Blackfriars Road  
 Flat 1 Globe View House 171 Blackfriars Road  
 Flat 84 Globe View House 29 Pocock Street  
 Flat 81 Globe View House 29 Pocock Street  
 Flat 72 Globe View House 29 Pocock Street  
 Flat 66 Globe View House 27 Pocock Street  
 Flat 64 Globe View House 27 Pocock Street  
 Flat 56 Globe View House 27 Pocock Street  
 Flat 47 Globe View House 27 Pocock Street

Flat 24 Globe View House 171  
 Blackfriars Road  
 Basement And Ground Floors Bell  
 House 57 Webber Street  
 Flat 32 Sharpley Court 8A Pocock Street  
 Flat 28 Sharpley Court 8A Pocock Street  
 Flat 27 Sharpley Court 8A Pocock Street  
 Flat 20 Sharpley Court 8A Pocock Street  
 Ro 43 Webber Street London  
 Flat 6 Sharpley Court 8A Pocock Street  
 172 Blackfriars Road London Southwark  
 Flat 23 Colorama House 24 Rushworth  
 Street  
 61A Webber Street London Southwark  
 Flat 38 Colorama House 24 Rushworth  
 Street  
 Flat 30 Colorama House 24 Rushworth  
 Street  
 Flat 18 Colomara House 61 Webber  
 Street  
 Flat 15 Colomara House 61 Webber  
 Street  
 Flat 8 Colomara House 61 Webber  
 Street  
 Flat 2 Colomara House 61 Webber  
 Street  
 4 Bell House 57 Webber Street London  
 Flat 41 Globe View House 27 Pocock  
 Street  
 Suite 208 154-156 Blackfriars Road  
 London  
 Flat 80 Globe View House 29 Pocock  
 Street  
 Flat 65 Globe View House 27 Pocock  
 Street  
 Flat 63 Globe View House 27 Pocock  
 Street  
 Flat 17 59 Webber Street London  
 Flat 8 59 Webber Street London  
 Flat 48 Globe View House 27 Pocock  
 Street  
 Flat 30 Globe View House 171  
 Blackfriars Road  
 Flat 20 Globe View House 171  
 Blackfriars Road  
 Flat 5 Globe View House 171 Blackfriars

Road  
 Manna House 8-20 Pocock Street  
 London  
 Suite 203 And 204 154-156 Blackfriars  
 Road London  
 Apartment 5 10 Rushworth Street  
 London  
 Suite 101 154-156 Blackfriars Road  
 London  
 Flat 13 Sharpley Court 8A Pocock Street  
 Suite 311 154-156 Blackfriars Road  
 London  
 Suite G02 154-156 Blackfriars Road  
 London  
 Suite 213 154-156 Blackfriars Road  
 London  
 43 Webber Street London Southwark  
 Flat 16 59 Webber Street London  
 Flat 15 59 Webber Street London  
 Flat 12A 59 Webber Street London  
 Flat 82 Globe View House 29 Pocock  
 Street  
 Flat 62 Globe View House 27 Pocock  
 Street  
 Flat 54 Globe View House 27 Pocock  
 Street  
 Flat 36 Globe View House 27 Pocock  
 Street  
 Flat 31 Globe View House 171  
 Blackfriars Road  
 3 Bell House 57 Webber Street London  
 Flat 35 Sharpley Court 8A Pocock Street  
 Flat 17 Sharpley Court 8A Pocock Street  
 Flat 14 Sharpley Court 8A Pocock Street  
 Flat 7 Sharpley Court 8A Pocock Street  
 Flat 14 59 Webber Street London  
 Flat 27 Colorama House 24 Rushworth  
 Street  
 Flat 25 Colorama House 24 Rushworth  
 Street  
 Flat 20 Colomara House 61 Webber  
 Street

**Re-consultation:** n/a

**APPENDIX 5****CONSULTATION RESPONSES RECEIVED****Internal services**

Transport Policy  
 Environmental Protection  
 Flood Risk Management & Urban Drainage  
 Highways Development and Management  
 Local Economy  
 Community Infrastructure Levy Team

**Statutory and non-statutory organisations**

Environment Agency  
 Thames Water  
 Transport for London  
 Metropolitan Police Service (Designing Out Crime)

**Neighbour and local groups consulted:**

Flat 32 Sharpley Court LONDON SE1  
 OBJ  
 13 Sharpley Court 8a Pocock St London  
 11 Tadworth House Webber Street SE1  
 ORH  
 9 Globe View House 171 Blackfriars  
 Road London  
 11 Windmill Gardens Kibworth Harcourt  
 LE8 0LX  
 28 Globe View House 171 Blackfriars  
 Road London  
 Flat 5 7 Valentine Place London  
 Flat 23 Sharpley Court 8A Pocock Stree

<b>OPEN</b>		<b>MUNICIPAL YEAR 2022-23</b>	
<b>COMMITTEE:</b>	<b>PLANNING COMMITTEE</b>		
<b>NOTE:</b>	Original held in Constitutional Team; all amendments/queries to Gerald Gohler, Constitutional Team, Tel: 020 7525 7420		
<b>OPEN</b>			
<b>COPIES</b>		<b>COPIES</b>	
<b>MEMBERS</b>		<b>PLANNING TEAM</b>	
Councillor Richard Livingstone (Chair)	1	Colin Wilson / Stephen Platts	1
Councillor Kath Whittam (Vice-Chair)	1		
Councillor Ellie Cumbo	1		
Councillor Richard Leeming	1		
Councillor Reggie Popoola	1		
Councillor Bethan Roberts	1		
Councillor Cleo Soanes	1		
<b>Electronic Copies (No paper)</b>		<b>COMMUNICATIONS TEAM (Electronic)</b>	
Councillor Nick Johnson		Louise Neilan	
		<b>LEGAL TEAM</b>	
Councillor Sam Foster (reserve)		Nagla Stevens	1
Councillor Jon Hartley (reserve)			
Councillor Sarah King (reserve)			
Councillor Sunny Lambe (reserve)		<b>CONSTITUTIONAL TEAM</b>	
Councillor Margy Newens (reserve)		Gerald Gohler	3
Councillor Sandra Rhule (reserve)			
Councillor Michael Situ (reserve)			
Councillor Emily Tester (reserve)		<b>TOTAL PRINT RUN</b>	12
<b>MEMBER OF PARLIAMENT (Electronic)</b>			
Helen Hayes MP, House of Commons, London, SW1A 0AA			
List Updated: 27 February 2023			