

## Planning Committee

Monday 24 April 2023

6.30 pm

Ground Floor Meeting Room G02ABC - 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

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### 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.

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#### Contact

Gregory Weaver on 020 7525 3667 or email: [greg.weaver@southwark.gov.uk](mailto:greg.weaver@southwark.gov.uk)

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Members of the committee are summoned to attend this meeting

**Althea Loderick**

Chief Executive

Date: 14 April 2023



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# Planning Committee

Monday 24 April 2023

6.30 pm

Ground Floor Meeting Room G02ABC - 160 Tooley Street, London SE1 2QH

## Order of Business

Item No.	Title	Page No.
	<b>PROCEDURE NOTE</b>	
1.	<b>APOLOGIES</b>	
	To receive any apologies for absence.	
2.	<b>CONFIRMATION OF VOTING MEMBERS</b>	
	A representative of each political group will confirm the voting members of the committee.	
3.	<b>NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT</b>	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	<b>DISCLOSURE OF INTERESTS AND DISPENSATIONS</b>	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	<b>S106 - 22/AP/0485 - 87 NEWINGTON CAUSEWAY, LONDON, SOUTHWARK, SE1 6BD</b>	3 - 14
6.	<b>DEVELOPMENT MANAGEMENT</b>	15 - 19
6.1.	<b>19/AP/0404 - 40-44 BERMONDSEY STREET, VINEGAR YAR WAREHOUSE; 9-17 VINEGAR YARD AND LAND ADJACENT TO 1-7 SNOWFIELDS SE1</b>	20 - 177

<b>Item No.</b>	<b>Title</b>	<b>Page No.</b>
<b>6.2.</b>	<b>22/AP/1068 - 5-9 ROCKINGHAM STREET AND 2-4 TIVERTON STREET, LONDON, SE1 6PF</b>	178 - 406

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

**EXCLUSION OF PRESS AND PUBLIC**

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

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

Date: 14 April 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.

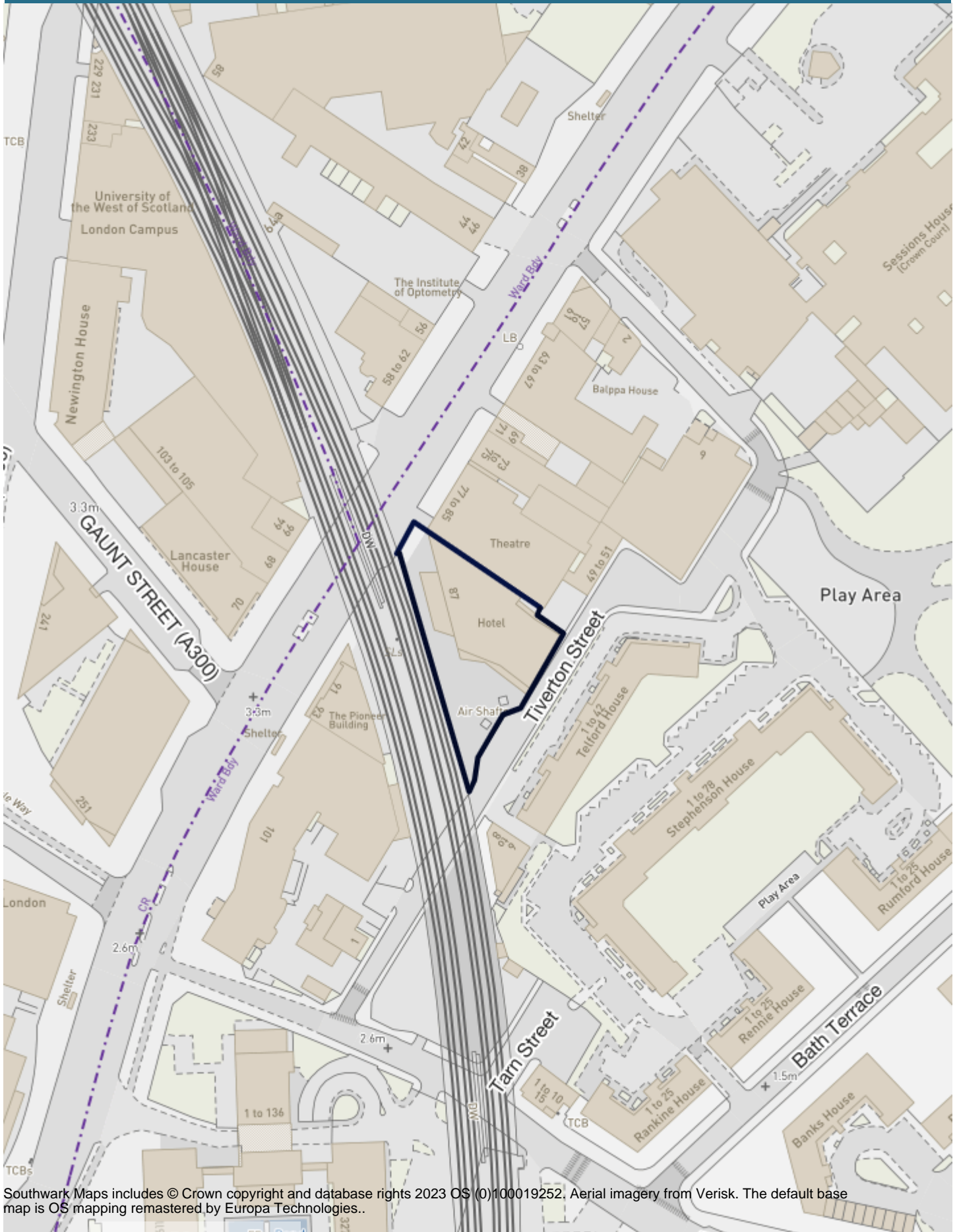
**Please note:**

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  
Environment, Neighbourhoods and Growth  
Tel: 020 7525 5403

Planning Committee Clerk, Constitutional Team  
Governance and Assurance  
Tel: 020 7525 5485/7420



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<b>Item No.</b>	<b>Classification:</b>	<b>Date:</b>	<b>Meeting Name:</b>
4.1	OPEN	24 April 2023	Planning Committee
<b>Report title:</b>	<p><b>Development Management planning application:</b> Application 22/AP/0485 for: Variation of Legal Agreement</p> <p><b>Address: 87 Newington Causeway London Southwark SE1 6BD</b></p> <p><b>Proposal:</b> Variation of the Section 106 Agreement relating to planning permission 16/AP/3144 [dated 29.01.2018] for: "Redevelopment of the site for a mixed use development comprising a basement/mezzanine basement, ground plus twenty-three floors to accommodate a 140 room hotel (levels 1-11), 48 residential units (levels 12-24), a retail unit (at ground floor), associated cycle parking, servicing and refuse and recycling, landscaping and private and communal residential amenity space (including at roof top level), external refurbishment to the front of the railway arches, and a new pedestrian route through the site linking Newington Causeway with Tiverton Street".</p> <p>The variation would secure a financial payment in lieu of the delivery of the 16 affordable housing units on site.</p>		
<b>Ward(s) or groups affected:</b>	Chaucer		
<b>From:</b>	Director of Planning and Growth		
<b>Application Start Date</b>	<b>18 February</b>	<b>PPA Expiry Date</b>	
<b>2022</b>			
<b>Earliest Decision Date</b>			

## RECOMMENDATION

1. That the variation of the Section 106 agreement be agreed.

## EXECUTIVE SUMMARY

2. The developer has completed the development, which was approved by the planning committee in 2017. The legal agreement required them to provide 16 affordable homes on site, eight social rent and eight intermediate. The developer has not been able to find a Registered Provider (RP) to purchase these affordable homes so is proposing a financial payment of £5.95m in lieu of the delivery of these affordable homes on site.
3. Policy requires that there be no financial incentive for developers to provide a financial payment for affordable housing. This application has been subject to financial viability assessments, both from the applicant's and the council's consultants. Both show that, on current market conditions, the additional value



for the 16 homes in changing the tenure from affordable to market homes would be lower than the figure proposed by the applicant. The amount of the affordable housing contribution of £5.95m is consistent with P1 of the New Southwark Plan which requires that there should be no financial benefit to the applicant.

## **BACKGROUND INFORMATION**

4. The s106 agreement of the original planning permission, reference 16/AP/3144, was signed in January 2018 and secured the construction of 16 affordable homes of which eight were to be social rent and eight intermediate, equalling 56 habitable rooms.
5. The applicant sought interest from 25 RPs and the council to purchase these homes but all have declined.

### **Details of proposal**

6. It is proposed to replace the 16 on-site affordable homes in the approved scheme with a payment in lieu of affordable housing and to vary the obligations in the legal agreement regarding the affordable housing on site to a financial payment of £5.95m. This would be used for the delivery of affordable housing by the council in the borough. The specific clauses that would be amended are:

Schedule 2- Affordable Housing

Schedule 3- Viability

Schedule 4- Shared Ownership Units

Schedule 5- Shared Ownership and Remaining Wheelchair Housing Units

Schedule 6- Financial Contributions

7. The addition of a new definition of Off-site Affordable Housing Contribution as follows:  
 "Means the sum of to be paid by the Developer in accordance with hereof and to be applied by the Council towards the provision of off-site affordable housing within the London Borough of Southwark and which shall be subject to indexation...". The indexation would apply from the date the deed of variation is signed.

### **Planning history of the site**

8. The planning history is in appendix 1.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

9. In determining this application, there are two main issues to consider. These are whether the submitted details are:

(a) acceptable in terms of policy, and

(b) Sufficient to amend the terms of the legal obligation and the reason for the imposition of the obligation.

10. These matters are discussed in detail in the 'Assessment' section of this report.
11. The detailed planning policy relating to this development is set out in the report on the original planning application. Any specific policy considerations relating to the submitted details are set out below.
12. Community impact, equalities and human rights implications are relevant considerations, as is working proactively and positively with applicants and agents. These matters are discussed in the 'Assessment' section of this report.

## **ASSESSMENT**

### **Assessment of the proposed changes**

13. The original purpose of the relevant parts of the Section 106 Agreement subject to this application for a variation was to secure affordable housing on site.
14. The draft Affordable Housing Supplementary Planning Document 2011 sets out the sequential test approach. This is followed to make sure that the council secures as much affordable housing as possible. The sequential approach is as follows:
  1. All housing, including affordable housing should be located on the development site.
  2. In exceptional circumstances we may allow the affordable housing to be provided off-site. In these circumstances we require that affordable housing is provided on another site or sites in the local area of the proposed development.
  3. In exceptional circumstances we may allow a pooled contribution in lieu of on-site or off- site affordable housing. In these circumstances we require a payment towards providing affordable housing instead of the affordable housing being built as part of the proposed development.'
15. Planning permission 16/AP/3144 secured affordable housing on the development site in keeping with point 1 of the sequential approach and the applicant has built it on site. The applicant does not have any other sites within the borough to provide the affordable housing on another site in accordance with point 2 above.
16. Point 3 of the sequential approach and Policy P1 of the Southwark Plan also allows payment in lieu in exceptional circumstances. The applicant was not able to find a Registered Provider (as defined in the Section 106 Agreement) willing to deliver the affordable housing as contemplated by the Section 106 Agreement. The reasons given include:
  - Number of dwellings being too small for RPs

- A reduced appetite for s106 purchases
  - The location not being a priority for RPs
  - The height at 24 storeys being against RP strategies
  - Income caps on the shared ownership
  - Service charges
17. The development is not typical of the majority of s106 affordable housing schemes in that the housing is located above a hotel use. As the applicant points out this creates challenges in terms of the location of the affordable element at the top of the building and this also has an impact on service charges. The majority of s106 housing offers tend to be in development that are predominantly or exclusively residential with the affordable element usually on the lower floors. P1 of the Southwark Plan 2022 says that where development cannot provide social rented or intermediate housing on site there should be no financial benefit to the applicant. A financial appraisal was provided by the applicant's consultant, Savills dated June 2022. This appraisal was based on actual construction costs for the development and looked at the additional value that would be provided through the housing being delivered as 100% market housing. At that time this would have delivered a surplus of £6.1m for the payment in lieu. This assessment also included the cost of re paying the CIL relief claimed of £392k.
  18. The applicant's viability appraisal was reviewed by the council's consultant, Avison Young who concluded that surplus of £7.16m would be the result but this was without re-payment of CIL for the relief claimed by the applicant. The main difference in their assessment was the valuations for the three bedroom dwellings which AY initially considered to be higher in the market.
  19. Following the submission of the Avison Young report, the applicant identified that that the CIL relief that was legitimately claimed on the 16 affordable homes would need to be paid back which would add £545k to the costs, higher than that initially identified. There was also further discussion of the values for the dwellings in the current market, in particular the three bedroom dwellings.
  20. A further financial review was undertaken by Savills in March 2023 which took into account the repayment of the CIL relief but also the market adjustment in September 2022 following the national budget which significantly affected the housing market. Their revised assessment concluded that the surplus would be £5.79m instead of the £6.1 initially suggested, reduced mostly because of the market changes and the higher CIL payment that would be due.
  21. Avison Young reviewed this latest assessment and identified that the legal agreement allowed for a higher income threshold for the shared ownership affordable of up to £90k. Using the input Savills suggested with the higher value for the shared ownership, Avison Young's assessment is that the surplus would be £5.386m. The inputs Avison Young have used generates a surplus of £5.560m. Both outcomes are below the offer from the applicant of £5.95m which the applicant has maintained and officers recommend that this offer is accepted.
  22. A similar application for a development to provide a financial contribution instead of on-site delivery was approved by members of planning sub-committee A in January 2023 (application reference 21/AP/4229). The site is on Gilkes Crescent where four affordable homes were secured in the legal agreement consisting of

16 habitable rooms. The payment in that case, using the same methodology was £1,991,470 which is £124k per habitable room, compared to £101k for this application (based on 59 habitable rooms which is what 35% of the total would be). An off site in lieu payment was also agreed by planning committee in early 2022 at Rotherhithe Old Road under a different methodology (that predated the adoption of the 2022 Southwark Plan) that secured a payment of approximately £80k per habitable room. However the circumstances of each case in terms of the mix and disposition of uses on each site, the height of buildings and the relative values of the units all need to be considered on their own merits. In this instance and as set out above the Council's own independent advice is that the applicant is offering a payment that is above the surplus that we estimate would be generated by converting the affordable homes to private sale.

23. The Elim Estate proposal is an example of how this financial payment might be utilised in reviving stalled developments within the council's new homes programme. This development would provide 32 new homes in Chaucer Ward, all for social rent, delivered for the council by the Leathermarket JMB.



24. It is likely that finding would be allocated on eligible sites on a cascaded basis:
- First priority- Chaucer Ward
  - Second Priority- Elephant and Castle Opportunity Area
  - Third priority- Southwark

## Consultations

25. Details of consultation and any re-consultation undertaken in respect of this application are set out in the appendix 2.

## Summary of consultation responses

26. None.

## Community impact and equalities assessment

27. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
28. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
29. 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.
30. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. The lack of provision of affordable housing has a disproportionate impact on individuals from BAME backgrounds. Whilst council policy prioritises on site provision, in circumstances such as these where it has no proved possible to achieve that, the provision of the maximum viable in lieu payments is acceptable. The payment will help to fund the delivery Councils own housing programme.
31. The legal agreement would be varied by adding clauses to require the applicant to provide a financial payment instead of affordable housing on site. This would comply with the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) Supplementary Planning Document. Lack of access to affordable housing disproportionately affects people from ethnic minorities communities and the money would be used to provide council homes in the borough. At present whilst the units have been built the lack of an RP willing to purchase the units means that they make no contribution to the need for affordable housing in te borough. The in lieu payment would offer a means for the council to deliver its own council housing programme as set out earlier in this report.

## Human rights implications

32. 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.
33. This application has the legitimate aim of extending and refurbishing an existing office building. 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

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

## Positive and proactive engagement: summary table

Was the pre-application service used for this application?	NO
If the pre-application service was used for this application, was the advice given followed?	N/A
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?	N/A
To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date?	YES

## CONCLUSION

Given the particular circumstances of this site, with a mix of hotel and housing uses in a tall building, and the difficulty of securing a Housing Association to take on the affordable homes, an in lieu payment is considered the most appropriate way of securing affordable housing delivery. In particular the delivery of the councils house building programme within the Chaucer ward.

## BACKGROUND INFORMATION

### BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Application file 22/AP/0485 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 1778 Council website: www.southwark.gov.uk

## APPENDICES

No.	Title
Appendix 1	Planning history of the site
Appendix 2	Consultation undertaken – Press Notice 10 March 2022

## AUDIT TRAIL

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth	
<b>Report Author</b>	Dipesh Patel,	
<b>Version</b>	Final	
<b>Dated</b>	14 April 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 of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>	14 April 2023	

## Appendix 1: Relevant planning history of the site

Reference and Proposal	Status
<p><b>16/AP/3144</b>  Redevelopment of the site for a mixed use development comprising a basement/mezzanine basement, ground plus twenty-three floors to accommodate a 140 room hotel (levels 1-11), 48 residential units (levels 12-24), a retail unit (at ground floor), associated cycle parking, servicing and refuse and recycling, landscaping and private and communal residential amenity space (including at roof top level), external refurbishment to the front of the railway arches, and a new pedestrian route through the site linking Newington Causeway with Tiverton Street</p>	<p>Granted with  Legal  Agreement  29/01/2018</p>



## **Appendix 2: Consultation undertaken**

**Site notice date:**

**Press notice date:** 10/03/2022

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

**Neighbour consultation letters sent:**

**Internal services consulted**

**Statutory and non-statutory organisations**

**Neighbour and local groups consulted:**

**Re-consultation:**

<b>Item No.</b> 6.	<b>Classification:</b> Open	<b>Date:</b> 24 April 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**

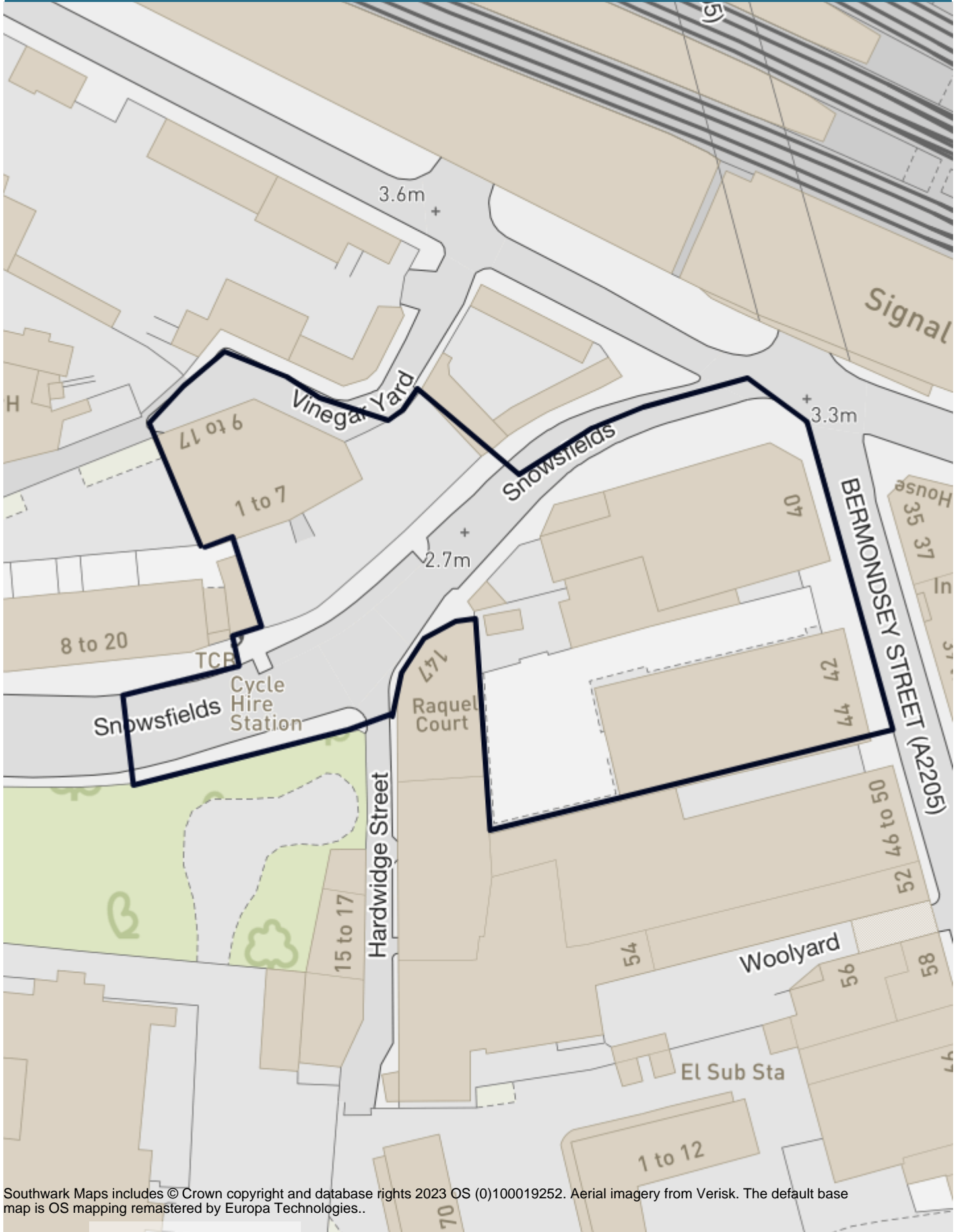
<b>Lead Officer</b>	Chidilim Agada, Head of Constitutional Services	
<b>Report Author</b>	Gerald Gohler, Constitutional Officer Nagla Stevens, Deputy Head of Law (Planning and Development)	
<b>Version</b>	Final	
<b>Dated</b>	14 April 2023	
<b>Key Decision?</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / 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>		14 April 2023

# Agenda Item 6.1



19/AP/0404

40-44 Bermondsey Street, Vinegar Yard Warehouse 9-17 Vinegar Yard and Land Adjacent To 1-7 Snowsfields, London, SE1



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<b>Item No.</b>	<b>Classification:</b>	<b>Date:</b>	<b>Meeting Name:</b>
6.1	OPEN	24 April 2023	Planning Committee
<b>Report title:</b>	<p><b>Development Management planning application:</b> Application 19/AP/0404 for: Full Planning Application</p> <p><b>Address:</b> 40-44 BERMONDSEY STREET VINEGAR YARD WAREHOUSE 9-17 VINEGAR YARD AND LAND ADJACENT TO 1-7 SNOWFIELDS SE1.</p> <p><b>Proposal:</b> Refurbishment and extension of existing Vinegar Yard Warehouse (equivalent of 7 storeys and 26.188m AOD), demolition of 42-44 Bermondsey Street and retention and extension of 40 Bermondsey Street to form two buildings (equivalent of 12 storeys and 50.425m AOD) to provide office space (Class E); retail space (Class E); new landscaping and public realm including a new pedestrianised route through the site; vehicular access; associated works to public highway; ancillary servicing; plant; storage and associated works.</p>		
<b>Ward(s) or groups affected:</b>	London Bridge and West Bermondsey		
<b>From:</b>	Director of Planning and Growth		
<b>Application Start Date</b>	08/03/2019	<b>PPA Expiry Date</b>	31 October 2023
<b>Earliest Decision Date</b>			

## RECOMMENDATION

1. That planning permission is GRANTED subject to conditions, referral to the Mayor of London and the applicant entering into an appropriate legal agreement; and
2. That environmental information be taken into account as required by Regulation 26(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended); and
3. That the Planning Committee in making their decision has due regard to the potential Equalities impacts that are outlined in this report; and
4. That following the issue of planning permission, the Director of Planning and Growth write to the Secretary of State notifying them of the Decision, pursuant to Regulation 30(1)(a) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017; and
5. That following issue of planning permission, the Director of Planning and Growth place a statement on the Statutory Register pursuant to Regulation 28(1) of the

TCP (EIA) Regulations 2017, which contains the information required by Regulation 28 and, for the purposes of Regulation 28(1)(h) being the main reasons and considerations on which the Planning Committee's decision was based shall be set out in the report; and

6. That, in the event that the requirements of (1) are not met by 31<sup>st</sup> October 2023 that the Director of Planning and Growth be authorised to refuse planning permission, if appropriate, for the reasons set out in Paragraph 317 of this report

## **EXECUTIVE SUMMARY**

7. When originally submitted in February 2019, the application sought detailed planning permission for:
  4. Demolition of existing buildings at 40-44 Bermondsey Street including partial demolition, rebuilding and refurbishment of existing Vinegar Yard Warehouse and erection of three new buildings (two linked) with up to two levels of basement and heights ranging from five storeys (24.2m AOD) to 17 storeys (67m AOD) to provide office space (Class B1); flexible retail space (Classes A1/A2/A3/A4/A5); new landscaping and public realm; reconfigured pedestrian and vehicular access; associated works to public highway; ancillary servicing; plant; storage and associated works.
  8. This application sought the full demolition of the Bermondsey Street buildings and replacement with two linked mixed use office and retail buildings rising to a total height of 10 storeys and 44.05m (AOD). The Vinegar Yard Warehouse would have been retained and extended vertically by 13 storeys to bring the total height to 17 storeys and 67m (AOD).
  9. The originally proposed development was recommended for approval by officers and it was intended that this would be presented to Planning Committee on the 29 June 2020 however members resolved to defer a decision on the application so that amendments could be considered to address the significant local concerns. The required amendments were summarised as:
    - Reduction in the height of the extension to the Vinegar Yard Warehouse with no development or massing taking place directly above the existing building.
    - Change to the materiality of the Bermondsey Street Building principally removing the proposal to use glass bricks and instead focussing on masonry to be more contextual with the surrounding buildings.
    - Realignment of the new route from Bermondsey Street to Snowfields to take the form of a traditional yard.
  10. Subsequent to the deferral, the applicant has appointed a new design team and the scheme has been fully revised. Taking into account the comments made on deferral of the application, the scheme amendments include:
    11.
      - Removal of the vertical extension to the Vinegar Yard Warehouse in lieu of a six storey side extension as well as retention and refurbishment of the warehouse. The proposed extension would be a total height of 26.188m and would represent a reduction in height from the previous proposal of

40.8m

- Redesign of the Bermondsey Street buildings, including retention and reuse of No. 40 Bermondsey Street as well as recessive upward extensions to bring the building to 11 storeys and a maximum height of 50.425m (AOD). This would retain the masonry brick structure and façade of the Bermondsey Street building.
- Realignment of the proposed new route from Bermondsey Street to Snowsfields from a diagonal route to a perpendicular/dog leg route.

12. The development has been significantly reduced in scale and quantum. The table below demonstrates the changes to the scale and quantum of development.

Proposed Use	Original Scheme	Revised Proposals
Class B /Class E Office	21,522sqm	15,716sqm
Class A1-4/Class E Retail	1,281sqm	351sqm
Total	22,803sqm	16,067sqm
Building Heights	Original Scheme	Revised Proposals
Bermondsey Street Building	5/10 storeys + basement	5/11 storeys + basement
Vinegar Yard Warehouse Extension	17 storeys + basement	6 storeys + basement

13. The proposal would continue to be for a large commercial development comprising mainly office with some ancillary retail use at ground floor level across two buildings, a retained/refurbished and extended Vinegar Yard Warehouse and a new building on Bermondsey Street that retains No. 40 Bermondsey Street. At 11 commercial storeys, the Bermondsey Street building would be classed as a tall building.
14. The proposed development would be a constituent part of a wider development framework that covers the eastern St Thomas Street area running from Weston Street to Bermondsey Street and includes the neighbouring sites known as Capital House; Becket House; and Vinegar Yard. The sites' landowners have sought to coordinate an approach for comprehensive redevelopment and have established a framework for developing the area.
15. The framework envisages a series of individual buildings that reinforce the street edges of Weston Street, St Thomas Street and Snowsfields and define a public garden to the rear towards Melior Street and a new public plaza towards Snowsfields. It retains north-south routes across the site and sought a new east-west pedestrian route that bisects the framework area, linking Weston Street with the two new public spaces and through to Bermondsey Street. The application site is only partially located within a conservation area (Vinegar Yard Warehouse) and does not contain any listed buildings. The Bermondsey Street conservation area sits to the south and the east of the Bermondsey Street site.
16. The development would retain and fully refurbish the Vinegar yard Warehouse, an important local building that has a historic character and is considered to be a local heritage asset that contributes positively to the Bermondsey Street Conservation Area.
17. As with all buildings of this scale within Central London, the design is required to

be of the highest standards and this has been achieved as part of the revised proposals. The proposed office accommodation would be of a high standard and would meet the needs of modern office users. The development would include 10% of the office floorspace as affordable workspace which would meet the demands of micro to medium sized businesses as well as start-ups and enterprises looking to expand.

18. The development would be highly energy efficient and sustainable with an on-site carbon reduction of 54% above the 2013 Building Regulations in addition to a carbon offset payment that would help the development achieve Carbon Zero targets. It is expected that the development would achieve BREEAM 'Excellent' and this would be a conditioned requirement of any consent.
19. The site is located in the Central Activities Zone, the Bankside Borough and London Bridge Opportunity Area and partially within the London Bridge District Town Centre and site allocation NSP54 of the Southwark Plan 2022. The proposals are consistent with the site allocation and the objectives of the development plan for this area.
20. The impact on the amenity of neighbours in terms of daylight and sunlight is set out in the report, and it is noted that the daylight/sunlight impacts on a small number of residential properties closest to the site are significant, being categorised as moderate effects in the Addendum ES. These impacts should be considered in the context of the character of the area in line with the flexibility expected by the BRE when looking at dense urban environments. These impacts also need to be balanced against the significant benefits of delivering this scheme.

Use Class	Existing sqm	Proposed sqm	Change +/-
Use Class E (a) to (f) retail/financial services	0	351	+351
Use Class E (g) i) Office	2,015	15,716	+13,701
Affordable workspace Use Class E	0	1,572	+1,572
Sui Generis	460	0	-460
Construction Jobs		592 per annum	
Operational Jobs		915	

CO2 Savings beyond part L Bldg. Regs.	Bermondsey Street – 52% improvement Vinegar Yard Warehouse – 63% improvement Combined – 54%
Trees lost	5
Trees gained	21

	Existing	Proposed	Change +/-
Urban Greening Factor	n/a	0.36	n/a

Public open space	158m2 (this is pavement to the edge BY building)	331m2	173m3
Greenfield Run Off Rate	1.22l/s	1.22l/s	0
Green/Brown Roofs	0	1,677m2	+ 1,677m2
EVCPS (on site)		1	
Cycle parking spaces		354 long stay 71 short stay	

CIL (estimated)	£148,583.41
MCIL (estimated)	£772,801.57
S106	

21. A total of 1,371 letters were sent to local residents as part of a neighbour notification exercise on the revised proposals and this was initially undertaken on 11 October 2022 and repeated on 24 November 2022 following concerns that some neighbours had not received their initial letter. Following the submission of summary information, re-consultation was undertaken again on 27 January 2023 and further repeated again on the 22 March 2023. Taking together the consultation responses on the original submission and the revised proposals, a total of 272 objections have been received as well as 23 representations of support. The main points of the objections are set out below along with the number of times they have been raised.

22.

Objection topic	Number of time raised	
	Original submission	Revised proposals
Heritage and conservation area impacts	75	39
Height/scale/massing	52	71
Out of character with the area	37	63
Daylight/sunlight/overshadowing	30	27
Wind	27	8
Disruption during and after construction	26	9
Transport and traffic impacts	20	12
Insufficient benefits/no justification	16	5
Overdevelopment	15	14
Noise	14	6
Detailed design	12	19
Overbearing	12	8
Views	11	14
Consultation	10	14
Privacy	10	15
Public realm	6	6
Cumulative impacts	5	0
Air quality	4	3
Trees and landscaping	4	3
Ecology	-	1
Infrastructure/local services	-	4

## BACKGROUND INFORMATION

## Site location and description

23. The application site relates to two plots of land divided by Snowfields. The plot to the west of Snowfields is known as the Snowfields site and the plot to the east is known as the Bermondsey Street site. The comprehensive application site (the site) lies to the south of London Bridge Station close to the junction of St Thomas Street, Snowfields, Bermondsey Street and Crucifix Lane.
24. The Snowfields site is bounded by Snowfields on the south/east and Vinegar Yard to the north/west. The site is currently occupied by the building known as the Vinegar Yard warehouse which extends to four storeys in height with an additional semi basement level. The warehouse is currently vacant due to its poor state of repair and various structural issues. The remainder of the plot consists of hard standing. Adjacent to the warehouse to the west is the Horseshoe Inn and to the south is a four storey building with a bar/restaurant on the ground floor and homes on the upper levels. To the north of the site, on the opposite side of Vinegar Yard, is a larger cleared site which is currently in temporary use as a market and food/beverage outlet. There is a cycle hire docking station with capacity for 31 cycles adjacent to the site on Snowfields. Buildings in the immediate vicinity of the Snowfields site range in height from three to six storeys.

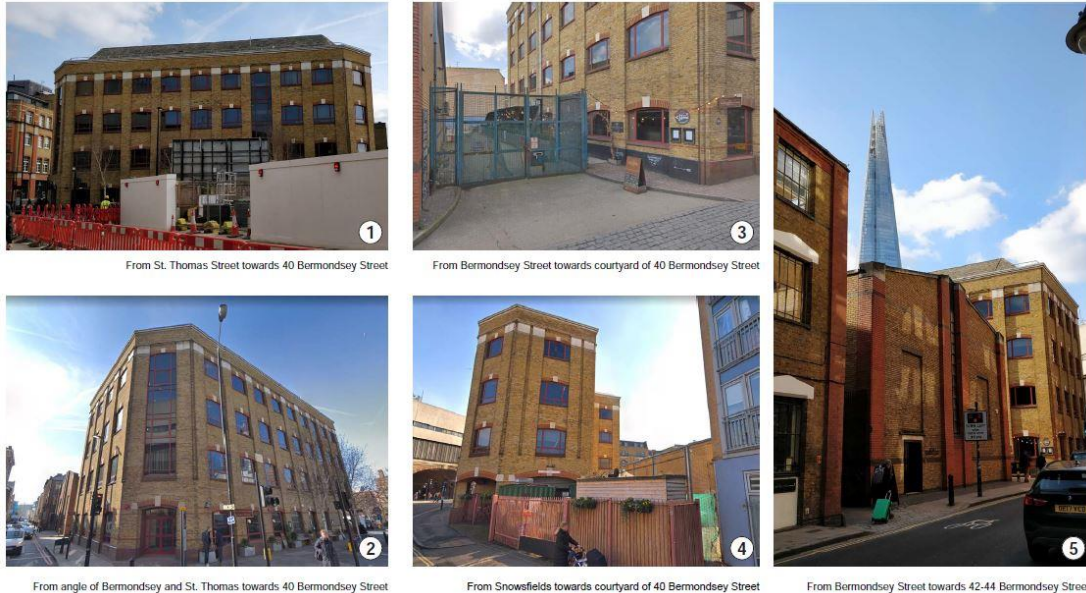
### Image – Location Plan



25. The Bermondsey Street site is bounded by Bermondsey Street to the east, the junction of Bermondsey Street/St Thomas Street and Crucifix Lane to the north and Snowfields to the west. The Bermondsey Street site is currently occupied by two buildings and a large yard area. The building at the south end of the plot is a warehouse building comprising offices whilst the building to the north is a four storey building with retail at ground floor level and offices on the upper levels. The Bermondsey Street site is adjacent to existing residential buildings to the west at Raquel Court and Hardwidge Street whilst Bermondsey Street to the east

accommodates a range of uses including retail, cultural space, offices, and residential. The Wine and Spirit Education Trust is located adjacent to the site on Bermondsey Street. Buildings in the immediate vicinity of the Bermondsey Street site range in height from four to six storeys.

Image – Existing buildings Bermondsey Street



26. The Bermondsey Street site lies adjacent to the Bermondsey Street Conservation Area on its south and east boundaries. On the Snowsfields Site, the part of the plot occupied by the Vinegar Warehouse sits within the Bermondsey Street Conservation Area which recognises the heritage value of both the Vinegar Warehouse and the Horseshoe Inn which are classed as undesignated heritage assets.
27. The surrounding area is characterised by a range of uses including retail, office, cultural, education and residential. The northern end of Bermondsey Street is dominated by the London Bridge Station railway viaduct, the arches of which have been redeveloped into new retail outlets as part of the station refurbishment.
28. In terms of accessibility, the application site benefits from the highest level of public transport accessibility with a PTAL rating of 6B reflecting the proximity of London Bridge Railway Station and associated Jubilee and Northern lines of the London Underground. Bus routes are available to the north of the site on Tooley Street and west on Borough High Street.

### Image – Existing Vinegar Yard Warehouse



From Snowfields towards the Leather Warehouse



From Vinegar Yard towards the Leather Warehouse



From Hardwidge Street towards the Leather Warehouse



From Mellor Street towards the Leather Warehouse

### Details of proposal

29. Planning consent is sought for the refurbishment and extension of existing Vinegar Yard Warehouse, demolition of 42-44 Bermondsey Street and retention and extension of 40 Bermondsey Street to form two buildings with up to two levels of basement and heights ranging from six storeys (AOD 26.188) at the Vinegar Yard Warehouse to eleven storeys (AOD 50.425) on the Bermondsey Street buildings in order to provide office space (Class E); retail space (Class E); new landscaping and public realm including new pedestrianised route through the site; vehicular access; associated works to public highway; ancillary servicing; plant; storage and associated works.
30. The development would be formed of two buildings. The Bermondsey Street Building and the Vinegar Yard Warehouse with its proposed extension. Snowfields would separate the two constituent parts of the site.
31. The Bermondsey Street building would involve the demolition of 42-44 Bermondsey Street and the retention of 40 Bermondsey Street. This would be supplemented by a stepped extension taking the building to a total of 11 storeys in height (50.425m AOD). The Bermondsey Street building would provide 12,922sqm of office (Class E) floorspace and 351sqm of retail/restaurant (Class E) floorspace.



32. The building would incorporate part retail use and an office reception at ground floor, with office use on all upper levels. Office amenity terraces would be provided on levels 4, 6, 8, 10, and 11. A new public pedestrian route that reinstates the historic street pattern would be provided through the site at ground level from Bermondsey Street to Snowsfields.
33. Cycle parking would be located at ground level with associated changing and shower facilities at basement level along with refuse areas. A loading bay accessed from Snowsfields would provide access to an on-site servicing area. All plant would be located at the lower basement and roof level.
34. On the Vinegar Yard Warehouse site, the development would include the retention and refurbishment of the Vinegar Yard Warehouse and the provision of a new side extension up to a total of six storeys (26.188m AOD). The Vinegar Yard Warehouse and extension would deliver 2,794sqm of office (Class E) floorspace. Offices would be located on floors one to five and an office amenity terrace would be provided at roof level. A new 172sqm public realm area would be provided adjacent to the warehouse at ground level. Cycle parking facilities and associated spaces would be located at basement level. All servicing would take place from an on-street loading bay positioned adjacent to the site on Snowsfields.

### Amendments to the application

35. As detailed in the Executive Summary above, various scheme amendments have taken place in order to address the concerns raised by members when the application was deferred. These amendments include:
- Removal of the vertical extension to the Vinegar Yard Warehouse in lieu of a six storey side extension as well as retention and refurbishment of the warehouse. The proposed extension would be a total height of 26.188m and would represent a reduction in height from the previous proposal of 40.8m
  - Redesign of the Bermondsey Street buildings, including retention and reuse of No. 40 Bermondsey Street as well as recessive upward extensions to bring the building to 11 storeys and a maximum height of 50.425m (AOD). This would retain the masonry brick structure and façade of the Bermondsey Street building.
  - Realignment of the proposed new route from Bermondsey Street to Snowsfields from a diagonal route to a perpendicular/dog leg route.

Image – Comparison with original scheme (Vinegar Yard Warehouse)



RPSW designed warehouse scheme

Amended warehouse scheme, without any development over the warehouse hall

Image – Comparison with original scheme (Bermondsey Street)

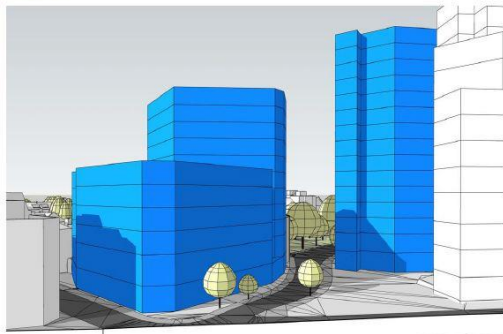


RPSW designed materiality, incorporating glass bricks

Amended materiality - masonry design to lower floors

Image – Massing comparison with original scheme

RENZO PIANO BUILDING WORKSHOP  
February 2020



6 / 11 storey building at Bermondsey Yards, and 15 storey Leather Warehouse

STUDIO RHE + JRA  
April 2022



Refine the environment of the internal street beneath the Bermondsey Yards building. Develop the facade retention detailing.

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

36. As set out previously, taking together the consultation responses on the original submission and the revised proposals, a total of 272 objections have been received as well as 23 representations of support. The main points of the objections are set out below.

- The development would be excessive in terms of height, scale and massing.
- Harm character and setting of the conservation area.
- The development would harm heritage assets.
- The proposed development would have an adverse impact on the Vinegar Yard Warehouse which is a heritage asset with a positive contribution to the Conservation Area and local character.
- The development would cause harm to views.
- The proposal is overdevelopment.
- The development would be out of character with the area.
- The loss of five existing trees is unacceptable.
- The development would result in a loss of daylight and sunlight as well as create overshadowing.
- The development would result in traffic and transport problems.
- The development would not have active frontages at ground level.
- The proposed development would be very overbearing in nature.
- The proposed materials are poor quality and inappropriate.
- The materials for the scheme are very dark and will make people miserable.
- The Construction Management Plan is insufficient and could lead to adverse impacts.
- The various schemes for St Thomas Street should be considered together.
- The development would have an adverse impact on public transport which is already overcrowded.
- The Vinegar Yard Warehouse should be painted hot pink and orange.
- The tree species are not appropriate.
- There would be disruption and disturbance during construction.
- There will be antisocial behaviour from people in the bars.
- The development would create adverse wind impacts.
- The landscaping drawings misrepresent the proposal.
- The local streets and services are not equipped for the increase in population.
- The extension to the Vinegar Yard Warehouse is too tall.
- The public realm and landscaping are poor quality and inadequate.
- There would be an impact on people's privacy.
- There would be an increase in noise disturbance.
- Affordable housing contributions should be secured.
- Nothing has changed between this application and the last one.
- Consultation and engagement has not been sufficient.
- The development is of a poor quality design.
- There is not enough retail space.
- As much historic fabric as possible should be retained in the old

warehouse.

- The development should have been designed as two separate sites.
- The proposal is devoid of character
- There would be a loss of outlook for local residents.
- The refurbishment of the warehouse would be tokenistic.
- There would be increased pollution.
- The development would adversely affect local business and make it difficult for them to hire and retain the best staff and offer them a suitable work life balance due to the impacts on the local area. The visuals submitted with the application are misleading.
- The servicing arrangements are poorly designed.
- The proposed development would impact on the development potential of the Raquel Court site.
- It is not clear how the impacts of the development will be managed should the St Thomas Street developments come forward for development at the same time.
- The building should be future proofed for net zero carbon emissions.
- The area does not need any more commercial or retail space.
- New residents will compete for spaces in schools and doctors surgeries.
- The Council should give weight to the Supreme Court Judgement regarding nuisance overlooking from the Tate Modern.
- The energy and sustainability proposals are unacceptable and insufficient.
- The proposal would result in air pollution and would compromise air quality.
- There would be impacts in terms of light pollution.
- The development would cause increased congestion, noise and air pollution.
- The benefits of the proposed development would not outweigh the harm caused.
- The independent nature of Bermondsey Street should be protected.
- The proposed extensions would fail to harmonise with the scale and architectural style of the original buildings.
- The extensions would fail to harmonise with the character of the area, including respecting the historic pattern of the surrounding area and the established character and streetscene of this part of Bermondsey Street.
- The extensions would not successfully integrate with their surroundings and should read as if it were part of the original buildings.
- The extensions would fail to respect the amenity of neighbouring properties.
- Extensions should be subordinate to the original building and play a “supporting role” to the original dwelling in terms of location, form and scale.

37. The main points made in support of the development are as follows:

- The scheme generally reflects the rich urban grain that is London Bridge.
- The proposed mix of new and old buildings should provide a lively and varied built environment.

- The development would contribute positively to the established character of London Bridge.
- The combination of traditional materials with more modern materials will also add variety.
- The inclusion of new public open space is welcome.
- The proposed covered pedestrian yard to Bermondsey Street has the potential to be a successful addition to the retail experience in the area.
- The development looks good and is a high quality design.
- The development would bring much-needed commercial traffic to the area, supporting local businesses and adding to the already vibrant street life of Bermondsey.
- The positive effects would far outweigh any objections.
- The Vinegar Yard Warehouse would once again be given life.
- The proposal is a clever and sensitive design.
- The stepped-back nature of the upper floors mitigates any objections on the grounds of height and would minimise the visual impact from street level.
- The development would increase jobs
- The new building offers planting which is an improvement on the existing building.
- A modern building would improve the overall carbon efficiency of the buildings in Southwark.
- The development would have excellent access to public transport. The development will fit in with the surrounding context.
- The new buildings sit in harmony with the existing buildings in the local area.

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

38. Any decisions which are significant to the consideration of the current application are referred to within the relevant sections of the report. A fuller history of decisions relating to this site, and other nearby sites, is provided in Appendix 3.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

The main issues to be considered in respect of this application are:

- Principle of the proposed development in terms of land use;
- Environmental impact assessment;
- Design, layout, heritage assets and impact on Borough and London views;
- Landscaping and trees;
- Impact of proposed development on amenity of adjoining occupiers and surrounding area;
- Transport and highways;
- Noise and vibration;
- Energy and sustainability;
- Ecology and biodiversity;

- Air quality;
- Ground conditions and contamination;
- Water resources and flood risk;
- Archaeology;
- Wind microclimate;
- Planning obligations (S.106 undertaking or agreement);
- Mayoral and borough community infrastructure levy (CIL);
- Community involvement and engagement;
- Consultation responses, and how the application addresses the concerns raised;
- Community impact and equalities assessment;
- Human rights;
- All other relevant material planning considerations

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

### **Legal context**

40. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021 and the Southwark Plan 2022. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.
41. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

### **Planning policy**

42. The statutory development plans for the Borough comprise the London Plan 2021 and the Southwark Plan 2022. The National Planning Policy Framework (2021) and emerging policies constitute material considerations but are not part of the statutory development plan. A list of policies which are relevant to this application is provided at Appendix 2. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.

#### Site designations

- Air Quality Management Area
- Bankside, Borough and London Bridge Strategic Cultural Area (Vinegar Yard Warehouse Site)
- Bankside, Borough and London Bridge Opportunity Area
- Borough, Bermondsey and Rivers Archaeological Priority Zone

- Central Activities Zone
- London Bridge District Town Centre (Vinegar Yard Warehouse Site)
- The Thames Special Policy Area
- London Bridge Area Vision AV.11 (Vinegar Yard Warehouse)
- Bermondsey Area Vision AV.03 (Bermondsey Street building)

43. The site is located within Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding however it benefits from protection by the Thames Barrier.

#### The Southwark Plan Site Allocation NSP54

44. The Vinegar Yard Warehouse portion of the site benefits from an allocation within the Southwark Plan 2022. Allocation NSP54 requires redevelopment 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
- Provide a new north-south green link from Melior Place to St Thomas Street; and
- Enhance St Thomas Street by providing high quality public realm and active frontages including retail, community, medical or healthcare or leisure uses (as defined in the glossary) at ground floor; and
- Provide new open space of at least 15% of the site area – 605sqm.

45. NSP54 primarily covers the much larger Vinegar Yard site to the north, taking in the St Thomas Street frontage. Only the southern section of NSP54 relates to the current application, taking in that portion of the site that is occupied by the Vinegar Yard Warehouse.

#### Listed Buildings

46. The following listed buildings are adjacent to the site:

- London bridge Station, Platforms 9-16 (Brighton Side) – Grade II
- 55 Bermondsey Street – Grade II
- Numbers 59, 61 and 63 Bermondsey Street and attached railings – Grade II
- 68-76 Bermondsey Street – Grade II

#### Conservation Areas

47. The site is partially located within the Bermondsey Street Conservation Area. The Tooley Street Conservation Area is located to the north on the opposite side of London Bridge Railway Station.

#### London View Management Framework

48. The application site is located with LVMF protected view 2A.1 from Parliament Hill summit to St Paul's Cathedral, and 3A.1 from Kenwood viewing gazebo to St Paul's Cathedral.

## ASSESSMENT

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

#### Relevant policy designations

49. The redevelopment of the site would be office led and would generate a significant uplift in employment floorspace as well as new retail space. The new public realm and pedestrian routes would significantly improve the street level experience of this area and would improve animation, activity and interest at street level in addition to improving pedestrian connectivity and legibility.

#### *CAZ, District Town Centre and Opportunity Area*

50. The National Planning Policy Framework (NPPF) was updated in 2021. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development. Relevant paragraphs of the NPPF are considered in detail throughout this report. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

51. The application site is part of the London Central Activities Zone and the Bankside, Borough and London Bridge Opportunity Area. The Vinegar Yard Warehouse portion of the site is also located within the London Bridge District Town Centre and the London Bridge Area Vision catchment (AV.11). The Bermondsey Street site is located with the Bermondsey Area Vision catchment (AV.03). London Bridge has the potential to grow its strategic office provision, shops, leisure, culture, science and medical facilities. The site allocations in London Bridge will deliver around 57,000sqm (gross) offices and employment workspaces, 2,100sqm (gross) retail, community and leisure floorspace and up to 10,000 new jobs.

#### *Southwark Plan Site Allocation NSP54*

52. As stated previously, the Vinegar Yard Warehouse portion of the site sites within the NSP54 site allocation. NSP54 primarily covers the much larger Vinegar Yard site to the north, taking in the St Thomas Street frontage. Only the southern section of NSP54 relates to the current application, taking in that portion of the site that is occupied by the Vinegar Yard Warehouse. The allocation sets out that development of NSP54 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
- Provide a new north-south green link from Melior Place to St Thomas Street; and
- Enhance St Thomas Street by providing high quality public realm and active frontages including retail, community, medical or healthcare or leisure uses (as defined in the glossary) at ground floor; and
- Provide new open space of at least 15% of the site area – 605sqm.



53. The site allocation also sets out that the development 'should' provide housing as opposed to it being a mandatory requirement under 'must'. The larger Vinegar Yard site is being considered by the GLA for offices under a separate application. The retention of the Vinegar Yard Warehouse is a priority for the current development and the refurbishment and retention of the warehouse does not lend itself to conversion for housing. On this basis, the objectives of the site allocation are considered to be met with regards to the small portion of the allocation that falls within the current development site. The retention of the warehouse for office space as well as increased office space as a result of the six storey side extension meet the 50% requirement. The extension, which fronts Snowfields, would not fetter the ability of the larger Vinegar Yard development to the north to provide the north south linkages required by the allocation. The 15% open space requirement would be satisfied.

#### Conclusion on policy designations

54. The principle of a development containing a mix of uses including Class E office space, Class E retail, Class E restaurant/café would support the role and functioning of the Central Activities Zone as being consistent with the policies for the Opportunity Area and the site allocation. The acceptability of each use will be considered below.

#### Offices

55. Promoting the economy and creating employment opportunities is a key priority for the planning system. The site lies within a London Plan Opportunity Area (Policy SD1) and partially within a District Town Centre (Policy SD6). London Plan Policy GG5 requires local planning authorities to plan for sufficient employment and industrial spaces to support economic growth whilst Policies E1 and E2 deal specifically with the provision of B Use Class (now called Class E(g) since the change to the Use Classes Order in 2021). London Plan Policy E11 requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases.
56. Southwark Plan Policy SP4 seeks to ensure that Southwark can develop a strong, green and inclusive economy. To achieve this the development plan aims to deliver at least 460,000sqm of new office space between 2019 and 2036 (equating to around 35,500 jobs). The policy states that around 80% of new offices will be delivered in the Central Activities Zone and sets a strategic target of 10,000 new jobs for the Borough, Bankside and London Bridge Opportunity Area. Policy SP4 further requires 10% of all new employment floorspace to be affordable workspace for start-ups and existing and new small and independent businesses in Southwark. Finally, the policy identifies the CAZ and district town centres as appropriate for delivering approximately 19,670sqm of retail floorspace.
57. The aforementioned London Plan and Southwark Plan policies support the provision of a commercial led development on this site. The existing buildings taken together provide approximately 1,493sqm of vacant warehouse

floorspace within the Vinegar yard Warehouse and 2,015sqm of office floorspace within the Bermondsey Street building. The Vinegar Yard Warehouse building is in poor condition and vacant and in its current state cannot be occupied. The proposed development would provide 15,716sqm (GIA) of Class E(g) office floorspace that would have the potential to support up to 915 jobs once operational. This represents an uplift in office employment floorspace of approximately 13,701sqm. This uplift in employment floorspace as well as increased job provision would satisfy the aims of the London Plan and the Southwark Plan in creating new jobs and high quality office space within the Central Activities Zone, the Bankside, Borough and London Bridge Opportunity Area and is a welcome benefit of the development.

### Retail

58. The existing building provides 460sqm of retail floorspace in the form of a bar/restaurant. The proposed development would provide 351sqm of retail space and whilst this is a reduction on the current provision it is not so significant that it would harm the vitality or viability of the Bermondsey Street retail offer.

### Affordable workspace

59. London Plan Policy E2 requires the provision of a range of low-cost Class B1 business space to be supported to meet the needs of micro, small and medium sized enterprises and to support firms wishing to start up and expand. The policy states “development proposals for new B1 business floor space greater than 2,500sqm, or a locally determined lower threshold in a local development plan document, should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises.
60. Policy E3 of the London Plan 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 purposes”. The policy identifies the circumstances in which it would be appropriate to secure affordable space.
61. Southwark Plan Policy P31 deals with affordable workspace. Criterion 2 of the policy requires Major ‘B Use Class’ development proposals to deliver at least 10% of the floorspace as affordable workspace on site at a discounted market rent for a period of at least 30 years. The policy recognises that there are many different forms that such space could take depending on the site location, characteristics and existing/proposed uses on site. The space should be offered to existing business on site first and then small and independent local businesses. Only where on-site provision would be impracticable are developers permitted to make a payment in lieu of the on-site provision.
62. In exceptional circumstances affordable retail, affordable cultural uses, or public health services which provide a range of affordable access options for local residents, may be provided as an alternative to affordable workspace (employment uses). This will only be acceptable if there is a demonstrated need for the affordable use proposed and with a named occupier. If the alternative affordable use is no longer required in the future, the space should be made

available for affordable workspace (employment uses).

63. The proposed development would provide a total of 15,716sqm of employment floorspace and as such a total of 1,572sqm of affordable workspace should be provided in order to comply with planning policy. The applicant proposes to offer this fully on site at ground and first floor. This would be offered on a 25% discount on market rent for a period of 30 years and meets the Southwark plan 10% requirement.
64. The Class E(g) office space and affordable retail unit would be offered at a 75% discount on market rent with relevant stair casing from a peppercorn rent to the 75% level over the course of a 24 month period as set out below:
- 0-6 months at 100% discount (rent free period);
  - 7-13 months at 60% discount on the Local Open Market Rent;
  - 14-22 months at 40% discount on the Local Open Market Rent; and
  - From month 23 onwards at 75% of the Local Open Market Rent.
65. In addition, the Section 106 Agreement would include an Affordable Workspace Strategy. This would ensure, among other things, that:
- the workspace is provided for a 30-year period at the discounts set out above;
  - no more than 50% of the market rate floorspace can be occupied until the affordable workspace has been fitted-out ready for occupation;
  - detailed plans showing final location of affordable workspace;
  - a management plan is in place to secure the appointment of a Workspace Provider and a methodology for that Provider to support the occupiers;
  - appropriate marketing of the affordable workspace will be conducted; and
  - the rates and service charges payable by the tenant will be capped.

## **Environmental impact assessment**

66. Environmental Impact Assessment is a statutory procedure that provides for a process assesses and reports upon the beneficial and adverse (positive and negative) environmental effects of development projects. The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations 2017 and constitutes EIA development having regard to its potential for likely significant environmental effects.
67. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the Council has undertaken an Environmental Impact Assessment, taking account of the environmental information, which includes the ES, any further information, any representations made by consultation bodies, and any other person, about the environmental effects of the development.
68. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a Non-Technical Summary, Environmental Statement and Technical Appendices accompanies the application. This includes the 2019 ES and addendums as well as the Addendum ES that accompanies the revised proposals.

69. The Addendum ES considers the need for the re-assessment of significant effects on the environment as documented in the 2019 ES and supporting Addenda. It describes the scope of the EIA and presents updates to certain parts of the EIA as appropriate based on:
- The nature of the changes between the 2019 design and the currently proposed design material changes or updates to existing planning policy, including the 2021 London Plan1 and The Southwark Plan 2022;
  - material changes in EIA technical practice;
  - material changes or updates to baseline environmental conditions; and
  - material changes to the list of cumulative developments previously assessed.
70. Together, these various documents constitute the ES that has allowed a full Environmental impact Assessment to be undertaken by officers and this information has been taken into account in reaching the proposed recommendation. Officers are satisfied that, with the addendum ES, the ES is up to date and that the effects described in the ES properly identify the likely significant effects of the proposed development on the environment.
71. Where the findings of the original ES are still relevant this will be stated explicitly in the relevant following chapters and assessments. Where topics have been reassessed due to changes in the outcomes as a result of the revised proposals then this will be set out in full.

#### *Alternatives*

72. The EIA Regulations requires the ES to provide information on the alternative options considered by the applicant. The 'Do Nothing' alternative would leave the application site in its current state. This scenario is considered in the ES to have no environmental benefits compared with the proposed redevelopment of the site.
73. The ES also describes the design evolution of the scheme as well as environmental factors including townscape; wind microclimate; daylight and sunlight; impacts on views; and air quality. This has been further adapted by virtue of the revised proposals. The original scheme was been informed by testing various options and having full regard to the constraints and opportunities presented by the site as well as issues raised during the process. The revised proposals have considered these issues and the scheme revisions were informed by the previous ES. Where relevant, potential effects have been set out in the Addendum ES.
74. Officers are satisfied that the full ES (2019 ES, Addendum ES and relevant addenda) has investigated alternatives for the site and that the proposed development maximises the development potential of the site whilst seeking to minimise environmental impacts. The site occupies a prominent central London location in the Bankside, Borough and London Bridge Opportunity Area. To not develop the site would lead to a missed opportunity to secure a high quality scheme.

#### *Cumulative impacts*

75. The 2019 ES and Addendum ES both consider cumulative effects arising from the proposed development in combination with other surrounding consented and planned developments. The list of cumulative schemes has been updated from the 2019 ES and is set out at Appendix C of the Addendum ES. As with the 2019 ES, in most cases the cumulative impacts of the development were limited. A detailed assessment of the likely potential and residual impacts of the scheme is provided in the relevant sections of this report, taking into account the ES and the material planning policy considerations.

### *Conclusions on the EIA*

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

## **Design**

77. 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.
78. 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 context

79. 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 and this is reflected in Southwark Plan Policy P18.
80. The site sits within the varied context of the Grade II listed railway arches on St Thomas Street and Crucifix Lane opposite to the north; a mixture of modest-scaled, repurposed workshops and warehousing, and housing and social infrastructure that date from the mid Victorian period through to the 1930s to the south and east; and a series of hoarded development sites along St Thomas Street to the west, including Vinegar Yard site with its meanwhile food and

beverage market; and the 1980s, 16-storey Wolfson House (Guy's Hospital) at no.49 Weston Street beyond.

81. The application buildings, no.40 and 42-44 Bermondsey Street sit outside but immediately adjacent to the Bermondsey Street conservation area, which runs along the full length of Bermondsey Street to Crucifix Lane on its east side but stops short of the application buildings on its west side. However, the site's mid-Victorian warehouse on Vinegar Yard is within the conservation area, which includes the building in a spur that also includes the Horseshoe Public House and its neighbour, no.1-7 Fenning Street and the buildings that front onto the south side of Weston Street. The site's Vinegar Yard Warehouse building is regarded as a positive contributor to the conservation area.
82. Tooley Street and its conservation area are located just to the north of the site, immediately beyond London Bridge station and its viaducts; whilst Borough Conservation Area and Tower Bridge Conservation Area are located some 400m to the west and northeast respectively. The site falls within the Central Activities Zone (CAZ) which is characterised in this location by a rich mix of historic and modern buildings, streets and places; the vibrancy and diversity of its uses; and by landmark buildings and infrastructure, including most noticeably the Shard, which dominates the skyline with its monumental scale and outstanding architecture.
83. The scheme was initially conceived as part of a wider development framework that ran between Weston Street to the west and the head of Bermondsey Street to the east and included the neighbouring development plots of Capital House, Becket House and Vinegar Yard. The sites' landowners sought to coordinate an approach for comprehensive redevelopment and established a masterplan for the area.
84. At the time, the masterplan envisaged a series of perimeter buildings that reinforce the street edges of Weston Street, St Thomas Street and Snowsfields and defined a public garden to the rear towards Weston Street and a new plaza space towards Snowsfields. It retained north-south routes across the site and opened up a new east-west pedestrian route that bisects the masterplan area, linking Weston Street with the two new public spaces and through to Bermondsey Street. The redevelopment schemes were mostly for commercial offices, but with significant elements of retail, leisure and student accommodation; and were mainly conceived as tall buildings.
85. The Council has granted consents for the redevelopment of Capital House and Becket House that generally align with the masterplan. The GLA has resolved to grant consent for the Vinegar Yard development for a large medical-use scheme in connection with Guy's Hospital, although the S.106 has yet to be agreed. However, in contrast to the masterplan and the initial application to the Council, the Vinegar Yard scheme retains no.1-7 Fenning Street, a two-storey Victorian warehouse, which is extended upwards and to the side, and has reduced the north-south route to a passageway that briefly passes through the side extension, as a semi-public lobby.
86. The masterplan intended a large plaza within Vinegar Yard and an onward

diagonal pedestrian link running through onto Bermondsey Street. A public space within Vinegar Yard and an onward route through to Bermondsey Street remain relevant, although the building forms and layout of the public realm are no longer as provisionally set out.

87. The general design intent for the application site similarly remains relevant. The scheme remains an important townscape moment, transitioning a shift in character and scale from the modern, headquarter style office developments emerging on St Thomas Street through to the more fine-grained, historic context of the adjoining Bermondsey conservation area. It blends old and new architecture, hi-rise and modest scales, and street-based buildings. It is intended to moderate the otherwise marked changes in townscape and character, albeit refocussed on the Bermondsey Street buildings.

### Site layout

88. The revised development's layout is well conceived and remains a distinct improvement on the present condition of a mainly disengaged and under-utilised site. The new layout promotes good urban design, with a coherent arrangement of legible new buildings and spaces that provide an engaging, functional and safe public realm.
89. As previously, the development adopts a perimeter block layout, where the retained and new buildings respond to the general street form and building alignment, promoting a strongly defined public realm. The warehouse is refurbished and its site hoardings removed, re-establishing the building's positive relationship with Vinegar Yard; whilst its extended form to the south replaces the former car park, infilling the unattractive gap in the street scene and re-establishing the common building line along Snowsfields.
90. The corner building of no.40 Bermondsey Street is retained, maintaining the current, strong definition of this important street corner of St Thomas Street with Bermondsey Street and Snowsfields, with its chamfered built form that reflects the Edwardian building on the opposite corner (no.35-37 Bermondsey Street), which is a positive move. The replacement built form at no.42-44 is inserted in alignment with no.40, maintaining the building line along Bermondsey Street, whilst the 'rear' extension is inserted onto Snowsfields in alignment with the flank façade of no.40, re-establishing a common building line along the street, which is welcome.
91. The new feature of the revised layout is the reimagining of the pedestrian link that connects Bermondsey Street with Snowsfields. In the revised proposals it adopts the more informal character that cuts beneath a building and leads to a central space that is open to the sky, reflecting the service yard character that is typical of the local area and previously existed as White Lion Court until the 1940/50s. The route offers good local permeability and connectivity, without diluting the role of the perimeter streets as the primary thoroughfares and frontages. The reinstated 'yard' would offer an attractive alternative route for those pedestrians wishing to meander.

92. Importantly, the site layout provides a series of commercial entrances and shopfronts that support active street frontages and good informal surveillance of the surrounding public realm and the new 'yard'. The existing corner entrance of no.40 is retained, providing access to the ground floor retail/restaurant, and is supplemented by a further corner entrance onto the new yard further along Bermondsey Street. The replacement building at no.42-44 has a double-door entrance on Bermondsey Street to the offices, which is supplemented by a further entrance within the yard. The yard includes the entrance to the end-of-journey facilities (incl. cycle storage) for the main offices, as well as a secondary shopfront to the new café facility that is shared with the offices. The yard space itself is designed to accommodate pop-up kiosks, bringing additional activity to the route.
93. Regarding the Vinegar Yard Warehouse site, the main office entrance is onto Snowfields, linking up with the adjacent retail parade and fostering its active street frontage. The main entrance sits diagonally across from the new yard and main building entrance of Bermondsey Street building, heightening the sense of activity at this point within the streetscape. Whilst the warehouse building itself does not feature a separate entrance, the intention is to refurbish the ground floor windows, bringing animation to the building's frontages and providing good informal surveillance of Vinegar Yard and its new public realm, and onto the adjoining passageway through to Melior Place. Servicing takes place on-street for the Vinegar Yard Warehouse site, whilst the Bermondsey Street building has a dedicated off-street loading bay, arranged to minimise its impact on the public realm.
94. Overall, the general layout is well-considered, fostering good permeability, a well-activated public realm and local distinctiveness. At grade, the proposed urban form is coherent and the urban design quality is high, and is welcomed, subject to conditions confirming the detailed treatments of the new entrances (incl. signage, gates for the pedestrian link, entrance canopies).

### Built form and scale

95. As referred to above, the focus for the floorspace increase has been shifted from the Vinegar Yard Warehouse site to the Bermondsey Street site, the intention being to better respect the former warehouse building and preserve the character of the local conservation area. The warehouse, with its polygonal massing and double-pitched roof, is largely retained in form and refurbished in appearance, and with its key internal features preserved where possible. The building's side extension is of a comparative scale to the host building, but is designed to read in part as a discrete building that complements the warehouse and to achieve a 'critical mass' that supports its functioning as a high quality office building.
96. The new addition is set slightly recessed behind the east façade of the warehouse, with the approximately 1m return working sufficiently well to maintain the visual prominence and sense of form of the warehouse onto Vinegar Yard. Similarly, the addition does not run the length of the host building's flank (south) elevation, but is set back approximately 2m from the chamfered corner,



preserving the appearance of and outlook from existing stacked corner windows. The addition has a comparatively simple footprint and massing, which extends out to the site's boundary onto Snowfields and is extruded upwards over six storeys. It is given a pitched roof with a gable end, replicating the roof form of the host building.

Image – Proposed Vinegar Yard Warehouse extension



Leather Warehouse with external staircase absorbed within the building

97. The extension is 7m taller than the host building, which is a reasonably modest difference. Importantly, its visual impact is softened by the setbacks and use of a similar roof form, and particularly by the discrete architectural appearance of the addition. In adopting a contrasting, but complementary design, the extension reads more as a moderately taller neighbouring building that adds to the fine grain appearance of the townscape.
98. Its scale does not overwhelm the host building or the adjacent public realm, particularly given the open character of Vinegar Yard, and sits comfortably within Snowfields, bookending the adjacent four storey parade. As such its height and massing are supported.
99. Looking at the Bermondsey Street building, the designs are intended to offer a street-based built form that extends to become a sculpted, large scale building in a highly engaging manner. The new building is 'grounded' in retaining the existing four storey warehouse-styled corner building (no.40), which is matched by a similar four storey new built form on the site of no.42-44. Together, at 16.5m to parapet level, the two volumes support the prevailing scale of Bermondsey Street, sufficiently reflecting the general shoulder height and fine grain built form

of the local context.

100. The main building volume is set back from the Bermondsey Street frontage and is massed as a series of double-storey layers that extend above in a doughnut and horseshoe arrangement, with the office floors wrapping around a central, open lightwell that sits above the midpoint of the new yard. The double-storey layers tier rearwards away from Bermondsey Street and inwards away from Snowfields, reducing the sense of height and bulk onto the two main frontages. The double-storey layers are cantilevered to further erode the massing and help create a series of large roof terraces that provide extensive greening and outdoor amenity for the building's occupiers. The highly articulated massing gives a dynamic built form that is distinctive and highly engaging, particularly when viewed from Vinegar Yard and along Snowfields.

Image – Proposed Bermondsey Street building



101. At 11 storeys (50.425m AOD), the new building on Bermondsey Street is taller than its immediate context. However, views of the additional scale are generally obscured by the dense form of the adjoining streets, with the sculpted built form of its upper storeys easing its sense of scale where visible. The application building would read as the outermost edge of a new cluster of tall buildings within the London Bridge station area that includes Wolfson House, Guys Tower and the Shard complex, and would be seen to graduate the building heights downwards towards the historic and more domestic scale of north Bermondsey. Its position on the junction with Snowfields would present a notable end-stop to this emerging context of tall buildings.

### Architectural quality

102. The derelict warehouse is retained and refurbished, with any dilapidated or heavily altered elements rebuilt to match the original and as many of its historic features restored or re-used as possible. Externally, the building's principal street facing brick elevations are retained and repaired, and its west elevation partly rebuilt. The external cranes, hatch rank doorways, segmented brick arches and York stone cills on its north and northeast elevations are refurbished and are reinstated on the east elevation where they are missing. The brickwork is gently cleaned, with the faded painted sign on the east elevation retained for visual interest. The building's cast iron and steel windows are replaced throughout, using steel Crittal windows to match, upgrading their performance. The existing roof form is proposed to be altered, removing one of the two double-pitches and flattening out the section of roof to provide a high-level terrace as an outdoor

amenity space for the new offices. The outer pitch (north) is retained, as are the front and rear gables and the pedimented upstand to the front, which will sufficiently preserve the distinctive roof profile. As such, when seen from the adjoining public realm, for the majority of the building its strong warehouse character and appearance is sustained.

Image - View looking east



103. The main exception is the building's south elevation, which is currently onto the area of hardstanding. The proposal is to partly demolish the elevation and to open up the building envelope to connect through to the new addition. As referenced above, the extension intentionally takes on a different architectural character, contrasting with the warehouse, but in an understated manner. The facades feature a simple, modern design, comprising curtain walling with bronze-coloured pressed metalwork cladding, partly wrapped on the west and south elevations by a four storey brickwork facade with punched-hole openings.
104. The curtain walling has a strong horizontal emphasis with its projecting top and bottom frames, which is enhanced by the glazed corner junctions of the south and east elevations. This horizontality is offset by the series of fine vertical metalwork fins set into the curtain wall framing and by the stacked arrangement and detailed design of the pressed metalwork cladding. The cladding features vertical joints and is set out to form a solid end section of wall that runs the height of the new extension adjacent to the warehouse (east elevation). It is also used to provide a more solid finish to the fifth floor and gable roof form.

Image – New yard



Amended Yard looking towards Snowfields

105. The outcome is a sharply detailed, contemporary character, which is softened and contextualised in part by the multi-stock brickwork screen on the south and west façades. The extensive glazing and corner windows present an open aspect, animating the building, particularly on its junction with Snowfields. Overall, the designs are a well-considered balance of visual robustness and transparency, and an engaging contrast to the refurbished warehouse. The designs are supported, subject to the detailing and material finishes of the curtain wall framing, cladding and brickwork.
106. In terms of functional quality, the proposals are to locate the entrance and lobby area, stairs and lift cores, ancillary services (incl. toilets) and meeting room spaces within the new extension. This frees the warehouse to provide high quality, flexible office floorspace, benefitting from its open plan form, large openable windows and attractive features (incl. characterful cast iron columns and timber beams). Services will be exposed, maintaining the high ceilings, although the space will mainly be naturally ventilated. Access to the office floorspace is provided through the partly demolished south façade. A new basement is excavated beneath the extension, providing end-of-journey facilities and plant, whilst the large reception includes a café. As referenced earlier, the development includes a rooftop terrace, located above the warehouse, and accessed from the extension.
107. The Bermondsey Street building is complex, with the adaptation of the existing building at no.40, the insertion of a similar new four storey 'building' at no.42-44 and the intervening service yard link, and the tiered layering of the modern office floorplates with terraced gardens above. The design intention is to retain and augment the familiar warehouse-style corner building and to create a high-quality

modern office building that fronts onto Bermondsey Street, Snowfields and the new service yard in similar warehouse-styled brick façades, but which then emerges as a distinctly contemporary building above roof level.

108. Briefly taking the main elements in turn, no.40 is remodelled to provide a simple, modern but more contextual aesthetic. The interventions comprise the replacement of the building plinth's pink marble cladding in grey precast stone tiling and the staining of the adjacent brickwork to match; the insertion of a precast stone lintels and matching stringer above the ground floor windows; the replacement of the column capitals with brickwork to match; the replacement of the corbelling above the top window heads in precast stone; and the introduction of simple precast stone cornice and coping details. The window openings are lengthened, with the removal of the brickwork arched lintels, and the windows refenestrated, incorporating an openable margin light. A double-height oriel window is inserted as a picture window for visual interest. The same design aesthetic is used to extend the street façade of no.40 along Snowfields, and for the public facades to the replacement no.42-44. Overall, the designs are effective and bring a more sober, contemporary character to the elevations that sit well with the warehouse character of Bermondsey Street.
109. Above parapet level, the new tall building emerges as a series of tiered floorplates, setback to maintain the building datum onto Bermondsey Street and Snowfields, and carved backwards to reduce overshadowing and sense of scale in immediate views. The tiers broadly step every two storeys in pairs. However, the façade designs are cleverly articulated to emphasize the upper floor of the pair and to play down the appearance of the corresponding lower floor. Whilst all finished in curtain walling, the upper floor incorporates solid metalwork panelling and parapet upstands, and modestly cantilevers above the lower floor. The latter is finished in clear curtain walling only, lightening its appearance in contrast to the upper floor. The effect is to visually erode the built form and give a dynamic quality to the building's appearance, which is engaging. Much will depend on the detailing of the curtain walling and soffit finishes of the cantilevers, which should be conditioned. The extensive perimeter planting and rooftop gardens soften the building's appearance and add further visual interest.
110. In terms of functional quality, the new building would comfortably achieve BREEAM 'Excellent' and is targeting an 'Outstanding' rating. The designs feature excellent internal ceiling heights and open-plan flexible office floorplates, with good daylight penetration, including from the open lightwell that drops through the centre of the building. The building features mixed-mode ventilation and exposed services, and benefits from the extensive provision of rooftop terrace gardens for amenity. The large reception area is accessed from the street and from the yard, and includes a café facility, whilst extensive end-of-journey facilities are provided within the basement. Overall, the functional quality is high and the architecture distinctive and engaging.

### Tall building

111. The Bermondsey Street building reaches a maximum of 47.5m above grade

(including rooftop plant) and is taller than its immediate context to the south and east, although the contextual scale rises eastwards towards Guy's Hospital and London Bridge station beyond. As a tall building, it is located within CAZ and the BBLB Opportunity Area where such high-rise intensification of development is generally appropriate. Nevertheless, the tall building is expected to also comply with policy P.17 in full. Looking at the policy requirements:

*Point of landmark significance*

112. The application site sits at the point of convergence of St Thomas Street, Crucifix Lane, Bermondsey Street and Snowsfields immediately to the south of London Bridge Station, one of London's major transport interchanges. As such the application site is considered to be a point of landmark significance and the site will be important in landmarking a 'gateway' into the St Thomas Street masterplan area from the south and west and in signifying the junction of St Thomas Street with Snowsfields and Bermondsey Street. Its landmark value is more in consolidating and marking the endpoint to the emerging cluster of tall buildings that collectively express the commercial hub of London Bridge.

*Proportionate in height*

113. At 11 office storeys (50.425m AODm) in height, the building is a moderately tall building and not especially tall compared to the proposed replacement buildings for Capital House (approximately 134m), Becket House (approximately 110m) or Vinegar Yard (approximately 94m). This more moderate scale works well, given its position on the edge of the emerging cluster and adjacency to historic Bermondsey Street. Its height serves to graduate the tall building heights down to the more traditional and domestic context, with the shoulder heights of the retained no.40 and its matching no.42-44 contributing to the effect. Furthermore, its height is sufficiently moderate to work well as a local landmark on the junction of Snowsfields/ Bermondsey Street and St Thomas Street and not to become overbearing in local views. Overall, its scale is considered proportionate to the significance of its location and size of site.

*Positive contribution to the London skyline*

114. Its contribution is positive, mediating the distinct change in scale and character from the modern, taller context of Guy's Tower and the Shard beyond down to the historic, finer grain of north Bermondsey, and providing an engaging end-stop to the tall building cluster. Furthermore, its extensively articulated built form and layering of planted terraces will bring a distinctive and pleasing appearance to the local skyline.

*Not cause harm to strategic or borough views*

115. As set out in more detail below, the revised scheme would have a negligible impact on strategic views, being just visible in several riverside prospects. Whilst it would be more evident in borough views, its appearance would not be harmful, and as such would be policy compliant.

Image – Bermondsey Street building



*Responds positively to local character and townscape*

116. The revised scheme responds positively by using the street-based architecture of nos. 40 and 42-44 to 'ground' its new tall building within the local context. The properties sit well within the street, responding to its built form and characterful appearance, with the remodelled no.40 and replacement no.42-44 adopting a contemporary, warehouse-style aesthetic. In addition, the buildings sit either side of a new pedestrian link, which is well conceived as a traditional-style service yard, adding to local distinctiveness.
117. Above this, the tall building is skilfully articulated to scale back from the street scene and to provide a distinctive and engaging architecture that works as a counter-point to the street-based buildings and offers a notable landmark where visible in the local townscape. The retention and refurbishment of the Vinegar Yard Warehouse also a positive contribution of the scheme as a whole.

*Provide functional and commensurate public space*

118. The development provides two notable extensions to the public realm: Most



significant is the new pedestrian route that runs through the Bermondsey Street site, linking to Snowfields. The 7m wide route is surfaced in decorative granite sett paving and adopts the character of a traditional service yard that cuts beneath the street buildings. Open to the public, the new through-route provides c.420sqm of public realm and includes informal seating and the opportunity for pop-up concessions, making for an appealing space. The route is secured out of hours with gating.

Image – Plan of open space



119. The removal of the hoarding on the Vinegar Yard Warehouse site opens up its north perimeter to provide approximately 170sqm of new public realm. The space is hard landscaped and features groups of new street trees, planting and bench seating, providing an attractive, informal public space that also improves pedestrian permeability through the area. In time, the space would be complemented by additional public realm created by the neighbouring Vinegar Yard site, once the CIT development comes forward.
120. Elsewhere, the development would extend the footway on the east side of Snowfields, providing approximately 160sqm of additional pavement space and the opportunity for new street tree planting, further softening the townscape. Overall, the landscape contribution is commensurate with the proposed scale of development.

*Provide new publically accessible space at or near the top*

121. The development does not incorporate any high-level viewing gallery or commercial use that would be open to the public. Whilst it includes a rooftop garden above the retained Vinegar Yard Warehouse and a series of gardens terraces on the upper floors of the Bermondsey Street building, the outdoor amenity would be available to the building occupiers only. As it is, the

development is for a moderately tall building and, although the outlook would include northward views towards the river, the vantage point gained would be of lesser public interest compared to the opportunity from other much taller buildings and structures within the London Bridge and Tower Bridge areas. Its policy requirement in this instance is therefore considered of lesser material weight.

*Exemplary architectural design*

122. The tall building is a well-designed modern building in terms of its functional quality and its architecture, offering a well-appointed contemporary headquarter office building, but with flexible floorplates that would support adaptation and sub-letting. The building is served by an appropriately sized lobby with the main entrance onto Snowsfields and is supported by a secondary entrance onto the characterful service yard that also provides access to the basement end-of-journey facilities. The building has a dedicated off-street loading bay. The main office floors benefit from ceiling heights of 3.0-3.2m with underfloor services; large windows with the option of natural or mechanical ventilation; a large central lightwell, ensuring good levels of daylight throughout; and access to landscaped terraces on the 4<sup>th</sup>, 6<sup>th</sup>, 8<sup>th</sup> 10<sup>th</sup> and 11<sup>th</sup> floor levels.
123. Regarding the elevational architecture, as set out earlier, it is well conceived and well detailed, with a high quality material palette. The architecture has a strong compositional quality, 'plugging' into the context of Bermondsey Street with its sober warehouse-style building frontages and characterful service yard with bridge links, and emerging above parapet level as a series of heavily articulated floors that cantilever and tier away in a series of layers to produce a highly dynamic and contrasting appearance. Its detailed finish is textured and contemporary, softened by the planted terraces. The outcome is effective and engaging.

*Conserve and enhance heritage assets and contribute to townscape character*

124. As set out in more detail below, the scheme has been revised to retain the Vinegar Yard Warehouse in a much more sensitive manner and to develop the adjacent open land as an extension that supports local distinctiveness within this part of the Bermondsey Street conservation area.
125. The Bermondsey Street site is outside, but adjacent to the conservation area. Its development as a tall building sits in contrast with the more traditional and domestic scale of the immediate surroundings. It works well as a notable local landmark in several townscape views. It is visible from within the adjacent conservation area and as such does affect its setting. Its sense of scale is eased by its articulated form and engaging appearance and it is considered that it is of limited harm to this setting. This impact is balanced against the contributions its street-based buildings and new yard make to the townscape character and the positive contributions made to the Snowsfields site.

*Positive relationship with the public realm*

126. The development promotes a positive relationship with the public realm in several notable ways. Its design concept of 'grounding' the tall building as conventional street-based buildings with shopfronts onto Bermondsey Street and Snowsfields, providing activity onto and oversight of the adjacent public realm. The restaurant/retail entrance works particularly well positioned on the street corner, whilst the affordable office entrance adds to the rhythm of entrances along Bermondsey Street itself.
127. Secondly, the main offices present onto Snowsfields in a highly legible position, with the main entrance evident in views from St Thomas Street and across Vinegar Yard. Its large foyer should provide significant animation of the adjacent public realm.
128. Thirdly, in addition to activating the development's perimeter, the offices feature secondary entrances that activate the new pedestrian route that passes beneath the tall building. This new element of public realm further benefits from a café concession and a series of possible pop-ups that will bring activity and character to the new public realm.
129. Lastly, there is the positive relationship that the wider development makes, with the refurbishment and opening up of the Vinegar Yard Warehouse building, with its office entrance and café animating Snowsfields and new plaza space onto Vinegar Yard, and the warehouse providing oversight of the passageway through to Melior Place. Taken as a whole, the development achieves a notably high quality of urban design.
130. Overall, the development's designs sufficiently meet the policy criteria for a new tall building. However, a significant outcome of a tall building is its visibility and whilst this is not harmful in itself, the potential effects on the 'receptor' townscape and heritage assets must be considered.

### **Heritage considerations**

131. The submission includes a Zone of Visual Influence (ZVI) and a townscape visual impact assessment (TVIA), both of which have been updated to take into account the revised design approach. The ZVI comprises a map indicating where in the surrounding area the new tall building would probably be visible from, but excludes the impacts of any tree cover. The TVIA provides 28 verified images of the development when viewed from chosen locations in and around the Bermondsey and London Bridge areas, and of relevant protected London panoramas.
132. In general, the development is less widely visible than expected for a tall building. In part, this is because of the large buildings located mainly to the north and west of the site that often mask the development from wider view. It is also a reflection of its proximity to the broad railway viaducts running into London Bridge Station and the tight, historical urban form to the south and east that offers limited visual prospects. Nonetheless, it is likely to remain sporadically visible along the

Thames riverfront around Potters Field, Tower of London and St Katherine's Dock; and occasionally in long distance views from Jamaica Road to the east, Bermondsey Spa to the southeast, Tabard Gardens, Great Dover Street, New Kent Road flyover and a number of intervening streets to the southwest where the roadway directly aligns with the site.

133. Of more significance, the development is visible in a number of nearby and middle distance views where it affects upon the settings of designated heritage assets and the local townscape. Looking briefly at the categories of views and townscape in turn:

*Impacts on Protected Views*

134. The LVMF seeks to protect and manage 27 views across London and some of its major landmarks. The submission demonstrates that at the proposed height the development will have no impact upon the selected protected views of St Paul's and little discernible impact upon London's riverside prospects.
135. In the panoramic view from Parliament Hill to St. Paul's (views #1, #1.1), although the development is in alignment with St Paul's, the new tall building would not be seen, being mostly obscured by buildings in the foreground, with its uppermost floors partly obscured by St Paul's itself and partly by the Shard in the cathedral's backdrop. Similarly, from Kenwood (views #2, #2.1) the proposed building is completely obscured from view by Cannon Street Station to the east of St Paul's, with the cathedral's setting unaffected.
136. Looking at the river prospects, from upstream the development is mostly obscured from view by no.3 More London when looking from Tower Bridge, emerging briefly to its west and above the tree cover, but sitting well below the general rooflines of the riverfront buildings and Strata building in the backdrop. It has a negligible impact on the panorama (view #11). It becomes completely obscured in the downstream view from Southwark Bridge (view 12), being completely obscured by Minerva House and the Shard complex in the middle ground.
137. Although not demonstrated by modelled or verified views, the development would be unlikely to have any notable impacts on the Borough's protected views of St Paul's, being outside the viewing corridor, or on the river prospects from King's Stairs Gardens or the Millennium Bridge. Whilst the tall building would be visible on the skyline from the elevated positions of Nunhead Cemetery and particularly One Tree Hill, it would be seen well away from St Paul's and read as part of the loose cluster of tall buildings around London Bridge Station. The ZVI indicates that the proposal would not be seen from the Millennium Bridge.

*Impacts on the World Heritage Site*

138. The Tower of London is a heritage asset of the highest order. It is Grade I statutory listed and is recognised internationally as a certified World Heritage Site

of Outstanding Universal Value. In such cases, any development that intrudes upon views within the Tower complex must be carefully considered.

139. In this instance, however, the development is not visible from within the tower complex. It remains sufficiently low on the skyline to be obscured from view by the tower's buildings and ramparts or by intervening buildings in the middle ground. As demonstrated by the views from within the Inner Ward towards the site of the scaffold (view #3) and the wider setting from the White Tower, the development would sit well below the roof profile of the Queen's House, extending only briefly to its west where it is nonetheless hidden behind the tower's ramparts and no.4 More London. In the view from Lanthorne Tower, the development remains fully below the ramparts (view #5); whilst from the ramparts themselves, the development is hidden from view behind no.3 More London (view #6).
140. The updated submission includes three selected views from nearby to the Tower of London, looking towards the development and showing the setting of the World Heritage Site. It is evident that the development has no effect on the World Heritage Site's setting in these views. From Tower Hill (view# 7) and Wakefield Gardens (view #8), the development is obscured from view by no.7 More London, whilst in the view of the Tower of London from the Mint (view #9) the proposed development is obscured by the historic complex itself.

*Impacts on local heritage assets - conservation areas and listed buildings*

141. 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 "
142. The NPPF (2021) provides guidance on how these tests are applied, referring in paras 199-202 to the need to give great weight to the conservation of the heritage asset, and the more important the asset, the greater the weight; evaluate the extent of harm or loss of its significance; generally refuse consent where the harm is substantial; and, where necessary, weigh the harm against the public benefits of the scheme. Para 203 addresses non-designated heritage assets (NDHA) and the effect an application may have on its significance, directly or indirectly. It advises on the need for a balanced judgement, "having regard to the scale of any harm or loss and the significance of the heritage asset".

*Conservation areas*

143. The Vinegar Yard Warehouse part of the application site is within the Bermondsey Street conservation area, which has the Church of St Mary Magdalen and the high street as its focus, but spurs both eastwards and westwards: The latter spur extends to include the Vinegar Yard Warehouse (no.9-17 Vinegar Yard). No.40 and no.42-44 Bermondsey Street are outside, but immediately adjacent to the conservation area.

144. The Conservation Area's special interest is its historic development of tightly packed 18th century housing, many with shops, and modest scaled late 19th/early 20th century warehouses and workshops that have adopted the medieval pattern of narrow streets and plots, arched alleyways and rear yards. The tight urban scale, simple classical architecture and industrial detailing have created an evocative and characterful townscape. All but cut-off from the riverside by the construction of London Bridge station in the 1830s, the area has evolved as a quiet hinterland; distinctly different in purpose, scale and character from the wharves, warehouses, institutions and commerce of the nearby Tooley Street and Tower Bridge conservation areas. As its CAA records, this clear change in character has prevailed and is made evident by the close proximity to the hub of activity and large developments associated with Guy's Hospital and the London Bridge area.
145. The Vinegar Yard Warehouse is identified within the Conservation Area Appraisal (CAA) as making a positive contribution to the local conservation area. Despite its current poor condition, the warehouse remains a robust, characterful stock brick building that clearly expresses its function, and is a strong reminder of the historical industrial character of this part of Bermondsey. The building is very much part of the character and appearance of the conservation area, and is regarded a non-designated heritage asset.
146. Looking at the revised scheme, the designs no-longer promote the oversailing of the warehouse and transforming it into a 17 storeys tall building, but relocates the tall building onto the adjacent Bermondsey Street site, outside the conservation area, and reduces its overall height to 11 storeys. In terms of the warehouse, the proposals take a significantly more sensitive approach of restoring and adapting the building for office use, incorporating a six storey side extension. The direct effect on the conservation area is beneficial, with the warehouse retained as a legible and distinct building within the streetscape and its positive contribution generally enhanced through its restoration and re-use.
147. The side extension is sizeable and affects the south elevation of the warehouse, requiring its partial demolition and obscuring it from view. However, the extension's built form and material finishes are well considered and its architecture is distinctive. Its quasi-industrial design is characterful and supports local distinctiveness. Overall, the extension is engaging, but remains sufficiently understated in its appearance (view #21). It sits well with the host building, contrasting in a complementary manner; and does not impose harmfully in the backdrop to the diminutive Horseshoe public house, including in the notable vista along Melior Street (view #23). Furthermore, it completes the fractured street scene within Snowfields, infilling an unsightly area of open space. Overall, the extension enhances the local townscape and preserves the setting of the adjacent conservation area.

Image – View from Bermondsey Street/Tanner Street Park



148. Regarding the Bermondsey Street site, overall, the scale, height and massing of the 11-storey height contrasts adversely with the low-rise, fine grain built form of the neighbouring Bermondsey Street conservation area, including its western spur into Vinegar Yard. That said, the tall building works hard to respond positively to its context and ease its impacts. The retention and remodelling of no.40 and matching replacement of no.42-44 as the tall building's base work well to maintain the streetscape within Bermondsey Street. The shoulder height and building frontages preserve the street's three-dimensional built form and architecture of robust, punched-hole brickwork elevations. The development also reintroduces the traditional-style service yard link, adding to the character and urban grain. It then looks to set back its tall building elements above parapet level, reducing its sense of scale onto Bermondsey Street. This works well to mitigate its impact in immediate views at the north end of Bermondsey Street.
149. In views from further south along Bermondsey Street, within the core of the conservation area, the building's high-rise form becomes more evident. The juxtaposition of scale is eased to an extent by the articulated form, with the high-level massing seen to cascade down onto Bermondsey Street rather than appear overbearing. The natural tones of the material cladding and inclusion of rooftop

planting also soften its appearance. Nonetheless, its appearance above the relatively consistent rooflines along Bermondsey Street does constitute a degree of harm however this would be at the lower end of less than substantial.

Image – View along Melior Street



150. In longer distance views along Bermondsey Street, it remains visible above the streetscape, although the impact becomes less pronounced as its form reads lower onto the existing roofline and its dark toned cladding allows it to blend more into the background. Importantly, other tall buildings, including the Shard and Guy's Tower break through the roofline, as will in time the consented schemes of Capital House and Becket House, lessening the impact (views #15-17). The building finally becomes obscured from view at the far end of Bermondsey Street and from within the churchyard grounds of St Mary Magdalene (view #14); while the other tall buildings within the London bridge area remain overt.
151. Elsewhere within the conservation area, the tall building will be seen rising directly above the Horseshoe Pub in the important townscape vista along Melior Street; its 11 storey sheer form reading as a large scale modern office building in the immediate backdrop. Whilst tempered by the material tones that blend with the brickwork of the foreground buildings, the contrast in scale remains evident, having a moderate effect (view #23). The view, however, is subject to change with the current construction of the taller Capital House and Becket House buildings that will significantly alter the wider context, lessening the effect to minor.



152. From Weston Street, the Bermondsey Street building's upper storeys will be evident above the intervening context, sitting above a relatively consistent streetscape (view #28) and similarly from Leathermarket Street when viewed across the public gardens (view #25), although the impact is or in time will be moderated by the appearance of other tall buildings, and as such the effect is minor. The limited harm caused is localised, with the tall building no longer appearing in the view from the north side of Leathermarket Gardens in Kirby Grove (view #26).
153. In terms of other conservation areas, the tall building will occasionally be visible from the Tower Bride Conservation and Tooley Street, albeit it will be seen at a distance and generally within the context of the substantial railway viaducts running into the mainline station (view #13) and wider backdrop of existing and emerging tall buildings within the London Bridge area (view #22). Its impact will therefore be neutral.

*Listed buildings and structures*

154. The area surrounding the application site includes a number of statutory listed buildings and structures, the closest being the Grade II listed railway viaduct opposite the site and the Grade II listed terraces within Bermondsey Street (no.55, nos. 59-63, nos.68-76 and 78, nos.124-130 and 132, nos. 187/189 and 191), and most notably the Grade II\* listed Church of St Mary Magdalen.
155. The closest listed building is the Grade II railway viaduct arches (1846) in Crucifix Lane (Charles Henry Driver, 18464-6), the special interests of which are as part of the history of the rapid expansion of railway infrastructure; its materials and craftsmanship; and its association with the Victorian civil engineer, Charles Henry Driver. The viewer's appreciation of the major railway infrastructure and its significance are unchanged by the proposed tall building opposite.
156. In terms of the listed buildings within Bermondsey Street, Grade II listed no. 55 and nos.59/61 and 63 are nearest, located 25m and 35m to the south and on the opposite side of the street. The former is a late 19<sup>th</sup> century tannery complex, with the 5-storey street building in stock brickwork with decorative stone and red brick details in the Gothic style and featuring a bay of hatch-rank doors. No.59/61 is an early to mid-19<sup>th</sup> century police station (Charles Reeves) over three storeys with basement in stock brickwork with rusticated openings and quoins in a classical style, whilst no.63 is three-storeys with additional attic floor and features a pedimented gable and decorative bas-reliefs. All the buildings have been adapted for offices and shops. Their special interest is derived from their history as part of the mid to late 19<sup>th</sup> century development of Bermondsey Street; their architecture and craftsmanship; but also their group value, forming a short stretch of attractive period buildings of generally similar, finer grain scale.
157. Regarding the development, whilst close by, its main impact is the brickwork facades of the altered no.40 and matching replacement no.42-44, which form the base of the tall building. In immediate views of the listed buildings from within Bermondsey Street or from its junction with Crucifix Lane/St Thomas Street, the

brickwork facades maintain the scale and character of the street, with the lower floors of the tall building above sufficiently set back behind the parapet line not to especially impose on the street or the settings of the listed buildings opposite. The uppermost floors are visible, but are articulated and step away, reducing their appearance. Overall, the impact on the viewer's appreciation of the listed buildings and their settings is minimal, preserving their significance.

158. Further south, on the west side of the street, nos.68 to 76 form an attractive group of five mid-18<sup>th</sup> century houses, adapted for shops with offices above. The terraced houses are varied in style, but share a fine-grained form and modest domestic scale and detailing in a simple classical manner. The 3-storey buildings are stucco with timber shopfronts, with no.68 notable for its partly curved façade and adjacent covered service yard entrance. In addition, no.78 abuts the group, but dates from earlier. The late 17<sup>th</sup> century terraced house is 4-storeys and shares the same fine grain form, stucco finish and timber shopfront, but its notable for its pedimented first floor projecting bay and overhanging top floor, which is finished in blue-painted weatherboard. The Grade II listed houses are rare survivors of the 17<sup>th</sup> and 18<sup>th</sup> centuries and reflective of the development of Bermondsey Street, and enjoy group value as an attractive terrace of period properties.
159. The visual impact of the proposed tall building on the settings of the Grade II listed terraced houses is illustrated in views #18 (Whites Grounds), #19 (Tyer's Gate) and #20 (Black Swan Yard). The verified views show how the brick facades of the tall building's base present onto Bermondsey Street maintain the general scale and character of the streetscape, blending comfortably with the nearby Grade II listed terrace. The upper floors of the tall building, however, are evident in the oblique views, rising above the context and disrupting the historic general roofline. The existing roofline is presently unencumbered in these views, with the parapets seen against sky. The tiered form, warm toned material finishes and planted terraces ease the impact, although the development nonetheless remains prominent. It reads above the terraced houses and the visual impact is dynamic and lessens in views from further south (view #18). Nonetheless, the impact results in some harm to the settings, particularly in close views although this harm would be less than substantial.
160. In terms of the other Grade II listed properties towards the bottom of Bermondsey Street (nos.124-130 and 132, nos. 187/189 and 191), the shift in alignment of the street, distance and intervening context would ensure that any appearance of the proposed tall building would be marginal and the impact negligible on their settings. This would also include the settings of the Grade II\* Church of St Mary Magdalen and its Grade II listed watch house, which are over 400m away from the proposed site. View #14 is a model shot, but illustrates how the tall building would be completely obscured by buildings in the backdrop to the church when viewed from its churchyard.
161. Lastly, view #27 shows the extent to which the tall building would be visible in the backdrop to the Grade II Leathermarket Exchange in Weston Street and neighbouring nos.15-17 Leathermarket Street (George Elkington, 1878). The

view shows that the upper elements of the tall building would be visible to one side of the Grade II listed properties, appearing briefly above the low-rise, TMO building at no.26 on the edge of Leathermarket Gardens. The tall building would read as a minor element, sufficiently remote in the backdrop, with its warm toned material finishes blending with the brickwork of the immediate context. The significance of the listed buildings and their settings would be unaffected.

*Other heritage assets*

162. The Vinegar Yard Warehouse and Horseshoe Inn are regarded by the Council as non-designated heritage assets (see policy NSP54 and the conservation area appraisal). The buildings are of local heritage importance, their architectural and historic interest greatly reinforcing the sense of local character and distinctiveness in the area. As NDHAs, the protection or enhancement of the significance of NDHAs, including their settings, is an important material consideration, albeit not as strong as that afforded to statutory designated heritage assets.
163. The proposals to restore the warehouse and bring it back into active use is therefore welcome in terms of preserving the building as a NDHA. As set out earlier, this would involve extensive external repairs to the historic brickwork and roofing; the refurbishment of external features, such as the existing crane and hatch-rank doors or replacement where they are beyond repair; and the reinstatement of missing features, including brick segmental arches, Portland stone cills and hatch rank doors on the north elevation. The windows are replaced throughout, taking the opportunity to unify the designs, using Crittal-style multi-pane framing that closely match the original fenestration, but also to install double-glazed units for enhanced thermal and acoustic performance.
164. Internally, the intention is to similarly restore the building's former appearance, retaining and refurbishing the cast-iron columns and primary beams or matching in suitable replacement elements. The secondary beams and flooring are referenced as being beyond sensible repair, given the extensive problems of water ingress, whilst their replacement allows the opportunity to improve fire safety. The new flooring appears to partly obscure the base of the cast iron columns, presumably to accommodate some services, although the extent of the floor build-up could be improved upon. The final design detail of this element will be secured by condition, to ensure that the extent of any obscuring of the base of the column is minimised and avoided if possible.
165. The part demolition of the south façade to allow the building envelope to open onto the new extension will result in the loss of some original fabric, although much of the elevation was rebuilt and altered following wartime damage. Moreover, the design premise is to locate all ancillary services within the extension, thereby preserving the open character of the warehouse floorplans and supporting its use as high quality offices. As stated earlier, the design for the extension as a distinct building is well conceived and the scale (height and form), positioning and material finishes remain sufficiently sympathetic to the host building. The alterations to the roof to create a rooftop garden are less

sympathetic, but do provide a valued office amenity, and retain the outer pitch and distinctive roof profile in full.

166. Overall, the interventions are considered acceptable and the approach to preserving the warehouse as greatly beneficial, particularly given its NDHA status. It is important that this restoration is carried out to a high standard for the design premise to succeed, and details for the façade repairs, including treatment of the painted signage adjacent to the hatch rank closest to Snowsfields, restored brickwork openings and replacement windows, hatch-ranks and doorways, the extent to which primary and secondary timbers within the building are retained, and the retention of internal pulley and lift mechanisms associated with the hatch ranks will all be required to be confirmed by condition.
167. Regarding the setting of the warehouse, historically it was one of a several similar scaled warehouses that clustered onto Vinegar Yard. This tight, fine-grained urban form has been lost through clearance and wartime bomb damage, with the warehouse left exposed onto St Thomas Street and Snowsfields. The extension will partly improve its setting, infilling the gap onto Snowsfields, whilst Vinegar Yard will be partly re-landscaped to provide an attractive forecourt area to the warehouse.
168. These improvements are set against the impact of the proposed tall building diagonally opposite the warehouse at no 40 and no.42-44 Bermondsey Street. The juxtaposition of scales will be evident, albeit partly eased by the intervening roadway and the retention of no.40 as a contextual brickwork base to the tall building. The NDHA would no longer be seen against a backdrop of buildings of a similar scale and sky. However, its special interest as a surviving warehouse of notable form would remain. Moreover, the new tall building would be one of several tall buildings emerging within the immediate context. Overall, given the changes in its settings over time, on balance, the impact of the new development is neutral.
169. Regarding the Horseshoe Inn, its special interest is partly its decorative, diminutive form and undoubted charm as a surviving, backstreet, traditional public house, but also in its attractive appearance, terminating the view along Melior Street. As referenced earlier, the proposed tall building will sit within the backdrop to this important local vista, appearing overbearing and detracting from the attractive streetscape. Arguably, the presence of the tall building serves to reinforce the pub's diminutive scale and back-street location, and in time, other consented tall buildings will emerge in the foreground, partly impinging on this view. Nonetheless, the vista is its primary setting and part of its special interest, and as such, the impact is of some harm but this would be at the lowest end of less than substantial.

### Landscaping, trees and urban greening

170. London Plan Policy G7 and Southwark Plan Policy P61 recognise the importance of retaining and planting new trees wherever possible within new developments, Policy G5 requires major development proposals 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 identifies a scoring system for measuring urban greening on a particular site (Urban Greening Factor) and suggests a target score of 0.3 for predominately commercial development.

171. With regards to trees, London Plan Policy G7 states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.
172. At the present time the site comprises mainly buildings, walkways and hard landscaping with a limited number of street trees. Therefore the opportunity exists for significant improvements to be made in terms of soft landscaping proposals and contribution towards urban greening.
173. Whilst it is noted that five trees would be removed to facilitate development, a total of 21 new trees would be provided within an improved landscaped public realm. Supplemented by planting on the roof terraces, the scheme would achieve an Urban greening Factor of 0.36 which exceeds the 0.3 and is welcomed.
174. The scheme includes a number of public realm benefits, most notably the new, characterful pedestrian route that links Bermondsey Street through to Snowfields; and a sizeable forecourt area onto Vinegar Yard. In addition, the scheme provides short stretches of widened pavement onto Snowfields. The proposals also include the upgrading of footways and the suggestion of raising the carriageway finish to within 25mm of the kerb along part of Snowfields. This effectively creates a single surface and the sense of a more generous public realm between the two new buildings, as well as enhancing the connection between the passageway.
175. The landscaping throughout comprises high quality natural stone, including decorative granite setts for the new pedestrian route. It includes the retention of a number of trees, replacement trees and new street trees, including onto Snowfields and Vinegar Yard, where they will help soften the streetscape. The palette is high quality, although the landscaping details (including tree species) should be conditioned.
176. Lastly, the new landscaping extends to high-level gardens and roof terraces above both buildings that provide welcome greening. The terraced gardens onto Bermondsey Street are notable for being extensive. The planting should bring attractive fringes to the building's parapets, as well as soften the townscape when viewed obliquely along Bermondsey Street. Overall, the landscaping and public realm are high quality and commensurate with the scale of development.

### Design Review Panel

177. The revised scheme was presented to the Council's Design Review Panel (DRP) in January 2022 at the pre-application stage. The panel welcomed the proposals, regarding it as an ambitious scheme that nonetheless responded well to the specific site conditions and the opportunity for a taller building on this site at the edge of the conservation area, where it formed part of the wider narrative of large buildings that cascade in height eastwards from the Shard to Bermondsey Street.
178. It supported the revised design strategy in general, which is considered was clear and worked well with the context. It highlighted the retention and refurbishment of the Vinegar Yard Warehouse without any upward extension as a strong advantage of the new proposals and supported its side extension as a distinct building and the use of the metal cladding, but thought the large roof terrace was too much for the historic warehouse. Regarding the tall building, it felt the elevational architecture of the base needed refining and the entrance to the pedestrian link made more legible. It supported the layered design of the upper floors and whilst it considered the overall massing was not uncomfortable, the panel questioned the proportional relationship between the base and articulated upper form.
179. The panel's concerns have largely been addressed by subsequent revisions to the scheme, with more of the warehouse roof retained; options reviewed for the elevational detailing of the tall building's base; the articulation of the upper floors further developed; and the high quality of material finishes embedded within the designs.

### Designing out crime

180. Policy D3 of the London Plan 2021 states that measures to design out crime should be integral to development proposals and be considered early in the design process. Developments should ensure good natural surveillance, clear sight lines, appropriate lighting, logical and well-used routes and a lack of potential hiding places. Policy P16 of the Southwark Plan 2022 reinforces this and states that development must provide clear and uniform signage that helps people move around and effective street lighting to illuminate the public realm. These issues are important consideration and the development would be required to achieve Secure By Design Accreditation. This would be a conditioned requirement of any consent issued, as recommended by the Metropolitan Police.

### Fire safety

181. A Fire Statement (dated July 2022) has been submitted to demonstrate compliance with the requirements of London Plan Policy D12. This policy requires developments to achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside space for appliances, incorporate features to reduce risk to life and injury in the event of a fire; designed and constructed in order to minimise the spread of a fire; and provide suitable and convenient means of escape for all building users.
182. The policy requires that the Fire Statement should include information in terms of the building's construction, means of escape for all users, fire suppression

features and measures that would reduce risk to life and injury. The strategy should also include details of how access would be provided for fire service personnel and equipment as well as provision for appliances to gain access to the building.

183. The submitted Fire Statement has been prepared in accordance with Policy D12 of the London Plan. The Fire Statement confirms that a sprinkler system will be used within the Bermondsey Street building and that this building will feature a phased evacuation strategy using firefighting lifts for the evacuation of the mobility impaired in the first phase and the use of two protected stair cores. The compartmentation fire resistance time for the Bermondsey Street building would be 120 minutes.
184. In the Vinegar yard Warehouse there would be a simultaneous evacuation strategy and occupants can use the firefighting lift to evacuate prior to the arrival of the Fire Brigade. The compartmentation fire resistance time for the Vinegar Yard Warehouse would be 90 minutes.
185. The Fire Statement also confirms that the buildings would be served by a fire detection and alarm system. The strategy also provides information on emergency power supplies, means of escape, smoke ventilation systems, firefighting lobbies, access for Fire Brigade and the competency of the strategy authors.
186. The GLA have requested additional information on the building's construction methods and rating of products and materials used, and the management of future alterations to the building as well as clarity on the evacuation of the mobility impaired and the combination of firefighting/evacuation lifts. These issues are being discussed between the applicant and the GLA and will be resolved prior to Stage II referral.
- 187.

### **Archaeology**

188. Whilst the scheme has been significantly revised in terms of its above ground scale, massing and detailed design, the overall footprint of the buildings is similar to the original scheme and the formation level of the basements currently proposed would be higher than the original scheme. As such, it is concluded that any below ground excavations are likely to result in archaeological effects occurring that are equivalent in nature and scale to those reported in the 2019 ES, and a detailed reassessment of archaeological effects is not required.
189. The site lies at an exceptionally interesting location within the 'Borough, Bermondsey and Rivers' Archaeological Priority Zone (APZ) and is extremely sensitive for archaeological matters. When the New Southwark Plan is adopted the site will lie within the newly extended 'North Southwark and Roman Roads ' Archaeological Priority Area (APA). Policy 23 of the Southwark Plan 2022 requires that proposals for development in APZ/As should be accompanied by an archaeological desk-based assessment (DBA) and an evaluation report (the results of digging archaeological trial trenches).
190. The site has been managed as two separate parcels of land with respect to archaeology, each having a different archaeological consultant and a different

team of archaeologists. The applicant has submitted separate desk based assessments, written schemes of investigation (WSIs) and pre-determination archaeological evaluation reports for each of the two site areas. Effects on the historic built environment have also been quantified in the ES Volume 2. The two project teams for the two sites have been in close consultation with Southwark's Archaeology Officer and each other. The larger Vinegar Yard and St Thomas Street site was managed by MillsWhipp Projects and the archaeological team were Pre-Construct Archaeology (PCA); they have submitted a Written Scheme of Investigation (WSI) by MillsWhipp Projects dated Oct 2018 and a Summary Report of the Evaluation Works at Vinegar Yard and St Thomas Street by PCA dated Nov 2018. At the 40 Bermondsey Street, 42-44 Bermondsey Street and 1-7 Snowfields the site was managed by ARUP and the archaeological team were Museum of London Archaeology (MoLA); they have submitted a WSI by MoLA, dated 9th November 2011 and a pre-determination evaluation report (including a Geoarchaeological Deposit Model report) by MoLA and dated January 2019.

191. As pre-determination evaluation has taken place on each parcel of land there is now sufficient information to make a planning assessment and determine whether this development is likely to cause harm to the buried historic environment and, if so, what measures need to be in place to manage this. Whilst the ES has categorised the impact of the development on buried heritage as slight adverse, it should be noted that following a programme of archaeological recording, the impact on buried archaeological remains would be minimised and less than significant.
192. The archaeological potential of the general area is evidently high, particularly with regard to medieval and post-medieval settlement and water management regimes - as well as the potential for prehistoric deposits, structures and finds. The sites have high potential for paleo-environmental remains and deposits dated from the earliest times. It is also possible that Roman deposits may survive within the alluvial sequence at depth. Links to the historic route of Bermondsey Street and nearby Bermondsey Abbey may also be present. The 16th century mansion of Henry Goodyere, a rich merchant, may have been partially discovered on the Vinegar Yard site. Subsequently, the area became a centre for post-medieval industries and warehouses, particularly relating to the tanning industry - with extensive archaeological remains surviving.
193. The application scheme includes basements and if this were consented the applicant must be mindful that all archaeological remains within the area of impact (as these cannot be preserved in situ through sympathetic design options) must be fully excavated.
194. There is now sufficient information to establish that the development is not likely to cause such harm as to justify refusal of planning permission on the grounds of archaeological interest provided that robust archaeological conditions are applied to any grant of consent. So, if the application scheme gains consent the applicant must be mindful that for any archaeological remains that are encountered - if these cannot be preserved in situ under a foundation design condition - they must be prepared to pay for and manage the excavation of these remains entirely and/or potentially lift and preserve off-site or in the new development any previously unknown but important remains. Other requirements will also be to carry out full archaeological post-excavation



mitigation, publication and deposition of the archaeological archive. Historic buildings on the sites should also be recorded to Historic England Level 3 standard.

195. In accordance with best practice as set out in current policy and guidance the applicant should consider opportunities for an appropriate programme of public engagement, for example: Historic England's 2015 publication 'Guidelines for Archaeological Projects in Greater London' provides advice on popular interpretation and presentation options. This can be provided for within the S106 Agreement.

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

196. The importance of protecting neighbouring amenity is set out Southwark Plan Policy P56 which states "Development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users". The adopted 2015 Technical Update to the Residential Design Standards SPD 2011 expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.
197. A development of the size and scale proposed will clearly have potential significant impacts on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site. The proposal has required an EIA in order to ascertain the likely associated environmental impacts and how these impacts can be mitigated. The 2019 ES and Addendum ES deal with the substantive environmental issues. An assessment then needs to be made as to whether the residual impacts, following mitigation, would amount to such significant harm as to justify the refusal of planning permission.

### Outlook and privacy

198. In order to prevent harmful overlooking, the Residential Design Standards SPD requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear. This distance is met between the Snowfields building and the adjacent residential building across Snowfields known as Raquel Court. The residential properties at 8-20 Snowfields are not directly opposite the Snowfields building or the extension, which would not have any directly opposing windows that would offer direct views into windows at 8-20 Snowfields.
199. As with the originally submitted scheme, these distances are not met on Bermondsey Street when considering the Bermondsey Street buildings and their relationship with the buildings on the east side of Bermondsey Street. This is as a result of retaining 40 Bermondsey Street and retaining the building line at 42-44 Bermondsey Street which is a character of the conservation area and would not result in any new viewpoints. Overall, the development is not considered to give rise to any unacceptable effects on amenity as a result of overlooking.
200. Both the Bermondsey Street building and the Vinegar Yard Warehouse incorporate terrace amenity spaces for the office occupiers. In order to safeguard amenity for adjacent residents it is recommended that a condition be imposed

restricting the hours of use of the terraces.

## Daylight

201. A daylight and sunlight report has been submitted as part of the Environmental Statement. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
202. The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within dense urban environments and areas of modern high rise buildings, a higher degree of obstruction may be unavoidable to match the height and proportion of existing buildings.
203. This area south of St Thomas Street and the redeveloped London Bridge Station has been identified as an area where tall buildings are appropriate and there are existing tall buildings in the area such as the Shard and Guys Hospital Tower as well as consented schemes at Capital House and Becket House which are within close proximity to the site. A tall building has a resolution for consent by the GLA and is currently in the final stages of S106 Agreement negotiation.
204. The BRE sets out the detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of their original value before the loss is noticeable. In terms of the ES, the level of impact on loss of VSC is quantified as follows;

Reduction in VSC	Level of impact
0-20%	Negligible
20.1-30%	Minor
30.1-40%	Moderate
40% +	Major

205. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of 20% in the area of sky visibility, daylight may be affected.
206. Whilst considered as part of the 2019 ES, a detailed re-assessment of the daylight, sunlight and overshadowing effects of the revised proposals is required on the basis that the changes in the size and design of the development are capable of changing the magnitude and consequent significance of those effects. The reassessment is set out in full in the Addendum ES and it should be noted that the baseline has been updated to take into account the consented and under construction Capital House development.
207. The ES considers the impact on the following neighbouring buildings:

- Bermondsey Village Hall
- 26 Melior Street, Horseshoe Pub
- 8-20 Snowsfields
- The Glasshouse, 2 Melior Place
- 4-31 Melior Street
- Globe House, 2a Crucifix Lane
- 147 Snowsfields, Raquel Court
- Hardwidge Street
- Snowsfields Primary School
- 1-114 Guinness Court
- 145-147 Guinness Court
- 115-144 Guinness Court
- 80 Weston Street
- 72 Weston Street
- 70 Weston Street
- 123 Snowsfields, The Rose Ph
- Nelson Recreation Ground, Guy Street, 115-122 Snowsfields
- 62-66 Weston Street, 38-43 Snowsfields
- Land Adjoining, 14 Melior Street
- Our Lady Of La Salette Church & Adjoining 14 Melior Street
- 52-54 Weston Street
- 48-50 Weston Street
- Wolfson House, 49 Weston Street
- 7-25 Bermondsey Street
- Land and buildings at Holyrood Street and Magdalen Street
- 2 Crucifix Lane
- 4 Crucifix Lane
- 6 Crucifix Lane
- 10-14 Crucifix Lane
- 16 Crucifix Lane
- 60-66 Whites Grounds Estate
- 67-91 Whites Grounds Estate
- 23-59 Whites Grounds Estate
- 1-22 Whites Grounds Estate
- 99-118 Whites Grounds Estate
- 79-83 Bermondsey Street
- 60 Bermondsey Street
- Tyers Estate
- 68-70 Bermondsey Street
- 72 Bermondsey Street
- 2 Carmarthen Place
- 4 Carmarthen Place
- Land to Rear Of 72-76 Bermondsey Street
- 74 Bermondsey Street
- 76 Bermondsey Street
- 78 Bermondsey Street
- 80 Bermondsey Street
- Part of 82-84 Bermondsey Street, 2 Tyers Gate
- 4-6 Tyers Gate
- 8 Tyers Gate
- 1 Tyers Gate

208. The daylight report has considered a large number of windows and rooms around the site. It assessed 2,388 windows serving 1,570 rooms across 51 properties for daylight amenity. Of the 2,388 windows assessed 2,318 (97%) would satisfy the BRE recommended levels for VSC. Of the 1,570 rooms assessed, 1,567 (98.4%) would meet the BRE standards for NSL. The following buildings would experience a negligible daylight impact as a result of the proposed development and as such are not considered further in this assessment.

- Bermondsey Village Hall
- 26 Melior Street, Horseshoe Pub
- The Glasshouse, 2 Melior Place
- 4-31 Melior Street
- 16 Hardwidge Street
- 1-114 Guinness Court
- 145-147 Guinness Court
- 115-144 Guinness Court
- 80 Weston Street
- 72 Weston Street
- 70 Weston Street
- 123 Snowsfields, The Rose Ph
- Nelson Recreation Ground, Guy Street, 115-122 Snowsfields
- 62-66 Weston Street, 38-43 Snowsfields
- Land Adjoining, 14 Melior Street
- Our Lady Of La Salette Church & Adjoining 14 Melior Street
- 52-54 Weston Street
- 48-50 Weston Street
- Wolfson House, 49 Weston Street
- 7-25 Bermondsey Street
- Land and buildings at Holyrood Street and Magdalen Street
- 2 Crucifix Lane
- 4 Crucifix Lane
- 6 Crucifix Lane
- 10-14 Crucifix Lane
- 16 Crucifix Lane
- 60-66 Whites Grounds Estate
- 67-91 Whites Grounds Estate
- 23-59 Whites Grounds Estate
- 1-22 Whites Grounds Estate
- 99-118 Whites Grounds Estate
- 79-83 Bermondsey Street
- 60 Bermondsey Street
- 68-70 Bermondsey Street
- 72 Bermondsey Street
- 4 Carmarthen Place
- Land to Rear Of 72-76 Bermondsey Street
- 74 Bermondsey Street
- 76 Bermondsey Street
- 78 Bermondsey Street
- 80 Bermondsey Street
- Part of 82-84 Bermondsey Street, 2 Tyers Gate
- 4-6 Tyers Gate
- 8 Tyers Gate

- 1 Tyers Gate

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

Table – Existing V. Proposed VSC

Property	No. of windows tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of between 20%-29.9% reduction in VSC	No. with moderate adverse impact of between 30%-39.9% reduction in VSC	No. with major adverse impact of over 40% reduction in VSC
8-20 Snowsfields	74	70	1	0	3
Globe House, 2A Crucifix lane	38	19	0	5	14
147 Snowsfields, Raquel Court	56	44	12	0	0
Snowsfields Primary School	96	94	0	1	1
Tyers Estate	168	137	17	0	14
2 Carmarthen Place	16	14	2	0	0

Table – Existing V Proposed NSL

Property	No. of rooms tested	No. retaining at least 80% of their baseline value	No. with minor adverse impact of between 20%-29.9% reduction in NSL	No. with moderate adverse impact of between 30%-39.9% reduction in NSL	No. with major adverse impact of over 40% reduction in NSL
8-20 Snowsfields	63	60	0	0	3
Globe House, 2A Crucifix lane	13	9	1	0	3
147 Snowsfields, Raquel Court	30	30	0	0	0
Snowsfields Primary School	60	60	0	0	0
Tyers Estate	134	115	11	5	3
2 Carmarthen Place	6	6	0	0	0

#### *8-20 Snowsfields*

210. A total of 74 windows serving 63 rooms have been assessed for VSC and NSL at this property. A total of 70 of the 74 windows would remain compliant for VSC whilst 60 of the 63 rooms would remain compliant for NSL. The four rooms that

would experience losses of VSC one would experience a loss of 29.2% which would be categorised as a minor effect in the ES. Additionally, it should be noted that the room this window serves would remain compliant for NSL. The windows serving the three remaining rooms would all experience major adverse (significant) changes in VSC with losses of between 62.70% and 65.03%. The rooms served by these windows would also experience major adverse (significant) changes in NSL. However, these rooms do not appear to be principal living accommodation and as such the reductions would not have significant amenity impacts. The effect on this property is considered to be moderate adverse and the impact is considered acceptable.

*Globe House, 2A Crucifix Lane*

211. A total of 38 windows serving 13 rooms have been assessed for VSC and NSL at this property. Of the 38 windows assessed for VSC, 19 would remain compliant with the BRE, five would experience moderate loss of VSC of between 30-39.9% and 14 would experience major loss of VSC in excess of 40%.
212. The five windows experiencing moderate losses of VSC all serve rooms that benefit from several other unaffected windows. The 14 windows that would experience major loss of VSC in excess of 40% all appear to serve bedrooms based on information available on the planning register. The BRE recognises bedrooms as being less sensitive to daylight changes. Additionally, it should be noted that nine of these windows would retain at least 15% VSC.
213. Of the four rooms experiencing noticeable losses of NSL, one room would experience a minor loss of 21.3% whilst the remaining three rooms would experience loss of between 51.7%-55.6% NSL. In all four cases the room type appears to be a bedroom which as set out above, are less sensitive to daylight changes than principal living accommodation. Overall the effect on this property is considered to be moderate adverse and the impact is considered acceptable given the room use and the mitigating circumstances around unaffected windows serving the same rooms.

*147 Snowfields/Raquel Court*

214. All 30 rooms assessed for NSL at this property would remain fully compliant with the BRE. Of the 56 windows tested for VSC, 44 would remain compliant with the BRE and the remaining 12 would see minor effects as a result of VSC losses of between 20.78% and 27.38% however in all cases, windows would retain at least 20% VSC which is a comparable level of VSC for an urban location. The effect on this property is therefore minor.

*Snowfields Primary School*

215. All 60 rooms assessed for NSL at Snowfields Primary School would remain fully compliant with the BRE. Of the 96 windows tested for VSC, 94 would remain compliant with the remaining two windows experiencing a moderate (30-39.9% reduction) and major reduction (in excess of 40%). These windows have very low baseline VSC values and so the small 0.32% and 2.03% actual VSC changes to these windows present themselves disproportionately in percentage terms. It should also be noted that these two windows serve a room that benefits from two

additional windows that would remain BRE compliant in terms of VSC and the room would remain BRE compliant in terms of NSL. The effect on this property is therefore considered to be minor.

#### *Tyers Estate*

216. A total of 168 windows across these buildings have been assessed for VSC and 137 would remain fully compliant. Minor reductions of between 20.61% and 28.49% would be experienced at 17 windows. The remaining 14 windows would see major reductions in VSC of between 47.06% and 79.22%. However, these windows have low baseline VSC levels and the actual real terms loss of VSC ranges from 1.2% to 4.44%
217. NSL was assessed at 134 rooms and 155 would remain compliant. Of the remaining 19 rooms, 11 would see minor reductions, five would see moderate reductions and three would see major reductions. Taken together with the VSC results, the overall effect on the Tyers Estate is moderate adverse.

#### *2 Carmarthen Place*

218. All six rooms assessed for NSL at this property remain BRE compliant. Of the 16 windows assessed for VSC, 14 windows would remain BRE compliant whilst two windows would see minor reductions of 21.29 and 25.91%. The effect on this property is considered to be minor.

#### Cumulative daylight impacts

219. The applicant has considered cumulative daylight impacts in the Addendum ES taking into account a future baseline that includes nearby consented schemes and this is presented in Appendix G of the Addendum ES. As before, the daylight assessment considered windows and rooms within the vicinity of the site with the daylight impacts summarised below:

Property	Significance of Cumulative Effect
8-20 Snowfields	Moderate adverse
4-31 Melior Street	Minor adverse
Globe House, 2A Crucifix Lane	Moderate adverse
147 Snowfields	Minor adverse
Snowfields Primary School	Minor adverse
Tyers Estate	Moderate adverse

220. With the exception of 4-31 Melior Street, the cumulative effect on the remaining properties would be in the same category as the existing versus proposed scenario. 4-31 Melior Street would experience negligible effects under the existing versus proposed scenario but moves to a minor adverse effect under the cumulative scenario.
221. A total of 70 rooms were assessed for NSL at 4-31 Melior Street under the cumulative scenario and all 70 rooms would remain BRE compliant. In terms of VSC, 148 windows were assessed and 139 would remain BRE compliant. Of the remaining nine windows, eight would see minor VSC reductions of between 20%-29.9% loss and one window would see a moderate VSC reduction of between

30%-39.9%. In all cases the affected windows serve rooms that benefit from other windows that would remain BRE compliant in terms of VSC.

### Sunlight

222. All of the windows within 90 degrees of due south have been assessed with regards to impact on sunlight. The BRE guide states that if a window can receive 25% of summer sunlight, including at least 5% of winter sunlight between the hours of 21 September and 21 March, then the room would be adequately sunlight.
223. In terms of sunlight, 737 residential (or similar use) across 43 properties have been assessed for sunlight amenity both in terms of total Annual Probable Sunlight Hours (APSH) and Winter APSH.
224. Of the 737 rooms that have been assessed for sunlight, 732 would remain BRE compliant (99.3%). The remaining 5 windows would experience some sunlight reductions. All of these windows are located at Globe House, 2A Crucifix Lane.
225. Five out of the 10 rooms assessed for sunlight amenity at this property would remain compliant with the BRE. The remaining five rooms would experience reductions in both winter and annual sunlight. Four of these rooms are bedrooms and would retain absolute levels of winter sunlight of between 7% and 9% against the BRE recommended target of 5%, and absolute levels of annual sunlight of between 21% and 23% against a BRE recommended target of 25%. The remaining room is a living room which would retain an absolute level of winter sunlight of 4% against the BRE recommended target of 5%, and an absolute level of annual sunlight of 24% against a BRE recommended target of 25%.
226. The retained sunlight levels are acceptable given the urbanized location and the fact that the divergence from the target levels is minor. Overall the effect on this property is considered to minor.

### Cumulative sunlight impacts

227. Under the cumulative scenario, 752 residential (or similar use) across 44 properties have been assessed for sunlight amenity both in terms of total Annual Probable Sunlight Hours (APSH) and Winter APSH. Of the 752 rooms that have been assessed for sunlight, 747 would remain BRE compliant (99.3%). The remaining 5 windows would experience some sunlight reductions. All of these windows are located at Globe House, 2A Crucifix Lane. The impacts would be the same as set out previously for this property and would be considered minor.

### Overshadowing of amenity spaces

228. The Addendum ES has also considered overshadowing of amenity spaces as a result of the revised proposals. Amenity spaces at The Horseshoe Inn and the pocket park on Melior Street/Fenning Street have been considered. The results are presented in the table below:

Amenity Space	Baseline (% of area)	Proposed (% of area)	% change between	Scale of Effect as categorised
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	receiving two hours of sun on the 21 <sup>st</sup> March)	receiving two hours of sun on the 21 <sup>st</sup> March)	Baseline condition and completed development	by the ES
Horseshoe Inn Garden	41.6%	36.5%	12.3%	Negligible
Pocket Park Melior Street/Fenning Street	57.6%	56.6%	1.7%	Negligible.

229. The reductions are within the scope of the BRE which recommends a maximum reduction of 20%. In both cases the results are an improvement on the original scheme.
230. Overshadowing of amenity spaces has also been considered in the cumulative scenario. This considers the Horseshoe Inn as before as well as the amenity spaces proposed/consented at Vinegar Yard and Becket House.

Amenity Space	Baseline (% of area receiving two hours of sun on the 21 <sup>st</sup> March)	Proposed (% of area receiving two hours of sun on the 21 <sup>st</sup> March)	% change between Baseline condition and completed development	Scale of Effect as categorised by the ES
Horseshoe Inn Garden	40.3%	36.1%	10.4%	Negligible
Vinegar Yard	57.6%	29.7%	69.2%	Moderate.
Becket House	27.8%	27.1%	2.5%	Negligible.

231. The sun on ground assessment for the amenity spaces of the Vinegar Yard development shows a reduction of area achieving at least two hours of sunshine on 21 March from 96.4% to 29.7%. This represents a reduction of 69.2% against a recommended maximum of 20%. This level of sun on ground reduction on 21 March suggests that the cumulative overshadowing effect of the revised proposals to this area is major adverse.
232. By the 21 June however, the sun on ground assessment results demonstrate that during the summer months, when this area is most likely to be used for sitting out, the whole area (100%) will be able to benefit from at least two hours of sun on the ground. The overall cumulative overshadowing effect to this area is, therefore, considered to be no greater than moderate.

### Light pollution

233. The 2019 ES and the updated Addendum ES demonstrate pre and post curfew effects would be negligible or minor with the exception of the first to third floor of residential properties at 1-12 Tyers Estate whereby there could be light pollution that would be categorised as moderate in effect. The applicant is proposing mitigation for post curfew period in the form of a building management system that would have control of integrated blackout blinds. Officers consider that this mitigation could be employed on the lower levels of the building adjacent to 1-12 Tyers Estate at an earlier hour than the curfew in order to mitigate the potential

impacts in terms of light pollution. The relevant condition would be imposed on any consent issued.

### Conclusion on daylight and sunlight

234. The daylight and sunlight assessment presented as part of the ES demonstrates that there would be several windows that would see noticeable losses of VSC and rooms that would see noticeable losses of NSL beyond the BRE guidelines.
235. Developing sites in highly urbanised environments often results in some unavoidable impacts to daylight and sunlight. Recognising the challenges associated with developing inner city sites, the numerical targets given in the BRE are expected to be treated with a degree of flexibility, having due regard for the existing and emerging context within which these sites are located. The application site is within a Central London Opportunity Area and accordingly the standards should be applied with some degree of flexibility.
236. The results of the daylight assessment demonstrate that there would be a limited impact on daylight and sunlight to surrounding properties as a result of the proposed development. The overall BRE compliance rate for VSC and NSL would be 97% and 98.4% respectively. In terms of sunlight, there would be a compliance rate of 99.3% which is positive. Whilst adverse daylight impacts have been identified at some properties they are not considered to be significantly adverse, would generally not impact upon principle living accommodation and would not detrimentally harm residential amenity or room functionality.
237. Given the small number of windows overall that would experience significant effects and the site specific circumstances set out above including the nature of the affected rooms and windows, it is considered that the overall impact would be acceptable given the benefits of the proposed development in redeveloping a currently under-used site, the provision of a significant new public realm, offices, retail, significant employment opportunities and the full refurbishment and meaningful re-use of the Vinegar Yard Warehouse. On balance, officers consider that, when reading the BRE guidance with the required flexibility, and in view of the positive benefits of the development proposal, the degree of harm to amenity would not justify withholding planning permission in this case.

### Solar glare

238. Solar glare has been considered as part of the 2019 ES and the Addendum ES. Various car/train driving viewpoints have been considered. The viewpoints set out below are considered to experience a minor solar glare effect and as such are considered acceptable.
1. Junction of Crucifix lane, St Thomas Street, Bermondsey Street and Snowsfields;
  2. Junction of Hardwidge Street with Snowsfields;
  3. Junction of Kirby Grove with Snowsfields and Melior Place;
  4. Junction of Guinness Court with Snowsfields;
  6. Raised Viaduct train track
239. In terms of the remaining viewpoint, viewpoint 5 travelling east on Melior Street,

the impact would also be limited to minor adverse as the potential for glare is limited to between five and ten minutes at 4pm each day in late January/early February and at 4:30pm in late October/early November. Additionally the potential for glare to occur is relatively high up on the building and would not impair the driver's vision of traffic signals or pedestrian crossings.

## **Transport and highways**

240. Chapter 9 of the NPPF seeks to ensure that transport issues are properly addressed as part of development proposals. Proposals must assess the impact upon existing transport networks, promote and maximise opportunities for sustainable transport modes whilst mitigating any adverse transport related environmental effects and must make a significant contribution to improving accessible movement and permeability as a key priority for place making. Paragraph 111 states "development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe".
241. This approach is reflected in Chapter 10 of the London Plan and Southwark Plan Policies P49 – P55, which require development proposals to maximise sustainable modes of transport by minimising car journeys, to deliver enhanced walking and cycling opportunities and safe, accessible routes to public transport. Developments should be car free save for disabled parking provision and mitigation will be secured where necessary to address impacts upon the road and public transport networks to serve new developments
242. This application was accompanied by a Transport Assessment. The documents have been reviewed by the Council's Transport Policy and Highways Teams, and Transport for London (TfL).

### Site context

243. The application site boundaries are marked by St Thomas Street to the north; Bermondsey Street to the east; and Snowfields which divides the site into east and west sectors. St Thomas Street forms part of the Transport for London Road Network (TLRN).
244. London Bridge Station is the nearest train and underground station to the site, located approximately 200m to the west along St Thomas Street. Various buses run along nearby roads including Tooley Street, Crucifix lane, St Thomas Street and Borough High Street. Given the multiple public transport options available in close proximity to the site the PTAL rating is 6B, indicating an excellent level of provision. In addition to public transport, the site is served by the cycle hire scheme with docking stations located on Snowfields, Potters Fields Road and Tanner Street
245. The site is well located for cycling with Cycle Superhighway 3 and 7 located close by at Monument and Southwark Bridge Road respectively. A new Cycle Superhighway between Tower Bridge and Greenwich is expected to run close to the site and there are hopes that this could be extended westwards to London Bridge Station along Tooley Street.

## Site layout

246. The site has a simple and rational layout that is delineated by the existing streets and pavements. The Bermondsey Street building retains the existing building line and provides a new pedestrian route linking Bermondsey Street with Snowfields. A loading bay is provided off-street within the Bermondsey Street building and this is accessed from Snowfields. This would provide off-street servicing for the Bermondsey Street building.

Image – connectivity and integration



247. The Vinegar Yard Warehouse (retained) would be supplemented by a new extension that would have a frontage onto Snowfields. Servicing and deliveries for the Vinegar Yard building will take place from a proposed loading bay to the north west of the site, which would be accessed from Snowfields.

## Trip generation

248. The Council's Transport Officer has undertaken an independent review of trip generation for the site using the TRICS database. The use of TRICS is supported by TfL. The Transport Officer, using TRICS, has demonstrated that the development would produce approximately six and eight two-way net additional vehicle movements in the morning and evening peak hours respectively. This level of trip generation would not have any noticeable impact on the transport network.
249. In terms of impacts on public transport, the applicant's consultants have also forecasted that this proposed development would produce around 508 two-way public transport trips in the morning or evening peak hours and 37 two-way delivery vehicle movements per day, figures which are deemed reasonable. Contributions towards public transport improvements are sought. A Travel Plan would be secured as part of the S106 agreement.

## Servicing and deliveries

250. The delivery and servicing burden of the proposed building is low. It is proposed that the Vinegar Yard Warehouse be serviced from the on-street bay to the north west of the site in line with local restrictions. Given the size of the Vinegar Yard Warehouse and the lower servicing needs of this building, this approach is considered appropriate.
251. The Bermondsey Street building would be serviced off-street via an eight metre

loading bay that would be accessed from Snowfields and would align with the proposal on the original scheme. The proposed servicing arrangements for both buildings are considered acceptable and would minimise impacts on the highway.

### Refuse storage arrangements

252. Refuse would be stored within dedicated bin stores within the basement level of each building. On waste collection days, the Facilities Management team will transport the bins from the basement waste store in the Bermondsey Street building to the collection point in the loading bay via the goods lifts. For the Bermondsey Street building, waste collection vehicles will be able to use the loading bay within the service yard to access the waste collection area. With regards to the Vinegar Yard Warehouse, on waste collection days, the facilities management team will transport the bins from the basement waste store to ground floor level via the goods lift. The facilities management team will rotate the bins as they are collected from the basement waste store to the collection vehicle to ensure that waste bins are not left on the street. This would be secured by condition.

### Healthy Streets

253. London Plan Policy T2 requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. The development provides the opportunity to greatly improve the pedestrian environment, improving the street level experience, improving pedestrian connectivity and legibility, promoting sustainable forms of transport and the use of public transport modes and the provision of a new pedestrian route and improved pavements.
254. This development would be car free save for a single accessible car parking space thus promoting walking, cycling and use of public transport. Contributions have been secured for sustainable transport modes to accommodate the demand created by future occupiers of the site. Public realm improvements have been integral to the design of the scheme and new pedestrian routes linking Bermondsey Street and Snowfields would be provided. The development seeks to significantly enhance biodiversity through the new landscaped public space next to the Vinegar Yard Warehouse which, together with the future Vinegar Yard development, will offer opportunities to improve local biodiversity. on Duke Street Hill and seeks to improve air quality. The scheme has been designed to minimise air pollution as much as possible and would be air quality neutral.

### Car parking

255. London Plan Policy T6 seeks to encourage car free and car limited development as much as possible and sets maximum car parking standards for different uses whilst recognising the need for an appropriate provision of disabled parking and adequate arrangements for servicing. Non-residential uses should provide a minimum of one disabled space. All car parking spaces must be fitted with electric vehicle charging points. Southwark Plan Policies P54 and P55 set out

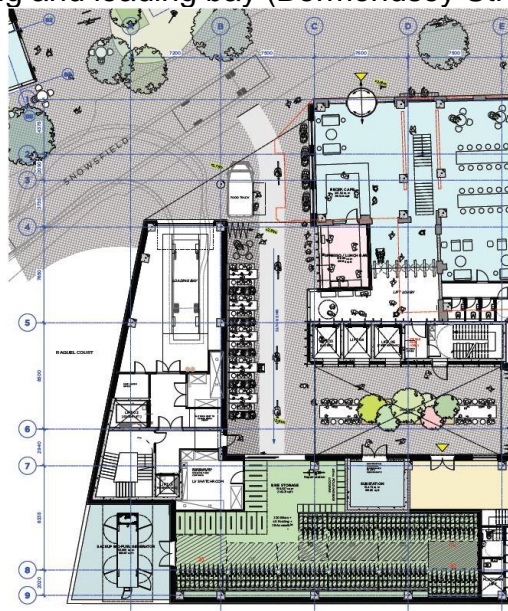
car parking standards for various land uses and echo the requirements of the London Plan in terms of setting maximum car parking standards and promoting car free development save for minimum disabled provision.

256. The development is proposed to be 'car free' with the exception of one accessible car parking space which must be equipped with electric vehicle charging facilities. This provision is in line with development plan policies and should be secured by conditions.

### Cycle parking and cycling facilities

257. 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.

Image – Cycle parking and loading bay (Bermondsey Street building)



258. Under Southwark Plan policy, the development would be required to provide 352 long stay spaces and 67 short stay spaces. The revised proposals would provide 364 long stay spaces and 71 short stay spaces, thereby exceeding the minimum policy requirement of the Southwark Plan. This is welcomed and a condition would be imposed on any consent issued to finalise the details of the cycle parking in order to ensure provision of spaces for cargo bikes and to secure details of cycle facilities such as showers, changing rooms and repair spaces.
259. In line with comments from TfL, a financial contribution of £100,000 should be secured in order to provide funding to expand cycle hire facilities in the area by approximately 15 spaces. Provision will be made for this in the S106 agreement.

## **Environmental matters**

### Ecology

260. The applicant submitted a Preliminary Ecological Appraisal with the originally submitted scheme and this has been supplemented by an additional Bat Survey

Report for the revised proposals. The Council's Ecologist has been consulted on both documents and both sets of plans and has concluded that they are suitable for assessing the impact of the development on local ecology. The report concludes that there would be no adverse ecological impacts and in order to provide ecological enhancement the Council's Ecologist has recommended conditions relating to the provision of biodiverse roofs and the installation of Swift bricks. The relevant conditions would be attached to any consent issued.

### Water resources and flood risk

261. The water resources subject area was considered as part of the 2019 ES and the applicant submitted a Flood Risk Assessment (FRA) and a Drainage Strategy in support of the application. No significant effects were identified as part of the 2019 ES. The site is located within Flood Zone 3 which is considered to be an area of high risk of flooding due to the proximity of the tidal River Thames. However the site is protected by the Thames Barrier and related defences. The proposed development does not include any residential accommodation and all of the proposed uses are classified as "less vulnerable" and as such are acceptable within Flood Zone 3a. The Environment Agency were consulted on both the original proposal and the revised proposal and have raised no objections to either.
262. The Addendum ES has considered the need to re-assess water resources due to the proposed changes to the design and scale of the development and how it would interact with flood risk and drainage.
263. The Addendum ES has assessed construction effects, existence effects and operational effects on water resources. Beginning with construction effects, the Addendum ES considered the following:
- Surface water flood risk due to temporary changes to the water network;
  - Surface water runoff volume and quality; and
  - Ground water.
264. No significant effects have been identified and no additional mitigation is proposed or warranted. In terms of existence effects, the Addendum ES has considered the following:
- Surface water flood risk and drainage
  - Groundwater
265. Whilst no significant effects have been identified and no additional mitigation is proposed or warranted, it should be noted that there is the potential for a major beneficial residual effect. This results from the fact that the surface water drainage strategy would ensure that peak flows from the revised proposal rates are 3l/s. With the Bermondsey Street site providing a 94% betterment on existing conditions and the Vinegar Yard Warehouse site an 89% betterment for the 1 in 100 year + 40% climate change event. This would result in a negligible impact on surface water flood risk and a major beneficial effect on surface water drainage.
266. Foul water drainage and potable water supply were assessed for operational

effects on water resources and no significant effects were identified. It should also be noted that no cumulative effects have been identified.

### Sustainable urban drainage

267. The applicant has developed a SUDS strategy for the site that incorporates the use of eight separate blue roof systems across the terraces of the Bermondsey Street building at levels four, six, eight, ten and 11, as well as roof level. This would be a 94% betterment on existing runoff rates. On the Vinegar Warehouse site, rainwater will be attenuated by a blue/green roof located on the terrace at Level four with the remaining area being attenuated through a combination of permeable paving and soft landscaping. This would be an 89% betterment in comparison to existing surface water runoff rates.

### Land contamination

268. Ground conditions were assessed as part of the original 2019 ES. Whilst the revised scheme is different to the originally submitted scheme in terms of above ground works, the footprint is similar and the formation level of the proposed basements is at a higher level than that previously proposed. As such, below ground excavations are likely to result in effects as reported in the 2019 ES, and a detailed reassessment of ground conditions and contamination effects is not required as a result of the revised scheme.
269. The 2019 ES considered ground conditions through the following:
- A desk-based detailed review to identify potential sources of contamination on or surrounding the site;
  - Assessment of the potential for contamination based on the baseline conditions
  - A risk-based ground contamination assessment considering potential sources, receptors and pollutant linkages in line with Government guidance;
  - Consideration of mitigation measures to address any adverse impacts.
270. The ES concludes that there would be no significant effects however it does note that there may be significant effects if asbestos is found in the soil. This would be identified early in the development programme through soil contamination studies and appropriate remediation would need to be put in place should asbestos be found. The Council's Environmental Protection Team previously reviewed the information and considered it acceptable subject to standard conditions around land contamination, soil sampling and remediation measures that will ensure there would be no adverse impacts resulting from the proposed development in terms of ground conditions.

### Air quality

271. Air quality was assessed as part of the 2019 ES and it is concluded that no detailed re-assessment of air quality is required as part of the revised proposals as there would be no material change. The scope of the 2019 ES air quality assessment was based on construction traffic and combustion sources. The



proposed development is significantly reduced in quantum from the originally submitted scheme and as such the construction related traffic would either be equal to or lower than the previous proposal. As such the results and conclusions of the 2019 ES remain valid in terms of air quality.

272. The 2019 ES concluded that during the demolition and construction phase, it is recognised that there would be impacts such as dust in the air as well as dust and dirt on the highway as a result of construction vehicle movements. This can be suitably managed and mitigated through a Construction Environmental Management Plan which would be a conditioned requirement of any consent issued. The impact of construction vehicle traffic emissions is not considered to be significant.
273. An Air Quality Neutral Assessment was prepared for the 2019 ES and this has been updated to take into account the revised proposals and the result shows that the revised proposals have been determined to be air quality neutral. A sensitivity test has been undertaken for the air quality neutral assessment based on the latest consultation draft guidance. For building emissions, the proposal only includes a backup generator to be used in emergencies and has been excluded from the emissions calculator in line with guidance. As such, building emissions for the revised scheme do not need to be reviewed further as the emergency generator would be the only source of combustibles on site. Transport emissions have also been determined to be air quality neutral following the latest consultation draft guidance.

## Wind

274. Wind and microclimate impacts have been fully assessed as part of the 2019 ES. This assessment included taking readings of predicted wind levels at various points around the site and the surrounding area and considering if the climatic conditions would be suitable for the predicted use, utilising wind tunnel testing.
275. The ES addendum considers the need for wind and microclimate to be reassessed and it is concluded that a desk based reassessment is appropriate given the scheme changes in terms of articulation, massing and height. The addendum notes the elements of the revised proposal that are relevant to the reassessment as being:
- Building 1 (Bermondsey Street), comprises 11 storeys above ground and extends to a maximum height of 47.5m above ground level. The massing articulation includes steps at levels 4, 6, 8 and 11 on the northern and north-eastern facades. The maximum height of Building 1 has been marginally increased as compared to the originally submitted scheme of four to nine storeys above ground (21.3m to 42.1m above ground level).
  - Building 2 (Vinegar Yard Warehouse) comprises 5 storeys above ground and extends to a maximum height of 23.5m above ground level. The height of Building 2 has been significantly reduced as compared to the originally submitted scheme of 16 storeys (64.3m above ground level).
  - The height and position of trees within the Site boundary remains broadly consistent with the proposals that were developed for the previous scheme design.

- The massing and location of cumulative surroundings within a radius of 400m from the centre of the site remains broadly similar to that tested in 2019.
276. Given the scope of the changes outlined above, the wind and microclimate conditions generated by the revised proposal are considered to remain similar to or improve on those set out in the 2019 ES. The existing versus proposed and cumulative assessment in the 2019 ES concludes that the wind conditions at the assessed points would be suitable for their intended use. This included walking conditions on Bermondsey Street, Snowfields and the new passage linking the two as well as walking/standing and sitting conditions around the new Snowfields building and public realm. The proposed environmental conditions would rely on appropriate mitigation such as tree planting and as such this would have been a conditioned requirement of any consent issued on the original submission alongside a Wind Mitigation Strategy in order to ensure that the predicted wind conditions are achieved.
277. As part of the Addendum ES, a desk study assessment has been undertaken on the revised proposals. This study was based on the revised drawings as well as the wind tunnel studies from the 2019 ES and the wind tunnel results from the Vinegar Yard development as well.
278. The proposed step arrangement on Building 1 is anticipated to help mitigate the effects of 'downrafting' from north easterly winds. Building 2 has been significantly reduced in height from 16 storeys to five and this is expected to have a beneficial impact on wind levels on Snowfields where funnelling effects from south westerly winds are expected to be less significant than in the 2019 scheme. Conditions are considered to be suitable for the intended use at assessed locations and additional mitigation is only required in two locations.
279. Location one is the new Bermondsey Yards thoroughfare where 'Standing' to 'Strolling' may be anticipated within the north end of the passage in the 'worst season', with 'Standing' in the summer. A significant effect may be expected however additional mitigation would be implemented in the form of a perimeter screen around the proposed seating areas within the north end of the passageway. No significant residual effects are anticipated.
280. Location two is the primary entrance to Building 2 where by 'Strolling' conditions may be anticipated in the worst season which is in excess of the acceptable limits for the intended use. Additional mitigation in the form of recessing the entrance by at least one metre and using inward opening doors is proposed. There would be no significant residual effects.
281. The desk study assessment has identified the potential for significant cumulative effects when considering the 2019 scheme in addition to the Vinegar Yard scheme however this was suitably mitigated by proposed tree planting. Wind tunnel testing as undertaken for the originally submitted scheme also demonstrated that wind conditions on Snowfields (and other areas) remain acceptable for intended uses in the presence of Vinegar Yard.
282. The revised proposals are of a significantly reduced scale and the wind levels are expected to remain similar to previously reported levels or improved. Further

wind tunnel testing has been undertaken in support of the Vinegar Yard development which supports the above findings. As such it is not anticipated that there would be any significant cumulative effects.

### Noise and vibration

283. Noise and vibration impacts have been considered as part of the 2019 ES which considers the key considerations to be noise and vibration effects from demolition and construction as well as associated traffic during this period. As with the originally proposed scheme, the scope of noise and vibration effects would be limited to construction noise effects. The construction methodology for the revised scheme is expected to be broadly the same, resulting in effects as originally reported in the 2019 ES. As such it is concluded that a detailed re-assessment of noise and vibration effects is not required.
284. Demolition and construction activities including associated traffic would give rise to some environmental impacts at nearby homes, commercial premises and Snowsfields Primary School. These impacts are associated with the demolition and construction of the development and whilst they would be significant and adverse, they would be short term and temporary and relevant planning conditions would be imposed to offer mitigation and control hours of work as well as agreeing routes for construction vehicles.
285. The completed development is unlikely to result in any adverse noise or vibration impacts and other than standard conditions around hours of use and plant noise, no further mitigation would be required.

### Climate change

286. Whilst considered as part of the 2019 ES, a detailed re-assessment of the climate change effects is required due to the changes to the design and the adoption of new guidance for the assessment of Greenhouse Gas (GHG) emissions in EIA.
287. The impact of the development on Climate Change looks at both construction and existence/operational effects. The ES notes that there would be a net increase in emissions associated with the proposed development. This is typical for all large developments and is a result of the energy (and resulting greenhouse gas emissions) going into the new materials and transporting those materials to site, as well as any energy associated with construction activities and later operation of the development. These are all unavoidable requirements, however they have been minimised where possible through consolidation and sourcing materials sustainably where feasible.
288. The assessment considers the schemes embedded mitigation in the form of the Whole Life Carbon assessment and the key mitigation measures contained therein; the Circular Economy Statement and the waste hierarchy and recycling opportunities; the Energy Statement setting out the overall carbon reduction strategy for the development; and the Sustainability Statement that promotes low carbon mobility.
289. Guidance from the Institute of Environmental Management and Assessment states that any net emissions increase associated with a project, no matter how

small, is considered a significant effect. Hence the conclusion in the ES. This conclusion therefore recognises the seriousness of the climate emergency rather than the development being a relatively large source of greenhouse gas emissions. As noted above, measures have been taken and will continue to be taken to reduce emissions associated with the project and to minimise the effect as far as possible.

## **Energy and sustainability**

290. Chapter 9 of the London Plan deals with all aspects of sustainable infrastructure and identifies the reduction of carbon emissions as a key priority. Policy SI2 requires all developments to be net zero carbon with a minimum onsite reduction of 35% for both commercial and residential. Non-residential development should achieve 15 per cent reduction through energy efficiency measures. Where developments are unable to meet net zero carbon targets any shortfall between the minimum 35% and zero carbon must be mitigated by way of a payment towards the carbon offset fund. The energy strategy for new developments must follow the London Plan Hierarchy (be lean/ be clean/ be green/be seen) and this must be demonstrated through the submission of an Energy Strategy with applications and post construction monitoring for a period of 5 years.
291. Southwark Plan Policies P69 and P70 reflect the approach of the London Plan by seeking to ensure that non-residential developments achieve a BREEAM rating of 'Excellent' and include measures to reduce the effects of overheating using the cooling hierarchy. The policies reflect the London Plan approach of 'lean, green and clean' principles and requires non-residential buildings to be zero carbon with an onsite reduction of at least 40%. Any shortfall can be addressed by way a contribution towards the carbon offset green fund.

## Whole life cycle and carbon capture

292. Policy SI 2 – Minimising Greenhouse Gas Emissions of the London Plan requires developments to calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken that would serve to reduce life-cycle carbon emissions.
293. Whole Life Cycle carbon emissions are those associated with the construction, use and eventual deconstruction of a development over its whole life cycle, considering impacts of construction materials, along with their repair, maintenance and replacements, as well as regulated and unregulated operational carbon emissions. A Whole Life Carbon Assessment and GLA Template was submitted.
294. The Whole Life Carbon Assessment follows the GLA template and covers:
- Reuse and retrofit of existing buildings
  - Use of recycled or repurposed materials
  - Material selection
  - Minimising operational energy use
  - Minimising carbon emissions associated with water use
  - Disassembly and reuse
  - Building shape and form and regenerative design

- Designing for durability and flexibility
- Local sourcing, minimising waste and promoting efficient construction including lightweight construction
- Optimising building life expectancy.

295. The proposed development would retain and refurbish two of the buildings whilst embracing high levels of material reuse on site. Materials have been selected to minimise carbon footprint on site and many passive design measures have been adopted. The key mitigation measures that informed the WLCA are as follows:

- Retention of suitable building elements;
- 50% GGBS content in concrete elements;
- 97% recycled content in rebar steel; and
- Low sub-structure material volumes.

296. The GLA have sought clarifications on some aspects of the Whole Life Carbon Assessment and the applicant has provided additional information to the GLA in this regard. This will be finalised prior to Stage II referral. The GLA have also requested a Post Construction Assessment be secured by condition. This condition will be attached to any consent issued.

### Carbon emission reduction

297. As previously stated, the London Plan requires a minimum 35% carbon reduction whilst the Southwark Plan requires a minimum 40% carbon reduction on site. Both policies accept that the difference between these targets and 100% can be balanced through a financial contribution to the carbon offset fund. The development would achieve a carbon reduction on the Vinegar yard Warehouse site of 63% and a carbon reduction on the Bermondsey Street site of 52% giving an overall site wide reduction 54% relative to the current 2013 Part L2A target emission rate (TER) for the building, using SAP10 carbon numbers. This would be accompanied by a carbon offset payment of £245,778 which would bring the development to carbon zero and achieve the aims of the policies of both the London Plan and the Southwark Plan. More detail on the strategy to achieve the overall 54% carbon reduction is set out below:

### Be Lean (use less energy)

298. The development would incorporate a range of passive and active design measures on both the Bermondsey Street site and the Vinegar yard Warehouse site that would reduce carbon emissions through energy efficient design and construction. Passive measures would include adapting building massing, layout and glazing to best respond to the local climate and annual sun path, with the aim of reducing energy demands and improving occupant comfort through limiting solar gain. Active measures across both sites would include:

- Improved fabric insulation.
- High performance glazing.
- Improved air tightness.
- High-performance LED lighting
- Highly efficient cooling and heat recovery ventilation systems.

### Be Clean (supply energy efficiently)

299. Currently there are no nearby district heating networks within 1km of the site that the development could connect to and no on-site CHP system is proposed given the negative carbon value that can be attached to CHP. As such, no carbon savings are reported from the 'Be Clean' stage of the energy hierarchy for either part of the site. The development would be futureproofed in order to ensure the potential to connect to a future district heating network should one become available.

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

300. The proposed development would incorporate Air Source Heat Pumps as part of the Be Green design proposals. Heat pumps will be used throughout for the provision of heating, cooling and hot water. These heat pump systems will enable significant emissions savings over a conventional gas boiler heating system, particularly when factoring in the decarbonisation of the electrical grid

### Be Seen (Monitor and review)

301. The London Plan asks developers to monitor energy use during occupation and to incorporate monitoring equipment to enable occupants to monitor and reduce their energy use. In accordance with London Plan policies it is appropriate to secure post completion monitoring within the S106 agreement. The building would be required to be metered and a building management system would need to be used. This will be secured by condition. As built, the applicant will be required to commit to updating the contextual and energy performance data onto the Be Seen portal and would be required to confirm that the metering installation is installed and correctly calibrated. When operational, the applicant will be required to commit to submitting energy performance data annually for at least 5 years and where performance differs from estimated performance then they will be required to identify the cause and take action where necessary. These commitments would be secured in the legal agreement.

### Circular economy

302. Policy SI 7 Reducing Waste and Supporting the Circular Economy of the London Plan requires referable applications to promote circular economy outcomes and aim to be net zero-waste. These applications are required to submit a Circular Economy Statement to demonstrate:
1. How all materials arising from demolition and remediation works will be re-used and/or recycled.
  2. How the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life.
  3. Opportunities for managing as much waste as possible on site.
  4. Adequate and easily accessible storage space and collection systems to support recycling and re-use.
  5. How much waste the proposal is expected to generate, and how and

where the waste will be managed in accordance with the waste hierarchy.

6. How performance will be monitored and reported.

303. The applicant has submitted a Circular Economy Statement that sets out the approaches taken with regards to the existing building fabric, the updated development proposals, and contributions to the Circular Economy within the context of London as a whole. In terms of the buildings on site, the applicant is focussing on retention and refurbishment strategies with both the Vinegar Yard Warehouse and 40 Bermondsey Street. As well as being a sustainable approach with benefits for the overarching carbon objectives, this retention also seeks to build on the desire to retain the area's physical character and heritage (aesthetic). This would be achieved through retaining as much fabric as possible, including the facades and structural elements wherever possible.
304. For the elements of the development that would represent new build, the proposal has been designed with adaptability and flexibility strategies in order to build on the nature of the new development which is primarily mixed use offices/commercial. The applicant has identified that these uses typically undergo changes to building fabric more readily than purpose-built buildings for other uses. In terms of the London wide considerations, there is an emphasis on supporting increased pedestrian activity and walkability. At the masterplan level, this scheme can consider opportunities specific to how pedestrianisation might support or supported by a circular economy (e.g. building flexibility into the public realm).
305. The Circular Economy Statement covers the site sustainability approach including the strategic approach to the retained buildings and to the new build elements. Consideration has been given to designing out waste, designing for longevity, adaptability and flexibility and an end of life strategy.
306. The statement confirms that a post completion report will be submitted (which will be a conditioned requirement of any consent issued) with an updated Circular Economy Statement when the proposed development has been built out. This is part of the wider 'reporting outcomes' portion which will include the targets, commitments and outcomes that have been achieved. This will include updates of all tables included in the current submitted statement, such as the list of materials and the recycling/waste reporting but with the benefit of taking actual performance and finalised materials into account.
307. The GLA have sought clarifications on some aspects of the Circular Economy Statement with regards to a pre-redevelopment audit and an Operational Waste Management Plan and the applicant has provided additional information to the GLA to cover these points. This will be finalised prior to Stage II referral. The GLA have also requested a Post Construction Assessment be secured by condition. As detailed above, a Post Construction Report will be a conditioned requirement of any consent issued.

### Overheating

308. London Plan Policy SI4 Managing heat risk and Southwark Plan policy P69:

Sustainability standards set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The hierarchy is as follows:

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

309. Internal heat generation would be minimised through the use of low energy, high efficiency, Light Emitting Diode (LED) lighting will be used through-out the development to minimize internal heat gains. In order to reduce the amount of heat entering the building the facades have undergone design review to control the amount of solar gain entering internal spaces. The façade elements have been specified with a low solar transmission. Passive ventilation would be achieved by opening windows and low energy mechanical ventilation and air conditioning would be used.

310. To deliver the high-performance internal environment required by the client, a mechanical ventilation and cooling strategy has been recommended. All fresh air will be delivered by AHUs in the offices and basement changing areas and MVHR units in the ground floor reception and retail units. Cooling will be provided by air source heat pumps in all areas. The efficiency values of these systems will exceed the requirements of the 'Non-Domestic Building Services Compliance Guide'.

### BREEAM

311. Southwark Plan Policies P69 requires the development to achieve BREEAM 'excellent'. A BREEAM Pre-assessment report has been undertaken, presented in the applicant's Sustainability Statement and which demonstrates that an "excellent" standard can be achieved which meets the policy requirement and is therefore acceptable.

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

312. London Plan Policy Df1 and Southwark Plan Policy IP3 advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. These policies are reinforced by the Section 106 Planning Obligations 2015 SPD, which 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



313. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

Planning Obligation	Mitigation	Applicant Position
Affordable workspace	1,572sqm at a 25% discount on market rent for 30 years with relevant rental staircasing.	
Archaeology	£11,171	
Carbon offset	£245,778	
Employment During Construction	Provide 35 jobs, 35 short courses and 8 construction industry apprentices for Southwark residents or make a payment of £167,750.	
Employment in the Development	Provide 86 sustained jobs for unemployed Southwark residents or make a payment of £369,800.	
Transport for London	The applicant must pay for any required re-location of the cycle hire docking station as well as an additional 15 cycle docking spaces. A contribution will also be required for updated/new legible London signage as well as a contribution to Healthy Streets. Transport for London to confirm figures at Stage II.	
Transport (site specific)	£42,032 towards reconstruction of the footway on Snowsfields and £5,520 towards Bermondsey Street  £270,000 towards bus improvements  £100,000 towards cycle hire provision;  £4,000 towards resurfacing works on Snowsfields.	
Trees	Not specifically required unless unforeseen issues prevent trees from being planted or they die within five years of completion of the development in which case a contribution will be sought - £8,000 per tree.	

Admin	Charged at 2% of total.	
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314. The legal agreement should secure the following strategy documents:

- Affordable Workspace Strategy - including a marketing and management strategy;
- Construction Logistics Plan
- Delivery and Servicing Plan – including feasibility for delivery consolidation;
- Demolition and Construction Environmental Management Plan – setting out appropriate dust monitoring and noise assessment/monitoring;
- Employment Skills and Business Support Plan;
- Landscaping Strategy;
- Site Wide Energy Strategy – including full details of Be Seen monitoring and commitment to future proofing the site for onward connection to any future district heating network; and
- Travel Plan;

315. The Legal Agreement will also secure the following S.278 works:

- Repave the footway including new kerbing fronting the development on Bermondsey Street and Snowfields (London Borough of Southwark) in accordance with the SSDM requirements.
- Construct proposed vehicle crossover using materials in accordance with SSDM requirements.
- Reconstruct any redundant vehicle crossovers as footway along Bermondsey Street and Snowfields in accordance with the SSDM requirements.
- Creation of an extended raised table stretching across its intersection with the proposed 'White Lion court' pedestrian route, Bermondsey Street/Snowfields junction.
- Modifications to assist turning large vehicles, reconstruction of the footways on both sides of Snowfields and the segment of Bermondsey Street flanking this site.
- Elimination of the single redundant bollard on the adjoining stretch of Bermondsey Street and the disused vehicle crossover on Snowfields plus the construction of a loading bay and repositioning of the Santander cycle hire facility on Snowfields
- Install any new signage/posts related to the proposed vehicle entrance/exit located in Snowfields due to the one way system along the road. (Promote a TMO to amend any parking arrangements). Works to include road markings and signage.
- Change all utility covers on footway areas to recessed type covers.
- Upgrade street lighting to current LBS standards, including on private roads. Please contact Perry Hazell at [Perry.Hazell@southwark.gov.uk](mailto:Perry.Hazell@southwark.gov.uk) for further details.
- Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development.

316. In the event that an agreement has not been completed by 31 October 2023, the committee is asked to authorise the director of planning to refuse permission, if appropriate, for the following reason:
317. In the absence of a signed S106 legal agreement there is no mechanism in place to mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to Saved Policy 2.5 Planning Obligations of the Southwark Plan 2007, Strategic Policy 14 Delivery and Implementation of the Core Strategy (2011) Policy 8.2 Planning Obligations of the London Plan (2016) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

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

318. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. Southwark's CIL will provide for infrastructure that supports growth in Southwark. In this instance, based on information provided by the applicant, an estimated Mayoral CIL payment of £772,801.57 and a Southwark CIL payment of £148,531.841 would be due. This figure is an estimate only, and would be calculated in more detail when CIL Additional Information and Assumption of Liability forms are submitted prior to implementation.

### **Community involvement and engagement**

319. As part of the original submission the developer undertook an extensive, detailed and robust consultation with the local community (resident/business/stakeholders) both pre and post application submission. This includes five meetings with local business groups and two meetings with resident groups. Two public consultation events were held as set out below:

#### *St Thomas Street East public exhibition – 29 September and 1 October 2018*

320. This event was attended by 254 people and focused on the proposed framework for the St Thomas Street sites.

#### *Three Ten Bermondsey Ltd public exhibition - 10 and 12 November 2018*

321. This event was held by the applicant and focused on the proposed development on the Snowfields and Bermondsey sites. It was attended by 512 people

322. This was supplemented by the Councils own consultation exercise on the 2019 submission. As part of the revised proposals the developer has undertaken further public consultation. This consultation has taken in 2,181 residential and business addresses from the area outlined in the map below:



323. Ward Councillors as well as the Chair of the Planning Committee and the Cabinet member for Climate Emergency and Sustainable Development were invited to comment on the proposals as were the following neighbouring stakeholders:

- Old Bermondsey Neighbourhood Forum
- Team London Bridge
- Snowsfields Primary School
- Kipling Estate TRA
- CIT
- Guy's and St Thomas'
- Manna Day Centre

324. The consultation strategy and the consultation meetings/events are set out in the table below:

Activity	Date
Pre-amendment consultation	
Meeting with Councillor Helen Dennis and Councillor Martin Seaton	19/11/2021
<b>Public Consultation Stage 1</b>	
Introductory stakeholder invitations	26/11/2021
Exhibition invitation (1)	29/11/2021
Public exhibition (1)	09/12/2021
Public Webinar	11/12/2021
Update to project website (including information boards and feedback form available at the public exhibition)	10/12/2021
<b>Public Consultation Stage 2</b>	
Exhibition invitation (2)	09/05/2022
Stakeholder invitations	10/05/2022
Meeting with OBNF	18/05/2022
Public exhibition (2)	23/05/2022
Update to project website (including information boards and feedback form available at the public exhibition)	23/05/2022
Virtual meeting with ward councillors for London Bridge and West Bermondsey	15/07/2022

325. During the first stage of public consultation, a newsletter and survey was sent to the 2,821 addresses identified in the map above. The newsletter provided information on the proposed public exhibition for the 9 December 2021 as well as details of the public webinar of 11 December 2021. The public exhibition held on 9 December at the Artworks Classrooms on Westin Street was attended by 24 people including representatives of Team London Bridge and the OBNF. In order to reach as many people as possible, a webinar was organised and this was attended by 11 people.
326. The second stage of public consultation commenced on the 9 and 10 May 2022 when exhibition invitations were sent to the public and stakeholders. A meeting was held with the OBNF on 18 May 2022 and the public exhibition took place on the 23 May 2022. The public exhibition was attended by 32 attendees including Ward Councillors, Team London Bridge and representatives of the OBNF.
327. Again this was supplemented by the Councils considerable consultation exercise. This included sending 1,371 letters to local residents as part of a neighbour notification exercise. This exercise was initially undertaken on 11 October 2022 and repeated on 24 November 2022 following concerns that some neighbours had not received their initial letter.
328. Following the submission of summary information re-consultation was undertaken again on 27 January 2023 and further repeated again on the 22 March 2023. In addition to this, the revised proposals were advertised in The Southwark News on 6 October 2022, 9 February 2023 and again on the 23 March 2023. A public consultation meeting was held at the Councils offices on 23

February 2023 and attended by Ward Councillors.

329. Significant efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. Details of consultation and any re-consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices.

### **Consultation responses from local groups**

330. The Victorian Society: The Victorian Society appreciates the amendments made in respect to the treatment of Vinegar Yard warehouse. However, the proposed additions to this building, and the other aspects of the scheme continue to raise serious concerns. The proposals to Vinegar Yard Warehouse still envisage the demolition of significant amounts of existing fabric, including the historic windows and staircase. The proposed extension would overpower the building. This would harm the significance of the building as non-designated heritage asset and as a positive contributor to the Conservation Area. Any acceptable extension to the building should not extend further than a single storey higher than the historic warehouse. The proposed Bermondsey Street building would harm the setting and significance of the Conservation Area, detracting from the prevalent low scale buildings. The nearby tall buildings are not a justification and in the context of the higher scale development it is even more important that the setting of the Conservation Area is preserved.
331. SAVE Britain's Heritage: The proposed development would cause substantial harm to both a designated (Bermondsey Street Conservation Area) and non-designated (Vinegar Yard Warehouse) heritage asset. The scale and height of the proposed development will cause significant harm to the fabric and significance of the designated Bermondsey Street Conservation Area and the modest but historic low scale buildings that characterise it. The alterations to the Vinegar Yard Warehouse, a local landmark and NDHA, to be substantially harmful and unjustified in heritage terms. The development proposes substantial demolition of original fabric which is intrinsic to the warehouse's character and significance, including its original windows and staircase. Whilst SAVE supports the principle of restoring this historic structure, the cumulative impact of the overbearing extension proposed and the loss of historic fabric claimed to be necessary to build it, are substantially harmful rendering the benefit of restoring elements of the structure nullified.
332. Old Bermondsey Neighbourhood Forum: The OBNF have formally objected on the basis that there has been inadequate consultation and publication of the application. The main element of the objection is the excessive height, scale and massing of the proposed development as well as inappropriate design which together would have a significant harmful impact on the character and setting of the Bermondsey Street conservation area and the Vinegar Yard Warehouse. The OBNF do not consider the site appropriate for a tall building and contend that planning policy does not support this either. Concerns have been raised about daylight and sunlight impacts as well as overshadowing of amenity spaces. Concerns are also raised about the accuracy of the information submitted and inconsistencies/misrepresentations on the plans.

333. The OBNF state that the Southwark Plan states any harm to a listed buildings or conservation area requires 'robust justification'. To offset the harm to the heritage assets identified above, inadequate justification has been offered in terms of public benefits. The affordable workspace offered is just the mandatory 10%. The public realm space at Vinegar Yard will be dark and windswept, and this development will block light from the public realm and garden to be provided by the adjacent CIT development. While the addition of a thoroughfare from Bermondsey Street to Snowsfields is welcome, it is indirect and closed from 9pm, making it of no benefit to pedestrian routes. Additionally it comes in the form of an arcade primarily for the benefit of the development's commercial tenants rather than the alley it claims to reinstate.
334. The scale of this development is detrimental to the historic environment as well as the micro-environment. It causes significant harm to several heritage assets while offering minimal public benefits in return, as such it should be rejected. Furthermore, the proper public consultation process has been circumvented by the device of calling it a revision rather than the materially different application that it obviously is. This is abundantly proven by the fact that the application has some 150 objections in the earlier form and, as of today, very few in the current form. This is despite the fact that only the degree of abuse to the surrounding historic environment has changed; it remains acute. There must be a proper consultation in accordance with the statutory requirement.
335. Team London Bridge: Comments have been provided covering the shared approach, taking into account the STSE Framework and the impact of the revised proposals on the bookends principle, pedestrian connectivity and hierarchy and the provision of active frontages which Team London Bridge consider could be increased. In terms of the design approach the revised proposals are welcomed as improvements to the original scheme, particularly the Vinegar Yard Warehouse. Concerns are still raised about the western elevation of the Bermondsey Street building and the need to consider the site in the context of potential future developments on adjacent sites.
336. There is the potential for conflict of use within the new pedestrian linkage as the space will be shared with cyclists at some points. Analysis of pedestrian flows should be undertaken and it should be noted that there are opportunities to improve the important junction of Bermondsey Street, Snowsfields, Crucifix lane and St Thomas Street.
337. The provision of office space is supported and is consistent with its location within the CAZ. Retail and active frontages could be improved and there should be an option for more than office use on the ground floor of the Vinegar Yard Warehouse. The improvements to greening and public realm are welcomed although there is the potential for increased greening through vertical planting, green roofs and green walls. There are concerns regarding the proposed public space, it includes aspects that lie on the adjacent site and demonstrates potential for servicing conflict although it is acknowledged that there are challenges in reconciling a scheme across two different development sites and an integrated approach should be taken, perhaps with a design competition. In terms of environment and sustainability, the scheme should move well beyond policy compliance to set exemplary sustainability standards. In the light of the pandemic it should also include use of filtration systems, set high standards for fresh air

provision in the building, make use of wider doors, lifts and routes, deploy touchless systems, and use anti-viral coatings on surfaces.

338. The development would have significant microclimate impacts and a full assessment should be undertaken. Servicing could have impacts on cyclists, pedestrians and traffic flows and the proposals should be brought forward within the context of a consolidation strategy within the whole framework area.
339. WSET: Objection on the basis that there would be disruption/disturbance, the design is not in keeping with the area, the building scale is disproportionate and would be damaging to the historic area. The proposed development would harm the operations of the school and lead to significant disruption for staff and students. Concerns are also raised as to daylight impacts.

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

340. Environment Agency: No objections. It is advised that the applicant submit an amended Flood Risk Assessment that provides suitable levels in metres above Ordnance Datum (mAOD)  
**Response:** Noted, the applicant has addressed this issue.
341. Greater London Authority: The GLA fully support the proposed land use and the provision of affordable workspace. In terms of urban design, the proposed layout and contributions towards public realm and pedestrian permeability are welcomed. Whilst the height could be supported, further consideration of massing and materiality to the Bermondsey Street building is required. Further clarification on fire statement is required. The proposal would result in less than substantial harm to the significance of Bermondsey Street Conservation Area, and listed buildings within it. The GLA consider that the public benefits in terms of public realm improvements, provision of affordable workspace and employment creation could outweigh the identified harm.
342. In transport terms the proposed cycle and car parking is acceptable. Clarification on a replacement cycle hire docking station and servicing facilities for the site is required alongside an appropriate financial contribution. A travel plan, construction logistics plan, and a delivery and servicing plan should be also secured. Financial contributions are sought towards Legible London signage, improved local signage, and other infrastructure works. Clarifications are sought regarding the energy strategy, whole-life carbon assessment, circular economy, urban greening, flood risk assessment, drainage strategy, and biodiversity.
343. **Response:** The proposed affordable workspace would be secured in the S106 agreement. Officers note the GLA concerns with regards to the massing and materials for the Bermondsey Street building and consider that materials would be subject to conditions alongside detailed drawings and mock up conditions. Officer are supportive of the massing an, arrangement and detailed design of the Bermondsey Street building. Additional information has been provided to the GLA by the applicant in terms of energy, WLC, Circular Economy, UGF, drainage and biodiversity. Officer are satisfied that these clarifications suitably deal with the issues raised and this will be confirmed prior to Stage II referral. The relevant financial contributions and strategy requests will be secured in the S106 Agreement.



344. Historic England: On the originally submitted scheme, Historic England raised concerns with regards to the harm caused to Bermondsey Street Conservation Area by the proposed tall building above the historic warehouse at Vinegar Yard. Whilst Historic England welcomed the retention of the principal facades of the warehouse, they believe the 'skin deep' retention would have lacked authenticity and integrity, and the tall building rising above a partially retained Victorian warehouse would have appeared incongruous. Historic England have been consulted on the revised proposals and no longer raise any concerns. They have commented that they do not wish to offer any comments, that the Council should rely on its own specialist conservation advisors and that it is not necessary for them to be consulted again unless there are material changes to the proposal.  
**Response:** Officers note the Historic England no longer have any concerns with the proposed development following the revisions to the original scheme.
345. London Fire Authority: Whilst the London Fire Authority commented on the original submission, no response has been received to the re-consultation on the revised proposals. Previously the London Fire Authority requested that an undertaking should be given that access for fire appliances as required by Part B5 of the current Building Regulations Approved Document B and adequate water supplies for firefighting purposes would be provided.  
**Response:** Noted and agreed, the relevant undertaking will be secure by condition on any planning consent issued.
346. London Underground: No comment.  
**Response:** Noted.
347. Metropolitan Police: It is possible for the scheme to achieve Secured by Design standard and a condition should be added to that effect.  
**Response:** Noted and agreed, the relevant condition will be attached to any consent issued.
348. Natural England: No objection.  
**Response:** Noted.
349. Network Rail: No objections.  
**Response:** Noted.
350. Thames Water: No objections subject to conditions.  
**Response:** Noted, the relevant conditions which relate to water supply, proximity to water infrastructure and proximity to Thames Water assets.
351. Transport for London: TfL support the car free nature of the proposed development and have confirmed that the level of cycle parking would comply with the London Plan. TfL consider that the disabled car parking space provided on-street on Snowfields should be fitted with electric car charging facilities and this would be secured by condition.
352. Given the number of services available at London Bridge, development trips will be well distributed and consequently impacts are not considered, on balance, to be severely adverse. The Council would be supported in securing pooled section 106 contributions for bus service capacity. This should be discussed in detail with

TfL prior to determination of the application. The servicing for the Vinegar Yard Warehouse building is proposed for an on-street loading bay on Snowfields, however this requires relocation of the Snowfields cycle hire docking station.

353. At the previous consultation stage, an agreement in principle was given by TfL, with a caveat that a relocation space is identified nearby that is larger than currently so as to allow expansion of this station by 15 docking points, to accommodate growth in demand from this and other developments in area. Relocation would be at the expense of the applicant, with a contribution towards expansion in line with other nearby developments. The down time for the docking station during relocation would need to be minimised, given high demand in the London Bridge area. Since the previous consultation, demand for cycle hire has generally increased more than anticipated. An alternative location has also not been presented by the applicant. As such and given the low predicted servicing trips (6 per day) for the revised proposal, the applicant should consider other options for servicing the Vinegar Yard Warehouse building, either on-street from Snowfields, for example in place of the proposed Blue Badge parking space or sharing the service yard of the adjacent Vinegar Yard development that was recently approved by the Mayor.
354. In line with other developments in the area, financial contributions should be secured for Legible London signage, a local map refresh, and TfL's St Thomas Street Healthy Streets scheme (two-way cycle track). A travel plan, construction logistics plan (CLP) and a delivery and servicing plan (DSP) should be secured, for approval by the Council in consultation with TfL.
355. **Response:** Financial contributions would be secured for Legible London signage, a local map refresh, and TfL's St Thomas Street Healthy Streets scheme (two-way cycle track) within the S106 agreement. The S106 would also secure the travel plan, construction logistics plan (CLP) and a delivery and servicing plan (DSP) and would be subject to written approval in consultation with TfL. Whilst a contribution has been agreed to extending the cycle hire provision by 15 spaces, discussions are still underway regarding the relocation of the cycle hire docking station and the potential for it to remain in situ (and be extended) subject to amendments to the servicing strategy for the Vinegar yard Warehouse. These issues will be finalised prior to Stage II referral.

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

356. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
357. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
358. 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.

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

### **Human rights implications**

360. 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.

361. This application has the legitimate aim of xxxxx. 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**

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

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

364. **Positive and proactive engagement: summary table**

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

## CONCLUSION

365. The redevelopment of both the Vinegar Yard Warehouse site and the Bermondsey Street site to provide a large scale commercial scheme is supported by current development plan policies. The development would create substantial additional employment floorspace and a consequent increase in jobs and employment opportunities as a result of providing an uplift in high quality office accommodation and a substantial increase in commercial floorspace on a central, sustainable, highly connected brownfield site. The development has the potential to provide up to 592 construction related jobs and up to 915 jobs once the development is completed. The provision of such an increase in employment on a site that benefits from the highest levels of public transport availability is fully supported.
366. The development would provide dedicated long stay and short stay cycle parking that would exceed both London Plan and Southwark Plan standards. This makes a significant contribution towards promoting sustainable transport. The cycle parking would be supplemented by high quality cycling facilities including showering facilities and changing rooms.
367. The proposal would not give rise to significant harm to neighbouring amenity by way of overlooking, loss of privacy, noise or disturbance. Developing sites in highly urbanised environments often results in some unavoidable impacts to daylight and sunlight. Recognising the challenges associated with developing inner city sites, the numerical targets given in the BRE are expected to be treated with a degree of flexibility, having due regard for the existing and emerging context within which these sites are located. The application site is within a Central London Opportunity Area and accordingly the standards should be applied with some degree of flexibility.
368. It is recognised that there will be some adverse impact by way of daylight/sunlight impacts to Globe House, 8-20 Snowfields and the Tyers Estate. Given the small number of windows overall that would experience significant effects and the site specific circumstances set out above including the nature of the affected rooms and windows, it is considered that the overall impact would be acceptable given the benefits of the proposed development in redeveloping a currently under-used site, the provision of a significant new public realm, offices, retail, significant employment opportunities and the full refurbishment and meaningful re-use of

the Vinegar Yard Warehouse. On balance, officers consider that, when reading the BRE guidance with the required flexibility, and in view of the positive benefits of the development proposal, the degree of harm to amenity would not justify withholding planning permission in this case.

369. The public realm improvements with the creation of a new route linking Bermondsey Street and Snowfields would improve permeability and connectivity in the area and provide an eastern bookend to the St Thomas Street developments as well as providing a key element of the public realm. The proposal would provide an extensive improvement to the streetscape which would improve the experience for pedestrians, and provide for natural surveillance. The new public spaces are a particular benefit of this development.
370. Compared to previously, the revised scheme is a significant improvement, adopting a more sensitive approach towards the Vinegar yard Warehouse as a non-designated heritage asset and the Bermondsey Street conservation area. The proposed extension to the warehouse is high quality in terms of form, design and massing and sits well with the host building. The proposals will largely restore the warehouse to its original appearance and ensure its active use and long-term contribution to the local historic environment.
371. The proposal to relocate the tall building element onto the Bermondsey Street side of the site maintains a sizeable quantum of office floorspace uplift, but is located outside the conservation area. Rooting the high-rise structure within the existing, adapted no.40 and a matching replacement no.42-44 Bermondsey Street works well to mediate its street presence, maintaining the character and scale of the streetscape on the edge of the conservation area.
372. The Bermondsey Street building will form a high quality building within the townscape, landmarking the locally important junction of St Thomas Street, Snowfields and Bermondsey Street. Its scale is proportionate to its location and does not affect strategic views or unduly impinge on riverside panoramas. Locally, height and massing is not overbearing, whilst the building will read as part of the transition in building scales towards the London Bridge area and, conversely, form an effective end-stop to the emerging tall building cluster on the edge of north Bermondsey.
373. Part of the application site lies within the Bermondsey Street Conservation Area. 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 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 pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The proposed development would bring forward a fulsome restoration of an important local heritage asset which has fallen into a very poor state of repair. The development and associated restoration work would protect the warehouse for future generations and preserve its character and appearance whilst bringing it into a meaningful and sustained productive use.

374. Despite the revisions, the scale of the proposed buildings are in contrast to the immediate context of Bermondsey Street however the site has been identified in planning policy as being suitable for tall buildings and the architectural quality of the proposal is continues to be of the highest standards. Whilst there would be a degree of harm to the warehouse and conservation area, even allowing for the great weight that must be accorded to the conservation of designated heritage assets, it is considered that the heritage harm is significantly outweighed by the benefits of the scheme.
375. In balancing the harm against the benefits of the scheme, officers consider the significant public benefits to be:
- Provision of a significant uplift in employment floorspace and the creation of up to 915 new high quality jobs;
  - The provision of highly sustainable buildings that together provide a 54% reduction in carbon emissions;
  - The provision of 1,572sqm of affordable workspace provided at a discount of 25% on market rent levels and protected as such for 30 years;
  - The provision of a new route linking Bermondsey Street and Snowfields that will improve pedestrian linkages and support increased connectivity;
  - The refurbishment and restoration of the Vinegar Yard Warehouse;
  - The provision of a high quality public realm and improved landscaping and green spaces.
376. The development would achieve Carbon Zero status through a combination of an in lieu payment and a 54% carbon reduction on site. The on-site carbon reduction of 54% alongside the scheme being expected to achieve BREEAM Excellent will result in an energy efficient and sustainable building within the borough.
377. Developments of this size and nature have the potential for significant environmental impacts and therefore an Environmental Statement has been submitted. The impacts identified in the Environmental Statement have been assessed and taken into account and should be considered in determining the application. No impacts of a significant scale have been identified which are not capable of being mitigated through detailed design, through conditions, or through provisions in the S106 agreement.
378. The application is considered to be in compliance with the development plan, and emerging documents, when read as a whole, and it is therefore recommended that planning permission be granted, subject to conditions, the timely completion of a S106 Agreement and referral to the Mayor of London.

## BACKGROUND INFORMATION

### BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework	Environment Neighbour and Growth Department	Planning enquiries telephone: 020 7525 5403 Planning enquiries email:

and Development Plan Documents	160 Tooley Street London SE1 2QH	planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: www.southwark.gov.uk
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## APPENDICES

No.	Title
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>	Steven Platts, Director of Planning	
<b>Report Author</b>	Terence McLellan (Planning Officer -Team Leader)	
<b>Version</b>	Final	
<b>Dated</b>	13 April 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 of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>		13 April 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.

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<b>Applicant</b>	Three Ten Bermondsey Limited	<b>Reg. Number</b>	19/AP/0404
<b>Application Type</b>	Major application		
<b>Recommendation</b>	GRANT subject to Legal Agreement (GLA)	<b>Case Number</b>	11-C

### Draft of Decision Notice

#### Grant subject to Legal Agreement & Referral to GLA for the following development:

Refurbishment and extension of existing Vinegar Yard Warehouse (equivalent of 7 storeys and 26.188m AOD), demolition of 42-44 Bermondsey Street and retention and extension of 40 Bermondsey Street to form two buildings (equivalent of 12 storeys and 50.425m AOD) to provide office space (Class E); retail space (Class E); new landscaping and public realm including a new pedestrianised route through the site; vehicular access; associated works to public highway; ancillary servicing; plant; storage and associated works.

The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Non-Technical Summary available free of charge, CD of the full ES available for purchase by contacting: Savills on 020 7499 8644.

Re-consultation is being undertaken on the basis of summary information being submitted, including:

Daylight and sunlight summary note (including window maps)



Leather Warehouse condition and restoration summary

Timber rot survey

These documents can be found on the planning register at the following link:

<https://planning.southwark.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZV0NKBWR602>

40-44 Bermondsey Street Vinegar Yard Warehouse 9-17 Vinegar Yard And Land Adjacent To 1-7 Snowfields London

**In accordance with application received on 7 February 2019 and Applicant's Drawing Nos.:**

Existing Plans

A-0101

A-0102

A-0103

A-0301

A-0302

A-0303

A-0304

A-0311

A-0312

A-0321

A-0322

A-0323

received

Proposed Plans

BMY-RHE-XX-XX-DR-Arch-0001-SITE PLAN - GROUND -B  
BMY-RHE-XX-XX-DR-Arch-2119-BASEMENT PLAN LOWER - BMY-E  
BMY-RHE-XX-XX-DR-Arch-2118-BASEMENT PLAN UPPER- BMY-E  
BMY-RHE-XX-XX-DR-Arch-2100-GF PLAN - BMY -H  
BMY-RHE-XX-XX-DR-Arch-2101-01 PLAN - BMY-F  
BMY-RHE-XX-XX-DR-Arch-2102-02 PLAN - BMY-F  
BMY-RHE-XX-XX-DR-Arch-2103-03 PLAN - BMY-F  
BMY-RHE-XX-XX-DR-Arch-2104-04 PLAN - BMY-F  
BMY-RHE-XX-XX-DR-Arch-2105-05 PLAN - BMY-F  
BMY-RHE-XX-XX-DR-Arch-2106-06 PLAN - BMY-F  
BMY-RHE-XX-XX-DR-Arch-2107-07 PLAN - BMY-F  
BMY-RHE-XX-XX-DR-Arch-2108-08 PLAN - BMY-F  
BMY-RHE-XX-XX-DR-Arch-2109-09 PLAN - BMY-F  
BMY-RHE-XX-XX-DR-Arch-2110-10 PLAN - BMY-F  
BMY-RHE-XX-XX-DR-Arch-2111-11 PLAN - BMY-H  
BMY-RHE-XX-XX-DR-Arch-2128-BASEMENT PLAN - VY-C  
BMY-RHE-XX-XX-DR-Arch-2120-GF PLAN - VY-D  
BMY-RHE-XX-XX-DR-Arch-2121-01 PLAN - VY-D  
BMY-RHE-XX-XX-DR-Arch-2122-02 PLAN - VY-D  
BMY-RHE-XX-XX-DR-Arch-2123-03 PLAN - VY-D  
BMY-RHE-XX-XX-DR-Arch-2124-04 PLAN - VY-E  
BMY-RHE-XX-XX-DR-Arch-2125-05 PLAN - VY-D  
BMY-RHE-XX-XX-DR-Arch-2126- PLANT - VY-B  
BMY-RHE-XX-XX-DR-Arch-2127-ROOF PLAN - VY-A  
BMY-RHE-XX-XX-DR-Arch-2202-SECTION- BMY 03-E  
BMY-RHE-XX-XX-DR-Arch-2200-SECTION- BMY 01-E  
BMY-RHE-XX-XX-DR-Arch-2206-SECTION- LB 01+02-B

BMY-RHE-XX-XX-DR-Arch-2308-CONTEXTUAL ELEVATIONS 1  
BMY-RHE-XX-XX-DR-Arch-2309-CONTEXTUAL ELEVATIONS 2  
BMY-RHE-XX-XX-DR-Arch-2301-BERMONDSEY ST ELEVATION-G  
BMY-RHE-XX-XX-DR-Arch-2300-SNOWSFIELD ELEVATION-G  
BMY-RHE-XX-XX-DR-Arch-2303-HARDWIDGE ST ELEVATION-G  
BMY-RHE-XX-XX-DR-Arch-2302-SOUTH ELEVATION-G  
BMY-RHE-XX-XX-DR-Arch-2203-SECTION- BMY 04-E  
BMY-RHE-XX-XX-DR-Arch-2204-SECTION- BMY 05-E  
BMY-RHE-XX-XX-DR-Arch-2205-SECTION- BMY 06-E  
BMY-RHE-XX-XX-DR-Arch-2304-VINEGAR YARD ELEVATION-H  
BMY-RHE-XX-XX-DR-Arch-2305-SNOWSFIELD ELEVATION-H  
BMY-RHE-XX-XX-DR-Arch-2306-DETAIL BAY ELEVATIONS-A

received

1983-JRA-BY-GF-DR-A-0500\_S3 P01  
1983-JRA-BY-01-DR-A-0502\_S3 P01  
1983-JRA-BY-02-DR-A-0502\_S3 P01  
1983-JRA-BY-03-DR-A-0503\_S3 P01  
1983-JRA-BY-RF-DR-A-0504\_S3 P01  
1983-JRA-BY-GF-DR-A-0500\_S3 P01  
1983-JRA-BY-ZZ-DR-A-0510\_S3 P01  
1983-JRA-BY-ZZ-DR-A-0511\_S3 P01  
1983-JRA-LW-GF-DR-A-0520\_S3 P01  
1983-JRA-LW-02-DR-A-0522\_S3 P01  
1983-JRA-LW-04-DR-A-0524\_S3 P01  
1983-JRA-LW-ZZ-DR-A-0530\_S3 P01  
100 REV 10  
102 REV 3  
103 REV 3

104 REV 3

105 REV 3

106 REV 3

400 REV 3 received

Other Documents

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

2. Time Limit

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

Reason:

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

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

3. Prior to the commencement of any development

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

agreed in writing by the Local Planning Authority. The Local Planning Authority shall be given two weeks written notification of commencement of the remediation scheme works.

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

c) In the event that contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-c above.

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the National Planning Policy Framework (2021); P67 Reducing water use, P68 Reducing flood risk, P63 Land for waste management, P64 Contaminated land and hazardous substances of the Southwark Plan (2022).

4. Prior to the commencement of development a drainage strategy detailing any on and or off site drainage works shall be submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. No discharge of foul or surface water from the site shall be accepted into the public systems until drainage works referred to in the strategy have been completed and the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

The development may lead to sewage flooding and to ensure that sufficient capacity is made available to cope with the new development and in order to avoid adverse environmental impact upon the community in accordance with Chapter 14 (Meeting the challenge of climate change, flooding and coastal change) of the National Planning Policy Framework (2021); Policy SI 13 (Sustainable drainage) of the London Plan (2021); P67 Reducing water use, P68 Reducing flood risk, P63 Land for waste management, P64 Contaminated land and hazardous substances of the Southwark Plan 2022.

5. Prior to works commencing, full details of all proposed tree planting shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections, planting and maintenance specifications, use of guards or other protective measures and confirmation of location, species, sizes, nursery stock type, supplier and defect period. All tree planting shall be carried out in accordance with those details and at those times. All trees and shrubs will conform to the specification for nursery stock as set out in British Standard 3936 Parts 1 (1992) and 4 (1984). Advanced Nursery stock trees shall conform to BS 5236 and BS: 4428 Code of practice for general landscaping operations. If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place in the first suitable planting season., unless the local planning authority gives its written consent to any variation.

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in accordance with The National Planning Policy Framework 2021 Parts 8, 11, 12, 15 and 16; 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; and policies of the Southwark Plan (2022) P60 Biodiversity, P13 Design of places, P14 Design quality, P56 Protection of amenity

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

No less than 10 internal swift nesting boxes / bricks shall be provided and the details shall include the exact location, specification and design of the habitats. The boxes / bricks shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

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

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

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with 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).

## 7. ARCHAEOLOGICAL BUILDING RECORDING

Before any work, including demolition, hereby authorised begins, the applicant or successors in title shall secure the implementation of a programme of archaeological building recording in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

In order that the archaeological operations are undertaken to a suitable standard as to the details of the programme of works for the archaeological building recording, in accordance with: Planning Policy Statement 5; Policy P23 (Archaeology) of the Southwark Plan (2022).

## 8. ARCHAEOLOGICAL FOUNDATION DESIGN

Before any work hereby authorised begins, a detailed scheme showing the complete scope and arrangement of the foundation design and all ground works 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.

Reason:

In order that details of the foundations, ground works and all below ground impacts of the proposed development are detailed and accord with the programme of archaeological mitigation works to ensure the preservation of archaeological remains by record and in situ, in accordance with: the National Planning Policy Framework 2019; Policy P23 (Archaeology) of the Southwark Plan (2022).

## 9. Before any development (excluding demolition to ground level only), hereby authorised, begins, the applicant shall:

A. Secure the implementation of a further programme of archaeological excavation work, known as archaeological mitigation. Archaeological mitigation follows on from archaeological evaluation and 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 written scheme of investigation (WSI) for archaeological mitigation, which shall be submitted to the Local Planning Authority for approval in writing.

B. Submit a brief summary report on the results of these mitigation works to the Local Planning Authority for approval in writing. No further demolition or



development shall take place until that written approval is received, which will allow the development to be carried out without further archaeological on-site fieldwork, and will allow the archaeological post-excavation analysis work to commence.

Reason:

Parts A and B: 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 Chapter 16 (Conserving and enhancing the historic environment) of the National Planning Policy Framework (2021); Policy HC1 (Heritage conservation and growth) of the London Plan (2021); and Policy P23 (Archaeology) of the Southwark Plan (2022).

10. In the event that significant archaeological interest is revealed (or is in any case obvious) an appropriate programme of public engagement (public display, interpretation and signage, site visits, accessible public areas or viewing points, etc.) shall be designed by the applicant and submitted to the Local Planning Authority for approval in writing prior to the commencement of development. Detailed drawings of the design, including timetable, location, content and a full specification of the construction and materials shall be submitted to and approved in writing by the Local Planning Authority. The engagement shall be carried out in accordance with the approval given.

Reasons: In order to enhance public value and public benefit from engagement with the historic environment, to contribute to place-making and to provide information on the special archaeological and historical interest of this part of Southwark.

- 11.

Prior to the commencement of works on any development on the Snowfields buildings the applicant shall submit a measured survey of the existing warehouse building to Level 3 (in accordance with the 'Understanding Historic Buildings - HE May 2016) as well as a Schedule of Condition of the walls, structural elements including its foundations, columns, beams and floors, to the Local Planning Authority for approval in writing, prior to the commencement of works. All existing doors, windows, are to be

retained, repaired and refurbished unless otherwise authorised by discharge of condition 12 or otherwise agreed in writing by the council. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order to ensure that the proposed works are in the interest of the special architectural or historic qualities of the listed building in accordance with Chapter 16 (Conserving and enhancing the historic environment) of the National Planning Policy Framework (2021); Policy HC1 (Heritage conservation and growth) of the London Plan (2021); Policy P19 (Listed buildings and structures), Policy P20 (Conservation areas) and Policy P21 (Conservation of the historic environment and natural heritage) of the Southwark Plan (2022).

12

Prior to commencement of works on any development on the Snowfields buildings site the applicant shall submit to the Local Planning Authority for approval in writing a Method Statement and Full Schedule of Restoration Works describing how the historic warehouse will be incorporated into the development in respect of:

- i) A monitoring strategy for continued monitoring of the works including methods for ensuring that all works are carried out in a scholarly manner.
- ii) A detailed condition survey and archaeological recoding of the building, a method statement for removal, storage, repair and reinstatement of historic fabric including painted signage, hatch ranks, all windows and doorways, internal pulley and lift mechanisms, primary and secondary timbers, cast iron columns and the extent of demolition
- iii) The details of repairs and reconstruction proposed
- iv) Support, protection and repair of any existing features
- v) Excavation of foundations
- vi) Details of reinstated entrances and window openings within the warehouse building; and details of new flooring build up to minimise obscuring the base of the cast iron columns.

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

Reason:

In order to ensure that the proposed works are in the interest of the special architectural or historic qualities of the listed building in accordance with Chapter 16 (Conserving and enhancing the historic environment) of the National Planning Policy Framework (2021); Policy HC1 (Heritage conservation and growth) of the London Plan (2021); Policy P19 (Listed buildings and structures), Policy P20 (Conservation areas) and Policy P21 (Conservation of the historic environment and natural heritage) of the Southwark Plan (202

13. Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not harm groundwater resources in line with the National Planning Policy Framework (NPPF) (Paragraph 174). The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to controlled waters.

14. No development shall take place (i) demolition (ii) construction, until a Construction Method Statement has been submitted to and approved in writing by the Local Planning Authority in consultation with London Underground. The approved statement shall be adhered to throughout the construction period. The Statement shall provide for:
  - a) the parking of vehicles of site operatives and visitors;
  - b) loading and unloading of plant and materials;
  - c) storage of plant and materials used in constructing the development;
  - d) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;

- e) wheel washing facilities;
- f) measures to control the emission of dust and dirt during construction;
- g) a scheme for recycling / disposing of waste resulting from demolition and construction works

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with the NPPF 2021; and Policy P56 Protection of Amenity of the Southwark Plan 2022.

15. Prior to the commencement of development (with the exception of demolition works, site clearance, site investigations, excavation and piling , a Vehicle Dynamics Assessment shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Metropolitan Police. The development shall then be implemented in accordance with any approval given.

Reason

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

16. Prior to the commencement of development (with the exception of demolition works, site clearance and site investigations works), a Blast Mitigation Impact Assessment shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Metropolitan Police. The development shall then be implemented in accordance with any approval given.

Reason

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with the National Planning Policy Framework 2021; Policy D11 -

Safety Security and Resilience to Emergency of the London Plan 2021; and Policy P16 - Designing out Crime of the Southwark Plan 2022.

17. Prior to the commencement of development (with the exception of demolition works, site clearance, site investigations, excavation and piling ), details of all proposed Hostile Vehicle Mitigation shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Metropolitan Police. The development shall then be implemented in accordance with any approval given.

Reason

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

18. 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 above grade works

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; Policy D11 - Safety Security and Resilience to Emergency of the London Plan 2021; and Policy P16 - Designing out Crime of the Southwark Plan 2022.

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

19. Prior to above grade construction commencing, material samples/sample-panels/sample-boards of all external facing materials including finish and details of colouration, to be used in the carrying out of this permission shall be presented on site and approved in writing by the Local Planning Authority; the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with the National Planning Policy Framework 2021; Policy D4 - Delivering Good Design of the London Plan 2021; and Policy P14 - Design Quality of the Southwark Plan 2022.

20. 1:5/10 typical section detail-drawings through all buildings facades; parapets; heads, cills and jambs of all openings; entrance lobbies; shop frontages; roof edges; details of typical window openings, terraces, roof gardens, soffits, entrances (inc servicing) and shopfronts to be used in the carrying out of this permission shall be submitted to and approved in writing by the Local Planning Authority before any construction work above grade in connection with this permission is carried out. The scope of details to be submitted to the Local Planning Authority shall be agreed prior to submission. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the National Planning Policy Framework 2021; Policy D4 - Delivering Good Design of the London Plan 2021; and Policy P14 - Design Quality of the Southwark Plan 2022.

21. Full-scale mock-ups of the facades shall be presented on site (or a location agreed with the Local Planning Authority) and approved in writing by the Local Planning Authority before any construction work above grade for the relevant building in connection with this permission is carried out; the development shall not be carried out otherwise than in accordance with any such approval given. The detailed scope of mock up requirements must be agreed with the Local

Planning Authority in advance of the mock ups being constructed and presented on site.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the National Planning Policy Framework 2021; Policy D4 - Delivering Good Design of the London Plan 2021; and Policy P14 - Design Quality of the Southwark Plan 2022.

## 22. HARD AND SOFT LANDSCAPING

Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, available rooting space, tree pits, surfacing materials of any parking, access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use. The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the 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).

## 23. GREEN ROOFS FOR BIODIVERSITY

Part 1: 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.

Part 2: 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).

## 24. CYCLE STORAGE DETAILS



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

Reason: In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2021); Policy T5 (Cycling) of the London Plan (2021); Policy P53 (Cycling) of the Southwark Plan (2022).

## 25. BREEAM REPORT AND POST CONSTRUCTION REVIEW

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

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

Reason:

To ensure the proposal complies with Chapter 14 (Meeting the challenge of climate change, flooding and coastal change) of the National Planning Policy Framework (2021); Policy SI 2 (Minimising greenhouse gas emissions) of the

London Plan (2021); Policy P69 (Sustainability Standards) and Policy P70 (Energy) of the Southwark Plan (2022).

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

26. No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows from the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](http://thameswater.co.uk/preplanning).

27. DETAILS OF THE REFUSE STORAGE FACILITIES Before the first occupation of the development hereby permitted begins, details of the arrangements for the storing of domestic and/or commercial refuse (whichever is applicable) shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the approved refuse storage facilities shall be provided and made available for use by the occupiers of the development and the facilities shall thereafter be retained and shall not be used or the space used for any other purpose.

Reason: To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with Chapters 8 (Promoting healthy and safe communities) and 12 (Achieving well-designed places) of the

National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021); Policy P62 (Reducing Waste) and Policy P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan (2022).

28. VENTILATION DETAILS Prior to the commencement of use, full particulars and details of a scheme for the ventilation of the premises to an appropriate outlet level, including details of sound attenuation for any necessary plant and the standard of dilution expected, has been submitted to and approved by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given.

Reason In order to ensure that that the ventilation ducting and ancillary equipment will not result in an odour, fume or noise nuisance and will not detract from the appearance of the building in the interests of amenity in accordance with Chapter 8 (Promoting healthy and safe communities) of the National Planning Policy Framework (2021); Policy SI 1 (Air quality) of the London Plan (2021); P64 (Contaminated land and hazardous substances) P65 (Improving air quality) and P56 (Protection of Amenity) of the Southwark Plan (2022).

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

Reason

In order to ensure that the quality of the design and details are in accordance with the NPPF 2021; Policy D4 Delivering Good Design of the London Plan 2021; and Policy P14 - Design Quality of the Southwark Plan 2022.

30. As the site is at residual risk from and within a breach zone of the River Thames, a stand alone Flood Warning and Emergency Evacuation Plan should be submitted to Southwark's Emergency Planning department for their approval prior to occupation of the site. The plan should state how occupants will be made

aware that they can sign up to the Environment Agency Flood Warning services, and of the plan itself. The plan should provide details of how occupants should respond in the event that they receive a flood warning, or become aware of a flood. The report should be proportionate and risk based in terms of sources of flooding.

Reason: To ensure that occupants have the opportunity to plan a response to flood events which can save them valuable time should an event occur.

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

31. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.

Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure.

32. The machinery, plant or equipment installed or operated in connection with the carrying out of this permission shall be so enclosed and/or attenuated that noise does not, at any time, increase the ambient equivalent noise level when the plant, etc., is in use as measured at any adjoining or nearby premises in separate occupation; or (in the case of any adjoining or nearby residential premises) as measured outside those premises.

## Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance from plant and machinery in accordance with the National Planning Policy Framework 2021; Policy D14 - Noise of the London Plan 2021; and Policy P14 - Design Quality, and Policy P66 - Reducing Noise Pollution and Enhancing Soundscapes of the Southwark Plan 2022.

33. Other than for maintenance purposes, repair purposes or means of escape, the office terraces shall not be used outside of the following hours:

10:00 - 21:00 daily

Unless otherwise agreed in writing with the Local Planning Authority.

## Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance in accordance with the National Planning Policy Framework 2021; Policy D14 - Noise of the London Plan 2021; and Policy P14 - Design Quality of the Southwark Plan 2022.

34. The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014

## Reason

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework 2021; Policy D14 - Noise of the London Plan 2021; and Policy P14 - Design Quality, Policy P66 - Reducing Noise Pollution and Enhancing Soundscapes of the Southwark Plan 2022.

35. No roof plant, equipment or other structures, other than as shown on the plans hereby approved or approved pursuant to a condition of this permission, shall be placed on the roof or be permitted to project above the roofline of any part of the buildings as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosures of any buildings hereby permitted unless otherwise agreed in writing by the Local Planning Authority.

#### 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 National Planning Policy Framework 2021; Policy D4 - Delivering Good Design of the London Plan 2021; and Policy P14 - Design Quality of the Southwark Plan 2022.

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

36. 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 the NPPF 2021; Policy HC1 - Heritage Conservation and Growth of the London Plan 2021; and Policy P23 - Archaeology of the Southwark Plan 2022.

37. Within 12 months of first occupation, a Whole Life Cycle Carbon Assessment demonstrating compliance with Part F of Policy SI 2 - Minimising greenhouse

gas emissions of the London Plan 2021, shall be submitted and approved in writing by the Local Planning Authority. This assessment should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

## **Appendix 2: Relevant Policies**

### **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 7 Ensuring the vitality of town centres
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed places
- Chapter 14 Meeting the challenge of climate change, flooding and coastal change
- Chapter 16 Conserving and enhancing the historic environment

### **New London Plan 2021**

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 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 D10 Basement development
- Policy D11 Safety, security and resilience to emergency



Policy D12 Fire safety  
 Policy D13 Agent of Change  
 Policy D14 Noise Policy S1 Developing London's social infrastructure  
 Policy S2 Health and social care facilities  
 Policy S6 Public toilets  
 Policy E1 Offices  
 Policy E2 Providing suitable business space  
 Policy E3 Affordable workspace  
 Policy E8 Sector growth opportunities and clusters  
 Policy E9 Retail, markets and hot food takeaways  
 Policy E10 Visitor infrastructure  
 Policy E11 Skills and opportunities for all  
 Policy HC1 Heritage conservation and growth  
 Policy HC2 World Heritage Sites  
 Policy HC3 Strategic and Local Views  
 Policy HC4 London View Management Framework  
 Policy HC5 Supporting London's culture and creative industries  
 Policy HC6 Supporting the night-time economy  
 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 T1 Strategic approach to transport  
 Policy T2 Healthy Streets  
 Policy T3 Transport capacity, connectivity and safeguarding  
 Policy T4 Assessing and mitigating transport impacts  
 Policy T5 Cycling  
 Policy T6 Car parking  
 Policy T6.2 Office parking  
 Policy T6.3 Retail parking  
 Policy T6.5 Non-residential disabled persons parking  
 Policy T7 Deliveries, servicing and construction  
 Policy T9 Funding transport infrastructure through planning

### Southwark Plan 2022

ST1 Southwark's Development targets  
 ST2 Southwark's Places  
 SP2 Southwark Together

SP3 Great start in life  
 SP4 Green and inclusive economy  
 SP5 Thriving neighbourhoods and tackling health equalities  
 SP6 Climate Change  
 P13 Design of places  
 P14 Design quality  
 P16 Designing out crime  
 P17 Tall buildings  
 P18 Efficient use of land  
 P20 Conservation areas  
 P21 Conservation of the historic environment and natural heritage  
 P22 Borough views  
 P23 Archaeology  
 P28 Access to employment and training  
 P30 Office and business development  
 P31 Affordable workspace  
 P35 Town and local centres  
 P44 Broadband and digital infrastructure  
 P45 Healthy developments  
 P47 Community uses  
 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  
 NSP55

#### Mayors SPD/SPGs

Accessible London: Achieving an Inclusive Environment (October 2014)  
 The control of dust and emissions during construction and demolition (July 2014)  
 Town Centres (July 2014)  
 Character and Context (June 2014)  
 Sustainable Design and Construction (April 2014)  
 Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (April 2013)  
 London View Management Framework (March 2012)

Planning for Equality and Diversity in London (October 2007)

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 (2009)

## Property History

U.P.R.N 200003363541  
 Application No 19/AP/0404  
 Address: 40-44 Bermondsey Street Vinegar Yard Warehouse 9-17 Vinegar Yard And Land Adjacent To 1-7 Snowfields London  
 Date: 12 April 2023

Ref	Description	Status	Open Date	Closed Date
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## Planning Pre-Apps

21/EQ/0259	Pre application planning advice amendment to 19/AP/0404 Amendments to the live planning application 19/AP/0404: Partial demolition and facade retention at 40-44 Bermondsey Street including partial demolition, side extension and refurbishment of existing Vinegar Yard Warehouse and erection of two new buildings with basements and heights ranging from five storeys (26.5m AOD) to 11 storeys (54.35m AOD) to provide office space (Class Eg(i)); flexible retail space (Use Class E); new landscaping and public realm; reconfigured pedestrian and vehicular access; associated works to public highway; ancillary servicing; plant; storage and associated works	INV	26.10.2021	
23/PPA/0007	Planning performance agreement 19/AP/0404	PCO	02.03.2023	
23/PPA/0008	Planning performance agreement relating to 19/AP/0404 (Bermondsey Works)	INV	17.03.2023	

## Planning Applications

87/AP/0570	The erection of an office building (outline application) at 40 Bermondsey Street SE1 ( LBS reg no 570 / 87 )	REOUT	05.05.1987	28.07.1987
86/AP/1047	Erection of a four storey office building with internal car parking at 40 Bermondsey Street SE1 ( LBS Reg no 1047-86 )	REMIN	24.07.1986	24.09.1986
87/AP/0569	Erection of a office building with operational parking and servicing area land at 40 Bermondsey Street SE1 LBS 571/87	REMIN	08.05.1987	28.07.1987
84/AP/0589	Erection of three industrial workshops with offices and carparking LBS 589-84	GRMIN	08.02.1984	31.05.1984
18/EQ/0390	Demolition and modification to existing buildings, construction of two office buildings with retail units at ground floor level.	INV	06.11.2018	19.05.2019
18/AP/3328	EIA Scoping Opinion for the demolition of and modifications to the existing buildings and the construction of two office-led buildings.	SCP	11.10.2018	14.06.2022
19/AP/0404	Refurbishment and extension of existing Vinegar Yard Warehouse (equivalent of 7 storeys and 26.188m AOD), demolition of 42-44 Bermondsey Street and retention and extension of 40 Bermondsey Street to form two buildings (equivalent of 12 storeys and 50.425m AOD) to provide office space (Class E); retail space (Class E); new landscaping and public realm including a new pedestrianised route through the site; vehicular access; associated works to public highway; ancillary servicing; plant; storage and associated works.	PDE	07.02.2019	

The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Non-Technical Summary available free of charge, CD of the full ES available for purchase by contacting: Savills on 020 7499 8644.

Re-consultation is being undertaken on the basis of summary information being submitted, including:  
Daylight and sunlight summary note (including window maps)  
Leather Warehouse condition and restoration summary  
Timber rot survey  
These documents can be found on the planning register at the following link:  
<https://planning.southwark.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZV0NKBWR602>

17/AP/1351	Permanent change of use from office (Class B1(a)) to restaurant/cafe use (Class A3) and the creation of an enclosed external seating area and adjacent external seating to rear yard.	GRCOU	06.04.2017	23.05.2018
15/AP/3029	Conversion of existing office building ground floor area of 150sq.m into A3 Restaurant	INV	28.07.2015	25.09.2015
15/AP/2980	Alterations to existing front elevation at ground floor to create a new entrance in an existing window opening with a metal door and two replacement metal windows	GRMIN	27.07.2015	21.09.2015

06/EQ/0212	Refurbishment of existing property	EQC	10.03.2006	03.04.2006
18/AP/3328	EIA Scoping Opinion for the demolition of and modifications to the existing buildings and the construction of two office-led buildings.	SCP	11.10.2018	14.06.2022
19/AP/3969	Change of use from Class A3 restaurant/cafe and sui generis car parking to Class AA Drinking Establishment with Expanded Food Provision	PCO	28.08.2019	
15/AP/3029	Conversion of existing office building ground floor area of 150sq.m into A3 Restaurant	INV	28.07.2015	25.09.2015
92/AP/0849	Change of use of vacant warehousing to a training centre and emergency trading floor LBS Reg 92/849	GRCOU	14.10.1992	30.12.1992
83/AP/1293	Erection of a manufacturing workshop, warehouse, ancillary offices and a residential flat LBS 1293-83	GROUT	05.09.1983	13.12.1983
85/AP/1293	Erection of a warehouse 42-44 Bermondsey Street SE1	GRMIN	02.09.1985	07.01.1986
85/AP/2741	Erection of a warehouse 42-44 Bermondsey Street SE1	GRMIN	13.12.1985	07.01.1986
18/EQ/0390	Demolition and modification to existing buildings, construction of two office buildings with retail units at ground floor level.	INV	06.11.2018	19.05.2019
17/AP/4048	Continued temporary use of warehouse (Use Class B8) as offices (Use Class B1(a)) for a further period of five years.	GFLP	24.10.2017	14.12.2017
15/AP/3657	Change of use from warehouse use (Use Class B8) to use as offices (Use Class B1(a)) for a period of two years.	GRCOU	10.09.2015	09.11.2015
14/AP/4316	Change of use from a warehouse (Use Class B8) to a mixed use comprising of a food market (Sui Generis) and bar (Use Class A4) for a temporary period of three years and including the erection of a new mezzanine	GFLP	17.11.2014	18.03.2015

	floor, the reinstatement of two windows on the east elevation, the installation of a new entrance on the north elevation, new mezzanine floor and the replacement of an existing door on the west elevation.			
10/AP/0088	Continued use as theatre (sui generis) with the addition of an entrance/exit to the ground level front elevation facing onto Bermondsey Street: renewal of permission dated 11-05-2009 under ref 09-ap-0059.	GFLP	15.01.2010	24.05.2010
09/AP/0059	Change of use from Class B1 to theatre use (sui generis) with the addition of an additional entrance/exit to the ground level front elevation facing onto Bermondsey Street.	GFLP	15.01.2009	11.05.2009
18/EQ/0390	Demolition and modification to existing buildings, construction of two office buildings with retail units at ground floor level.	INV	06.11.2018	19.05.2019
18/EQ/0390	Demolition and modification to existing buildings, construction of two office buildings with retail units at ground floor level.	INV	06.11.2018	19.05.2019
84/AP/0589	Erection of three industrial workshops with offices and carparking LBS 589-84	GRMIN	08.02.1984	31.05.1984
18/EQ/0390	Demolition and modification to existing buildings, construction of two office buildings with retail units at ground floor level.	INV	06.11.2018	19.05.2019

### Appeals

APPEAL/87/0002	Erection of an office building with operational parking and servicing area land at 40 Bermondsey Street SE1 (LBS 571/87)	ALL	01.09.1987	27.10.1987
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APPEAL/87/0003	Erection of a four storey office building with internal car parking at 40 Bermondsey Street SE1 ( LBS Reg no 187-86 )	DIS	01.09.1987	27.10.1987
APPEAL/87/0004	The erection of an office building (outline application) at 40 Bermondsey Street SE1 ( LBS reg no 570 / 87 )	DIS	01.09.1987	27.10.1987

**Appendix 4: Consultation undertaken**

**Site notice date:**

**Press notice date:** 23/03/2023

**Case officer site visit date:** 18.05.2019

**Neighbour consultation letters sent:** 22/03/2023

**Internal services consulted**

Flood Risk Management & Urban Drainage

Highways Licensing

Highways Development and Management

Waste Management

Ecology

Archaeology

Design and Conservation Team

Urban Forester

Flood Risk Management & Urban Drainage

Archaeology

Design and Conservation Team

Ecology

Highways Development and Management

Highways Licensing

Flood Risk Management & Urban Drainage

Urban Forester

Waste Management

Local Economy

Environmental Protection

Transport Policy

Archaeology

Design and Conservation Team

Local Economy

Ecology

Environmental Protection

Highways Development and Management

Highways Licensing

Flood Risk Management & Urban Drainage

Transport Policy

Urban Forester

Waste Management

### **Statutory and non-statutory organisations**

Environment Agency

Thames Water

Transport for London

Network Rail

Great London Authority

EDF Energy

London Fire & Emergency Planning Authori

London Underground

Metropolitan Police Service (Designing O

Natural England - London & South East Re

Planning Policy

Natural England - London & South East Re

London Underground

Environment Agency

Thames Water

EDF Energy

Environment Agency

Great London Authority

London Fire & Emergency Planning Authori

London Underground

Natural England - London & South East Re

Network Rail

Metropolitan Police Service (Designing O

Transport for London

Thames Water

EDF Energy

Environment Agency

Great London Authority

London Fire & Emergency Planning Authori

London Underground

Natural England - London & South East Re

Network Rail

Planning Policy

Metropolitan Police Service (Designing O

Transport for London

Thames Water

**Neighbour and local groups consulted:**

Beckett House 60-68 St Thomas Street  
London

22 Guinness Court Snowsfields London

10-11 Snowsfields London SE1 3SU

40 Guinness Court Snowsfields London

41 Guinness Court Snowsfields London

82 Whites Grounds Estate Whites  
Grounds London

85 Whites Grounds Estate Whites  
Grounds London

88 Whites Grounds Estate Whites  
Grounds London

90 Whites Grounds Estate Whites  
Grounds London

34 Whites Grounds Estate Whites  
Grounds London

35 Whites Grounds Estate Whites  
Grounds London

115 Whites Grounds Estate Whites  
Grounds London

92 Whites Grounds Estate Whites  
Grounds London

113 Whites Grounds Estate Whites  
Grounds London

114 Whites Grounds Estate Whites  
Grounds London

101 Whites Grounds Estate Whites  
Grounds London

99 Guinness Court Snowfields London

122 Guinness Court Snowfields London

123 Guinness Court Snowfields London

120 Guinness Court Snowfields London

121 Guinness Court Snowfields London

12 Bridgewalk Heights 80 Weston Street  
London

12A Bridgewalk Heights 80 Weston  
Street London

10 Bridgewalk Heights 80 Weston Street  
London

11 Bridgewalk Heights 80 Weston Street  
London

13A Bridgewalk Heights 80 Weston  
Street London

17 Bridgewalk Heights 80 Weston Street  
London

18 Bridgewalk Heights 80 Weston Street  
London

15 Bridgewalk Heights 80 Weston Street  
London

16 Bridgewalk Heights 80 Weston Street  
London

1 Bridgewalk Heights 80 Weston Street  
London

2 Bridgewalk Heights 80 Weston Street  
London

Flat 7 2 Tyers Gate London

3 Bridgewalk Heights 80 Weston Street  
London

8 Bridgewalk Heights 80 Weston Street  
London

9 Bridgewalk Heights 80 Weston Street  
London

5 Bridgewalk Heights 80 Weston Street  
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7 Bridgewalk Heights 80 Weston Street  
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19 Bridgewalk Heights 80 Weston Street  
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31 Bridgewalk Heights 80 Weston Street  
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32 Bridgewalk Heights 80 Weston Street  
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29 Bridgewalk Heights 80 Weston Street  
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30 Bridgewalk Heights 80 Weston Street  
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33 Bridgewalk Heights 80 Weston Street  
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106 Weston Street London SE1 3QB

33A Bridgewalk Heights 80 Weston  
Street London

35 Bridgewalk Heights 80 Weston Street  
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22 Bridgewalk Heights 80 Weston Street  
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23 Bridgewalk Heights 80 Weston Street  
London

20 Bridgewalk Heights 80 Weston Street London	3 Tyers Gate London SE1 3HX
21 Bridgewalk Heights 80 Weston Street London	Flat 1 2 Tyers Gate London
23A Bridgewalk Heights 80 Weston Street London	Flat 4 2 Tyers Gate London
27 Bridgewalk Heights 80 Weston Street London	Flat 5 2 Tyers Gate London
28 Bridgewalk Heights 80 Weston Street London	Flat 2 2 Tyers Gate London
25 Bridgewalk Heights 80 Weston Street London	Flat 3 2 Tyers Gate London
26 Bridgewalk Heights 80 Weston Street London	6 Leathermarket Court London SE1 3HS
Flat 6 2 Tyers Gate London	7 Leathermarket Court London SE1 3HS
4 Leathermarket Street London SE1 3HN	4 Leathermarket Court London SE1 3HS
8-9 Snowsfields London SE1 3SU	5 Leathermarket Court London SE1 3HS
2-2A Morocco Street London SE1 3HB	8 Leathermarket Court London SE1 3HS
1 Leathermarket Court London SE1 3HS	11 Leathermarket Court London SE1 3HS
2 Leathermarket Court London SE1 3HS	4 Black Swan Yard London SE1 3XW
62-66 Bermondsey Street London SE1 3UD	9 Leathermarket Court London SE1 3HS
Vintage Yard 59-63 Bermondsey Street London	10 Leathermarket Court London SE1 3HS
104 Bermondsey Street London SE1 3UB	Flat 4 40 Snowsfields London
74 Bermondsey Street London SE1 3UD	Flat 4 42 Snowsfields London
Margret House 111 Snowsfields London	Flat 3 40 Snowsfields London
61 St Thomas Street London SE1 3QX	Flat 3 42 Snowsfields London
1-7 Snowsfields London SE1 3SU	Flat 5 40 Snowsfields London
3 Leathermarket Court London SE1 3HS	Flat 7 40 Snowsfields London
Neighbourhood Housing Office 26 Leathermarket Street London	Flat 8 40 Snowsfields London
75-79 St Thomas Street London SE1 3QX	Flat 5 42 Snowsfields London
	Flat 6 40 Snowsfields London
	62-64 Weston Street London SE1 3QJ
	56 Bermondsey Street London SE1 3UD
	43 Snowsfields London SE1 3SU
	1 Tyers Gate London SE1 3HX
	10 Whites Grounds Estate Whites Grounds London
	Flat 2 40 Snowsfields London

Flat 2 42 Snowfields London	3 Tyers Estate Bermondsey Street London
Flat 1 40 Snowfields London	4 Tyers Estate Bermondsey Street London
Flat 1 42 Snowfields London	12 Tyers Estate Bermondsey Street London
1 Guinness Court Snowfields London	2 Tyers Estate Bermondsey Street London
20 Guinness Court Snowfields London	5 Tyers Estate Bermondsey Street London
21 Guinness Court Snowfields London	8 Tyers Estate Bermondsey Street London
19 Guinness Court Snowfields London	9 Tyers Estate Bermondsey Street London
2 Guinness Court Snowfields London	6 Tyers Estate Bermondsey Street London
Flat 18 Lion Court 12 Shand Street	7 Tyers Estate Bermondsey Street London
25 Guinness Court Snowfields London	Flat 4 64 Weston Street London
26 Guinness Court Snowfields London	16 Snowfields London SE1 3SU
23 Guinness Court Snowfields London	17 Snowfields London SE1 3SU
24 Guinness Court Snowfields London	14 Snowfields London SE1 3SU
12 Guinness Court Snowfields London	15 Snowfields London SE1 3SU
13 Guinness Court Snowfields London	18 Snowfields London SE1 3SU
10 Guinness Court Snowfields London	38 Snowfields London SE1 3SU
11 Guinness Court Snowfields London	39 Snowfields London SE1 3SU
14 Guinness Court Snowfields London	20 Snowfields London SE1 3SU
17 Guinness Court Snowfields London	Flat 7 64 Weston Street London
18 Guinness Court Snowfields London	Flat 8 64 Weston Street London
15 Guinness Court Snowfields London	Flat 5 64 Weston Street London
16 Guinness Court Snowfields London	Flat 6 64 Weston Street London
41 Snowfields London SE1 3SU	Flat 9 64 Weston Street London
Flat 1 62 Weston Street London	Flat Above 10-11 Snowfields London
Flat 1 64 Weston Street London	12 Snowfields London SE1 3SU
Flat 10 64 Weston Street London	
Flat 11 64 Weston Street London	
Flat 2 62 Weston Street London	
Flat 3 64 Weston Street London	
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54 Tyers Estate Bermondsey Street  
London

27 Guinness Court Snowsfields London  
109 Guinness Court Snowsfields London  
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107 Guinness Court Snowsfields London  
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50 Guinness Court Snowsfields London  
64 Whites Grounds Estate Whites  
Grounds London  
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Grounds London  
70 Whites Grounds Estate Whites  
Grounds London  
67 Whites Grounds Estate Whites  
Grounds London  
68 Whites Grounds Estate Whites  
Grounds London  
5 Tyers Gate London SE1 3HX  
60 Whites Grounds Estate Whites  
Grounds London  
61 Whites Grounds Estate Whites  
Grounds London  
71 Whites Grounds Estate Whites  
Grounds London  
83 Whites Grounds Estate Whites  
Grounds London  
84 Whites Grounds Estate Whites  
Grounds London  
81 Whites Grounds Estate Whites  
Grounds London  
Medical School Tower Wing Guys  
Hospital Great Maze Pond  
Rooms 1 Second Floor 3-5 Hardwidge  
Street London  
89 Whites Grounds Estate Whites  
Grounds London  
86 Whites Grounds Estate Whites  
Grounds London  
87 Whites Grounds Estate Whites  
Grounds London  
74 Whites Grounds Estate Whites  
Grounds London  
75 Whites Grounds Estate Whites  
Grounds London  
72 Whites Grounds Estate Whites  
Grounds London  
73 Whites Grounds Estate Whites  
Grounds London  
76 Whites Grounds Estate Whites  
Grounds London  
79 Whites Grounds Estate Whites  
Grounds London  
80 Whites Grounds Estate Whites  
Grounds London  
77 Whites Grounds Estate Whites  
Grounds London  
78 Whites Grounds Estate Whites  
Grounds London

Basement To First Floor 150-152 Tooley Street London

Second Floor 150-152 Tooley Street London

Part Fourth Floor 136-148 Tooley Street London

Part Ground Floor 148 Tooley Street London

Part Ground Floor And Ninth Floor Capital House 42 Weston Street

Basement 60 Weston Street London

Part Ground Floor And First Floor Capital House 42 Weston Street

Part Ground Floor And Eighth Floor Capital House 42 Weston Street

First Floor 134 Tooley Street London

Second Floor 134 Tooley Street London

Basement And Ground Floor Rear 134 Tooley Street London

Part Ground Floor Front 134 Tooley Street London

Third Floor Rear 134 Tooley Street London

Part Third Floor West 136-148 Tooley Street London

Part Fourth Floor And Fifth Floor 136-148 Tooley Street London

Basement 136-148 Tooley Street London

Part Third Floor East 136-148 Tooley Street London

Ground Floor 60 Weston Street London

1 Leathermarket Street London SE1 3HN

The Glasshouse 3 Melior Place London

Unit 1 The Grain Stores 70 Weston Street

Unit 2 The Grain Stores 70 Weston Street

First Floor 60 Weston Street London

Second Floor 60 Weston Street London

Units 3 And 4 The Grain Stores 70 Weston Street

The Greenwood Theatre 55 Weston Street London

Ground Floor 2 Whites Grounds London

Basement 77 Weston Street London

Second Floor 77 Weston Street London

Apartment 4 8 Melior Street London

Apartment 5 8 Melior Street London

Apartment 2 8 Melior Street London

Apartment 3 8 Melior Street London

32 Whites Grounds Estate Whites Grounds London

33 Whites Grounds Estate Whites Grounds London

36 Whites Grounds Estate Whites Grounds London

39 Whites Grounds Estate Whites Grounds London

40 Whites Grounds Estate Whites Grounds London

37 Whites Grounds Estate Whites Grounds London

38 Whites Grounds Estate Whites Grounds London

25 Whites Grounds Estate Whites Grounds London

26 Whites Grounds Estate Whites Grounds London

23 Whites Grounds Estate Whites Grounds London

24 Whites Grounds Estate Whites Grounds London

27 Whites Grounds Estate Whites  
Grounds London

30 Whites Grounds Estate Whites  
Grounds London

31 Whites Grounds Estate Whites  
Grounds London

28 Whites Grounds Estate Whites  
Grounds London

29 Whites Grounds Estate Whites  
Grounds London

41 Whites Grounds Estate Whites  
Grounds London

53 Whites Grounds Estate Whites  
Grounds London

54 Whites Grounds Estate Whites  
Grounds London

51 Whites Grounds Estate Whites  
Grounds London

52 Whites Grounds Estate Whites  
Grounds London

55 Whites Grounds Estate Whites  
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58 Whites Grounds Estate Whites  
Grounds London

59 Whites Grounds Estate Whites  
Grounds London

56 Whites Grounds Estate Whites  
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57 Whites Grounds Estate Whites  
Grounds London

44 Whites Grounds Estate Whites  
Grounds London

45 Whites Grounds Estate Whites  
Grounds London

42 Whites Grounds Estate Whites  
Grounds London

43 Whites Grounds Estate Whites  
Grounds London

46 Whites Grounds Estate Whites  
Grounds London

49 Whites Grounds Estate Whites  
Grounds London

50 Whites Grounds Estate Whites  
Grounds London

47 Whites Grounds Estate Whites  
Grounds London

48 Whites Grounds Estate Whites  
Grounds London

9 Whites Grounds Estate Whites  
Grounds London

110 Whites Grounds Estate Whites  
Grounds London

111 Whites Grounds Estate Whites  
Grounds London

108 Whites Grounds Estate Whites  
Grounds London

109 Whites Grounds Estate Whites  
Grounds London

112 Whites Grounds Estate Whites  
Grounds London

78 Bermondsey Street London SE1 3UD

First Floor West 136-148 Tooley Street  
London

Ground Floor 136-148 Tooley Street  
London

First Floor 61 Bermondsey Street  
London

102 Whites Grounds Estate Whites  
Grounds London

91 Whites Grounds Estate Whites  
Grounds London

100 Whites Grounds Estate Whites  
Grounds London

103 Whites Grounds Estate Whites  
Grounds London

106 Whites Grounds Estate Whites  
Grounds London

107 Whites Grounds Estate Whites  
Grounds London

104 Whites Grounds Estate Whites  
Grounds London

105 Whites Grounds Estate Whites  
Grounds London

93 Whites Grounds Estate Whites  
Grounds London

19 Whites Grounds Estate Whites  
Grounds London

21 Whites Grounds Estate Whites  
Grounds London

15 Whites Grounds Estate Whites  
Grounds London

17 Whites Grounds Estate Whites  
Grounds London

3 Whites Grounds Estate Whites  
Grounds London

7 Whites Grounds Estate Whites  
Grounds London

8 Whites Grounds Estate Whites  
Grounds London

5 Whites Grounds Estate Whites  
Grounds London

6 Whites Grounds Estate Whites  
Grounds London

96 Whites Grounds Estate Whites  
Grounds London

97 Whites Grounds Estate Whites  
Grounds London

94 Whites Grounds Estate Whites  
Grounds London

95 Whites Grounds Estate Whites  
Grounds London

98 Whites Grounds Estate Whites  
Grounds London

11 Whites Grounds Estate Whites  
Grounds London

13 Whites Grounds Estate Whites  
Grounds London

99 Whites Grounds Estate Whites  
Grounds London

1 Whites Grounds Estate Whites  
Grounds London

Flat 2 79 Bermondsey Street London

Flat 3 79 Bermondsey Street London

60B Bermondsey Street London SE1  
3UD

Flat 1 79 Bermondsey Street London

Flat 4 79 Bermondsey Street London

Flat 7 79 Bermondsey Street London

Flat 8 79 Bermondsey Street London

Flat 5 79 Bermondsey Street London

Flat 6 79 Bermondsey Street London

Flat 5 Lantern House 2C Morocco Street

Flat 6 Lantern House 2C Morocco Street

Flat 3 Lantern House 2C Morocco Street

Flat 4 Lantern House 2C Morocco Street

Flat 10 1 Leathermarket Street London

Flat 7 1 Leathermarket Street London

Flat 8 1 Leathermarket Street London

Flat 11 1 Leathermarket Street London

Flat 2 Kamen House 17-21 Magdalen  
Street

Flat 14 Kamen House 17-21 Magdalen  
Street

Meeting Room 1 Fourth Floor 39-45  
Bermondsey Street London

Ground Floor Room 4 77 Weston Street  
London

Flat 8 More Copper House 14-16  
Magdalen Street

Flat 13 Artbrand House 7 Leathermarket  
Street

145 Guinness Court Snowsfields London

146 Guinness Court Snowsfields London

143 Guinness Court Snowsfields London

144 Guinness Court Snowsfields London

147 Guinness Court Snowsfields London

1 Black Swan Yard London SE1 3XW

4 Crucifix Lane London SE1 3JW

2 Crucifix Lane London SE1 3JW

Snowsfields Primary School Kirby Grove  
London

136 Guinness Court Snowsfields London

137 Guinness Court Snowsfields London

134 Guinness Court Snowsfields London

135 Guinness Court Snowsfields London

138 Guinness Court Snowsfields London

141 Guinness Court Snowsfields London

142 Guinness Court Snowsfields London

139 Guinness Court Snowsfields London

140 Guinness Court Snowsfields London

6 Melior Street London SE1 3QP

94 Bermondsey Street London SE1 3UB

Flat B 90 Bermondsey Street London

81 Bermondsey Street London SE1 3XF

96 Bermondsey Street London SE1 3UB

9 Fenning Street London SE1 3QR

Flat 3 94 Bermondsey Street London

Flat A 90 Bermondsey Street London

Flat 1 94 Bermondsey Street London

Flat 2 94 Bermondsey Street London

80A Bermondsey Street London SE1  
3UD

1 Tanner Street London SE1 3LE

Unit 1 7 Tyers Gate London

Horseshoe 26 Melior Street London

8 Crucifix Lane London SE1 3JW

133 Guinness Court Snowsfields London

87 Guinness Court Snowsfields London

88 Guinness Court Snowsfields London

85 Guinness Court Snowsfields London

86 Guinness Court Snowsfields London

89 Guinness Court Snowsfields London

92 Guinness Court Snowsfields London

93 Guinness Court Snowsfields London

90 Guinness Court Snowsfields London

91 Guinness Court Snowsfields London

78 Guinness Court Snowsfields London

79 Guinness Court Snowsfields London

76 Guinness Court Snowsfields London

77 Guinness Court Snowsfields London

80 Guinness Court Snowsfields London

83 Guinness Court Snowsfields London

84 Guinness Court Snowsfields London

81 Guinness Court Snowsfields London

82 Guinness Court Snowsfields London

94 Guinness Court Snowsfields London

126 Guinness Court Snowsfields London

127 Guinness Court Snowsfields London

124 Guinness Court Snowsfields London

125 Guinness Court Snowsfields London

128 Guinness Court Snowsfields London

131 Guinness Court Snowsfields London

132 Guinness Court Snowfields London	Flat 22 Lion Court 12 Shand Street
129 Guinness Court Snowfields London	Flat 26 Lion Court 12 Shand Street
130 Guinness Court Snowfields London	Flat 30 Lion Court 12 Shand Street
97 Guinness Court Snowfields London	Flat 31 Lion Court 12 Shand Street
98 Guinness Court Snowfields London	Flat 27 Lion Court 12 Shand Street
95 Guinness Court Snowfields London	Flat 29 Lion Court 12 Shand Street
96 Guinness Court Snowfields London	Flat 19 Lion Court 28 Magdalen Street
Flat 5 22 Leathermarket Street London	Flat 5 St Lukes Court 124-126 Tooley Street
Maisonette Second Floor And Third Floor 109 Bermondsey Street London	Flat 6 St Lukes Court 124-126 Tooley Street
Flat 6 16 Melior Street London	Flat 3 St Lukes Court 124-126 Tooley Street
Second Floor And Third Floor Flat 72 Bermondsey Street London	Flat 4 St Lukes Court 124-126 Tooley Street
Flat C Second Floor 2 Whites Grounds London	Flat 7 St Lukes Court 124-126 Tooley Street
Flat D Third Floor And Fourth Floor 2 Whites Grounds London	Flat 10 St Lukes Court 124-126 Tooley Street
Second Floor And Third Floor Flat 96 Bermondsey Street London	Flat 11 St Lukes Court 124-126 Tooley Street
Flat B First Floor 2 Whites Grounds London	Flat 8 St Lukes Court 124-126 Tooley Street
Unit 12 52 Bermondsey Street London	Flat 9 St Lukes Court 124-126 Tooley Street
Flat 3 Lion Court 12 Shand Street	Flat 28 Lion Court 28 Magdalen Street
Flat 35 Lion Court 12 Shand Street	154 Tooley Street London SE1 2TZ
Flat 32 Lion Court 12 Shand Street	Flat 20 Lion Court 28 Magdalen Street
Flat 33 Lion Court 12 Shand Street	Lion Court 28 Magdalen Street London
Flat 36 Lion Court 12 Shand Street	First To Third Floors And Attic 128 Tooley Street London
Flat 10 Lion Court 28 Magdalen Street	Flat 1 St Lukes Court 124-126 Tooley Street
Flat 11 Lion Court 28 Magdalen Street	Flat 2 St Lukes Court 124-126 Tooley Street
Flat 1 Lion Court 28 Magdalen Street	
Flat 2 Lion Court 28 Magdalen Street	
Flat 23 Lion Court 12 Shand Street	
Flat 25 Lion Court 12 Shand Street	
Flat 21 Lion Court 12 Shand Street	

Third Floor Shand House 14-20 Shand Street	47 Tyers Estate Bermondsey Street London
Fourth Floor Shand House 14-20 Shand Street	48 Tyers Estate Bermondsey Street London
Flat 2 80 Bermondsey Street London	45 Tyers Estate Bermondsey Street London
6 Carmarthen Place London SE1 3TS	46 Tyers Estate Bermondsey Street London
14 Bermondsey Street London SE1 2EG	49 Tyers Estate Bermondsey Street London
Unit 2 7-13 Melior Street London	52 Tyers Estate Bermondsey Street London
12 Melior Street London SE1 3QP	53 Tyers Estate Bermondsey Street London
Unit 6B 7 Tyers Gate London	50 Tyers Estate Bermondsey Street London
Railway Arch 6 Crucifix Lane London	51 Tyers Estate Bermondsey Street London
60A Weston Street London SE1 3QJ	38 Tyers Estate Bermondsey Street London
5A Tyers Gate London SE1 3HX	39 Tyers Estate Bermondsey Street London
Flat 1 80 Bermondsey Street London	36 Tyers Estate Bermondsey Street London
56-58 Weston Street London SE1 3QJ	37 Tyers Estate Bermondsey Street London
76A Bermondsey Street London SE1 3UD	40 Tyers Estate Bermondsey Street London
128 Tooley Street London SE1 2TU	43 Tyers Estate Bermondsey Street London
Flat 8 Lion Court 12 Shand Street	44 Tyers Estate Bermondsey Street London
Flat 9 Lion Court 12 Shand Street	41 Tyers Estate Bermondsey Street London
Flat 6 Lion Court 12 Shand Street	42 Tyers Estate Bermondsey Street London
Flat 7 Lion Court 12 Shand Street	66 Tyers Estate Bermondsey Street London
Flat 12 Lion Court 12 Shand Street	
Flat 16 Lion Court 12 Shand Street	
Flat 17 Lion Court 12 Shand Street	
Flat 13 Lion Court 12 Shand Street	
Flat 15 Lion Court 12 Shand Street	
29 Shand Street London SE1 2ES	
1 Magdalen Street London SE1 2EN	
Flat 5 Lion Court 12 Shand Street	
43 Barnham Street London SE1 2UU	
Flat 12 St Lukes Court 124-126 Tooley Street	

67 Tyers Estate Bermondsey Street  
London

64 Tyers Estate Bermondsey Street  
London

65 Tyers Estate Bermondsey Street  
London

68 Tyers Estate Bermondsey Street  
London

1 Tyers Estate Bermondsey Street  
London

10 Tyers Estate Bermondsey Street  
London

69 Tyers Estate Bermondsey Street  
London

70 Tyers Estate Bermondsey Street  
London

57 Tyers Estate Bermondsey Street  
London

58 Tyers Estate Bermondsey Street  
London

55 Tyers Estate Bermondsey Street  
London

56 Tyers Estate Bermondsey Street  
London

59 Tyers Estate Bermondsey Street  
London

62 Tyers Estate Bermondsey Street  
London

63 Tyers Estate Bermondsey Street  
London

60 Tyers Estate Bermondsey Street  
London

61 Tyers Estate Bermondsey Street  
London

35 Tyers Estate Bermondsey Street  
London

68 Bermondsey Street London SE1 3UD

88 Bermondsey Street London SE1 3UB

Woolpack 98 Bermondsey Street London

80 Bermondsey Street London SE1 3UD

14 Tyers Estate Bermondsey Street  
London

15 Tyers Estate Bermondsey Street  
London

99-101 Bermondsey Street London SE1  
3XB

13 Tyers Estate Bermondsey Street  
London

1 Melior Place London SE1 3SZ

Flat 13 St Lukes Court 124-126 Tooley  
Street

Flat 14 St Lukes Court 124-126 Tooley  
Street

47 Bermondsey Street London SE1 3XT

66 Weston Street London SE1 3QJ

79 Weston Street London SE1 3RS

Navigator House 4A Tyers Gate London

6 Crucifix Lane London SE1 3JW

16 Tyers Estate Bermondsey Street  
London

28 Tyers Estate Bermondsey Street  
London

29 Tyers Estate Bermondsey Street  
London

26 Tyers Estate Bermondsey Street  
London

27 Tyers Estate Bermondsey Street  
London

30 Tyers Estate Bermondsey Street  
London

33 Tyers Estate Bermondsey Street  
London

34 Tyers Estate Bermondsey Street  
London



31 Tyers Estate Bermondsey Street  
London

32 Tyers Estate Bermondsey Street  
London

19 Tyers Estate Bermondsey Street  
London

17 Tyers Estate Bermondsey Street  
London

18 Tyers Estate Bermondsey Street  
London

21 Tyers Estate Bermondsey Street  
London

24 Tyers Estate Bermondsey Street  
London

25 Tyers Estate Bermondsey Street  
London

22 Tyers Estate Bermondsey Street  
London

23 Tyers Estate Bermondsey Street  
London

Room 307 Guys Hospital Great Maze  
Pond

First To Third And Part Fourth And Fifth  
Floors And Meeting Room One On  
Fourth F 39-45 Bermondsey Street  
London

Flat 2 Crucifix Lane London

Second Floor New City Court Guys  
Hospital St Thomas Street

Unit 4B Arch 887 Railway Arches 888  
Holyrood Street

Flat 9A 79 Bermondsey Street London

Ground Floor Flat 52 Weston Street  
London

Bloomfield Clinic Guys Hospital St  
Thomas Street

Part Fourth Floor 39-45 Bermondsey  
Street London

Part Ground And First Floor 73 Weston  
Street London

Flat A 17A Magdalen Street London

Railway Arch 892 Holyrood Street  
London

The Skyroom 136-148 Tooley Street  
London

Flat B 17A Magdalen Street London

Railway Arch 891 Holyrood Street  
London

Flat 9B 79 Bermondsey Street London

Flat 7 28 Leathermarket Street London

Flat 8 28 Leathermarket Street London

Flat 5 28 Leathermarket Street London

Flat 6 28 Leathermarket Street London

Flat 9 28 Leathermarket Street London

Flat 5 54 Weston Street London

123 Snowfields London SE1 3ST

Sainsbury Outpatient Pharmacy  
Solomon Centre Guys Hospital St  
Thomas Street

82 St Thomas Street London SE1 3QU

Office A First Floor 7 Holyrood Street  
London

Office B First Floor 7 Holyrood Street  
London

Flat 3 28 Leathermarket Street London

Flat 4 28 Leathermarket Street London

Flat 1 28 Leathermarket Street London

Flat 2 28 Leathermarket Street London

Part First Floor 75 Weston Street London

Unit 31 54 Bermondsey Street London

Unit 11 56 Bermondsey Street London

Unit 11 54 Bermondsey Street London

Unit 21 54 Bermondsey Street London

Unit 21 56 Bermondsey Street London	Living Accommodation 98 Bermondsey Street London
Unit 31 56 Bermondsey Street London	
Medical School Borough Wing And Tabard Wing Guys Hospital Great Maze Pond	Flat 1 123 Snowsfields London
Unit 15 52 Bermondsey Street London	Apartment 17 36 Snowsfields London
Unit 21 52 Bermondsey Street London	Apartment 18 36 Snowsfields London
Unit 13 52 Bermondsey Street London	Apartment 15 36 Snowsfields London
Unit 14 52 Bermondsey Street London	Apartment 16 36 Snowsfields London
Unit 23 52 Bermondsey Street London	Apartment 19 36 Snowsfields London
Unit 33 52 Bermondsey Street London	Apartment 22 36 Snowsfields London
Unit 1 54 Bermondsey Street London	Apartment 23 36 Snowsfields London
Unit 24 52 Bermondsey Street London	Apartment 20 36 Snowsfields London
Unit 25 52 Bermondsey Street London	Apartment 21 36 Snowsfields London
Second Floor Natraj The Tannery Bermondsey Street	Apartment 8 36 Snowsfields London
Counting House Guys Hospital Great Maze Pond	Apartment 9 36 Snowsfields London
First Floor Natraj The Tannery Bermondsey Street	Apartment 6 36 Snowsfields London
Flat 3 Globe House 2A Crucifix Lane	Apartment 7 36 Snowsfields London
Part Ground And First Floor 75 Weston Street London	Apartment 10 36 Snowsfields London
Room 309 West Wing Nurses Home Guys Hospital Great Maze Pond	Apartment 13 36 Snowsfields London
Friends Of Guys Hospital Shop Guys Hospital Courtyard St Thomas Street	Apartment 14 36 Snowsfields London
Room 205 West Wing Nurses Home Guys Hospital Great Maze Pond	Apartment 11 36 Snowsfields London
29 Weston Street London SE1 3RR	Apartment 12 36 Snowsfields London
Living Accommodation Horseshoe 26 Melior Street	Apartment 24 36 Snowsfields London
Flat 2 Counting House Guys Hospital Great Maze Pond	Apartment 6 8 Melior Street London
First Floor Bramah House 65-71 Bermondsey Street	Apartment 9 8 Melior Street London
	Apartment 10 8 Melior Street London
	Apartment 7 8 Melior Street London
	Apartment 8 8 Melior Street London
	Apartment 27 36 Snowsfields London
	Apartment 28 36 Snowsfields London
	Apartment 25 36 Snowsfields London
	Apartment 26 36 Snowsfields London
	Apartment 29 36 Snowsfields London

Unit 1 8 Melior Street London  
 Apartment 30 36 Snowsfields London  
 Apartment 31 36 Snowsfields London  
 Apartment 5 36 Snowsfields London  
 Flat 4 83 Weston Street London  
 Flat 5 83 Weston Street London  
 Flat 2 83 Weston Street London  
 Flat 3 83 Weston Street London  
 Flat 3 85 Weston Street London  
 87 Weston Street London SE1 3RS  
 Flat 1 85 Weston Street London  
 Flat 2 85 Weston Street London  
 Flat 4 123 Snowsfields London  
 Flat 5 123 Snowsfields London  
 Flat 2 123 Snowsfields London  
 Flat 3 123 Snowsfields London  
 Snowsfield Yard 6-16 Melior Street London  
 Globe House 37 Bermondsey Street London  
 Flat 1 83 Weston Street London  
 London Farmers Market Guys Hospital St Thomas Street  
 Picks Organic Farm Guys Hospital St Thomas Street  
 Arch 4 Crucifix Lane London  
 Part First And Second Floors 7-13 Melior Street London  
 Ground Floor 58 Bermondsey Street London  
 Part 7-13 Melior Street London  
 Part Ground Floor 7-13 Melior Street London  
 36 Snowsfields London SE1 3SU

Unit 3 36 Snowsfields London  
 Apartment 4 36 Snowsfields London  
 Unit 1 36 Snowsfields London  
 Unit 2 36 Snowsfields London  
 Second Floor West 136-148 Tooley Street London  
 First Floor East 136-148 Tooley Street London  
 Arch 5 Crucifix Lane London  
 Ground Floor 61 Bermondsey Street London  
 Flat 12 1 Leathermarket Street London  
 Flat 20 70 Weston Street London  
 Guys Hospital St Thomas Street London  
 Flat 18 70 Weston Street London  
 Flat 19 70 Weston Street London  
 14 Melior Street London SE1 3QP  
 90 Bermondsey Street London SE1 3UB  
 14 Whites Grounds Estate Whites Grounds London  
 13 Snowsfields London SE1 3SU  
 19 Snowsfields London SE1 3SU  
 Flat 9 1 Leathermarket Street London  
 Flat 6 38 Snowsfields London  
 Flat 7 38 Snowsfields London  
 Flat 4 38 Snowsfields London  
 Flat 5 38 Snowsfields London  
 Flat 8 38 Snowsfields London  
 14A The Grain Store 70 Weston Street London  
 Railway Arch 22 Bermondsey Street London  
 Third Floor Flat 75 Weston Street London

6 Bridgewalk Heights 80 Weston Street  
London

First Floor Flat 109 Bermondsey Street  
London

First Floor Flat 96 Bermondsey Street  
London

First Floor Flat The Glasshouse 3 Melior  
Place

Flat 1 Globe House 2A Crucifix Lane

Flat 1 38 Snowsfields London

Flat 2 38 Snowsfields London

Flat 3 38 Snowsfields London

Flat 12 64 Weston Street London

Flat 2 8 Tyers Gate London

11 Tyers Estate Bermondsey Street  
London

Flat 7 Kamen House 17-21 Magdalen  
Street

Flat 8 Kamen House 17-21 Magdalen  
Street

Flat 5 Kamen House 17-21 Magdalen  
Street

Flat 6 Kamen House 17-21 Magdalen  
Street

Flat 9 Kamen House 17-21 Magdalen  
Street

Flat 12 Kamen House 17-21 Magdalen  
Street

Flat 13 Kamen House 17-21 Magdalen  
Street

Flat 10 Kamen House 17-21 Magdalen  
Street

Flat 11 Kamen House 17-21 Magdalen  
Street

Basement And Ground Floor 59  
Bermondsey Street London

Flat 3 Kamen House 17-21 Magdalen  
Street

Flat 4 Kamen House 17-21 Magdalen  
Street

Flat 1 Kamen House 17-21 Magdalen  
Street

Flat 26 Kamen House 17-21 Magdalen  
Street

Flat 27 Kamen House 17-21 Magdalen  
Street

Flat 24 Kamen House 17-21 Magdalen  
Street

Flat 25 Kamen House 17-21 Magdalen  
Street

Flat 28 Kamen House 17-21 Magdalen  
Street

Rooms 2 To 6 Second Floor 3-5  
Hardwidge Street London

Flat 29 Kamen House 17-21 Magdalen  
Street

Flat 30 Kamen House 17-21 Magdalen  
Street

Flat 17 Kamen House 17-21 Magdalen  
Street

Flat 18 Kamen House 17-21 Magdalen  
Street

Flat 15 Kamen House 17-21 Magdalen  
Street

Flat 16 Kamen House 17-21 Magdalen  
Street

Flat 19 Kamen House 17-21 Magdalen  
Street

Flat 22 Kamen House 17-21 Magdalen  
Street

Flat 23 Kamen House 17-21 Magdalen  
Street

Flat 20 Kamen House 17-21 Magdalen  
Street

Flat 21 Kamen House 17-21 Magdalen Street

First Floor 59-63 Bermondsey Street London

Laxmi The Tanneries 55 Bermondsey Street

Shakti The Tanneries 55 Bermondsey Street

Ground Floor Natraj The Tannery Bermondsey Street

Part Fifth Floor 39-45 Bermondsey Street London

The Hide Bar 39-45 Bermondsey Street London

Fifth Floor Part 39-45 Bermondsey Street London

Fourth Floor Part 39-45 Bermondsey Street London

Basement And Ground Floor Shiva The Tannery Bermondsey Street

First Floor And Second Floor Shiva The Tannery Bermondsey Street

Montessori 7-13 Melior Street London

Third Floor Shiva The Tannery Bermondsey Street

Ganesh The Tanneries 55 Bermondsey Street

Manasa The Tanneries 55 Bermondsey Street

Fourth Floor Shiva The Tannery Bermondsey Street

Sati The Tanneries 55 Bermondsey Street

First Floor To Third Floor Part Fourth And Part Fifth Floor 39-45 Bermondsey Street London

Third Floor 40 Bermondsey Street London

Ground Floor 103 Bermondsey Street London

First Floor 40 Bermondsey Street London

Second Floor 40 Bermondsey Street London

103 Bermondsey Street London SE1 3XB

Basement And Ground Floor 63 Bermondsey Street London

Second Floor 59-63 Bermondsey Street London

Second And Third Floor 61 Bermondsey Street London

First Floor 16 Crucifix Lane London

Ground Floor Room 1 77 Weston Street London

Second Floor 16 Crucifix Lane London

First Floor 122 Tooley Street London

Ground Floor 40 Bermondsey Street London

Ground Floor 16 Crucifix Lane London

73B Maltings Place London SE1 3LJ

Flat 1 Artbrand House 7 Leathermarket Street

Room 301 West Wing Nurses Home Guys Hospital Great Maze Pond

Room 318 Guys Hospital Great Maze Pond

Flat 4 West Wing Nurses Home Guys Hospital Great Maze Pond

Room 306 West Wing Nurses Home Guys Hospital Great Maze Pond

Room 206 West Wing Nurses Home Guys Hospital Great Maze Pond

Second Floor 2 Leathermarket Street London

Flat 3 Counting House Guys Hospital  
Great Maze Pond

Ground Floor 2 Leathermarket Street  
London

First Floor 2 Leathermarket Street  
London

52 Weston Street London SE1 3QJ

Arch 873 41 Barnham Street London

Arch 874 And Arch 875 41 Barnham  
Street London

Flat 1 54 Weston Street London

Flat 4 54 Weston Street London

Ground Floor 47 Bermondsey Street  
London

Flat 2 54 Weston Street London

Flat 3 54 Weston Street London

Flat 1 More Copper House 14-16  
Magdalen Street

Flat 13 More Copper House 14-16  
Magdalen Street

Flat 14 More Copper House 14-16  
Magdalen Street

Flat 11 More Copper House 14-16  
Magdalen Street

Flat 12 More Copper House 14-16  
Magdalen Street

Student Accommodation Wolfson House  
49 Weston Street

Unit 11 52 Bermondsey Street London

Swimming Pool Wolfson House 49  
Weston Street

Medical School Southwark Wing Guys  
Hospital Great Maze Pond

Flat 4 More Copper House 14-16  
Magdalen Street

Flat 5 More Copper House 14-16  
Magdalen Street

Flat 2 More Copper House 14-16  
Magdalen Street

Flat 3 More Copper House 14-16  
Magdalen Street

Flat 6 More Copper House 14-16  
Magdalen Street

Flat 9 More Copper House 14-16  
Magdalen Street

Flat 10 More Copper House 14-16  
Magdalen Street

Flat 7 More Copper House 14-16  
Magdalen Street

Flat 14 Artbrand House 7 Leathermarket  
Street

Flat 11 Artbrand House 7 Leathermarket  
Street

Flat 12 Artbrand House 7 Leathermarket  
Street

Unit A Artbrand House 7 Leathermarket  
Street

Railway Arches 895 And 896 Holyrood  
Street London

Kamen House 22 Magdalen Street  
London

Unit B Artbrand House 7 Leathermarket  
Street

Unit 1 8 Tyers Gate London

Flat 4 Artbrand House 7 Leathermarket  
Street

Flat 5 Artbrand House 7 Leathermarket  
Street

Flat 2 Artbrand House 7 Leathermarket  
Street

Flat 3 Artbrand House 7 Leathermarket  
Street

Flat 6 Artbrand House 7 Leathermarket  
Street

Flat 9 Artbrand House 7 Leathermarket Street

Flat 10 Artbrand House 7 Leathermarket Street

Flat 7 Artbrand House 7 Leathermarket Street

Flat 8 Artbrand House 7 Leathermarket Street

Kamen House 23 Magdalen Street London

Flat 3B 16 Crucifix Lane London

Flat 4A 16 Crucifix Lane London

Flat 3A 16 Crucifix Lane London

Flat 4B 16 Crucifix Lane London

73C Maltings Place London SE1 3LJ

Ground Floor 122 Tooley Street London

Flat 2 1 Shand Street London

Flat 3 1 Shand Street London

Flat 1 1 Shand Street London

Flat 4 1 Shand Street London

33 Bermondsey Street London SE1 2EG

58 Bermondsey Street London SE1 3UD

Flat 5 1 Shand Street London

160 Tooley Street London SE1 2QH

3 Raquel Court 147 Snowsfields London

4 Raquel Court 147 Snowsfields London

1 Raquel Court 147 Snowsfields London

2 Raquel Court 147 Snowsfields London

6 Raquel Court 147 Snowsfields London

9 Raquel Court 147 Snowsfields London

10 Raquel Court 147 Snowsfields London

7 Raquel Court 147 Snowsfields London

8 Raquel Court 147 Snowsfields London

Flat 5 7 Tyers Gate London

Flat 6 7 Tyers Gate London

12 Whites Grounds Estate Whites Grounds London

22 Whites Grounds Estate Whites Grounds London

2 Whites Grounds Estate Whites Grounds London

11 Raquel Court 147 Snowsfields London

76 Bermondsey Street London SE1 3UD

First Floor 4-8 Whites Grounds London

Second Floor 4-8 Whites Grounds London

Ground Floor Right 3-5 Hardwidge Street London

Ground Floor Left 3-5 Hardwidge Street London

5 Raquel Court 147 Snowsfields London

Fashion And Textile Museum 83 Bermondsey Street London

Fourth Floor 9 Holyrood Street London

Ground Floor 4-8 Whites Grounds London

Flat 4 7 Tyers Gate London

First Floor 9 Holyrood Street London

Ground Floor 9 Holyrood Street London

Second Floor 7 Holyrood Street SE1 2EL

Basement 9 Holyrood Street London

Second Floor 9 Holyrood Street London

Third Floor 22 Shand Street London

Third Floor 9 Holyrood Street London

Bermondsey Village Hall Kirby Grove London

Flat 2 Globe House 2A Crucifix Lane

Part Basement And Part Ground Floor 46-50 Bermondsey Street London	Flat 12 22E Leathermarket Street London
Ground Floor 82-86 Bermondsey Street London	Flat 13 22E Leathermarket Street London
First Floor 1-7 Fenning Street London	22D Leathermarket Street London SE1 3HP
Basement 7 Holyrood Street London	22B Leathermarket Street London SE1 3HP
Ground Floor 7 Holyrood Street SE1 2EL	Flat 14 22E Leathermarket Street London
Ground Floor 1-7 Fenning Street London	Fourth Floor 7 Holyrood Street London
Unit 7 Railway Arches 881 882 882W Holyrood Street	Ground Floor / 3C Online Raquel Court 147 Snowsfields
14 Ship And Mermaid Row London SE1 3QN	Ground Floor Rooms 2 And 3 77 Weston Street London
3A Bridgewalk Heights 80 Weston Street London	15 Hardwidge Street London SE1 3SY
Sixth Floor And Seventh Floor Capital House 42 Weston Street	The Wine And Spirit Trade Association Ltd 39-45 Bermondsey Street London
Unit 1 72 Weston Street London	Part Ground Floor 17 Hardwidge Street London
Flat 2 99 Bermondsey Street London	17 Hardwidge Street London SE1 3SY
Flat 2 7 Tyers Gate London	4 Carmarthen Place London SE1 3TS
Flat 1 99 Bermondsey Street London	2 Carmarthen Place London SE1 3TS
Basement And Ground Floor 130-132 Tooley Street London	81 Weston Street London SE1 3RS
First Floor And Second Floor 130-132 Tooley Street London	Munro Clinic Snowsfields London
Basement To Third Floor 37-37A Snowsfields London	Flat 14 22 Leathermarket Street London
West Wing Nurses Home Guys Hospital Great Maze Pond	Third Floor 4-8 Whites Grounds London
Third Floor And Fourth Floor 130-132 Tooley Street London	Flat 12 22 Leathermarket Street London
Flat 4 8 Tyers Gate London	Flat 13 22 Leathermarket Street London
Second To Fifth Floors Capital House 42 Weston Street	First Floor Flat 72 Bermondsey Street London
Flat 3 7 Tyers Gate London	Third Floor Bramah House 65-71 Bermondsey Street
Flat 3 8 Tyers Gate London	Fourth Floor Bramah House 65-71 Bermondsey Street



Ground Floor To Second Floor 22 Shand Street London

Ground Floor Bramah House 65-71 Bermondsey Street

Flat 3 22 Leathermarket Street London

Flat 4 22 Leathermarket Street London

Flat 1 22 Leathermarket Street London

Flat 2 22 Leathermarket Street London

Flat 6 22 Leathermarket Street London

Flat 10 22 Leathermarket Street London

Flat 11 22 Leathermarket Street London

Flat 7 22 Leathermarket Street London

Flat 8 22 Leathermarket Street London

Ground Floor 48-50 Weston Street London

Flat 3 16 Melior Street London

Flat 4 16 Melior Street London

Flat 1 16 Melior Street London

Flat 2 16 Melior Street London

Flat 5 16 Melior Street London

Second Floor Bramah House 65-71 Bermondsey Street

Ground Floor 72 Bermondsey Street London

Arthurs Mission Hall Snowsfields London

Atrium 2 Guys Hospital St Thomas Street

Third Floor 7 Holyrood Street London

Flat 9 22 Leathermarket Street London

Second Floor East 136-148 Tooley Street London

Flat 7 Lantern House 2C Morocco Street

60 Bermondsey Street London SE1 3UD

60A Bermondsey Street London SE1 3UD

2B Morocco Street London SE1 3HB

Lantern House 102 Bermondsey Street London

Flat 9 79 Bermondsey Street London

Flat 9 70 Weston Street London

Flat 4 1 Leathermarket Street London

Flat 5 1 Leathermarket Street London

4 Whites Grounds Estate Whites Grounds London

30 Snowsfields London SE1 3SU

6 Tyers Gate London SE1 3HX

Fourth Floor 18-20 Crucifix Lane London

Flat 10 70 Weston Street London

Flat 7 70 Weston Street London

Flat 8 70 Weston Street London

Flat 11 70 Weston Street London

Flat 15 70 Weston Street London

Flat 16 70 Weston Street London

Flat 12 70 Weston Street London

Flat 14 70 Weston Street London

Flat 2 72 Weston Street London

10 Crucifix Lane London SE1 3JW

16 Hardwidge Street London SE1 3SY

75 Bermondsey Street London SE1 3XF

14 Crucifix Lane London SE1 3JW

Flat 5 70 Weston Street London

Flat 6 70 Weston Street London

7 Morocco Street London SE1 3HB

73A Weston Street London SE1 3RS

Flat 2 Lantern House 2C Morocco Street

Flat 2 4B Tyers Gate London

Flat 3 4B Tyers Gate London

Flat 1 4B Tyers Gate London	First Floor 8 Holyrood Street London
Flat 4 4B Tyers Gate London	Second Floor 8 Holyrood Street London
Flat 1 1 Leathermarket Street London	5 Holyrood Street London SE1 2EL
Flat 2 1 Leathermarket Street London	Basement And Ground Floor 8 Holyrood Street London
Flat 5 4B Tyers Gate London	Railway Arches 6 To 11 Crucifix Lane London
Flat 6 4B Tyers Gate London	7 Crucifix Lane London SE1 3JW
92 Bermondsey Street London SE1 3UB	Basement And Ground Floor 109 Bermondsey Street London
42-44 Bermondsey Street London SE1 3UD	2-3 Black Swan Yard London SE1 3XW
51-57 St Thomas Street London SE1 3QX	11 Crucifix Lane London SE1 3JW
107 Bermondsey Street London SE1 3XB	First Floor 18-20 Crucifix Lane London
The York Clinic 47 Weston Street London	Second Floor 18-20 Crucifix Lane London
Flat 3 1 Leathermarket Street London	13 Crucifix Lane London SE1 3JW
Flat 4 72 Weston Street London	Ground Floor 18-20 Crucifix Lane London
Flat 5 72 Weston Street London	Third Floor 8 Holyrood Street London
First Floor 77 Weston Street London	Second Floor Shand House 14-20 Shand Street
Flat 3 72 Weston Street London	40-40A Snowsfields London SE1 3SU
Flat 6 72 Weston Street London	Ground Floor Shand House 14-20 Shand Street
106A Weston Street London SE1 3QB	First Floor Shand House 14-20 Shand Street
Flat 1 Lantern House 2C Morocco Street	42-42A Snowsfields London SE1 3SU
Flat 7 72 Weston Street London	80-82 St Thomas Street London SE1 3QU
Flat 8 72 Weston Street London	Hodgkin Building Guys Hospital St Thomas Street
105 Bermondsey Street London SE1 3XB	Block K 106 Guinness Buildings Snowsfields
Flat 17 70 Weston Street London	Unit 4A Railway Arches 887 Holyrood Street
Sixth Floor 18-20 Crucifix Lane London	
First Floor 3-5 Hardwidge Street London	
Third Floor 18-20 Crucifix Lane London	
Fifth Floor 18-20 Crucifix Lane London	
Second Floor 3-5 Hardwidge Street London	

Unit 3 Railway Arches 889 And 890  
Holyrood Street

Unit 6 Railway Arches 883 And 884  
Holyrood Street

Unit 5 Railway Arches 885 And 886  
Holyrood Street

Unit 1 Railway Arches 893 And 894  
Holyrood Street

Basement Shand House 14-20 Shand  
Street

Railway Arches 897 And 898 Holyrood  
Street London

Railway Arch 899 Holyrood Street  
London

20 Whites Grounds Estate Whites  
Grounds London

70 Bermondsey Street London SE1 3UD

16 Whites Grounds Estate Whites  
Grounds London

18 Whites Grounds Estate Whites  
Grounds London



## Appendix 5: Consultation responses received

### Internal services

Ecology

Archaeology

Design and Conservation Team

Urban Forester

Flood Risk Management & Urban Drainage

Highways Development and Management

Environmental Protection

Transport Policy

### Statutory and non-statutory organisations

Environment Agency

Transport for London

Network Rail

London Underground

Metropolitan Police Service (Designing Out Crime)

Natural England - London & South East Region

Thames Water

### Neighbour and local groups:

Flat 5 40 Snowfields London

8 Tyers Estate Bermondsey Street  
London

15 Snowfields London SE1 3SU

1 Leathermarket Street London SE1  
3HN

Flat 3 79 Bermondsey Street London

Flat 78 St Saviours Wharf 8 Shad  
Thames London

26 Toronto House Surrey Quays Road  
London

7 Fournier Street Spitalfields London

130 Cherry Crescent Rawtenstall BB4  
6DS

26 Friary Court St Johns Woking

133 Guinness Court Snowsfields London

Apartment 25 36 Snowsfields London

18 Gervase Street London SE15 2RS

Texas Joe's 8-9 Snowsfields London

Apt 50 Taper Building 175 Long Lane  
London

Apartment 50 175 Long Lane London

8 Holyrood Street London

Flat 8 36 Snowsfields London

Road London SE1 2RN

47 Burwash House Weston Street  
London

79 Bermondsey Street London SE1 3XF

10 Crucifix Lane London

Flat 4 The Morocco Store Leathermarket  
Street London

28 Sutherland Square London SE17  
3EQ

210 Merrow Street London SE17 2NX

10 Chapter Road London SE17 3ET

8 Exon Street London SE17 2JW

6 Sister Mabels Way London SE15 6UL

81A Lytham Street London SE17 2NN

5 Glengall Terrace London SE15 6NW

97 Coleman Road London SE5 7TF

8 Poole Road Egremont Wallasey

20 Scrutton Close London SW12 0AW

7 St Anthonys Close London E1W1LT

Flat 30 Florin Court 70 Tanner Street  
London

Flat 36, Rochfort House Grove Street  
London

Magdalen House 148 Tooley Street  
London

3 The Tabard Centre Prioress St London

Unit 52.11, Woolyard 52 Bermondsey  
Street London

Flat 602, Block A 27 Green Walk London

First Floor 145 Bermondsey Street  
London

49 Rye Lane London SE155ET

Flat 13 1A St Rule Street London

12 Pope St London SE1 3PR

44 - 48 Old Brompton Road,  
LONDON SW7 3DY London SW7 3DY

Flat 4, 37 Tanner Street London SE1  
3LF

4 Staunton House Tatum Street London

59 Pages Walk London SE1 4HD

405 Arum House 46 Rodney Road  
London

St Saviours Wharf 25 Mill Street London

18 Trinity Street Flat 1 London

103 Leathermarket Court London  
SE13HT

93 Iliffe St London SE17 3LL

251 Cromwell Lane Kenilworth CV8 1PN

Flat 19, Hungerford House, Churchill  
Gardens, Pimlico London

London

86 Corio House 12 The Grange London

23 Danecroft Road Herne Hill London

30 Tennyson Road Gillingham ME7 5QD

1 Priory Gardens Bedford Park London

Via Email X

39-45 Bermondsey Street SE1 3XF

Flat 11 Raquel Court 147 Snowfields

21 Cannock Court Walthamstow E17  
4GD

57 Avondale Road London N15 3SR

Flat 7 Raquel Court 147 Snowfields

Avison Young 65 Gresham Street  
London

6 Bedford Road Tunbridge Wells TN4  
0HJ

Flat 7, 12-14 Thirlmere Road Finchley  
London

120 Weston Street London SE1 4GS

Flat 7, 5 Plantain Place London SE1  
1YN

3 Raquel Court 147 Snowfields London

2 Raquel Court 147 Snowfields London

9 Raquel Court 147 Snowfields London

11 Raquel Court 147 Snowfields  
London

Ground Floor / 3C Online Raquel Court  
147 Snowfields

Flat 4 1 Leathermarket Street London

10 Crucifix Lane London SE1 3JW

7 Hestia House City Walk London

134 Jerningham Road New Cross Gate  
London

Flat 24 Thetford House Maltby Street,  
Bermondsey, London, SE1 3PE London

Unit 5, 7 Tyers Gate London SE1 3HX

Swains Cottage Tismons Common  
Rudgwick

14 Woodmill Street London SE16 3GG

1 Black Swan Yard London SE1 3XW

Central Buildings London SE24 9QJ

Flat 4 The Morocco Store 1  
Leathermarket Street London

38 Guildford Grove London

55 Bermondsey Street London SE1 3XN

2A Crucifix Lane, Flat 2 London SE1  
3JW

6 Lincoln Road London E7 8QW

10 crucifix lane London Se13jw

3 Antonine Heights City Walk London

167 Clapham Road London SW9 0PU

Flat 3 4 Archie St London

37, Bermondsey Street London  
SE13JW

The Tanneries 55 Bermondsey Street  
London

23 Shrewsbury Mews London W2 5PN

Flat 1905 Arena Tower 25 Crossharbour  
Plaza London

Studio 3 Neckinger Mills London

59 PAGES WALK LONDON

Apt 10 The Morocco Store 1  
Leathermarket Street London

Apartment 1602 251 Southwark Bridge  
Road London

Raquel Court 147 Snowfields London

Flat 63 Banner House Roscoe Street  
Banner House London

13 crucifix lane London London

1 Woods Place London Se1 3BS

Flat 23 9 arts lane London Se16 3gb

4B Tyers Gate London SE1 3HX

30 Whites Grounds Estate London SE1  
3JZ

46 Ockham Building 10 Limasol St  
London

Flat 11 3 Leathermarket Street London  
 Globe House Flat 3 2A Crucifix Lane  
 London  
 10 Sandover House 124 Spa Road  
 London  
 Oakhurst Ropers Lane Wroughton  
 10 crucifix lane London Se1 3jw  
 10 Crucifix Lane London se1 3jw  
 41 Station Crescent London N16 5BG  
 35 London SE16 5NW  
 40A Maltings Place Tower Bridge Road  
 London  
 Apartment 50 Taper Building 175 Long  
 Lane London  
 Porter building 130 Spa Road London  
 8 Cassilis Road TWICKENHAM TW1  
 1RU  
 2 tyers gate Flat 7 London  
 2a crucifix lane London SE1 3JW  
 106 arc house 16 maltby street London  
 136 Bermondsey Street London SE1  
 3TX  
 Flat 18 Three Bridges 22-28 Whites  
 Grounds London  
 6 Heathlands Tadworth KT20 5RA  
 187 Bermondsey Street London SE1  
 3UW  
 82, Belgrave Road London E113QP  
 214 bermondsey street apartment 20  
 london  
 11 Queen's Drive London N42SZ  
 Flat 3 2 Tyers Gate London  
 Flat 8 3 Market Yard Mews London  
 Flat 45 Florin court 70 Tanner street  
 London

Flat 7 Venture Court 206 Bermondsey  
 Street London  
 108 Vesta court London Se13bp  
 Arthur's Mission, 30 Snowsfields London  
 SE1 3SU  
 25 Whitmore Building 3 Arts Lane  
 London  
 14 crucifix lane London Se1 3jw  
 Flat 7 84 Abbey Street London  
 cumberland mansions nutford place  
 LONDON  
 2 Archie Street London SE1 3JT  
 Apartment 33 1 New Tannery Way  
 London  
 Flat 7 Ockham Building 9 Arts Lane  
 London  
 Ground and Lower Ground floor  
 maisonette 97 Camberwell Grove London  
 48 Eyot House London SE16 4BN  
 224 LONG LANE LONDON SE1 4QB  
 2a crucifix lane globe house London  
 Se13jw  
 10 crucifix lane London Se13jw  
 1 cottages Market yard mews London  
 24 Goldhurst Terrace London NW6 3HU  
 Flat 6, 2 Tyers Gate London SE1 3HX  
 Flat 10, Tomson House, St. Saviours  
 Estate, Tomson House Tomson House  
 London  
 Flat 42 12 Bermondsey Sq London  
 unit 6 139-143 bermondsey street london  
 167 Bermondsey street London SE1  
 3UF  
 2nd Floor, 147 Bermondsey Street  
 LONDON SE1 3UW



19 Babbage court Cooks road London  
 7, Quadrangle Close Leroy Street  
 London  
 60 Weston Street London SE1 3QJ  
 12 Pope Street London SE1 3PR  
 25 Warren Ave Richmond TW10 5DZ  
 Flat 42 12 Bermondsey Square London  
 16 Snowfields London SE1 3SU  
 Flat 12, 22E Leathermarket Street  
 London SE1 3HP  
 80A Courthill Road London SE13 6HA  
 249 Bermondsey St London Se1 3uq  
 33 Fendall Street Bermondsey se1 3fx  
 Arch 6, Unit 5 Crucifix Lane London SE1  
 3JW  
 Railway Arch 6 Crucifix Lane London  
 Flat 7 - Venture Court 206 Bermondsey  
 street London  
 25 Costermonger Building 10 Arts Lane  
 London  
 Clevelands, The Street The Street  
 Benenden  
 25 COSTERMONGER BUILDING 10  
 ARTS LANE LONDON  
 46/5 Mill Street Bermondsey SE1 2DE  
 1, Haven Way Flat 534 London  
 CUMBERLAND MANSIONS NUTFORD  
 PLACE LONDON  
 9 Cocoa Mill Apartments 1 Sugar Lane  
 London  
 Flat 23 Ockham Building London SE16  
 3GB  
 Flat 30 Whitmore Building 3 Arts Lane  
 London  
 The Loft 147 Bermondsey Street London

16 Whitmore Building 3 Arts Lane  
 London  
 Flat 3 168 Tower Bridge rd London  
 5 Merchant Square London W2 1AS  
 12 Wordsworth Road London SE1 5TX  
 10 Arts Lane London SE163GA  
 Flat 34 Whitmore Building 3 Arts Lane  
 London  
 22 Leathermarket Street London SE1  
 3HP  
 Flat 50 Ockham Building 10 Limasol  
 Street London  
 20 Codrington Court 243 Rotherhithe  
 Street London  
 56 Pennethorne Road, Peckham  
 Peckham London  
 Flat 2 Victoria Court 8 Hendre Road  
 London  
 Flat 5 79 Bermondsey Street London  
 7 Tyers Estate Bermondsey Street  
 London  
 66 Corio House 12 The Grange London  
 10 arts lane London SE163GA  
 Flat 10 The Morocco Store 1-3  
 Leathermarket Street London  
 Flat 8 22 Leathermarket Street London  
 12 Pope Street London  
 Flat 211 Pacific Wharf 165 Rotherhithe  
 Street London  
 Flat 10 The Morocco Store 1-3  
 Leathermarket Street London  
 14 Bermondsey Exchange 179 - 181  
 Bermondsey Street LONDON  
 108 Vesta Court City Walk London

229 Long Lane Apartment H London  
 229 Long Lane London Se1 4pr  
 2 A Crucifix Lane London SE13 JW  
 2 Lytham Street London SE17 2PN  
 Flat 5 2 Archie Street London  
 16 Maltby Street London SE1 3GP  
 11 Bell Yard Mews London SE1 3TN  
 18 Tyers Estate Bermondsey SE13JG  
 216 Grange Road London SE1 3AA  
 Lincoln Tower 77 Westminster Bridge  
 Road London  
 Flat 6, Block A 22-28 Whites Grounds  
 Bermondsey  
 1st floor flat 147 Bermondsey Street  
 London  
 Flat 6, Tanner House, Tanner Street  
 Tanner Street London  
 Flat 6, 167 Bermondsey Street London  
 SE1 3UF  
 Flat 2, 143 Leman Street London E1  
 8EY  
 51 Whites grounds London  
 Squirrels Wood Eyhurst Close  
 Kingswood  
  
 Flat 19 Bermondsey Exchange 179-181  
 Bermondsey Street London  
 14 crucifix lane London Se1 3jw  
 Flat 7 22 Leathermarket Street  
 Bermondsey SE1 3HP London SE1 3HP  
 147 Bermondsey Street London Se1  
 3uw  
 22 Twist House 38 Grange road  
 Southwark  
  
 1 Hatchers Mews London SE1 3GS  
 Unit B, Renaissance Court 120  
 Bermondsey Street London  
 Flat 48 Eyot House Marine Street  
 London  
 unit 6 139-143 bermondsey street london  
 4B Tyers Gate London SE1 3HX  
 Flat 35 Lion Court, 12 Shand Street  
 London SE1 2EP  
 14 Woodmill Street London SE16 3GG  
 Play Consulting 55 Bermondsey Street  
 London  
 62E Trinity Church Square London  
 SE14HT  
 Globehouse, 2A Crucifix Lane London  
 SE1 3JW  
 2a Crucifix Lane London SE1 3JW  
 44 lansdowne road London N102AU  
 16B Muschamp Raod London SE15 4EF  
 51 Whites grounds London  
 10 Sycamore Court Royal Oak Yard  
 London  
 2a Crucifix Lane London SE13JW  
 14 Jamaica Rd, Bermondsey, London  
 SE1 2RN london SE1 2RN  
 flat 1 globe house 2a crucifix lane london  
 17 Blue Lion Place London SE14PU  
 15 Snowfields London Bridge London  
 Flat 3 Globe House 2A Crucifix Lane  
 London  
 Flat 2, 4b Tyers Gate London SE1 3HX  
 Apt 21 36 Snowfields London  
 16 Snowfields London SE1 3SU  
 Unit 5 7 Tyers Gate London  
 1 Leathermarket Street London SE1  
 3HN

Sunnyside Chorleywood Road  
Rickmansworth

Flat 2, Gemini House 180-182  
Bermondsey Street London

6 Lincoln Road London E7 8QW

7 Tyers Estate Bermondsey Street  
London

14 Janeway Street London London

Globe House, 2A Crucifix Lane London  
SE1 3JW

47 burwash house Weston Street  
London

12 Elm Court Royal Oak Yard London

Unit 6 139-143 Bermondsey Street  
London

Flat 42 12 Bermondsey Square London

2a Crucifix Lane London SE1 3JW

1 Goodwin Close London SE16 3TR

197 Long Lane Flat 34 LONDON

Flat A 144 Abbey Street London

Flat 6 4B Tyers Gate London

Flat 1 4B Tyers Gate London

55 Bermondsey Street London SE1 7HA

3-5 Harwidge Street London SE1 3SY

Flat 24, Damory House Abbeyfield  
Estate London

47 Burwash House Weston Street  
London

5 Cook Court 151a Rotherhithe Street  
London

59 Pages Walk London SE1 4HD

Flat 601, Cinnamon Wharf 24 Shad  
Thames London

18a Wilds Rents London SE1 4QG

59 Pages Walk London Se1 4hd

176

B206 Jam Factory 27 Green Walk  
London

Flat 306 83 Crampton Street London

6 Tanner House Tanner Street London

18 Tyers Estate London SE1 3JG

9 New Amelia Apartments 171 Abbey  
Street London

3 Antonine Heights, City Walk London  
SE1 3DB

160 Tooley Street Southwark London

160 Tooley Street Southwark London

160 Tooley Street Southwark London

160 Tooley Street Southwark London

33 Alma Grove London SE1 5PY

12 Wordsworth Road London SE1 5TX

Unit 12c Tower Workshops 58 Riley  
Road London

10 Crucifix Lane London Se13jW

FLAT 1 1 LEATHERMARKET STREET  
LONDON

160 Tooley Street London Southwark

Grange House London Se1 3dt

Flat 3 Printworks Apartments 230 Long  
Lane UK-LONDON

160 Tooley Street Southwark London

Flat 29 130 Spa Road London

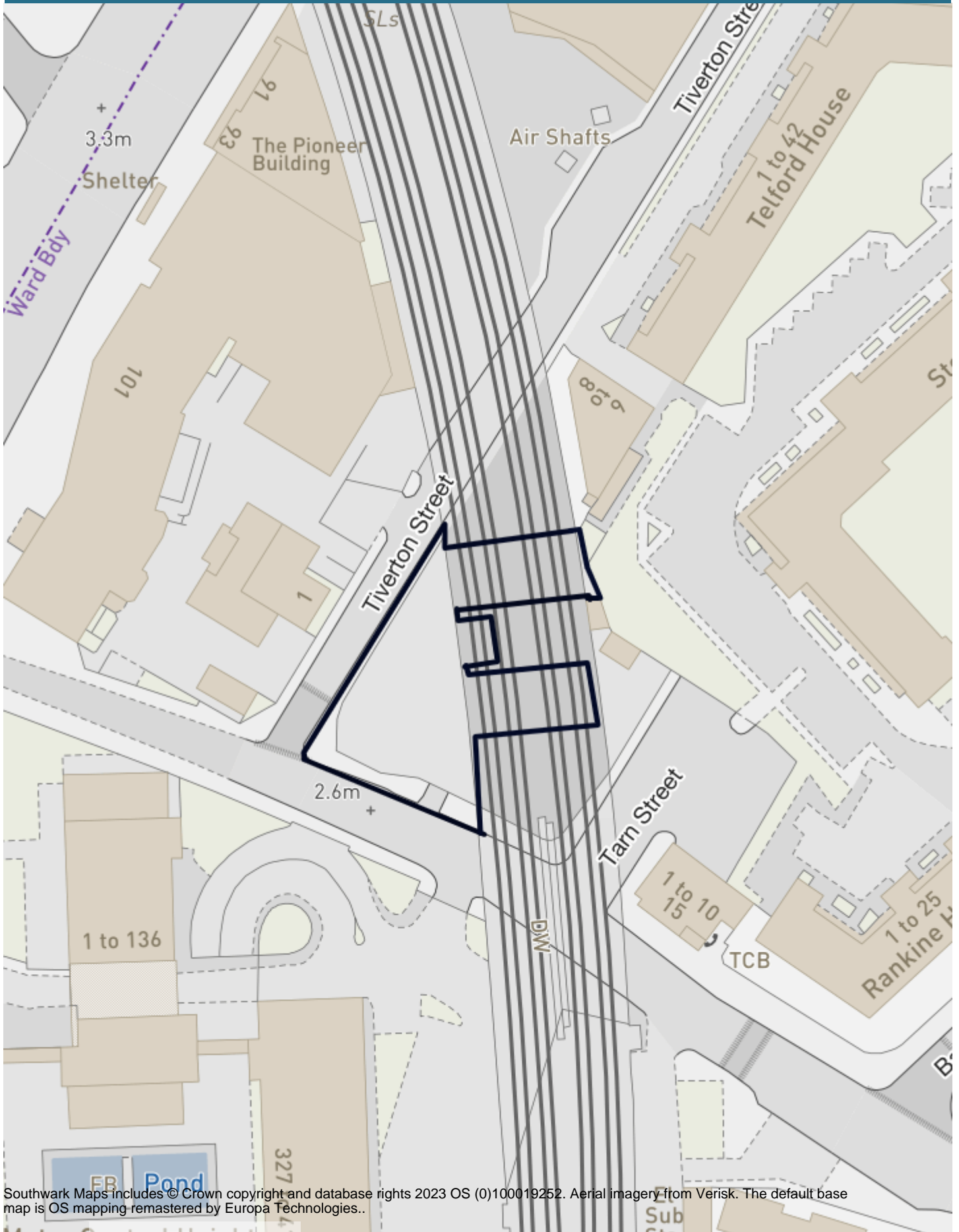
59 Page's Walk London SE1 4HD

Flat 218, Caraway Apartments 2  
Cayenne Court London

Flat 4, The Morocco Store 1  
Leathermarket Street London

79 Bermondsey street Flat 3 London





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<b>Item No.</b>	<b>Classification:</b>	<b>Date:</b>	<b>Meeting Name:</b>
6.2	OPEN	24 April 2022	Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 22/AP/1068 for: Full Planning Permission  <b>Address:</b> 5-9 Rockingham Street and 2-4 Tiverton Street, London, SE1 6PF  <b>Proposal:</b> Redevelopment of site to provide a 24-storey building plus basement and mezzanine consisting of purpose-built student accommodation (Sui Generis), and commercial uses (Use Class E) at ground floor, and the development of the associated railway arches to provide commercial space (Use Class E), plant, refuse and cycle storage, and associated access and public realm works.		
<b>Ward(s) or groups affected:</b>	Chaucer		
<b>From:</b>	Director of Planning and Growth		
<b>Application Start Date</b>	24.03.2022	<b>Application Expiry Date</b>	23.06.2022
<b>Earliest Decision Date</b>	11.08.2022	<b>Extension of Time End Date</b>	24.10.2023

## RECOMMENDATION

1.
  - a) That full planning permission be granted for 22/AP/1068, subject to conditions, referral to the Mayor of London and the applicant entering into a satisfactory legal agreement.
  - b) That in the event that the legal agreement is not been entered into by 24th October 2023 the Director of Planning and Growth be authorised to refuse planning permission for 22/AP/1068, if appropriate, for the reasons set out in paragraph 517 of this report.

## EXECUTIVE SUMMARY

2. Located in Elephant and Castle and occupying a position close to London South Bank University and the London College of Communication, the application site is in the Major Town Centre, the Central Activities Zone and an Opportunity Area. It comprises a vacant triangular plot of land and the three adjacent railway arches. Nearby to the southwest is Metro Central Heights, a Grade II listed building, with the nearest conservation area at a distance of approximately 250 metres. The site forms part of the Low Line, a vision promoted by the Council for a non-vehicular public realm corridor weaving through the borough adjacent to its historic railway arches.



3. This application proposes the construction of a 24-storey building with basement to provide 244 student bedspaces and 67 square metres of flexible commercial space (Classes E[a], E[b] and E[c]), involving the redevelopment and activation of three railway arches, all supported by associated cycle storage, waste/recycling stores and new public realm.
4. The application site benefits from planning permission under 19/AP/0750, which was technically implemented in early 2023, to deliver an office-led 21-storey scheme. While the scheme proposed by 22/AP/1068 would be of a different use and architectural design to the implemented scheme, it would be no taller. Furthermore, the footprint of each storey would not, with the exception of the corners, be larger than the counterpart storeys in the implemented scheme. The building envelope established by 19/AP/0750 is a material consideration in the determination of planning application 22/AP/1068.
5. The proposed student housing development would be a direct-let scheme (i.e. not linked to any specific university or college) and would not include any affordable student rooms. Instead, the application proposes to prioritise the delivery of general needs affordable housing in the borough, which would be provided in the form of a payment-in-lieu of £8.54 million because it is not practical to include on-site conventional housing alongside a feasible amount of student housing on this relatively small site. This payment-in-lieu is equivalent to 35% affordable housing, with a 'collar' applied to potentially provide above 35% by the point in time the contribution has been paid in full, which the Council's expert assessor has deemed to be reasonable. The payment-in-lieu could potentially be used to directly support the delivery of affordable housing close to the application site, thereby bringing tangible benefits for the local community. This is considered to be a substantial benefit of the application.
6. The development is situated in a location where tall buildings are considered to be appropriate, subject to demonstration that they would provide an exemplary standard of design and meet the requirements of the London Plan and Southwark Plan in all other regards. The proposed development would be of a quality of design that is exemplary given the constrained nature of the site. Furthermore, the application would deliver a linear strip of public realm between the proposed building and the railway viaduct, in so doing unlocking a section of the Low Line. This new walking route would be framed by a flexible retail/service/dining unit, which would support the vitality and viability of the Major Town Centre.
7. The proposal would provide good quality student housing and would not cause unacceptable harm to the amenity of neighbouring properties.



*Image 01: Visualisation of the development, looking north from Rockingham Street, with a view along the Low Line walking route (right hand side of image)*

8. As the report explains, the proposal would make efficient use of a prominently located and under-utilised site to deliver a high quality and sustainable development that accords with the Council's aspirations for the area. In addition to the economic benefits brought by this proposal, such as the new town centre uses and support for London's higher education institutions, a range of financial contributions will be secured to offset the impacts of the development and assist with local and London-wide infrastructural investment.

## PLANNING SUMMARY TABLES

9.

<b>Housing</b>								
<b>Homes</b>	<b>Private Homes</b>	<b>Private HR</b>	<b>Aff.SR Homes</b>	<b>Aff.SR HR</b>	<b>Aff.Int Homes</b>	<b>Aff.Int HR</b>	<b>Homes Total (% of total )</b>	<b>HR Total</b>
Studio	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
1 bed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2 bed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3 bed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4 bed +	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Total</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>

10.

<b><u>Commercial</u></b>			
<b>Use class and description</b>	<b>Existing GIA*</b>	<b>Proposed GIA</b>	<b>Change +/-</b>
E [a] to (f) (Retail/financial)	N/A	67	+67
E [g] i) (Office)	N/A	N/A	N/A
E [g] ii) and iii) (Light industrial)	N/A	N/A	N/A
B2 (Industrial)	N/A	N/A	N/A
B8 (Storage/Distribution)	N/A	N/A	N/A
E (Affordable workspace)	N/A	N/A	N/A
C1 (Hotel)	N/A	N/A	N/A
Sui Generis	N/A	7844	+7844
<b>Employment</b>	<b>Existing no.*</b>	<b>Proposed no.</b>	<b>Change +/-</b>
Operational jobs (FTE)	0	7 (max)	+7 (max)

\* These figures do not account for the site's most recent lawful uses (and attendant potential job numbers), given that the floorspace no longer exists following demolition of the buildings circa 2017.

11.

<b><u>Parks and child play space</u></b>			
	<b>Existing area</b>	<b>Proposed area</b>	<b>Change +/-</b>
Public Open Space	0	147 sq.m	+147 sq.m
Play Space	0	0	0

12.

<b><u>Carbon Savings and Trees</u></b>			
<b>Criterion</b>	<b>Details</b>		
CO2 savings	11% improvement on Part L of Building Regs 2021		
Trees lost	0 x Category A	0 x Category B	0 x Category C
Trees gained	0		

13.

<b><u>Greening, Drainage and Sustainable Transport Infrastructure</u></b>			
<b>Criterion</b>	<b>Existing</b>	<b>Proposed</b>	<b>Change +/-</b>
Urban Greening Factor	N/A	0.18	N/A
Greenfield Run Off Rate	N/A	5.0l/s*	N/A
Green/Brown Roof Coverage	0	0	0
Electric Vehicle Charging Points	0	1	+1

Cycle parking spaces	0	216	+216
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14.

<b>CIL and Section 106 (or Unilateral Undertaking)</b>	
<b>Criterion</b>	<b>Total Contribution</b>
CIL (estimated)	£1,016,797
MCIL (estimated)	£492,998
Section 106 Contribution	As per the 'Planning Obligations' section of this report

## **BACKGROUND INFORMATION**

### **Site location and description**

15. Located in the Chaucer ward, the application site has an area of 0.0783 hectares and is triangular in shape. It is bounded:
- immediately to the east by the railway viaduct, beyond which are a collection of five-storey 1930s deck-access residential blocks known as the Rockingham Estate, of which 'Stephenson House' and 'Rankine House' are the closest to the application site;
  - immediately to the southwest by Rockingham Street, beyond which is Metro Central Heights, a series of buildings between twelve and sixteen storeys originally constructed as an office block in the 1960s but converted into residential flats in the 1990s; and
  - Immediately to the northwest by Tiverton Street, beyond which is the Salvation Army Headquarters (S.A.H) comprising an eleven storey tower with two-storey rooftop plant and a five-storey ancillary building.
16. The lawful existing use of the open land within the site is Class E. The site was previously occupied by a two-storey building, the last lawful use of which was part retail, part restaurant and part office. All of these uses had ceased by 2015 and the building was demolished in 2017. More information about the planning history is given in a later part of this report entitled 'Existing Lawful Use'.
17. The site has lain vacant since the building's demolition. In the present day, the Tiverton Street perimeter is secured by hoarding and the Rockingham Street perimeter is secured by a mixture of hoarding and walling. There are two points of vehicular access into the site via dropped kerbs – one on Tiverton Street and one on Rockingham Street.

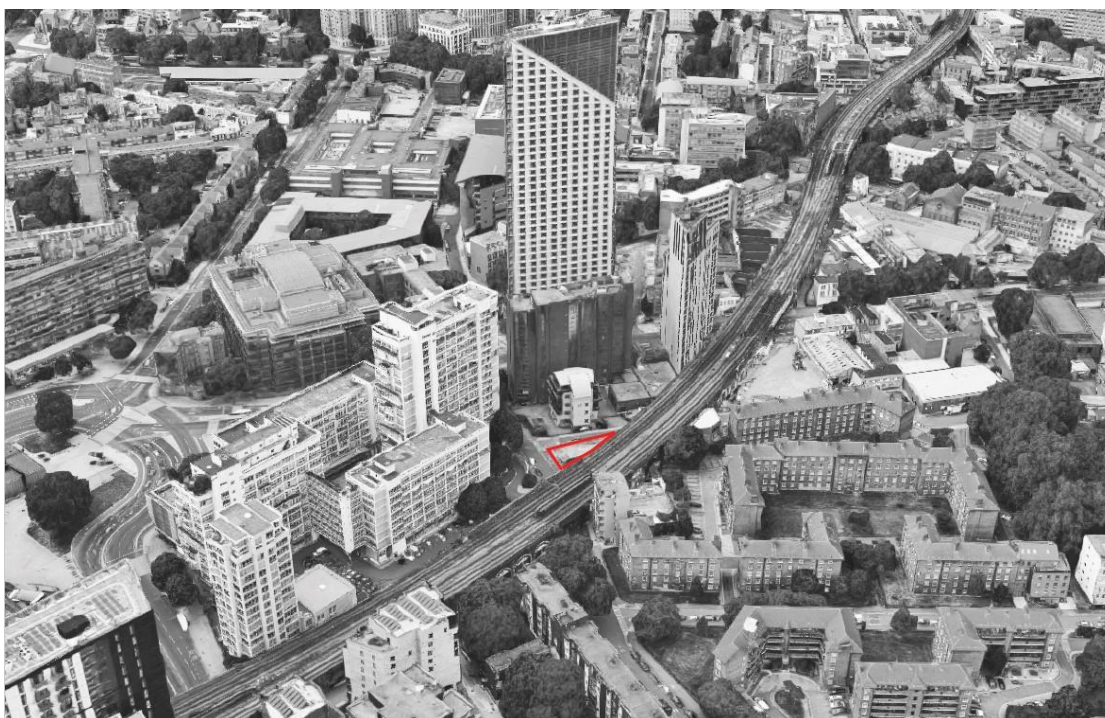


*Image 02 (above): Photograph of the existing site, taken from the junction of Rockingham Street and Tiverton Street, looking northeast towards the railway line.*

18. The application site includes three arches within the railway viaduct that bounds the eastern edge of the land. Under lease to the applicant, these arches are within the ownership of Network Rail.

### Surroundings

19. The area is of a mixed character, comprising offices, residential, commercial, educational, cultural and leisure uses.
20. To the south and west of the site are the various medium and high rise buildings that make up the Elephant and Castle Major Town Centre; predominant uses here are residential, retail, leisure, commercial and education. Although the area is of dense character, it is broken by the wide vehicular routes of Newington Causeway and the Elephant and Castle Peninsula.
21. Spanning northward from the application site, and bisected by the railway line, is the area known as North Elephant. This currently comprises a range of low, medium and high rise buildings, arranged in a relatively tight urban form. Together, these buildings provide a mix of residential, retail, commercial uses and visitor accommodation. North Elephant is also home to leisure and cultural venues, including Southwark Playhouse and Mercato Metropolitano.
22. To the east of the site, beyond the railway line, is a swathe of medium rise housing blocks collectively known as Rockingham Estate. These buildings are arranged around and interspersed by areas of communal green space, giving the area a more spacious feel compared to the Major Town Centre. Newington Gardens and Dickens Gardens are the two main green public spaces.



*Image 03 (above): Aerial image of the site (edged in red), taken looking in a northwestward direction, demonstrating the taller and denser nature of the built form west of the railway line.*

23. The site is located within the Elephant and Castle Opportunity Area, the regeneration of which is guided by Area Vision AV.09 in the Southwark Plan. Critical to realising the vision for the Opportunity Area are two large-scale consented planning applications, both of which will involve significant intensification and densification of areas of land at the heart of Elephant and Castle. They are the 'London College of Communication and Elephant and Castle Shopping Centre' site, construction of which recently commenced, and the 'Elephant Park' masterplan, which is entering its final stages of implementation. Both of these redevelopments have a significant role to play in transforming the character of Elephant and Castle, creating a more integrated, mixed-use, dense, walkable and green neighbourhood.
24. While the commercial centre of Elephant and Castle has been home to a number of medium and high-rise buildings since the 1970s, in recent years it has undergone intensification and densification as part of the delivery of the Opportunity Area vision. As a result, the commercial core has taken on a more urban scale. Tall buildings within the vicinity of the application site are:
- Within a 100 metre radius of the site:
    - The Pioneer Building, 91 Newington Causeway (22 storeys);
    - The Ceramic Building, 87 Newington Causeway (24 storeys);
    - Two Fifty One, 251 Newington Causeway (41 storeys); and
    - Metro Central Heights, 119 Newington Causeway (tallest block 18 storeys).
  - Within a 100-249 metre radius from the site:
    - Elephant Central, 40 New Kent Road (tallest block 26 storeys);

- New Cooper Point, 40 New Kent Road (24 storeys); and
  - London College of Communication (16 storeys).
- Within a 250-1,000 metre radius of the site
    - Srata Tower, 8 Walworth Road (43 storeys);
    - One The Elephant, 1 St Gabriel Walk (37 storeys); and
    - UNCLE Elephant, 9 Churchyard Row (45 storeys).
25. The site is also in close proximity to a hub of higher education facilities and providers, including the London South Bank University and London School of Science and Technology campuses, London College of Communications, and associated student amenities.

### Designations

26. The following policy, socioeconomic and environmental designations apply to the application site:
- the Central Activities Zone (CAZ);
  - Elephant and Castle Area Vision AV.09;
  - Elephant and Castle Opportunity Area;
  - Elephant and Castle Major Town Centre;
  - Elephant and Castle Strategic Cultural Area;
  - Better Bankside Business Improvement District Area;
  - the Low Line (Route 2 - Camberwell to the River Thames);
  - the Article 4 Direction removing permitted development rights for the change of use, within the Central Activities Zone, from offices to residential;
  - Flood Zone 3 (in an area benefitting from flood defences);
  - the Air Quality Management Area;
  - “North-West” Multi-Ward Forum Area; and
  - Community Infrastructure Levy Charging Zone 1.
27. The site is not subject to a site allocation in the Southwark Plan.
28. In respect of heritage designations, the application site contains no listed structures and no part of it is within a conservation area. The nearest conservation area is Elliot’s Row, the closest part of which approximately 250 metres to the west of the application site. Owing to the visual obstruction caused by the various medium- and high-rise buildings around the Elephant and Castle Peninsula, it is not possible to observe the application site from within the Elliot’s Row Conservation Area.
29. The following Grade II listed buildings are within 250 metres of the site:
- Metro Central Heights, Newington Causeway (approx. 25 metres southwest of the site);
  - Michael Faraday Memorial, Elephant and Castle Peninsula (approx. 175 metres southwest of the site); and

- Inner London Sessions Court, Newington Causeway (approx. 225 metres northwest of the site).

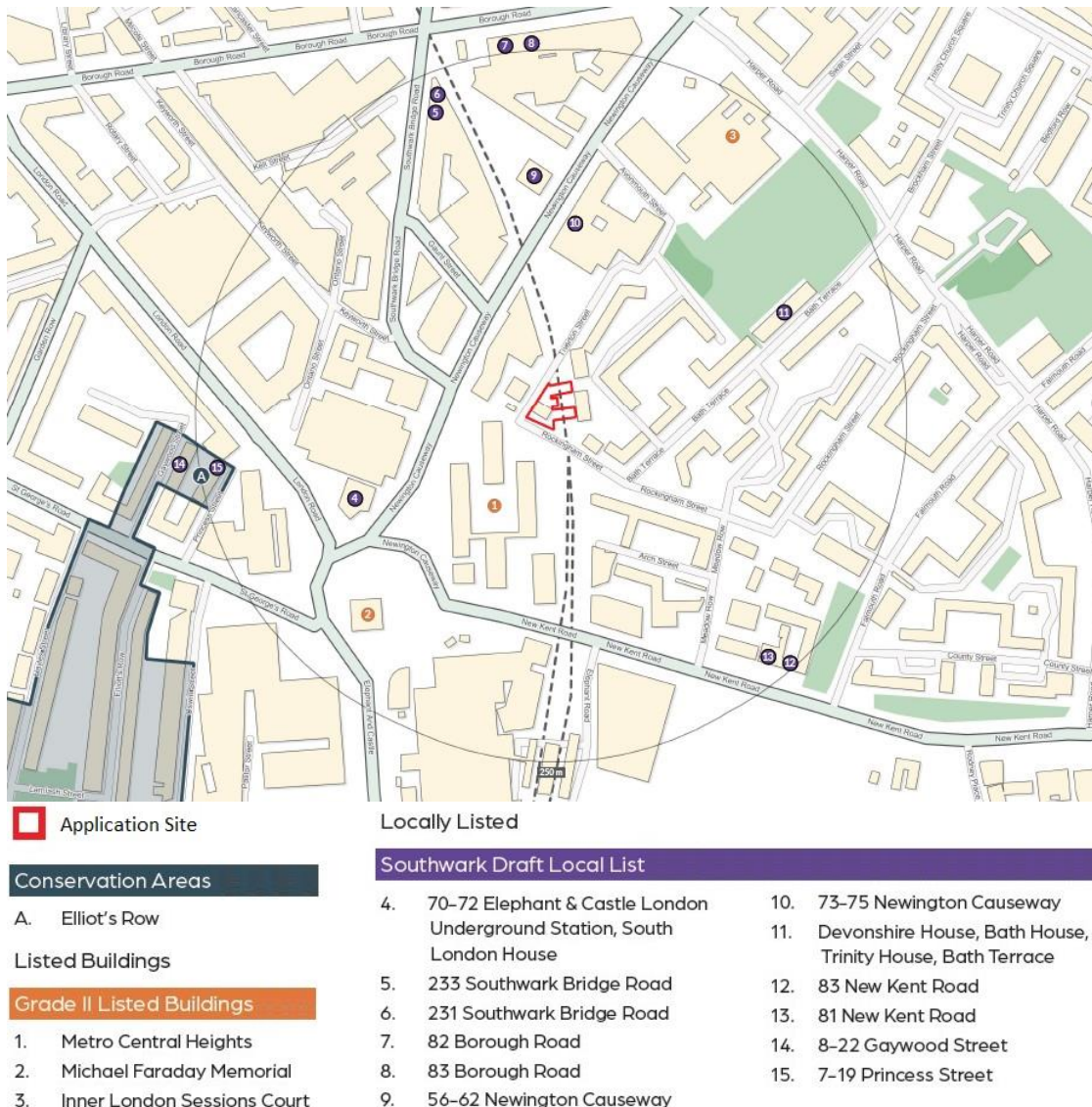


Figure 04 (above): Map showing the site (edged in red) in the context of heritage designations, with the circular line indicating a 250 metre radius.

30. The site is within the 'North Southwark and Roman Roads' Archaeological Priority Area.
31. With respect to strategic and borough views, the site is not within any of the London View Management Framework (including the wider corridors settings and the background regions) or the Borough Views. It is, however, approximately 5 metres north of the background region of Protected View 23.A of the London View Management Framework (Centre of Bridge over the Serpentine to the Palace of Westminster). With respect to Borough Views, the closest, BV.03 (Camberwell Road Linear View towards St Paul's Cathedral), is more than 50 metres to the east of the site.



32. There is no existing public space, nor any trees or other meaningful vegetation, within the application site. The nearest public green space is Newington Gardens, approximately 150 metres (2 minute walk) to the northeast. Farther beyond but within 500 metres of the site are four other public green spaces: Dickens Fields, Elephant Park, St Mary's Churchyard and West Square.
33. With respect to transport designations, the application site is:
- within PTAL Zone 6b, representing the highest possible public transport accessibility level; and
  - within the Newington Controlled Parking Zone (operational from 08:00hrs to 18:30hrs on Monday to Friday).
34. With respect to parking and servicing infrastructure locally, there are:
- 1 permit-holder parking space on Rockingham Street;
  - 6 paid-for and permit-holder parking spaces on Rockingham Street, 1 of which is directly to the front of the application site, with the other 5 southeast of the railway line;
  - 5 paid-for and permit-holder parking spaces on Tiverton Street, all north of the railway line;
  - 1 disabled space on Meadow Road, approximately 150 metres southeast of the site;
  - 1 disabled space on Southwark Bridge Road; and
  - 1 car club space on Keyworth Street.
35. The nearest transport hub is Elephant and Castle tube and mainline railway station, approximately 200 metres to the southwest. The next nearest underground station is Borough, approximately 600 metres to the northeast. Regular bus services operate along Newington Causeway and from the Elephant and Castle peninsula. The pedestrian routes around the application site provide easy access to the bus stops and train stations.
36. London Cycle Network Route 23, which connects Elephant and Castle to Coulsdon in Croydon, runs along Tiverton Street. Cycle Superhighway 7 runs along Keyworth Street, which is approximately 200 metres northeast of the site.
37. There are in excess of 200 public cycle spaces within a 250 metres radius of the site. These can be found in clusters of 'Sheffield' or 'Camden' stands around the Elephant and Castle Peninsula (176 spaces), on Keyworth Street (20 spaces) and on the northern section of Newington Causeway (8 spaces). Also within 250 metres is a Santander docking station on Ontario Street (13 docks); two additional Santander stations can be found slightly farther away at Strata Tower (40 docks) and on Harper Road (42 docks).
38. All roads adjacent to the site are adopted highways.

## Details of proposal

39. This application seeks full planning permission for the redevelopment of the site to provide a 24-storey building of a triangular footprint, with one further storey of accommodation at basement level. Accounting for rooftop plant and overrun, the building would stand 70.67 metres above ground level (73.14 metres AOD) at its maximum point. The building's east elevation would run parallel with the railway viaduct but be set away from it by 2.5 metres at ground level; the resulting linear strip of land is to become a publicly-accessible pedestrian route forming part of the Low Line.



*Image 05 (above): Handmade model of the proposed tower in context, as seen looking in a northwards direction.*



*Image 06 (above): Visualisation of the proposed tower, as seen from Tiverton Street, showing its relationship to the railway line.*

40. The proposed building would deliver 244 student accommodation units (Class Sui Generis). These would take the form of:
- 206 self-contained studios, 13 of which would be wheelchair accessible; and
  - 38 shared studios (i.e. a flat containing two en-suite bedrooms with the two occupiers sharing the living/kitchen/dining space).
41. The building would provide ancillary facilities for the student occupiers including a number of communal amenity rooms, a reception foyer with recreation/lounge space at mezzanine level, and a laundry room. The total communal amenity area provided is 327 square metres which equates to an average of 1.34 square metres per student. The building would also incorporate a self-contained single-

storey ground floor retail/service/dining unit (flexible Class E use) on its northern corner.

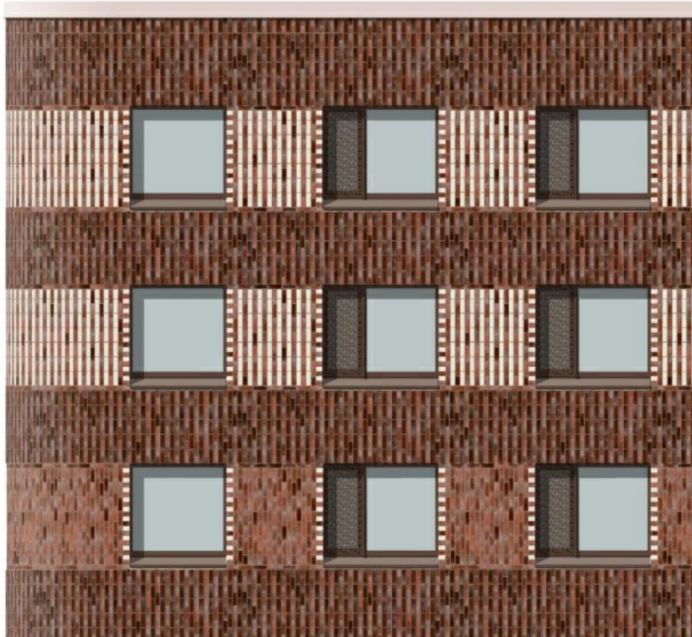


*Image 07: Ground floor floorplan of the tower.*

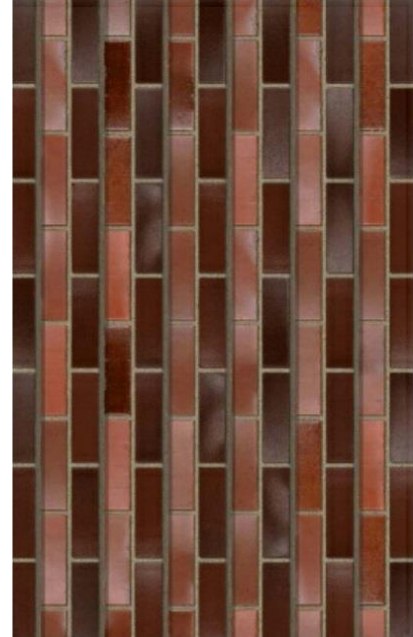


*Image 08: First floor floorplan of the tower.*

42. All 244 units would be let at market rate. A nominations agreement –whereby all or some of the rooms would be operated directly by a higher education provider– has not been agreed. Instead, it is expected that the scheme would be managed by Homes for Students, the largest independent student accommodation provider in the UK.
43. With regard to the form and appearance of the building, the first, second and third floor levels would be of a larger footprint than the ground and mezzanine levels, cantilevering beyond the two base storeys on the southwest and northwest frontages. The footprint of the 19 uppermost storeys would be larger still, cantilevering beyond the base five storeys on the southern corner and along the east (Low Line) frontage. Glazed frontages would be provided at ground and mezzanine levels; where piers are needed, these would be faced in glazed brick of deep red and brown hues with the double-height reveals finished in white semi-gloss brick. The upper 22 storeys would be clad predominantly in vertically-bonded red brickwork, complemented by white brickwork applied to the window jambs. Windows and doors would be framed in bronze-effect metal. A slimline stone-effect coping would provide a simple crown to the building.



*Image 09: Cropped elevation, showing the top three storeys of the tower, including the simple stone-effect coping to the crown.*



*Image 10: A sample of the deep red bricks to be used on the banded elements.*

44. The application proposes to bring all three of the adjacent railway arches back into use. New metal framed frontages –one entirely glazed, with the other two containing glazing and latticework– would be installed, along with a new mezzanine level internally. The southern arch would be given over to bicycle storage, while the northern arch would be repurposed for plant and waste/recycling storage. The remaining central arch would become a flexible retail/service/dining unit. Owing to this arch being located opposite the retail unit on the northern corner of the proposed building, the applicant’s vision is for the repurposed arch to function as an extension of the commercial unit, with dining furniture from the two ‘spilling out’ onto the Low Line, creating a direct relationship across the passageway. Together, the two component parts would contain approximately 67 square metres GIA of floorspace.



*Figure 11: Proposed elevation of the three railway arches, showing the metal framed frontages to be installed, the central one of which would be brought into active reuse as part of a flexible retail/service/dining unit.*

45. Approximately 23% of the site is to be given over to open space. The main component of the public realm offer is the proposed Low Line route, which would measure 3.2 metres in width and approximately 25 metres in length. A 1.5 metre wide clear 'passageway' through the Low Line route –where tables and chairs would be prohibited– is proposed, to be delineated through the use of differentiated paving treatments. Planting boxes would be distributed along the western edge of the Low Line, against the ground floor piers. Affixed to these boxes would be trellises allowing the planting to grow up the building facade. Ornamental planting in moveable boxes would be arranged along the eastern edge of the Low Line.
46. A small further area of hard-surfaced public realm would be provided on the building's southwestern side, enlarging the existing footway. Within this area of public realm a small number of planting boxes are proposed, again fitted with trellises to allow climbing plants to grow up the building piers.
47. Short-stay cycle stands would be located on the small strip of public realm to the southwest of the building. The majority of long-stay cycle storage would be provided in the southern arch, with a small number of Brompton-style cycle lockers accommodated in the entrance reception/foyer. All servicing, including all refuse collections, would take place from a new on-street loading bay located on the southeastern side of Tiverton Street. The bay would provide space for vehicles of up to 12 metres in length. The proposal would be a car free development.

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

48. Appendix 3 sets out in detail the full planning history for the site as well as details of relevant applications on adjoining or nearby sites. Details of two key historic planning permissions are given below.
49. This site has two extant consents. The first (ref: 13/AP/3450) is for the demolition of the existing buildings and construction of a 13 storey building to provide 30 residential units and a restaurant on the ground floor. It also included redevelopment of two of the adjacent railway arches. That permission was granted with a legal agreement in October 2014. An application was made for a certificate of lawfulness to confirm that the permission had been implemented (ref: 18/AP/2902). However the application was withdrawn when the previous owners sold the site.
50. The second extant consent (ref. 19/AP/0750), granted with legal agreement in January 2020, is for the demolition of the existing buildings and construction of an exclusively commercial 21-storey building with basement. It also included the redevelopment of the three adjacent railway arches for flexible commercial space. The permission was technically implemented in January 2023. The principal ways in which the 19/AP/0750 scheme differed from the 13/AP/3450 scheme are:
  - the 'red line boundary' of the 2019 development site was larger, due to incorporating an additional railway arch and land adjacent to the viaduct;

- the height of the 2019 building was 27.515 metres taller, standing to a height of 70.665m AOD; and
- the 2019 scheme was a fully commercial scheme rather than a residential-led development.



*Figure 12: Visualisation of the 2014 residential-led consented building.*



*Figure 13: Visualisation of the office-led building consented in 2020.*

51. The 22/AP/1068 application has the same 'red line boundary' as the newly-proposed scheme and the proposal would stand to the same height (70.67 metres above ground). However, there are some key differences, as follows:
- the 22/AP/1068 scheme would be student housing led, whereas the 19/AP/0750 scheme was almost entirely office;
  - the 22/AP/1068 scheme would deliver a lesser quantum of flexible town centre / retail floorspace (67 square metres) compared to the 19/AP/0750 scheme (340.1 square metres);
  - the basement in the 22/AP/1068 scheme would comprise two storeys, whereas the basement in the 19/AP/0750 scheme was single storeyed;
  - the building proposed by 22/AP/1068 would take a more accentuated cantilevered form than the 19/AP/0750 scheme, with a different footprint across the vertical profile of the building;
  - the building proposed by 22/AP/1068 would have rounded corners, as opposed to the more rectilinear form of the 19/AP/0750 scheme.

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

52. Planning application 22/AP/1068 was submitted following a detailed pre-application enquiry, the reference numbers for which is 21/EQ/0124. During the course of the pre-application engagement, the applicant made various amendments to the scheme design. At the end of this iterative process, the Council issued a formal response letter. Although the letter was confidential at the time of issue, in accordance with the Council's commitment to ensuring all

information relevant in the determination of a planning application is made publicly available, the response letter has been published on the Public Access for Planning Register alongside the 22/AP/1068 application documents. The letter should be referred to if any further information is required about the pre-application process.

53. With respect to building design, changes included:

- omitting three large columns (supporting the cantilevering storeys above) that would have punctuated the public realm;
- switching to a warmer, red coloured brick finish;
- introducing a white contrasting semi-gloss glazed brick in the windows reveals, in a course at crown and on the lower levels;
- introducing more greening within the Low Line and on the lower storeys of the building's southeast and southwest façades

54. With respect to layout and quality of accommodation, changes included:

- consolidating the student amenity facilities by moving some of the facilities out of one of the central railway arches and into the main body of the building;
- improving the floor-to-ceiling heights within the student accommodation units;
- improving the proportion of wheelchair student accommodation units fully fitted out for immediate occupation [i.e.M4(3)(2)(b)].

55. With respect to energy and sustainability, changes included:

- increasing the greening coverage to improve the UGF score;
- incorporating openable ventilation panels for the student rooms, to afford tenants a degree of human control over their interior environment.

56. The images below give a sense of the evolution of the design over the course of the pre-application process:



*Image 14 (above): the ground layout as submitted at the first stage of pre-application engagement, where three columns were proposed within the public realm and a student amenity room within the central railway arch.*



*Image 16 (above): Early iteration of the scheme, where levels 01, 02 and 03 oversailed more of the Low Line, requiring a column to punctuate the public realm*

*Image 15 (above): the ground layout as submitted at planning application stage, showing the columns within the public realm omitted, as well as an enlarged flexible retail/service/dining unit flanking the Low Line.*



*Image 17 (above): Visualisation of the planning application stage scheme, showing levels 01, 02 and 03 smaller in footprint, with the column punctuating the public realm omitted.*



*Image 18 (above): Early iteration of the scheme as seen from Tiverton Street, where columns supporting the upper floors punctuated the public realm.*



*Image 19 (above): View from Tiverton Street as submitted at planning application stage, showing a curved facade and unobstructed public realm.*

57. Over the course of the planning application process, the applicant made further refinements to the proposal in response to concerns raised through the consultation process and/or issues highlighted by officers. These changes include:

- amendments to the layout of the proposed building, including a reduction in the number of student rooms from 259 to 244 and the addition of a second circulation core for fire safety reasons;



- amendments to the elevations/fenestration of the proposed building;
- the provision of additional greening;
- a Planning Statement Addendum, summarising the proposed changes and replying to concerns raised by public objections;
- updated planning application documentation relating to matters of energy and sustainability, fire, daylight and sunlight etc., including responses to statutory consultees; and
- updated planning drawings to reflect the changes.

58. The images below give a sense of the evolution of the design over the course of the planning application phase:



*Image 20 (above): Ground floor plan at the outset of the planning application, showing one staircore within the tower.*

*Image 21 (above): Ground floor plan at determination stage, showing two staircores within the tower to address fire safety requirements.*

59. The applicant also provided a series of supplementary and revised reports to provide clarifications and corrections with regard to various issues raised by members of the public.

## KEY ISSUES FOR CONSIDERATION

### Summary of main issues

60. The main issues to be considered in respect of this application are:

- Consultation responses from members of the public and local groups;
- Principle of the proposed development in terms of land use;
- Development viability;
- Environmental impact assessment;
- Quality of accommodation;
- Amenity impacts on nearby residential occupiers and surrounding area;

- Design;
- Public realm, landscaping and trees;
- Green infrastructure, ecology and biodiversity;
- Transport and highways
- Environmental matters;
- Energy and sustainability;
- Digital connectivity infrastructure;
- Planning obligations and Community Infrastructure Levies;
- Community engagement and consultation responses and
- Community impacts, equalities and human rights.

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

### **Legal Context**

62. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021, the Southwark Plan 2022 and the Elephant and Castle SPD and OAPF. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications 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.
63. There are also specific statutory duties in respect of the Public Sector Equalities Duty, which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

### **Adopted planning policy**

64. The statutory development plan for the borough comprises the London Plan 2021 and the Southwark Plan 2022. The National Planning Policy Framework 2021 is a material consideration but not part of the statutory development plan. A list of policies 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.

## **ASSESSMENT**

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

65. Consultation with members of the public was first conducted in August 2021. Letters were sent to local residents when the application was received, the application was advertised in the local press and site notices were displayed. Comments were received from 20 respondents. The table below summarises the number of representations received during this period:

<b><u>Original round of consultation: Summary table</u></b>		
Total number of respondents: <b>20</b>	Total number of responses: <b>24</b>	
The split of views between the 20 respondents was:		
In objection: <b>19</b>	Neutral: <b>0</b>	In support: <b>1</b>

66. The reason that 24 representations were received from 20 respondents is that two of the respondents submitted multiple responses.
67. As mentioned in an earlier part of this report, a number of amendments were made to the application over the course of the determination process. To ensure the public was made aware of the changes, re-consultation was conducted in mid July 2022. The table below summarises the number of representations received in response to the re-consultation:

<b><u>Re-consultation: Summary table</u></b>		
Total number of respondents: <b>2</b>	Total number of responses: <b>2</b>	
The split of views between the 2 respondents was:		
In objection: <b>2</b>	Neutral: <b>0</b>	In support: <b>0</b>

68. In total across the consultation and re-consultation period, 20 individuals made representations to the Council about the planning application. Of these 20 individuals, there were 2 who commented as part of the original consultation and then commented again as part of the re-consultation. Those 2 individuals both objected as part of the original consultation, and maintained their objection when commenting as part of the re-consultation.

### **Reasons in objection**

69. The following paragraphs summarise the material planning considerations raised in objection by the consultation and re-consultation. The issues raised by these objections are dealt with in the main assessment part of this report. Some objections raised by the public consultation process do not constitute material planning considerations (such as loss of view); therefore, these are not captured in the following summary paragraphs, nor are they discussed in later parts of this report.

### **Amenity Impacts**

70. • Will result in loss of daylight/sunlight;

- Daylight/sunlight testing of surrounding properties is inaccurate, having been based on assumed layouts (from estate agents' particulars etc.) rather than on first hand research (e.g. in person inspections of the flats);
- The daylight and sunlight testing obscures that the greatest impacts will be experienced by flats on the lower floors of Metro Central Heights on the Rockingham Estate (the point presumably being made by the objector here is that, in testing a very large total number windows, the daylight and sunlight assessment has the effect of producing a low percentage rate of adversely affected windows)
- The forthcoming redevelopment of 101 Newington Causeway, and the two site's cumulative amenity impacts, has not been accounted for;
- Will reduce privacy and increase overlooking;
- Compared with the previous/implemented office use on this site, the residential use now proposed will be more invasive/intensive in terms of overlooking;
- Will result in increased noise locally once the development is operational;
- Application documents are unclear as to how noise will be managed, especially out of hours when there is no on-site property manager;
- Will result in increased anti-social behaviour.

#### Land uses

- 71.
- There are more appropriate uses for the site, such as office and/or housing;
  - There is no need/demand for student housing in this location;
  - Student accommodation is an unsuitable use in a predominantly residential location;
  - Will provide no permanent/conventional new homes, contrary to the Southwark Plan and the Elephant and Castle Area Vision.

#### Design and heritage

- 72.
- Development is too tall;
  - Development is of poor architectural/design quality;
  - Development will cause harm to the setting of Metro Central Heights, a listed building;
  - There are already enough high rise buildings in Elephant and Castle;
  - Public realm offer is of a poor quality.

#### Quality and management of student accommodation

- 73.
- The student rooms facing the railway will have unacceptably poor living conditions;
  - The Student Management Plan is inadequate;
  - Facilities provided within the development will be inadequate for the number of student occupiers (e.g. number of washer/driers).

#### Transport and highways

- 74.
- Transport Assessment has not accounted for instances of 'move-in, move-out' occurring outside of the two September weekends each academic year;
  - The management plan does not deal with the move-out process;
  - Danger to trains (from items falling out of windows at the proposed development);
  - There has been no assessment of potential car use by student residents;
  - Will bring additional traffic post-construction.

#### Construction Phase

- 75.
- Increase noise and traffic during construction and the end-use;
  - The construction works will increase dust and worsen air quality.

#### Economic impacts

- 76.
- Will offer only a few low-skilled, low-wage jobs;
  - Student accommodation does not provide many economic benefits;
  - Students do not contribute by way of Council tax, so there is very little contribution to the local community from the proposed land use;
  - The claims made by the applicant in their submission entitled "*Why student Accommodation?*", which set out the economic benefits of this land use, are misleading

#### Social infrastructure and community impact

- 77.
- When taken together with the 200+ students the Avonmouth Street student housing scheme will introduce, the development will result in nearly 500 students all living in close proximity in this particular part of the Elephant and Castle;
  - The transient nature of the student population, which the proposed development will add to, has a negative impact on resident wellbeing and community dynamics;
  - Lack of community spirit to the scheme.

#### Health impacts

- 78.
- The height and scale of the buildings would be injurious to the mental health and well-being of existing surrounding residents;
  - Will be detrimental to the overall health of existing residents.

#### Infrastructural impact

- 79.
- Will place increased burden on already over stretched public services and utilities.

#### Climate considerations

80. • As a result of the proposed development, residents will have to use artificial lighting for longer periods of the day, creating climate and personal finance implications.

#### Developer approach

81. • The developer has pursued a stealth pathway of submitting a sequence of applications, changing the use and/or height each time, to reach a point where a high rise building is now proposed for a different use to the one originally sought.

#### Impact on development potential of other sites

82. • The development may curtail the redevelopment potential of the S.A.H site at 101 Newington Causeway.

#### Reasons in support

83. Listed below are the material planning considerations raised in support of the planning application by the consultation and re-consultation:
- Student accommodation is necessary to support universities, medical and tech buildings, producing a "campus" atmosphere and bringing neighbourhood regeneration and broader urban revitalisation.

### **Environmental impact assessment**

84. Environmental Impact Assessment is a process reserved for the types of development that by virtue of their scale or nature have the potential to generate significant environmental effects.
85. The Council was not requested to issue a screening opinion as to whether the proposed development, due to its proposed size and scale, would necessitate an Environmental Impact Assessment (EIA).
86. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 set out the circumstances in which development must be underpinned by an EIA. Schedule 1 of the Regulations sets out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development types for which an EIA might be required due to the potential for significant environmental impacts to arise. Schedule 3 sets out that the significance of any impact should include consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.
87. The range of developments covered by Schedule 2 includes 'Urban development projects' where:

- the area of the development exceeds 1 hectare and the proposal is not dwellinghouse development; or
  - the site area exceeds 5 hectares.
88. The application site is 0.0783 hectares and as such the proposal does not exceed the Schedule 2 threshold.
89. Consideration, however, should still be given to the scale, location or nature of development, cumulative impacts and whether these or anything else are likely to give rise to environmental impacts of more than local significance. Planning application 22/AP/1068 proposes a student-housing led scheme rising to a height no greater than that established by the previous/implemented planning consent on this site, together with public realm improvements and other associated works. Its scale is appropriate to its urban setting and it is unlikely to give rise to any significant environmental impacts. Its scale is appropriate to its urban setting and it is unlikely to give rise to any significant environmental impacts. Those impacts which are identified through the various submitted reports and studies can be mitigated through appropriate conditions or obligations.
90. For the above reasons, an EIA is not required in respect of the proposed development.

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

### Existing lawful use

#### Lawful use as of 9<sup>th</sup> January 2023, and associated change of use considerations

91. On 9th January 2023, the applicant for 19/AP/0750 technically implemented their permission by demolishing a stretch of boundary wall along the site's Rockingham Street boundary. Within the Town and Country Planning Act 1990, Section 56(4) defines what constitutes a “material operation”, in line with which a development shall be deemed to have been initiated. Sub-section (aa) confirms that ‘any work of demolition of a building’ comprises a material operation for this purpose. In demolishing the boundary wall and thereby technically implementing, the applicant for 19/AP/0750 established the lawful use of the application site for office and flexible commercial purposes. These uses span Class E[a], Class E[g] and Class F1 of the Use Classes Order 2020. Lawful implementation was confirmed in writing by the Council in Spring 2023 as part of a Certificate of Lawfulness application.
92. Planning application 22/AP/1068 now proposes to change the use of the site to a mix of uses not including office.
93. Although the site could be redeveloped for an office use, given the equal weight attributed to office and residential development within the Elephant and Castle Opportunity Area, the change of use away from Class E[g][i] does not raise any strategic concerns in relation to Policy SD5(G) in this instance.

94. Southwark Plan Policy P30, which deals with office uses, requires development proposals to “Retain or increase the amount of employment floorspace on site (Gross Internal Area (GIA) of E[g])”. It goes on to say “Development that results in a loss of employment floorspace anywhere in the borough must provide a financial contribution towards training and jobs for local people.” In setting out these requirements, Policy P30 is implicitly referring to *existing* employment floorspace. Implemented but not substantially complete employment floorspace would not count. As such, the 22/AP/1068 proposal should not be treated as resulting in a loss of existing office use. Accordingly, the uses proposed by this planning application would neither conflict with Policy P30 nor warrant a compensatory financial contribution towards training and jobs for local people.

Lawful use immediately before 9th January 2023, and associated change of use considerations

95. The following paragraphs detail the historic uses of the site and establish what its lawful use was immediately prior to 9<sup>th</sup> January 2023. As the paragraphs set out, the implementation of 19/AP/0750 has not in any way enabled the new student housing proposal to avoid being tested against any policies that would otherwise have applied and which may have raised land use issues/conflicts.

*Triangular area of open land*

96. The triangular area of land forming the primary part of the site is currently vacant, having most recently been occupied by a commercial building. Between 1994 and 2004, the building was occupied by ‘P & S Food and Wine,’ an off licence and convenience store. This established the building’s lawful use as retail (formerly Class A1, now Class E[a]). In 2004, consent was granted under planning application 04/AP/1840 to insert a mezzanine floor and change the building into two self-contained parts, as follows:
- The large unit - a mixed restaurant (former Class A3, now Class E[b]) and office (former Class B1, now Class E[g]) use, arranged over the ground and mezzanine floors, totalling 244 square metres GIA; and
  - The small unit - an off licence (former Class A1, now Class E[a]), arranged over the ground and mezzanine floors, totalling approximately 38 square metres GIA.
97. This arrangement of a ‘large unit’ and ‘small unit’ is depicted below. The image also shows how the cellular office spaces within the larger unit (highlighted red) represented a very small proportion of the unit’s total GIA:





Image 22 (above): Historic plan of the ground floor of the building, with the small unit edged in blue, the restaurant in green and the offices in red.

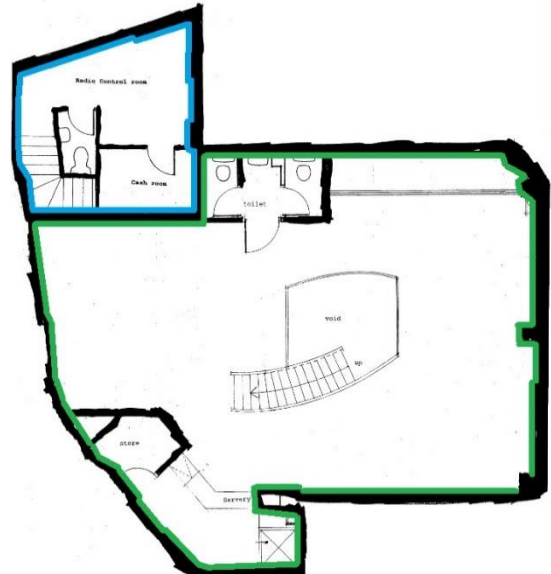


Image 23 (above): Historic plan of the upper floor of the building, with the small unit edged in blue and the restaurant in green.

98. Over an eleven year period between 2004 and 2015, the large unit operated as a restaurant, first under the name 'Sorriso' and later under 'Lenos and Carbon'. Although historic photographic evidence suggests that throughout both of those tenancies the large unit was laid out without the consented cellular office space (and as such the entire unit operated as a dining use), it is not possible to definitively conclude that the unit lawfully became an exclusively restaurant use with the passage of time.
99. The upper floor of the small unit was granted a change of use in 2005, under planning application 05/AP/1121, to a mini cab control office (Sui Generis) for a limited period. Although the exact date on which the off licence and mini cab control office stopped trading is not known, it was no later than 2009. Thereafter, the small unit lay vacant.
100. The building was demolished in 2017, since which time the land has been hoarded and not used for any new purpose.
101. In light of all of the above, the lawful existing use of the land immediately before 9<sup>th</sup> January 2023 was Class E (Commercial, Business and Service), distributed between the sub-categories in the following approximate proportions:
- Class E[g][a] (Retail) - 78% of the triangle of land;
  - Class E[g][b] (Dining) - 9% of the triangle of land; and
  - Class E[g][i] (Office) - 13% of the triangle of land.
102. Planning permission 19/AP/0750 is for a scheme containing retail and office. As such, of the three uses listed above, only the dining use has been extinguished by the implementation of 19/AP/0750. The statutory development plan, and the policies contained therein, treats dining uses as 'retail'. Therefore, the

implementation of 19/AP/0750 has not, in extinguishing the dining use, enabled any land use policy considerations to be obviated in the consideration of 22/AP/1068.

103. Furthermore, and as explained in detail in a later part of this report, the 22/AP/1068 proposal incorporates a 67 square metre flexible commercial unit, one potential use of which is as a restaurant/café; were the unit to be used as a restaurant/café, this would have the effect of reinstating one of the site's former lawful uses (Class E[b]). Therefore, no local or strategic land use issues are raised in this respect.

### Railway arches

104. As mentioned in an earlier part of this report, the site includes the three adjacent railway arches within the ownership of Network Rail, which together have a floor area of approximately 225 square metres. Until 2014 the arches were occupied by Atlas Fire Engineering Limited trading as Tyco Fire and Integrated Solutions. It is believed that the company used the premises for storage, distribution and fleet parking purposes. However, due to the absence of any planning history as well as the lack of detail about Tyco Fire's duration of occupancy to confirm the lawful use, and also accounting for the period of vacancy having been nearly ten years, it can be concluded that the arches were in 'nil' use immediately before the implementation of 19/AP/0750 in January 2023.
105. Where a planning application proposes to change land or a building from an existing 'nil' use, the only planning test in land use terms is whether the new use is considered acceptable against all relevant policies. As such, in implementing 19/AP/0750 and thereby changing the arches from a nil use to a flexible commercial use, the applicant has not enabled the 22/AP/1068 proposal to circumvent any land use policy considerations that would have otherwise applied. Therefore, no local or strategic land use issues are raised in this respect.

### Conclusion

106. In summary, and having considered not just the recently-established lawful use of the land but also the lawful uses prior to this, there is no objection in principle to the site being repurposed for a mix of uses not including office.

### Relevant policy designations

#### Overarching strategic policy objectives

107. The National Planning Policy Framework (NPPF) was updated in 2021. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development. Relevant paragraphs of the NPPF are considered in detail throughout this report. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

108. The Good Growth chapter of the London Plan includes GG2 “Making the Best Use of Land” and GG5 “Growing a Good Economy”, which are relevant to the proposal. To create sustainable mixed-use places that make the best use of land, objective GG2 states that those involved in planning and development must enable the development of brownfield land, particularly in Opportunity Areas and town centres, and prioritise sites that are well connected by public transport. It also encourages exploration of land use intensification to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. Objective GG5 states that to conserve and enhance London’s global economic competitiveness --and ensure that economic success is shared amongst all Londoners-- those involved in planning and development must, among other things:

- promote the strength and potential of the wider city region;
- ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning;
- provide sufficient high-quality and affordable housing, as well as physical and social infrastructure;
- help London’s economy to diversify; and
- plan for sufficient employment space in the right locations to support economic development and regeneration.

#### Central Activities Zone (CAZ)

109. The site is within the CAZ, which covers a number of central London boroughs and is London’s geographic, economic, and administrative core. London Plan Policies SD4 and SD5 outline the strategic functions of the Central Activities Zone (CAZ), of which higher education is one, stating that its unique mix of uses should be promoted and enhanced. Policy SD6 of the London Plan recognises that the vitality and viability of London’s varied town centres should be promoted and enhanced.

110. With regard to retail uses, the London Plan designates Elephant and Castle as one of the CAZ retail clusters, where retail expansion and diversification is to be supported in the interests of delivering “approximately 375,000 square metres of additional comparison goods retail floorspace over the period 2016-2041” across the CAZ.

#### Elephant and Castle Opportunity Area

111. The site is within the Elephant and Castle Opportunity Area, one of twelve in central London. The London Plan sets out an indicative capacity of 5,000 homes and 10,000 jobs for this Opportunity Area over the twenty years to 2041. London Plan Policy SD1 “Opportunity Areas” requires boroughs through their development plans and decisions to:

- support development which creates employment opportunities and housing choice for Londoners;
- plan for and provide the necessary social and other infrastructure to sustain growth; and
- create mixed and inclusive communities.

112. The London Plan specifically recognises the value of the proposed Bakerloo Line extension from Elephant and Castle to Lewisham and beyond, which would increase the connectivity and resilience of the area while also reducing journey times to key destinations.

#### Elephant and Castle Major Town Centre

113. The site is also within the Elephant and Castle Major Town Centre, where London Plan Policy SD6 “Town Centres and High Streets” encourages development to, amongst other things:

- promote the vitality and viability of town centres, including by bringing forward mixed-use or housing-led intensification;
- optimise residential growth potential;
- accommodate a diverse range of housing, including student housing; and
- enhance the vitality of the area through the provision of vibrant and well-managed daytime, evening and night-time activities.

114. The key policy at the local level is Southwark Plan Policy P35 “Town and Local Centres”. This sets out that, amongst other things, development must:

- ensure main town centre uses are located in town centres and local centres;
- be of a scale and nature that is appropriate to the role and catchment of the centre;
- retain retail floorspace or replace retail floorspace with an alternative use that provides a service to the general public, and would not harm the vitality and viability of the centre;
- not harm the amenity of surrounding occupiers or result in a concentration of uses that harms the vitality, viability and economic growth of the centre; and
- provide an active use at ground floor in locations with high footfall.

#### Elephant and Castle Area Vision

115. The site is located within AV.09, the Elephant and Castle Area Vision. In this location, development is expected to:

- support the area’s function as a location that attracts global business, research, teaching, shopping, flexible business spaces and cultural activities;
- provide as many homes as possible, including social housing;

- support the creation of a distinctive environment through a mix of innovative and enduring new architecture, heritage buildings, open spaces and quality public realm;
- contribute towards the development of the Low Line, with lively accessible spaces for creativity, new jobs and retail; and
- harness the expertise and infrastructure from the universities to develop a strong, dynamic and specialised local economy that will attract new specialised services and research.

116. One of the footnotes to AV.09 states that Elephant and Castle has the potential to provide significant amounts of new shops and university facilities, amongst other uses.

#### Conclusion on policy designations

117. The principle of redeveloping the application site for a student housing-led development with a flexible Class E (retail/service/dining) component is acceptable, as it would support the role and functioning of the Elephant and Castle Major Town Centre as well as being consistent with the policies for the Opportunity Area. The acceptability of each use is considered below.

#### Higher education and associated uses

##### Policy background

118. The London Plan sets out the strategic vision for the higher education sector. Policy S3 “Education and Childcare Facilities” acknowledges that universities play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy, and for the capital to remain globally competitive. Under Part B of the policy is a set of criteria that development proposals for education facilities should meet, including:

- being located in areas of identified need;
- being in locations with good public transport accessibility; and
- fostering an inclusive design approach.

119. Paragraph 5.3.8 of the supporting text to Policy S3 states:

*“Higher education in London provides an unparalleled choice of undergraduate and postgraduate degrees, continuing professional development, advanced research, and infrastructure to support business growth, such as incubation space and business support services. It is also a significant employer and attracts major international companies able to benefit from universities’ research reputations, such as in pharmaceuticals and life sciences. Universities also play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy, and for the capital to remain globally competitive. The Mayor has established a forum for higher education institutions and further education establishments to work with boroughs and other stakeholders to plan future developments, including student accommodation, in locations which are well-connected to public transport”*

120. London Plan Policy E8 “Sector Growth Opportunities and Clusters” states that London’s higher and further education providers, and their development across all parts of the city, are to be promoted. Their integration into regeneration and development opportunities to support social mobility and the growth of emerging sectors should be encouraged. The supporting text endorses measures to secure and develop London’s leading role as a centre of higher and further education of national and international importance.
121. Southwark Plan Policy P27 “Education places” says that development for higher and further education facilities will be permitted where they meet identified needs.

### Assessment

122. Within walking distance of two universities and benefiting from very strong transport accessibility, the site’s Major Town Centre location makes it appropriate for education-related uses. The proposed student housing use would meet an identified within Southwark for higher education related facilities, while also supporting the CAZ as a centre of excellence for education. Therefore, in principle the proposal aligns with the requirements of London Plan Policies S3 and E8, as well as Southwark Plan Policy P27.

### Student accommodation

#### Policy background

123. Student housing is classified as non self-contained accommodation and a ‘sui generis’ use in the Use Classes Order. Student accommodation is also considered as ‘housing’ for monitoring purposes through the Council’s and GLA’s monitoring reports.
124. The London Plan sets the borough a target of providing 23,550 net new home completions over the next ten years. In order to help meet this target, while also supporting the vibrancy and vitality of the CAZ, London Plan policies SD4 and SD5 promote mixed use development, including housing, as well as locally-oriented retail, cultural, arts, entertainment, night-time economy and tourism functions. Policy SD5 makes clear that new residential development should not compromise the CAZ strategic functions.
125. Policy H15 of the London Plan sets an overall strategic requirement for purpose-built student accommodation (PBSA) of 3,500 bed spaces to be provided annually. The supporting text to Policy H15 is clear that PBSA contributes to meeting London’s overall housing need and is not in addition to this need. Section 3.9 of the Mayor of London’s Housing SPG states that specialist student accommodation makes an essential contribution to the attractiveness of London as an academic centre of excellence.
126. Part A of Policy H15 states that boroughs should seek to ensure the local and strategic need for PBSA is addressed, provided that:

1. the development contributes to a mixed and inclusive neighbourhood;
  2. it is secured for occupation by students;
  3. the majority of bedrooms and all affordable student accommodation is, through a nominations agreement, secured for occupation by students of one or more higher education providers;
  4. the maximum level of accommodation is secured as affordable student accommodation and;
  5. the accommodation provides adequate functional living space and layout.
127. Part B of Policy H15 encourages boroughs, student accommodation providers and higher education providers to deliver student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes
128. Paragraph 4.15.3 of Policy H15 states that:
- “To demonstrate that there is a need for a new PBSA development and ensure the accommodation will be supporting London’s higher education providers, the student accommodation must either be operated directly by a higher education provider or the development must have an agreement in place from initial occupation with one or more higher education providers, to provide housing for its students, and to commit to having such an agreement for as long as the development is used for student accommodation. This agreement is known as a nominations agreement. A majority of the bedrooms in the development must be covered by these agreements”.*
129. Where this is not achieved, paragraph 4.15.5 states that the accommodation will be treated neither as PBSA nor as meeting a need for PBSA. Instead, the development proposal will *“normally be considered large-scale purpose-built shared living and be assessed by the requirements of Policy H16 Large-scale purpose-built shared living”.*
130. At local level, the Southwark Plan aims to deliver at least 40,035 homes between 2019 and 2036, equating to 2,355 new homes per annum. Policy ST2 of the Plan states that new development will be focussed in locations including Elephant and Castle Opportunity Area, where the aim will be to balance the delivery of as many homes as possible against creating jobs, protecting industrial and office locations, sustaining vibrant town centres, and protecting open space and heritage.
131. Policy P5 of the Southwark Plan requires PBSA proposals where all the bedspaces would be ‘direct-lets’, as is the case with the scheme proposed at 5-9 Rockingham Street, as set out below:
- As a first priority deliver the maximum amount of PBSA alongside a minimum of 35% of the habitable rooms as conventional affordable housing (subject to viability);
  - In addition to this provide 27% of student rooms let at a rent that is affordable to students as defined by the Mayor of London.

132. Policy P5 is structured in recognition of the acute need for more family and affordable housing within the borough. One of the footnotes to the policy explains that *“allowing too much student accommodation will restrict our ability to deliver more family and affordable housing. By requiring an element of affordable housing, or a contribution towards affordable housing from student housing development providing direct-lets, we can make sure we work towards meeting the strategic need for student accommodation and our local need for affordable homes including affordable family homes”*.
133. As such, the student housing policies of the Southwark Plan and London Plan, Policy P5 and Policy H15 respectively, differ in two key ways:
- Policy H15 prioritises the delivery of the maximum viable number of affordable student rooms (and does not expressly require student housing proposals to deliver conventional affordable housing either on- or off-site), whereas Policy P5 prioritises the delivery of conventional affordable housing; and
  - Policy H15 expects at least 51% of the bedspaces (the majority) to be subject to a nominations agreement, whereas Policy P5 requires all the bedspaces to be subject to a nominations agreement subject to viability.
134. Section 38(5) of the Planning and Compulsory Purchase Act 2004 (as amended) confirms that if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy contained in whichever of those documents became part of the development plan most recently. As the Southwark Plan underwent examination and was adopted more recently than the London Plan, the policies within the Southwark Plan take precedence in this instance. The Council faces a complex situation locally with regard to the provision of affordable housing; at the Southwark Plan Examination in Public, the examining Inspectors recognised this challenge as presenting specific local circumstances in Southwark with regard to PBSA, and endorsed Policy P5 cognisant that the policy requirements do not fully align with those of the London Plan PBSA policies. Essentially, this means a student housing planning application within Southwark prioritising the conventional affordable housing contribution may be acceptable in principle in policy terms, despite not fully aligning with the expectations of London Plan Policy P15.
135. When assessing the principle of a student housing scheme, the policies outlined above require consideration of:
- the principle of introducing a housing use to this site;
  - the local and strategic need for student housing;
  - whether the student housing would contribute to a mixed and inclusive neighbourhood;
  - securing the accommodation for student occupation;
  - whether a nominations agreement has been secured;
  - securing the maximum level of affordable housing subject to viability; and
  - whether adequate and functional accommodation and layouts would be provided.



136. The following paragraphs of this report assesses the proposed development against these considerations. Later parts of this report will deal with the other matters that these policies refer to, such as the affordable housing offer, quality of accommodation and transport aspects.

### Assessment

#### *Principle of introducing a housing use to this site*

137. Through its assessment of the deliverable housing sites in the borough, the Council can demonstrate a five year supply of housing land, plus the necessary 20% buffer required by the housing delivery test. As 5-9 Rockingham Street is not an identified 'allocation' site in the Southwark Plan, its redevelopment for housing has not been anticipated by the borough-wide assessment of deliverable housing sites. It would thus provide windfall housing, which the Southwark Plan anticipates will come forward at an average of approximately 601 homes per year over the period to 2036. The London Plan advises that 2.5 student bedspaces should be treated as the equivalent of a single dwelling; with 244 student rooms proposed, the development would contribute the equivalent of 98 (rounded) homes towards meeting the Council's housing targets. This would make a substantial contribution towards the 601 home annual target, and as such is welcomed. It would also reduce pressure on the local private rented market, in that it would release back to the private rented sector 98 single dwellings that would otherwise be in student occupation.
138. While the application site would be appropriate for Class C3 residential development (in which circumstances it would contribute to the Council's general housing supply as part of the windfall allowance for small sites), it has not been assumed for such development in calculating the 5 year housing land supply and buffer. The proposed student housing scheme would not compromise the Council's ability to meet its strategic housing targets set out in the Southwark Plan and London Plan, particularly because student housing contributes towards the borough's housing but also because of the relatively small size of the site.
139. For the reasons given above, the proposed student accommodation use would help contribute to, and not in any way constrain, the strategic housing delivery targets of the development plan, including the Council's vision to "build more homes of every kind in Southwark and to use every tool at our disposal to increase the supply of all different kinds of homes", as set out in Southwark Plan Policy ST2.
140. Some of the public objections received about the planning application have asserted that student accommodation does not address the need for housing and is a factor in rising rental charges across London. While these concerns are noted, for the reasons detailed above, it is considered that the development would make a contribution towards addressing housing need.

#### *Is there a local and strategic need for student housing?*

141. There is a demand for more student accommodation across London, which needs to be balanced with making sure Southwark has enough sites for other types of homes, including affordable and family housing. The affordable housing element of the current application is considered further in a separate section of this report.
142. There are several higher education institutions (HEIs) in the borough with teaching facilities and student accommodation. These include London South Bank University (LSBU), Kings College London (KCL), University of the Arts (UAL) and London School of Economics (LSE). The borough is also home to some smaller satellite campuses.
143. The evidence base underpinning the Southwark Plan included a background paper on student housing, dated December 2019. It refers to the Council's Strategic Housing Market Assessment (SHMA) Update 2019, which found that:
- major HEIs within Southwark provide a total of 23,500 course places;
  - over 21,000 students aged 20 or above live in the borough during term time;
  - at least 50% of these students live in private rented accommodation, while 15% live with their parents; and
  - there are some 7,800 bed spaces in PBSA in the borough.
144. The applicant has submitted their own Student Need Study in support of this application, prepared by Jeremy Leach Research Ltd. It notes the following key points:
- Demand:  
The numbers of full-time students in London have been increasing steadily, with a 5% rise in full time students over the last five years, and a rise of 10.4% from 2019/20 to 2020/21. This growth has been strong in the 'Central' sub-region of London (in which the site is located) and a number of the larger central London HEIs have experienced particularly high growth rates over this period, with full-time student numbers increasing the most at UCL (by 91%) and KCL (by 74%).
  - Supply:  
The growth in full-time student numbers in recent years in London has not been matched by an increase in provision of accommodation by the universities. In London, it is estimated that 14% of students living away from the parental home are housed in university maintained accommodation, compared to the UK-wide figure of 22%. Even when the provision of bedspaces by private sector developers is added to the university-maintained accommodation, the resulting levels of PBSA provision for those living away from the parental home is 22% in London, compared to the UK average of 33%.
  - Development pipeline:  
The planning pipeline for student accommodation has been relatively modest in recent years with a particular reduction in developments of

PBSA in the 'Central' sub-region. The planning pipeline for student accommodation in London totals just under 14,000 bedspaces (2,477 currently under construction, 9,041 in consented schemes and 2,312 in application-stage schemes).

- Proximity to HEIs:  
The application site is well connected, being:
  - under 5 minutes' walk from the LSBU and UAL LCC campuses;
  - under 30 minutes by public transport from the KCL Waterloo and St Thomas' campuses, the KCL Strand campus, the London School of Economics (Aldwych) and the University College of Osteopathy;
  - under 40 minutes by public transport to a number of other major university campuses including the Chelsea College of Arts (UAL), the KCL Denmark Hill campus, Goldsmiths College, the University of Westminster, UCL and City University.

145. The Student Need Study concludes that the demand for student accommodation is increasing in London but the development pipeline is not sufficient to address this, particularly in areas of high demand such as those that service the key Central London HEIs (of which the Elephant and Castle area is one). The Student Need Study considers there to be a demonstrable need and demand for student accommodation in the area, which the proposed development would address.

146. In summary, while the proposed accommodation would add to a number of pre-existing direct-let student housing developments in the borough, it would nevertheless contribute towards the borough's and London's stock of PBSA, for which there is an identified need. In this respect, the application addresses the overarching aim of Part A of London Plan Policy H15.

*Would the student housing contribute to a mixed and inclusive neighbourhood?*

147. Criterion 1 of London Plan Policy H15(A) requires student housing proposals to contribute to a mixed and inclusive neighbourhood.

148. The area surrounding the application site is characterised by a mix of uses, with commercial and conventional residential and uses predominating. Directly to the south of the site is Metro Central Heights, containing approximately 400 conventional residential homes. The S.A.H site, to the north west of the application site, is allocated for redevelopment and is expected to deliver at least 57 new homes. Other Class C3 housing nearby includes the Rockingham Estate and 251 Southwark Bridge Road. In this surrounding land use context, the proposed student-housing led scheme would sustain a mixed and inclusive community through the introduction of an alternative residential product and demographic.

149. Some members of the public have objected to the application site being redeveloped for student housing on the grounds that the location is inappropriate for students and out of character for the area. However, for the reasons given above, the location is considered suitable for a student housing use.

150. Two other location-related objections have also been raised to the site being redeveloped for student housing, as follows:

- local services and infrastructure would not be able to cope with the additional population; and
- together with the scheme at 6 Avonmouth Street for 219 student bedspaces (allowed at appeal in late 2022 under planning application ref. 22/AP/2227), which is located 100 metres to the northeast of the application site, the proposal would result in an overconcentration of student residents locally.

151. With regard to the first of these concerns, the impacts arising from the 244 new residents are discussed in the later relevant parts of this report (transport, Section 106 contributions etc.), along with the details of the mitigation secured. Mayoral and Community Infrastructure Levies, payable by the developer upon implementation of the development, can be channelled into the provision of coordinated new infrastructure to meet the needs of the local population.

152. With regard to the recent consent for student accommodation at 6 Avonmouth Street, given the low representation of PBSA schemes within the wider area, in the event that both schemes were implemented, it is not considered that together they would negatively impact the neighbourhood in terms of the mix of uses and inclusivity. On this basis, the proposed land use is considered to be broadly in conformity with the London Plan policy. Introducing a modest amount of student housing into a town centre location, and one where conventional residential uses are well represented, is not considered to cause harm.

*Would the accommodation be secured for student occupation?*

153. Criterion 2 of London Plan Policy H15(A) requires the use of the accommodation to be secured for students.

154. The proposed development will be managed by an independent provider, most probably Homes for Students, an Accreditation Network UK certified operator. As such, responsibility will rest with Homes for Students to ensure the units are let to students on courses with HEIs. Student-exclusive use will be secured by way of an obligation in the Section 106 Agreement.

155. A supporting paragraph to Policy H15 notes that boroughs should consider allowing the temporary use of accommodation during vacation periods for ancillary uses. The viability evidence base for the Southwark Plan tested direct-let student housing schemes assuming a 40 week term time tenancy with 11 week summer let allowance. In light of this, it is considered reasonable to allow the operator of the proposed student housing scheme to let the rooms during the summer period when not in use by the principal student occupiers. This will be limited to an 11-week period starting in late June and ending in early September, and will be secured through the Section 106 Agreement.

*Is a nominations agreement in place?*

156. Criterion 3 of London Plan Policy H15(A) requires the majority of the accommodation within a PBSA proposal to be secured for students, and for this to be achieved through a nominations agreement with one or more HEIs.
157. The applicant does not intend to enter into a nominations agreement with a HEI for any of the proposed accommodation; instead, the accommodation will be directly managed by an independent provider. While the proposed development would not comply with Criterion 3 of Policy H15(A) due to being 100% 'direct-let', the locally-specific and more up-to-date student housing policy (Southwark Plan Policy P5) supports direct-let student housing subject to the provision of affordable housing (which is in turn subject to viability) and additionally a proportion of the affordable student accommodation and recognises it as PBSA. Accordingly, it is considered that if a development proposal complies with the affordable requirements that Policy P5 sets out for direct-let schemes, there is a policy compliant basis in this location for student accommodation schemes to not require the securing of a nominations agreement.

*Has the maximum level of affordable housing been secured?*

158. Criterion 4 of London Plan Policy H15(A) requires the maximum level of accommodation to be secured as affordable student accommodation.
159. However, and as mentioned in earlier parts of this report, it is considered that Southwark Plan Policy P5, in its prioritisation of conventional affordable housing delivery (subject to viability), provides a legitimate alternative pathway for student accommodation proposals to provide maximised affordable housing. While such general needs affordable housing would preferably be delivered on-site, a payment-in-lieu may be appropriate in exceptional circumstances and subject to robust justification, as per the Council's Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD.
160. Turning firstly to the matter of the London Plan's specific requirement for student housing proposals to deliver affordable rooms, while this is noted, the Council's priority is for conventional affordable housing due to the pressing need in the borough. Officers consider that although there would be some benefit to providing affordable student housing, this would be significantly outweighed by the benefits arising from general needs affordable housing delivery. Therefore, the latter should be prioritised. Southwark is one of the top four London Boroughs in terms of the provision of student housing, and already contributes significantly to London's student housing needs (notwithstanding the fact that there remains an unmet demand for student housing in the borough as set out earlier in the report). In reviewing the viability of the scheme, therefore, the payment-in-lieu has been considered in terms of a contribution towards general needs affordable housing, rather than for use in reducing the rent levels of students occupying the site. Including affordable student housing within the development would adversely affect the overall viability, and therefore the level of contribution the development could make to general needs affordable housing.
161. Turning next to the Southwark Plan preference for conventional affordable housing provision to be on- rather than off-site, in the case of this particular site

it would prove extremely difficult to accommodate conventional housing alongside student accommodation. This is due to its small footprint and constrained nature, having access only from Tiverton Street and Rockingham Street, and with the railway running along the longest boundary. For example, there would not be sufficient space to accommodate separate cores or dedicated facilities ancillary to the conventional housing such as communal amenity space or playspace. Accordingly, in this instance, it is considered permissible for the redevelopment of the site not to deliver this particular requirement of Southwark Plan Policy P5, and for an in-lieu equivalent to be secured to fund the delivery of general needs affordable housing elsewhere in the borough.

162. The applicant has other student housing sites in the borough that are occupied. As a student housing provider, it does not have alternative sites where it could self-deliver the off-site affordable housing. Therefore, the payment-in-lieu from this proposal will be placed into the Affordable Housing Fund and ring-fenced to help fund the delivery of affordable housing schemes in the borough, with sites in this ward having first priority.
163. A subsequent part of this report provides some examples of council housing redevelopment sites within the vicinity of 5-9 Rockingham Street that the payment-in-lieu from this planning application could be channelled into.
164. With a payment-in-lieu having been deemed acceptable in this instance, and given the applicability of Southwark Plan Policy P5, the proposed development has been viability reviewed to determine the maximum viable contribution. In negotiation with officers and the expert viability specialist acting on behalf of the Council, and because of the way the total payment is staged across the course of the build programme, the applicant has agreed to index-link the equivalent of 35% contribution to conventional affordable housing (85.4 habitable rooms x £100,000), which equates to £8,540,000. The application of indexation ensures that the amount payable, at each of the instalment stages, keeps pace with inflation. The applicant has also offered to apply a collar of £11,161,826 to the total payment; this collar assumes a period of three and half years from planning permission to completion/occupation, with payments staged at three intervals and an inflation rate of 21.7%.
165. With a Late Stage Review and an implementation-dependent Early Stage Review to be imposed through the Section 106 Agreement, officers consider that the maximum viable amount of affordable housing has been secured, and that therefore Criterion 4 of London Plan Policy H15(A) has been met, having regard to the expectations of the more up to date Southwark Plan and considering the two development plan policies in the round.
166. The matter of viability is dealt with in detail in a subsequent part of this report.

*Does the accommodation provide adequate functional living space and layout?*

167. A supporting paragraph to London Plan Policy H15 states that schemes not securing a nominations agreement for the majority of the accommodation will normally be considered as large-scale purpose-built shared living. The London

Plan expects the quality of accommodation within purpose-built shared living schemes to be assessed against the requirements of Policy H16 “Large-scale Purpose-built Shared Living”; these are more onerous than the counterpart standards for PBSA, which are set out in Criterion 5 of Policy H15(A). However, owing to the supportive position of the Southwark Plan regarding the principle of 100% direct-let PBSA, when assessing whether the accommodation proposed by this planning application would provide adequate functional living space and layout, it is considered appropriate to do so against the standards set by Criterion 5 of Policy H15(A) rather than Policy H16.

168. Criterion 5 of Policy H15(A) requires the accommodation to be adequate and functional in terms of its living space and layout. Southwark Plan Policy P5 which requires 5% of student rooms as “easily adaptable for occupation by wheelchair users”.
169. It is considered that the proposed development would provide good quality accommodation for students, meeting the expectations of the London Plan Policy H15 Part A (5) and Southwark Plan Policy P5. The spatial arrangement, environmental internal conditions, level of amenity (within the individual units and the communal spaces), and the provision of wheelchair housing would all be adequate, as explained in detail in a subsequent part of this report entitled ‘Quality of Accommodation’.

*Is the location suitable for student accommodation?*

170. Part B of London Plan Policy H15 requires student housing scheme sites to be well connected by transport to local services. Situated within the CAZ and a Major Town Centre, the site benefits from excellent accessibility to public transport (as reflected in its PTAL rating of 6B), services and established higher educational facilities. Within a few minutes’ walk of the site are two university campuses (LSBU and the University of the Arts) as well as a wide range of leisure and recreation activities for students, including Newington Gardens open space. Furthermore, at present there is not a large concentration of student accommodation in the Major Town Centre.
171. Site Allocation NSP49 (London Southbank University Quarter) of the Southwark Plan, the red line boundary of which is approximately 100 metres to the northwest of the application site, requires redevelopment to provide research and education facilities or otherwise support the functioning of London Southbank University Quarter. While the 5-9 Rockingham Street site is located outside of this allocation, owing to its proximity to LSBU, the student housing led proposal could be seen as helping support the Council’s ambitions to consolidate this nearby strategic site as a specialist higher education cluster.

Summary on the principle of student housing

172. In conclusion, the site is considered to be appropriate in principle for student accommodation, meeting a demonstrable need and achieving compliance with the requirements of London Plan Policy H15 and Southwark Plan Policy P5. The

proposal would provide high quality accommodation for students in an accessible and sustainable area to meet local need and demand.

### Flexible retail/service/dining floorspace and Low Line promotion

#### Policy background

173. The site lies in a popular area for retail and restaurant/café operators, being located close to the centre of Elephant and Castle with a frontage onto the emerging Low Line route.
174. Policy SD4 “The Central Activities Zone” of the London Plan sets out a strategic priority to support the vitality, viability, adaption and diversification of Elephant and Castle, as a CAZ Retail Cluster, through retail and related uses. London Plan Policies E9 “Retail, Markets and Hot Food Retail” and SD7 “Town Centres; Development Principles and Development Plan Documents” provide support for, and do not permit loss of, essential convenience retail and specialist shopping in Major Town Centres. Policy SD7 requires development proposals in town centres to deliver commercial floorspace appropriate to the size and role of the town centre.
175. At the local level, Southwark Plan Policy SP4 “Green and Inclusive Economy” identifies the Elephant and Castle Major Town Centre as appropriate for delivering approximately 10,000 square metres of retail floorspace.
176. Southwark Plan Policy P35 “Town and Local Centres” sets out retail requirements in the context of the evolving role of town centres, requiring new development to provide an active use at ground floor level in locations with high footfalls. In order to secure a diversity of traders and small businesses within town centres, Policy P35 requires development proposals to:
- retain retail floorspace; or
  - replace retail floorspace with an alternative use that provides a service to the general public and would not harm the vitality and viability of the centre.
177. In the CAZ, Opportunity Areas and town centres, Policy P35 requires any proposed retail uses to be conditioned so as to restrict change of use within Class E. Retail uses are defined as those falling within Classes E[a], E[b] and E[c] – which encompasses shops, post offices, cafés, restaurants, banks, building societies, professional services, estate agents and employment agencies. Uses such as indoor sport and recreation, crèche/nursery and offices fall outside the E[a], E[b] and E[c] classifications.
178. The Southwark Plan also highlights a strategic desire for vibrant and creative uses within the borough’s railway arches. Policies P34 “Railway Arches” and P52 “Low Line Routes” of the Plan requires development within railway arches to promote the delivery of Low Line walking routes by providing active frontages and commercial or community activities. The supporting text to Policy P34 states:



*“We support and encourage creative and vibrant uses within our historic railway arches, as they are economical spaces to rent and well suited to ‘incubating’ smaller businesses and helping them to grow. They also add character and are interesting places for shops, cultural, creative and community uses and restaurants.”*

### Assessment

179. This planning application proposes a retail/service/cafe unit at ground floor level. Split between the ground floor of the main building and the middle railway arch, it would be 67 square metres GIA. The part of the unit located at the base of the tower would present a glazed frontage onto the west side of the Low Line, which would wrap around the building’s curved northern tip to create a short return frontage onto Tiverton Street. The portion within the arch would present a stretch of glazed frontage onto the eastern side of the Low Line.



*Image 24 (above): Visualisation of the restaurant/café unit, depicting how it would frame the east and west sides of the Low Line.*

180. Other parts of the building frontage would be activated by the student reception, which would include a small display window fronting Tiverton Street where public art would be promoted. Planting and a scheme of lighting would be used to enliven the remaining areas of non-active frontage.
181. The proposal would help bring into productive economic use an under-utilised railway arch, activate a section of the Low Line and introduce a new active glazed frontage along part of Tiverton Street. It would support the visitor and working populations, and would successfully integrate and co-exist with the student homes on the floors above. This achieves the aims of Policy SD4 and SD7 of the London Plan as well as Policy SP4 and P35 of the Southwark Plan, and as such is welcomed.
182. The retail outlet approved under 19/AP/0750 has a floor area of 340.1 square metres GIA. Due to 19/AP/0750 having been recently implemented, the 22/AP/1068 proposal could be viewed as effecting a loss of 274.1 square metres of retail floorspace. While the retail quantum proposed by 22/AP/0168 would be less than that in the 19/AP/0750 scheme, it would not technically constitute a “loss” of floorspace, as the 19/AP/0750 has not yet been built out. In any case, the proposed flexible unit would provide a service to the general public and deliver maximised active frontage, in turn supporting the vitality and economic growth of the Central Activities Zone, Opportunity Area, Major Town Centre and

the Low Line. Given that this is all in accordance with the above noted policies, on balance the quantum of retail floorspace proposed is considered acceptable.

183. With regard specifically to the railway arches, these have been vacant since their use ceased circa 2014. The proposal to bring these back into active use and to provide commercial Class E use within the middle arch, in line with the expectations of Policy P34.



*Image 25 (above): Cross-section through the ground floor level of the building and arches, showing how the flexible unit would present an active frontage onto Tiverton Street and two active frontages onto the Low Line walking route.*

184. In accordance with Policy P35, the proposed retail/service/dining unit will, through the use of a planning condition, be limited to Class E[a], E[b] or E[c] uses only; this will remove the right to change the use of the unit to sub-categories [d], [e], [f] or [g] as would otherwise be possible under Permitted Development Rights. This will afford the owner a degree of flexibility, while ensuring the use of the unit continues to provide a public service and active frontage.

#### Summary on the principle of flexible retail/service/dining use

185. In summary, the proposals for flexible commercial Class E floorspace are considered appropriate and acceptable in this location, revitalising long-vacant railway arches and contributing towards the vitality and economy of the Major Town Centre, Opportunity Area and Central Activities Zone.

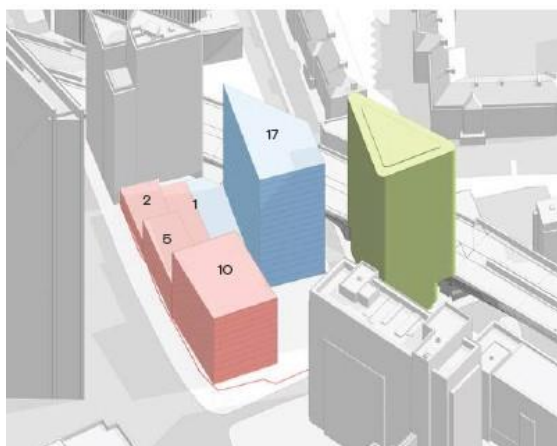
#### Conclusion on uses

186. The proposed land uses are appropriate in policy terms for this site within the CAZ, Elephant and Castle Opportunity Area and town centre. The introduction of student housing is considered to be a major benefit of the scheme, facilitating the growth of Elephant and Castle's education offer and bringing economic and housing delivery benefits through a contribution to off-site general needs affordable housing. The proposed flexible retail/service/dining unit, albeit in a smaller quantum than the retail use previously consented (and now

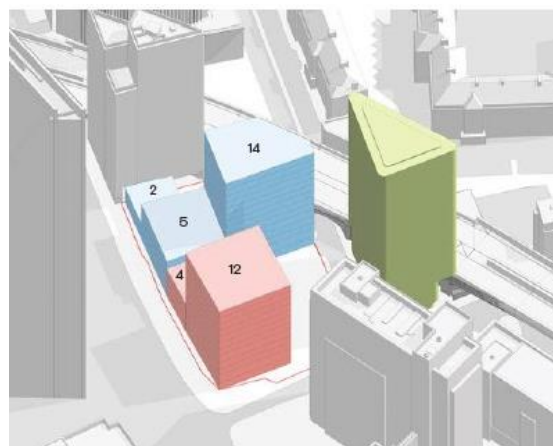
implemented) at this site, would maintain an active frontage in this high footfall location, thereby supporting the vitality and viability of the Major Town Centre.

### Impact of proposal on development potential of nearby land

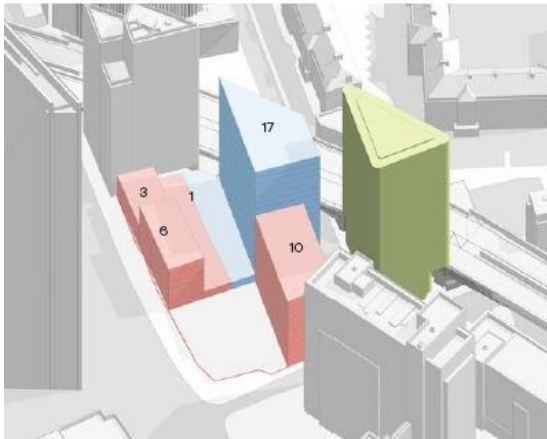
187. Southwark Plan Policy P18 “Efficient Use of Land” states that development will be permitted where it would not unreasonably compromise development potential or legitimate activities on neighbouring sites.
188. Objections were received to the planning application on the grounds that the proposal may prejudice an optimal redevelopment of the adjacent site, the S.A.H at 101 Newington Causeway, which is subject to a site allocation within the Southwark Plan, NSP47. The allocation states that the redevelopment of the S.A.H:
- must provide at least 7,030 square metres of employment floorspace;
  - must provide ground floor retail, community or leisure uses that will bring active frontages to Newington Causeway; and
  - should provide conventional residential housing (with an indicative capacity of 57 homes).
189. To demonstrate that the 5-9 Rockingham Street proposal would not compromise the ability of the S.A.H site to be redeveloped in line with the expectations of the allocation, this planning application was accompanied by four masterplanning ‘options’ exploring how the uses and quantum of development might be arranged on the S.A.H site. This optioneering exercise takes account of various other site constraints and infrastructural requirements, such as the need for communal amenity space and playspace. The four options are shown below.



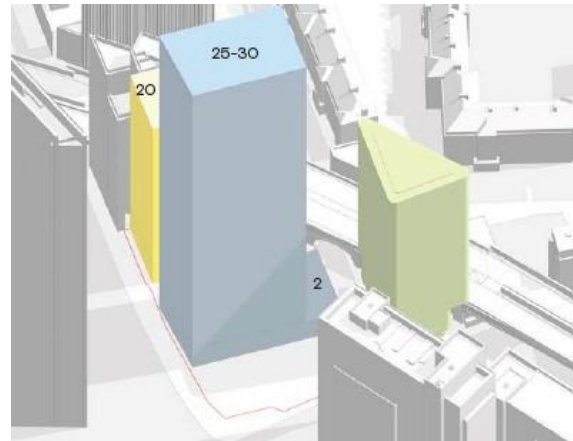
*Image 26 (above): ‘Option 1’, showing a mix of residential (red) and office (blue) uses arranged around the site’s northeastern and northwestern edges.*



*Image 27 (above): ‘Option 2’, showing office (blue) uses on the northern half of the site and residential (red) uses along Newington Causeway.*



*Image 28 (above): 'Option 3', showing a mix of residential (red) and office (blue) uses, with the taller elements located closer to Tiverton Street.*



*Image 29 (above): 'Option 4', where two taller buildings containing a hotel (yellow) and office (blue), would occupy the north of the site, creating a public space on Rockingham Street.*

190. One of the outcomes, 'Option 4', was based on public exhibition material from two community consultation events held in 2022 for the S.A.H site, together with additional information sourced directly from the developer about the emerging proposals. As such, of the four outputs, 'Option 4' is considered to be the most realistic scenario for how development, in terms of building forms and arrangement of uses, will come forward on this neighbouring allocated site.
191. 'Option 4' shows a public space to the south of the S.A.H site. An office building of between 25 and 30 storeys would be positioned to the north of this open space, minimising overlooking and overshadowing of the Rockingham Street proposal to the east, as well as the Metro Central Heights building to the south. However, Option 4 is predicated on the 25-30 storey building being set back from the Tiverton Street boundary to create a separation distance of 18 metres to the 5-9 Rockingham Street proposal, which cannot necessarily be assumed. In the event that the S.A.H redevelopment was to introduce boundary-edge development along Tiverton Street, the separation gap to the 5-9 Rockingham Street scheme would be only 8 metres.
192. The Mayor of London's Housing SPG (2016) sets out that:

*"Designers should consider the position and aspect of habitable rooms, gardens and balconies, and avoid windows facing each other where privacy distances are tight. In the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 – 21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). These can still be useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city, and can sometimes unnecessarily restrict density".*

193. At the local level, and with regard specifically to preventing harmful overlooking of dwellings, the 2015 Technical Update to the Residential Design Standards SPD 2011 requires developments to achieve:

- a distance of 12 metres between windows on a highway-fronting elevation and those opposite at existing buildings; and
- a distance of 21 metres between windows on a rear elevation and those opposite at existing buildings.

194. It is recognised that a 8 metre façade-to-façade distance would be an intense relationship between two tall buildings, likely to give rise to a canyon-like environment along this stretch of Tiverton Street, albeit for only approximately 11 metres where the two buildings run parallel (as shown in the image to the right). However, it would be reasonable to expect the S.A.H scheme, as the site coming forward later and with greater flexibility owing to its larger footprint, to set-back a short distance from the Tiverton Street boundary if this was deemed necessary to achieve a comfortable across-street relationship.

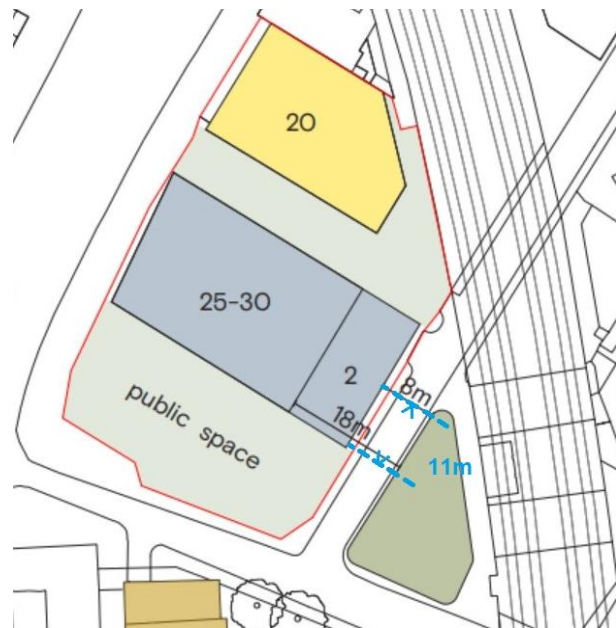


Figure 30 (above): Option 4, shown in plan with approximate dimensions in relation to the 5-9 Rockingham Street proposal.

195. With regard specifically to the constraint the 5-9 Rockingham Street proposal would place on the S.A.H redevelopment to protect the privacy of the student occupiers, there are no definitive proposals before the Council for development on the S.A.H site against which to judge the guidelines set out in the Mayor's SPD and the Residential Design Standards SPD. A minimum distance to protect privacy of 21-18 metres in this context is not an absolute, and there are design interventions that development on the S.A.H site could take to mitigate the impact on privacy and provide a more spacious street environment. It should also be noted that the proposed student housing development features less glazing on the Tiverton Street elevation than the implemented (office) scheme, and features regularly spaced windows. As such, any privacy or overlooking concerns for future residents could feasibly be mitigated through the design of the S.A.H site, for example by staggering the windows and/or restricting the splays such that no windows to habitable rooms are directly facing each other.

196. While it is recognised that the 5-9 Rockingham Street proposal would place a constraint on the S.A.H site, the proposal would not unreasonably compromise development at the S.A.H because mitigation to manage any impact on privacy and streetscape environment can be designed into any future development. In summary, should the 5-9 Rockingham Street proposal be built out, many different

options would remain available to the developer of the S.A.H site to deliver the requirements of NSP47.

## **Development viability**

### Policy background

197. Southwark's Development Viability SPD requires a Financial Viability Appraisal (FVA) to be submitted for all planning applications which trigger a requirement to provide affordable housing. Southwark's Development Viability SPD pre dates the current London Plan and Southwark Plan policies for student housing. Nonetheless the FVA should also identify the maximum level of affordable housing that can be sustained within a direct let scheme as a first priority and additionally identify if 27% of the student rooms within the development can be let at an affordable rent, as required by Policy P5 "Student Homes".
198. The SPD, in requiring an in lieu payment of £100,000 per habitable room of conventional affordable housing, effectively establishes the minimum payment-in-lieu a scheme should deliver. However, the policy expectation, as per Southwark Plan Policy P5, is for development proposals to deliver the *maximum* viable amount. It should also be noted that the SPD does not provide an in lieu figure for affordable student housing, as the SPD was drafted before the current London Plan policy was adopted.
199. Earlier parts of this report have explained the rationale for this proposal to deliver no on-site affordable student housing, and to instead deliver a 100% direct-let scheme with a payment-in-lieu towards off-site affordable housing. For the proposed development, a 35% provision equates to 85.4 habitable rooms, resulting in a minimum expected contribution of £8,540,000 as an in-lieu payment to the Council to use for providing affordable housing.
200. The applicant has submitted a Financial Viability Assessment (FVA) in accordance with the Affordable Housing SPD and Southwark Plan Policy P5 to allow an assessment of the maximum level of affordable housing that could be supported by the development. The appraisal was reviewed by BNP Paribas on behalf of the Council.

### Assessment

#### Findings of the viability review process

201. The applicant's FVA, prepared by Doug Birt Consulting, establishes the proposed student housing scheme based on the AUV of the recently-implemented office-led scheme (19/AP/0750). The FVA indicates a Residual Land Value (RLV) for the site of £6,671,262 and a Benchmark Land Value (BLV) of £6,629,000. With a nominal differential between these two figures of £42,262, the FVA concludes that the proposed scheme can only viably sustain the proposed affordable housing contribution of 35% (i.e. there would be no surplus).

202. These values differ from the findings of BNP Paribas' viability review, which indicates that the scheme could viably support the applicant's 35% equivalent affordable housing offer while generating a surplus of £9,997,277. This is on the basis of a RLV of £14,318,620 and a BLV of £4,321,343.
203. The applicant's assessor fundamentally disagreed with BNP Paribas' inputs and findings, contending that a payment-in-lieu of £18,447,227 (i.e. the £8,540,000 baseline plus the £9,997,277 identified surplus) would make the scheme unviable such that the planning application would not be pursued.
204. BNP Paribas carried out some sensitivity analysis whereby the student housing investment yield was adjusted from 4.0% to 4.25%. At 4.25%, the surplus would reduce to £4,699,255. This demonstrates the sensitivity of viability testing to small changes in inputs. Nevertheless, even at this higher yield, the scheme surplus would be substantial.
205. BNP Paribas has acknowledged that there are other costs that will potentially militate against the applicant being able to make a payment of as much as £18,447,227 (the affordable housing payment-in-lieu and the surplus), which their FVA review did not account for. These include any indexation applied to other Section 106 contributions and the community infrastructure levies. Furthermore, costs may or may not increase due to changes to Building Regulations (one such example being the 2021 changes to Part L), and various building contract issues such as supply and demand of products and labour. Some consideration needs to be given to costs such as these which fall outside the remit of, or cannot be forecasted and factored-into with any accuracy, a typical viability process at the planning application stage. The proposed Late Stage Review would identify the actual total costs incurred by the applicant in building the scheme, and would compare these to the estimated costs in the application-stage viability report, enabling a proportion of any surplus profit that might be generated to be captured.

*Payment-in-lieu offer*

206. Notwithstanding the considerations set out in the preceding paragraph, the magnitude of the surplus reported by BNP Paribas was such that officers insisted on an improvement to the applicant's payment-in-lieu offer to ensure the maximum viable amount was secured. As part of the negotiations that ensued, officers made clear to the applicant that affordable housing payments-in-lieu are index-linked as a matter of routine; this mechanism offsets the depreciation that would otherwise occur due to inflation. The applicant expressed concerns about offering an index-linked payment-in-lieu of more than £8.54 million in the current highly inflationary environment, their argument being that this would be prohibitive to delivering the scheme (i.e. should the current economic climate persist, build and financing costs will continue to climb, but the pressures on households, spending and borrowing mean the real estate market may not necessarily keep pace).
207. To directly address this concern, and at the request of the Council, BNP Paribas modelled three different inflation scenarios, one for each of the three main

construction price and cost indices, to estimate what the baseline figure of £8.54 million would equate to at the approximate point in time that the final instalment would be triggered (this being ten quarters' time). These three modelling exercises relied on best-estimate industry forecasts. The modelling accounts for a payment-in-lieu instalment programme as follows:

- 25% of the payment-in-lieu prior to implementation;
- 50% of the payment-in-lieu prior to practical completion; and
- 25% of the payment-in-lieu prior to occupation.

208. The results are summarised below:

Index Method	Calculation Rate (Q1 2023 to Q3 2025)	Total affordable housing payment-in-lieu at Q3 2025	Uplift on base position
BCIS 'All in' Tender Price Index	4.86%	£9,617,777	£1,167,777
BCIS 'General Building Cost' Index	8.22%	£9,925,277	£1,475,277
Retail Price Index	17.9%	£10,813,306	£2,363,306

209. BNP Paribas carried out the same exercise, but with an adjustment to account for the start-on-site being deferred for one year. This scenario produced the following estimates for what the baseline figure of £8.54 million would equate to at the point in time the final instalment is triggered (this being fourteen quarters' time):

Index Method	Calculation Rate (Q1 2023 to Q3 2026)	Total affordable housing payment-in-lieu at Q3 2025	Uplift on base position
BCIS 'All in' Tender Price Index	8.11%	£9,915,234	£1,465,234
BCIS 'General Building Cost' Index	10.86%	£10,167,459	£1,717,459
Retail Price Index	21.7%	£11,161,826	£2,711,826

210. As the two tables above show, the estimated uplift on the baseline amount of £8.54 million could be anywhere between £1,167,777 and £2,711,826, depending on the index applied and whether construction commences immediately or not for a year post-permission. BNP Paribas accompanied their findings with the following conclusion:



*“As our viability assessment results in a surplus of £9,363,459, the amount at the upper end of this range [i.e. £11,161,826] is easily accommodated within the surplus”.*

211. On the basis of the above exercises carried out by BNP Paribas, and in order to progress the negotiations, the applicant improved their payment-in-lieu offer by agreeing to index-link the £8.54 million sum and include a collar at £11,161,826. The figure of £11,161,826 was chosen because it was the outcome of BNP Paribas’ “worst-case” inflation trajectory scenario i.e.:

- applying RPI, the index with the highest percentage rate of 21.7%, to the baseline £8.54 million; and
- assuming a deferral of start-on-site for one year following grant of planning permission, thereby protracting the overall programme and in so doing delaying the payment trigger points.

212. The applicant has indicated a strong commitment to starting on site as soon as practically possible post-permission, but has nevertheless agreed to set the collar at the highest of the forecasted figures, which assumes one year start-on-site deferral. As the payment-in-lieu is collared but not capped, if by the time the final instalment is triggered inflation has run much higher than expected such that the total due exceeds £11,161,826, the applicant must pay the surplus. This will guarantee that the Council receives at the very least the appreciated equivalent of the £8,540,000, and at the very least £11,161,826, but in all probability an uplift on this.

213. The Section 106 Agreement will secure an Early Stage Review in the event of implementation being delayed for more than two years, as well as the Late Stage Review, in accordance with Policy H5 (F) (2). As student housing is not typical ‘for sale’ housing, and the value relies on the rent levels achieved, it is proposed that the Late Stage Review be carried out after the first full academic year of occupation of the development. In this case, the maximum additional payment the applicant would be liable for should the Late Stage Review reveal a surplus is £1,300,000 (13 habitable rooms x £100,000). This is based on £100,000 per extra habitable room (or part thereof) that would need to be provided as affordable (equivalent) to bring the total proportion up to 40% and thereby meet the Council’s Fast Track threshold.

214. BNP Paribas have considered the applicant’s collared payment-in-lieu offer and, in the knowledge that appropriate review mechanisms would be secured in the Section 106 Agreement, have advised as follows:

*“Broadly and upon consideration of the assessment in our draft viability report and exploration of the indexation parameters, we consider that the Applicant’s offer is reasonable”.*

*Potential allocation of the Payment-in-Lieu*

215. Launched in 2013, Southwark’s ‘Council Homes Building Programme’ has delivered approximately 2,500 starts on site to date, with a target to build a further

1,000 homes by 2026. For budgetary reasons, a directorial decision was issued in 2022 to put on hold any Council housing projects not contractually agreed by the end of that calendar year. Such schemes would, therefore, only be able to proceed should other sources of funding be secured. One such alternative form of funding is affordable housing payments-in-lieu from development sites in the borough.

216. The Elim Estate project is an example of how the payment-in-lieu from the 5-9 Rockingham Street proposal could be directed into reviving stalled sites. To be delivered on the Council's behalf by the Leathermarket JMB, the Elim Estate redevelopment could create a total of 32 new homes, all to be social rent, alongside new community space and indoor recreation facilities.



*Image 31 (above): Aerial view of the Elim Estate (comprising three parcels of land, shown pink) and early/indicative massing of the three proposed buildings.*

217. It is likely that the funding would be allocated to eligible sites on the following locational 'cascaded' basis:

- First priority - Chaucer Ward;
- Second priority - Elephant and Castle Opportunity Area;
- Third priority - Southwark.

218. Another nearby stalled scheme is on Rodney Place, which proposes nine new homes and a commercial unit located on a former windscreen repair shop site. Although not within the Chaucer ward, this site is in the Elephant and Castle Opportunity Area.



219. As these examples demonstrate, the payment-in-lieu secured by this planning application could potentially be used to directly support the delivery of affordable housing close to the application site, thereby bringing tangible benefits for the local community.

*Figure 32 (above): Artist's impression of the proposed Rodney Place redevelopment.*

### Conclusion on viability

220. The London Plan and Southwark Plan contain policies seeking the maximum reasonable and financially viable amount of affordable housing in proposed developments. These policies at London and borough levels allow for a commuted sum in exceptional circumstances, and the NPPF acknowledges that there may be circumstances where a payment-in-lieu can be justified. Where it is clear that a payment-in-lieu approach would deliver more (and more appropriate) affordable housing, a commuted sum is acceptable.

221. The Council would use a payment-in-lieu for the purposes of delivering truly affordable housing through its Council Homes Building Programme. The payment in lieu of £8.54 million index-linked (with collar) offered by the applicant is substantial and could deliver a number of new affordable homes, of a better quality and higher number than could be provided on site. The acceptability of the offered payment-in-lieu is based on the specific merits of this proposal, taking account of all the material considerations highlighted above. It is considered that the Council Homes Building Programme is the most effective way to provide affordable housing, to the extent that any departure from the on-site preference of the NPPF, London and Southwark Plan is justified (for the above reasons based on the specific merits of this student housing proposal).

### **Quality of residential accommodation**

222. Although student housing falls within the "Sui Generis" use class, it comes with many of the same functional, amenity and environmental requirements as conventional residential development. As such, it is necessary to give regard to the development plan policies concerned with residential uses when considering the acceptability of student housing proposals.

223. The Southwark Plan does not prescribe any minimum space standards with respect to student accommodation. Policy P15 "Residential Design", which sets out the standards for new homes generally and includes a 17-point criteria, is

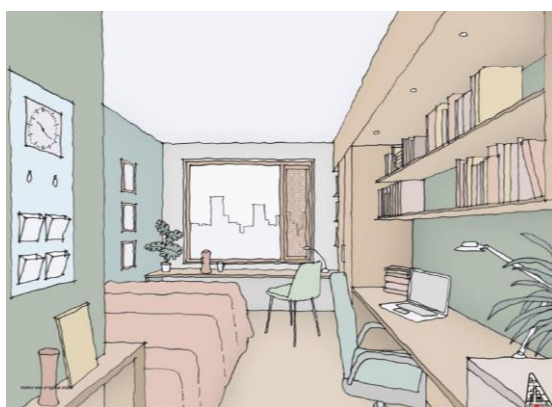
clearly designed for conventional residential housing. Nevertheless, it is not unreasonable to expect student housing proposals to achieve some of those criteria, namely:

- Criteria 1 - Provide a high standard of quality of accommodation for living conditions;
- Criterion 6 - Provide acceptable levels of natural daylight by providing a window in every habitable room;
- Criterion 7 - Achieve a floor to ceiling height of at least 2.5 metres for at least 75 per cent of the Gross Internal Area of each dwelling to maximise natural ventilation and natural daylight in the dwelling; and
- Criterion 14 - Provide communal facilities.

224. There are no other local-level requirements that student housing proposal should meet in terms of quality of accommodation.

### Spatial arrangement

225. The majority of the 244 student bedrooms would take the form of en-suite 'studios' containing all the necessary facilities to meet the sleeping, living and food preparation needs of the individual occupier. A smaller proportion of the units would be two-bedroom shared flats (described by the applicant as 'two-dios'), where the occupiers would have a private bedroom but share the kitchen, living and bathroom facilities. The smallest studio would be 16.0 square metres GIA and the largest would be 26.5. With regard to the 'two-dios', these would range from 44.1 to 44.4 square metres GIA, with the bedrooms in each being 13.6 and 16.8 square metres GIA. While some of the units are of an efficient configuration, the proposed layouts include furnishings to illustrate how queen sized beds, dining and seating space could be accommodated within each of the units in a way that would not be cramped or impractical for use. On balance, the flats are considered to be of an adequate size and layout.



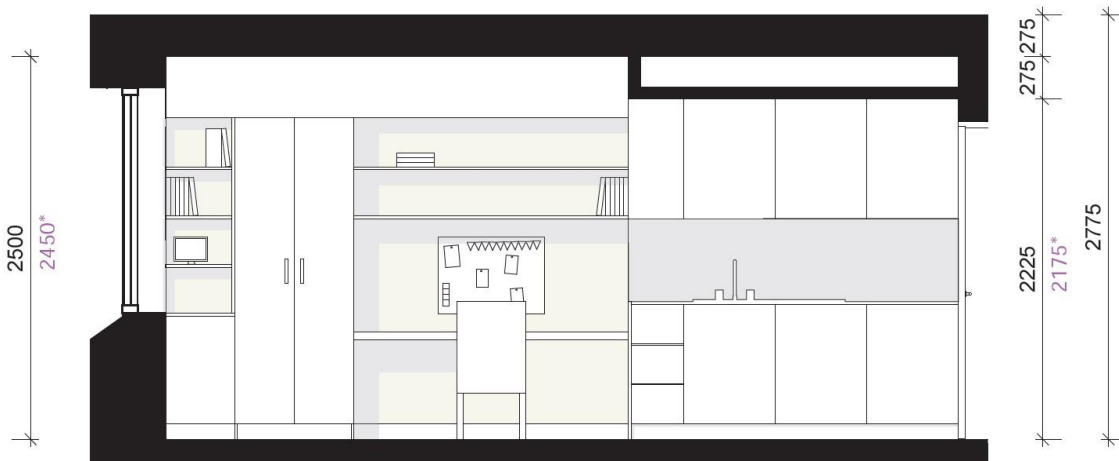
*Image 33 (above): Artist's impression of a standard studio bedroom.*



*Image 34 (above): Artist's impression of the kitchen/dining area in a two-dio.*

226. The majority of the student bedrooms would achieve 2.5 metre floor-to-ceiling heights within the main study and sleeping area, dropping to 2.225 metres in the kitchen and bathroom areas to allow for mechanical ventilation equipment in a bulkhead. Only the shared studios at the northern tip of each floorplate would

have floor-to-ceiling heights lower than this due to being located on the cantilever (where deeper floor profiles are needed); in these instances, the floor-to-ceiling height would be 2.45 metres, dropping to 2.175 metres. The dual aspect nature of these units would provide some mitigation for the lower floor-to-ceiling height. 38 of 244 bedrooms are affected, equating to 16%. While not achieving full accordance with Policy P15, officers consider that the floor-to-ceiling heights within these particular units would not give rise to a cramped or claustrophobic living environment.



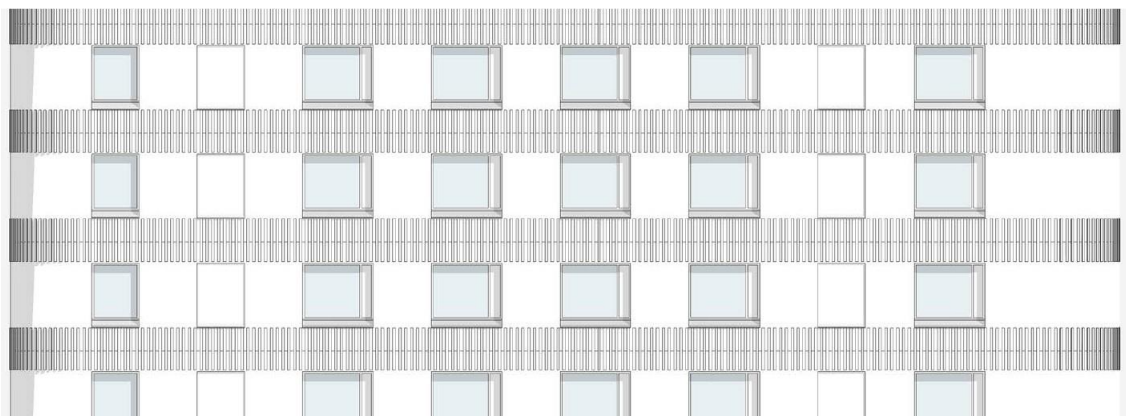
*Image 35 (above): Cross-section through a typical studio, showing the head heights that would be achieved in the study/sleeping area and in the kitchen/bathroom area.*

### Environmental comfort

227. A Noise and Vibration Impact Assessment accompanies the application, which outlines the façade and ventilation strategy, including mechanical ventilation and sound insulation performance for both the glazed and non-glazed elements of the façade. While the ambient background noise in this location is such that windows could not be left open for long periods of the day, the report identifies that no significant adverse impacts are predicted in relation to noise or in relation to vibration levels.
228. Each student room would incorporate at least one window with an openable decorative grille panel to one side of the principal glazed pane. This grille would allow for a degree of manually-controlled passive ventilation and thermal control. Comfort cooling would be available in the rooms to complement the natural ventilation.
229. The Environmental Protection Team are satisfied that an acceptable level of amenity would be secured for the student occupiers. A subsequent section of this report entitled 'Energy and Sustainability' deals in more detail with the environmental strategy for the accommodation.

### Outlook, sense of openness and privacy

230. Outlook, sense of openness and privacy are all very important considerations for student housing proposals, as unlike conventional housing which provides occupiers with multiple rooms and a variety of outlooks, the single-aspect bedrooms would be in many cases the only space inhabited by the occupiers, and they would do so for much of the year.
231. In the current day context, all rooms would benefit from good outlook and levels of privacy.
232. In a potential future scenario where the S.A.H site is redeveloped, there is a possibility that built form would be introduced directly opposite the northwest-facing student rooms, potentially at a façade-to-façade distance as close as 8 metres. It is likely that such a relationship would give rise to a feeling of enclosure within the proposed student rooms, particularly those on the lower floors where the lower levels of natural light would intensify the sense of enclosure. However, there are no definitive proposals before the Council for development on the S.A.H site against which to judge the impact on the 5-9 Rockingham Street student rooms. As the 5-9 Rockingham Street scheme is the proposal coming forward first, the proposals for the S.A.H site will be expected to make reasonable adjustments to account for the proximity of the student rooms, for instance by setting-back from the Tiverton Street boundary or limiting the height of any boundary-flanking built form. It is considered that acceptable levels of outlook and openness can be achieved for the student rooms without unreasonably curtailing the development potential of the S.A.H site.
233. Again with regard to a potential future scenario where the S.A.H site is redeveloped, if windows were to be proposed close to or on the Tiverton Street boundary this could put the northwest-facing student rooms at risk of overlooking. However, because the windows on the Tiverton Street elevation of the student housing proposal are regularly spaced, this would provide an opportunity for the S.A.H redevelopment to arrange its windows at inverted intervals to avoid any direct window-to-window relationship. Other architectural devices such as chamfered reveals could be employed at the S.A.H to aide privacy. As such, it can be concluded that good levels of privacy can be achieved in the long-term for the student occupiers.



*Image 36 (above): Cropped view of the proposal's Tiverton Street elevation, showing the regular spacing of the bedroom windows, providing opportunities for staggered windows on any redevelopment opposite at the S.A.H site.*

## Daylight

234. In new buildings, the BRE 2022 guidelines recommend calculating 'illuminance' to determine whether a dwelling will appear reasonably daylight. The UK National Annex gives illuminance recommendations of:
- 100 lux in bedrooms;
  - 150 lux in living rooms; and
  - 200 lux in kitchens.
235. These are the median illuminances, to be exceeded over at least 50% of the assessment points in the room for at least half of the daylight hours.
236. Where a room has a shared use, the highest illuminance target should apply. However, in the interests of discouraging applicants from designing small separate windowless kitchens, a degree of design flexibility can be applied in the case of a combined living/dining/kitchen area if the kitchens are not treated as habitable spaces.
237. With respect to daylight, 277 of the 281 rooms assessed (99%) would comply with the BRE 2022 guidelines for daylight amenity. The four rooms not meeting the guidance are:
- the communal hub at mezzanine level located at the building's northern tip;
  - two studios, one at second floor level and one at third floor level, both located on the Tiverton Street frontage towards the building's northern tip; and
  - a kitchen serving one of the student rooms, located at fifth floor level.
238. The two studios not meeting the guidance would achieve the target lux to 39% and 42% of their respective areas and the illuminance drawings demonstrate that the living areas would receive high lux levels, with the area not meeting the guidance at the rear of the room, where the kitchens (which typically rely on a degree of artificial lighting) are located. Overall the daylight performance would have a degree of impact on the residential amenity of the occupiers of these two rooms, but not harmfully so.
239. Neither the communal hub nor the individual kitchen would be used in the intensive and continuous way that a bedroom can be, and as such the deviation from the BRE guidance in these two instances is considered acceptable.
240. In summary, the analysis results show a very high level of compliance, with the vast majority of rooms meeting the BRE's illuminance guidelines. It is therefore considered that the future occupants of the development would have access to adequate levels of daylight.

### Sunlight

241. In new buildings, the BRE 2022 guidelines recommend calculating the 'sunlight exposure' to assess whether a dwelling will appear reasonably sunlit. This test measures the hours of sunlight that could be received at the centre point of each window on 21<sup>st</sup> March.
242. The BRE recommends that:
- through site layout design, at least one main window wall should face within 90-degrees of due south;
  - a habitable room, preferably a main living room, should receive a total of at least 1.5 hours of sunlight on 21<sup>st</sup> March; and
  - where groups of dwellings are planned, site layout design should aim to maximise the number of dwellings that meet the above recommendations.
243. In housing, the main requirement for sunlight is in living rooms. It is viewed as less important in kitchens and bedrooms.
244. There are 129 rooms within the development that are served by at least one window orientated within 90-degrees of due south and the analysis shows that 128 of these rooms (99%) would receive at least 1.5 hours of sunlight on 21<sup>st</sup> March. The one room that would not achieve the sunlight exposure target is located directly beneath a cantilevering storey, restricting its ability to receive sunlight. While the impacts on this one occupier must be noted, the levels of sunlight exposure would not be harmfully low.
245. In summary, the analysis results show a very high level of compliance, with the vast majority of rooms meeting the BRE's sunlight exposure guidelines. It is therefore considered that the future occupants of the development would have access to adequate levels of sunlight.

### Wheelchair rooms

246. The proposed development would provide the following wheelchair accommodation:
- 8 studios would be 'wheelchair accessible' i.e. fully fitted-out and readily usable by a wheelchair user at the point of completion [M4(3)(2)(b) equivalent]; and
  - 5 studios would be 'wheelchair adaptable' i.e. easily adapted to meet the needs of a wheelchair user [M4(3)(2)(a) equivalent].
247. Together, the 13 wheelchair user studios represent 5% of the total number of bedspaces, meeting the minimum requirement of Southwark Plan Policy P5. The 8 'wheelchair accessible' studios would ensure options are available for potential wheelchair occupiers who need to move in immediately and could not wait for adaption works to be carried out (e.g. those have gone through clearing and are applying for accommodation just before the start of term). The wheelchair user accommodation would be secured through the Section 106 Agreement.



## Communal facilities

248. In addition to the private and shared spaces within the units themselves, internal communal amenity spaces are proposed. These would be distributed throughout the building to offer a range of different spaces for communal amenity and include:

- a ground floor foyer, to be furnished with informal seating;
- two student communal hubs on the mezzanine level, one of which would include a light well to provide an area of double-height space over the foyer below;
- a study/library space and a laundry room on first floor;
- a 'quiet study' room on the second floor;
- a 'quiet study' room on the third floor; and
- a top floor lounge and relaxation room with views south across the city.



*Image 37 (above): Floorplans of the six levels of the building where communal amenity facilities, depicted in light green, would be provided.*

249. In total, these communal amenity spaces would be 327 square metres, which equates to 1.34 square metres per student. This is considered to be in accordance with the levels of internal communal amenity space provided on other student schemes across London and the borough.

250. The laundry room at first floor level would be equipped with 4 washers and 4 driers. Although a member of the public has objected on the grounds that these facilities are too few for the number of bedspaces proposed, the number conforms to the ANUK ratio standards (1:75). There would also be a card-based payment system that can be topped up on site as well as a laundry app, enabling students to see if machines are in use and how their wash is progressing. This provision is considered adequate.

#### Access to outdoor space

251. The proposed development would provide no dedicated outdoor space, either individual (e.g. balconies) or communal (e.g. roof gardens). However, the students would also have ready access to Newington Gardens, a park approximately 150 metres to the northeast. In recognition of the additional maintenance costs to the Council from this increased/intensified use of the park, and to allow for improvement works (such as planting, seating, additional bins, paths and potential entrance changes), a financial contribution of £108,214 (index-linked) has been requested from the applicant. This will be spent by the Council in relation to Newington Gardens only. It is considered that this is necessary to directly mitigate the increased intensity, and attendant impacts, on this nearby public park arising from the additional student population.

#### Conclusion on quality of residential accommodation

252. In conclusion, and although some of the respondents to the public consultation have raised concerns about the quality of life for the student occupiers particularly for those whose bedrooms would face the railway line, the proposal would achieve high quality living accommodation for students. A range of room sizes and shared facilities is proposed, achieving good internal natural light and outlook. There has been clear consideration of accessibility, and a financial contribution towards investment in a nearby public outdoor space would be secured. The development would provide good functional living spaces and layout for future student occupiers, thereby complying with London Plan Policy H15, while also meeting the four relevant criteria of Southwark Plan Policy P15.

### **Amenity impacts on nearby residential occupiers and the surrounding area**

253. The importance of protecting neighbouring amenity is set out in Southwark Plan Policy P56, which states “development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users”. The 2015 Technical Update to the Residential Design Standards SPD 2011 expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.

#### Daylight and sunlight

254. The NPPF sets out guidance with regards to daylight/sunlight impact and states “when considering applications for housing, authorities should take a flexible

approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site". The intention of this guidance is to ensure that a proportionate approach is taken to applying the BRE guidance in urban areas. London Plan Policy D6 sets out the policy position regarding this matter and states "the design of development should provide sufficient daylight and sunlight to new and surrounding houses that is appropriate for its context". Policy D9 states that daylight and sunlight conditions around tall building(s) and the neighbourhood must be carefully considered. Southwark Plan policies identify the need to properly consider the impact of daylight/sunlight without being prescriptive about standards.

255. The BRE Guidance sets out the rationale for testing the daylight impacts of new development through various tests. The first and most readily adopted test prescribed by the BRE Guidelines is the Vertical Sky Component assessment (VSC). This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by approximately 20% of the original value before the loss is noticeable.
256. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method, which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight may be affected.

#### Properties assessed for daylight impacts

257. This planning application was accompanied by a daylight and sunlight assessment undertaken in accordance with the BRE guidelines. The document assesses the extent to which the proposed development would affect the dwellings in the following buildings:
- 1) Metro Central Heights;
  - 2) 6-8 Tiverton Street;
  - 3) Stephenson House, Rockingham Estate;
  - 4) Rennie House, Rockingham Estate;
  - 5) Rankine House, Rockingham Estate; and
  - 6) Wellesley Court, 15 Rockingham Street.
258. The above properties were tested for VSC and NSL impacts, but not illuminance as this method is more appropriately applied to new buildings.
259. The applicant's daylight and sunlight assessment also undertook testing of 91-93 Tiverton Street and 73-75 Newington Causeway, both of which are buildings to the north of the site containing dwellings. However, by reason of their distance from and relationship to the site, neither of these buildings would experience any daylight impacts above the recommendations of the BRE guidance. Therefore,

this report gives no further consideration to the daylight impacts on these residential properties.

260. Provided below is a map of the residential buildings (in dark grey) showing their relationship to the application site (in turquoise):

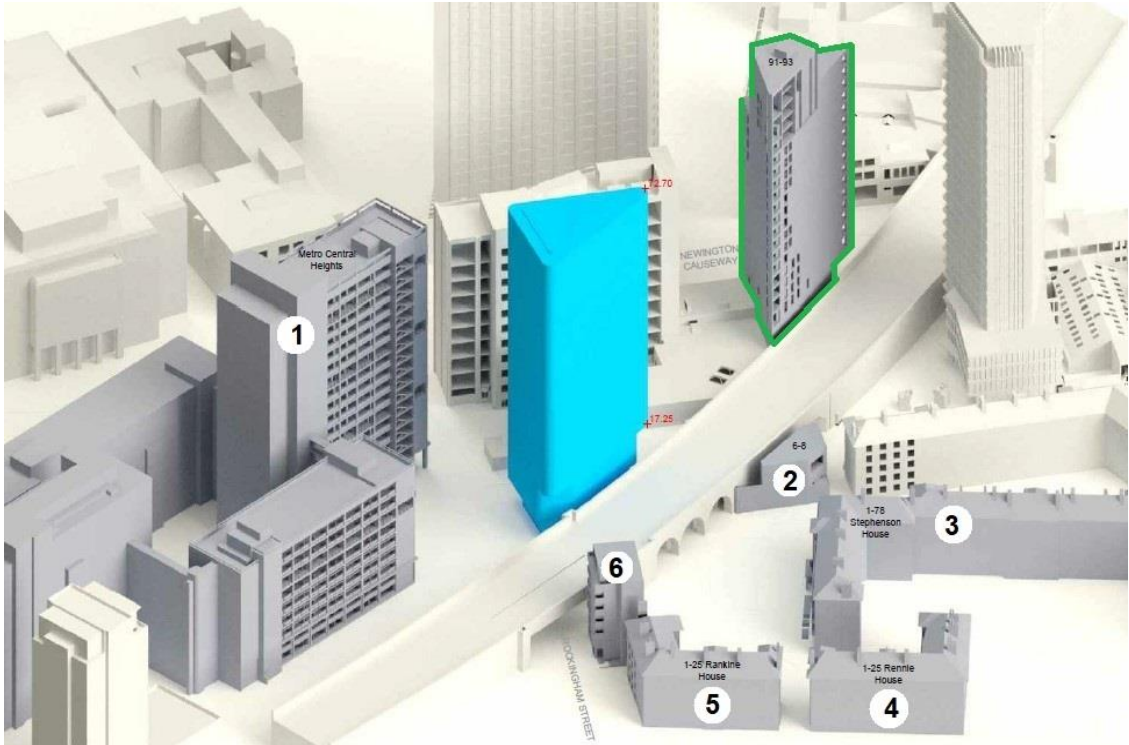


Image 38 (above): Model of the site with the surrounding existing sensitive residential buildings shown in dark grey. 91-93 Tiverton Street (edged in green) and 73-75 Newington Causeway (obscured in this view) are not accounted for in the subsequent parts of this report as none of the windows experience losses in excess of the BRE guidelines.

VSC and NSL impacts for sensitive surrounding residential properties

261. The table below summarises the VSC impacts to surrounding properties as a result of the proposed development being built-out in the present day context:

Property	Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
<b>Metro Central Heights</b>				
Total no. habitable windows tested: 524				
<ul style="list-style-type: none"> <li>Of the 524 windows, 168 would retain a VSC of 27% or more.</li> </ul>				

<ul style="list-style-type: none"> <li>For the <u>356</u> that would not, the distribution of percentage reductions is:</li> </ul>				
Proposed vs existing	229	41	47	39**
<p>** The applicant's report suggests three windows would undergo a substantial adverse percentage change to 0%. However, this is an anomaly of the presentation format. While the three windows would indeed have a resulting VSC of zero, their starting/existing VSC is zero. There would, therefore, be no change. As such, the table above categorises these three results as 'no loss' rather than as a '40%+' loss.</p>				
<b>6-8 Tiverton Street</b>				
Total no. habitable room windows tested: 15				
<ul style="list-style-type: none"> <li>Of the 15 windows, 1 would retain a VSC of 27% or more.</li> <li>For the <u>14</u> that would not, the distribution of percentage reductions is:</li> </ul>				
Proposed vs existing	12	2	0	0
<b>Stephenson House, Rockingham Estate</b>				
Total no. habitable room windows tested: 85				
<ul style="list-style-type: none"> <li>Of the 85 windows, 2 would retain a VSC of 27% or more.</li> <li>For the <u>83</u> that would not, the distribution of percentage reductions is:</li> </ul>				
Proposed vs existing	62	19	2	0
<b>Rennie House, Rockingham Estate</b>				
Total no. habitable room windows tested: 45				
<ul style="list-style-type: none"> <li>Of the 45 windows, none would retain a VSC of 27% or more.</li> <li>The distribution of percentage reductions across these 45 windows is:</li> </ul>				
Proposed vs existing	34	4	1	6
<b>Rankine House, Rockingham Estate</b>				
Total no. habitable room windows tested: 60				
<ul style="list-style-type: none"> <li>Of the 60 windows, 17 would retain a VSC of 27% or more.</li> <li>For the <u>43</u> that would not, the distribution of percentage reductions is:</li> </ul>				
Proposed vs existing	33	9	0	1
<b>Wellesley Court, 15 Rockingham Street</b>				
Total no. habitable room windows tested: 26				

	<ul style="list-style-type: none"> <li>Of the 26 windows, 10 would retain a VSC of 27% or more.</li> <li>For the <u>16</u> that would not, the distribution of percentage reductions is:</li> </ul>
Proposed vs existing	10      6      0      0

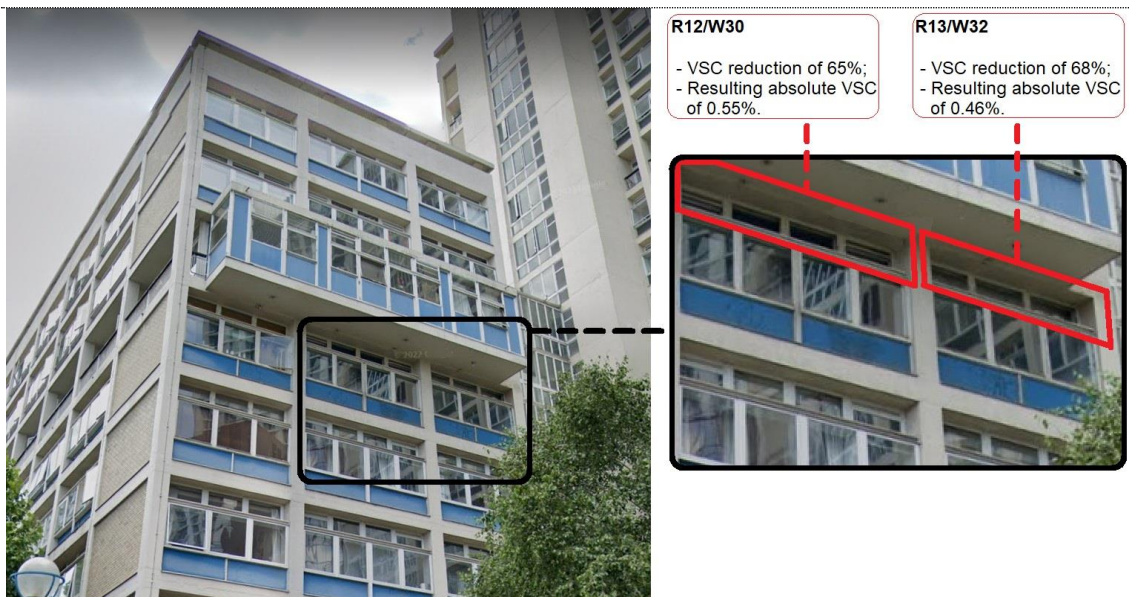
262. The table below summarises the NSL (also known as ‘daylight distribution’) impacts to surrounding properties as a result of the proposed development being built-out in the present day context:

Property	No. windows that would experience a reduction in NSL (as a percentage of the baseline NSL value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
<b>Metro Central Heights</b>				
Total no. habitable rooms tested: 250				
Proposed vs existing	248	2	0	0
<b>6-8 Tiverton Street</b>				
Total no. habitable rooms tested: 4				
Proposed vs existing	4	0	0	0
<b>Stephenson House, Rockingham Estate</b>				
Total no. habitable rooms tested: 85				
Proposed vs existing	79	5	1	0
<b>Rennie House, Rockingham Estate</b>				
Total no. habitable rooms tested: 45				
Proposed vs existing	43	0	0	2
<b>Rankine House, Rockingham Estate</b>				
Total no. habitable rooms tested: 60				
Proposed vs existing	60	0	0	0
<b>Wellesley Court, 15 Rockingham Street</b>				

Total no. habitable rooms tested: 40				
Proposed vs existing	40	0	0	0

*Metro Central Heights*

263. Of the surrounding existing residential buildings, Metro Central Heights contains the greatest number of windows to experience VSC impacts as a result of the proposed development. 39 windows would undergo substantial adverse VSC reductions. It is understood that of these windows, 22 serve studio apartments, 12 serve living/dining rooms and 5 serve bedrooms.
264. Of the substantially adversely affected windows, the two that would undergo the greatest percentage VSC loss would also have the two lowest resulting absolute VSCs. Both are understood to serve a living/dining room. These windows are:
- Window R13/W32 at fifth floor level:
    - VSC reduction of 68%; and
    - Resulting absolute VSC of 0.46%.
  - Window R12/W30 at fifth floor level:
    - VSC reduction of 65%; and
    - Resulting absolute VSC of 0.55%.
265. In both cases, while the substantial percentage loss must be acknowledged, the existing absolute VSC value is very low, being 1.44% at R13/W32 and 1.56% at R12/W30. This low baseline is largely attributable to the host building's design, whereby the windows in question are, firstly, deeply recessed from the host façade, and secondly, located directly beneath a cantilevering storey. This has the effect of restricting the windows' access to daylight. It is also important to note that the windows in question each form part of a two-pane picture window, and as such they are not the only glazed panes serving the host room. This arrangement is depicted in the images below:



*Image 39 (above): Photograph of Metro Central Heights, with magnification of the two windows to undergo the greatest proportional reduction in VSC (edged red), showing their recessed design and the oversail of the cantilevering storey above.*

266. The next three windows to undergo the greatest percentage VSC losses all share the recessed design of R13/W32 and R12/W30, but differ in that they are not located beneath a cantilever. In all three instances, the VSC reduction would be 52%, resulting in absolute VSCs of 5.03%, 5.33% and 5.64%. Like R13/W32 and R12/W30, these glazed panes are not the only aperture providing daylight to the host room, as they each form part of a larger picture window. While it must be recognised that occupiers would experience a noticeable change to daylight levels, the resulting values, although low, are not uncommon for an urban environment.
267. With regard to NSL, the two rooms to experience a minor adverse impact are located on the ground floor. As these rooms look directly towards the vacant application site, they benefit from a largely unobstructed view. Any reasonable redevelopment of the site would, therefore, have an effect on the area of sky visible from this room. In these two cases, the lit area of the rooms would be 63% and 65%, which is not uncommon in an urban location. As such, the occupiers' amenity would not be harmed.

#### 6-8 Tiverton Street

268. 6-8 Tiverton Street is located to the northeast of the site, on the opposite side of the railway line. It is understood that the building contains a residential unit, the habitable rooms within which comprise a living/kitchen/dining space at second floor level and two bedrooms at first floor level. The two windows to experience a minor adverse loss –both serving the living/kitchen/dining space– would retain 0.79% and 0.77% of the existing VSC, only marginally below the BRE recommendation of 0.80%. The living/kitchen/dining space is served by a further three windows that would meet the guidelines.



269. With two windows experiencing a minor VSC adverse loss and none of the rooms experiencing a reduction to NSL beyond the 20% recommended by the BRE, it is considered that the impacts would not be harmful to the occupiers' residential amenity.

Stephenson House, Rockingham Estate

270. This five-storeyed deck-access residential block is located to the east of the application site, on the opposite side of the railway line.

271. Of the 19 windows not meeting the guidelines, 17 would undergo a minor adverse loss of VSC. The vast majority of these losses would occur at windows on ground to third floor level, all of which are located beneath a projecting access deck serving the floor above. Some are also tucked in relatively close to the projecting vertical circulation wing of the building. These building features have a limiting effect on the existing levels of VSC these windows receive, and cause any further losses to generate a significant percentage change that does not necessarily represent how the users of the room would perceive the loss.

272. It is understood that the two windows to experience moderate adverse VSC losses, both of which are at fourth floor level, serve a kitchen and bedroom. The scale of impact would be at the lower end of the 'moderate' adverse range, being a 31% VSC reduction in the case of the kitchen and a 30% VSC reduction in the case of the bedroom. Both windows are set-back beneath deep projecting eaves, which restrict light received from higher altitudes. The impacts on these upper floor windows should therefore be considered as partly consequential of the building's inherent design. While the extent of change generated by the proposed development would be noticeable to the users of this kitchen and bedroom, the two windows would each retain an absolute VSC of over 10.0%, which is considered reasonable given the urban context.

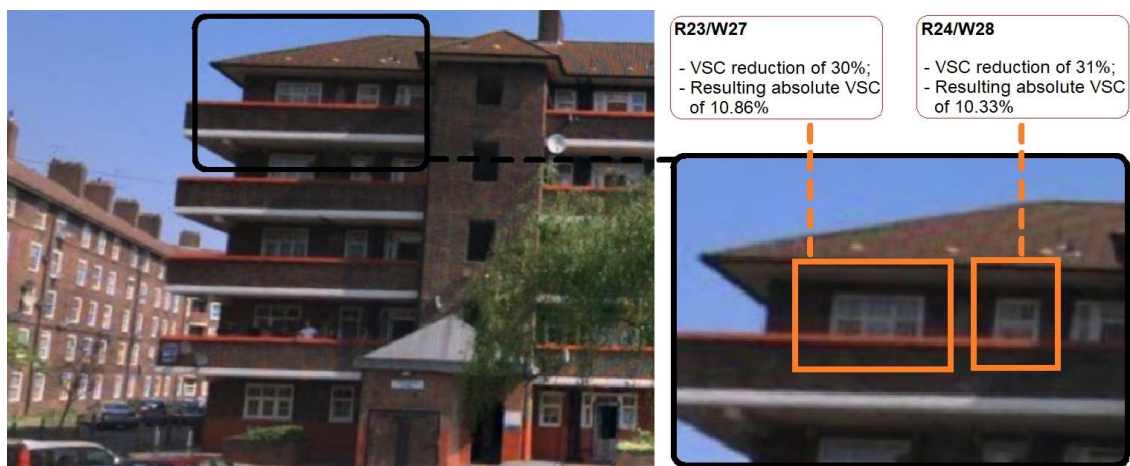


Image 40 (above): Photograph of Stephenson House, with magnification of the two windows to undergo the greatest proportional reduction in VSC (edged orange), showing the deep nature of the eaves and the proximity of the projecting circulation core.

273. With regard to NSL, the five rooms at Stephenson House to undergo a minor

adverse loss comprise four kitchens and one bedroom. All five of these rooms are distributed across the ground to third floors of the building, where the overhanging decks have a limiting effect on sky visibility. Of these five rooms, the room with the lowest resulting NSL would still retain a lit area of 56%. The one moderate adverse loss would be experienced by the same fourth floor kitchen that would undergo the greatest VSC proportional reduction (discussed in an earlier paragraph). However, the proportion of the room that would remain lit is 61%, meaning the space as a whole would not become uncomfortably cold or dark.

Rennie House, Rockingham Estate

274. This five-storeyed deck-access residential block is located southeast of the application site, to the rear of Stephenson House.

275. The six windows at Rennie House to be substantially adversely impacted are understood to serve five bedrooms and one kitchen. The VSC percentage losses would range from 42.0% to 100%. Of the six windows, five are of a matching design and location, being:

- tucked into a corner where the two wings of the building meet; and
- located underneath access decks serving the floor above.

276. As a consequence, these five windows have a very low existing absolute VSC. It is important to consider the loss of VSC in absolute terms for these five rooms – the single greatest loss would be 0.93% and the single smallest loss would be 0.03%. This quantum of light loss is unlikely to be perceptible to the occupiers.



*Image 41 (above): Photo of Rennie House, overlaid with the outlines of three of the five bedroom windows that would experience substantial adverse VSC percentage losses.*

277. The one minor and four moderate adverse losses at Rennie House affect windows that have an existing low level of VSC receipt such that any further reduction, despite not being substantial in absolute terms, produces a significant percentage reduction.

278. With regard to NSL, of the 45 rooms tested, two would experience losses beyond the BRE recommendations, and in both of these instances the extent of loss constitutes a substantial adverse impact. The rooms in question are bedrooms, each located at the intersection of Rennie House's two wings and underneath access decks. The windows have a relatively limited frame of sky visibility due to the obstruction of the deck access walkway, as reflected in their low existing NSL

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levels. Therefore any reasonable development of the land would have a material effect on the portion of sky visible from these rooms.

279. The applicant has also undertaken an alternative analysis without the deck walkways, which shows that all of the windows and rooms assessed would comply with the BRE Report guidelines for daylight amenity. This demonstrates that the deck-access design of Rennie House is the predominant reason for the transgressions.
280. Overall, while the effects on Rennie House are recognised, the VSC and NSL levels of the adversely impacted windows and rooms are significantly constrained by features of the building's own design. On balance, it is not considered that the impact of the proposal would be significantly harmful to the occupants' overall amenity.

*Rankine House, Rockingham Estate*

281. The proposed development would cause nine minor VSC reductions and one substantial VSC reduction at Rankine House, which forms part of the Rockingham Estate to the southeast of the site. Similarly to the other blocks in the estate, Rankine House has a deck-access design and deep overhanging roof eaves.
282. All of the ten adversely affected windows are located either beneath the decks or the eaves. Owing to the windows having low existing VSC levels, the resulting percentage reduction is not an accurate representation of how the change would be perceived by users of the rooms. Taking the example of the one substantially adversely impacted window, its starting absolute VSC is very low at 2.15%, and this would reduce to 1.12% as a result of the proposed development. While the proportional change is marked, experientially the loss of 1.03% VSC from such a low baseline would not be harmful.
283. In summary, because the level of VSC these windows presently receive is low (Rankine House's own design being a causal factor), the substantial adverse VSC percentage losses do not accurately reflect how the change in daylight would be experienced by the occupiers. The fact that there would be no NSL losses in excess of the BRE guidance further testifies to the neighbourly scale of the proposed development. It is considered that there would be no materially harmful impact to the daylight levels and feel of the affected rooms.

*Wellesley Court, 15 Rockingham Street*

284. This seven-storey apartment building is located to the south-east of the application site. The proposed development would cause a minor adverse loss of VSC to five windows, with the percentage reductions ranging from 20% to 26%. The lowest absolute VSC would be 14.74%, which is not uncommon for central London. The other four windows would all retain a VSC above 16.0%. Given that the rooms served by these windows would not experience any NSL loss beyond the recommendations of the BRE, the effects to the daylight level at the Wellesley Court flats would not be harmful to amenity.

## Sunlight

285. The applicant's daylight and sunlight report has assessed the impact of the proposed development on the sunlight received at all windows facing within 90 degrees of due south. The BRE guide states that nearby windows must be assessed using the three-stage process set out below to determine if, as a result of the development, the sunlight levels would reduce to an extent that the room may feel colder and less pleasant.
286. The first stage is to determine if the window would experience:
- a reduction in sunlight to less than 25% Annual Probable Sunlight Hours (APSH); or
  - a reduction in sunlight to less than 5% Winter Probable Sunlight Hours (WPSH); or
  - both of the above.
287. If one of the above criteria is triggered, the next stage is to determine if:
- the window's resulting APSH is less than 0.8 times its former value; or
  - the window's resulting WPSH is less than 0.8 times its former value; or
  - both of the above.
288. Where one of the criteria in Stage 2 is met, the final stage is to determine if the overall loss of sunlight across the whole year would reduce by more than 4% of APSH.
289. The six properties assessed for daylight impacts have also been assessed for sunlight impacts. The table below summarises these:

Property	No. windows that would experience a reduction in sunlight hours			
	No. of windows tested	No. of windows that pass	No. of windows that fail winter	No. of windows that fail annual
<b>Metro Central Heights</b>				
Proposed vs existing	25	25	0	0
<b>6-8 Tiverton Street</b>				
Proposed vs existing	14	11	3	0
<b>Stephenson House, Rockingham Estate</b>				

Proposed vs existing	35	33	2	0
<b>Rennie House, Rockingham Estate</b>				
Proposed vs existing	15	15	0	0
<b>Rankine House, Rockingham Estate</b>				
Proposed vs existing	15	15	0	0
<b>Wellesley Court, 15 Rockingham Street</b>				
Proposed vs existing	13	13	0	0

290. At 6-8 Tiverton Street, the three windows to experience a reduction in APSH in excess of the BRE guidance serve a bedroom and a living room. The number of sunlight hours would be reduced as follows:

- Bedroom window: from 17 as existing to 12 as proposed;
- Living room window #1: from 36 as existing to 21 as proposed; and
- Living room window #2: from 46 as existing to 23 as proposed.

291. By reason of their outlook over the top of the railway viaduct and towards the currently vacant application site beyond, all of these windows benefit from very good sunlight levels at present. Thus, any meaningful development opposite would result in a sizeable loss. Given that all three of these windows would remain WPSH compliant, and while acknowledging that there would be an appreciable change to APSH for the occupiers, on balance the impacts would not be harmful to residential amenity.

292. The one other residential building to experience APSH losses in excess of the BRE guidance is Stephenson House. Here, two windows at fourth floor level would be affected, experiencing the following reduction of sunlight hours:

- Bedroom window: from 30 as existing to 21 as proposed; and
- Kitchen window: from 28 as existing to 20 as proposed.

293. While these reductions, and the impacts they would have on residential amenity, are recognised, the levels of resulting ASPH are not uncommon for central London. When also taking into account that the WPSH of both windows would remain unchanged, the impacts are considered acceptable.

Daylight and sunlight impacts relative to those caused by 19/AP/0750

294. The assessment results show that the effect on neighbouring properties caused by the proposed student housing scheme would be very similar to those

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produced by the previous planning consent for the site, 19/AP/0750. As 19/AP/0750 has recently been implemented, the scheme could be built-out. In determining 22/AP/1068 some weight must be given to the fact that the daylight and sunlight losses produced by the newly-proposed student housing scheme are not substantially greater than those established by 19/AP/0750.

#### Conclusion on daylight and sunlight

295. In total, the development would result in 81 minor, 50 moderate and 46 substantial adverse reductions in VSC for surrounding properties. With respect to NSL, there would be a total of seven minor, one moderate and two substantial reductions for surrounding properties. These exceedances of the BRE guidance, and the negative impact they would have on neighbour amenity, should be given some weight in determining the application.
296. However, when interpreting the daylight losses, regard must be had to the vacant nature of the site, as well as its location within a comparatively more densely-developed environment. Some of the most impacted properties have design features that significantly limit the existing internal light levels, as a result of which any meaningful development on neighbouring land would generate sizeable percentage losses. An alternative 'no balconies' assessment of the three residential blocks on the Rockingham Estate, which was submitted as part of the applicant's daylight and sunlight report, shows that the derogations from the BRE guidance are primarily due to the presence of deck walkways above the windows serving these properties.
297. Sunlight exceedances would be experienced by a small number of windows at 6-8 Tiverton Street and Stephenson House. All of these windows face west or southwest in the general direction of the application site. As such, they are reliant on the openness of the land to achieve these baseline APSH levels, which are relatively high for an urban environment. In turn, this makes the windows more susceptible to change. While the extent of ASPH impact is recognised, it is not considered that the resulting levels would be harmful to amenity.
298. Given the location within the CAZ and Elephant and Castle Opportunity Area, where more intensive development is expected and where the BRE guidelines should be applied flexibly following the design-led approach to density promoted by the London Plan, the impacts are on balance acceptable. As noted above, the BRE guidelines are not mandatory and the advice within the guide should not be seen as an instrument of planning policy. Some of the impacts would go beyond the recommended guidelines but these are not of such significance that it would warrant a reason for refusal of an otherwise acceptable development. Furthermore, the impacts are of a very similar in their extent to those previously deemed acceptable under the implemented permission, 19/AP/0750.

#### Overshadowing

299. No private external amenity areas have been identified that would be significantly overshadowed by the proposed development.

## Privacy

300. Some representations from members of the public have objected to the proposal on the grounds that it would infringe on the privacy of surrounding existing properties.

301. With regard specifically to preventing harmful overlooking of dwellings, the 2015 Technical Update to the Residential Design Standards SPD 2011 requires developments to achieve:

- a distance of 12 metres between windows on a highway-fronting elevation and those opposite at existing buildings; and
- a distance of 21 metres between windows on a rear elevation and those opposite at existing buildings.

302. The plan below shows the façade-to-façade distances between the proposed development and the surrounding existing buildings:



*Image 42 (above): Plan of the proposal in context, showing the separation distances to the surrounding buildings.*

303. All the 'across street' distances between the development and habitable residential rooms opposite would exceed 12 metres, with many being in excess of 21 metres. The closest distances between the proposed development and neighbouring residential buildings are 17 metres (to the Pioneer Building) and 19 metres (to Metro Central Heights), but this would be the closest pinch point of the two buildings and is a corner-to-corner relationship; there would be no directly

facing habitable rooms at these distances. As the 12 metre 'across street' guideline of the Residential Design Standards would be achieved, no privacy infringement issues are raised.

304. The separation distance between the student rooms fronting Tiverton Street and windows opposite at the S.A.H would be approximately 8.5 metres. However, as the S.A.H is in commercial use, and the four windows appear to serve a stairwell, it is not considered that there would be any overlooking issues.
305. The S.A.H is allocated for redevelopment in the Southwark Plan as NSP47 and is expected to deliver approximately 57 new homes alongside at least 2,600 square metres of commercial floorspace and potentially other uses. Due to this potential future residential use of the S.A.H, the applicant has prepared four masterplanning 'options' exploring how the uses and quantum of development might be arranged on the S.A.H site (these are set out in more detail in an earlier part of this report). One of the options includes built form situated along the south-eastern frontage of the S.A.H site, and demonstrates that with a relatively modest set-back from the boundary line a separation distance of 12 metres could be maintained. Any privacy or overlooking concerns for future residents could feasibly be mitigated through the design of the S.A.H proposal, for example through the staggering of windows and/or applying splay restrictions, so that no habitable room windows are directly facing each other. Overall, the separation distance to the S.A.H site is considered acceptable given the urban context, the existing relationship between the sites, and the narrowness of Tiverton Street.
306. It is also relevant that the proposed development is within the same footprint of the previous/implemented permission, 19/AP/0750, in terms of its relationship with Tiverton Street (only extending further to allow for the curved corner). As such, the principle of habitable room windows facing onto Tiverton Street at a distance of 8.5 metres from S.A.H has been established previously, albeit prior to the adoption of the Southwark Plan and the allocations set out therein.

### Outlook and sense of enclosure

307. The site is located within the Major Town Centre, which is characterised by a dense urban grain including a number of existing and consented tall buildings. Although the townscape to the east and southeast of the site is lower-rise with more spaciouly laid out buildings, the site –being on the northwestern side of the railway line– clearly forms part of the more high-rise urban environment of North Elephant. The development would introduce to the site a single tower of a slim profile, designed with rounded corners to reduce its apparent width. The proposal would incorporate high quality materials and low-level green walling, which would have a positive effect on the surrounding properties' outlook. As such, it is not considered that any of the surrounding dwellings that look towards the site would experience a harmfully diminished quality of outlook or sense of openness as a result of the proposed development.



## Management and maintenance of the student housing

308. The Council's 2015 Technical Update to the Residential Design Standards requires student housing proposal to be accompanied by details of the long-term management and maintenance arrangements of the student accommodation, including details of security. This is in the interests of ensuring that, once operational, the development:

- does not generate adverse neighbour amenity or local environmental impacts;
- is managed and maintained to ensure the continued quality of the accommodation, communal facilities and services; and
- will positively integrate into the surrounding communities

309. The applicant has identified the probable operator of the proposal as Homes for Students, who have been involved in the design evolution of the proposal to ensure it is fit for purpose. An application-stage Student Management Plan prepared by Homes for Students has been submitted in support of the planning application, which sets out how the proposed development will be managed and maintained. With regard to the management of the scheme, the Plan makes the following provisions:

- Staffing:
  - a dedicated property manager will lead the management team and be at the building from Monday to Friday during office hours;
  - support staff will include a part-time customer services assistant and maintenance operative, part-time cleaning staff, part-time security and designated student wardens;
  - outside of office hours, there will be on-site resident wardens trained to deal with various situations (security, emergencies, interaction with the helpdesk service etc.);
  - A 24/7 helpdesk service will be available for both tenants and local residents; and
  - mobile security will be provided by a local security company via live CCTV feedback, who will be able to deal with lock outs, additional perimeter patrols and other out-of-office-hours issues.
- Noise and anti-social behaviour:
  - tenancy agreements will include rules and regulations relating to the property, local neighbourhood consideration and enforcement measures;
  - tenants will attend a welcome event at which they will be issued with a customised 'resident handbook'; and
  - tenants will receive an 'on arrival' induction about the rules, regulations and enforcements.
- Community liaison:
  - The on-site team will hold regular meetings with local residents and groups to discuss and address any issues.

- Residents will be able to contact the Property Manager by a number of channels (at the reception, via the 24/7 help desk (which has an escalation mechanism to formal bodies); and
  - a formal complaint and incident procedure to the management company.
- Security
    - CCTV cameras in and around the building will be fed back to the management office to allow monitoring of incidents and potential incidents 24/7;
    - There will also be an electronic access control system to prevent unauthorised access into the building; and
    - The lifts will have access control fitted to restrict use of the lifts to the management team and tenants only.
  - Tenancies
    - Where tenants breach the agreement, there will be escalating levels of enforcement which will include deductions from their deposits, written and final warnings and ultimately expulsions.
310. On account of the above, it is considered that sufficient information has been provided to address the requirements of the SPD, and that a robust framework strategy is in place to ensure the day-to-day operation of the student accommodation would not cause harm to the amenity of surrounding residents. Through a planning obligation, a finalised version of the Student Management Plan will be required prior to occupation of the student accommodation.

### Noise and vibration

#### Plant noise

311. Plant (power, heating and cooling machinery) would be contained within three rooms at basement level and one room at Level 21. Plant would also be located on the roof of the tower, screened behind an acoustic enclosure
312. A condition is recommended requiring the plant not to exceed the background sound level (LA90 15min) at the nearest noise sensitive premises, and for the specific plant sound level to be 10 dB(A) or more below the representative background sound level in that location, all to be calculated fully in accordance with the relevant Building Standard. The condition is considered sufficient to ensure that the proposed plant will not have an unacceptably adverse impact on existing neighbouring residents or the users of the building.

#### Public noise nuisance

313. In terms of public noise nuisance from the development for surrounding residents, a Student Management Plan submitted with the application details how the probable provider, Homes for Students, would operate the accommodation so as to limit sources of human noise disturbance to neighbours.

314. The only other potential source of public noise nuisance is the proposed retail/service/dining unit. Examples include the use of the unit for entertainment or music incidental to the dining function, and the late night serving of food and drink to customers within the external dining areas along the Low Line.
315. In order to limit any risk of public noise nuisance, it is recommended that the following opening hours limitations be imposed on the flexible retail/service/dining use:
- 07:00-23:00 Mondays to Saturdays; and
  - 08:00-22:00 Sundays and Bank Holidays
316. An additional condition restricting the use of the Low Line for outdoor dining to these hours only is recommended:
- 08:00-22:00 Mondays to Saturdays; and
  - 09:00-22:00 Sundays and Bank Holidays

#### Vibration

317. A condition is recommended requiring an assessment of vibration and re-radiated noise to be submitted for the Council's approval following piling but prior to commencement of above-ground construction. The purpose of the assessment is to ensure that the student occupiers would not be exposed to vibration or re-radiated noise in excess of the Council's recommended maximum levels, those 0.13 m/s VDV in the case of vibration during the night-time period, and 35dB LASmax in the case of re-radiated noise.

#### Odour

318. The application is not accompanied by any extraction details. Preserving the architectural integrity of the proposed development --with its appurtenance-free façade, rounded corners and striking form— is considered to be of importance to the success of the development in terms of its townscape role. Thus, it is likely that any scheme of externally-affixed extraction (which would in all probability need to rise up the full profile of the building to terminate at roof level) would militate against an exemplary building design. Accordingly, it is expected that the flexible commercial unit, if used for restaurant/café purposes, would contain re-heat facilities rather than full cooking facilities with extracts/exhausts. A fully internalised extraction system would minimise the risk of odour impacts for the student occupiers above and those residing in surrounding properties.
319. For safeguarding purposes, a condition is recommended requiring details of any extraction and ventilation system to be submitted to the Council for its consideration prior to the installation of any such system.

## Design

320. Paragraph 56 of the NPPF stresses the importance of good design, considering it to be a key aspect of sustainable development. Chapter 12 of the NPPF “Achieving Well Designed Places” is the key national policy for design. In particular para 134 requires development to reflect local and national design policies, guidance and SPDs. It sets out that outstanding or innovative design should be given significant weight in decision making, and requires development that is not well designed to be refused.
321. Chapter 3 of the London Plan deals with design related matters. Policy D3 promotes a design-led approach to making the best use of land. Policies D4 and D8 build on this, setting out the design principles for ensuring new development makes a positive contribution in terms of architecture, public realm, streetscape and cityscape. Policy HC1 advises that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.
322. London Plan Policy D9 is specifically concerned with tall buildings. The policy sets out a list of criteria against which to assess the impact of a proposed tall building – namely locational, visual, functional, environmental and cumulative. London Plan Policy D4 requires all proposals exceeding 30 metres in height to have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny. The proposed building would, at 70.67 metres above ground level, exceed the 30 metre threshold. It thus engages Policy D9.
323. The importance of good design is further reinforced by Policies P13 “Design of Places”, P14 “Design Quality” and P17 “Tall Buildings” of the Southwark Plan. These policies require all new developments to:
- be of appropriate height, scale and mass;
  - respond to and enhance local distinctiveness and architectural character;
  - conserve and enhance the significance of the local historic environment;
  - take account of and improve existing patterns of development and movement, permeability and street widths;
  - ensure that buildings, public spaces and routes are positioned according to their function, importance and use;
  - improve opportunities for sustainable modes of travel by enhancing connections, routes and green infrastructure; and
  - be attractive, safe and fully accessible and inclusive for all.
324. Specifically for tall buildings, Policy P17 requires:
- the location to be within a major town centre, an opportunity area and/or the CAZ, where tall buildings are appropriate;
  - the location to be at an area of landmark significance;
  - proposals to a proportionate height to the location and site;
  - proposals to have a positive impact on the London skyline;

- proposals to respond positively to local character and townscape;
- there to be no harmful impact on strategic views;
- proposals to provide a functional public space; and
- the provision of newly publically accessible space near or at the top of the building where appropriate.

325. It also sets out that the design of tall buildings must:

- be of exemplary design and quality;
- conserve and enhance designated heritage assets and make a positive contribution to the wider townscape;
- avoid harmful environmental impacts;
- maximise energy efficiency; and
- have a positive relationship with the public realm, provide opportunities for new street trees, design lower floors to successfully relate to and create positive pedestrian experience, provide wider footways and accommodate increased footfall.

326. The site benefits from an extant permission (ref. 19/AP/0750), implemented in early 2023, for the construction of a 21 storey commercial building with a basement and the redevelopment of the three railway arches. This is a material consideration when assessing the design quality of the 22/AP/1068 proposal. In particular the height, scale, and form of the 22/AP/1068 proposal are very similar to this consent.

### Site layout, public realm and contribution to the Low Line

327. The principal triangular part of the site would be almost entirely occupied by the ground floor footprint of the building. Internally, the two main spaces would be the student accommodation foyer and the flexible retail/service/dining unit. These would 'wrap' around a centralised sub-station and circulation core. The glazed frontages of both the foyer and the flexible unit would read architecturally as being double-height.

328. To be located along the building's southwestern frontage, the foyer would comprise two parts:

- the main reception/welcome area, to be furnished with seating, which would present glazed frontages partly onto Rockingham Street and partly onto the Low Line; and
- the staffed reception area, demarked by a reception desk, which would present glazed frontages partly onto Rockingham Street and Tiverton Street.

329. By reason of its office-like function, there is a risk that the reception area could fail to provide a suitably active frontage, for instance due to obscuring/privacy treatments being applied to the inner side of the glazing. To guard against this as much as is practicable, a condition is considered necessary prohibiting the application of films/treatments to the glazing. With this condition in place, it is

considered that the foyer would provide a successful wrap-around frontage, helping to activate the public realm and draw passers-by into the Low Line.



Figure 43 (above): View from Rockingham Street of the base of the proposed building, showing the glazed frontage of the foyer.

330. The ground floor of the proposed tower would also incorporate a small room accessed off the reception. With a glazed façade onto Tiverton Street, the room is intended to function as an art/exhibition display window, activating the street and providing interest to passers-by. Although relatively short in length, being 3.25 metres, the art/exhibition display window is a welcome way of dressing what would otherwise be inactive frontage and bringing visual interest to Tiverton Street. A condition is recommended requiring the room to be retained in perpetuity principally for the purposes of displaying art and/or exhibition pieces.

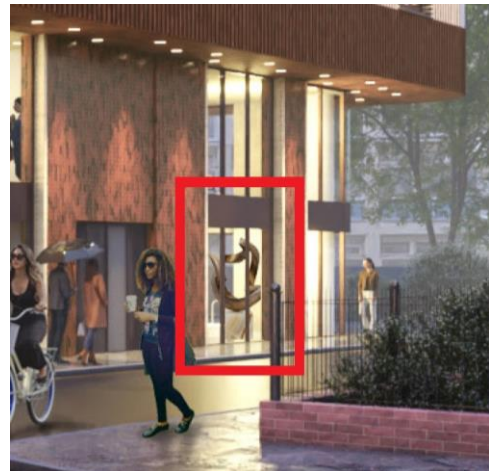


Image 44 (above): View from Tiverton Street, with the display window edged in red

331. With regard to the ground floor back-of-house facilities, these would present short frontages onto Tiverton Street and the Low Line. It is an inevitability of any proposed development that utilitarian functions will occupy a proportion of the ground floor and that, where the site is of a constrained footprint as is the case at 5-9 Rockingham Street, there will be some non-active ground floor frontage. With the extent of non-active frontage amounting to approximately 45% of the building's perimeter, it is considered that the scheme achieves the aims of Policy P14 of the Southwark Plan.

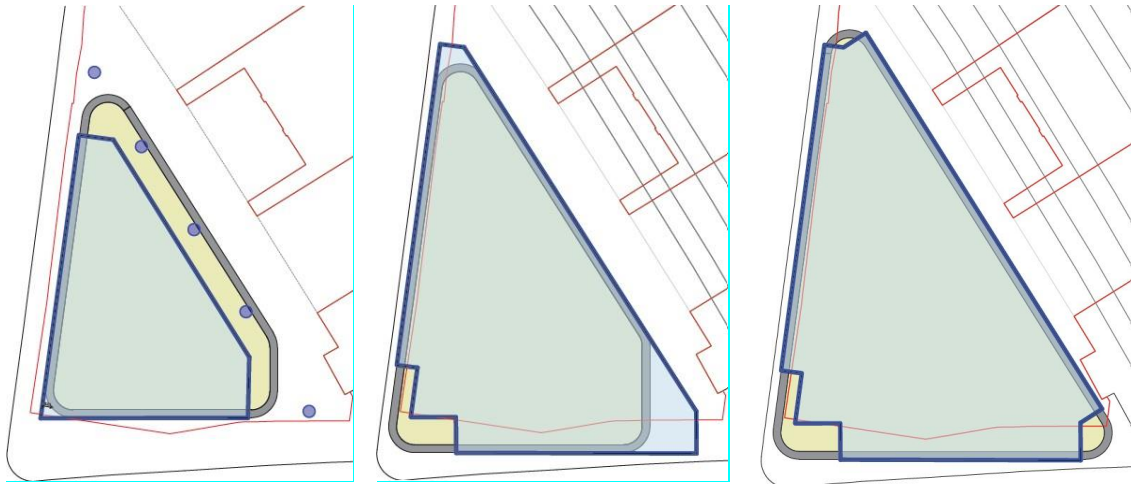


*Image 45 (above): Cropped view of the Tiverton Street elevation, showing the centrally-located stretch of non-active ground floor frontage. This stretch of elevation has been minimised and would very much play a subordinate visual role to the foyer and flexible retail/service/dining unit.*

332. The flexible retail/service/dining unit would comprise two separate parts, each of similar floor area. One part would occupy the northern tip of the tower's footprint, while the other would occupy the middle arch. This two-part arrangement is effective in activating the Low Line. From a practical perspective, the arrangement would lend itself well to one part operating as a café complemented by a bar, servery or kiosk in the other. Alternatively, if a conventional retailer was to take up tenancy, one part could function as the main sales space, with the other being used as a display/show room. The strip of Low Line between the two parts of the flexible commercial unit would accommodate spill-out dining furniture, making for a vibrant and convivial publicly-accessible realm.
333. The proposed building would be cut-back at its base as a compositional device and to provide for a more generous public realm, particularly adjacent to the railway viaduct immediately to the east. The proposal is less generous than the previous/implemented scheme in that, firstly, the passageway between the building and the railway viaduct at ground floor level would be narrower, and secondly, the upper floors of the tower would overhang the passageway comparatively more. However, it would still create an active Low Line with units opening out onto the passageway from both sides. This activity, and the way the two-part unit would 'frame' the walking route is supported. The contribution to the Low Line would be completed by intermittent trellis-mounted greening as well as scheme of lighting to the facades of the arches.
334. In summary, the proposed site layout is well-conceived, opening up the majority of the site's Rockingham Street and Low Line perimeters with new active frontages. The legible entrances of these ground floor uses, and the broader extensive glazed frontage within which they would sit, would bring transparency to the base of the building and revive the railway arches, ultimately making for a positive relationship with the new public realm.

### Height, scale, massing and tall building considerations

335. The overall height, at 70.67 metres above ground level, matches that of the previous/implemented scheme. The footprint of the building is within the consented scheme footprints, with the exception of its corners. The curved massing and brick would produce a softer building profile compared with the sharply rectilinear form of the extant/implemented scheme, providing an opportunity to tie the building's character to the Low Line, the latter being of brick construction and featuring arched openings.



*Figures 46, 47 and 48: Comparison of the footprint of the previous/ implemented scheme with that of the 22/AP/1068 proposal (ground floor is above left, first and second floor is above centre, typical upper floor is above right). The shaped filled and edged in blue is the previous/implemented scheme; the shaped filled in yellow and edged in grey is the 22/AP/1068 proposal.*

336. With regard to policy compliance with London Plan Policy D9 and Southwark Plan Policy P17, the following aspects are of consideration:

#### Landscape contribution

337. The development includes additional public open space on-site and a number of significant improvements to the public realm locally. These are considered to be commensurate with the scale of development.

#### Point of landmark significance

338. The site, being close to the town centre of Elephant and Castle, which includes a public transport interchange, education facilities and a retail centre, is considered to be within an area of landscape significance. While the site's landmark significance is not of the same order as the sites on the main transport routes into the centre and within Elephant Park, the site has some significance as a result of its situation within the Opportunity Area and Major Town Centre, and would help manage the transition in scale from the taller buildings in the centre stepping down towards the lower scale residential environments to the south and southeast. The site location, on the fringes of this major town centre, has informed the height and scale of the building. The height of the building is considered appropriate for this area.



Highest architectural standard

339. The proposed building would be a high quality new-build scheme, incorporating a pallet of robust and rich facing materials, brought together into a refined and striking architecture through careful detailing. It would deliver high-performance student housing and commercial floorspace. The scheme is designed to achieve an excellent BREEAM rating. The architecture itself is well considered.

Relates well to its surroundings

340. At ground floor level –where large framed glazing and principal entrances to the student accommodation and flexible retail/service/dining unit are proposed– the scheme would concentrate the active frontage and main entrances along the key public spaces. The scheme would also unlock part of the Low Line, helping create a more direct north-south link from Newington Causeway to the Rockingham Street arches and Elephant Park beyond.

Positive contribution to the London skyline

341. The building would form part of the context of large-scale buildings within Elephant and Castle Major Town Centre, standing adjacent to and consolidating the cluster of existing tall structures in North Elephant. The cumulative impact has been assessed as part of the applicant’s HTVIA which includes consideration of the proposed development within the cumulative context of existing proposed future developments and planning consents. The HTVIA demonstrates that the scale, form and massing of the development would be congruent to the existing and emerging context. By reason of its elegant profile, curved massing and engaging architectural treatment, the building’s skyline contribution would be positive.

Free-to-enter publicly-accessible areas

342. Accessible public space at the top of the building, as is required by Policy P17 of the Southwark Plan, would not be provided by the proposal. In this instance, it is not considered reasonable to require the applicant to provide high-level publicly-accessible facilities because the proposal does not occupy a site and would not be of a height in the context of the Elephant and Castle Opportunity Area that would make it appropriate for such a function. Furthermore, given the modest footprint of the site, delivering the amenities necessary to support public access to a high-level space (such as a waiting area, lift core and toilets) would be challenging in a practical sense as well as prohibitive to delivering a viable quantum of floorspace internally.
343. The proposal would deliver public realm at the base of the building, as well as the Low Line route. The latter should be considered as a significant benefit of the scheme. In light of this, and given the modest footprint of the site, the total quantum of new publicly accessible realm created by the redevelopment would be commensurate to the height of the proposed tall building.

### Conclusion on massing, height, scale and tall building considerations

344. Overall and having taken account of the effects arising cumulatively with other existing, consented and planned tall buildings nearby, the development's design meets the policy criteria for a new tall building. However, a significant outcome of a tall building is its visibility and while this is not harmful in itself, the potential effects on the 'receptor' townscape and heritage assets are of special concern.
345. In compliance with the requirements of London Plan Policy D4, the proposals were subject to a multiple-stage design scrutiny process from planning, urban design and conservation officers. This scrutiny process ran throughout the pre-application phase and the planning application stage. Examples of how the scheme's design was positively progressed through collaboration with officers include:
- changes to the appearance of the building's crown and base;
  - the omission of a column from the public realm;
  - the optimisation of activity within the arches;
  - the reconfiguration of the internal layouts to provide single studio wheelchair units; and
  - the integration of a second stair core for fire safety purposes.
346. It was ultimately decided that, given the previous/implemented consent on the site, and that the proposed development was largely within these parameters, it was not necessary for the scheme to be fully reviewed by the Council's independent Design Review Panel. Officers are satisfied that the requirements of Policy D4 have been met.

### Architectural design and treatment

347. The proposed tower's rounded form would be articulated through the predominant material treatment, a mix of rich red bricks. The red tone would be contrasted by occasional white gloss elements, in the form of string courses on the lower floors and dressings to openings. Articulation would be brought with different bond styles and horizontal bands created from vertically-stacked projecting brick. On the top two floors, spandrels treated in white are proposed, together with a slightly larger final horizontal band to create a delicately accentuated crown. The building would terminate cleanly, with a non-stepped parapet line. While differing from the neighbouring tall buildings in that it would not possess a strongly rectilinear or sharp-edged form, the proposal would



have a distinctive identity within the North Elephant neighbourhood without appearing discordant among the nearby tall buildings.

*Image 49 (above): Visualisation of proposal, looking north from outside Metro Central Heights*

348. To ensure the texture and interest of the elevational designs are carried through to the as-built scheme, conditions are recommended requiring sample panels of each brick and brick banding with bond and mortar, as well as samples of the window and door frames.
349. With regard to the railway arches, the coppery-brown framing to be installed, which would feature central banding and upper vertical glazing, would be successful in providing simple divisions while allowing the original form of the arches to remain part of the experience of the Low Line. The northern arch and part of the southern arch would not incorporate glazing at ground floor; instead decorative lattice-style panelling is proposed. On the northern arch, this would be complemented by a scheme of integrated lighting. High-level projecting illuminated signage, to be affixed to the viaduct façade, is also proposed, which would help contribute to the character of this stretch of the Low Line during the evening and night-time. Details of the decorative lattice-style panelling and the scheme of lighting will be secured by obligation.



*Image 50 (above): Elevation of the northern arch, showing indicatively how a scheme of lighting could be applied to the panelling.*



*Image 51 (above): The middle and southern arches, showing indicative illuminated signage.*

350. Overall, the proposal would achieve an exemplary quality of architectural design.

### Heritage and townscape impact

351. The adjacent Metro Central Heights is a grade II listed building. Its significance is a purpose-built office block built in a brutalist style by the notable architect Erno Goldfinger. Its setting, an urban and vibrant one at the heart of Elephant and Castle, has changed since its construction and now includes tall buildings. However, this changeable highly urban and metropolitan setting remains a contributor to the experience of the asset.

352. Turning to the proposals, the scheme, and the previous/implemented scheme, would add to this highly urban environment. The height and scale of the building would not compete with the overall experience of Metro Central Heights which would remain visible as a series of blocks from key viewpoints at the Elephant and Castle and from the north. The scheme would block some close views of the asset, but these are not the principal experiences of the cluster of blocks of Metro Central Heights, and therefore have limited impact on the building's significance. Overall, the significance of Metro Central Heights would not be harmed by development within its setting, as proposed in this application.

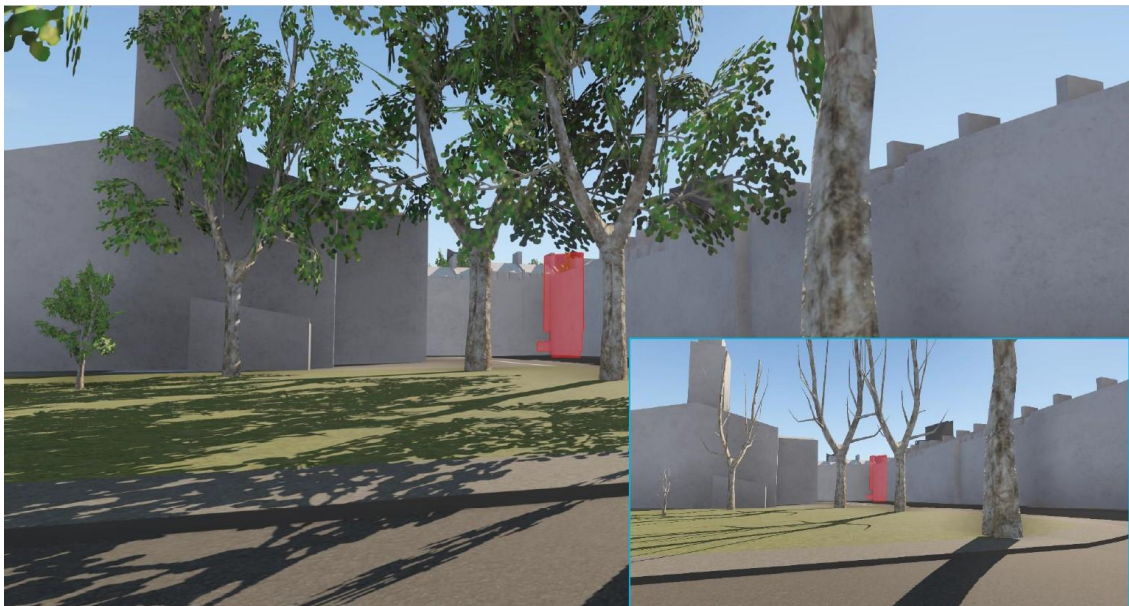


*Image 52 (above): View from outside Elephant and Castle underground station entrance, looking northeast towards Metro Central Heights, with the outline of the proposed development indicated by the yellow line.*

353. The Michael Faraday Memorial is located approximately 190 metres south west of the centre of the site and was statutory listed at Grade II in 1996. The significance of the structure is derived from its architectural quality, being an early British example of the use of stainless steel as a cladding skin. The building is a good example of post-war development. However, there is limited intervisibility between the two, and while there would be an impact on the overall experience of the asset, with the proposed development being part of the cluster of tall buildings within Elephant and Castle, there would be no harm to the significance of the building.
354. The Inner London Sessions Court was statutory listed at Grade II in 1998. The public building was constructed between 1914 and 1921, to the designs of LCC architect W. E. Riley in a 'restrained classical' style. Historically there has been a judicial building on the site since 1794, when the Surrey County Sessions House designed by George Gwilt was erected. Since development of the present building, the court has seen piecemeal changes over the years, having been extended in 1954-58 and subsequently in 1967-9. The experience of this building is largely from Newington Causeway. There is a different character north of the

viaduct and the set back of the building helps to minimise the impact on the significance of the asset within the kinetic experience, as the proposal would be viewed within the wider context of other highly urban buildings including Eileen House and the Elephant and Castle Shopping Centre development.

355. With regard to the visibility and impact of the development on Trinity Church Square Conservation Area, the church and the terraces of listed buildings to the west and south of the square, in the majority of views there would be no impact on the significance of these buildings because the proposal would not protrude above the terraced properties' roof line.
356. The only viewpoint identified where the tower would be visible is in Viewpoint 1 of the applicant's HTVIA addendum. Viewpoint 1 is taken from the northern edge of the square, opposite the church, looking southwest. Here the very top of the development would be marginally visible in glimpses over the roofs; however, the roof lines, facades and collective characteristics would remain the prominent features in the experience of the terraces and square as a designated heritage asset. With the cumulative effect of the already approved and as built towers of Elephant and Castle also appreciable in this view, the proposed development would not feature conspicuously.



*Image 53 (above): A chalked view (Viewpoint 1), looking southwest across Trinity Church Square, with the massing of the proposed tower depicted in red, showing its marginal breach of the terraced properties' roofline. Summertime is shown in the main image, wintertime in the inset.*

357. On balance, having regard to the advice in Historic England's guidance "The setting of heritage assets", the proposals would have a neutral impact on the significance of the conservation area and groups of terraces in Trinity Church Square, and the church itself. In this respect, the development would comply with P19 (Listed Buildings) and P20 (Conservation Areas) of the Southwark Plan.

### Inclusive access

358. Policy D3 of the London Plan states that measures to design out crime should be integral to development proposals and be considered early in the design process. Developments should ensure good natural surveillance, clear sight lines, appropriate lighting, and logical and well-used routes. Policy P16 of the Southwark Plan reinforces this and states that development must provide clear and uniform signage that helps people wayfind and effective street lighting to illuminate the public realm.

359. The various inclusive access measures within the proposal would include:

- all surfaces at a gentle gradient and surfaced in slip-resistant treatments;
- all uses to have step-free access through the provision of ramped or lift arrangements;
- cycle storage provision to allow for larger cycles such as cargo cycles, purpose built cycles for disabled people and tricycles; and
- signage to be clear, legible and consistent.

360. The proposal is ambitious in its inclusive design principles creating a convenient and welcoming building and new public spaces that can be entered, used and exited safely, easily and with dignity for all.

### Designing-out crime

361. Policy D11 of the London Plan and Policy P16 of the Southwark Plan require development proposals to reduce opportunities for crime and create and maintain safe internal and external environments.

362. Mentioned throughout the application documents are the various ways in which opportunities for crime have been designed-out. Examples include:

- creating well lit routes with good sight lines, creating opportunities for natural surveillance in so doing;
- designing-out alcoves, secluded areas and other spaces for anti-social behaviour;
- installing CCTV and intruder detection systems within the building, and of the cycle store room accessed off the Low Line; and
- designing the cycle store room to be open-plan, well-surveilled and secure.

363. The Metropolitan Police's Secure by Design Officer has assessed the proposal and is confident that certification can be attained. To ensure certification is ultimately achieved, the imposition of a two-part 'Secured by Design' condition is recommended.

### Conclusion on design

364. This is a carefully conceived scheme which would provide an engaging building of an appropriately urban character. With its curved corners providing a sculptural

quality, the proposed massing adeptly provides a soft yet striking form. To an extent, the curvature also helps to visually soften the impact of the deep cantilevering floors.

365. The height of the proposal has been the focus of a number of the objections to this application. The previous/implemented planning permission, 19/AP/0750, is important in this regard as it establishes in principle the acceptability of a building of the same envelope in design terms. Moreover, the application site is situated within an opportunity area with excellent public transport accessibility and a location where tall buildings are considered to be appropriate. With the height of the proposal not exceeding that of the previous/implemented permission, and having been carefully tested in the townscape views, it is concluded that it would neither appear overly dominant nor harm important aspects of the local townscape character. It would achieve high quality architecture and relate well to surroundings at the ground floor level. Overall, the height, scale and massing of the proposed building can be accommodated without undue harm to the established townscape.
366. In terms of architectural treatment, the proposed deep red brick mix contrasted by five bands of lighter brick (three at the base and two on the uppermost storeys), would bring a clear 'base, middle and top' hierarchy to the building. Window openings would be imbued with depth by the full brick white gloss reveals. The bespoke openable patterned grilles to the side of windows would bring further finesse to the facades. Throughout, robust and high quality finishes are proposed. Sample materials and mock panels to ensure high quality execution will be required by condition.
367. Having applied the statutory tests as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 and the requirements of the NPPF, it is considered that the proposal would conserve and enhance the significance of designated heritage assets and would make a positive contribution to the wider townscape character. The proposed development would also make efficient use of land and optimise density, in accordance with NPPF paragraphs 122 and 123, London Plan Policies GG2 and Policy D3 and Southwark Plan Policy P18.
368. Inclusive design and crime minimisation considerations have all been resolved to an acceptable level of detail.
369. For the reasons given above, it is considered that an acceptable quality of design would be achieved.

### **Public realm, landscaping and trees**

370. London Plan Policy G7 and Southwark Plan Policy P61 recognise the importance of retaining and planting new trees wherever possible within new developments. London Plan Policy G5 requires major development proposals 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.

## Public realm

371. In terms of the proposal's hard landscaping offer, small areas of extended footway around the base of the building would be delivered, all of which would be finished in materials consistent with the adopted footway so that the ownership line would be imperceptible.
372. The main public realm contribution, however, would be the provision of the Low Line route along the building's eastern edge. This would be a 3.2 metre wide passageway, with a centralised strip of minimum width 1.5 metres dedicated for pedestrian circulation and clear of tables and chairs. The strips where dining furniture can be placed would be laid in slightly wider sand / seed joints to allow plants to naturally grow between pavers, helping to soften the environment. The alignment and width of the passageway would also be sufficient to meet the maintenance access needs of Network Rail in respect of the adjacent railway line.



*Figure 54 (above): Proposed ground plan showing the extent of the designated outdoor dining zone within the Low Line in green.*

373. The minimum 1.5 metre wide route through the passageway to be clear of dining furniture has been demarcated on a ground floor plan submitted with the application, and a condition is recommended to ensure compliance with this throughout the lifetime of the development.

## Landscaping

374. The application site is constrained in its ability to optimise planting because, due to the active adjacent railway line, Network Rail has a 10 foot covenant zone from the viaduct façade into the site. Network Rail is entitled to clear access in this zone whenever they need to maintain the viaduct. For this reason, any planting within this zone needs to be removable.
375. Soft landscaping would be limited to planters within the Low Line which would support climbers on trellising. Through planning conditions, the applicant will be required to install the planter- and trellis-mounted greening to the agreed specification and maintain it in the long-term. Its enduring positive contribution to the greening of the site and the adjacent pocket park can, therefore, be assured.
376. Climbing plants would also be provided at roof top level on the plant screen. Although these would not provide visual landscaping benefit within the public



realm, they would contribute to the Urban Greening Factor (described in more detail in a later section of this report).

## Trees

377. There are presently no trees on the site. The application does not propose to introduce any new trees, given the lack of space available within the relatively modest site boundary for accommodating specimens that could grow to a reasonable degree of maturity. The on-site greening and is considered adequate such that the non-provision of new tree planting is acceptable.

## Conclusion on public realm, landscaping and trees

378. The scheme would deliver a high quality public realm, enlarging the footway along Rockingham Street and unlocking part of the Low Line walking route. These hard surfaced areas would be complemented by appropriate soft landscaping. Given the constrained nature of the site and the need to accommodate the access requirements of Network Rail to the viaduct, the landscaping proposals are considered acceptable.

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

379. Policy G5 of the London Plan states that urban greening should be a fundamental element of site and building design. It requires major developments that are predominantly residential to achieve an Urban Greening Factor (UGF) score of 0.4 and those that are predominantly commercial to achieve a score of 0.3. The scheme proposed by 22/AP/1068 falls within the latter category.
380. The protection and enhancement of opportunities for biodiversity is a material planning consideration. London Plan Policy G6 requires development proposals to manage impacts on biodiversity and secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. Southwark Plan Policy P60 seeks to enhance populations of protected species and increase biodiversity net gains by requiring developments to include features such as green and brown roofs, green walls, soft landscaping and nest boxes.

## Urban greening

381. The proposal would achieve a UGF score of 0.18 through a combination of:
- 77.2 square metres of ground level climbing plants;
  - 90.4 square metres of roof-level climbing plants; and
  - 13 square metres of greenery behind the northern arch; and
  - 39.1 square metres of extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket).
382. This is deemed to be the maximum achievable UGF score given the following constraints:

- the small site area;
- requirements to maximise functional pedestrian / maintenance uses through use of hard surfaces;
- soil conditions result in poor drainage at ground floor and prevent rain gardens;
- roof areas have been maximised for use of services equipment to deliver the required Energy Strategy, resulting in no possibility of green/brown roofs on the tower top; and
- a large area of the site sits underneath the railway and offers no possibility of greening.

383. The score of 0.18 is a considerable shortfall on the minimum policy requirement of 0.4. While the applicant has demonstrated that all opportunities for optimising greening have been exhausted, the performance should nevertheless be treated as a deficit of the scheme. However, when balanced against the various benefits of the proposal, one of which is the overall high quality of the public realm, this matter alone is not considered sufficient to warrant refusal of planning permission.

### Ecology

384. The applicant's Ecological Appraisal notes that the site comprises mainly hardstanding, with a small area of introduced shrub and ephemeral / short perennial vegetation. Finding that habitats on-site are common and widespread and of low or negligible ecological importance, the Appraisal concludes that no impacts to designated habitats or priority habitats will occur as a consequence of the proposed redevelopment.

385. With regard to bats, through a targeted desk study data search, the closest record was 0.3 kilometres from the site and for a pipistrelle bat; no records were found within the site boundary. The site also has low potential to support nesting and foraging invertebrate and bird species. Therefore, the report concludes that impacts on any of these species' groups are considered low or negligible.

### Biodiversity

386. The applicant's Biodiversity Net Gain Assessment found the site to have a baseline score of 0.034. The proposal would deliver biodiversity gain through the climbing planter boxes on the ground floor and roof top, and planting on the northern façade of the northern railway archway. As a consequence, the site's score would rise to 0.0437, exceeding the target score of 0.0374 and representing a betterment of 28.51%.

### Conclusion on urban greening, ecology and biodiversity

387. The Council's Ecologist and Urban Forester have reviewed the application information and deemed the proposal to be satisfactory. The Ecologist welcomed the biodiversity net gain of 28.51% and provision of urban greening,

recommending conditions to secure the provision of 12 Swift bricks and six bat tubes within the building fabric to support local biodiversity. A two-part condition will be imposed at the request of the Urban Forester to ensure the development is built-out to achieve the 0.18 UGF score.

## Archaeology

388. The site is located within the 'North Southwark and Roman Roads' Archaeological Priority Area. The Council's archaeologist has considered the proposal. They noted that the desk-based assessment submitted with the application reports on earlier phases of fieldwork that have been undertaken on site. This has largely been geoarchaeological research, related to understanding the formation of the Rockingham Anomaly and its relationship to historic and archaeological land use within the area. The applicant has agreed to a number of conditions recommended by the Council's archaeologist to adequately secure the archaeological interests of the site.

## Transport and highways

### Trip generation

389. Policy T4 of the London Plan requires development proposals to ensure the impacts on the capacity of the transport network are fully assessed and that any adverse impacts are mitigated. Policies P45, P49 and P50 of the Southwark Plan require developments to minimise the demand for private car journeys and demonstrate the public transport network has sufficient capacity to support any increase in the number of journeys by the users of the development.
390. Given the lack of on-site parking along with the various public transport options in the area, cycle links and cycle parking, the trips associated with the proposed student accommodation and retail use would predominantly be by sustainable travel modes including on public transport, by bicycle and on foot. The Council's Transport Policy Team predicts the proposed development would generate public transport trips as follows:
- 26 two-way public transport trips in the AM peak hour; and
  - 37 two-way public transport trips in the PM peak hour.
391. These numbers are similar to those predicted by the applicant's consultant. These are relatively high trip numbers. The Transport Policy Team is comfortable that these trip numbers would not have any noticeable adverse impact on the local highway network due to the initiatives proposed in the Travel Plan; these include the appointment of a dedicated Student Travel Plan Coordinator, the provision of cycling facilities, furnishing users of the development with travel information, and offering cycle training courses. However, as there would be a public transport capacity impact, a contribution of £135,000 towards local bus service investment has been requested to ensure the network is commensurately resourced to accommodate the extra passengers, which the applicant has agreed to.

392. It is also relevant to consider the forecasted trip generation for the proposed development in comparison to that of the previous/implemented office-led planning permission: there would be over 100 fewer trips during the AM and PM peak hours. This lower trip generation would, comparatively, have a positive impact on the surrounding transport network and would reduce the demand on public transport during the AM and PM peak hours.
393. A Final Travel Plan and Transport Methods Survey is to be secured by condition to ensure the measures outlined in the draft document are implemented and promoted.

### Student move-ins and move-outs

394. Students moving in and out of PBSA can generate a significant demand for loading space nearby. To ensure these impacts are minimised, the procedure for managing student arrival and departure periods at the start and end of term will be set out within the Final Student Management Plan to be secured by obligation, and this will be expected to align with the principles in the application-stage documents. The key elements proposed at this stage within respect to move-ins are:
- the process will be spread over two weekends each academic year;
  - the allocated drop-off point would be the single yellow line stretch of Tiverton Street adjacent to the site;
  - to stagger arrivals, each student will be advised of a date and time to take up occupancy of their room, and each move-in slot will be limited to 30 minutes;
  - during move-in days there will be an increased on-site management presence, partly to enforce booking appointment times, and partly to assist with the unloading process; and
  - students will be sent a supporting information pack relating to nearby unloading positions and public transport routes.
395. Members of the public have objected on the grounds that the Transport Assessment has not accounted for instances of move-ins outside of the two September weekends each academic year. It is considered that move-ins either side of this two week period would be sufficiently low, and that these would to some extent be managed by the CPZ in operation in this location, such that no harm would be caused to the local highway network or surrounding residential amenity.
396. Members of the public have objected to the Transport Assessment not committing to any measures during the move-out period. However, as students tend to finish courses and occupation at different times over the summer, and by reason of the site's PTAL 6 location where a CPZ is in place, there are unlikely to be any significant highway or amenity impacts. The operator has offered to review the move-out process when preparing the Final Student Management Plan, and if deemed necessary will utilise a similar approach to the move-in managed process. The proposed obligation relating to the Final Student

Management Plan will be worded to expressly require inclusion of measures in respect of the move-out period.

### Servicing and deliveries

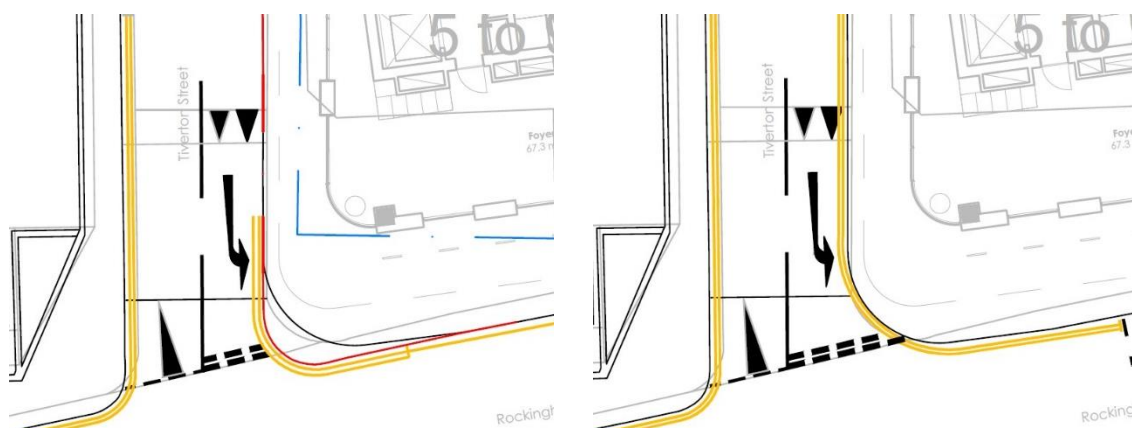
397. London Plan Policy T7 deals with servicing and delivery arrangements during construction and end use. With respect to end use, the policy requires provision of adequate space for servicing, storage and deliveries to be made off-street, with on-street loading bays only used where this is not possible.

#### Servicing/delivery trip generation

398. The applicant's Transport Assessment predicts on a daily basis approximately 20 deliveries to the student housing and 2 to the flexible commercial unit, with potential for up to 5 deliveries in the peak hour. The Council's Transport Policy Team agrees that these estimates are realistic, and is of the view that these numbers would neither place undue strain on the highway network nor impact upon the amenity of nearby residential occupiers.

#### Servicing/delivery facilities

399. Owing to the one-way arrangements locally, vehicles would approach the site southbound along Tiverton Street. The proposed development would be serviced from the single yellow line stretch of Tiverton Street flanking the site along its northwestern boundary. This arrangement is the same as that approved under the previous/implemented permission, 19/AP/0750.
400. Assuming a maximum loading duration of 20 minutes per delivery, the proposed area on Tiverton Street would, at 12 metres in length, be able to accommodate simultaneous deliveries. It would also be of a sufficient size to accommodate the maximum forecasted servicing demand. The Site Management Team (or equivalent) would be responsible for overseeing servicing and delivery operations at the development.
401. As part of the servicing and delivery strategy, amendments are proposed to the junction of Rockingham Street and Tiverton Street to match those consented under the previous/implemented permission.

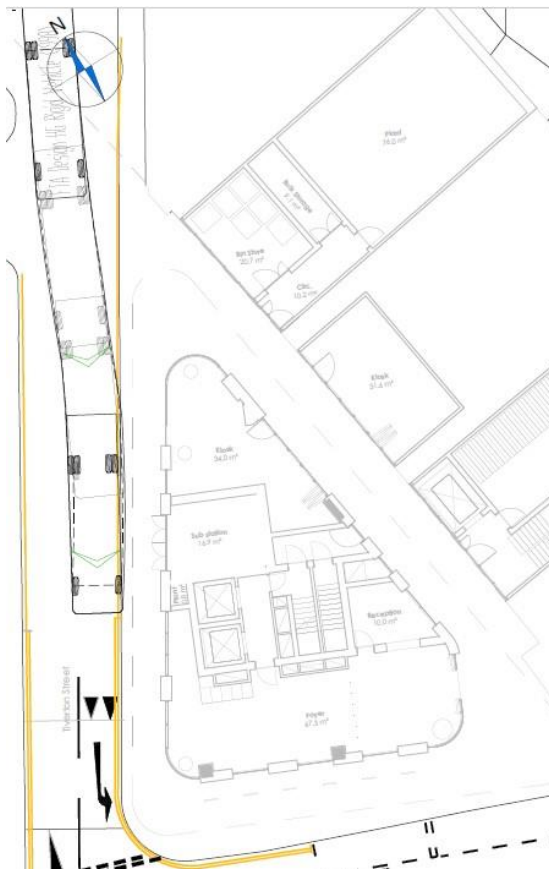


*Image 55 (above): Existing highway arrangement at the junction of Tiverton and Rockingham Streets.*

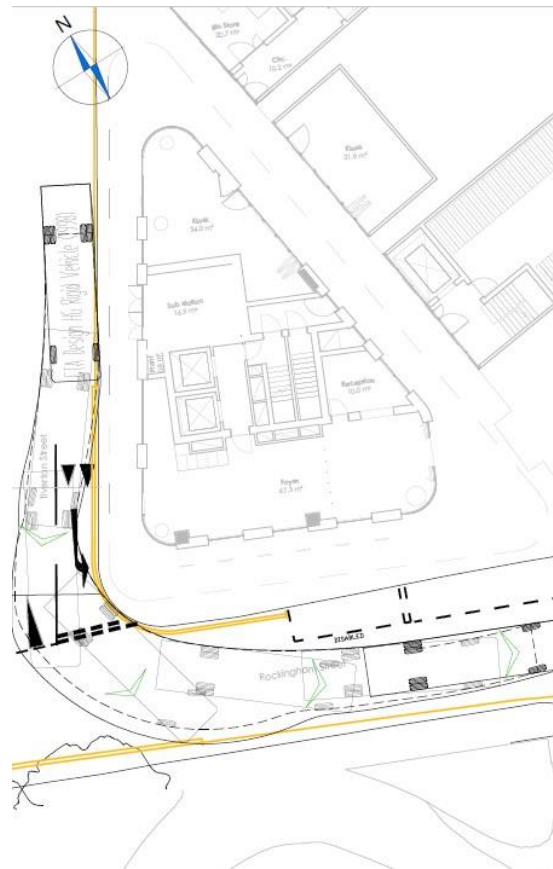
*Image 56 (above): Proposed highway arrangement at the junction of Tiverton and Rockingham Streets.*

402. The highway reconfiguration, involving an expansion to the bellmouth as depicted in the image above right, would enable a 10 metre rigid vehicle travelling southbound along Tiverton Street towards the site to:

- manoeuvre around the on-street parking spaces on the stretch of Tiverton Street beneath the railway arches; then
- pull up along the single yellow line stretch to unload; and then
- depart the site making a left-turn into Rockingham Street without overrunning the kerb or any of the three (one new, two relocated) disabled parking spaces.



*Image 57 (above): Tracking diagram of a rigid vehicle negotiating the parking spaces under the arch in order to pull up on the stretch of single yellow line.*



*Image 58 (above): Tracking diagram of the left-turn manoeuvre made by a rigid vehicle from Tiverton Street into Rockingham Street.*

403. This junction redesign is welcome, and is to be secured by way of a Section 278 Agreement.

#### Servicing/delivery hours

404. Servicing hours to all of the uses would be restricted by condition, as follows:

- 09:00 to 20:00 on Monday to Fridays;
- 09:00 to 18:00 on Saturdays; and
- 10:00 to 16:00 on Sundays.

#### Conclusion on servicing/deliveries

405. The proposed servicing arrangements, with appropriate routing of inbound and outbound vehicles, as well as limitations on delivery hours, are supported by the Council's Transport Policy and Highways Development Management Teams.
406. The submission and approval of a standalone Final Delivery and Servicing Management Plan (DSP) is to be required by condition. This should be based on the principles established by the outline version submitted with the application, and the operation of the building thereafter will need to be in accordance with the approved Final DSP. As a precautionary measure, a Delivery and Servicing Management Bond will be secured so that adherence to the Final DSP and highways impacts can be monitored over the course of the first two years of operation.

#### Refuse storage arrangements

407. To store the combined volumes of refuse produced by the proposed uses, a dedicated facility is proposed within the northernmost arch. Waste would be collected daily by a private contractor. The proposed refuse storage has a built-in capacity for 2 days' worth of waste should a collection day be missed. Plans have been provided demonstrating that the refuse store has been sized to accommodate the refuse receptacles necessary to meet the volumes of waste generated by the student accommodation and flexible commercial unit, with sufficient manoeuvring and circulation space factored-in.





Image 59 (above): Refuse strategy

Image 60 (above): Bulk waste strategy

408. The Final DSP, to be required by condition, will secure the finalised refuse details including the collection arrangements.

### Car parking

409. Policy T6 “Car Parking” of the London Plan requires developments in locations with existing and future high public transport accessibility to be car-free, save for adequate parking for disabled people. Specific requirements for different uses are set out in Policy T6.1 through to Policy T6.4, while Policy T6.5 deals with non-residential disabled persons parking.
410. Southwark Plan Policy P54 “Car Parking” echoes the London Plan, promoting car-free development in zones with good public transport accessibility. It requires car-free non-residential proposals in CAZ locations, and for any disabled parking to be provided on-site and supported by EVCPs.

### Disabled car parking provision

411. Containing 244 student bedspaces (the equivalent of 97.6 single homes), this development would be expected to provide three disabled parking spaces on site applying the London Plan standards.
412. The Southwark Plan requires a maximum of one car parking space per wheelchair accessible unit (which for this application would equate to a maximum of 13), depending on:
- the anticipated demand for parking spaces,
  - the tenure of the development;
  - The quality and accessibility of the local public transport network; and
  - the access to local amenities.

413. The proposed development would be car free except for one disabled parking space, which would be provided on-highway on Rockingham Street. The applicant has put forward the following argument in favour of this provision:

*“An assessment of disabled parking demand from student accommodation in London has been undertaken based on information provided by the University of the Arts (UAL). The data indicates that of the current 3,600 students living in UAL halls of residence, none are in the ownership of a blue badge permit. Therefore, there is an argument to provide no, or a reduced provision of, disabled parking when compared with the London Plan (2021)”.*

414. Given the site’s location and high PTAL rating, and taking into account the other factors as set out above, on balance this is an acceptable approach. An electric



vehicle charging point should be provided for the disabled parking space, and this will be required by condition.

#### Reducing car usage and rationalising on-street parking provision

415. Some respondents to the public consultation have noted that the Transport Assessment does not consider potential car use by students. The Controlled Parking Zone (CPZ) in place in this location provides adequate daytime parking control against on-street parking. Through an obligation in the Section 106 Agreement, all residents of the proposed development would be exempted from applying for parking permits.
416. As part of the Section 278 works, the applicant has agreed to relocate the existing parking spaces on the south-western side of Rockingham Street so that they are consolidated with one proposed space on the northeastern side of the highway. This is in the interests of pedestrian safety. Clustering the spaces in this way will also potentially allow for optimised use of the electric vehicle charging point.

#### Cycle parking

417. London Plan Policy T5 “Cycling” sets minimum cycle parking standards for different uses. Southwark Plan Policy P53 “Cycling” sets out a higher requirement than the London Plan standards.
418. The table below summarises the minimum cycle parking required by the Southwark Plan and London Plan, alongside the provision proposed by this application:

<b><u>Cycle parking minimum policy requirements vs provision</u></b>						
<b><u>Land use</u></b>	<b><u>Long-stay spaces</u></b>			<b><u>Short-stay spaces</u></b>		
	<b>Requirement</b>		<b>Provision</b>	<b>Requirement</b>		<b>Provision</b>
	<b>SP '22</b>	<b>LP '21</b>		<b>SP '22</b>	<b>LP '21</b>	
Student housing	244	183	204	25	7	12
Retail	2	0	0	4	4	
<b>Total</b>	<b>246</b>	<b>183</b>	<b>204</b>	<b>29</b>	<b>11</b>	<b>12</b>

#### Long-stay cycle parking

419. As the table above shows, the proposal would exceed the minimum London Plan requirement of 183 long-stay spaces. In total, 204 secure long stay cycle parking spaces for students would be provided – these would be located at ground and mezzanine level within the southernmost railway arch. The mix of formats would be:

- 87 two-tier Josta Stands [174 spaces] (85.3% of the total);
- 10 standard Sheffield Stands [20 spaces] (9.8% of the total); and

- 5 Sheffield Stands for use by accessible/larger cycles [10 spaces] (4.9% of the total).
420. As part of the planning application, indicative furnished layouts have been supplied showing the southernmost arch could comfortably accommodate the mix of long-stay formats, as listed above, with sufficient manoeuvring room for users. Access from the exterior into the interior of the two separate store rooms would be via two pass doors, in accordance with LCDS standards, to minimise tailgating opportunities. The mezzanine-level store room would be served by a cycle lift. CCTV is proposed at the entrance of the store to ensure safety and security. Full detailed plans of the cycle store and the stands will be required by obligation prior to first occupation of the building.
421. As the proposal includes a relatively small quantum of flexible commercial space, and because there will be limited number of on-site staff present at any one time in respect of the student accommodation, the non-provision of dedicated showers for non-resident cyclists is acceptable in this instance.
422. In addition to the 204 long-stay spaces detailed above, 12 pre-loaded folding cycle lockers (providing a total of 12 spaces) would be located within the foyer of the main building. This is a non-conventional form of long-stay cycle parking. Nevertheless, the provision is welcomed as an additional benefit of the scheme, as this typology removes the barriers to cycling that some students face, which include:
- the cost of renting London cycles;
  - the difficulties in owning a private cycle (e.g. an international student for whom purchasing a cycle for their study duration would not be suitable, or a student staying in the accommodation during the summer let period).
423. As such, this provision can be advantageous to those who may not regularly choose, or may not have previously sought out, cycling as a means of travel. A planning obligation is recommended to ensure that the cycle lockers remain free-of-charge and for the exclusive use of student staying in the accommodation.
424. While for the purposes of this assessment, the long-stay requirement for the flexible commercial unit has been treated as zero, facilities could realistically be provided as part of the fit-out of the premises, given that the requirement is low (2 spaces).
425. It is recognised that the total number of long-stay spaces falls short of the Southwark Plan requirements, being 83% of the minimum (88% if including the lockers). Due to the constrained nature of the site, it would be very challenging for the applicant to meet these higher standards without significantly impacting on the overall provision of housing and/or amenity spaces within the scheme. While some weight should be given to the failure to meet the Southwark Plan standards, having regard to the other various benefits of the scheme, this matter would not warrant the refusal of planning permission.

### Short-stay cycle parking

426. With regard to the proposed short-stay (visitor) provision, six stands all in a Sheffield format are proposed, providing 12 spaces in total. The stands would be sited on the stretch of Rockingham Street footway immediately to the southwest of the proposed tower. This is an appropriate location, as it would keep the Low Line clear of cycle storage.
427. Similarly to the long-stay provision, while the minimum London Plan requirement would be met by the short-stay provision, the minimum Southwark Plan requirement would not. Given that there is very limited public realm available around the base of the building and within the red line boundary of the site to accommodate visitor cycle parking, and having regard to the applicant's offer to contribute towards investment locally in TfL (Santander) docking stations, in this particular instance the shortfall is considered permissible.

### Improving access to cycle hire options

428. Given that the town centre is a key destination and the development would introduce up to 7 new FTE employees to the site as well as up to 244 students when all rooms are occupied, the applicant has agreed to contribute £100,000 towards investment in the monitoring and management of TfL (Santander) docking stations within the vicinity of the site. To be secured in the Section 106 Agreement, this contribution would meet the requirements of Policy T5 of the London Plan and Policy P53 of the Southwark Plan.

### Legible London signage

429. The applicant has agreed, at the request of TfL, to make a contribution of £16,000 towards providing new and refreshed Legible London signage. This will be secured in the Section 106 Agreement.

### Healthy Streets

430. London Plan Policy T2 requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with TfL guidance.
431. Some ways in which the proposal would support the ten indicators are:
- It would be car free save for one wheelchair parking space, thus promoting walking, cycling and use of public transport;
  - It would provide investment in sustainable transport facilities and services to commensurately mitigate the impact on existing infrastructure;
  - it would enhance public realm around the site as well as within the surrounding network of streets; and
  - it has been designed to minimise air and noise pollution.

432. The Active Travel Audit submitted by the applicant identified that level, good quality footway provision is the largest barrier to active travel within the vicinity of the site.
433. In accordance with Healthy Streets and having had regard to the findings of the applicant's Active Travel Audit, the Transport Policy Team has sought various contributions from the applicant towards a range of highway safety measures together with improvements to pedestrian/cycle routes in the vicinity of this development. The specific set of works is detailed in the 'Planning Obligations: Summary Table' in a later part of this report.

### Transport summary

434. Having considered all transport and traffic related implications, the Council's Highways, Transport and Waste Management Teams are satisfied with the proposal. The scheme would minimise vehicle movements by prioritising use of public transport, walking and cycling, and by encouraging consolidation of deliveries.

## **Environmental matters**

### Construction management

435. Some public representations have raised concerns that construction activities will generate noise, dust, traffic and associated pollution. The applicant has submitted an Outline Environmental Construction Management Plan explaining how construction activities will be managed to minimise neighbour amenity, environmental and highway network impacts. This document has been reviewed by the relevant transport and environment consultees, who have deemed it to be satisfactory as a framework document.
436. In order to ensure that increases in traffic, noise and dust associated with the demolition and construction phases of the development are minimised, a Final Construction Environmental Management Plan and a Construction Logistics Plan are to be required by condition.

### Flood risk, resilience and safety

437. The site is in Flood Zone 3 and is located within an area benefitting from flood defences. The applicant's Flood Risk Assessment sets out that the site is at low risk of groundwater flooding and only a small portion of it is at risk of surface water flooding. The Environment Agency has reviewed the applicant's Flood Risk Assessment and considers it to be acceptable.
438. In terms of flood resilience and safety, the Council's Flood Risk Management Team has assessed the applicant's Flood Risk Assessment and is satisfied that:
- the site will not flood as a result of the 1 in 30 year rainfall event;

- there will be no flooding of buildings as a result of events up to and including the 1 in 100 year rainfall event;
- on-site flow as a result of the 1 in 100 year event (with a climate change consideration) will be suitably managed via adjusted floor levels directing flows away from buildings; and
- the basement storey will be safeguarded from ingress with suitable tanking.

439. Compliance with the Flood Risk Assessment will be secured by way of a condition, and a pre-commencement obligation will be imposed requiring submission of a Flood Warning and Evacuation Plan.

### Sustainable urban drainage

440. The applicant's Drainage Strategy, which is contained within the applicant's Flood Risk Assessment, proposes that surface water flows would be attenuated through the use of a blue/green roof system, complemented by geo-cellular storage crates located beneath the paved areas around the base of the building. This has been deemed satisfactory by the Council's Flood Risk Management Team. Two conditions are recommended, one requiring details of the final surface water drainage system to be submitted prior to commencement of the development, and the other requiring submission of a verification report prior to occupation.

### Land contamination

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

### Basement-related impacts

442. A Basement Impact Assessment (BIA) was submitted with the application. It assesses predicted ground movements and estimates of any possible degree of damage (according to the Burland scale) on nearby structures and buildings. The BIA concludes that the properties adjacent to the proposed basement are not expected to suffer damage any greater than Damage Category 1 (Very Slight) whereas the buildings farther away are expected to suffer damage no greater than Damage Category 0 (Negligible). The Council's Environmental Protection Team has assessed the BIA and raised no objections.

### Wind microclimate

443. London Plan Policy D9 requires all tall building proposals not to cause changes to the wind environment that would compromise comfort and the enjoyment of open spaces around the building and in the neighbourhood. Southwark Plan

Policies P14 and P56 require wind effects to be taken into consideration when determining planning applications, as does Policy P17 where the proposal is a tall building.

444. The applicant's Wind Microclimate Report concludes that:

- wind conditions with the proposed development in place would be no worse than the existing baseline scenario; and
- pedestrian thoroughfares and entrances at the site would have suitable wind conditions for the intended use.

445. When considering a future scenario including the cumulative proposed development within the area, wind conditions on site and in the nearby surrounding area would be calmer than with the existing surrounding buildings in situ.

446. Given that no wind or microclimate mitigation measures would be required and wind conditions surrounding the proposed development would be suitable and safe for the intended use or no worse than in the baseline scenario, it can be concluded that London Plan Policy D9 and Southwark Plan Policies P14, P17 and P56 have been met.

### Air quality

447. An Air Quality Assessment was submitted with the application, which considers the air quality impacts arising from the construction and operational use of the development, taking into account all relevant local and national guidance and regulations

448. In terms of the construction phase, the Outline Construction Environmental Management Plan sets out a range of mitigation. Proposed measures include locating machinery and dust causing activities away from receptors, enclosing activities with screens and barriers to prevent dust dispersion, covering soil or debris mounds with tarpaulins to prevent dust becoming airborne, and ensuring all on-road vehicles comply with the London Low Emission Zone requirements.

449. The proposed building itself would be all-electric (meaning there would be no on-site combustion), which mitigates air quality issues and facilitates significant advances towards zero carbon in future decades as the National Grid continues to decarbonise

450. The Air Quality Assessment concludes that, subject to the proposed mitigation measures, the effects on air quality during construction and operation are considered to be negligible. The Council's Environmental Protection Team has reviewed the Air Quality Assessment and raised no objection.

### Light pollution

451. With respect to light pollution from interior sources, no undue effects would result from the occupation of the proposed commercial and residential uses.

452. With respect to light pollution from exterior sources, buildings close to existing residential uses are not typically fitted with external lighting above ground floor level in the interests of minimising amenity harm to the surroundings. The proposed development includes the installation of lighting in the form of downlights and catenary illumination over the Low Line. These lighting additions would be set no higher than ground/mezzanine level, and not in close proximity to surrounding residential dwellings. As such, they would not result in overspill harmful to residential amenity.
453. In summary, the proposal does not raise light pollution concerns in this town centre and CAZ location. The final external lighting proposals, including any pre-determined dim-down and turn-off times, will be agreed through the Final Lighting Strategy, to be approved by the Council prior to first occupation of the building; this will be secured by condition.

### Fire safety

454. Policy D12 of the London Plan 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.
455. A Fire Strategy was submitted with the application; this was replaced by an updated version when the proposed development was amended mid-way through the application process to incorporate a second stair. The updated Fire Strategy includes a matrix that assesses the scheme for compliance against the relevant parts of Policy D12. Among other things, the Fire Strategy confirms that:
- the building would be served by two stairs for means of escape and fire service operations;
  - the corridors that lead to both stairs on each floor would be separated, and that both of these corridors would have mechanical smoke ventilation;
  - the lifts would stop at ground floor level and would not be connected to the basement level;
  - the building would contain a single firefighting shaft incorporating a firefighting lift, evacuation lift, wet riser outlets and designed smoke ventilation system to the lobbies;
  - all plant rooms and common rooms accessed from single direction escape would be provided with lobby protection to the residential corridor;
  - a “stay put” policy would apply for the student rooms, but a “simultaneous evacuation” strategy would apply for all other ancillary areas (such as the common rooms);
  - appropriate active fire protection system would be installed, including fire detection and alarm, emergency lighting and signage, sprinklers and smoke control systems;
  - in the case of an emergency, the evacuation lift would switch from its everyday use to become a tool only for the evacuation of persons with disabilities and is not considered a general escape route;

- Building Regulations Approved Document B compliance would be achieved; and
- the internal layout would achieve compliant travel distances.

456. The Fire Strategy was produced by fire risk engineering consultancy Orion Fire Engineering. The contents of the document have been checked and approved by a certified fire risk engineer (a Member of the Institute of Fire Engineers).

457. The relevant fire risk minimisation policies of the London Plan are deemed to have been satisfied. A condition is recommended to ensure the construction and in-use operation of the building are carried out in accordance with the Fire Strategy.

## **Energy and sustainability**

458. In the context of energy and sustainability policy, student housing is treated as a non-residential use.

459. Chapter 9 of the London Plan deals with all aspects of sustainable infrastructure and identifies the reduction of carbon emissions as a key priority. Policy SI2 “Minimising Greenhouse Gas Emissions” requires all developments to be net zero carbon with a minimum on-site reduction of 35% against the Part L 2021 baseline for both commercial and residential uses. Non-residential development should achieve a 15% reduction in emissions through energy efficiency measures. Where developments are unable to meet net zero carbon targets any shortfall between the minimum 35% and zero carbon must be mitigated by way of a payment towards the carbon offset fund. The energy strategy for new developments must follow the London Plan hierarchy (comprising ‘be lean’, ‘be clean’, ‘be green’ and ‘be seen’) and this must be demonstrated through the submission of an Energy Strategy with applications, as well as post construction monitoring for a period of 5 years.

460. Southwark Plan Policies P69 “Sustainability Standards” and P70 “Energy” reflect the approach of the London Plan by seeking to ensure that non-residential developments achieve a BREEAM rating of ‘Excellent’ and include measures to reduce the effects of overheating using the cooling hierarchy. The policies pursue the ‘lean, green, clean and seen’ principles of the London Plan and requires non-residential buildings to be zero carbon with an on-site reduction of at least 40% against the Part L 2021 baseline. Any shortfall must be addressed by way of a financial contribution towards the carbon offset fund.

## **Energy and carbon emission reduction**

461. Following the resolution of Part L software modelling issues in December 2022, The GLA has updated its Energy Assessment Guidance 2022 to confirm that all new major planning applications submitted from 1 January 2023 should now be assessed against Part L 2021 of the Building Regulations when assessing policy compliance for SI2. All major development planning applications that were submitted before 1 January 2023 (as is the case with 22/AP/1068) will continue to be assessed and determined using Part L 2013 of the Building Regulations. It



is for this reason that the following paragraphs of this report discuss the carbon savings performance of the proposal against Part L 2013.

### Be Lean

462. In terms of meeting the 'be lean' tier of the hierarchy, a range of passive and active measures are proposed. The passive measures include:

- window 'g' values of 0.4 to maximise beneficial solar gain in winter and limit excessive solar gain in summer;
- optimised glazing ratio to reduce solar gains whilst ensuring access to daylight.
- the use of exposed concrete where possible to provide high thermal mass to moderate the cooling loads;
- low air permeability to reduce leakage through the façade and roof; and
- very high level of fabric performance across the whole development (0.15 W/m<sup>2</sup>K where the Building Regulations limiting value is 0.26 W/m<sup>2</sup>K);

463. The active measures include:

- low energy proposed lighting throughout the student accommodation;
- low energy light fittings with photocell (i.e. daylight compensation) controls in the common areas and auto on / auto off presence detection where appropriate elsewhere in the development; and
- energy efficient heat recovery ventilation systems in the student bedrooms, with automatic summer bypass.

464. These 'demand reduction' measures will achieve a 11% reduction in carbon emissions, falling short of the policy target of 15%.

### Be Clean

465. The site is within an area identified as having district heating potential and is within a local heat study area, as identified within the London Heat Map. However, no district heating network with connection opportunities exists at the current time. As such, all parts of the student accommodation would be served by a centralised energy centre, which itself would draw from a centralised air-source heat pump system (ASHP).

466. By designing-in a futureproofed plant room at basement level, the opportunity to link the development into a wider district heating system would be safeguarded. This meets the requirements of Policy SI 3 of the London Plan.

467. As no immediate connection to a district heating network is proposed, no carbon savings are reported from the 'be clean' stage of the energy hierarchy.

### Be Green

468. With respect to the 'be green' tier of the hierarchy, the applicant has proposed the following technologies:

- air source heat pumps (a mix of low and high temperature models) to supply heat and hot water; and
- photovoltaic panels (2.5kWp) with an area of 13.2 square metres (to be located on the south face of the plant screen at rooftop level) to supply direct current electricity.

469. On a side-wide basis, carbon emissions would be reduced by 54% through these 'be green' measures. The applicant has demonstrated that opportunities for renewable energy by producing, storing and using renewable energy on-site have been maximised.

#### Be Seen

470. Introduced as part of the London Plan 2021, 'be seen' is the newest addition to the GLA's energy hierarchy. It requires developments to predict, monitor, verify and improve their energy performance during end-use operation. All applications should conduct a detailed calculation of unregulated carbon emissions as part of the compliance with the 'be seen' policy and associated guidance.

471. The applicant's Energy Statement calculates that unregulated per annum energy emissions for the development would be 57.4kWh/m<sup>2</sup>.

472. The applicant's Energy Statement states that a suitable metering strategy will be implemented to record energy consumption and generation from the point at which the different uses within the development are occupied. It is recommended that the on-going requirements for monitoring energy consumption and generation, and the associated reporting to the GLA in line with policy, be secured through a planning obligation.

#### Total energy savings

473. 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.

474. The proposal would reduce on-site regulated carbon dioxide emissions by 64% over a notional building minimally compliant with the Building Regulations 2013, which is above the 40% on-site target. The performance is summarised in the below table:

<b>Development CO2 Emissions from each stage of the Energy Hierarchy</b>			
	<b>Total Regulated Emissions</b>	<b>CO2 Savings</b>	<b>Percentage saving</b>
<b>Part L 2013 Baseline</b>	285 tonnes CO2		
With <b>Be Lean</b> applied	254 tonnes CO2	31 tonnes CO2	11%
With <b>Be Clean</b> applied	254 tonnes CO2	0	0

With <b>Be Green</b> applied	102 tonnes CO2	153 tonnes CO2	54%
<b>Cumulative saving</b>		<b>183 tonnes CO2</b>	<b><u>64%</u></b>
<b>Shortfall on carbon zero</b>	<b>102 tonnes CO2</b>		

475. The energy savings, as detailed above, which take into account the decarbonisation of the electricity grid, demonstrate the good environmental and sustainability credentials of the proposed development. The total per annum shortfall in savings relative to carbon zero would, at a rate of £95/tonne for 30 years, generate an offset contribution of £289,881. The following paragraphs explain why an offset contribution generated by an assessment against the Part L 2021 baseline, not the 2013 baseline, will be secured in the Section 106 Agreement.

#### Implications of the change to the Part L 2021 baseline

476. An earlier part of this report explained why the proposal has been assessed and determined against the Part L 2013, rather than the Part L 2021, baseline.

477. Only where a planning application benefits from 'transitional arrangements' may the proposal be built to Part L 2013. These 'transitional arrangements' apply where:

- the proposal was registered with Building Control before 15 June 2022; and
- works commenced on-site before 15 June 2023.

478. Neither of the above are likely for this proposed development, given that planning permission will almost certainly not be issued before 15 June 2023 due to the need to complete the Section 106 Agreement. The proposal will therefore be expected to be built to Part L 2021.

479. The applicant recently commissioned a study of the performance of the proposed development against Part L 2021. The results indicate the proposal would reduce on-site regulated carbon dioxide emissions by 11% over a notional minimally compliant building. The performance is summarised in the below table:

<b>Development CO2 Emissions from each stage of the Energy Hierarchy</b>			
	<b>Total Regulated Emissions</b>	<b>CO2 Savings</b>	<b>Percentage saving</b>
<b>Part L 2021 Baseline</b>	29.8 tonnes CO2		
With <b>Be Lean</b> applied	28.3 tonnes CO2	1.4 tonnes CO2	5%
With <b>Be Clean</b> applied	28.3 tonnes CO2	0	0
With <b>Be Green</b> applied	26.5 tonnes CO2	1.8 tonnes CO2	6%

<b>Cumulative saving</b>	<b>3.2 tonnes CO2</b>	<b><u>11%</u></b>
<b>Shortfall on carbon zero</b>	<b>26.5 tonnes CO2</b>	

480. It must be recognised that the same building assessed under previous guidance (Part L 2013 of the Building Regulations with SAP 10 emission rates) resulted in a 64% CO2 reduction below the then baseline. The percentage saving of 11% reported by the recently-commissioned study is, therefore, largely a consequence of the change in reporting baseline. The Mayor's note to accompany the GLA Energy Assessment Guidance 2022 recognises that in the initial period following operationalisation of the Part L 2021 baseline, achieving the policy targets will be challenging particularly for non-domestic uses. The note says:

*“Initially, non-residential developments may find it more challenging to achieve significant on-site carbon reductions beyond Part L 2021 to meet both the energy efficiency target and the minimum 35 per cent improvement. This is because the new Part L baseline now includes low carbon heating for non-residential developments but not for residential developments. However, planning applicants will still be expected to follow the energy hierarchy to maximise carbon savings before offsetting is considered”.*

481. On account of the above, the regulated energy savings performance of the proposal is considered acceptable. The total per annum shortfall in savings relative to carbon zero would, at a rate of £95/tonne for 30 years, generate an offset contribution of £75,549.

482. The £75,549 contribution will be secured through the Section 106 Agreement, with appropriate adjustment clauses should there be any improvements to the carbon emissions in the post-planning design development stages.

### Whole life cycle and carbon capture

483. London Plan Policy SI2 requires all major development proposals to be supported by a whole life cycle carbon assessment. This assesses the embodied and operational emissions associated with redevelopment.

484. 'Embodied carbon' is the term used to describe the carbon emissions associated with:

- extraction and manufacturing of materials and products;
- in-use maintenance and replacement;
- end of life demolition, disassembly and disposal; and
- the transportation relating to all three.

485. 'Operational carbon' is the carbon dioxide associated with the in-use operation of the building. This usually includes carbon emissions associated with heating, hot water, cooling, ventilation and lighting systems, as well as those associated with cooking, equipment and lifts.

486. Driven by the aim of achieving net carbon zero for new development by closing the implementation gap, whole life cycle carbon assessments are monitored at the pre-application, submission and post-construction stages. Policy P70 of the Southwark Plan reinforces the need to calculate whole life cycle carbon emissions through a nationally recognised assessment and demonstrate actions taken to reduce life cycle carbon emissions
487. The submitted whole life carbon assessment for the planning application considers the operational carbon and embodied carbon of the proposal throughout its life from construction, use and deconstruction. The assessment finds that over a 60-year study period, the development's operational and embodied load would be:
- 739.48kgCO<sub>2</sub>e/m<sup>2</sup> for Modules A1-A5 (covering the product sourcing and construction stages); and
  - 387.68 KgCO<sub>2</sub>e/m<sup>2</sup> for modules B to C (covering the in-use and end-of-life stages), excluding operational energy and water.
488. The benchmark set by the GLA for Modules A1-A5 is 850kgCO<sub>2</sub>e/m<sup>2</sup>, with an aspirational benchmark of 500 kgCO<sub>2</sub>e/m<sup>2</sup> GIA. The benchmark for Modules B-C is 350kgCO<sub>2</sub>e/m<sup>2</sup>, with an aspirational benchmark of 300kgCO<sub>2</sub>e/m<sup>2</sup>. As such, the WLC performance for Modules A1-A1 is compliant is considered acceptable. While the performance for Modules B to C falls short of the benchmark, it does so by a relatively small degree. Two conditions to require two further stages of whole life-cycle carbon assessment in the detailed design and completion stages are proposed

### Circular Economy

489. Southwark Plan Policy P62 "Reducing Waste" states that a Circular Economy Statement should accompany planning applications referable to the Mayor. Circular economy principles include conserving resource, increasing efficiency, sourcing sustainably, designing to eliminate waste and managing waste sustainably at the highest value. London Plan Policies GG5 "Growing a Good Economy", D3 "Growth Locations in the Wider South East and Beyond" and SI7 "Reducing Waste" and all mention circular economy principles and the benefits of transitioning to a circular economy as part of the aim for London to be a zero-carbon city by 2050.
490. A detailed Circular Economy Statement was submitted with the application, which sets out strategic approaches, specific commitments and the overall implementation approach.
491. The broad strategic approaches for the development include adopting lean design principles, minimising waste, specifying materials responsibly and sustainably, and designing for longevity, adaptability and flexibility. Ways this will be achieved include:
- minimising material use through prefabrication off-site;

- using as hardcore the contents of broke-up surfaces on site such as tarmacs and subbases;
- using steel with high recycled content;
- using concrete that has a minimum Ground Granulated Blast Furnace Slag (GGBS) value of 50%;
- making design and material selections in keeping with future weather requirements for better thermal performance and energy efficiency;
- using timber certified under the Programme of Endorsement of Forest Certification (PEFC) or Forest Stewardship Council (FSC);
- where possible giving preference to materials with Environmental Product Declarations;
- sizing the ASHP to meet the heating loads efficiently to ensure there is no wasted over capacity; and
- allowing for all major plant to be dismantled and removed.

492. Specific targets committed to by the applicant include:

- diverting at least 95% of the waste from going into landfill or for incineration;
- requiring at least 20% of the total value of materials to be from manufacturers that use recycled and reused content in their products.
- ensuring the contractor prepares and implements a Site Waste and Resource Management Plan (SWMP/RMP).

493. The application has addressed the requirements of London Plan Policy SI7 “Reducing Waste and Supporting the Circular Economy”, Southwark Plan Policy P62 “Reducing Waste”, and has referenced the GLA’s guidance in producing the Circular Economy Statement. Conditions are proposed requiring post-completion reporting. Subject to these conditions, the proposal is considered to comply with the sustainable materials element of Policy P17 “Tall Buildings”.

### Overheating and cooling

494. London Plan Policy SI4 “Managing Heat Risk” details that major development proposals should demonstrate how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy. Policy P69 “Sustainability Standards” of the Southwark Plan states that development must reduce the risk of overheating, taking into account climate change predictions over the lifetime of the development, in accordance with the cooling hierarchy.

495. The six-step hierarchy that should be followed when developing a cooling strategy for new buildings 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).

496. The site is exposed to high ambient noise levels, meaning it would not be possible to maintain acceptable noise levels within the building if the windows were open for extended periods to mitigate the risk of overheating, therefore the occupied spaces are comfort cooled. However,

#### Minimise internal heat generation

497. Internal heat generation is to be minimised through measures including low energy lighting (to reduce lighting gains), low heating system water temperatures, and applying insulation to the communal pipework in excess of the Building Regulations and British Standards enhanced specification to avoid distribution losses.

#### Reduce heat entering the building

498. The heat entering the proposed development is to be reduced by a combination of measures. These include solar control glazing incorporating a G value of 0.4, deep reveals, the use of blinds on all fixed window panes, and the use of security screens on the opening panes

#### Manage the heat within the building

499. Good floor-to-ceiling heights would be achieved and floor slabs would be left partially exposed where possible.

#### Use passive ventilation

500. Despite the need for comfort cooling being established at the outset because of the noise levels locally prohibiting windows being open for extended periods, the applicant first assessed the student bedrooms and common rooms as naturally ventilated. The purpose of this exercise was twofold: firstly, to ensure solar gains were not excessive; and secondly, to demonstrate that overheating would not occur if natural ventilation was possible.

501. When assessing the student bedrooms and common rooms as predominantly naturally ventilated, all rooms were found to be compliant with Criterion 1 of the CIBSE Technical Memoranda, but the majority fell short of complying with Criterion 2 by between 1 to 30 hours per year. This can be attributed to the security screens to the windows of the student bedrooms having an impact on the ventilation rates overnight. Assessing the bedrooms as naturally ventilated spaces without the security screen in place (i.e. similar to a normal apartment arrangement) would result in full compliance. However, due the high ambient external noise levels and the attendant need to provide an installation that will accommodate the windows in the closed position throughout the year, a restricted level of comfort cooling is required (as discussed below).

### Use mechanical ventilation

502. The student bedrooms would incorporate mechanical ventilation. This system, which would be stimulated when the air temperature reaches 22 degrees Celsius, would temper the fresh air, allowing the rooms to qualify as “Predominantly Mechanically Ventilated”. Essentially, the system provides additional ventilation to suppress the internal temperature as much as possible. This reduces the cooling demand because it avoids –or at least delays for as long as possible– a breach of the maximum temperature (24 degrees Celsius), at which point the peak l0p cooling system would kick in.
503. All student bedrooms are predicted to remain within acceptable temperature ranges as defined by CIBSE TM59, for predominantly mechanical ventilated dwellings, without the need to open the windows due to the high external ambient noise levels. The peak l0p cooling is designed to allow elevated temperatures on hotter days to create conditions similar to those of a naturally ventilated space. Restricting the cooling capacity in this way minimises the energy consumed, while ensuring conditions are not higher than the upper temperature for an excessive number of hours. As full temperature control through the summer would not be available to the students, the bedrooms would not constitute ‘air conditioned’ spaces.
504. The communal corridors would be ventilated using an environmental ventilation system to remove excess heat from the corridors via the smoke ventilation system.

### Use active cooling systems (low carbon)

505. While the steps taken in accordance with the cooling hierarchy, as set out above, would reduce the need for cooling, they would not be sufficient to avoid overheating risk throughout the year in all parts of the proposed development. As such, active cooling would be required in the form of highly efficient low carbon air source heat pumps to serve the common rooms, reception and staff offices where higher occupancy levels and equipment gains are anticipated. This is due to the need to keep the windows closed because of the external noise levels, particularly from the railway.

### Summary

506. Following the cooling hierarchy, the applicant has demonstrated that the building cooling demand has been kept as low as possible with minimal solar gains. Active cooling is proposed for the development because –in this location where ambient noise levels are high, which in turns prohibits windows being open for long periods– natural ventilation alone would not be sufficient to guarantee the occupiers’ and users’ comfort, in line with the criteria set out in CIBSE TM 52 and TM 59 guidance. With the proposed measures taken into account, the overall building efficiency would be enhanced. This is considered to be in compliance with London Plan Policy SI4 and Southwark Plan Policy P69.

### BREEAM



507. Policy P69 of the Southwark Plan states that non-residential development must achieve a BREEAM rating of 'Excellent'. The applicant's BREEAM indicates 'Excellent' can be achieved, and a planning condition is recommended to secure this.

### Water efficiency

508. The Sustainability Strategy submitted by the applicant confirms that the proposed development aims to minimise water consumption such that the BREEAM excellent standard for the 'Wat 01' water category would be achieved, as required by London Plan Policy SI5. This will be achieved through the specification of features such as:

- water-efficient sanitary fittings,
- a water meter on the mains water supply; and
- a leak detection system will be installed.

### **Digital connectivity infrastructure**

509. 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.

510. To ensure London's long-term global competitiveness, Policy SI6 "Digital Connectivity Infrastructure" of the London Plan 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.

511. The applicant has not confirmed in writing that the development would have the incoming duct arrangements to suit the provisions from the local networks, or that by the time construction works are underway 1GB/s fibre should be available. In this Major Town Centre location, it is very unlikely that delivering such digital infrastructure would prove difficult, and as such it is considered acceptable in this instance for the requirements of Policy SI6 post-decision through a Digital Connectivity Strategy planning condition.

### **Socio-economic impacts**

512. London Plan Policy E11 "Skills and Opportunities for All" requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases. This requirement is also covered by Southwark Plan Policy P28 "Access

to Employment and Training”, with the methodology for securing these opportunities prescribed by the Council’s Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015 with 2020 Update)

513. In accordance with the policy framework, there would be a requirement for this development to deliver training and employment during the construction phase only. Four construction industry apprentices, 17 short courses and 17 sustained jobs for unemployed Southwark Residents would be required. These would all need to be filled by the applicant in accordance with a Construction Phase Employment, Skills And Business Plan. These obligations will be secured through the Section 106 Agreement.
514. In terms of direct employment, the student housing element of the proposal has the potential to deliver up to 3 FTE positions, while the retail/service/dining unit has the potential to create up to 4. The maximum FTE additionality from the site would, therefore, be 7 jobs.

### Planning obligations

515. London Plan Policy DF1 “Delivery of the Plan and Planning Obligations” and Southwark Plan Policy IP3 “Community Infrastructure Levy and Section 106 Planning Obligations” advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. These policies are reinforced by the Section 106 Planning Obligations and CIL SPD, which sets out in detail the type of development that qualifies for planning obligations. The NPPF echoes the Community Infrastructure Levy Regulation 122 which requires obligations to 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

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

<u>Obligation</u>	<u>Mitigation / Terms</u>
<b>Viability and affordable housing</b>	
AFFORDBALE HOUSING PAYMENT IN-LIEU	<p>Applicant is to pay a minimum of <b>£8,540,000 (subject to BCIS All in Tender Price Index)</b> in lieu of providing on-site affordable housing, equivalent to the maximum viable amount (as agreed between the applicant’s viability consultants, GLA Viability officers and the Council’s independent assessor).</p> <p>The total sum is to be paid in three tranches linked to stages of construction, as follows:</p>

	<ul style="list-style-type: none"> <li>- Instalment 1: 25% prior to implementation (i.e. <b>£2,135,000 BCIS All in Tender Price Index-linked</b>);</li> <li>- Instalment 2: 50% prior to completion (i.e. <b>£4,270,000 BCIS All in Tender Price Index-linked</b>); and</li> <li>- Instalment 3: 25% prior to first occupation (i.e. <b>£2,135,000 BCIS All in Tender Price Index-linked</b>).</li> </ul> <p>The staging set out above is in accordance with section 6.3.12 of the Council's Draft Affordable Housing SPD 2011.</p>
AFFORDABLE HOUSING PAYMENT IN-LIEU COLLAR	<p>When Instalment 3 is triggered, if the total PiL paid by the applicant (i.e. all three instalments) would amount to less than the agreed 'collar' of £11,161,826, <b>the applicant must pay the Instalment 3 baseline amount (of £2,135,000 BCIS All in Tender Price Index-linked) plus the outstanding difference necessary to bring the total PiL paid up to £11,161,826.</b></p>
AFFORDABLE HOUSING EARLY STAGE REVIEW	<p>Early Stage Review Mechanism to be triggered if substantial implementation has not occurred within 24 months of planning permission being granted.</p>
AFFORDABLE HOUSING LATE STAGE REVIEW	<p>Late Stage Review to be required at first full year of occupation.</p> <p>In the event that an additional in-lieu affordable housing payment is required following the identification of a profit surplus through the Late Stage Review process, occupation of more than 75% of the student accommodation in the third academic year shall be prohibited unless and until said monies (index-linked) have been paid in full to the Council.</p> <p>The Late Stage Review cap shall be £1,300,000.</p>
<b>Local economy: Employment and training</b>	

<p>CONSTRUCTION PHASE JOBS/ CONTRIBUTIONS</p>	<p>Development to:</p> <ul style="list-style-type: none"> <li>- Deliver <b>17 sustained jobs</b> to unemployed Southwark residents,</li> <li>- Deliver <b>17 short courses</b>, and;</li> <li>- Take on <b>4 construction industry apprentices</b> during the construction phase.</li> </ul> <p>Or make the pro-rata Employment and Training Contribution which, at maximum, would be <b>£81,650</b>. This breaks down as:</p> <ul style="list-style-type: none"> <li>- <b>£73,100</b> against sustained jobs;</li> <li>- <b>£2,550</b> against short courses, and;</li> <li>- <b>£6,000</b> against construction industry apprenticeships.</li> </ul>
<p>CONSTRUCTION PHASE EMPLOYMENT, SKILLS AND BUSINESS</p>	<p>The Plan would be expected to detail:</p> <ul style="list-style-type: none"> <li>- methodology of training, skills, support etc.;</li> <li>- targets for construction skills and employment outputs;</li> <li>- methodology for delivering apprenticeships; and</li> <li>- local supply chain activity methodology.</li> </ul>
<p>Applicant's Position: <b>Agreed</b></p>	
<p>Applicant's Position: <b>Agreed</b></p>	
<p><b>Operation and management of student accommodation</b></p>	
<p>STUDENT MANAGEMENT PLAN</p>	<p>Prior to occupation of the development, a Final Student Management Plan is to be submitted to and approved by the Council. The Final Student Management Plan shall be based on the principles established by the application-stage Student Management Plan and shall include details of:</p> <ul style="list-style-type: none"> <li>- the day to day operation of the student housing to ensure noise and disturbance is minimised during the day- and night-time (including codes of behaviour / conduct and other protocols for managing breaches of acceptable behaviour);</li> <li>- the logistics and coordination of the move-in and move-out arrangements to minimise disruption to the public highway (and shall include specified management measures in respect of both the move-in and move-out period, not just the former, including coordination of arrangements with other student residences in the area so as to avoid overload at peak times);</li> </ul>

	<ul style="list-style-type: none"> <li>- deliveries and servicing management;</li> <li>- security and surveillance measures; and</li> <li>- strategies for establishing and managing relationships and lines of communication with local residents and other potentially affected parties.</li> </ul> <p>The approved Final Student Management Plan (as amended from time to time) shall be complied with throughout the lifetime of the development.</p>
USE OF PREMISES	<p>The development is:</p> <ul style="list-style-type: none"> <li>- not to be used and occupied for anything other than its authorised purpose as accommodation available for letting as student accommodation to students;</li> <li>- to be used at all times as a single planning unit, with no part of it to be rented, sold, sub-let, licensed or otherwise disposed of in any form as a separate planning unit; and</li> <li>- -with respect to all parts of the basement and ground floor of the building, prohibited from being used in the future for sleeping accommodation</li> </ul> <p>The student accommodation may be let to part time and full time students from UK registered educational institutions during the holiday period.</p>
<b>Applicant's Position: Agreed</b>	
<b>Railway arches activation</b>	
RAILWAY ARCHES (EXTERNAL) WORKS SPECIFICATION	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to submit a 'Railway Arches (External) Works Specification' to the Council and receive its approval in writing.</p> <p>The 'Railway Arches (External) Works Specification' shall set out how the western elevation of the viaduct (and the three arches contained therein) between Tiverton Street and Rockingham Street shall be externally refurbished. The Specification shall comprise:</p> <ul style="list-style-type: none"> <li>- detailed drawings (plans, sections, large scale details etc.);</li> <li>- finishes schedule and samples of proposed materials to be used (door and window frames for the arch infills including spandrels, the decorative lattice-style panel insets etc.);</li> </ul>

	<ul style="list-style-type: none"> <li>- the external lighting strategy and details of any CCTV equipment;</li> <li>- signage details;</li> <li>- details of any boundary enclosures and entry gates;</li> <li>- demonstration that principles of Secured by Design have been incorporated;</li> <li>- commentary about how the external works have been designed and detailed to account for / respond to the placement of planters immediate in front of the façade on the Low Line; and</li> <li>- details of the phasing and timing for delivery.</li> </ul> <p>Thereafter, and for the lifetime of the development, the as-built external works shall be maintained in good working order (and refurbished as necessary) and the building owner shall commit to keeping/funding any illuminated signage or other illuminated features fully operational.</p> <p>Applicant's Position: <b>Agreed</b></p>
<p>RAILWAY ARCHES (INTERNAL) WORKS AND CYCLE STORAGE SPECIFICATION</p>	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to submit a 'Railway Arches (Internal) Works and Cycle Storage Specification' to the Council and receive its approval in writing.</p> <p>The 'Railway Arches (Internal) Works Specification' shall set out how the three arches within the stretch of viaduct between Tiverton Street and Rockingham Street shall be internally refurbished. The Specification shall comprise:</p> <ul style="list-style-type: none"> <li>- detailed drawings (plans, sections, large scale details etc.);</li> <li>- schedule of finishes (to include the floor finish);</li> <li>- demonstration that principles of Secured by Design and inclusive access have been incorporated;</li> <li>- lift maintenance strategy;</li> <li>- commentary about how the external works have been designed and detailed to account for / respond to the placement of planters immediate in front of the façade on the Low Line;</li> <li>- details of the phasing and timing for delivery and</li> <li>- cycle storage details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles, to comprise: <ul style="list-style-type: none"> <li>- no fewer than 87 two-tier Josta Stands [174 spaces];</li> <li>- no fewer than 10 standard Sheffield Stands [20 spaces];</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>- 5 Sheffield Stands for use by accessible/larger cycles [10 spaces]; and</li> <li>- (should there be sufficient space) lockers, showers and any other end-of-journey facilities.</li> </ul> <p>Thereafter, and for the lifetime of the development, the as-built internal works shall be maintained in good operational order (and refurbished as necessary) and shall not be used for any purpose other than:</p> <ul style="list-style-type: none"> <li>- the approved refuse storage (northern arch);</li> <li>- the approved flexible commercial use (middle arch); and</li> <li>- the approved cycle storage (southern arch);</li> </ul> <p>with in all three cases unfettered access to be made available to the eligible users.</p> <p>Applicant's Position: <b>Agreed</b></p>
<b>Retention of architectural design team</b>	
ARCHITECT NOVATION	<p>The ongoing involvement of the original design team (i.e. Maccreeanor Lavington Limited) shall be secured through the post-permission stages of the design process up to the practical completion of the building.</p> <p>Applicant's Position: <b>Agreed</b></p>
<b>Publicly-accessible open space</b>	
DETAILED DESIGN	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to submit a Publicly-accessible Open Space Specification for all areas of privately-owned publicly-accessible open space to the Council (specifically the Local Planning Authority, who shall liaise with the Highways Authority) and receive its approval in writing.</p> <p>The Publicly-accessible Open Space Specification shall demonstrate that the publicly-accessible open space has been designed to an adoptable standard (in accordance with the SSDM) and shall comprise:</p> <ul style="list-style-type: none"> <li>- detailed drawings (plans, sections, levels etc.);</li> <li>- details of street furniture (cycle stands, seating, bollards etc.);</li> <li>- details of planting;</li> <li>- details of external lighting and CCTV;</li> <li>- details of any boundary enclosures and entry gates;</li> </ul>

	<ul style="list-style-type: none"> <li>- finishes schedules and samples of proposed materials;</li> <li>- demonstration that principles of Secured by Design have been incorporated; and</li> <li>- details of the phasing and timing for delivery.</li> </ul> <p>Applicant's Position: <b>Agreed</b></p>
DELIVERY AND SHORT-TERM MANAGEMENT	<p>Upon receipt of a Provisional Completion Certificate from the Council, the developer shall make the publicly-accessible open space available to the public (in accordance with the access hours and permitted rights of closure).</p> <p>Any defects within the first 12 months of opening are to be rectified by the developer.</p> <p>At the end of the initial 12 month period, the developer is to seek and receive from the Council a Final Completion Certificate.</p> <p>Applicant's Position: <b>Agreed</b></p>
LONG-TERM MANAGEMENT	<p>No part of the development shall be occupied until the developer has submitted to and received approval from the Council of a Public Realm Management Plan. The Plan shall:</p> <ul style="list-style-type: none"> <li>- set out a methodology to ensure the Low Line is kept free from obstruction;</li> <li>- set out the servicing arrangements for both the main building and the railway arches, together with a method for both controlling and monitoring this;</li> <li>- maintenance and cleaning arrangements;</li> <li>- demonstrate accordance with the Public London Charter LPG; and</li> <li>- include the name of the person(s) responsible for ensuring the effective provision of the publicly-accessible open space as public realm.</li> </ul> <p>The developer covenants to manage, maintain and allow public access to the publicly-accessible open spaces except for a limited period in certain circumstances (fire, flood etc.).</p> <p>Applicant's Position: <b>Agreed</b></p>
HOURS OF ACCESS	<p>The publicly-accessible open spaces shall be open 24 hours a day every day of the week including Bank Holidays (with the exception of the rights of closure detailed below).</p>



	Applicant's Position: <b>Agreed</b>
RIGHTS OF CLOSURE	The developer shall be entitled to close the publicly-accessible realm (with prior notification to members of the public) for up to one day per year so as to prevent public rights of way being obtained.
	Applicant's Position: <b>Agreed</b>
<b>Off-site Public Open Space Mitigation</b>	
NEWINGTON GARDENS ENHANCEMENT CONTRIBUTION	Prior to occupation, the developer is to contribute <b>£108,214</b> (index linked) (equating to £443.50 per student bed space) for improvement and maintenance works to Newington Gardens, required because of the increased use of the gardens by occupiers of the development.
	Applicant's Position: <b>Agreed</b>
<b>Archaeology</b>	
MONITORING AND SUPERVISION CONTRIBUTION	On signing of the Section 106 Agreement, a sum of <b>£11,171</b> is to be paid by towards monitoring and providing technical archaeological support during the works on and in the vicinity of the site.
	Applicant's Position: <b>Agreed</b>
<b>Transport impacts mitigation</b>	
TfL DOCKING STATION CONTRIBUTION	Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to contribute <b>£100,000</b> towards expansion of one or more TfL cycle docking stations in the vicinity of the site
	Applicant's Position: <b>Agreed</b>
LEGIBLE LONDON SIGNAGE	Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to contribute <b>£16,000</b> towards provision of new Legible London signage and/or and to enhance existing Legible London signage on the site and/or within the vicinity.
	Applicant's Position: <b>Agreed</b>

<p>LOCAL PUBLIC REALM UPGRADES CONTRIBUTION</p>	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to pay a contributory sum of <b>£48,848</b> towards necessary local public realm improvements to the Borough Road Network. The sum breaks down as follows:</p> <ul style="list-style-type: none"> <li>- <b>£20,640</b> towards the reconstruction of footway along Tiverton Street;</li> <li>- <b>£8,208</b> towards the reconstruction of footway along Rockingham Street;</li> <li>- <b>£20,000</b> towards a raised table on Rockingham Street.</li> </ul> <p>Works are to be carried out by the relevant highway authority.</p> <p>Applicant's Position: <b>Agreed</b></p>
<p>LONG-TERM PROVISION OF CYCLE LOCKERS FREE-OF-CHARGE</p>	<p>Prior to occupation, the pre-loaded folding cycle lockers shall be installed and available for use, and thereafter for the lifetime of the development the lockers shall remain free-of-charge and for the exclusive use of student staying in the accommodation.</p> <p>Applicant's Position: <b>Agreed</b></p>
<p>DELIVERY AND SERVICING MONITORING PLAN</p>	<p>Prior to occupation, a Delivery and Servicing Monitoring Plan is to be submitted to and approved by the Council. The Delivery and Servicing Monitoring Plan shall set out the method for monitoring and recording the number of servicing and delivery trips to and from the development.</p> <p>Applicant's Position: <b>Agreed</b></p>
<p>DELIVERY AND SERVICING MANAGEMENT BOND</p>	<p>Prior to occupation, a Delivery and Servicing Bond is to be paid to the Council. The bond will be <b>£9,733</b>, comprising:</p> <ul style="list-style-type: none"> <li>- a cash deposit of <b>£8,133</b> (index linked), calculated on the basis of £100 per three bedspaces; and</li> <li>- a monitoring fee of <b>£1,600</b> to cover the Council's costs of assessing the quarterly monitoring.</li> </ul> <p>For a period of two years from opening of the student accommodation scheme the daily vehicular servicing activity of the site is to be monitored (in accordance with the approved Delivery and Servicing Monitoring Plan) and returns made on a quarterly basis. If the site meets or better its own baseline target the Delivery and Servicing Management Cash Deposit will be returned to the</p>

	<p>developer within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the cash deposit will be made available for the Council to utilise for sustainable transport projects in the ward of the development.</p> <p>Irrespective of whether the development meets or fails to meet its baseline target, the Council will retain the monitoring fee.</p>
BUS SERVICES CONTRIBUTION	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to contribute <b>£135,000</b> (index linked) towards improved easterly bus services in the vicinity of this development</p>
	Applicant's Position: <b>Agreed</b>
<b>Highway impacts mitigation</b>	
BOROUGH ROAD NETWORK: SCOPE OF S278 WORKS	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to submit the Section 278 Highway Works Specification, detailed design and estimated costs to the Council (specifically the Local Planning Authority, who shall liaise with the Highways Authority) and receive its approval in writing.</p> <p>This Specification, detailed design and estimated costs shall comprise the following works, and all shall be constructed in accordance with SSDM standards:</p> <ul style="list-style-type: none"> <li>- construct a raised table/junction entry treatment on Arch Street;</li> <li>- re-organise/reconstruct the cycle route at the western end of Rockingham Street;</li> <li>- relocate the 'No Entry' sign on the western side of Rockingham Street;</li> <li>- improve the turning radius/entry treatment at the Rockingham Street/Tiverton Street junction;</li> <li>- reposition the two parking spaces opposite this development on Rockingham Street (works to include road marking and signage), and in connection with this promote a TMO;</li> <li>- install a loading bay on Tiverton Street;</li> <li>- repave/relay the footways and kerbing (including the elimination of three redundant vehicle crossovers):</li> </ul>

	<ul style="list-style-type: none"> <li>• to the front of the site along Rockingham Street and Tiverton Street;</li> <li>• along Tiverton Street towards Newington Gardens; and</li> <li>• along Arch Street;</li> </ul> <ul style="list-style-type: none"> <li>- refresh road markings following kerb installation;</li> <li>- provide a dropped kerb for refuse bins access;</li> <li>- upgrade street lighting to current standards; and</li> <li>- repair any damage to the highway (including any inspection covers and street furniture) due to construction activities for the development including construction work and the movement of construction vehicles.</li> </ul>
	Applicant's Position: <b>Agreed</b>
BOROUGH ROAD NETWORK: S278 AGREEMENT DEADLINE	Prior to commencement of the agreed highway works, the developer is to enter into a Highway Agreement under Section 278 (and Section 38).
	Applicant's Position: <b>Agreed</b>
BOROUGH ROAD NETWORK: S278 WORKS DELIVERY	All works agreed under the Highway Agreement shall be completed within the agreed timeframe.
	Applicant's Position: <b>Agreed</b>
BOROUGH ROAD NETWORK: S278 DETAILED DESIGN	<p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to submit the 'Highway Works Specification and Estimated Costs' for approval.</p> <p>Prior to Implementation, an Approval in Principle (AIP), relating specifically to the basement element of the proposed development, shall be submitted to and received approval from the Council (specifically the Local Planning Authority, in liaison with Council's Highways Structures Team).</p>
	Applicant's Position: <b>Agreed</b>
PARKING PERMIT ELIGIBILITY EXCLUSION	All future occupiers shall be prohibited from being eligible for CPZ parking permits.
	Applicant's Position: <b>Agreed</b>
<b>Energy and sustainability</b>	

<p>FUTURE-PROOFED CONNECTION TO DISTRICT CHP</p>	<p>Prior to occupation, a CHP Energy Strategy must be approved setting out how the development will be designed and built so that all parts of it will be capable of connecting to any future District CHP.</p> <p>Applicant's Position: <b>Agreed</b></p>
<p>CARBON OFFSET PAYMENT 1</p>	<p>The development as built is to achieve the carbon reduction set out in the submitted Application Stage Energy Strategy.</p> <p>Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer shall pay an off-site contribution of 50% of the total application stage predicted carbon shortfall (34.06 tonnes/CO<sub>2</sub>). This equates to 17.03 tonnes/CO<sub>2</sub>. Calculated applying the Council's current tariff rate of £95/tonne for 30 years, this is <b>£48,540.00</b> (index linked).</p> <p>Applicant's Position: <b>Agreed</b></p>
<p>CARBON OFFSET PAYMENT 2</p>	<p>No later than 4 weeks following occupation of the development, the owner shall submit an Occupation Stage Energy Strategy to the Council for approval.</p> <p>The Occupation Stage Energy Strategy shall demonstrate how the development will achieve the Agreed Carbon Targets in accordance with the principles contained in the Application Stage Energy Strategy.</p> <p>In the event that the Occupation Stage Energy Strategy demonstrates the application stage predicted savings have been met or exceeded, the applicant shall pay the Carbon Green Fund Contribution 2 (thereby fully offsetting the differential between on-site as-built carbon savings and net zero). The sum shall be calculated applying the Council's carbon offset tariff in place at that time. Only following receipt of the Carbon Green Fund Contribution 2 will the Council issue its approval in writing.</p> <p>In the event that the Strategy demonstrates carbon savings greater than the outstanding balance of 34.06 tonnes/CO<sub>2</sub> have been achieved, the developer will be eligible for a proportionate disbursement from the monies paid as part of Carbon Offset Payment 1.</p> <p>In the event that the Occupation Stage Energy Strategy demonstrates the as-built scheme falls short of the application stage predicted savings, the applicant shall accompany their submission with an Energy Strategy</p>

	<p>Addendum setting out additional energy efficiency proposals to achieve the Agreed Carbon Targets. If the Council agrees to the proposed additional measures, the owner shall implement all of the measures within six months of the Council's approval of the Addendum. If the Council and owner cannot come to an agreement on the proposed additional measures, the owner shall pay a further carbon offset contribution (to be calculated applying the Council's carbon offset tariff in place at that time) within 28 days of the Council issuing their request.</p> <p>The Occupation Stage Energy Strategy shall be complied with in completing and occupying the development.</p> <p>Applicant's Position: <b>Agreed</b></p>
<p>REVIEW OF AGREED CARBON TARGETS</p>	<p>On the first and third anniversaries of occupation, the applicant shall submit a Post-Occupation Energy Review verifying that the Agreed Carbon Targets continue to be achieved in the immediate post-occupation period.</p> <p>In the event that the Year 1 Post-Occupation Energy Review and/or the Year 3 Post-Occupation Energy Review reveals the actual post-occupation carbon savings performance of the building to be inferior to the Agreed Carbon Targets, the applicant will be obligated to submit an Energy Strategy Addendum and to follow the same set of steps as detailed in the equivalent 'CARBON OFFSET PAYMENT 2' scenario.</p> <p>Applicant's Position: <b>Agreed</b></p>
<p>BE SEEN MONITORING</p>	<p>Within 8 weeks of the grant of the planning permission, the owner shall submit to the GLA and the Council accurate and verified estimates of the 'Be Seen' energy performance indicators.</p> <p>Prior to occupation of the development the owner shall provide to the GLA and the Council updated accurate and verified estimates of the 'Be Seen' energy performance indicators.</p> <p>On the first anniversary of occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following four years after that date, the Owner shall submit to the GLA accurate and verified annual in-use energy performance data for all relevant indicators.</p> <p>In the event that the 'in-use stage' evidence shows that the 'as-built stage' performance estimates have not been or</p>

	are not being met, the owner shall identify the causes of underperformance and the potential mitigation measures. The owner shall submit to the GLA and the Council a Be Seen Mitigation Measures Plan comprising of measures that are reasonably practicable to implement, along with a proposed timescale for implementation. The measures shall be implemented in accordance with the approved Be Seen Mitigation Measures Plan.
	Applicant's Position: <b>Agreed</b>
<b>Administration</b>	
<b>Monitoring</b>	Payment to cover the costs of monitoring these necessary planning obligations (with the exception of those that have monitoring contributions already factored-in), calculated as 2% of total sum.
	Applicant's Position: <b>Agreed</b>

517. In the event that a satisfactory legal agreement has not been entered into by 24<sup>th</sup> October 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 mitigation against the adverse impacts of the development through projects or contributions, contrary to: Policy DF 1 (‘Planning Obligations’) of the London Plan 2021; Policy IP3 (‘Community Infrastructure Levy (CIL) and Section 106 Planning Obligations’) of the Southwark Plan; and the Southwark ‘Section 106 Planning Obligations and Community Infrastructure Levy SPD’ 2015”.*

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

518. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral or Borough CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, while the Borough CIL will provide for infrastructure that supports growth in Southwark.
519. The gross amount of CIL is approximately £1,509,795, consisting of £492,998 Mayoral CIL and £1,016,797 Borough CIL. It should be noted that this is an estimate, and the floor areas on approved drawings will be checked when the related CIL Assumption of Liability Form is submitted, after planning approval has been obtained.

## Community involvement and engagement

520. This application was accompanied by a Statement of Community Involvement, confirming the public consultation that was undertaken by the applicant during the pre-application phase. The table below summarises this consultation:

<b><u>Consultation Undertaken by Applicant: Summary Table</u></b>	
<b><u>Date</u></b>	<b><u>Form of consultation</u></b>
<b>Meetings (Pre-application engagement)</b>	
October 2021	Meeting with the Cabinet Member for the Climate Emergency and Sustainable Development
<b>Public Consultation Events (pre-application phase)</b>	
November 2021	<ul style="list-style-type: none"> <li>• A letter was sent to four key local political and community stakeholders introducing the applicant and inviting them to the 11th November public consultation event.</li> <li>• A flyer was delivered to all 410 addresses at Metro Central Heights, and a pile of flyers was placed at reception.</li> <li>• The same flyer was delivered to 1,969 further residents.</li> <li>• A dedicated consultation website, <a href="http://www.5-9rockinghamstreet.co.uk">www.5-9rockinghamstreet.co.uk</a>, was launched so that residents could learn more about the proposals and provide their feedback.</li> <li>• A letter was sent to the four key local political and community stakeholders, offering a follow-up meeting.</li> <li>• A public consultation event held at “Etc Venues”, 6 Avonmouth St (4-minute walk from the site) between 3:30pm and 6:30pm on 11th November 2021.</li> </ul>
January 2022	<ul style="list-style-type: none"> <li>• A newsletter and invitation to the 13th January public consultation event was delivered to 673 local addresses.</li> <li>• An update was made to the dedicated consultation website, <a href="http://www.5-9rockinghamstreet.co.uk">www.5-9rockinghamstreet.co.uk</a>, so that it contained the latest information about the proposals.</li> <li>• Dedicated online slots were set-up through Eventbrite, for 11th January and 13 January 2022.</li> </ul>



- |  |   |
|--|---|
|  | <ul style="list-style-type: none"> <li>An online (due to COVID-19 restrictions) public consultation event held between 5:30pm and 6:30pm on 13th January 2022.</li> </ul> |
|--|---|

521. Included within the Statement of Community Involvement are the consultation materials that were circulated as part of the pre-application engagement exercise. A summary of each topic raised by the community feedback is also provided, along with details of how the applicant responded.
522. The pre-application consultation undertaken by the applicant was an adequate effort to engage with those affected by the proposals. Due to Covid-19 restrictions that were in place at the time of the second round of pre-application consultation, face to face meetings were not deemed to be suitable in line with national guidance. The 'at a distance' engagement (via postal, virtual and website tools), as detailed in the table above, is considered to be an acceptable engagement method.
523. Although no direct community engagement was undertaken by the application at the planning application stage, following closure of the Council's public consultation process, the applicant prepared a 'response' letter together with additional documentation addressing the matters raised. The extent and format of application stage community engagement is considered adequate.
524. The Council, as part of its statutory requirements, sent letters to surrounding residents, issued a press notice publicising the planning application and displayed notices in the vicinity of the site. Re-consultation letters were issued to all those who commented as part of the original round of consultation. Details of the consultation undertaken by the Council are set out in the appendices. The responses received are summarised earlier in this report.

## **Consultation responses from external consultees**

### Bakerloo Line Extension Safeguarding Unit

525.     • No objection/comments.  
           - **Officer response:** Noted.

### City Airport

526.     • No objection/comments.  
           - **Officer response:** Noted.

### City of London

527.     • Did not wish to comment.

### Civil Aviation Authority

528. • Did not wish to comment.

### Environment Agency

529. • No objection/comments.  
- **Officer response:** Noted.

### Heathrow Airport

530. • Informative relating to Construction Aviation Warning Lights is recommended  
- **Officer response:** The recommended informative has been attached to the draft decision notice.

### Historic England

531. • No objection/comments.  
- **Officer response:** Noted.

### GLA [Stage I response]

#### 532. Retail floorspace

- The Council should seek to restrict the floor area of the flexible retail/service/dining unit to active uses in line with the current submission.
- **Officer response:** A condition to this effect has been included on the draft decision notice.

#### 533. Student accommodation

- The scheme does not meet the strategic London Plan requirement which, along with demonstrating a need for a new PBSA development, is to ensure the accommodation will be supporting London's HEIs.
- **Officer response:** In providing student accommodation within a Major Town Centre that is home to two universities, both within a short walk of the site, and in a location benefiting from a PTAL of 6B that is well connected to other higher education providers in London, it is considered that the proposal would support London's HEIs. The applicant has provided market research suggesting that there is a need for the student housing. An earlier part of this report entitled 'Student accommodation' sets out in detail the evidence of demand for the student housing.
- To follow the Fast Track Route the amount of affordable student accommodation provided should be at least 35% of student bedrooms in the development. If the required threshold for affordable student accommodation is not met, a scheme will be considered under the Viability Tested Route.

- **Officer response:** The applicant is not offering affordable student accommodation as part of the proposal, and therefore has pursued the Viability Tested Route. The GLA's viability team have been involved in the viability negotiations through the course of the planning application process.
- It is expected that the following will be secured by obligation by the time the application has progressed to the Mayor's Stage II decision-making stage:
  - The occupation of the student accommodation would be restricted to full-time students from local HEIs; and
  - A commitment that the majority of the student accommodation (including all affordable bedrooms) would be secured through a nominations agreement for occupation by students of one or more higher educational providers; and that the agreement must be in place from initial occupation; and to commit to have such an agreement for as long as the development is used for student accommodation.
- **Officer response:** While the first of these bullet points would be achieved, the scheme is being put forward by the applicant as 100% direct-let, and as such none of the rooms would be secured under the nominations agreement referred to by the second bullet point. The 100% direct-let model is supported by the policies of the more up-to-date and locally-specific Southwark Plan, and as such the Council considers the development should be exempt from entering into a nominations agreement. The rationale for this is explained in detail in the 'Student accommodation' section of this report.
- Where the majority of the accommodation would not be secured through a nominations agreement, the development would need to be assessed as large-scale purpose-built shared living. When assessed as large-scale purpose-built shared living, the proposal would not conform to the detailed design criteria for amenity space and quality of accommodation
  - **Officer response:** Owing to the supportive position of the Southwark Plan regarding the principle of 100% direct-let PBSA, when assessing whether the accommodation proposed by this planning application would provide adequate functional living space and layout, it is considered appropriate to do so against the standards set by Criterion 5 of Policy H15(A) rather than Policy H16. As set out in the 'Quality of Residential Accommodation' part of this report, the proposed accommodation is considered to be compliant with Criterion 5 of Policy H15(A).
- The applicant should confirm whether it intends to use the accommodation during vacation periods for ancillary uses and this should be appropriately secured through conditions and/or a Section 106 agreement.
  - **Officer response:** For an 11-week period from late June to early September, summer lets will be permitted to part time and full time students from UK registered educational institutions. This will be secured through an obligation in the Section 106 Agreement.

534. Viability

- The applicant must provide information on the overall potential quantum of conventional affordable housing habitable rooms that could be delivered by the off-site contribution
  - **Officer response:** The £8,540,000 could deliver as many as 85.4 habitable rooms of conventional affordable housing. Depending on the effects of inflation between now and the date the final payment-in-lieu instalment is made, the total payment-in-lieu may be more than the inflation-adjusted £8,540,000, and as such the number of habitable rooms that could be delivered may be even higher.
- Both an early and late review mechanism will be required.
  - **Officer response:** Both reviews will be secured through the Section 106 Agreement.

535. Affordability of direct-let student accommodation

- Providers of PBSA should develop models for the delivery of PBSA in London which minimise rental costs for the majority of the bedrooms in the development and bring these rates nearer to the rate of affordable student accommodation.
  - **Officer response:** The proposed development would include range of accommodation typologies such that there would be options accessible to a range of students depending on their financial circumstances. The FVA submitted with the application indicates that rental levels would be in line with those charged by other direct-let schemes locally. All rents would also be inclusive of bills, which provides financial certainty for prospective occupiers.

536. Quality of student accommodation

- GLA is concerned that the function of some of the units could be compromised due to a combination of irregular size and shape. The units are very compact, and it is not apparent that units could all accommodate essential features such as storage, wardrobes and desk space along with the inclusion of kitchen space. The applicant should reconsider the size and internal layout, and convincingly demonstrate that the development meets the Policy H15 requirement to providing adequate functional living space and layout.
  - **Officer response:** Similar concerns were raised by Council officers during the application process. In response, the applicant amended the layouts mid-way through the planning application process to provide more spacious and practical accommodation. Detailed analysis of the finalised accommodation offer is provided in the 'Quality of residential accommodation' section of this report.
- Considerations relevant to unit quality including privacy, ventilation, noise and thermal comfort will also need to be considered at Stage II.

- **Officer response:** Detailed analysis is provided in the 'Quality of residential accommodation' section of this report.
- The internal/communal amenity space is not distributed evenly across all the floor levels.
  - **Officer response:** It is considered that the location of the amenity spaces (in the revised design) is acceptably distributed both at lower levels and upper levels of the building, being split across four different levels. It would allow for different sizes of gatherings and greater flexibility for the use by students.
- Any internal amenity spaces should be secured for use by students only within the S106 agreement.
  - **Officer response:** The use restriction within the Section 106 Agreement will cover the entirety of the student accommodation.

### 537. Design, heritage and tall building considerations

- The proposal must undergo a DRP or demonstrate that it has undergone a local borough process of design scrutiny, based on the principles set out in Policy D4(E).
  - **Officer response:** The proposal was subject to a multiple-stage design scrutiny process from Council planning, urban design and conservation officers. This ran through the pre-application stage and into the planning application process. It is considered that this meets the expectations of Policy D4(E).
- Key design details, for instance review of materials, should be secured as part of any planning application to achieve and maintain the highest design quality, ensuring that the architectural quality and materials remain of an exemplary standard.
  - **Officer response:** Appropriate conditions have been included on the draft decision notice.
- As set out in London Plan Policy D4, the ongoing involvement of the original design team should be conditioned to monitor the design quality through to completion.
  - **Officer response:** The applicant is willing to agree to architect novation.
- The Council should be satisfied that the optimisation of both the application site and the S.A.H site opposite to the northwest can be achieved and that any necessary design mitigation measures are incorporated.
  - **Officer response:** Council officers are satisfied, as explained in the 'Impact of proposal on development potential of nearby land' section of this report.
- The Low Line frontage features (lighting, signage etc.) should be appropriately secured, given their important contribution to the activation

of the Low Line and for surveillance. The mechanism must be robust, given that the arches fall outside of the identified ownership boundary.

- **Officer response:** The scheme of lighting and signage will be secured by way of a 'Railway Arches (External) Works Specification' obligation in the Section 106 Agreement. A similar specification will be included in the Section 106 Agreement for the internal facilities.
- To ensure compliance with London Plan Policies D13 and D14, any required design mitigation measures in respect of noise and vibration should be appropriately secured.
  - **Officer response:** As set out in the 'Noise and vibration' section of this report, conditions are recommended to: limit plant noise; control inter-use noise transfer; require the submission of a vibration and re-radiated noise assessment pre-occupation of the accommodation; and limit the use of the commercial floorspace and any associated outdoor dining furniture to neighbourly hours.
- The applicant should work with the Council to ensure that any aviation or telecommunication impacts arising from the development are suitably addressed and that no significant detrimental effect on solar energy generation on adjoining buildings would result.
  - **Officer response:** Arqiva –the organisation responsible for providing the BBC, ITV and the majority of the UK's radio transmission network, as well as for ensuring the integrity of Re-Broadcast Links– has raised no objection to the proposal. All aviation-related consultees are satisfied that the proposal would cause no impacts.
- GLA officers have identified that there would be less than substantial harm resulting to the setting and significance of the Grade II Metro Central Heights which would need to be weighed against the public benefits of the proposal. The results of the assessment by the Council on the proposal's impact on heritage assets will also be reported to and taken into account by the Mayor at Stage II.
  - **Officer response:** Noted. The Council's heritage impact assessment is set out in detail in the 'Design' section of this report.

#### 538. Inclusive design

- The application as originally submitted proposed that, should there be demand, six wheelchair units could be created by combining two standard studios to become one wheelchair studio. The GLA question how affordable this would be for end disabled users.
  - **Officer response:** The applicant amended the design of the proposal mid-way through the planning application process, which included omitting altogether the proposal for converting side-by-side studios into a single large wheelchair use studio should there be demand. Instead, and as per the 'Quality of residential accommodation' section of this report, the policy requirement for 5% of the bedspaces to be wheelchair homes would be delivered up-front into the form of 13 wheelchair

studios, five to M4(3)(2)(a) equivalent and eight to M4(3)(2)(b) equivalent.

- An accessibility and inclusive design statement should be a planning application submission item, with consideration given to Part B of Policy D5 and supporting paragraph 3.5.3. Although this has not been provided, GLA officers are generally satisfied that the information provided throughout the submission is proportionate as GLA officers do not anticipate any further adverse impacts with regards to inclusive access would arise as a result of the development.
  - **Officer response:** Noted. No further information will be sought from the applicant by condition or obligation.
- The Council should secure the accessible bedrooms by condition.
  - **Officer response:** A condition to this effect is included on the draft decision notice.

#### 539. Public realm

- The management and maintenance of the public realm, which must be in accordance with the Public London Charter LPG, should be appropriately secured.
  - **Officer response:** A Public Realm Management Plan will be secured through the Section 106 Agreement.

#### 540. Digital connectivity

- The Council should ensure provision of sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s capable connection is made available to all end users.
  - **Officer response:** A digital connectivity strategy is to be required by condition.

#### 541. Fire safety

- The applicant's Fire Strategy does not provide the level of detail required to satisfy the requirements of London Plan Policies D5, D12(B) and the recently published draft Fire Safety Guidance. A revised fire statement should be submitted and secured by condition, and fire evacuation lift(s) should be secured by condition.
  - **Officer response:** Further information has since been prepared and submitted by the applicant. This has been reviewed by the HSE, who are satisfied that fire safety considerations from a planning perspective have been fully addressed. Compliance with the applicant's Fire Strategy will be secured by condition; this is considered sufficient to ensure the fire evacuation(s) are retained and used for this purpose for the lifetime of the development.

#### 542. Wind microclimate

- In terms of the wind environment, impacts to the surrounding public realm and streets must be carefully considered and where necessary, mitigation measures incorporated into the design and secured by the Council.
  - **Officer response:** The applicant's Wind Microclimate Report finds that no wind or microclimate mitigation measures would be required and wind conditions surrounding the proposed development would be suitable and safe for the intended use or no worse than in the baseline scenario.

#### 543. Air quality

- Conditions should be imposed, requiring on-site plant and machinery to comply with LRMM Low-Emission Zone standards, and measures to control emission during the construction phase should be included in the Air Quality and Dust Management Plan (AQDMP) or Construction Environmental Management Plan.
  - **Officer response:** These requirement will be secured through the Final Construction Environmental Management Plan. The AQDMP will form an integrated part of the latter.

#### 544. Transport

- Transport comments as per TfL's sent under separate cover.
  - **Officer response:** See comments, and officer response where relevant, under the 'Transport for London (TfL)' bullet point below.

#### 545. Energy and carbon reduction

- The applicant is required to submit additional energy information, regarding: 'be lean' measures and efficiencies; energy costs to consumers; overheating and active cooling; further information on potential for connection to district heating and future-proofing; further information on the ASHP; reconsideration of PV potential; and 'be seen' monitoring. Once this additional information has been provided the applicant must confirm the carbon shortfall in tonnes CO<sub>2</sub> and the associated carbon offset payment that will be made to the borough.
  - **Officer response:** The applicant has submitted the requested additional information, which the Council considers to be adequate. Liaison has also taken place with the GLA, as a result of which the Energy Statement has been updated to include changes such as omitting cooling loads associated with the student rooms and the inclusion of photovoltaic panels on the roof. The final agreed version of the Energy Statement is V08 dated 13.03.2023. A contribution towards the Carbon Green Fund will be secured through the Section 106 Agreement. With regards to energy costs, rooms are let for an academic year, and the fuel costs would be included within the rent agreement which is fixed for each academic year; any increase in fuel cost would be met by the accommodation provider.



- Confirmation that that commercial element should be included within the energy statement and reported CO2 emissions.
  - **Officer response:** The applicant's updated energy statement (V08 dated 13.03.2023) confirms that the commercial space has been included. The emissions from this space have a minimal impact on the overall building emissions.
- Matters identified in the GLA Energy Memo should be resolved in discussion with GLA officers prior to the Council's determination of the scheme.
  - **Officer response:** Since receipt of the GLA Stage I response, the applicant has liaised with the GLA's Energy division regarding memo. It is understood that the memo now meet's the GLA's requirements.

#### 546. Whole life cycle and circular economy

- A fully completed GLA WLC template should be submitted as an Excel document, and a post-construction assessment report on the development's actual WLC emissions should be secured by condition.
  - **Officer response:** The applicant has submitted the requested Excel document, and a planning condition is recommended with regard to WLC reporting.
- On circular economy, the applicant should provide additional information regarding matters such as the bills of materials and end-of-life strategy.
  - **Officer response:** The applicant has submitted the requested items, and a planning condition is recommended with regard to circular economy reporting.

#### 547. Urban greening

- More information is required to determine whether the scheme's UGF score is compliant, namely:
  - Confirmation whether the existing vegetation east of the railway within the site boundary, categorised in the applicant's UGF calculation as semi natural vegetation, would be retained and managed as semi natural vegetation in the long term. It is noted that the management plan sets out the need for plug planting new plants in this area which appears contradictory;
  - Why it is not possible to increase the proportion of the roof space covered by a green roof.
  - Confirmation whether the proposed climbers on the north-eastern facing facades are realistic, given the low light levels due to the orientation and adjacent railway that would cause shading; and
  - A review to confirm whether additional planting could be included at ground level.
- **Officer response:** Mid-way through the planning application process, the applicant made revisions to the roof plan and maintenance access to enable the provision of 39 square metres of extensive green roof. In addition, to maximise the planting at ground level, 5 planting boxes

would be added to the eastern side of the passageway – four in front of the northern arch, one in front of the southern. These changes had the effect of increasing the UGF from 0.14 to 0.18. The applicant has addressed this in detail in their Design and Access Statement Addendum (received 14th July 2022). The planting species proposed are suitable for growing conditions with lower levels of sunlight, and final details / species are to be secured by planning condition.

- The applicant should seek to maximise all potential options for additional greening
  - **Officer response:** As set out in the ‘Urban Greening’ section of this report, it is considered that greening opportunities have been exhausted. A planning condition is recommended to ensure the scheme as built would achieve the score.

#### 548. Flood risk and drainage

- The Flood Risk Assessment requires amendments to give appropriate regard to emergency planning and flood resistance/resilience measures due to the risk of tidal/reservoir breach flooding at the site (in particular to protect sensitive plant and to provide a safe haven on the upper floors).
  - **Officer response:** The applicant has submitted an updated Flood Risk Assessment to address these points, and the GLA will be able to comment again on this as part of the Stage 2 process.
- The extents of green/blue roofs should be indicated on a plan
  - **Officer response:** The roof plan was amended in July 2022 to respond to this issue. The amended roof plan incorporates green roof of a total coverage of 39 square metres. The applicant contends that this is the maximum coverage possible due to the available space at roof level needing to accommodate ASHP, photovoltaics, retail outdoor VRF units, smoke fans, a back-up supply generator and the access hatch, while also maintaining a façade maintenance zone around the perimeter of the roof. The UGF has been calculated assuming 39 square metres of green roof. The Council’s Flood Risk Management Team has agreed in liaison with the applicant to allow a plan indicating the extent of green/blue roofs to be submitted for approval post-decision.
- The provision of a Flood Warning and Evacuation Plan should be secured by condition.
  - **Officer response:** This will be secured by condition.
- A covenant should be placed over the ground floor areas to prevent any future use for sleeping accommodation.
  - **Officer response:** This will be secured in the Section 106 Agreement.
- An assessment of exceedance flood flow routes above the 100-year event plus 40% climate change should be provided.

- **Officer response:** This information was supplied by the applicant mid-way through the planning application process in the form of a SuDS proforma; it has been assessed and deemed acceptable by the Council's Flood Risk Management Team.
- With regard to water efficiency, a rainwater harvesting system should be proposed and water efficient features (meters, leak detection systems, and greywater harvesting) should also be considered.
  - **Officer response:** A rainwater harvesting system had been considered by the applicant, but it was discounted due to limited space and depth, as well as the need for excessive pumping. The Council's Flood Risk Management Team has been willing to accept this justification for non-provision. The GLA will be able to comment again on this as part of the Stage 2 process. Water efficiency features have been incorporated.

### Health and Safety Executive (Fire Risk Unit)

549. • Following a review of the information provided with this consultation, HSE is satisfied with the fire safety design, to the extent that it affects land use planning.
- **Officer response:** Noted.

### London Borough of Lambeth

550. • Did not wish to comment.

### London Fire Brigade

551. • No objection/comments.
- **Officer response:** Noted.

### London Underground

552. • No objection/comments.
- **Officer response:** Noted.

### Metropolitan Police

553. • No objection subject to a two part 'Secured by Design' condition being applied.
- **Officer response:** The suggested condition has been included on the draft decision notice.

### Natural England

554. • No objection/comments.
- **Officer response:** Noted.

## Network Rail

555. • Comments, but no objections or recommended conditions/informatives.  
 - **Officer response:** Noted.

## Thames Water

556. • A Piling Method Statement must be secured by condition, along with plans setting out how additional water flows will be accommodated. Some informatives are recommended  
 - **Officer response:** Noted. The recommended conditions and informatives have been attached to the draft decision notice.

## Transport for London (TfL)

### 557. Financial contributions

- The applicant is expected to enter into a nominations agreement. Should this happen, given the nature of the development and the potential impacts on Elephant and Castle Underground Station, a contribution would be requested towards the upgrade of this station on a pro rata basis related to other schemes not eligible for the borough CIL payment.  
 - **Officer response:** For all of the reasons set out in earlier parts of this report, no nominations agreement will be entered into. As a 100% direct-let scheme, the proposal would be liable for borough CIL, which could be used to contribute towards local transport improvements.
- £16,000 should be secured for Legible London signage, as should £100,000 for investment in ongoing management of Santander docking stations in the local area.  
 - **Officer response:** Both of these contributions would be secured through the Section 106 Agreement.

### 558. Servicing

- No assessment of the servicing trip rate for the retail use has been provided. Survey data from before COVID is likely to be out of date because of the significant growth in online ordering. This should be considered when assessing and mitigating the impact of the proposals.  
 - **Officer response:** As confirmed by the applicant in commentary supplied post receipt of the GLA's Stage response (Transport Note, dated 1<sup>st</sup> September 2022), the servicing demand for the flexible commercial unit on-site is anticipated to generate 1-2 deliveries per day, based on the servicing demand trip rates determined by the City of London within their Loading Bay Ready Reckoner. This trip rate is considered to apply most suitably to small retail units. In the aforementioned Transport Note the applicant says "this is a sensible estimate for servicing demand, as opposed to a prorated trip rate from

the TRICS database for retail, which would be typically based on a larger unit/retail park setting”, which the Council’s Transport Policy Team has raised no objection to.

- Smaller electric vans and cargo bikes, which are better suited to the constrained road network in this area, should be utilised.
  - **Officer response:** The applicant contends that there is no opportunity to force deliveries to the site to be undertaken by certain vehicles types. The Council recognises that ad hoc deliveries are inherently difficult to control. In the applicant’s Transport Note, dated 1st September 2022, they say “sustainable deliveries will be targeted where possible”.
- Given the narrow road width on this section of Tiverton Street, there is concern that servicing activity could impact upon pedestrian and cyclist safety and traffic flows along Tiverton Street, contrary to Vision Zero. Further information is required and mitigation.
  - **Officer response:** The proposed servicing arrangements match those consented under 19/AP/0750. The 22/AP/1068 proposal will create an open area of public realm adjacent to the proposed servicing location, as the route along the Low Line is opened up to create public realm space and a new pedestrian route. It is considered that this represents reasonable mitigation, and will provide a safe environment for pedestrians and cyclists.
- Controls on servicing to avoid times when there are many pedestrians and cyclists in the area should be imposed and consideration given to only night time/early morning activity.
  - **Officer response:** Servicing hours will be controlled by condition.

#### 559. Cycle storage and footways

- The long-stay cycle parking needs amending to bring it in line with LCDS standards (aisle widths, spacings, provision of gullies on staircases, provision of two exit points from the stores for personal safety reasons etc). Design amendments should be secured prior to determination to ensure that fully policy compliant cycle parking is capable of being delivered.
  - **Officer response:** It is considered that these details can be secured by way of a Section 106 Agreement obligation.
- The short-stay cycle parking has been proposed on the footway of Rockingham Street, which is outside of the site boundary. As Rockingham Street is a borough highway, the location of short stay cycle parking should be agreed with the Council.
  - **Officer response:** The location is considered acceptable.
- Given that Rockingham Street will have a high pedestrian footfall, a wider pedestrian width than the minimum 2 metres in TfL’s Streetspace design guidance may be appropriate.

- **Officer response:** At the pinch point, the distance between the Sheffield stands and the kerb would be 2.4 metres. When a cycle is parked in the stand, this would reduce the effective width to approximately 2.0 metres. This is relatively narrow but, as the effective width between the stands and the kerb would be wider further to the northwest, on balance it is considered acceptable.

#### 560. Student move-ins and move-outs

- The move-in and move-out plan must require coordination of arrangements with other student residences in the area so as to avoid overload at peak move in and move out times with resultant impacts on safety, comfort and convenience of pedestrians and cyclists and others living, working and visiting the area. This information has not been provided. Prior to determination, an updated framework plan should be submitted with the full plan secured by condition.
  - **Officer response:** As explained in the applicant's Transport Assessment, when vehicle use is required for move-in, the drop-off point would be the section of single yellow line kerbside adjacent to the Site on Tiverton Street. As move-in slots will be allocated, this will enable the management of all movements to prevent the blocking and stacking of vehicles on Tiverton Street. A Final Student Management Plan will be secured in the Section 106 Agreement; the obligation wording will make specific reference to coordination with other student residences locally.

#### 561. Car parking

- The proposed one accessible parking space should have electric vehicle charging facilities.
  - **Officer response:** A condition requiring an EVCP for the parking space has been included on the draft decision notice. This would need to be delivered as part of the Section 278 works or an alternative fully-funded Local Highways Authority arrangement.
- To compensate for only being able to provide an on- rather than off-street wheelchair parking space, improved and increased provision to facilitate travel for disabled residents by other modes should be provided.
  - **Officer response:** In accordance with the findings of the Active Travel Audit, a series of improvements to the local footway environment are proposed; these will facilitate travel to and from the site for disabled residents, providing improved means of access to sustainable modes of transport.

#### 562. Construction environmental management and logistics

- Controls should be placed on vehicle movement to avoid times when there are many pedestrians and cyclists in the area should be imposed and consideration given to only night time/early morning activity.

- **Officer response:** This can be controlled through details secured in the Final Construction Environmental Management Plan.
- The developer must commit to join the Elephant and Castle Development Cooperation Group.
  - **Officer response:** This will be required in the full Construction Logistics Plan.
- Given that local roads are not suitable for HGVs it should be demonstrated that their use is limited to only essential movements and how the safety and comfort of pedestrians and cyclists would be maintained.
  - **Officer response:** This will be required in the full Construction Logistics Plan.

### 563. Documentation

- A Final Travel Plan, Final DSP and Construction Logistics Plan should be secured by condition.
  - **Officer response:** The suggested conditions have been included on the draft decision notice.

### Tower Hamlets Council

564. • Did not wish to comment.

### UKPN

565. • Did not wish to comment.

### Westminster Council

566. • Did not wish to comment.

## **Community impact and equalities assessment**

567. 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.
568. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
569. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
570. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. The positive impacts have been identified throughout this report. They include:
- Accessible accommodation: 5% of the studios would be wheelchair accessible, as would all of the ancillary and common spaces within the student housing scheme. One wheelchair parking space would also be provided.
  - Employment and training opportunities: Local unemployed people would benefit from jobs and training opportunities connected with the construction stage.
  - Improved and more accessible public realm: The proposed public realm at the base of the building and along the new Low Line section, as well as the agreed improvements to footways and highways within the vicinity of the site, would all be designed to assist people with mobility impairments. Physical measures such as level or shallow gradient surfaces and dropped kerbs would benefit disabled and older people in particular.
  - Public safety: Safer public spaces (through the various proposed active and passive security and surveillance measures) would benefit all groups, but in particular older people, disabled people and women. The cycle store within the southern railway arch has been designed with sight lines from the student housing reception and a lobby to prevent tail-gaiting, complemented by CCTV surveillance.
571. 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.

## **Human rights implications**



572. 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.
573. This application has the legitimate aim of redeveloping the site for a new 24-storey building with rooftop plant, containing a student accommodation and flexible commercial uses, together with public realm improvements and other associated works. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

<b>Positive and proactive engagement: summary table</b>	
Was the pre-application service used for this application?	YES
If the pre-application service was used for this application, was the advice given followed?	YES
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	YES

## **CONCLUSION**

574. This application would bring into productive and optimised re-use this brownfield and underutilised site, providing a complementary mixture of student housing and retail uses that would support the role and vibrancy of the Central Activities Zone and the Elephant and Castle Major Town Centre, while also activating a short stretch of the Low Line.
575. There is support in the London Plan and Southwark Plan for student housing, which helps to release local family housing and is counted towards the borough's housing delivery. Located very close to two universities and with strong transport connections to other HEIs in the borough and London, the site is considered to be appropriate for student accommodation, meeting a demonstrable need and achieving compliance with the requirements of Southwark Plan Policy P5.
576. The proposal would be a direct-let scheme and would not include any affordable student rooms. As no conventional affordable housing is proposed within the redevelopment, a payment-in-lieu is proposed of £8,540,000 (index-linked), which equates to 35% affordable housing by habitable room, with the applicant offering to 'collar' this so that, at the time it the final instalment is made, the payment-in-lieu would be no less than £11,161,826. The payment-in-lieu could potentially be used to directly support the delivery of affordable housing close to the application site. The payment-in-lieu is therefore considered to be a substantial benefit of the application.

577. The design of the proposed development evolved as a result of officer scrutiny throughout the pre-application phase, with further refinement during the planning application stage. The softening and sculpting effect of the rounded corners, the coloured mix of brick and variety in detailing, the defined 'top' and 'base' resulting from the horizontal banded finish, and the cantilevered upper levels combine into an exemplary standard of architecture. The façade design is reflective of the building's significance as a tall rather than a landmark building in this Opportunity Area location, contributing positively to the local townscape. Through optimised active frontages and the delivery of a new section of the Low Line, the development would provide an engaging and animated building at street level. Although the UGF score would fall short of the 0.4 policy requirement, within the constraints of the site all opportunities for greening have been exhausted. In summary, the proposed building would comply with all aspects of the tall building policy, while also making a public space contribution commensurate with the small site area.
578. The impacts on neighbours' amenity have been assessed and, while it is recognised that for some properties the daylight and sunlight losses would exceed the BRE guidelines, they are very similar in their extent and magnitude to the impacts caused by the previous/implemented planning permission. There have been a number of objections to the proposal as referenced in this report. Nevertheless the impacts are not considered to be significantly harmful, especially in view of the site's location, and would not warrant refusal of the application.
579. Transport matters, including those of particular concern to objectors such as the move-in and move-out process, have been satisfactorily addressed by the application documents, with detailed arrangements and mitigation to be secured through planning conditions and obligations. Although the long- and short-stay cycle parking would comply with the London Plan, it would not meet the more onerous requirements of the Southwark Plan. However, it is considered that the on-site provision of free-of-charge Brompton-style lockers and the £100,000 contribution towards TfL cycle docks locally make for acceptable mitigation in this instance.
580. Subject to compliance with the detailed energy and sustainability strategies submitted and payment of the Carbon Green Fund, the development satisfactorily addresses climate change policies.
581. In line with the requirements of the NPPF, the Council has applied the presumption in favour of sustainable development. The proposal would accord with sustainable principles and would make efficient use of a prominent vacant brownfield site to deliver a high quality development that is in accordance with the Council's aspirations for the area. It is therefore recommended that planning permission is granted, subject to conditions as set out in the attached draft decision notice, referral to the GLA, and the timely completion of a Section 106 Agreement.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: 1421-7 Application file: 22/AP/1068 Southwark Local Development Framework and Development Plan Documents	Planning Division, Environment, Neighbourhoods & Growth Department 160 Tooley Street, London, SE1 2QH	<ul style="list-style-type: none"> <li>• Planning enquiries telephone: 020 7525 5403</li> <li>• Planning enquiries email: <a href="mailto:planning.enquiries@southwark.gov.uk">planning.enquiries@southwark.gov.uk</a></li> <li>• Case officer telephone: 020 7525 5535</li> <li>• Council website: <a href="http://www.southwark.gov.uk">www.southwark.gov.uk</a></li> </ul>

## APPENDICES

No.	Title
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>	Patrick Cronin, Team Leader	
<b>Version</b>	Final	
<b>Dated</b>	13 April 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 & Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Date final report sent to Constitutional Team		13 April 2023

**SOUTHWARK COUNCIL**

Town and Country Planning Act 1990 (as amended)

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

[www.southwark.gov.uk](http://www.southwark.gov.uk)

**DRAFT DECISION NOTICE**

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**LBS Reg. No.:** 22/AP/1068

**Date of Issue of Decision:** N/A

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Applicant Alumrose LLP and JH Rockingham Ltd

**Planning permission is GRANTED WITH LEGAL AGREEMENT for the following development:**

Redevelopment of site to provide a 24 storey building plus basement consisting of purpose built student accommodation (Sui Generis), and commercial uses (Use Class E) at ground floor, and the development of the associated railway arches to provide commercial space (Use Class E), plant, refuse and cycle storage, and associated access and public realm works.

at

5-9 Rockingham Street, Southwark, London, SE1 6PF

In accordance with the valid application received on 22 March 2022 and supporting documents submitted which can be viewed on our Planning Register.

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

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

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## Conditions

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

1. The development shall be carried out in accordance with the submitted plans and documents.

REASON:

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

### Permission is subject to the following Time Limit:

2. TIME LIMIT AND QUANTUM OF USES

Permission is hereby granted for a 24-storey building with additional rooftop plant (70.67 metres above ground level, 73.14 metres above Ordnance Datum) and a further single-storey basement, together with the redevelopment of the three adjacent railway arches, comprising:

- 24-storey building plus basement and mezzanine consisting of purpose-built student accommodation (Sui Generis) comprising 244 bedrooms;
- 67 square metres of flexible commercial floorspace (Use Class E [a], [b] and [c]);
- public realm improvements; and
- other associated works incidental to the development.

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

REASON:

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

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

3. CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Prior to the commencement of any development hereby consented, a written Construction Environmental Management Plan (CEMP) shall be 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:

- a detailed specification of construction works at each phase of development including consideration of all environmental impacts and

the identified remedial measures;

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

- Southwark Council's 'Technical Guide for Demolition & Construction' at <http://www.southwark.gov.uk/construction>;
- Section 61 of Control of Pollution Act 1974;
- the London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition';
- the Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites';
- BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Noise';
- BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration';
- BS 7385-2:1993 'Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration';
- BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting';
- relevant EURO emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended and NRMM London emission standards (<http://nrmm.london/>);
- the Party Wall Act 1996;
- relevant CIRIA practice notes; and
- BRE practice notes.

All 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: the National Planning Policy Framework 2021; Policies GG3 (Creating a Healthy City), D14 (Noise) and T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policies P45 (Healthy Developments), P50 (Highways Impacts), P62 (Reducing Waste), P65 (improving Air Quality), P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

#### 4. CONSTRUCTION LOGISTICS PLAN

Prior to the commencement of any development hereby consented, a Construction Logistics Plan developed in liaison with Transport for London to manage all freight vehicle movements to and from the site shall be submitted to and approved by the Local Planning Authority.

The Construction Logistics Plan shall:

- identify all efficiency and sustainability measures that will be taken during the development;
- make commitments where reasonably practicable to smart procurement and collaboration (e.g. sharing suppliers) to minimise the number of construction vehicle trips; and
- demonstrate how deliveries to the development through sustainable modes of transport, such as smaller electric vehicles and cargo, will be maximised.

The development shall not be carried out other than in accordance with the approved Construction Logistics Plan 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; Policies GG3 (Creating a Healthy City), D14 (Noise), T6 (Assessing and Mitigating Transport Impacts) and T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policies P45 (Healthy Developments), P50 (Highways Impacts), P65 (Improving Air Quality) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

#### 5. SITE CONTAMINATION

a) Prior to the commencement of any development hereby consented (including any works of demolition and site clearance), a 'Phase 1 Desktop Study' of the historic and current uses of the site and adjacent premises as well as a 'Preliminary Risk Assessment' including:

- a site walkover survey;
- identification of contaminants of the land and controlled waters;

- a conceptual model of the site; and
- a conclusion and recommendations as to whether a Phase 2 intrusive investigation is required;

shall be submitted to and approved in writing by the Local Planning Authority.

b) If the Phase 1 site investigation reveals possible presence of contamination on or beneath the site or controlled waters, prior to the commencement of any development an 'Intrusive Site Investigation and Risk Assessment' fully characterising the nature and extent of any contamination of soils and ground water on the site, shall be submitted to and approved in writing by the Local Planning Authority.

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' including:

- 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; and
- confirmation that, as a minimum, the site shall 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;

shall be submitted to and approved in writing by the Local Planning Authority.

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 and/or Mitigation Strategy', a 'Verification Report' providing evidence that all required remediation works 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 and/or Mitigation Strategy' and (if required) a 'Verification Report' 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 National Planning Policy Framework 2021; and Policy P64



(Contaminated Land and Hazardous Substances) of the Southwark Plan 2022.

6. ARCHAEOLOGICAL EVALUATION

Prior to the commencement of any development hereby consented (including any works of demolition and site clearance), 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 applicant supplies the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with: the National Planning Policy Framework 2021; and Policy P23 (Archaeology) of the Southwark Plan 2022.

7. ARCHAEOLOGICAL FOUNDATION AND BASEMENT DESIGN

Prior to the commencement of any development hereby consented (with the exception of demolition to basement level, archaeological evaluation and site investigation works), 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 in writing by the Local Planning Authority. The submitted document(s) shall demonstrate that 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 details of the basement, foundations and all below ground impacts of the proposed development are known and an appropriate protection and mitigation strategy is achieved to preserve archaeological remains by record and/or in situ, in accordance with: the National Planning Policy Framework 2021; and Policy P23 (Archaeology) of the Southwark Plan 2022.

8. ARCHAEOLOGICAL MITIGATION

Prior to the commencement of any development hereby consented (with the exception of demolition to ground slab or ground level and archaeological evaluation works), 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: the National Planning Policy Framework 2021; and Policy P23 (Archaeology) of the Southwark Plan 2022.

9. DIGITAL CONNECTIVITY INFRASTRUCTURE STRATEGY

Prior to the commencement of any development hereby consented (with the exception of demolition and site clearance), 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 the development. The development shall be carried out in accordance with the approved plans and maintained as such in perpetuity.

REASON:

To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness, in accordance with: the National Planning Policy Framework 2019, and; Policy SI 6 (Digital Connectivity Infrastructure) of the London Plan 2021.

10. PILING METHOD STATEMENT

No piling shall take place other than with the Local Planning Authority's written approval of a Piling Method Statement, in consultation with Thames Water.

The Piling Method Statement shall detail the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works.

Any piling shall be undertaken in accordance with the terms of the approved Piling Method Statement.

REASON:

In the interests of protecting key water supply assets having regard to the close proximity of the proposed development to, and thus its potential impact on, underground water utility infrastructure, in accordance with: the National Planning Policy Framework 2021; and Policy SI5 (Water Infrastructure) of the London Plan 2021.

## 11. PROTECTION FROM VIBRATION AND RE-RADIATED NOISE

Following piling but prior to commencement of above ground construction of the development hereby consented, an Assessment of Vibration and Re-radiated Noise shall be submitted to and approved in writing by the Local Planning Authority.

The Assessment of Vibration and Re-radiated Noise shall include measurement of vibration on in-situ piles, and shall include a Scheme of Mitigation as necessary to ensure that residential occupants shall not be exposed to vibration in excess of 0.13 m/s VDV during the night-time period of 23.00 - 07.00hrs or re-radiated noise in excess of 35dB LASmax.

### REASON:

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise, in accordance with: the National Planning Policy Framework 2021; Policy D14 (Noise) of the London Plan 2022; and Policies P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

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

## 12. FINAL SURFACE WATER DRAINAGE STRATEGY

Before any above grade work hereby consented begins (with the exception of demolition), a Final Surface Water Drainage Strategy shall be submitted to and approved in writing by the Local Planning Authority.

The Final Surface Water Drainage Strategy shall be based on the principles of the application-stage strategy (as set out in Flood Risk Assessment and Drainage Strategy V2 [ref: 2021007-S-REP002 Rev P6] prepared by CRE8 Structures, dated 24th May 2022) and shall:

- contain full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS), including detailed design, size and location of attenuation units as well as details of flow control measures;
- contain blue-green roof drawings at detailed design stage showing exact layout and format;
- include greenfield calculations for the site, to be calculated using the whole site area, as well as calculations for the proposed network incorporating the whole site area;
- demonstrate that a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance;
- demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows.

The site drainage shall be constructed to the details set out in the approved Final Surface Water Drainage Strategy.

REASON:

To minimise the potential for the site to contribute to surface water flooding, in accordance with: the National Planning Policy Framework 2021; Policy SI13 (Sustainable Drainage) of the London Plan 2021; and Southwark's Strategic Flood Risk Assessment 2017.

### 13. HARD AND SOFT LANDSCAPING

Before any above grade work hereby consented begins (with the exception of demolition), detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, surfacing materials of access, pavements and edgings and details of any planters and greening of plant enclosures), together with details of the green trellises including a strategy for their continued maintenance and irrigation, shall be submitted to and approved in writing by the Local Planning Authority.

The planting 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)'.

Prior to first occupation of any part of the development hereby approved, the green trellises shall be installed strictly in accordance with the approved details and shall be maintained in accordance with the approved details thereafter.

REASON:

In order that the Local Planning Authority may be satisfied with the details of the landscaping scheme, and to ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity, 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; and Policies P13 (Design of Places), P14 (Design Quality), P56 (Protection of Amenity), P57 (Open Space), P59 (Green Infrastructure)

and P60 (Biodiversity) of the Southwark Plan 2022.

#### 14. GREEN ROOFS

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

#### REASON:

To ensure the development provides the maximum possible provision towards greening, in turn helping to create and foster habitats and valuable areas for biodiversity, in accordance with: the National Planning Policy Framework 2021; Policies G1 (Green Infrastructure), G5 (Urban Greening) and G6 (Biodiversity and Access to Nature) of the London Plan 2021; and Policy P60 (Biodiversity) of the Southwark Plan 2022.

#### 15. BAT TUBES

Before any above grade work hereby consented begins (with the exception of demolition), details of bat tubes shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the exact location, specification and design. In total across the development, no fewer than six bat tubes shall be provided.

Prior to the first occupation of the building, the bat tubes shall be installed strictly in accordance with the details so approved. Once completed, all the approved habitats shall be maintained as such thereafter.

#### REASON:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: the National Planning Policy Framework 2021; Policies G1 (Green Infrastructure), G5 (Urban Greening) and G6 (Biodiversity and Access to Nature) of the London Plan 2021; and Policies P59 (Green

Infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

## 16. SWIFT NESTING FEATURES

Before any above grade work hereby consented begins (with the exception of demolition), details of Swift nesting bricks shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the exact location, specification and design. In total across the development, no fewer than twelve Swift bricks shall be provided.

Prior to the first occupation of the building, the Swift bricks shall be installed strictly in accordance with the details so approved. Once completed, all the approved habitats shall be maintained as such thereafter.

### REASON:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: the National Planning Policy Framework 2021; Policies G1 (Green Infrastructure), G5 (Urban Greening) and G6 (Biodiversity and Access to Nature) of the London Plan 2021; and Policies P59 (Green Infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

## 17. SECTION DETAIL-DRAWINGS

Before any above grade work hereby consented begins (with the exception of demolition), section detail-drawings at a scale of 1:5 together with 1:50 scale context drawings through:

- i. Facades (reveals etc.) including:
    - The various brick treatments to the tower;
    - Canopies/awnings;
    - 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. Typical windows;
  - iv. Plant screening/ enclosure;
  - v. Shopfront of the retail/service/dining unit and the student accommodation foyer, including the spandrel panel;
  - vi. Signage zones; and
  - vii. Gates and fencing to all external spaces;
- of the proposal 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 to satisfy the Local Planning Authority that the construction details will achieve a high quality of design and detailing, are suitable in context and are consistent with the consented scheme, in accordance with: the National Planning Policy Framework 2021; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places) and P14 (Design Quality) of the Southwark Plan 2022.

**18. MATERIALS SCHEDULE AND ON-SITE PRESENTATION OF SAMPLES**

Before any above grade work hereby consented begins (with the exception of demolition):

a) the specification of each facing materials to be used in the development hereby approved shall be submitted as part of a Material Schedule to, and thereafter approved in writing by, the Local Planning Authority; and

b) unless otherwise agreed to by the Local Planning Authority, a sample panel of at least 1 square metre in surface area of each external facing materials and surface finishes, with bond and mortar where applicable, to be used in the carrying out of this permission 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 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 these samples will make an acceptable contextual response in material terms, will achieve a high quality of design and detailing, and are consistent with the consented scheme, in accordance with: the National Planning Policy Framework 2021; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places) and P14 (Design Quality) of the Southwark Plan 2022.

**19. NIGHT-TIME VIBRATION DOSE VALUES**

a) Before any above grade work hereby consented begins (with the exception of demolition), an Acoustic Predictions and Mitigation Measures Report shall be submitted to and approved in writing by the Local Planning Authority. This report shall demonstrate that the development has been designed and will be constructed to ensure all habitable rooms in the residential element of the development are not exposed to vibration

dose values in excess of 0.13 m/s during the night-time period of 23.00 - 07.00hrs

b) The development shall be constructed in accordance with the approved Acoustic Predictions and Mitigation Measures Report.

c) Following completion of the development and prior to first occupation of any part, a Validation Test shall be carried out on a relevant sample of premises, and the Validation Test shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be permanently maintained as such thereafter.

REASON:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess vibration from transportation sources in accordance with: the National Planning Policy Framework 2021; Policy D14 (Noise) of the London Plan 2022; and Policies P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

## 20. SECURED BY DESIGN

a) Before any above grade work hereby consented begins (with the exception of demolition), details of security measures (specified to achieve the 'Secured by Design' accreditation award from the Metropolitan Police) shall be submitted to 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.

b) Prior to the first occupation of the development hereby approved, confirmation that Secure by Design certification has been achieved shall be submitted to and approved in writing by the Local Planning Authority.

REASON:

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

## 21. WHEELCHAIR USER STUDENT BEDROOMS

Before any above grade work hereby consented begins (with the exception of demolition), the applicant shall submit written confirmation from the appointed building control body that the standards in the Approved Document M of the Building Regulations 2015 (as amended)



would be met in respect of the student accommodation units listed below.

Unless otherwise agreed in writing with the Local Planning Authority, the student bedrooms constructed as M4(3)(2)(a) 'wheelchair adaptable' equivalent shall be:

- Level 16: Unit RK.121
- Level 17: Unit RK.121
- Level 18: Unit RK.121
- Level 19: Unit RK.121
- Level 20: Unit RK.121

Unless otherwise agreed in writing with the Local Planning Authority, the student bedrooms constructed as M4(3)(2)(b) 'wheelchair accessible' equivalent shall be:

- Level 08: Unit RK.121
- Level 09: Unit RK.121
- Level 10: Unit RK.121
- Level 11: Unit RK.121
- Level 12: Unit RK.121
- Level 13: Unit RK.121
- Level 14: Unit RK.121
- Level 15: Unit RK.121

The development shall be carried out in accordance with the details thereby approved by the appointed building control body.

REASON:

In order to ensure the development complies with: the National Planning Policy Framework; Policy D7 (Accessible Housing) of the London Plan 2021; and Policy P5 (Student Homes) of the Southwark Plan 2022.

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

**22. FINAL EXTERNAL LIGHTING AND SECURITY SURVEILLANCE EQUIPMENT STRATEGY**

Before the first occupation of any part of the development hereby consented, a Final External Lighting and Security Surveillance Equipment Strategy shall be submitted to and approved in writing by the Local Planning Authority. The Strategy shall provide details of:

- all external lighting (including design, power and position of luminaries, and any dim-down and turn-off times); and
- the security surveillance equipment to be installed on the building and within all external areas at all levels of the building.

All the external lighting proposed by the Final External Lighting and Security Surveillance Equipment Strategy shall demonstrate compliance with the Institute of Lighting Professionals Guidance Note 01/20 'Guidance notes for the reduction of obtrusive light'.

The development shall not be carried out other than in accordance with the approved Final External Lighting and Security Surveillance Equipment Strategy.

REASON:

In order that the Local Planning Authority may be satisfied as to the details of the development in the interest of the visual amenity of the area, the safety and security of persons using the area and the amenity and privacy of adjoining occupiers in accordance with: the National Planning Policy Framework 2021; Policies D3 (Optimising Site Capacity Through the Design-led Approach), D4 (Delivering Good Design), D8 (Public Realm), D9 (Tall Buildings), D14 (Designing Out Crime) and D11 (Safety, Security and Resilience to Emergency) of the London Plan 2021; and Policies P13 (Design of Places), P56 (Protection of Amenity) and P16 (Designing Out Crime) of the Southwark Plan 2022.

23. DRAINAGE VERIFICATION REPORT

Before the first occupation of any part of the development hereby consented, a Drainage Verification Report prepared by a suitably qualified engineer shall be submitted to and approved in writing by the Local Planning Authority.

The Drainage Verification Report shall provide evidence that:

- the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications (or detail any minor variations where relevant) as detailed in the application-stage strategy (ref: Flood Risk Assessment and Drainage Strategy V2 - 2021007-S-REP002 - Rev P6 - Dated 24.05.2022 - Produced by CRE8 Structures LLP);
- include plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls; and
- include details of maintenance tasks for each drainage/ Sustainable Drainage Systems feature and state the responsible management company.

REASON:

To minimise the potential for the site to contribute to surface water flooding, in accordance with: the National Planning Policy Framework 2021; Policy S113 (Sustainable Drainage) of the London Plan 2021; and Southwark's Strategic Flood Risk Assessment 2017.

24. FLOOD WARNING AND EVACUATION PLAN

Before the first occupation of any part of the development hereby consented, a Flood Warning and Evacuation Plan shall be submitted to and approved in writing by the Local Planning Authority.

The Flood Warning and Evacuation Plan shall:

- state how occupants will be made aware that they can sign up to the Environment Agency Flood Warning services;
- state how occupants will be made aware the plan itself;
- provide details of how occupants should respond in the event that they receive a flood warning, or become aware of a flood;
- state the measures that will be implemented to provide appropriate refuge, as well as safe and efficient evacuation for occupiers, in a flood event; and
- provide details of any flood mitigation and resilience measures designed into the scheme post-permission additional to those secured at planning application approval stage.

The approved Flood Warning and Evacuation Plan shall be implemented on first occupation of the premises hereby approved and carried out in accordance with the approved details for the lifetime of the development.

REASON:

To ensure that a strategy is in place that will reduce the risk to occupiers in the event of a flood, given that part of the site is at risk of surface water flooding, in accordance with: the National Planning Policy Framework 2021; Policy SI12 (Flood Risk Management) of the London Plan 2021; P68 (Reducing Flood Risk) of the Southwark Plan 2022; and Southwark's Strategic Flood Risk Assessment 2017.

## 25. ELECTRIC VEHICLE CHARGING POINT

Before the first occupation of any part of the development hereby consented, details of the installation (including location and type) of the one electric vehicle charger point to serve the on-street Blue Badge parking space shall be submitted to and approved in writing by the Local Planning Authority.

The approved electric vehicle charger point shall be installed prior to occupation of any part of the development, and shall not be carried out other than in accordance with the approval given.

REASON:

To encourage more sustainable travel, in accordance with: the National Planning Policy Framework 2021; Policy T6 (Car Parking) of the London Plan 2021; and Policy P54 (Car Parking) of the Southwark Plan 2022.

## 26. FINAL DELIVERY AND SERVICING MANAGEMENT PLAN

Before the first occupation of any part of the development hereby approved, a Final Delivery and Servicing Management Plan (DSP) detailing how all parts of the site are to be serviced shall be submitted to

and approved in writing by the Local Planning Authority. The Final DSP shall be based on the principles set out in the Draft Delivery and Servicing Management Plan (ref: Draft Delivery and Servicing Plan - Dated March 2022 - Produced by Caneparo Associates).

Consolidation of deliveries through this development's facilities management and/or off-site consolidation centres plus 'just in time' deliveries, in accordance with Transport for London's guidance, is encouraged.

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

REASON:

To ensure compliance with: the National Planning Policy Framework 2021; Policies T6 (Assessing and Mitigating Transport Impacts) and T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policies P50 (Servicing), P62 (Reducing Waste) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

## 27. TRAVEL PLAN AND TRANSPORT METHODS SURVEY

a) Before the first occupation of any part of the development hereby approved, a Final Travel Plan shall be submitted to and approved in writing 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 Draft Travel Plan (ref: Draft Student Travel Plan - Dated March 2022 - Produced by Caneparo Associates).

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;
- how those results compares with the methods envisaged in the Final Travel Plan; and
- any additional measures to be taken to encourage the use of public transport, walking and cycling to the site;

shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out other in accordance with any such approval given.

REASON:

In order that the use of non-car based travel is encouraged in accordance with: the National Planning Policy Framework 2021; Policies GG3 (Creating a Healthy City), T4 (Assessing and Mitigating Transport Impacts) of the London Plan 2021, and; Policies P45 (Healthy

Developments), P50 (Highways Impacts), P51 (Walking) and P53 (Cycling) of the Southwark Plan 2022.

## 28. BREEAM CERTIFICATION

a) Before the first occupation of any part of the development hereby consented, an interim report/letter (together with any supporting evidence) from the licensed BREEAM assessor shall be submitted to and approved in writing by the Local Planning Authority. 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 the agreed 'Excellent' BREEAM Standards.

b) Within 12 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 'Excellent' BREEAM standards have been met.

### REASON:

To ensure the proposal complies with: the National Planning Policy Framework 2021; Policy SI2 (Minimising Greenhouse Gas Emissions) of the London Plan 2021; and Policies SP6 (Climate Emergency) and P69 (Sustainability Standards) of the Southwark Plan 2022.

## 29. URBAN GREENING CERTIFICATION

a) Before the first occupation of any part of the development hereby consented, an interim report/letter (together with any supporting evidence) from a suitably qualified landscape specialist shall be submitted to and approved in writing by the Local Planning Authority. 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 the agreed UGF score of 0.18.

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 Local Planning Authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed UGF score of 0.18 has been met.

### REASON:

To ensure the proposal complies delivers the agreed UGF score, in accordance with: the National Planning Policy Framework 2021; Policy G5 (Urban Greening) of the London Plan 2021; and Polices SP6 (Climate

Emergency), P13 (Design of Places), P59 (Green Infrastructure), P60 (Biodiversity) and P65 (Improving Air Quality) of the Southwark Plan 2022.

30. THAMES WATER: ACCOMMODATION OF ADDITIONAL WATER FLOWS (COMBINED WASTE WATER INFRASTRUCTURE)

Before the first occupation of any part of the development hereby consented, the following shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Thames Water):

- evidence that combined waste water capacity exists off site to serve the development; or
- a 'Development and Infrastructure Phasing Plan'.

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.

REASON:

To ensure monitoring is in place to avoid sewage flooding and/or potential pollution incidents arising from any network reinforcement works necessary to accommodate the proposed development, in accordance with: the National Planning Policy Framework 2021; Policy SI5 (Water Infrastructure) of the London Plan 2021; and Policies SP6 (Climate Emergency), P64 (Contaminated Land and Hazardous Substances) and IP1 (infrastructure) of the Southwark Plan 2022.

31. THAMES WATER: ACCOMMODATION OF ADDITIONAL WATER FLOWS (POTABLE WATER INFRASTRUCTURE)

Before the first occupation of any part of the development hereby consented, the following shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Thames Water):

- evidence that all water network upgrades required to accommodate the additional demand to serve the development have been completed;
- a 'Development and Infrastructure Phasing Plan'.

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.

REASON:

To ensure that sufficient capacity is made available to accommodate the additional demand generated by the new development (network reinforcement works are anticipated to be necessary to avoid no / low water pressure), in accordance with: the National Planning Policy Framework 2021; Policy SI5 (Water Infrastructure) of the London Plan 2021; and Policies SP6 (Climate Emergency) and IP1 (infrastructure) of

the Southwark Plan 2022.

### 32. INTERNAL NOISE LEVELS FOR THE RESIDENTIAL UNITS

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

- Bedrooms: 35dB LAeq T#, 30 dB LAeq T\*, 45dB LAFmax T \*
- Living rooms: 35dB LAeq T #
- Dining room: 40 dB LAeq T #

[\* refers to night time - 8 hours between 23:00-07:00; # refers to day time - 16 hours between 07:00-23:00]

When assessing mitigation measures to ensure the above standards are met, the tenth highest individual LAMax event measured shall be used not a time-averaged LAMax.

Following completion of the development and before the first occupation of any part of the development, a Validation Test shall be carried out on a relevant sample of premises (10% of the dwellings, unless otherwise agreed with the Local Planning Authority), and the Validation Test shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be permanently maintained as such thereafter.

REASON:

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources, in accordance with: the National Planning Policy Framework 2021; Policy D14 (Noise) of the London Plan 2022; and Policies P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

### 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 plant Specific 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 in full accordance with the methodology of 'BS4142:2014 +A1:2019'.

Following the installation of the plant and its mitigating measures, a Validation Test shall be carried out to ensure that the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. The results shall be submitted to the Local Planning Authority for approval in writing. The plant and equipment shall be installed and constructed, 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, and that the local environment does not suffer from noise creep due to plant and machinery, in accordance with: the National Planning Policy Framework 2021; Policy D14 (Noise) of the London Plan 2022; and Policies P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

#### 34. EXTRACTION AND VENTILATION SCHEME FOR COMMERCIAL KITCHEN (CLASS E[c]) USES

Before commencement of any Class E[c] (restaurant or cafe) use, full particulars and details of a scheme for the extraction and ventilation of any commercial kitchen use shall be submitted to and approved by the Local Planning Authority, demonstrating that that fumes and odours from the kitchen would not affect public health or residential amenity. The scheme shall include:

- details of extraction rate and efflux velocity of extracted air;
- full details of grease, particle and odour abatement plant;
- the location and orientation of the extraction ductwork and discharge terminal; and
- a Management and Servicing Plan for maintenance of the extraction system.

Once approved, the scheme shall be implemented in full and permanently maintained thereafter.

#### REASON:

In order to ensure that that any installed ventilation, ducting and/or ancillary equipment is 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; Policies Policy D4 (Delivering Good Design) and SI 1 (Improving Air Quality) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality), P56 (Protection of Amenity) and P65 (Improving Air Quality) of the Southwark Plan 2022.

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

#### 35. HOURS OF OPERATION: FLEXIBLE COMMERCIAL UNIT

The flexible commercial unit hereby consented (and which is denoted as "Kiosk" on approved plan ROCK-MLA-XX-00-DR-A-ZZ\_310000 - Rev PL3), shall not be carried on outside of the following hours:

- 07:00hrs to 23:00hrs on Mondays to Saturdays (including Bank Holidays);
- 08:00hrs to 22:00hrs on Sundays.



## REASON:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, in accordance with: the National Planning Policy Framework 2021; Policy D14 (Noise) of the London Plan 2021; P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

36. RESTRICTION: SITING AND HOURS OF USE OF OUTDOOR FURNITURE ASSOCIATED WITH THE FLEXIBLE COMMERCIAL UNIT

Any tables, chairs and/or other outdoor furniture used in connection with the flexible commercial unit shall at all times be sited fully within the designated external dining area, as demarcated by the dashed green line on the following approved drawing:

- ROCK-MLA-XX-00-DR-A-312000 - Rev P009.07

The tables, chairs and/or other outdoor furniture used within the designated external dining area associated shall be vacated outside of the following hours:

- 08:00-22:00 on Mondays to Saturdays (including Bank Holidays); and
- 09:00-22:00 on Sundays.

## REASON:

In order to keep a reasonable width of the Low Line public realm clear of obstruction in the interests of facilitating comfortable and safe pedestrian movement, and to protect the amenity of nearby residential occupiers from noise or disturbance from any activities associated with the use or mis-use of this furniture during the late evening and night-time, in accordance with: the National Planning Policy Framework 2021; Policies D8 (Public Realm) and D14 (Noise) of the London Plan 2022; and Policies P13 (Design of Places), P14 (Design Quality), P52 (Low Line Routes) and P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

37. SERVICING HOURS

All deliveries or collections to the development hereby approved shall not be outside of the following hours:

- 09:00 to 20:00 on Monday to Fridays;
- 09:00 to 18:00 on Saturdays; and
- 10:00 to 16:00 on Sundays and Bank Holidays.

## REASON:

To safeguard the amenity of neighbouring residential properties in accordance with: the National Planning Policy Framework 2021; Policies D14 (Noise) of the London Plan 2021 and T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policy P56 (Protection of Amenity) of the Southwark Plan 2022.

38. PROVISION AND RETENTION OF THE DISPLAY ROOM ON TIVERTON STREET

Before the first occupation of any part of the development hereby approved, the ground floor display room (as depicted on approved plan ROCK-MLA-XX-00-DR-A-ZZ\_310000 - Rev PL3), the purpose of which is to display art or exhibits of cultural/public interest, shall be provided and made operational.

The display room shall thereafter be retained and the space used principally for the purposes of displaying works of art or exhibits of cultural/public interest. The display shall not be used for general storage purposes.

REASON:

To ensure the display room makes a positive contribution to the adjacent Tiverton Street public realm by providing a truly active and visually interesting frontage, in turn creating a positive pedestrian experience, and for these benefits to endure for the lifetime of the development, in accordance with: the National Planning Policy Framework 2021; Policies D3 (Optimising Site Capacity Through the Design-led Approach), D4 (Delivering Good Design), D8 (Public Realm) and D9 (Tall Buildings) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality), P17 (Tall Buildings) of the Southwark Plan 2022.

39. PROVISION AND RETENTION OF REFUSE STORAGE FACILITIES

Before the first occupation of any part of the development hereby approved, the refuse storage facilities (as denoted as "Bin Store and "Bulk Storage" on approved plan ROCK-MLA-XX-00-DR-A-ZZ\_310000 - Rev PL3) 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; Policies SI7 (Reducing Waste and Supporting the Circular Economy) and T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policies P45 (Healthy Developments), P50 (Highways Impacts), P56 (Protection of Amenity) and P62 (Reducing Waste) of the Southwark Plan 2022.

40. RESTRICTION: NO INSTATEMENT OF APPURTENANCES

No meter boxes, flues, vents or pipes (other than rainwater pipes) or other appurtenances not shown on the approved drawings shall be fixed or installed on the elevations of the buildings, unless otherwise approved by the Local Planning Authority.

**REASON:**

To ensure such works do not detract from the appearance of the buildings in accordance with: 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 P56 (Protection of Amenity) of the Southwark Plan 2022.

**41. RESTRICTION: NO INSTATEMENT OF 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', including any changes to the envelopes of the approved rooftop plant as long as such changes remain lower than the parapet line) application pursuant to this permission, 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 enclosure 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; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality) and P56 (Protection of Amenity) of the Southwark Plan 2022.

**42. RESTRICTION: NO INSTATEMENT OF TELECOMMUNICATIONS EQUIPMENT**

Notwithstanding the provisions of Schedule 2, Part 16 of the Town & Country Planning (General Permitted Development) (England) Order 2015 [as amended or re-enacted] no external telecommunications equipment or structures shall be placed on the roof or any other part of a building hereby permitted, unless otherwise approved by the Local Planning Authority.

**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; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality) and P56 (Protection of Amenity) of the Southwark Plan 2022.

43. RESTRICTION: USE OF THE FLEXIBLE RETAIL/SERVICE/DINING FLOORSPACE

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 or enactment of those Orders), and notwithstanding the other uses within Class E:

- the flexible retail/service/dining floorspace hereby approved shall be used for Use Class E[a], E[b] and/or E[c] (retail, professional services and/or

dining) purposes only;

- the ancillary floorspace hereby approved shall be used for ancillary purposes to the above uses only;

unless otherwise agreed by way of a formal application for planning permission.

REASON:

In order to ensure that retail uses are delivered on this site within the Central Activities Zone, Opportunity Area and town centre in line with its assessment, and because the other Class E uses may have different impacts than those assessed within the application, all in accordance with: the National Planning Policy Framework 2021; Policies SD1 (Opportunity Areas), SD4 (The Central Activities Zone), SD5 (Offices and Other Strategic Functions and Residential Development in the CAZ) and SD6 (Town Centres and High Streets), of the London Plan (2021); and AV.09 Area Vision and Policy P35 (Town and Local Centres) of the Southwark Plan 2022.

44. RESTRICTION: NO OBSCURING TREATMENT OF THE GLAZED FRONTAGE OF THE STAFF ROOM

No part of the glazed frontages of the ground floor staff room (as denoted on approved plan ROCK-MLA-XX-00-DR-A-ZZ\_310000 - Rev PL3) shall be painted, tinted, etched, have vinyl/film/translucent applied, or be in any other way obscured.

REASON:

To ensure that there is no obstruction which may restrict the visual transparency into and out of the glazing, in the interests of pedestrian security and to secure an appropriate street frontage and appearance, in accordance with: the National Planning Policy Framework

2021; Policies D3 (Optimising Site Capacity Through the Design-led Approach), D4 (Delivering Good Design), D8 (Public Realm) and D9 (Tall Buildings) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality), P17 (Tall Buildings) of the Southwark Plan 2022.

45. **RESTRICTION: NO UNAUTHORISED PENETRATIVE GROUNDWORKS (PILING OR OTHER FOUNDATION DESIGNS)**

Piling or any other foundation designs using penetrative methods other than those hereby approved shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

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

**REASON:**

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants, in accordance with: the National Planning Policy Framework 2021; and Policy P64 (Contaminated Land and Hazardous Substances) of the Southwark Plan 2022.

46. **RESTRICTION: NO INTO-GROUND SURFACE WATER INFILTRATION DRAINAGE SYSTEMS**

No drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters.

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

**REASON:**

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants, and because infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater, in accordance with the National Planning Policy Framework 2021; and Policy P64 (Contaminated Land and Hazardous Substances) of the Southwark Plan 2022.

## 47. FLOOD RISK ASSESSMENT COMPLIANCE

The development hereby approved shall be carried out in accordance with the conclusions and recommendations set out at Parts 7.1.1 to 7.1.11 of the approved Flood Management Plan, which comprises the following document(s):

- Flood Risk Assessment and Drainage Strategy - Ref 2021007-S-REP002 - Rev P6 - Dated 24.05 2022 - Produced by CRE8 Structures LLP

## REASON:

To minimise the risk to life and minimise building damage in a flood event, in accordance with: the National Planning Policy Framework 2021; Policy SI12 (Flood Risk Management) of the London Plan 2021; Policies SP6 (Climate Emergency) and P68 (Reducing Flood Risk) of the Southwark Plan 2022; and the Southwark Strategic Flood Risk Assessment 2017.

## 48. BASEMENT IMPACT ASSESSMENT COMPLIANCE

The development hereby approved shall be carried out in accordance with the recommendations and conclusions contained at Parts 9.1 to 9.3 of approved document Basement Impact Assessment, which comprises the following document(s):

- Basement Impact Assessment - Ref 2021007-S-REP003 - Rev P3
- Dated 02.03.2022 - Produced by CRE8 Structures LLP

## REASON:

To ensure the basement is designed safely in reference to ground movement, flood risk, sustainable urban drainage and archaeology, in accordance with: the National Planning Policy Framework 2021; Policy D10 (Basement Development) of the London Plan 2021; Policies P14 (Design Quality), P23 (Archaeology) and P68 (Reducing Flood Risk).

## 49. FIRE SAFETY STRATEGY COMPLIANCE

The development hereby approved shall not be carried out other than in accordance with the approved Fire Safety Strategy, which comprises the following documents:

- 'PRE-PLANNING FIRE STRATEGY – RIBA Stage 2' - Ref OF-000292-OFS-01-E - Dated 14.10.2022 - Produced by Orion Fire Engineering;
- 'Fire statement form' [Gateway One form] - Dated 14.10.2022 - Produced by Orion Fire Engineering.

## 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 Policies D11 (Safety, Security and Resilience to Emergency) and D12 (Fire Safety) of the London Plan 2021.

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

**50. 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: the National Planning Policy Framework 2021; and Policy P23 (Archaeology) of the Southwark Plan 2022.

**51. POST-CONSTRUCTION WHOLE LIFE-CYCLE CARBON REPORTING**

Upon the completion of the as-built design and upon commencement of RIBA Stage 6, but prior to the building being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development shall submit the Post-Construction Whole Life-Cycle Carbon Assessment (Post-Construction WLCA) to the GLA.

The Post-Construction WLCA shall be submitted to [ZeroCarbonPlanning@london.gov.uk](mailto:ZeroCarbonPlanning@london.gov.uk). The owner should use the post construction tab of the GLA's WLC assessment template and this should be completed accurately and in its entirety, in line with the criteria set out in the GLA's Whole Life-Cycle Carbon Assessments LPG.

The Post-Construction WLCA should provide an update of the information submitted at planning 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 GLA's Whole Life-Cycle Carbon Assessments LPG and should be received no later than three months post as-built design completion, unless otherwise agreed.

## REASON:

To ensure whole life-cycle carbon is calculated and reduced, and to demonstrate compliance with: the National Planning Policy Framework 2021; and Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan 2021; and Policy P70 (Energy) of the Southwark Plan 2022.

## 52. POST-COMPLETION CIRCULAR ECONOMY REPORTING

No later than three months following substantial completion of the development hereby consented:

a) a Post-Completion Circular Economy Report setting out the predicted and actual performance against all numerical targets in the Planning Stage Circular Economy Statement shall be submitted to the GLA at CircularEconomyLPG@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statements LPG; and

b) confirmation of submission of the Post-Completion Circular Economy Report shall be submitted to the Local Planning Authority for approval in writing.

## REASON:

To ensure that Planning Stage Circular Economy Statement has been implemented in the construction and delivery of the development, and that all on-going operational measures and mechanisms have been satisfactorily implemented, in order to achieve Circular Economy goals and in accordance with: the National Planning Policy Framework 2021; and Policies GG6 (Increasing Efficiency and Resilience) and SI7 (Reducing Waste and Supporting the Circular Economy) of the London Plan 2021; and Policy P62 (Reducing Waste) of the Southwark Plan 2022.

Signed:

*Stephen Platts*

Director of Planning and Growth



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## Important Notes Relating to the Council's Decision

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### 1. Conditions

- If permission has been granted you will see that it may be subject to a number of planning conditions. They are an integral part of our decision on your application and are important because they describe how we require you to carry out the approved work or operate the premises. It is YOUR responsibility to comply fully with them. Please pay particular attention to those conditions which have to be met before work commences, such as obtaining approval for the siting and levels of buildings and the protection of trees on the site. If you do not comply with all the conditions in full this may invalidate the permission.
- Further information about how to comply with planning conditions can be found at:

[https://www.planningportal.co.uk/info/200126/applications/60/consent\\_types/12](https://www.planningportal.co.uk/info/200126/applications/60/consent_types/12)

- Please note that there is a right of appeal against a planning condition. Further information can be found at:

[https://www.planningportal.co.uk/info/200207/appeals/108/types\\_of\\_appeal](https://www.planningportal.co.uk/info/200207/appeals/108/types_of_appeal)

### 2. Community Infrastructure Levy (CIL) Information

- If your development has been identified as being liable for CIL you need to email [Form 1: CIL Additional Information](#), [Form 2: Assumption of Liability](#) and [Form 6: Commencement Notice](#) to [cil.s106@southwark.gov.uk](mailto:cil.s106@southwark.gov.uk) as soon as possible, so that you can be issued with a Liability Notice. This should be done at least a day before commencement of the approved development.
- **Payment of the CIL charge is mandatory and the CIL Regulations comprises a range of enforcement powers and penalties for failure to following correct procedures to pay, including stop notices, surcharges, late payment interests and prison terms.**
- To identify whether your development is CIL liable, and further details about CIL including eligibility and procedures for any CIL relief claims, please see the Government's CIL guidance:

<https://www.gov.uk/guidance/community-infrastructure-levy>

- All CIL Forms are available to download from Planning Portal:

[https://www.planningportal.co.uk/info/200136/policy\\_and\\_legislation/70/community\\_infrastructure\\_levy/5](https://www.planningportal.co.uk/info/200136/policy_and_legislation/70/community_infrastructure_levy/5)

- Completed forms and any CIL enquiries should be submitted to [cil.s106@southwark.gov.uk](mailto:cil.s106@southwark.gov.uk)

### 3. National Planning Policy Framework

- In dealing with this application we have implemented the requirements in the National Planning Policy Framework to work with the applicant/agent in a positive, proactive and creative way by offering a pre-application advice service; as appropriate updating applicants/agents of any issues that may arise in the processing of their application and where possible and if applicable suggesting solutions to secure a successful outcome. We have considered the application in light of our statutory policies in our development plan as set out in the officer's report.

### 4. Appeals to the Secretary of State

- If you are aggrieved by the decision of your local planning authority to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.

Appeals can be made online at: <https://www.gov.uk/planning-inspectorate>.

If an enforcement notice is or has been served relating to the same or substantially the same land and development as in your application and if you want to appeal against your local planning authority's decision on your application, then you must do so within: **28 days** of the date of service of the enforcement notice, OR within **6 months** (12 weeks in the case of a householder or minor commercial appeal) of the date of this notice, whichever period expires earlier.

- The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to the Secretary of State that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.
- If you intend to submit an appeal that you would like examined by inquiry then you must notify the Local Planning Authority and Planning Inspectorate ([inquiryappeals@planninginspectorate.gov.uk](mailto:inquiryappeals@planninginspectorate.gov.uk)) at least 10 days before submitting the appeal.
- Further details are on GOV.UK (<https://www.gov.uk/government/collections/casework-dealt-with-by-inquiries>).

### 5. Purchase Notice

- If either the local planning authority or the Secretary of State grants permission subject to conditions, the owner may claim that the land can neither be put to a reasonably beneficial use in its existing state nor made capable of reasonably beneficial use by the carrying out of any development which has been or would be permitted. In these circumstances the owner

may serve a purchase notice on the Council requiring the Council to purchase the owner's interest in the land in accordance with Part VI of the Town and Country Planning Act 1990

## **6. Provisions for the Benefit of the Disabled**

- Applicants are reminded that account needs to be taken of the statutory requirements of the Disability Discrimination Act 1995 to provide access and facilities for disabled people where planning permission is granted for any development which provides:
  - i. Buildings or premises to which the public are to be admitted whether on payment or otherwise. [Part III of the Act].
  - ii. Premises in which people are employed to work as covered by the Health and Safety etc At Work Act 1974 and the Management of Health and Safety at Work Regulations as amended 1999. [Part II of the Act].
  - iii. Premises to be used as a university, university college or college, school or hall of a university, or intended as an institution under the terms of the Further and Higher Education Act 1992. [Part IV of the Act].
- Attention is also drawn to British Standard 8300:2001 Disability Access, Access for disabled people to schools buildings – a management and design guide. Building Bulletin 91 (DfEE 99) and Approved Document M (Access to and use of buildings) of the Building Regulations 2000 or any such prescribed replacement.

## **7. Other Approvals Required Prior to the Implementation of this Permission.**

- The granting of approval of a reserved matter or outstanding matter does not relieve developers of the necessity for complying with any Local Acts, regulations, building by-laws and general statutory provisions in force in the area, or allow them to modify or affect any personal or restrictive covenants, easements, etc., applying to or affecting either the land to which the permission relates or any other land or the rights of any persons or authorities (including the London Borough of Southwark) entitled to the benefits thereof or holding an interest in the property concerned in the development permitted or in any adjoining property. In this connection applicants are advised to consult the council's Highway Maintenance section [tel. 020-7525-2000] about any proposed works to, above or under any road, footway or forecourt.

## **8. Works Affecting the Public Highway**

- You are advised to consult the council's Highway Maintenance section [tel. 020-7525-2000] about any proposed works to, above or under any road, footway or forecourt.

## **9. The Dulwich Estate Scheme of Management**

- Development of sites within the area covered by the Scheme of Management may also require the permission of the Dulwich Estate. If your property is in

the Dulwich area with a post code of SE19, 21, 22, 24 or 26 you are advised to consult the Estates Governors', The Old College, Gallery Road SE21 7AE [tel: 020-8299-1000].

#### **10. Building Regulations.**

- You are advised to consult Southwark Building Control at the earliest possible moment to ascertain whether your proposal will require consent under the Building Act 1984 [as amended], Building Regulations 2000 [as amended], the London Building Acts or other statutes. A Building Control officer will advise as to the submission of any necessary applications, [tel. call centre number 0845 600 1285].

#### **11. The Party Wall Etc. Act 1996.**

- You are advised that you must notify all affected neighbours of work to an existing wall or floor/ceiling shared with another property, a new building on a boundary with neighbouring property or excavation near a neighbouring building. An explanatory booklet aimed mainly at householders and small businesses can be obtained from the Department for Communities and Local Government [DCLG] Free Literature tel: 0870 1226 236 [quoting product code 02BR00862].

#### **12. Important**

- This is a PLANNING PERMISSION only and does not operate so as to grant any lease, tenancy or right of occupation of or entry to the land to which it refers.

## Appendix 2: Planning Policies

### Adopted planning policy

#### National Planning Policy Framework (NPPF)

1. The revised National Planning Policy Framework ('NPPF'), updated in 2021, sets out the national planning policy and how this should be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. At its heart is a presumption in favour of sustainable development.
2. Paragraph 215 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.
3. The relevant chapters of the NPPF are:
  - Chapter 2 - Achieving sustainable development
  - Chapter 5 - Delivering a sufficient supply of homes
  - Chapter 6 - Building a strong, competitive economy
  - Chapter 7 - Ensuring the vitality of town centres
  - Chapter 8 - Promoting healthy and safe communities
  - Chapter 9 - Promoting sustainable transport
  - Chapter 11 - Making effective use of land
  - Chapter 12 - Achieving well-designed places
  - Chapter 14 - Meeting the challenge of climate change, flooding and coastal change
  - Chapter 15 - Conserving and enhancing the natural environment
  - Chapter 16 - Conserving and enhancing the historic environment

#### London Plan

4. In March 2021, the Mayor of London published the London Plan. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London.
5. The strategic objectives of the London Plan are to build strong and inclusive communities, make the best use of land, promote a healthy city, optimise housing delivery including affordable housing, conserve and enhance London's global competitiveness, and move towards a more resilient and sustainable city. Development proposals must comply with the various policies within the Plan and should follow the guidance set out within Supplementary Planning Documents, Guidance and Strategies.
6. The relevant policies of the London Plan are:
  - GG1 - Building strong and inclusive communities
  - GG2 - Making the best use of land
  - GG3 - Creating a healthy city

- GG4 - Delivering the homes Londoners need
- GG5 - Growing a good economy
- GG6 - Increasing efficiency and resilience
- Policy SD1 - Opportunity Areas
- Policy SD4 - The Central Activities Zone
- Policy SD5 - Offices, other strategic functions and residential development in the CAZ
- Policy SD6 - Town centres and high streets
- Policy SD7 - Town centres: development principles and development plan documents
- Policy SD10 - Strategic and local regeneration
- Policy D1 - London's form, character and capacity for growth
- Policy D2 - Infrastructure requirements for sustainable densities
- Policy D3 - Optimising site capacity through design-led approach
- Policy D4 - Delivering good design
- Policy D5 - Inclusive design
- Policy D8 - Public realm
- Policy D9 - Tall buildings
- Policy D10 - Basement development
- Policy D11 - Safety, security and resilience to emergency
- Policy D12 - Fire safety
- Policy D13 - Agent of change
- Policy D14 - Noise
- Policy H1 - Increasing housing supply
- Policy H4 - Delivering affordable housing
- Policy H5 - Threshold approach to applications
- Policy H6 - Affordable housing tenure
- Policy H7 - Monitoring of affordable housing
- Policy H15 - Purpose-built student accommodation
- Policy S3 - Education and childcare facilities
- Policy E8 - Sector growth opportunities and clusters
- Policy E9 - Retail, markets and hot food takeaways
- Policy E11 - Skills and opportunities for all
- Policy HC1 - Heritage conservation and growth
- Policy HC3 - Strategic and local views
- Policy G1 - Green infrastructure
- Policy G4 - Open space
- Policy G5 - Urban greening
- Policy G6 - Biodiversity and access to nature
- 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 T1 - Strategic approach to transport
- Policy T2 - Healthy Streets
- Policy T3 - Transport capacity, connectivity and safeguarding
- Policy T4 - Assessing and mitigating transport impacts
- Policy T5 - Cycling
- Policy T6 - Car parking
- Policy T6.1 - Residential parking
- Policy T6.3 - Retail parking
- Policy T6.5 - Non-residential disabled persons parking
- Policy T7 - Deliveries, servicing and construction
- Policy T9 - Funding transport infrastructure through planning
- Policy DF1 - Delivery of the Plan and Planning Obligations

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

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

- Mayor of London: Accessible London - Achieving an Inclusive Environment (SPG, 2004)
- Mayor of London: Affordable Housing and Viability (SPG, 2017)
- Mayor of London: 'Be Seen' Energy Monitoring Guidance LPG (2022)
- Mayor of London: Circular Economy Statements (LPG, 2022)
- Mayor of London: Climate Change Mitigation and Energy Strategy (2010)
- Mayor of London: Climate Change Adaptation Strategy (2011)
- Mayor of London: Crossrail Funding (SPG, 2016)
- Mayor of London: Environment Strategy (2018)
- Mayor of London: Housing (SPG, 2016)
- Mayor of London: Housing Strategy (2018)
- Mayor of London: London View Management Framework (SPG, 2012)
- Mayor of London: Planning for Equality and Diversity in London (SPG, 2007)
- Mayor of London: Public London Charter (2012)
- 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: Whole Life Carbon Assessments (LPG, 2022)

### Draft GLA guidance (emerging material considerations)

8. To support the London Plan 2021, the GLA has drafted further London Planning Guidance (LPG) on topic areas including:

- Mayor of London: Air Quality Neutral (draft)
- Mayor of London: Fire Safety (draft)
- Mayor of London: Optimising site capacity: a design-led approach (draft)
- Mayor of London: Sustainable transport, walking and cycling (draft)
- Mayor of London: Urban Greening Factor (draft)

## Southwark Plan

9. The Southwark Plan, published in February 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
- AV.09 - Elephant and Castle Area Vision
- Policy P5 - Student homes
- Policy P8 - Wheelchair accessible and adaptable housing
- Policy P13 - Design of places
- Policy P14 - Design quality
- Policy P15 - Residential design
- Policy P16 - Designing out crime
- Policy P17 - Tall Buildings
- Policy P18 - Efficient use of land
- Policy P19 - Listed buildings and structures
- Policy P21 - Conservation of the historic environment and natural heritage
- Policy P23 - Archaeology
- Policy P27 - Education places
- Policy P28 - Access to employment and training
- Policy P34 - Railway arches
- Policy P35 - Town and local centres
- Policy P39 - Shop fronts
- Policy P41 - Hotels and other visitor accommodation
- Policy P44 - Broadband and digital infrastructure
- Policy P49 - Public transport
- Policy P50 - Highway impacts
- Policy P51 - Walking
- Policy P52 - Low Line routes
- Policy P53 - Cycling
- Policy P54 - Car parking



- Policy P55 - Parking standards for disabled people and the physically impaired
- Policy P56 - Protection of amenity
- Policy P59 - Green infrastructure
- Policy P60 - Biodiversity
- Policy P62 - Reducing waste
- Policy P64 - Contaminated land and hazardous substances
- Policy P65 - Improving air quality
- Policy P66 - Reducing noise pollution and enhancing soundscapes
- Policy P67 - Reducing water use
- Policy P68 - Reducing flood risk
- Policy P69 - Sustainability standards
- Policy P70 - Energy
- Policy IP1 - Infrastructure
- Policy IP2 - Transport infrastructure
- Policy IP3 - Community infrastructure levy (CIL) and Section 106 planning obligations
- Policy IP6 - Monitoring development
- Policy IP7 - Statement of Community Involvement

### Relevant Local-level Supplementary Planning Documents

10. The relevant supplementary planning documents and guidance documents from the local development plan are as follows:

- 2015 Technical Update to the Residential Design Standards 2011 (SPD, 2015)
- Affordable Housing (Draft SPD, 2011)
- Design and Access Statements (SPD, 2007)
- Development Viability (SPD, 2016)
- Section 106 Planning Obligations and Community Infrastructure Levy (SPD, 2015 with 2020 Update)
- Sustainability Assessment (SPD, 2009)
- Sustainable Design and Construction (SPD, 2009)
- Sustainable Transport (SPD, 2010)

### Appendix 3: Relevant planning history

1.	<p>Reference Number: 13/AP/3450 Application Type: Full Planning Permission</p> <p><i>Demolition of existing buildings and redevelopment of site to provide a 13 storey building with 30 residential units (comprising 9 x 1 bed, 17 x 2 bed and 4 x 3 bed units) and 373m<sup>2</sup> restaurant (A3 use) at part basement/part ground floor level and mezzanine storage with the provision of 2 disabled car parking spaces and associated refuse and cycle storage.</i></p> <p>Decision: Granted with legal agreement Decision date: 14.10.2014</p>
2.	<p>Reference Number: 19/AP/0750 Application Type: Full Planning Permission</p> <p>Demolition of existing buildings and erection of a 21-storey building (max height 70.665m) with basement and associated roof plant to provide 6,042.3sqm (GIA) of new commercial floor space and redevelopment of 3 railway arches to provide 340.1sqm of flexible commercial space (A1,B1,D1,D2) with associated cycle parking storage, waste/recycling stores and new public realm.</p> <p>Decision: Granted with legal agreement Decision date: 31.01.2020</p>
3.	<p>Reference Number: 23/AP/0310 Application Type: Certificate of Lawfulness</p> <p><i>Certificate of Lawfulness (Existing) to confirm that planning permission 19/AP/0750 (approval date: 31.01.2020) has been implemented</i></p> <p>Decision: Granted Decision date: April 2023</p>

## Appendix 4: Consultation undertaken

**Site notice date:** 07/04/2022

**Press notice date:** 21/07/2022

**Case officer site visit date:** 07.04.2022

**Neighbour consultation letters sent:** 19/07/2022

### Internal services consulted

Flood Risk Management & Urban Drainage

Archaeology

Community Infrastructure Levy Team

Design and Conservation Team [Formal]

Local Economy

Ecology

Environmental Protection

Highways Development and Management

Highways Licensing

Transport Policy

Urban Forester

Waste Management

Community Infrastructure Levy Team

Design and Conservation Team [Formal]

Local Economy

Ecology

Environmental Protection

Highways Development and Management

Flood Risk Management & Urban Drainage

Transport Policy

Urban Forester

Waste Management

Design and Conservation Team [Formal]

Transport Policy

### **Statutory and non-statutory organisations**

Environment Agency

Great London Authority

Historic England

London Fire & Emergency Planning Authori

London Underground

Natural England - London & South East Re

Network Rail

Metropolitan Police Service (Designing O

Thames Water

Environment Agency

London Fire & Emergency Planning Authori

Metropolitan Police Service (Designing O

Thames Water

Metropolitan Police Service (Designing O

Transport for London

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

361 Metro Central Heights 119  
Newington Causeway London

347 Metro Central Heights 119  
Newington Causeway London

334 Metro Central Heights 119  
Newington Causeway London

325 Metro Central Heights 119  
Newington Causeway London

320 Metro Central Heights 119  
Newington Causeway London

313 Metro Central Heights 119  
Newington Causeway London

49-51 Tiverton Street London Southwark

248 Metro Central Heights 119  
Newington Causeway London

219 Metro Central Heights 119  
Newington Causeway London

189 Metro Central Heights 119 Newington Causeway London	Flat 17 Stephenson House Rockingham Estate Bath Terrace
Flat 8 Rumford House Rockingham Estate Bath Terrace	Flat 10 Stephenson House Rockingham Estate Bath Terrace
Flat 4 Rumford House Rockingham Estate Bath Terrace	Apartment 804 251 Southwark Bridge Road London
Flat 63 Stephenson House Rockingham Estate Bath Terrace	Apartment 602 251 Southwark Bridge Road London
Flat 7 Banks House Rockingham Estate Rockingham Street	Apartment 405 251 Southwark Bridge Road London
Flat 11 Banks House Rockingham Estate Rockingham Street	Apartment 302 251 Southwark Bridge Road London
Flat 58 Stephenson House Rockingham Estate Bath Terrace	Apartment 3010 251 Southwark Bridge Road London
Flat 8 Stephenson House Rockingham Estate Bath Terrace	Apartment 3002 251 Southwark Bridge Road London
Flat 10 Rennie House Rockingham Estate Bath Terrace	Apartment 2704 251 Southwark Bridge Road London
Flat 1 Rennie House Rockingham Estate Bath Terrace	Apartment 2701 251 Southwark Bridge Road London
Flat 4 Rankine House Rockingham Estate Bath Terrace	Apartment 2501 251 Southwark Bridge Road London
Flat 22 Rankine House Rockingham Estate Bath Terrace	Apartment 2205 251 Southwark Bridge Road London
Flat 20 Rankine House Rockingham Estate Bath Terrace	Apartment 2202 251 Southwark Bridge Road London
Flat 11 Rankine House Rockingham Estate Bath Terrace	Apartment 2108 251 Southwark Bridge Road London
Flat 40 Telford House Rockingham Estate Tiverton Street	Apartment 2007 251 Southwark Bridge Road London
Flat 22 Telford House Rockingham Estate Tiverton Street	Apartment 1903 251 Southwark Bridge Road London
Flat 13 Telford House Rockingham Estate Tiverton Street	Apartment 1404 251 Southwark Bridge Road London
Flat 1 Telford House Rockingham Estate Tiverton Street	Apartment 1310 251 Southwark Bridge Road London
Flat 2 Stephenson House Rockingham Estate Bath Terrace	131 Metro Central Heights 119 Newington Causeway London

Flat 13 Rennie House Rockingham Estate Bath Terrace	123 Metro Central Heights 119 Newington Causeway London
Apartment 1302 251 Southwark Bridge Road London	253 Metro Central Heights 119 Newington Causeway London
Flat 21 Banks House Rockingham Estate Rockingham Street	147 Metro Central Heights 119 Newington Causeway London
Apartment 2805 251 Southwark Bridge Road London	382 Metro Central Heights 119 Newington Causeway London
Flat 19 Telford House Rockingham Estate Tiverton Street	95 Metro Central Heights 119 Newington Causeway London
Flat 15 Telford House Rockingham Estate Tiverton Street	81 Metro Central Heights 119 Newington Causeway London
Flat 20 Pioneer Building 91 Newington Causeway	80 Metro Central Heights 119 Newington Causeway London
Store Lower Ground Floor Smeaton Court 50 Rockingham Street	72 Metro Central Heights 119 Newington Causeway London
Flat 49 Smeaton Court Arch Street	66 Metro Central Heights 119 Newington Causeway London
Flat 38 Smeaton Court Arch Street	
Flat 9 Smeaton Court Arch Street	61 Metro Central Heights 119 Newington Causeway London
Flat 31 Smeaton Court Arch Street	
Flat 22 Smeaton Court Arch Street	39 Metro Central Heights 119 Newington Causeway London
64-66 Newington Causeway London Southwark	36 Metro Central Heights 119 Newington Causeway London
Flat 35A Stephenson House Rockingham Estate Bath Terrace	15 Metro Central Heights 119 Newington Causeway London
73-75 Newington Causeway London Southwark	2 Metro Central Heights 119 Newington Causeway London
359 Metro Central Heights 119 Newington Causeway London	273 Metro Central Heights 119 Newington Causeway London
170 Metro Central Heights 119 Newington Causeway London	267 Metro Central Heights 119 Newington Causeway London
165 Metro Central Heights 119 Newington Causeway London	259 Metro Central Heights 119 Newington Causeway London
149 Metro Central Heights 119 Newington Causeway London	252 Metro Central Heights 119 Newington Causeway London
134 Metro Central Heights 119 Newington Causeway London	234 Metro Central Heights 119 Newington Causeway London

214 Metro Central Heights 119  
Newington Causeway London

202 Metro Central Heights 119  
Newington Causeway London

197 Metro Central Heights 119  
Newington Causeway London

195 Metro Central Heights 119  
Newington Causeway London

Flat 60 Stephenson House Rockingham  
Estate Bath Terrace

Flat 9 Banks House Rockingham Estate  
Rockingham Street

Flat 25 Banks House Rockingham Estate  
Rockingham Street

341 Metro Central Heights 119  
Newington Causeway London

328 Metro Central Heights 119  
Newington Causeway London

319 Metro Central Heights 119  
Newington Causeway London

315 Metro Central Heights 119  
Newington Causeway London

310 Metro Central Heights 119  
Newington Causeway London

17 Metro Central Heights 119 Newington  
Causeway London

14 Metro Central Heights 119 Newington  
Causeway London

288 Metro Central Heights 119  
Newington Causeway London

227 Metro Central Heights 119  
Newington Causeway London

225 Metro Central Heights 119  
Newington Causeway London

212 Metro Central Heights 119  
Newington Causeway London

208 Metro Central Heights 119  
Newington Causeway London

399A Metro Central Heights 119  
Newington Causeway London

199 Metro Central Heights 119  
Newington Causeway London

Flat 11 Rumford House Rockingham  
Estate Bath Terrace

82 Newington Causeway London  
Southwark

Flat 77 Stephenson House Rockingham  
Estate Bath Terrace

Flat 76 Stephenson House Rockingham  
Estate Bath Terrace

Flat 4 Banks House Rockingham Estate  
Rockingham Street

Flat 51 Stephenson House Rockingham  
Estate Bath Terrace

Apartment 2909 251 Southwark Bridge  
Road London

Apartment 1412 251 Southwark Bridge  
Road London

Apartment 3603 251 Southwark Bridge  
Road London

358A Metro Central Heights 119  
Newington Causeway London

169 Metro Central Heights 119  
Newington Causeway London

98 Metro Central Heights 119 Newington  
Causeway London

Flat 27 Telford House Rockingham  
Estate Tiverton Street

Flat 30 Smeaton Court Arch Street

Flat 3 Telford House Rockingham Estate  
Tiverton Street

Flat 8 Banks House Rockingham Estate  
Rockingham Street

Flat 30 Banks House Rockingham Estate  
Rockingham Street

Flat 18 Banks House Rockingham Estate  
Rockingham Street

Apartment 2302 251 Southwark Bridge  
Road London

Apartment 1904 251 Southwark Bridge  
Road London

Flat 21 Rankine House Rockingham  
Estate Bath Terrace

Flat 38 Stephenson House Rockingham  
Estate Bath Terrace

Apartment 1705 251 Southwark Bridge  
Road London

Apartment 1609 251 Southwark Bridge  
Road London

Apartment 1301 251 Southwark Bridge  
Road London

Apartment 601 251 Southwark Bridge  
Road London

Apartment 3305 251 Southwark Bridge  
Road London

Apartment 3303 251 Southwark Bridge  
Road London

Apartment 1107 251 Southwark Bridge  
Road London

Apartment 1102 251 Southwark Bridge  
Road London

Apartment 408 251 Southwark Bridge  
Road London

Apartment 406 251 Southwark Bridge  
Road London

Flat 16 Rumford House Rockingham  
Estate Bath Terrace

Flat 14 Rumford House Rockingham  
Estate Bath Terrace

Apartment 2510 251 Southwark Bridge  
Road London

Flat 25 Stephenson House Rockingham  
Estate Bath Terrace

Flat 19 Stephenson House Rockingham  
Estate Bath Terrace

Flat 16 Stephenson House Rockingham  
Estate Bath Terrace

Flat 7 Smeaton Court Arch Street

79 Metro Central Heights 119 Newington  
Causeway London

71 Metro Central Heights 119 Newington  
Causeway London

291 Metro Central Heights 119  
Newington Causeway London

13 Metro Central Heights 119 Newington  
Causeway London

51 Metro Central Heights 119 Newington  
Causeway London

32 Metro Central Heights 119 Newington  
Causeway London

265 Metro Central Heights 119  
Newington Causeway London

379A Metro Central Heights 119  
Newington Causeway London

103 Gaunt Street London Southwark

216 Metro Central Heights 119  
Newington Causeway London

213 Metro Central Heights 119  
Newington Causeway London

209 Metro Central Heights 119  
Newington Causeway London

206 Metro Central Heights 119  
Newington Causeway London

Flat 18 Pioneer Building 91 Newington  
Causeway

Railway Arch E Newington Causeway  
London

475 Metro Central Heights 119  
Newington Causeway London

468 Metro Central Heights 119  
Newington Causeway London



466 Metro Central Heights 119  
Newington Causeway London

462 Metro Central Heights 119  
Newington Causeway London

454 Metro Central Heights 119  
Newington Causeway London

452 Metro Central Heights 119  
Newington Causeway London

451 Metro Central Heights 119  
Newington Causeway London

450 Metro Central Heights 119  
Newington Causeway London

446 Metro Central Heights 119  
Newington Causeway London

442 Metro Central Heights 119  
Newington Causeway London

432 Metro Central Heights 119  
Newington Causeway London

422 Metro Central Heights 119  
Newington Causeway London

417 Metro Central Heights 119  
Newington Causeway London

Flat 22 Rennie House Rockingham  
Estate Bath Terrace

Flat 18 Rennie House Rockingham  
Estate Bath Terrace

Flat 27 Pioneer Building 91 Newington  
Causeway

2-4 Tiverton Street London Southwark

Flat 53 Smeaton Court Arch Street

Flat 35 Smeaton Court Arch Street

101 Metro Central Heights 119  
Newington Causeway London

88 Metro Central Heights 119 Newington  
Causeway London

283 Metro Central Heights 119  
Newington Causeway London

6 Metro Central Heights 119 Newington  
Causeway London

476 Metro Central Heights 119  
Newington Causeway London

473 Metro Central Heights 119  
Newington Causeway London

472 Metro Central Heights 119  
Newington Causeway London

456 Metro Central Heights 119  
Newington Causeway London

453 Metro Central Heights 119  
Newington Causeway London

448 Metro Central Heights 119  
Newington Causeway London

444 Metro Central Heights 119  
Newington Causeway London

430 Metro Central Heights 119  
Newington Causeway London

421 Metro Central Heights 119  
Newington Causeway London

Flat 34 26 Arch Street London

Flat 30 26 Arch Street London

Flat 22 26 Arch Street London

Flat 19 26 Arch Street London

132 Metro Central Heights 119  
Newington Causeway London

124 Metro Central Heights 119  
Newington Causeway London

196 Metro Central Heights 119  
Newington Causeway London

177 Metro Central Heights 119  
Newington Causeway London

175 Metro Central Heights 119  
Newington Causeway London

331 Metro Central Heights 119  
Newington Causeway London

292 Metro Central Heights 119  
Newington Causeway London

350 Metro Central Heights 119  
Newington Causeway London

140 Metro Central Heights 119  
Newington Causeway London

Flat 7 Wellesley Court 15 Rockingham  
Street

Flat 2 Smeaton Court Arch Street

Flat 23 Smeaton Court Arch Street

Flat 46A Stephenson House  
Rockingham Estate Bath Terrace

Elephant And Castle Public House 121  
Newington Causeway London

158 Metro Central Heights 119  
Newington Causeway London

148 Metro Central Heights 119  
Newington Causeway London

135 Metro Central Heights 119  
Newington Causeway London

306 Metro Central Heights 119  
Newington Causeway London

125 Metro Central Heights 119  
Newington Causeway London

37 Metro Central Heights 119 Newington  
Causeway London

408 Metro Central Heights 119  
Newington Causeway London

407 Metro Central Heights 119  
Newington Causeway London

404 Metro Central Heights 119  
Newington Causeway London

402 Metro Central Heights 119  
Newington Causeway London

84 Metro Central Heights 119 Newington  
Causeway London

70 Metro Central Heights 119 Newington  
Causeway London

57 Metro Central Heights 119 Newington  
Causeway London

387 Metro Central Heights 119  
Newington Causeway London

385 Metro Central Heights 119  
Newington Causeway London

369 Metro Central Heights 119  
Newington Causeway London

356 Metro Central Heights 119  
Newington Causeway London

Flat 6 West Combe Apartments 123  
Newington Causeway

9 Rockingham Street London Southwark

Flat 54 Smeaton Court Arch Street

Flat 20 Smeaton Court Arch Street

180 Metro Central Heights 119  
Newington Causeway London

163 Metro Central Heights 119  
Newington Causeway London

161 Metro Central Heights 119  
Newington Causeway London

143 Metro Central Heights 119  
Newington Causeway London

299 Metro Central Heights 119  
Newington Causeway London

178 Metro Central Heights 119  
Newington Causeway London

133 Metro Central Heights 119  
Newington Causeway London

30 Metro Central Heights 119 Newington  
Causeway London

112 Metro Central Heights 119  
Newington Causeway London

397 Metro Central Heights 119  
Newington Causeway London

378 Metro Central Heights 119  
Newington Causeway London

100 Metro Central Heights 119  
Newington Causeway London

76 Metro Central Heights 119 Newington Causeway London	Flat 23 Banks House Rockingham Estate Rockingham Street
49 Metro Central Heights 119 Newington Causeway London	Flat 15 Banks House Rockingham Estate Rockingham Street
45 Metro Central Heights 119 Newington Causeway London	Flat 56 Stephenson House Rockingham Estate Bath Terrace
339 Metro Central Heights 119 Newington Causeway London	56 Metro Central Heights 119 Newington Causeway London
28 Metro Central Heights 119 Newington Causeway London	44 Metro Central Heights 119 Newington Causeway London
8 Metro Central Heights 119 Newington Causeway London	371 Metro Central Heights 119 Newington Causeway London
Flat 5 Metro Central Heights 119 Newington Causeway	370 Metro Central Heights 119 Newington Causeway London
6-8 Tiverton Street London Southwark	366 Metro Central Heights 119 Newington Causeway London
293 Metro Central Heights 119 Newington Causeway London	364 Metro Central Heights 119 Newington Causeway London
264 Metro Central Heights 119 Newington Causeway London	358 Metro Central Heights 119 Newington Causeway London
257 Metro Central Heights 119 Newington Causeway London	343 Metro Central Heights 119 Newington Causeway London
Lancaster House 70 Newington Causeway London	338 Metro Central Heights 119 Newington Causeway London
244 Metro Central Heights 119 Newington Causeway London	329 Metro Central Heights 119 Newington Causeway London
378A Metro Central Heights 119 Newington Causeway London	34 Metro Central Heights 119 Newington Causeway London
101 Newington Causeway London Southwark	324 Metro Central Heights 119 Newington Causeway London
203 Metro Central Heights 119 Newington Causeway London	322 Metro Central Heights 119 Newington Causeway London
Flat 18 Rumford House Rockingham Estate Bath Terrace	308 Metro Central Heights 119 Newington Causeway London
Flat 6 Rumford House Rockingham Estate Bath Terrace	294 Metro Central Heights 119 Newington Causeway London
Flat 69 Stephenson House Rockingham Estate Bath Terrace	31 Metro Central Heights 119 Newington Causeway London

26 Metro Central Heights 119 Newington Causeway London	Flat 15 Rankine House Rockingham Estate Bath Terrace
25 Metro Central Heights 119 Newington Causeway London	Flat 15 Stephenson House Rockingham Estate Bath Terrace
271 Metro Central Heights 119 Newington Causeway London	Flat 7 Rennie House Rockingham Estate Bath Terrace
269 Metro Central Heights 119 Newington Causeway London	Flat 17 Rennie House Rockingham Estate Bath Terrace
254 Metro Central Heights 119 Newington Causeway London	Apartment 3304 251 Southwark Bridge Road London
230 Metro Central Heights 119 Newington Causeway London	Apartment 801 251 Southwark Bridge Road London
389A Metro Central Heights 119 Newington Causeway London	Apartment 504 251 Southwark Bridge Road London
348A Metro Central Heights 119 Newington Causeway London	Apartment 301 251 Southwark Bridge Road London
194 Metro Central Heights 119 Newington Causeway London	Apartment 3009 251 Southwark Bridge Road London
191 Metro Central Heights 119 Newington Causeway London	Apartment 2907 251 Southwark Bridge Road London
Flat 24 Rumford House Rockingham Estate Bath Terrace	Apartment 2804 251 Southwark Bridge Road London
Flat 21 Rumford House Rockingham Estate Bath Terrace	Apartment 2606 251 Southwark Bridge Road London
Flat 74 Stephenson House Rockingham Estate Bath Terrace	Apartment 2602 251 Southwark Bridge Road London
Flat 72 Stephenson House Rockingham Estate Bath Terrace	Apartment 1908 251 Southwark Bridge Road London
Flat 19 Banks House Rockingham Estate Rockingham Street	Apartment 1901 251 Southwark Bridge Road London
Flat 44 Stephenson House Rockingham Estate Bath Terrace	Apartment 1804 251 Southwark Bridge Road London
Flat 6 Stephenson House Rockingham Estate Bath Terrace	Apartment 1503 251 Southwark Bridge Road London
Flat 3 Stephenson House Rockingham Estate Bath Terrace	Apartment 1410 251 Southwark Bridge Road London
Flat 8 Rankine House Rockingham Estate Bath Terrace	Apartment 1305 251 Southwark Bridge Road London

Apartment 3702 251 Southwark Bridge  
Road London

Unit 4 Second Floor Lancaster House 70  
Newington Causeway

Flat 30 Pioneer Building 91 Newington  
Causeway

Flat 30 Stephenson House Rockingham  
Estate Bath Terrace

Flat 6 Rankine House Rockingham  
Estate Bath Terrace

Flat 1 Rankine House Rockingham  
Estate Bath Terrace

Flat 34 Telford House Rockingham  
Estate Tiverton Street

Flat 29 Telford House Rockingham  
Estate Tiverton Street

Flat 11 Telford House Rockingham  
Estate Tiverton Street

Flat 21 Stephenson House Rockingham  
Estate Bath Terrace

Flat 13 Stephenson House Rockingham  
Estate Bath Terrace

Flat 4 Rennie House Rockingham Estate  
Bath Terrace

Flat 23 Rennie House Rockingham  
Estate Bath Terrace

Apartment 3302 251 Southwark Bridge  
Road London

Apartment 701 251 Southwark Bridge  
Road London

Apartment 410 251 Southwark Bridge  
Road London

Apartment 407 251 Southwark Bridge  
Road London

Apartment 3004 251 Southwark Bridge  
Road London

Apartment 3001 251 Southwark Bridge  
Road London

Apartment 2904 251 Southwark Bridge  
Road London

Apartment 2901 251 Southwark Bridge  
Road London

Apartment 2806 251 Southwark Bridge  
Road London

Apartment 2801 251 Southwark Bridge  
Road London

Apartment 2706 251 Southwark Bridge  
Road London

Apartment 2110 251 Southwark Bridge  
Road London

Apartment 2609 251 Southwark Bridge  
Road London

Apartment 2604 251 Southwark Bridge  
Road London

Apartment 2406 251 Southwark Bridge  
Road London

Apartment 2404 251 Southwark Bridge  
Road London

Apartment 2207 251 Southwark Bridge  
Road London

Apartment 2106 251 Southwark Bridge  
Road London

Apartment 2101 251 Southwark Bridge  
Road London

Apartment 1810 251 Southwark Bridge  
Road London

Apartment 1805 251 Southwark Bridge  
Road London

Apartment 1103 251 Southwark Bridge  
Road London

Apartment 1008 251 Southwark Bridge  
Road London

Apartment 3408 251 Southwark Bridge  
Road London

Apartment 902 251 Southwark Bridge  
Road London

Apartment 809 251 Southwark Bridge Road London	Flat 12 Pioneer Building 91 Newington Causeway
Flat 35 Pioneer Building 91 Newington Causeway	Apartment 1001 251 Southwark Bridge Road London
Flat 26 Pioneer Building 91 Newington Causeway	Apartment 2008 251 Southwark Bridge Road London
Unit 1 Metro Central Heights 119 Newington Causeway	Flat 7 Rankine House Rockingham Estate Bath Terrace
Fourth Floor Lancaster House 70 Newington Causeway	Flat 7 Pioneer Building 91 Newington Causeway
Flat 10 Wellesley Court 15 Rockingham Street	Apartment 2003 251 Southwark Bridge Road London
477 Metro Central Heights 119 Newington Causeway London	Flat 23 Rankine House Rockingham Estate Bath Terrace
470 Metro Central Heights 119 Newington Causeway London	Apartment 3101 251 Southwark Bridge Road London
458 Metro Central Heights 119 Newington Causeway London	Flat 17 Banks House Rockingham Estate Rockingham Street
455 Metro Central Heights 119 Newington Causeway London	Flat 39 Stephenson House Rockingham Estate Bath Terrace
443 Metro Central Heights 119 Newington Causeway London	Flat 4 Stephenson House Rockingham Estate Bath Terrace
Flat 8 Rennie House Rockingham Estate Bath Terrace	Flat 34 Stephenson House Rockingham Estate Bath Terrace
Flat 23 Telford House Rockingham Estate Tiverton Street	Flat 42 Telford House Rockingham Estate Tiverton Street
Apartment 2710 251 Southwark Bridge Road London	Flat 32 Telford House Rockingham Estate Tiverton Street
Apartment 2608 251 Southwark Bridge Road London	Flat 16 Telford House Rockingham Estate Tiverton Street
Apartment 2307 251 Southwark Bridge Road London	Flat 19 Rennie House Rockingham Estate Bath Terrace
64 Metro Central Heights 119 Newington Causeway London	Flat 16 Rennie House Rockingham Estate Bath Terrace
Flat 31 Stephenson House Rockingham Estate Bath Terrace	Apartment 3306 251 Southwark Bridge Road London
Apartment 807 251 Southwark Bridge Road London	Apartment 3205 251 Southwark Bridge Road London

Apartment 803 251 Southwark Bridge  
Road London

Apartment 703 251 Southwark Bridge  
Road London

Apartment 507 251 Southwark Bridge  
Road London

Apartment 402 251 Southwark Bridge  
Road London

Apartment 3107 251 Southwark Bridge  
Road London

Apartment 2906 251 Southwark Bridge  
Road London

Apartment 2902 251 Southwark Bridge  
Road London

Apartment 2507 251 Southwark Bridge  
Road London

Apartment 2305 251 Southwark Bridge  
Road London

Apartment 2005 251 Southwark Bridge  
Road London

Apartment 1611 251 Southwark Bridge  
Road London

Apartment 1601 251 Southwark Bridge  
Road London

Apartment 1505 251 Southwark Bridge  
Road London

Apartment 1408 251 Southwark Bridge  
Road London

Apartment 1308 251 Southwark Bridge  
Road London

Apartment 1210 251 Southwark Bridge  
Road London

Apartment 1012 251 Southwark Bridge  
Road London

Apartment 3503 251 Southwark Bridge  
Road London

Apartment 3406 251 Southwark Bridge  
Road London

Apartment 3403 251 Southwark Bridge  
Road London

Flat 9 Pioneer Building 91 Newington  
Causeway

Flat 9 West Combe Apartments 123  
Newington Causeway

465 Metro Central Heights 119  
Newington Causeway London

431 Metro Central Heights 119  
Newington Causeway London

461 Metro Central Heights 119  
Newington Causeway London

438 Metro Central Heights 119  
Newington Causeway London

428 Metro Central Heights 119  
Newington Causeway London

424 Metro Central Heights 119  
Newington Causeway London

418 Metro Central Heights 119  
Newington Causeway London

415 Metro Central Heights 119  
Newington Causeway London

Unit 1 Railway Arch 99 Rockingham  
Street

1 Tiverton Street London Southwark

Flat 24 26 Arch Street London

Flat 23 26 Arch Street London

Flat 14 26 Arch Street London

Flat 8 26 Arch Street London

Flat 3 26 Arch Street London

Flat 47 Ceramic Building 87B Newington  
Causeway

Flat 45 Ceramic Building 87B Newington  
Causeway

Flat 36 Ceramic Building 87B Newington  
Causeway

Flat 35 Ceramic Building 87B Newington Causeway	Apartment 1801 251 Southwark Bridge Road London
Flat 17 Ceramic Building 87B Newington Causeway	Unit 4 Railway Arch 102A Rockingham Street
Flat 14 Ceramic Building 87A Newington Causeway	Flat 17 Telford House Rockingham Estate Tiverton Street
Flat 8 Ceramic Building 87A Newington Causeway	Flat 12 Telford House Rockingham Estate Tiverton Street
Flat 4 Ceramic Building 87A Newington Causeway	Flat 11 Rennie House Rockingham Estate Bath Terrace
Flat 3 Ceramic Building 87A Newington Causeway	Flat 10 Pioneer Building 91 Newington Causeway
Apartment 1704 251 Southwark Bridge Road London	Flat 1 Banks House Rockingham Estate Rockingham Street
Flat 39 Smeaton Court Arch Street	Flat 75 Stephenson House Rockingham Estate Bath Terrace
188 Metro Central Heights 119 Newington Causeway London	Flat 73 Stephenson House Rockingham Estate Bath Terrace
114 Metro Central Heights 119 Newington Causeway London	Flat 71 Stephenson House Rockingham Estate Bath Terrace
1 Metro Central Heights 119 Newington Causeway London	Flat 66 Stephenson House Rockingham Estate Bath Terrace
Apartment 608 251 Southwark Bridge Road London	Apartment 2203 251 Southwark Bridge Road London
Flat 67 Stephenson House Rockingham Estate Bath Terrace	Flat 8 Telford House Rockingham Estate Tiverton Street
Flat 13 Rankine House Rockingham Estate Bath Terrace	Flat 52 Stephenson House Rockingham Estate Bath Terrace
Flat 17 Pioneer Building 91 Newington Causeway	Flat 50 Stephenson House Rockingham Estate Bath Terrace
276 Metro Central Heights 119 Newington Causeway London	Flat 48 Stephenson House Rockingham Estate Bath Terrace
Apartment 709 251 Southwark Bridge Road London	Flat 43 Stephenson House Rockingham Estate Bath Terrace
Apartment 2708 251 Southwark Bridge Road London	Flat 41 Stephenson House Rockingham Estate Bath Terrace
144 Metro Central Heights 119 Newington Causeway London	Apartment 1604 251 Southwark Bridge Road London



Apartment 1504 251 Southwark Bridge  
Road London

Apartment 1411 251 Southwark Bridge  
Road London

Apartment 609 251 Southwark Bridge  
Road London

Apartment 509 251 Southwark Bridge  
Road London

Apartment 3504 251 Southwark Bridge  
Road London

Apartment 2908 251 Southwark Bridge  
Road London

Apartment 2707 251 Southwark Bridge  
Road London

Apartment 2705 251 Southwark Bridge  
Road London

Apartment 3208 251 Southwark Bridge  
Road London

Apartment 1110 251 Southwark Bridge  
Road London

Apartment 501 251 Southwark Bridge  
Road London

Apartment 403 251 Southwark Bridge  
Road London

Flat 19 Rumford House Rockingham  
Estate Bath Terrace

Apartment 2508 251 Southwark Bridge  
Road London

Flat 22 Stephenson House Rockingham  
Estate Bath Terrace

Flat 20 Stephenson House Rockingham  
Estate Bath Terrace

55 Metro Central Heights 119 Newington  
Causeway London

53 Metro Central Heights 119 Newington  
Causeway London

260 Metro Central Heights 119  
Newington Causeway London

251 Metro Central Heights 119  
Newington Causeway London

Flat 17A Telford House Rockingham  
Estate Tiverton Street

226 Metro Central Heights 119  
Newington Causeway London

221 Metro Central Heights 119  
Newington Causeway London

154 Metro Central Heights 119  
Newington Causeway London

141 Metro Central Heights 119  
Newington Causeway London

130 Metro Central Heights 119  
Newington Causeway London

192 Metro Central Heights 119  
Newington Causeway London

184 Metro Central Heights 119  
Newington Causeway London

162 Metro Central Heights 119  
Newington Causeway London

333 Metro Central Heights 119  
Newington Causeway London

412 Metro Central Heights 119  
Newington Causeway London

246 Metro Central Heights 119  
Newington Causeway London

401 Metro Central Heights 119  
Newington Causeway London

396 Metro Central Heights 119  
Newington Causeway London

Flat 54 Stephenson House Rockingham  
Estate Bath Terrace

Flat 46 Stephenson House Rockingham  
Estate Bath Terrace

Flat 28 Stephenson House Rockingham  
Estate Bath Terrace

Flat 3 Rankine House Rockingham  
Estate Bath Terrace

Flat 39 Telford House Rockingham Estate Tiverton Street	Apartment 1506 251 Southwark Bridge Road London
Flat 37 Telford House Rockingham Estate Tiverton Street	Apartment 1401 251 Southwark Bridge Road London
Flat 35 Telford House Rockingham Estate Tiverton Street	Apartment 1212 251 Southwark Bridge Road London
Flat 28 Telford House Rockingham Estate Tiverton Street	Apartment 1207 251 Southwark Bridge Road London
Flat 5 Rennie House Rockingham Estate Bath Terrace	Apartment 1206 251 Southwark Bridge Road London
Flat 20 Rennie House Rockingham Estate Bath Terrace	Apartment 1108 251 Southwark Bridge Road London
Apartment 3307 251 Southwark Bridge Road London	Apartment 1101 251 Southwark Bridge Road London
Apartment 610 251 Southwark Bridge Road London	Unit 6 Second Floor Lancaster House 70 Newington Causeway
Apartment 404 251 Southwark Bridge Road London	Unit 7 Second Floor Lancaster House 70 Newington Causeway
Apartment 2709 251 Southwark Bridge Road London	Flat 21 Pioneer Building 91 Newington Causeway
Apartment 2607 251 Southwark Bridge Road London	Third Floor Lancaster House 70 Newington Causeway
Apartment 2308 251 Southwark Bridge Road London	Flat 8 Wellesley Court 15 Rockingham Street
Apartment 2306 251 Southwark Bridge Road London	Flat 5 West Combe Apartments 123 Newington Causeway
Apartment 2209 251 Southwark Bridge Road London	Wetherspoons Metro Central Heights 119 Newington Causeway
Apartment 2004 251 Southwark Bridge Road London	Unit 4 Metro Central Heights 119 Newington Causeway
Apartment 1706 251 Southwark Bridge Road London	478 Metro Central Heights 119 Newington Causeway London
Apartment 1703 251 Southwark Bridge Road London	414 Metro Central Heights 119 Newington Causeway London
Apartment 1608 251 Southwark Bridge Road London	93 Newington Causeway London Southwark
Apartment 1508 251 Southwark Bridge Road London	Flat 31 26 Arch Street London
	Flat 15 26 Arch Street London

Flat 32 Ceramic Building 87B Newington Causeway	201 Metro Central Heights 119 Newington Causeway London
Flat 31 Ceramic Building 87B Newington Causeway	164 Metro Central Heights 119 Newington Causeway London
Flat 30 Ceramic Building 87B Newington Causeway	Flat 16 Pioneer Building 91 Newington Causeway
Flat 28 Ceramic Building 87B Newington Causeway	Flat 17 Smeaton Court Arch Street
Flat 24 Ceramic Building 87B Newington Causeway	Flat 23 Rumford House Rockingham Estate Bath Terrace
Flat 23 Ceramic Building 87B Newington Causeway	289 Metro Central Heights 119 Newington Causeway London
Flat 20 Ceramic Building 87B Newington Causeway	302 Metro Central Heights 119 Newington Causeway London
Flat 9 Rennie House Rockingham Estate Bath Terrace	Apartment 2303 251 Southwark Bridge Road London
Flat 12 Rennie House Rockingham Estate Bath Terrace	Apartment 2402 251 Southwark Bridge Road London
256 Metro Central Heights 119 Newington Causeway London	Flat 12 Rankine House Rockingham Estate Bath Terrace
210 Metro Central Heights 119 Newington Causeway London	311 Metro Central Heights 119 Newington Causeway London
160 Metro Central Heights 119 Newington Causeway London	Flat 20 Telford House Rockingham Estate Tiverton Street
92 Metro Central Heights 119 Newington Causeway London	Flat 5 Pioneer Building 91 Newington Causeway
Flat 9 Rumford House Rockingham Estate Bath Terrace	Flat 24 Banks House Rockingham Estate Rockingham Street
Flat 45 Smeaton Court Arch Street	Apartment 2208 251 Southwark Bridge Road London
Apartment 3207 251 Southwark Bridge Road London	Apartment 2206 251 Southwark Bridge Road London
27 Metro Central Heights 119 Newington Causeway London	Flat 19 Rankine House Rockingham Estate Bath Terrace
Flat 42 Stephenson House Rockingham Estate Bath Terrace	Apartment 1607 251 Southwark Bridge Road London
Flat 14 Rennie House Rockingham Estate Bath Terrace	Apartment 1208 251 Southwark Bridge Road London

Apartment 704 251 Southwark Bridge  
Road London

Apartment 604 251 Southwark Bridge  
Road London

Apartment 2802 251 Southwark Bridge  
Road London

Apartment 3404 251 Southwark Bridge  
Road London

Apartment 1011 251 Southwark Bridge  
Road London

441 Metro Central Heights 119  
Newington Causeway London

439 Metro Central Heights 119  
Newington Causeway London

436 Metro Central Heights 119  
Newington Causeway London

425 Metro Central Heights 119  
Newington Causeway London

416 Metro Central Heights 119  
Newington Causeway London

Flat 17 26 Arch Street London

Flat 4 26 Arch Street London

Flat 21 Ceramic Building 87B Newington  
Causeway

Flat 16 Ceramic Building 87A Newington  
Causeway

Flat 13 Ceramic Building 87A Newington  
Causeway

Flat 11 Ceramic Building 87A Newington  
Causeway

Flat 40 Smeaton Court Arch Street

Flat 1 Smeaton Court Arch Street

Flat 7 Telford House Rockingham Estate  
Tiverton Street

Flat 26 Telford House Rockingham  
Estate Tiverton Street

284 Metro Central Heights 119  
Newington Causeway London

Apartment 1812 251 Southwark Bridge  
Road London

33 Metro Central Heights 119 Newington  
Causeway London

Apartment 2808 251 Southwark Bridge  
Road London

410 Metro Central Heights 119  
Newington Causeway London

20 Metro Central Heights 119 Newington  
Causeway London

Flat 11 Stephenson House Rockingham  
Estate Bath Terrace

Flat 5 Telford House Rockingham Estate  
Tiverton Street

232 Metro Central Heights 119  
Newington Causeway London

228 Metro Central Heights 119  
Newington Causeway London

Apartment 2009 251 Southwark Bridge  
Road London

Flat 15 Pioneer Building 91 Newington  
Causeway

Flat 22 Banks House Rockingham Estate  
Rockingham Street

Apartment 1907 251 Southwark Bridge  
Road London

Flat 25 Rankine House Rockingham  
Estate Bath Terrace

Flat 10 Rankine House Rockingham  
Estate Bath Terrace

Apartment 3802 251 Southwark Bridge  
Road London

Flat 35 Stephenson House Rockingham  
Estate Bath Terrace

Apartment 1702 251 Southwark Bridge  
Road London

Apartment 1509 251 Southwark Bridge  
Road London

Apartment 805 251 Southwark Bridge  
Road London

Apartment 3501 251 Southwark Bridge  
Road London

Flat 7 Rumford House Rockingham  
Estate Bath Terrace

Apartment 2905 251 Southwark Bridge  
Road London

Apartment 1105 251 Southwark Bridge  
Road London

Apartment 1004 251 Southwark Bridge  
Road London

Apartment 2610 251 Southwark Bridge  
Road London

Apartment 1009 251 Southwark Bridge  
Road London

Flat 25 Rumford House Rockingham  
Estate Bath Terrace

Apartment 2702 251 Southwark Bridge  
Road London

Apartment 2405 251 Southwark Bridge  
Road London

Flat 29 Stephenson House Rockingham  
Estate Bath Terrace

Flat 24 Pioneer Building 91 Newington  
Causeway

5 Gaunt Street London Southwark

303 Metro Central Heights 119  
Newington Causeway London

300 Metro Central Heights 119  
Newington Causeway London

111 Metro Central Heights 119  
Newington Causeway London

94 Metro Central Heights 119 Newington  
Causeway London

69 Metro Central Heights 119 Newington  
Causeway London

Unit 3 Second Floor Lancaster House 70  
Newington Causeway

278 Metro Central Heights 119  
Newington Causeway London

63 Metro Central Heights 119 Newington  
Causeway London

43 Metro Central Heights 119 Newington  
Causeway London

263 Metro Central Heights 119  
Newington Causeway London

243 Metro Central Heights 119  
Newington Causeway London

223 Metro Central Heights 119  
Newington Causeway London

152 Metro Central Heights 119  
Newington Causeway London

172 Metro Central Heights 119  
Newington Causeway London

393 Metro Central Heights 119  
Newington Causeway London

348 Metro Central Heights 119  
Newington Causeway London

346 Metro Central Heights 119  
Newington Causeway London

23 Metro Central Heights 119 Newington  
Causeway London

Flat 8 West Combe Apartments 123  
Newington Causeway

Flat 3 Smeaton Court Arch Street

Flat 15 Smeaton Court Arch Street

Flat 11 Smeaton Court Arch Street

Flat 10 Smeaton Court Arch Street

176 Metro Central Heights 119  
Newington Causeway London

173 Metro Central Heights 119  
Newington Causeway London

153 Metro Central Heights 119  
Newington Causeway London

126 Metro Central Heights 119  
Newington Causeway London

239 Metro Central Heights 119  
Newington Causeway London

89 Metro Central Heights 119 Newington  
Causeway London

120 Metro Central Heights 119  
Newington Causeway London

380 Metro Central Heights 119  
Newington Causeway London

97 Metro Central Heights 119 Newington  
Causeway London

93 Metro Central Heights 119 Newington  
Causeway London

86 Metro Central Heights 119 Newington  
Causeway London

78 Metro Central Heights 119 Newington  
Causeway London

Apartment 1809 251 Southwark Bridge  
Road London

Apartment 1409 251 Southwark Bridge  
Road London

Apartment 1309 251 Southwark Bridge  
Road London

Apartment 1304 251 Southwark Bridge  
Road London

Apartment 802 251 Southwark Bridge  
Road London

Apartment 707 251 Southwark Bridge  
Road London

Apartment 2903 251 Southwark Bridge  
Road London

Apartment 303 251 Southwark Bridge  
Road London

Apartment 2407 251 Southwark Bridge  
Road London

Flat 6 Rennie House Rockingham Estate  
Bath Terrace

Flat 32 Pioneer Building 91 Newington  
Causeway

Flat 13 Smeaton Court Arch Street  
Basement To Seventh Floors Eileen  
House 80-94 Newington Causeway

Flat 8 Smeaton Court Arch Street

96 Metro Central Heights 119 Newington  
Causeway London

9 Metro Central Heights 119 Newington  
Causeway London

46 Metro Central Heights 119 Newington  
Causeway London

255 Metro Central Heights 119  
Newington Causeway London

249 Metro Central Heights 119  
Newington Causeway London

241 Metro Central Heights 119  
Newington Causeway London

237 Metro Central Heights 119  
Newington Causeway London

235 Metro Central Heights 119  
Newington Causeway London

157 Metro Central Heights 119  
Newington Causeway London

146 Metro Central Heights 119  
Newington Causeway London

167 Metro Central Heights 119  
Newington Causeway London

345 Metro Central Heights 119  
Newington Causeway London

379 Metro Central Heights 119  
Newington Causeway London

Flat 3 West Combe Apartments 123  
Newington Causeway

Flat 52 Smeaton Court Arch Street

Flat 51 Smeaton Court Arch Street

Flat 4 Smeaton Court Arch Street

Flat 18 Smeaton Court Arch Street

Flat 29 Smeaton Court Arch Street

Flat 24 Smeaton Court Arch Street

Flat 34A Telford House Rockingham  
Estate Tiverton Street

405 Metro Central Heights 119  
Newington Causeway London

352 Metro Central Heights 119  
Newington Causeway London

129 Metro Central Heights 119  
Newington Causeway London

186 Metro Central Heights 119  
Newington Causeway London

395 Metro Central Heights 119  
Newington Causeway London

388 Metro Central Heights 119  
Newington Causeway London

109 Metro Central Heights 119  
Newington Causeway London

Apartment 2605 251 Southwark Bridge  
Road London

Apartment 2603 251 Southwark Bridge  
Road London

Apartment 2502 251 Southwark Bridge  
Road London

Apartment 2410 251 Southwark Bridge  
Road London

Apartment 2304 251 Southwark Bridge  
Road London

Flat 27 Stephenson House Rockingham  
Estate Bath Terrace

Flat 29 Pioneer Building 91 Newington  
Causeway

Flat 32 Smeaton Court Arch Street

Flat 26 Smeaton Court Arch Street

316 Metro Central Heights 119  
Newington Causeway London

305 Metro Central Heights 119  
Newington Causeway London

103 Metro Central Heights 119  
Newington Causeway London

91 Metro Central Heights 119 Newington  
Causeway London

74 Metro Central Heights 119 Newington  
Causeway London

Unit 5 Second Floor Lancaster House 70  
Newington Causeway

21 Metro Central Heights 119 Newington  
Causeway London

275 Metro Central Heights 119  
Newington Causeway London

270 Metro Central Heights 119  
Newington Causeway London

41 Metro Central Heights 119 Newington  
Causeway London

38 Metro Central Heights 119 Newington  
Causeway London

Arch 88 91A Newington Causeway  
London

136 Metro Central Heights 119  
Newington Causeway London

318 Metro Central Heights 119  
Newington Causeway London

330 Metro Central Heights 119  
Newington Causeway London

224 Metro Central Heights 119  
Newington Causeway London

Flat 2 West Combe Apartments 123  
Newington Causeway

399 Metro Central Heights 119  
Newington Causeway London

391 Metro Central Heights 119  
Newington Causeway London

340 Metro Central Heights 119  
Newington Causeway London

Flat 4 Wellesley Court 15 Rockingham Street	280 Metro Central Heights 119 Newington Causeway London
Flat 36 Smeaton Court Arch Street	279 Metro Central Heights 119 Newington Causeway London
Flat 27 Smeaton Court Arch Street	262 Metro Central Heights 119 Newington Causeway London
Flat 25 Smeaton Court Arch Street	236 Metro Central Heights 119 Newington Causeway London
Flat 6 Smeaton Court Arch Street	222 Metro Central Heights 119 Newington Causeway London
250 Southwark Bridge Road London Southwark	368A Metro Central Heights 119 Newington Causeway London
337 Metro Central Heights 119 Newington Causeway London	207 Metro Central Heights 119 Newington Causeway London
145 Metro Central Heights 119 Newington Causeway London	Flat 3 Rumford House Rockingham Estate Bath Terrace
128 Metro Central Heights 119 Newington Causeway London	Flat 10 Rumford House Rockingham Estate Bath Terrace
62 Metro Central Heights 119 Newington Causeway London	Flat 65 Stephenson House Rockingham Estate Bath Terrace
368 Metro Central Heights 119 Newington Causeway London	Flat 28 Banks House Rockingham Estate Rockingham Street
353 Metro Central Heights 119 Newington Causeway London	Flat 2 Banks House Rockingham Estate Rockingham Street
317 Metro Central Heights 119 Newington Causeway London	Flat 13 Banks House Rockingham Estate Rockingham Street
312 Metro Central Heights 119 Newington Causeway London	Flat 53 Stephenson House Rockingham Estate Bath Terrace
301 Metro Central Heights 119 Newington Causeway London	Flat 49 Stephenson House Rockingham Estate Bath Terrace
298 Metro Central Heights 119 Newington Causeway London	Flat 24 Rankine House Rockingham Estate Bath Terrace
296 Metro Central Heights 119 Newington Causeway London	Flat 18 Rankine House Rockingham Estate Bath Terrace
22 Metro Central Heights 119 Newington Causeway London	Flat 9 Telford House Rockingham Estate Tiverton Street
19 Metro Central Heights 119 Newington Causeway London	Flat 30 Telford House Rockingham Estate Tiverton Street
12 Metro Central Heights 119 Newington Causeway London	
285 Metro Central Heights 119 Newington Causeway London	



Flat 24 Telford House Rockingham  
Estate Tiverton Street

Flat 14 Telford House Rockingham  
Estate Tiverton Street

Flat 23 Stephenson House Rockingham  
Estate Bath Terrace

Apartment 806 251 Southwark Bridge  
Road London

Apartment 603 251 Southwark Bridge  
Road London

Apartment 505 251 Southwark Bridge  
Road London

Apartment 502 251 Southwark Bridge  
Road London

Apartment 2809 251 Southwark Bridge  
Road London

Apartment 2601 251 Southwark Bridge  
Road London

Apartment 2409 251 Southwark Bridge  
Road London

Flat 48 Ceramic Building 87B Newington  
Causeway

Flat 44 Ceramic Building 87B Newington  
Causeway

Flat 19 Ceramic Building 87B Newington  
Causeway

Flat 5 Ceramic Building 87A Newington  
Causeway

Travel Lodge Hotel Ceramic Building 87  
Newington Causeway London

42A Tarn Street London Southwark

400 Metro Central Heights 119  
Newington Causeway London

332 Metro Central Heights 119  
Newington Causeway London

Apartment 1005 251 Southwark Bridge  
Road London

Flat 40 Stephenson House Rockingham  
Estate Bath Terrace

233 Metro Central Heights 119  
Newington Causeway London

182 Metro Central Heights 119  
Newington Causeway London

107 Metro Central Heights 119  
Newington Causeway London

104 Metro Central Heights 119  
Newington Causeway London

99 Metro Central Heights 119 Newington  
Causeway London

87 Metro Central Heights 119 Newington  
Causeway London

73 Metro Central Heights 119 Newington  
Causeway London

50 Metro Central Heights 119 Newington  
Causeway London

363 Metro Central Heights 119  
Newington Causeway London

344 Metro Central Heights 119  
Newington Causeway London

Flat 3 Metro Central Heights 119  
Newington Causeway

290 Metro Central Heights 119  
Newington Causeway London

250 Metro Central Heights 119  
Newington Causeway London

217 Metro Central Heights 119  
Newington Causeway London

215 Metro Central Heights 119  
Newington Causeway London

185 Metro Central Heights 119  
Newington Causeway London

Flat 17 Rumford House Rockingham  
Estate Bath Terrace

Flat 13 Rumford House Rockingham  
Estate Bath Terrace

Flat 70 Stephenson House Rockingham Estate Bath Terrace	Apartment 2001 251 Southwark Bridge Road London
Flat 36 Stephenson House Rockingham Estate Bath Terrace	Apartment 1906 251 Southwark Bridge Road London
Flat 32 Stephenson House Rockingham Estate Bath Terrace	Apartment 1711 251 Southwark Bridge Road London
Flat 2 Rankine House Rockingham Estate Bath Terrace	Apartment 1606 251 Southwark Bridge Road London
Flat 18 Telford House Rockingham Estate Tiverton Street	Apartment 1405 251 Southwark Bridge Road London
Flat 18 Stephenson House Rockingham Estate Bath Terrace	Apartment 1312 251 Southwark Bridge Road London
Flat 21 Rennie House Rockingham Estate Bath Terrace	Apartment 1202 251 Southwark Bridge Road London
Apartment 3201 251 Southwark Bridge Road London	Apartment 1109 251 Southwark Bridge Road London
Apartment 710 251 Southwark Bridge Road London	Apartment 1010 251 Southwark Bridge Road London
Apartment 708 251 Southwark Bridge Road London	Apartment 1003 251 Southwark Bridge Road London
Apartment 705 251 Southwark Bridge Road London	Apartment 910 251 Southwark Bridge Road London
Apartment 607 251 Southwark Bridge Road London	384 Metro Central Heights 119 Newington Causeway London
Apartment 510 251 Southwark Bridge Road London	102 Metro Central Heights 119 Newington Causeway London
Apartment 3105 251 Southwark Bridge Road London	54 Metro Central Heights 119 Newington Causeway London
Apartment 3102 251 Southwark Bridge Road London	335 Metro Central Heights 119 Newington Causeway London
Apartment 3007 251 Southwark Bridge Road London	304 Metro Central Heights 119 Newington Causeway London
Apartment 2506 251 Southwark Bridge Road London	7 Metro Central Heights 119 Newington Causeway London
Apartment 2204 251 Southwark Bridge Road London	287 Metro Central Heights 119 Newington Causeway London
Apartment 2105 251 Southwark Bridge Road London	274 Metro Central Heights 119 Newington Causeway London

266 Metro Central Heights 119 Newington Causeway London	Apartment 401 251 Southwark Bridge Road London
247 Metro Central Heights 119 Newington Causeway London	Apartment 3104 251 Southwark Bridge Road London
242 Metro Central Heights 119 Newington Causeway London	Apartment 2803 251 Southwark Bridge Road London
240 Metro Central Heights 119 Newington Causeway London	Apartment 2703 251 Southwark Bridge Road London
238 Metro Central Heights 119 Newington Causeway London	Apartment 2503 251 Southwark Bridge Road London
220 Metro Central Heights 119 Newington Causeway London	Apartment 2408 251 Southwark Bridge Road London
183 Metro Central Heights 119 Newington Causeway London	Apartment 2403 251 Southwark Bridge Road London
Flat 22 Rumford House Rockingham Estate Bath Terrace	Apartment 2401 251 Southwark Bridge Road London
Flat 5 Banks House Rockingham Estate Rockingham Street	Apartment 2301 251 Southwark Bridge Road London
Flat 3 Banks House Rockingham Estate Rockingham Street	Apartment 1905 251 Southwark Bridge Road London
Flat 10 Banks House Rockingham Estate Rockingham Street	Apartment 1808 251 Southwark Bridge Road London
Flat 47 Stephenson House Rockingham Estate Bath Terrace	Apartment 1712 251 Southwark Bridge Road London
Flat 37 Stephenson House Rockingham Estate Bath Terrace	Apartment 1701 251 Southwark Bridge Road London
Flat 2 Telford House Rockingham Estate Tiverton Street	Apartment 1605 251 Southwark Bridge Road London
Flat 25 Rennie House Rockingham Estate Bath Terrace	Apartment 1603 251 Southwark Bridge Road London
Apartment 3401 251 Southwark Bridge Road London	Apartment 1501 251 Southwark Bridge Road London
Apartment 3301 251 Southwark Bridge Road London	Apartment 1407 251 Southwark Bridge Road London
Apartment 3204 251 Southwark Bridge Road London	Apartment 1111 251 Southwark Bridge Road London
Apartment 605 251 Southwark Bridge Road London	Apartment 1007 251 Southwark Bridge Road London

Apartment 2103 251 Southwark Bridge Road London	Flat 5 Wellesley Court 15 Rockingham Street
Apartment 2002 251 Southwark Bridge Road London	Flat 3 Wellesley Court 15 Rockingham Street
Apartment 1802 251 Southwark Bridge Road London	464 Metro Central Heights 119 Newington Causeway London
Apartment 1709 251 Southwark Bridge Road London	480 Metro Central Heights 119 Newington Causeway London
Apartment 1707 251 Southwark Bridge Road London	434 Metro Central Heights 119 Newington Causeway London
Apartment 1512 251 Southwark Bridge Road London	433 Metro Central Heights 119 Newington Causeway London
Apartment 1403 251 Southwark Bridge Road London	426 Metro Central Heights 119 Newington Causeway London
Apartment 1209 251 Southwark Bridge Road London	Unit 3 Metro Central Heights 119 Newington Causeway
Apartment 1204 251 Southwark Bridge Road London	463 Metro Central Heights 119 Newington Causeway London
Apartment 1002 251 Southwark Bridge Road London	Flat 25 26 Arch Street London
Apartment 909 251 Southwark Bridge Road London	Flat 26 26 Arch Street London
Apartment 3601 251 Southwark Bridge Road London	Flat 12 26 Arch Street London
Apartment 904 251 Southwark Bridge Road London	Flat 10 26 Arch Street London
Flat 19 Pioneer Building 91 Newington Causeway	Flat 9 26 Arch Street London
Flat 14 Pioneer Building 91 Newington Causeway	Flat 6 26 Arch Street London
Flat 8 Pioneer Building 91 Newington Causeway	Flat 5 26 Arch Street London
Flat 6 Pioneer Building 91 Newington Causeway	Flat 1 26 Arch Street London
Flat 1 Pioneer Building 91 Newington Causeway	Flat 42 Ceramic Building 87B Newington Causeway
Sixth Floor Lancaster House 70 Newington Causeway	Flat 38 Ceramic Building 87B Newington Causeway
	Flat 34 Ceramic Building 87B Newington Causeway
	Flat 12 Ceramic Building 87A Newington Causeway
	Flat 1 Ceramic Building 87A Newington Causeway

75 Metro Central Heights 119 Newington Causeway London

Apartment 1510 251 Southwark Bridge Road London

Flat 16 Rankine House Rockingham Estate Bath Terrace

Flat 44 Smeaton Court Arch Street

Flat 43 Smeaton Court Arch Street

Apartment 2309 251 Southwark Bridge Road London

Apartment 2201 251 Southwark Bridge Road London

137 Metro Central Heights 119 Newington Causeway London

Flat 2 Rumford House Rockingham Estate Bath Terrace

Apartment 1211 251 Southwark Bridge Road London

Apartment 3402 251 Southwark Bridge Road London

Apartment 3502 251 Southwark Bridge Road London

Flat 26 Banks House Rockingham Estate Rockingham Street

156 Metro Central Heights 119 Newington Causeway London

90 Metro Central Heights 119 Newington Causeway London

Apartment 1104 251 Southwark Bridge Road London

Apartment 905 251 Southwark Bridge Road London

365 Metro Central Heights 119 Newington Causeway London

Apartment 1306 251 Southwark Bridge Road London

Flat 16 Banks House Rockingham Estate Rockingham Street

211 Metro Central Heights 119 Newington Causeway London

Flat 5 Rumford House Rockingham Estate Bath Terrace

Flat 9 Rankine House Rockingham Estate Bath Terrace

Flat 29 Banks House Rockingham Estate Rockingham Street

Apartment 2107 251 Southwark Bridge Road London

Apartment 2104 251 Southwark Bridge Road London

Apartment 2102 251 Southwark Bridge Road London

Apartment 903 251 Southwark Bridge Road London

Flat 4 Telford House Rockingham Estate Tiverton Street

Flat 38 Telford House Rockingham Estate Tiverton Street

Apartment 3701 251 Southwark Bridge Road London

Flat 55 Stephenson House Rockingham Estate Bath Terrace

Apartment 1311 251 Southwark Bridge Road London

Apartment 901 251 Southwark Bridge Road London

Apartment 606 251 Southwark Bridge Road London

Apartment 506 251 Southwark Bridge Road London

Apartment 3407 251 Southwark Bridge Road London

Apartment 3103 251 Southwark Bridge Road London

Apartment 1112 251 Southwark Bridge Road London

Apartment 305 251 Southwark Bridge Road London	Flat 13 Pioneer Building 91 Newington Causeway
Flat 1 Rumford House Rockingham Estate Bath Terrace	Flat 1 Wellesley Court 15 Rockingham Street
Flat 12 Stephenson House Rockingham Estate Bath Terrace	481 Metro Central Heights 119 Newington Causeway London
Flat 15 Rennie House Rockingham Estate Bath Terrace	479 Metro Central Heights 119 Newington Causeway London
Flat 22 Pioneer Building 91 Newington Causeway	467 Metro Central Heights 119 Newington Causeway London
Unit 2 Railway Arch 100 Rockingham Street	460 Metro Central Heights 119 Newington Causeway London
106 Metro Central Heights 119 Newington Causeway London	457 Metro Central Heights 119 Newington Causeway London
83 Metro Central Heights 119 Newington Causeway London	445 Metro Central Heights 119 Newington Causeway London
272 Metro Central Heights 119 Newington Causeway London	429 Metro Central Heights 119 Newington Causeway London
48 Metro Central Heights 119 Newington Causeway London	427 Metro Central Heights 119 Newington Causeway London
409A Metro Central Heights 119 Newington Causeway London	423 Metro Central Heights 119 Newington Causeway London
398A Metro Central Heights 119 Newington Causeway London	Flat 33 26 Arch Street London
138 Metro Central Heights 119 Newington Causeway London	Flat 29 26 Arch Street London
127 Metro Central Heights 119 Newington Causeway London	Flat 21 26 Arch Street London
Apartment 907 251 Southwark Bridge Road London	Flat 20 26 Arch Street London
241 Southwark Bridge Road London Southwark	Flat 11 26 Arch Street London
Apartment 3801 251 Southwark Bridge Road London	Flat 7 26 Arch Street London
Apartment 3604 251 Southwark Bridge Road London	Flat 41 Ceramic Building 87B Newington Causeway
Flat 28 Pioneer Building 91 Newington Causeway	Flat 40 Ceramic Building 87B Newington Causeway
	Flat 37 Ceramic Building 87B Newington Causeway
	Flat 22 Ceramic Building 87B Newington Causeway

Flat 10 Ceramic Building 87A Newington Causeway

Flat 21 Smeaton Court Arch Street

355 Metro Central Heights 119 Newington Causeway London

Apartment 1201 251 Southwark Bridge Road London

327 Metro Central Heights 119 Newington Causeway London

Flat 47 Smeaton Court Arch Street

Apartment 508 251 Southwark Bridge Road London

Apartment 304 251 Southwark Bridge Road London

Flat 37 Smeaton Court Arch Street

68 Metro Central Heights 119 Newington Causeway London

77-85 Newington Causeway London Southwark

Apartment 3505 251 Southwark Bridge Road London

113 Metro Central Heights 119 Newington Causeway London

118 Metro Central Heights 119 Newington Causeway London

Flat 37 Pioneer Building 91 Newington Causeway

Apartment 908 251 Southwark Bridge Road London

Flat 57 Stephenson House Rockingham Estate Bath Terrace

Apartment 1303 251 Southwark Bridge Road London

Apartment 1106 251 Southwark Bridge Road London

243 Southwark Bridge Road London Southwark

Apartment 3602 251 Southwark Bridge Road London

Apartment 3405 251 Southwark Bridge Road London

Unit 2 Second Floor Lancaster House 70 Newington Causeway

Flat 33 Pioneer Building 91 Newington Causeway

Flat 31 Pioneer Building 91 Newington Causeway

Flat 11 Pioneer Building 91 Newington Causeway

First Floor Lancaster House 70 Newington Causeway

Unit 2 5-9 Rockingham Street London

Flat 6 Wellesley Court 15 Rockingham Street

Flat 7 West Combe Apartments 123 Newington Causeway

474 Metro Central Heights 119 Newington Causeway London

469 Metro Central Heights 119 Newington Causeway London

447 Metro Central Heights 119 Newington Causeway London

440 Metro Central Heights 119 Newington Causeway London

437 Metro Central Heights 119 Newington Causeway London

435 Metro Central Heights 119 Newington Causeway London

419 Metro Central Heights 119 Newington Causeway London

Apartment 810 251 Southwark Bridge Road London

Flat 36 Pioneer Building 91 Newington Causeway

Flat 23 Pioneer Building 91 Newington Causeway	Apartment 3005 251 Southwark Bridge Road London
Flat 3 Pioneer Building 91 Newington Causeway	Apartment 2509 251 Southwark Bridge Road London
Flat 4 West Combe Apartments 123 Newington Causeway	Apartment 1909 251 Southwark Bridge Road London
Flat 1 West Combe Apartments 123 Newington Causeway	Apartment 1708 251 Southwark Bridge Road London
471 Metro Central Heights 119 Newington Causeway London	Apartment 409 251 Southwark Bridge Road London
459 Metro Central Heights 119 Newington Causeway London	193 Metro Central Heights 119 Newington Causeway London
449 Metro Central Heights 119 Newington Causeway London	Flat 14 Banks House Rockingham Estate Rockingham Street
420 Metro Central Heights 119 Newington Causeway London	Apartment 1507 251 Southwark Bridge Road London
89 Newington Causeway London Southwark	Flat 34 Smeaton Court Arch Street
Flat 27 26 Arch Street London	383 Metro Central Heights 119 Newington Causeway London
Flat 13 26 Arch Street London	Flat 15 Rumford House Rockingham Estate Bath Terrace
Flat 18 Ceramic Building 87B Newington Causeway	Apartment 1807 251 Southwark Bridge Road London
Flat 9 Ceramic Building 87A Newington Causeway	307 Metro Central Heights 119 Newington Causeway London
376 Metro Central Heights 119 Newington Causeway London	Apartment 906 251 Southwark Bridge Road London
Apartment 1307 251 Southwark Bridge Road London	Apartment 808 251 Southwark Bridge Road London
Flat 62 Stephenson House Rockingham Estate Bath Terrace	281 Metro Central Heights 119 Newington Causeway London
282 Metro Central Heights 119 Newington Causeway London	Apartment 3308 251 Southwark Bridge Road London
Flat 25 Pioneer Building 91 Newington Causeway	35 Metro Central Heights 119 Newington Causeway London
Flat 4 Pioneer Building 91 Newington Causeway	Apartment 1511 251 Southwark Bridge Road London
47 Metro Central Heights 119 Newington Causeway London	



Flat 14 Stephenson House Rockingham Estate Bath Terrace	Arches 104 To 105 New Kent Road London
Flat 25 Telford House Rockingham Estate Tiverton Street	150 Metro Central Heights 119 Newington Causeway London
Flat 2 Pioneer Building 91 Newington Causeway	Flat 36 Telford House Rockingham Estate Tiverton Street
Flat 6 Banks House Rockingham Estate Rockingham Street	Flat 33 Telford House Rockingham Estate Tiverton Street
Flat 27 Banks House Rockingham Estate Rockingham Street	Flat 31 Telford House Rockingham Estate Tiverton Street
Flat 24 Stephenson House Rockingham Estate Bath Terrace	Flat 20 Banks House Rockingham Estate Rockingham Street
Flat 21 Telford House Rockingham Estate Tiverton Street	Apartment 2109 251 Southwark Bridge Road London
Flat 38 Pioneer Building 91 Newington Causeway	Apartment 1902 251 Southwark Bridge Road London
409 Metro Central Heights 119 Newington Causeway London	Flat 5 Rankine House Rockingham Estate Bath Terrace
309 Metro Central Heights 119 Newington Causeway London	Flat 17 Rankine House Rockingham Estate Bath Terrace
367 Metro Central Heights 119 Newington Causeway London	100 Newington Causeway London Southwark
373 Metro Central Heights 119 Newington Causeway London	Apartment 3006 251 Southwark Bridge Road London
205 Metro Central Heights 119 Newington Causeway London	Apartment 3003 251 Southwark Bridge Road London
Apartment 3202 251 Southwark Bridge Road London	Apartment 2910 251 Southwark Bridge Road London
Apartment 1610 251 Southwark Bridge Road London	Flat 61 Stephenson House Rockingham Estate Bath Terrace
42 Metro Central Heights 119 Newington Causeway London	Flat 59 Stephenson House Rockingham Estate Bath Terrace
Flat 6 Telford House Rockingham Estate Tiverton Street	Flat 45 Stephenson House Rockingham Estate Bath Terrace
Apartment 503 251 Southwark Bridge Road London	Flat 9 Stephenson House Rockingham Estate Bath Terrace
Flat 7 Stephenson House Rockingham Estate Bath Terrace	Apartment 1811 251 Southwark Bridge Road London

Apartment 1806 251 Southwark Bridge Road London	411 Metro Central Heights 119 Newington Causeway London
Apartment 1803 251 Southwark Bridge Road London	406 Metro Central Heights 119 Newington Causeway London
Apartment 1602 251 Southwark Bridge Road London	362 Metro Central Heights 119 Newington Causeway London
Apartment 702 251 Southwark Bridge Road London	342 Metro Central Heights 119 Newington Causeway London
Apartment 3203 251 Southwark Bridge Road London	171 Metro Central Heights 119 Newington Causeway London
Apartment 3106 251 Southwark Bridge Road London	67 Metro Central Heights 119 Newington Causeway London
Apartment 1203 251 Southwark Bridge Road London	Flat 9 Wellesley Court 15 Rockingham Street
Flat 20 Rumford House Rockingham Estate Bath Terrace	Flat 48 Smeaton Court Arch Street
Apartment 2505 251 Southwark Bridge Road London	Flat 41 Smeaton Court Arch Street
Flat 3 Rennie House Rockingham Estate Bath Terrace	Flat 33 Smeaton Court Arch Street
Flat 24 Rennie House Rockingham Estate Bath Terrace	Flat 12 Smeaton Court Arch Street
Flat 2 Rennie House Rockingham Estate Bath Terrace	179 Metro Central Heights 119 Newington Causeway London
Apartment 2210 251 Southwark Bridge Road London	174 Metro Central Heights 119 Newington Causeway London
121 Metro Central Heights 119 Newington Causeway London	168 Metro Central Heights 119 Newington Causeway London
119 Metro Central Heights 119 Newington Causeway London	166 Metro Central Heights 119 Newington Causeway London
190 Metro Central Heights 119 Newington Causeway London	151 Metro Central Heights 119 Newington Causeway London
336 Metro Central Heights 119 Newington Causeway London	142 Metro Central Heights 119 Newington Causeway London
326 Metro Central Heights 119 Newington Causeway London	200 Metro Central Heights 119 Newington Causeway London
277 Metro Central Heights 119 Newington Causeway London	413 Metro Central Heights 119 Newington Causeway London
	117 Metro Central Heights 119 Newington Causeway London
	115 Metro Central Heights 119 Newington Causeway London

394 Metro Central Heights 119  
Newington Causeway London

392 Metro Central Heights 119  
Newington Causeway London

389 Metro Central Heights 119  
Newington Causeway London

105 Metro Central Heights 119  
Newington Causeway London

40 Metro Central Heights 119 Newington  
Causeway London

Unit 5 Metro Central Heights 119  
Newington Causeway

Flat 32 26 Arch Street London

Flat 28 26 Arch Street London

Flat 18 26 Arch Street London

Flat 16 26 Arch Street London

Flat 2 26 Arch Street London

Flat 46 Ceramic Building 87B Newington  
Causeway

Flat 43 Ceramic Building 87B Newington  
Causeway

Flat 39 Ceramic Building 87B Newington  
Causeway

Flat 33 Ceramic Building 87B Newington  
Causeway

Flat 29 Ceramic Building 87B Newington  
Causeway

Flat 27 Ceramic Building 87B Newington  
Causeway

Flat 26 Ceramic Building 87B Newington  
Causeway

Flat 25 Ceramic Building 87B Newington  
Causeway

Flat 15 Ceramic Building 87A Newington  
Causeway

Flat 7 Ceramic Building 87A Newington  
Causeway

Flat 6 Ceramic Building 87A Newington  
Causeway

Flat 2 Ceramic Building 87A Newington  
Causeway

Flat 26 Stephenson House Rockingham  
Estate Bath Terrace

261 Metro Central Heights 119  
Newington Causeway London

Flat 46 Smeaton Court Arch Street

Apartment 706 251 Southwark Bridge  
Road London

Unit 1 5-9 Rockingham Street London

10 Metro Central Heights 119 Newington  
Causeway London

231 Metro Central Heights 119  
Newington Causeway London

85 Metro Central Heights 119 Newington  
Causeway London

60 Metro Central Heights 119 Newington  
Causeway London

Flat 78 Stephenson House Rockingham  
Estate Bath Terrace

Apartment 1205 251 Southwark Bridge  
Road London

349 Metro Central Heights 119  
Newington Causeway London

Apartment 2504 251 Southwark Bridge  
Road London

Flat 12 Banks House Rockingham Estate  
Rockingham Street

Flat 68 Stephenson House Rockingham  
Estate Bath Terrace

Apartment 2006 251 Southwark Bridge  
Road London

Flat 10 Telford House Rockingham  
Estate Tiverton Street

Flat 14 Rankine House Rockingham  
Estate Bath Terrace

Flat 41 Telford House Rockingham  
Estate Tiverton Street

Apartment 3008 251 Southwark Bridge  
Road London

Flat 64 Stephenson House Rockingham  
Estate Bath Terrace

Flat 5 Stephenson House Rockingham  
Estate Bath Terrace

Flat 33 Stephenson House Rockingham  
Estate Bath Terrace

Apartment 1710 251 Southwark Bridge  
Road London

Apartment 1612 251 Southwark Bridge  
Road London

Apartment 1502 251 Southwark Bridge  
Road London

Apartment 1406 251 Southwark Bridge  
Road London

Apartment 1402 251 Southwark Bridge  
Road London

Apartment 3506 251 Southwark Bridge  
Road London

Apartment 2810 251 Southwark Bridge  
Road London

Apartment 2807 251 Southwark Bridge  
Road London

Apartment 3206 251 Southwark Bridge  
Road London

Apartment 3108 251 Southwark Bridge  
Road London

Apartment 1006 251 Southwark Bridge  
Road London

Flat 12 Rumford House Rockingham  
Estate Bath Terrace

Skipton House 80 London Road London

Apartment 2310 251 Southwark Bridge  
Road London

Flat 1 Stephenson House Rockingham  
Estate Bath Terrace

Flat 19 Smeaton Court Arch Street

Flat 5 Smeaton Court Arch Street

Flat 14 Smeaton Court Arch Street

77 Metro Central Heights 119 Newington  
Causeway London

Flat 4 Metro Central Heights 119  
Newington Causeway

Unit 1 Second Floor Lancaster House 70  
Newington Causeway

286 Metro Central Heights 119  
Newington Causeway London

268 Metro Central Heights 119  
Newington Causeway London

18 Metro Central Heights 119 Newington  
Causeway London

16 Metro Central Heights 119 Newington  
Causeway London

11 Metro Central Heights 119 Newington  
Causeway London

58 Metro Central Heights 119 Newington  
Causeway London

245 Metro Central Heights 119  
Newington Causeway London

116 Metro Central Heights 119  
Newington Causeway London

159 Metro Central Heights 119  
Newington Causeway London

Excluding Second Fourth And Sixth  
Floor Lancaster House 70 Newington  
Causeway

321 Metro Central Heights 119  
Newington Causeway London

Fifth Floor Lancaster House 70  
Newington Causeway

381 Metro Central Heights 119  
Newington Causeway London

372 Metro Central Heights 119  
Newington Causeway London

360 Metro Central Heights 119  
Newington Causeway London

Apartment 2010 251 Southwark Bridge  
Road London

Flat 34 Pioneer Building 91 Newington  
Causeway

Flat 50 Smeaton Court Arch Street

314 Metro Central Heights 119  
Newington Causeway London

297 Metro Central Heights 119  
Newington Causeway London

295 Metro Central Heights 119  
Newington Causeway London

108 Metro Central Heights 119  
Newington Causeway London

65 Metro Central Heights 119 Newington  
Causeway London

29 Metro Central Heights 119 Newington  
Causeway London

24 Metro Central Heights 119 Newington  
Causeway London

258 Metro Central Heights 119  
Newington Causeway London

Flat 8A Telford House Rockingham  
Estate Tiverton Street

229 Metro Central Heights 119  
Newington Causeway London

218 Metro Central Heights 119  
Newington Causeway London

204 Metro Central Heights 119  
Newington Causeway London

198 Metro Central Heights 119  
Newington Causeway London

187 Metro Central Heights 119  
Newington Causeway London

181 Metro Central Heights 119  
Newington Causeway London

323 Metro Central Heights 119  
Newington Causeway London

398 Metro Central Heights 119  
Newington Causeway London

403 Metro Central Heights 119  
Newington Causeway London

377 Metro Central Heights 119  
Newington Causeway London

374 Metro Central Heights 119  
Newington Causeway London

354 Metro Central Heights 119  
Newington Causeway London

82 Metro Central Heights 119 Newington  
Causeway London

Flat 2 Wellesley Court 15 Rockingham  
Street

Unit 3 Railway Arch 101 Rockingham  
Street

Flat 42 Smeaton Court Arch Street

Flat 28 Smeaton Court Arch Street

Flat 16 Smeaton Court Arch Street

390 Metro Central Heights 119  
Newington Causeway London

155 Metro Central Heights 119  
Newington Causeway London

139 Metro Central Heights 119  
Newington Causeway London

122 Metro Central Heights 119  
Newington Causeway London

110 Metro Central Heights 119  
Newington Causeway London

386 Metro Central Heights 119  
Newington Causeway London

59 Metro Central Heights 119 Newington  
Causeway London

52 Metro Central Heights 119 Newington  
Causeway London

351 Metro Central Heights 119  
Newington Causeway London

375 Metro Central Heights 119  
Newington Causeway London

357 Metro Central Heights 119  
Newington Causeway London

**Re-consultation:**

## Appendix 5: Consultation responses received

### Internal services

Flood Risk Management & Urban Drainage

Archaeology

Community Infrastructure Levy Team

Design and Conservation Team [Formal]

Local Economy

Ecology

Environmental Protection

Highways Development and Management

Highways Licensing

Transport Policy

Urban Forester

Waste Management

Community Infrastructure Levy Team

Design and Conservation Team [Formal]

Local Economy

Ecology

Environmental Protection

Highways Development and Management

Flood Risk Management & Urban Drainage

Transport Policy

Urban Forester

Waste Management

Design and Conservation Team [Formal]

Transport Policy

## **Statutory and non-statutory organisations**

Environment Agency

Great London Authority

Historic England

London Fire & Emergency Planning Authori

London Underground

Natural England - London & South East Re

Network Rail

Metropolitan Police Service (Designing O

Thames Water

Environment Agency

London Fire & Emergency Planning Authori

Metropolitan Police Service (Designing O

Metropolitan Police Service (Designing O

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

61 Metro Central Heights 119 Newington Causeway London

88 Metro Central Heights 119 Newington Causeway London

444 Metro Central Heights 119 Newington Causeway London

329 Metro Central Heights 119 Newington Causeway London

12 Metro Central Heights 119 Newington Causeway London

411 Metro Central Heights 119 Newington Causeway London

Apt 323 Metro Central Heights 119 Newington Causeway London

Apt 127 Metro Central Heights 119 Newington Causeway London

134 Metro Central Heights London SE1 6BB

Flat 17 Stephenson House Bath Terrace London



Apartment 61 Metro Central heights London

119 Newington Causeway Flat 54 metro central heights London

Flat 3 7 Angel Lane London

Flat 72, Metro Central Heights London SE1 6BA

flat 99 Metro Central Heights London se16bb

Stephenson House, 28 Bath Terrace London SE1 6PP

65 Metro Central Heights 119 Newington Causeway London

411 Metro Central Heights 119 Newington Causeway London

Apartment 90, Metro Central Heights 119 Newington Causeway London

48 Castle Road, Southsea PORTSMOUTH PO5 3AZ

**OPEN**

**MUNICIPAL YEAR 2022-23**

**COMMITTEE:**

**PLANNING COMMITTEE**

**NOTE:**

Original held in Constitutional Team; all amendments/queries to Gregory Weaver or Gerald Gohler, Constitutional Team, Tel: 020 7525 3667 / 020 7525 7420

**OPEN**

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