

Planning Committee (Major Applications)

B

Wednesday 5 March 2025

6.30 pm

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

Membership

Councillor Richard Livingstone (Chair)
Councillor Kath Whittam (Vice-Chair)
Councillor Ketzia Harper
Councillor Jon Hartley
Councillor Cleo Soanes
Councillor Michael Situ
Councillor Emily Tester

Reserves

Councillor Sam Dalton
Councillor Gavin Edwards
Councillor Nick Johnson
Councillor Richard Leeming
Councillor Darren Merrill
Councillor Reginald Popoola
Councillor Martin Seaton

INFORMATION FOR MEMBERS OF THE PUBLIC

Access to information

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

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Access

The council is committed to making its meetings accessible. For details on building access, translation, provision of signers or any other requirements for this meeting, please contact the person below.

Contact

Gregory Weaver on 020 7525 3667 or email: greg.weaver@southwark.gov.uk

Members of the committee are summoned to attend this meeting

Althea Loderick

Chief Executive

Date: 25 February 2025



Planning Committee (Major Applications) B

Wednesday 5 March 2025

6.30 pm

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

Order of Business

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PART A - OPEN BUSINESS

1. APOLOGIES

To receive any apologies for absence.

2. CONFIRMATION OF VOTING MEMBERS

A representative of each political group will confirm the voting members of the committee.

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

In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.

5. MINUTES

1 - 5

To approve as a correct record the minutes of the meeting held on 5 February 2025

6. TO RELEASE £411,177.86 FROM SECTION 106 AGREEMENTS FOR THE DELIVERY OF DRUID STREET IMPROVEMENTS

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7. DEVELOPMENT MANAGEMENT		95 - 99
7.1 24/AP/2770 SOUTHWARK UNDERGROUND STATION, THE CUT, LONDON SOUTHWARK SE1 8JZ		100 - 247

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.”

PART B - CLOSED BUSINESS

DISTRIBUTION LIST

Date: 25 February 2025

Planning Committee (Major Applications)

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 (major applications) 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 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
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Planning Committee (Major Applications) B

MINUTES of the OPEN section of the Planning Committee (Major Applications) B held on Wednesday 5 February 2025 at 6.30 pm at Ground Floor Meeting Room G01A - 160 Tooley Street, London SE1 2QH

PRESENT: Councillor Richard Livingstone (Chair)
Councillor Kath Whittam
Councillor Cleo Soanes
Councillor Michael Situ

OFFICER SUPPORT: Colin Wilson, (Head of Strategic Development)
Dipesh Patel, (Group Manager - Major Applications and New Homes Team)
Michael Feeney, (Specialist Planning Lawyer)
Richard Earis, (Principal Environmental Protection Officer)
Gemma Usher, (Team Leader)
Matt Harris, (Team Leader, Design Conservation and Transport)
Gregory Weaver, (Constitutional Officer)

1. APOLOGIES

Apologies were received from Councillor Ketzia Harper and Emily Tester.

2. CONFIRMATION OF VOTING MEMBERS

All members listed as present above were confirmed as the voting members for the meeting.

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

The chair drew member's attention to the members' pack and supplemental report which had been circulated before the meeting.

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

Councillor Whittam noted that Item 6.1 was in her ward but that she was attending with an independent clear mind.

5. MINUTES

RESOLVED:

That the minutes for the Planning Committee (Major Applications) B meeting held on the 10 December 2024 be approved as a correct record and signed by the chair.

6. DEVELOPMENT MANAGEMENT

RESOLVED:

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

6.1 24/AP/1880, SURREY QUAYS SHOPPING CENTRE

Planning Application Number: 24/AP/1880

Report: See pages 6-58 of the main agenda and pages 6-7 of the addendum.

PROPOSAL:

Change of use of existing retail unit to a cultural venue for a period of five years including:

- *Ground floor to include a food hall/leisure space and flexible events space, indoor farm, external terrace fronting the dock edge, back of house spaces, education and screening room*
- *First floor to include a covered external terrace fronting the boardwalk and separate room for other events or private hire, a new lift would be provided*
- *Roof to include associated plant*
- *Associated works comprise recladding of the facades with additional fenestration and access points, erection of external lighting and awnings, external alterations, landscaping and cycle parking on the southern dock edge.*
- *The proposed operating hours would be 06:00-01:00 Monday to Wednesday and 06:00-03:00 Thursday to Saturday and 08:00-23:00*

Sunday.

- *Total internal venue area is 4,901 sqm and total maximum capacity would be 2,000.*

The committee heard the officer's introduction to the report and addendum report.

Members put questions to the officers.

There were no objectors present.

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

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

There were no Ward Councillors present.

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

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

RESOLVED:

1. That temporary planning permission be granted for five years subject to the recommended conditions and informatics.

6.2 24/AP/2585, 98-104 RODNEY ROAD SE17

Planning Application Number: 24/AP/2585

Report: See pages 59-145 of the main agenda and pages 7-9 of the addendum.

PROPOSAL:

Variation of conditions 1 (Approved plans) and 26 (Number of Bedrooms) of permission ref. 20/AP/2953 dated 14/06/2024 for 'Redevelopment of 98-104 Rodney Road for a 9 storey (plus basement) building for hotel rooms (Class C1), café, community use, retail use and associated cycle/disabled parking, plant and landscaping'. The proposed amendments include: changes to the internal layout to revise the hotel bedrooms, substituting a portion of en-suite double bedrooms with shared pod-style rooms with shared bathrooms; incorporation of a second escape stair, evacuation lift and firefighting lift; introduction of communal space at 8th floor for guest use; revised basement layout; revised façade materiality; removal of the lower level basement; revised cycle and refuse storage and substation at ground level and associated elevational changes and changes to servicing arrangements;

revised first floor layout of community use and hotel rooms with a reduction of community use area; revised rood plant layout.

The committee heard the officer's introduction to the report and addendum report.

Members put questions to the officers.

Representatives of the objectors addressed the committee and responded to questions put by members of the committee.

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

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

There were no Ward Councillors in attendance.

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

Members asked for the following to be included:

- A condition for stays to be limited to no more than 30 days
- A clause in the s106 agreement for details of women only floors to be provided for agreement.

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

RESOLVED:

1. That planning permission be granted subject to revised conditions to those on the June 2024 permission, and the completion of a deed of variation to the original section 106 legal agreement; and
2. In the event that the requirements of paragraph 1 above are not met by 4 May 2025, the Director of Planning and Growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 172 of this report.

Meeting ended at 8.50 pm

CHAIR:

DATED:

Agenda Item 6.

Meeting Name:	Planning Committee: Major Projects B
Date:	5 March 2025
Report title:	To release £411,177.86 from Section 106 agreements for the delivery of Druid Street Improvements.
Ward(s) or groups affected:	London Bridge & West Bermondsey
Classification:	Open
Reason for lateness (if applicable):	N/A
From:	Highways

RECOMMENDATION(S)

1. That the Planning Committee (Major Applications) B approves the release of the funds amounting to **£411,177.86**, which were received by the council (pursuant to the terms of the legal agreements pertaining to the planning applications noted in Table 1, below) and are to be applied towards the Druid Street public realm and highway works improvements scheme (the “Scheme”).

Table 1 - Summary of Requested Funding.

Planning application Reference	Profit Centre	Spend Category	Address	Indexation amount	Amount
14/AP/0830	W07425	Transport - Strategic	237 Walworth Road London SE17 1RL		£105,780.96
18/AP/0900	W09065	Transport - Strategic	Capital House 42-46 Weston Street SE1 3QD	£5,564.32	£293,564.32
12/AP/2859	W09595	Public Realm Improvements	VALENTINE & ORSON PUBLIC HOUSE 171 LONG LANE, LONDON, SE1 4PN	£0.00	£14,832.92
Total					£411,177.86

BACKGROUND INFORMATION

2. Planning obligations are the legal obligations secured for the purposes of mitigating the impacts of a development proposal and can contribute to providing the infrastructure and facilities necessary to achieve sustainable communities. These obligations are secured in legal agreements (often referred to as, section 106 agreements), which are entered into by parties with proprietorial interests in the development site to which they relate. This is to ensure that they bind the owners of the site including the developers (should they have or subsequently acquire such interests). Moreover, planning obligations can take the form of a variety of different things including the requirement to pay (to the council) financial contributions.
3. In addition, the Community Infrastructure Levy (CIL) regime allows local planning authorities, like the council, the ability to levy a charge for new developments (above a certain size and type). The purpose of which is to raise funds to contribute towards the infrastructure needed to support the development of the area.
4. The council's S106 and CIL Supplementary Planning Document (SPD) 2015 (updated November 2020) provides detailed guidance on the council's use of planning obligations and CIL. And on the 6 March 2024, the Cabinet resolved that the new Section 106 (S106) and Community Infrastructure Levy (CIL) Supplementary Planning Document (SPD) be approved for consultation. This consultation concluded on 27 November 2024.
5. The Scheme is comprised of the following measures:

Road	Measure
Druid Street	Parking and waiting restrictions (double yellow lines and no loading blips) Changes to the loading restrictions Contra-flow segregated cycle lane Relocation of cycle hangar Raised tables Varying widths of footway/carriageway New footway Existing footway /carriageway resurfacing Drainage works Amended kerblines and new road layout (markings) Installation of street furniture (bollards & cycle stands) New trees and planting beds
Sweeney Crescent	Loading bay Parking and waiting restrictions (double yellow lines and no loading blips) Amended kerblines and new road layout (markings) Varying widths of footway/carriageway Drainage works Raised table

Gedling Place	<p>Varying widths of footway/carrigeway</p> <p>Amended kerblines and new road layout (markings)</p> <p>Parking and waiting restrictions (double yellow lines and no loading blips)</p> <p>Changes to the loading restrictions</p> <p>Footway/carrigeway resurfacing</p> <p>Drainage works</p> <p>Raised table</p> <p>Removal of traffic calming (speed humps)</p>
Stanworth Street	<p>Parking and waiting restrictions (double yellow lines and no loading blips)</p> <p>Amended kerblines and new road layout (markings)</p> <p>Varying widths of footway/carrigeway</p> <p>Footway/carrigeway resurfacing</p> <p>Drainage works</p> <p>Raised table</p> <p>Closure to motorised traffic at junction with Gedling Place</p>

6. And should the committee resolve to approve the recommendation (as set out in paragraph 1 above) these sums shall be released to the portfolio holder of the Department of Environment, Neighbourhoods and Growth, to be applied towards the implementation of the Scheme.
7. The Scheme aligns with Southwark's strategic transport objectives as set out in the Streets for People ("SfP") strategy (see paragraphs 25 – 28 for a detailed policy framework). Responses from the recent SfP engagement work in West Bermondsey, London Bridge, and South Bermondsey wards have contributed to the development of the outline design.

CONSULTATION

8. Discussions took place between residents and business groups who are keen to invest in the 'Low Line' project (which is the urban regeneration initiative for the establishment of the walking route along the historic railway viaducts in the Bankside, London Bridge and Bermondsey neighbourhoods). As Druid Street forms a part of this route, the supporters of the project would like to see improvements to the public realm to encourage walking along this route. Officers have been involved in discussions between Ward Councillors, business occupiers and owners, the licensing team and key stakeholders on Druid Street to establish the type of public realm improvements.
9. A temporary scheme consisting of a bi-directional segregated cycle track on Druid Street and a modal filter on Gedling Place to prevent access for motor vehicle traffic was designed and then consulted between September and October 2021 via an online survey.

10. Following analysis of the consultation responses, the changes were implemented on a trial basis under an Experimental Traffic Management Order in May 2022.
11. A further consultation was held between October and December 2022, which supported making the Experimental Traffic Orders on Druid Street and Gedling Place into permanent Orders. The consultation found that despite overall support, residents and businesses had reservations. Respondents to the consultation wanted more space outside the arches for businesses and visitors, more planting, safer crossings, improved levels and wider pavements to support older and disabled people.
12. In a decision made by the Cabinet Member for Leisure, Parks, Streets and Clean Air (on 7 March 2023), officers were instructed to proceed with a detailed design to improve the temporary scheme, addressing the issues raised regarding the consultation feedback and the Stage 3 Road Safety Audit.
13. Throughout the design stage, it became evident that the changes required on Druid Street and Gedling Place would need to be consulted again so they would be included in the consultation for the entire route from Tanner Street to Willow Walk.
14. Engagement took place between late 2023 and 2024, and surveys and investigations were carried out to develop a final outline design for the whole route. Consultation for the outline design of the route occurred between September and October 2024.
15. For the public consultation, 5,714 flyers were sent to the addresses of businesses and residents in the area. Two drop-in sessions were arranged on 17 September and 10 October 2024. A total of 280 online responses were received. Of those who responded, 73% were local (from Bermondsey).
16. The responses to the proposal on Druid Street received majority support (54.6%), or support but with some concerns to be addressed (13.2%). A full analysis of the consultation results can be found in Appendix 1.
17. The London Bridge & West Bermondsey ward councillors have been consulted and support both the Scheme to provide a new footway and improve the public realm and the overall project for the establishment of the new cycle route between Tanner Street and Willow Walk, which the Scheme forms part of.

KEY ISSUES FOR CONSIDERATION

18. As set out (in paragraph 1) above, the council is in receipt of funds amounting to £411,177.86 (“Financial Contributions”), which were paid to the council pursuant to the terms of the legal agreements entered into in relation to the developments noted above (in Table 1).

19. In 2017, a TfL Strategic Cycling Analysis was conducted to identify the future demand for cycling in Southwark. This analysis identified a need to connect north to south between the existing Cycleway 10 and Cycleway 14 (previously known as Quietway 1 and Quietway 14). This increases the number of people living within 400m of a cycle route, which aligns with the targets in the Mayor of London's Transport strategy. There is also a desire to divert cyclists who wish to continue north from Cycleway 10 towards the City, away from the busier main roads, and to use Cycleway 14 instead.

20. The council's highways department investigated the best alignment to promote cycling between the existing well-used TfL routes (Cycleway 10 and Cycleway 14). The preferred route joins Cycleway 14 at Druid Street continues along Gedling Place, Neckinger, Spa Road, Bacon Grove, and rejoins Cycleway 10 on Willow Walk at Curtis Street.

21. In addition to the permanent cycle route works, the Scheme seeks to address existing road safety issues on Druid Street by providing a new footway outside the railway arches. The pedestrian environment will be improved with more crossings, resurfacing existing footways, and public realm enhancements such as greening and tree planting.

22. The overall project seeks to achieve the following objectives:

- Connect C10 to C14 with an improved, safer cycle route;
- Increase the number of people living within 400m of a cycle route, in line with the Mayor of London's Transport strategy;
- Improve road safety in accordance with Vision Zero objectives to reduce on-street collisions;
- Provide new, wider, decluttered footways to improve the walking experience; and
- Public realm improvements.

23. The recommendation set out above (in paragraph 1) is to release the Financial Contributions and which are to be applied towards the delivery of the Scheme and without this funding it would mean that the road safety concerns [on Druid Street] of pedestrians walking in the carriageway would not be addressed, and the council would not be fulfilling its ambitions to improve accessibility in line with its policy. And such a decision will also likely negatively impact the delivery of the wider project. As it would mean that the proposals on Druid Street would likely be scaled back to only include the cycleway improvements, but not the footway works, or the extensive public realm improvements works proposed that form part of the overall project.

Policy framework implications

24. The recommendations contained within this report are consistent with the pledges and objectives set out in the SfP strategy (approved by Cabinet in July 2023), which outlines the council's ongoing commitment to and ambition for healthier neighbourhoods, cleaner air, thriving town centres and safer roads. The relevant SfP pledges are:

- Your home will be within 200m of a safe and pleasant walking route;

- Your neighbourhood will have parking spaces for cycles, e-bikes, hire cars, electric vehicles and disabled parking; and
- Your street will have improvements to make it cleaner, greener and safer, chosen by you.

25. The relevant SfP policy objectives are:

- **Objective 1 – Reduce the need to own or use a car**

The proposed improvements reduce carriageway widths, ban vehicle movements, remove parking, and provide segregated cycle infrastructure to facilitate active travel. Better walking and cycling infrastructure will assist residents in making more journeys on foot or by bicycle instead of car.

- **Objective 2 – Create good quality space that is accessible to all people**

The proposed measures include accessibility improvements such as new and wider pedestrian footways, raised crossings, and redesigned junctions for better safety and pedestrian priority.

- **Objective 4 – improve safety and security for everyone using our streets.**

The proposals will create a safer street for cyclists and pedestrians by providing protected infrastructure and upgraded crossings to reduce conflict with traffic and the potential for a collision with a motor vehicle.

- **Objective 5 – Make walking, cycling and wheeling easier**

Implementing the Scheme, including new footways, wider footways, and resurfacing of existing footways, improved the cycling and walking environment.

- **Objective 6 – Make walking, cycling and wheeling easier for children and young people**

It is proposed that new informal dropped crossings and controlled crossings be upgraded and provided to make walking easier for vulnerable road users. Wider footways, buildouts and a new footway on Druid Street, as well as the removal of traffic on Gedling Place, will make a traffic-free environment to make a healthier street.

- **Objective 7 – Work with rail operators, TfL and other transport operators to make public transport safe, accessible, and reliable**

We are working with TfL to amend the kerb lines at the junction of Druid Street and Tanner Street. The improvements are part of a wider grid of cycle routes that will improve residents' connectivity.

- **Objective 8 – Increase footfall and dwelling time in town centres by**

making them a nice place to be and easy to get to

Druid Street is recognised as a trip attraction for both residents within the borough and visitors from outside the borough. We are enabling small businesses by facilitating operational requirements and providing a new footway outside the arches to increase footfall and dwelling time.

- **Objective 11 – Reduce emissions from transport and improve air quality**

Providing a better walking and cycling experience will reduce car reliance, and more journeys by bicycle or on foot will reduce emissions from transport and improve air quality.

- **Objective 12 – Make streets greener and more resilient to extreme weather**

Green and blue infrastructure is proposed on the eastern side of Druid Street for sustainable drainage, and more trees are proposed to increase canopy cover.

26. The cycle route is consistent with the actions contained in the council's Delivery Plan (a policy document that sets out an action plan based on the council's priorities and its commitments (until 2026) to the residents of the borough):

- Working with local communities to design safer, greener and healthier streets for walking and cycling, prioritising areas with high health inequalities and low car ownership first.
- Improving safety at junctions and crossings
- Deliver on our equal pavements pledge, working with older people, those with disabilities and limited mobility to make sure Southwark's streets are accessible for everyone.
- Ensuring older and younger people, women and our Black, Asian and minority ethnic communities all have a full say, so we design streets and public transport that work for everyone.
- Rolling out more segregated cycle lanes
- Work with the community to redesign lighting in locations that are a priority for Southwark residents.

27. The Scheme is consistent with the actions contained in the council's climate action plan. This is a strategy and action plan that the council has committed to in order to make Southwark carbon neutral by 2030. The relevant section sets out priority for active and sustainable travel, in particular:

Priority 2 – Active and Sustainable Travel – “Be a borough where walking and cycling becomes the default way to get around”.

Community impact statement

28. Implementing any transport project creates a range of community impacts. All transport schemes aim to improve the safety and security of vulnerable groups and support economic development by improving the overall transport system and access to it.

29. As set out above, the Scheme aligns with the objectives in the SfP strategy to provide a better environment for walking and cycling and a positive economic impact on small businesses under the arches on Druid Street.

30. If implemented, cycling and walking will be monitored and reviewed after implementation, and feedback will be considered to see if any further refinements are required to better suit the needs of the area.

31. It is acknowledged that there has been tension previously between the residents of the Arnold Estate, on the northern side of Druid Street, and the ‘beer mile’, the breweries and bars that operate under the arches. The proposed footway on the southern side and greening strip on the northern side of the street is an attempt to address this to provide a space on the opposite side of the street to the houses (see Appendix 1 for a drawing with details). The popularity of the ‘beer mile’ has caused road safety issues and provision of a new footway will address this.

32. This Scheme is focused on delivering highways improvements and licensing concerns are outside the scope. However, the council’s licensing team have been consulted on the Scheme and will continue to monitor the situation.

33. Additional work will be undertaken during the next design stage to review whether any further accessibility improvements can be made as part of this Scheme’s detailed design.

Equalities (including socio-economic) impact statement

34. The Public Sector Equality Duty (“PSED”) is set out in section 149 of the Equality Act 2010 (“2010 Act”), which requires the council, in the exercise of its functions, to have due regard to the need to:

- eliminate discrimination, harassment and victimisation;
- advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it;
- foster good relations between persons who share a relevant protected characteristic and those who do not share it.

35. The Equality Impact and Needs Assessment (the “EINA”) was carried out to fulfil the Council’s PSED to assess the proposed cycle route between Tanner Street and Willow Walk (and incorporating works to Druid Street too) impact on groups with protected characteristics. The full report is included in Appendix 3.

36. The EINA identified persons with protected characteristics who would be most affected by the measures are those with disabilities, the elderly (age), pregnancy and maternity, race, and sex. Although not a protected characteristic under the 2010 Act, the EINA identifies how social-economic factors can also negatively impact certain groups disproportionately. Therefore, the council takes into consideration in the EINA the way in which it could improve its services to mitigate the impact on those marginalised groups (identified in the assessments).

37. While the EINA identifies some minor negative impacts of the whole cycle route (from Tanner Street to Willow Walk), it did not identify any adverse equalities impacts for the proposals on Druid Street.

38. The overall project's design has also been developed in consultation with accessibility experts from Wheels for Wellbeing (a charity dedicated to improving accessibility for disabled persons), who joined council officers for a walkthrough of the route and held a workshop to provide advice to ensure the design was inclusive. The Wheels for Wellbeing assessment looked at street furniture, footway surfacing, upgrading crossing facilities, choosing materials, and specifying acceptable gradients. A full list of detailed mitigating actions can be found in the EINA in Appendix 3.

39. None of the proposals in the project are considered to have significant adverse effect on socio-economic or health equalities. However, officers will continue to monitor impacts once the cycle route has been implemented to determine whether additional mitigating actions are required.

40. On balance the EINA identifies that the cycle route as a whole will have more positive impacts than negative impacts on those with protected characteristics. Road space will be reallocated for safer cycling and walking, benefits for active travel, and improvements to road safety. As set out above, mitigations have been put in place to promote equality of opportunity and foster good relations between persons with and without protected characteristics.

Health impact statement

41. PSED, requires public bodies to consider all individuals when carrying out their day-to-day work – in shaping policy, in delivering services and in relation to their own employees. As mentioned above, it requires public bodies to have due regard to eliminating discrimination, advancing equality of opportunity, and fostering good relations between different people when carrying out their activities. The council's [Approach to Equality](#) commits the council to ensuring that equality is an integral part of the council's day to day business.

42. The Scheme is a product of extensive prior engagement through the SfP programme. In this borough-wide piece of work, Council Officers engaged with a total of 9,000 residents, including 244 residents based in London Bridge and West Bermondsey ward. The large-scale engagement assessed residents' transport uses and top concerns and interests. These responses were analysed and have contributed to the development of the Scheme.

43. This Scheme supports the council's mission to have zero people killed or

injured on our streets by 2041. Reducing conflict between cyclists, pedestrians, and vehicles will reduce road traffic accidents.

44. Better facilities for wheelchair users, mobility scooters, and adapted cycles will benefit the mobility impaired, whether they are using the footway improvements or the proposed cycle facility.
45. Safer cycling and walking routes encourage active travel and less reliance on motor vehicles and, therefore, have health benefits for those who choose to walk or cycle more as a result of the changes.
46. The equality and health analysis demonstrates that the policy shows no potential for discrimination, and all appropriate opportunities have been taken to advance equality of opportunity in access to transport for people with different protected characteristics.

Climate change implications

47. The measures support the aims of the council's Climate Change Strategy under Priority 2 – Active and Sustainable Travel. Key aims of the Council's Climate Change Strategy include 'reducing car journeys to a minimum by 2030' and 'being a borough where walking and cycling becomes the default way to get around'. Part of meeting the borough's ambition of net zero emissions by 2030 includes a reduction in vehicle kms travelled and a shift to active and public transport. Transport currently accounts for 20% of the borough's emissions, of which around 99% come from on-road transport.
48. The proposed scheme supports residents' positive modal shift away from private car ownership and towards active travel. Reallocating space away from private cars to create cycle lanes and wider footways will help reduce reliance on car journeys. This prioritisation of streets for use by pedestrians and cyclists aligns with the Climate Change Strategy objective.
49. A just and inclusive transition is at the heart of the council's emerging climate policy. These proposals prioritise the movement of people first and foremost while retaining access for those who require it. In delivering a safer and more equitable highway network, the measures to be delivered in this Scheme are in accordance with the Council's approach to addressing the climate emergency.
50. Tree planting and rain gardens are proposed as part of the improvements on Druid Street, and sustainable drainage will be proposed where possible.
51. A carbon cost budget has been set for the Scheme, and subsequent designs and construction plans will be planned to reduce carbon emissions during the project life cycle, including construction techniques and maintenance.

Resource implications

52. All staff resourcing implications will be contained within the existing Highways structure. Therefore, there will be no additional resource required in this regard

for the delivery of the Scheme.

Financial implications

- 53. The estimated cost for the delivery of the next stage of detailed design for Druid Street is £30k. There is currently £100k available from CIL funds which will fund detailed design but not construction, estimated to be £480k for Druid Street. The shortfall is being sought from S106 contributions.
- 54. The rest of the cycle route is funded by TfL [](LIP) funding, which has already been secured. However, the TfL LIP funding cannot be used for the public realm improvements, which are proposed in the Druid Street Scheme. Therefore, without the release of the Financial Contributions sought here the improvements on Druid Street will have a shortfall and need to be either omitted from the overall project or redesigned to reduce the scope. To do so may mean that the Scheme doesn't meet the objectives as set out in paragraph 23.
- 55. Once this report is approved, a new capital cost code will be created for "Druid Street improvements scheme" in ESL Department's capital programme, as per Highways Manager's request and budget needs to be added to that new cost code.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Planning and Growth

- 56. The Financial Contributions are currently unallocated and available to be released by the Planning Committee for their expenditure.
- 57. As mentioned above, the council already has a team to manage the delivery of this Scheme, so there will be no additional resource requirements from the council.

Strategic Director of Resources CAP24/093

- 59. This report seeks approval to release **£411,177.86** from the Section 106 agreements for the Druid Street cycling and walking improvements as outlined in this report.
- 60. The Strategic Director of Resources notes the resource implications in paragraphs 35 to 38 and the supplementary advice from the Assistant Chief Executive, Governance & Assurance and confirms that the Council has received the related funds and that they are available for the purposes outlined in this report.

BACKGROUND DOCUMENTS

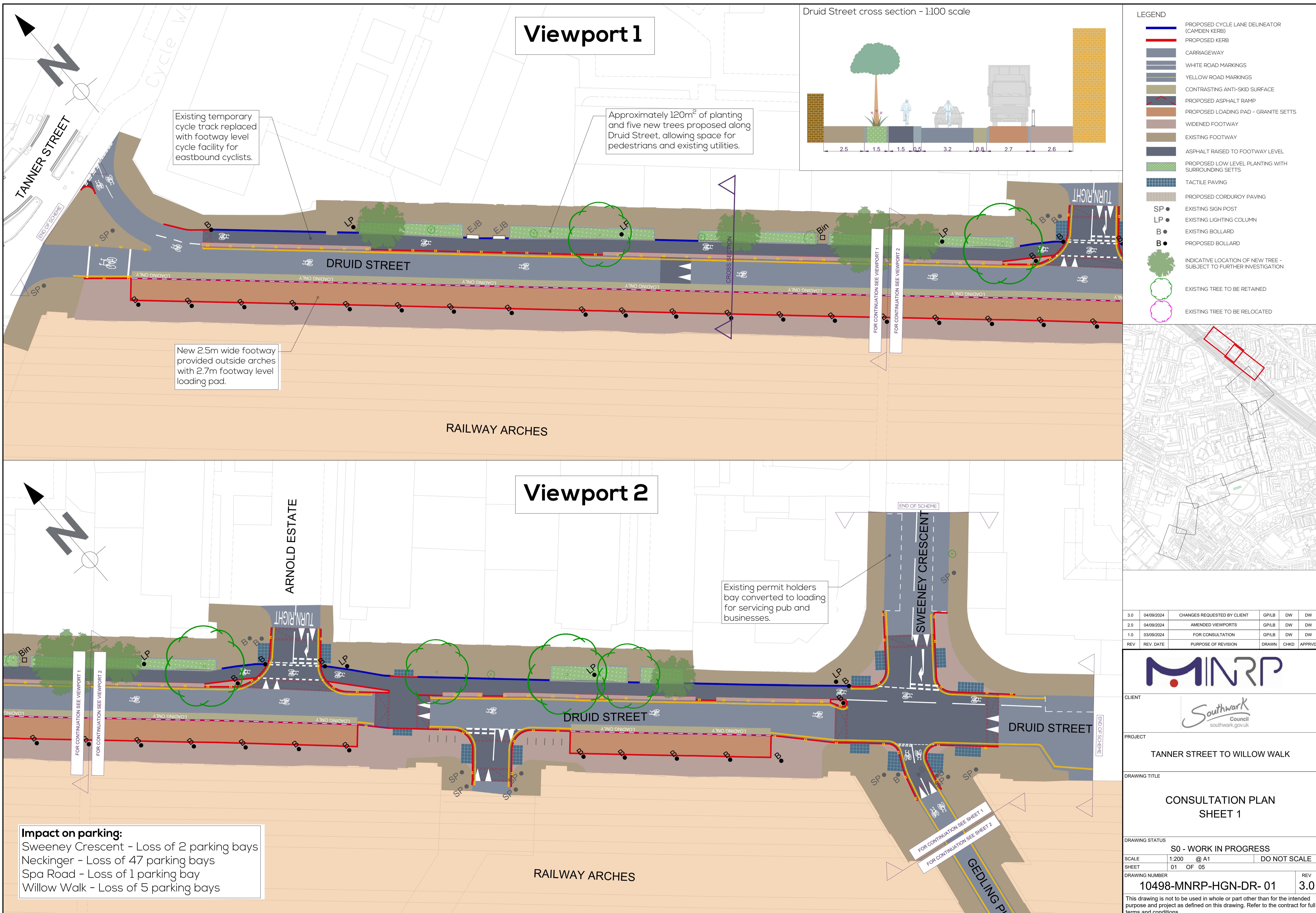
Background Papers	Held At	Contact
Copies of S106 All documents can be accessed online at: Link: https://www.southwark.gov.uk/planning-and-building-control/planning-applications/planning-register-search-view-and-comment-on-planning-applicationsapplications	Southwark Council 160 Tooley Street London SE1 2QH	Neil Loubser 020 7525 5451
Council Delivery Plan https://www.southwark.gov.uk/about-council/how-council-works/policies-plans-and-strategies/council-delivery-plan-and-annual	Southwark Council 160 Tooley Street London SE1 2QH	Tom Robison
Streets for People 2023 Streets for People Strategy - Southwark Council	Southwark Council 160 Tooley Street London SE1 2QH	Tom Robison
Climate Change Strategy Climate Change Strategy - Southwark Council	Southwark Council 160 Tooley Street London SE1 2QH	Tom Sharland 02075250959
Licensing Committee Minutes (09/03/2020) https://moderngov.southwark.gov.uk/documents/g6521/Printed%20minutes%20Monday%2009-Mar-2020%2019.00%20Licensing%20Committee.pdf?T=1	Southwark Council 160 Tooley Street London SE1 2QH	Craig Taylor

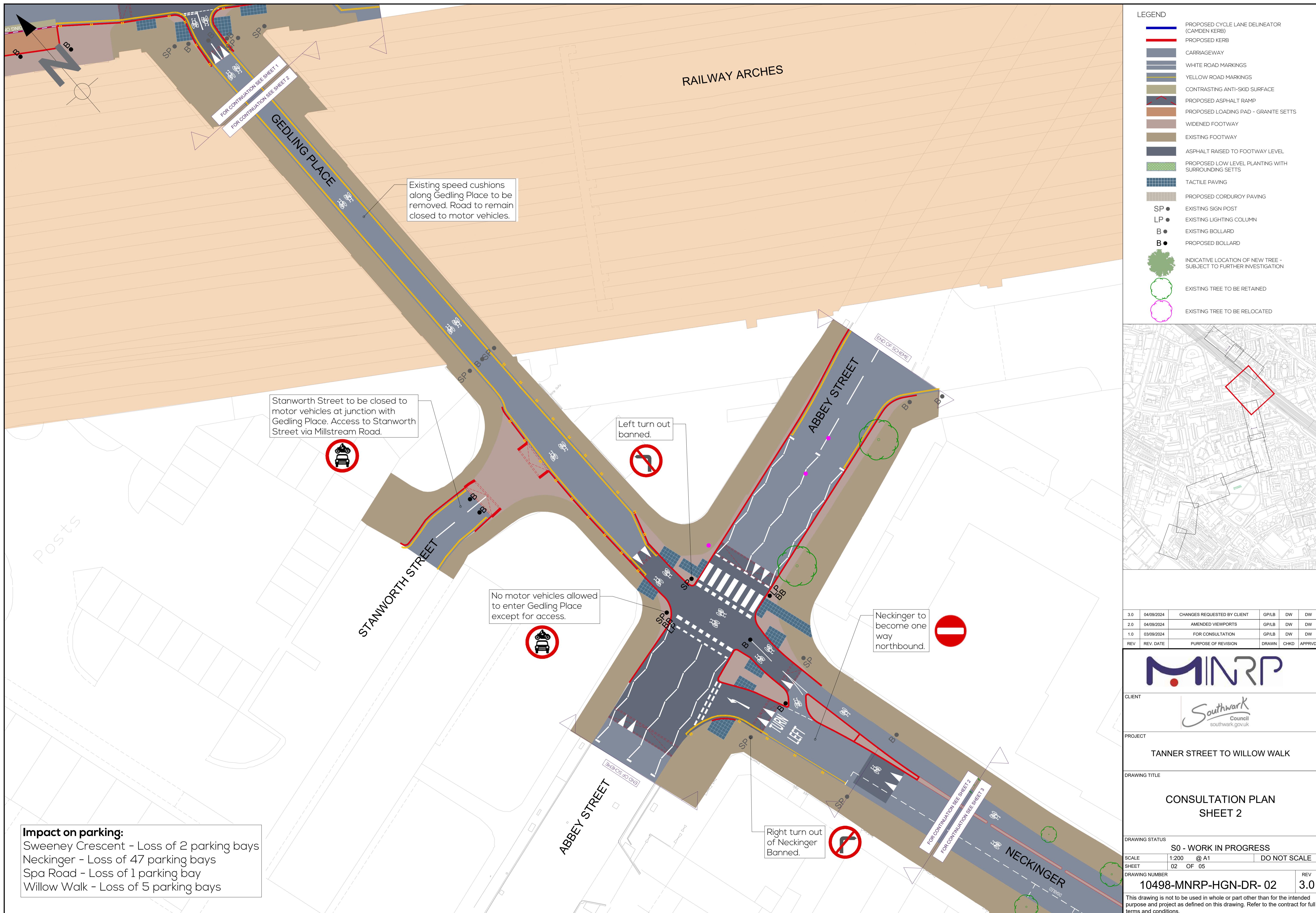
APPENDICES

No.	Title
Appendix 1	Outline Design Drawing
Appendix 2	Consultation Summary Report
Appendix 3	Equalities Impact and Needs Assessment

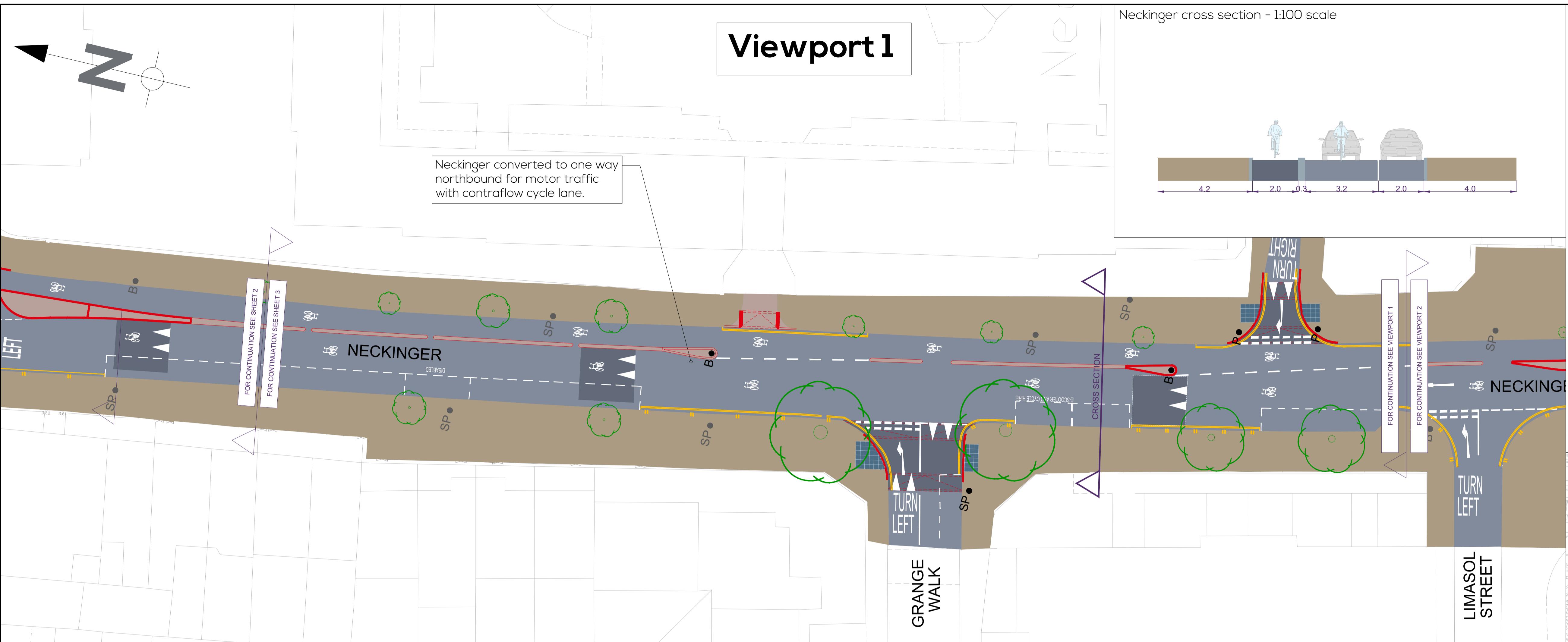
AUDIT TRAIL

Cabinet Member	Councilor McAsh – Cabinet Member for Clean Air, Streets and Waste	
Lead Officer	Coco Mak – Principal Project Manager, Highways	
Report Author	Josh Kerry – Project Manager, Highways	
Version	Final	
Dated	05/02/2025	
Key Decision?	Yes	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments Included
Assistant Chief Executive, Governance and Assurance	Yes	Yes
Strategic Director of Resources	Yes	Yes
Director of Planning and Growth	Yes	Yes
Cabinet Member	Yes	Yes
Date final report sent to Constitutional Team	24 February 2025	

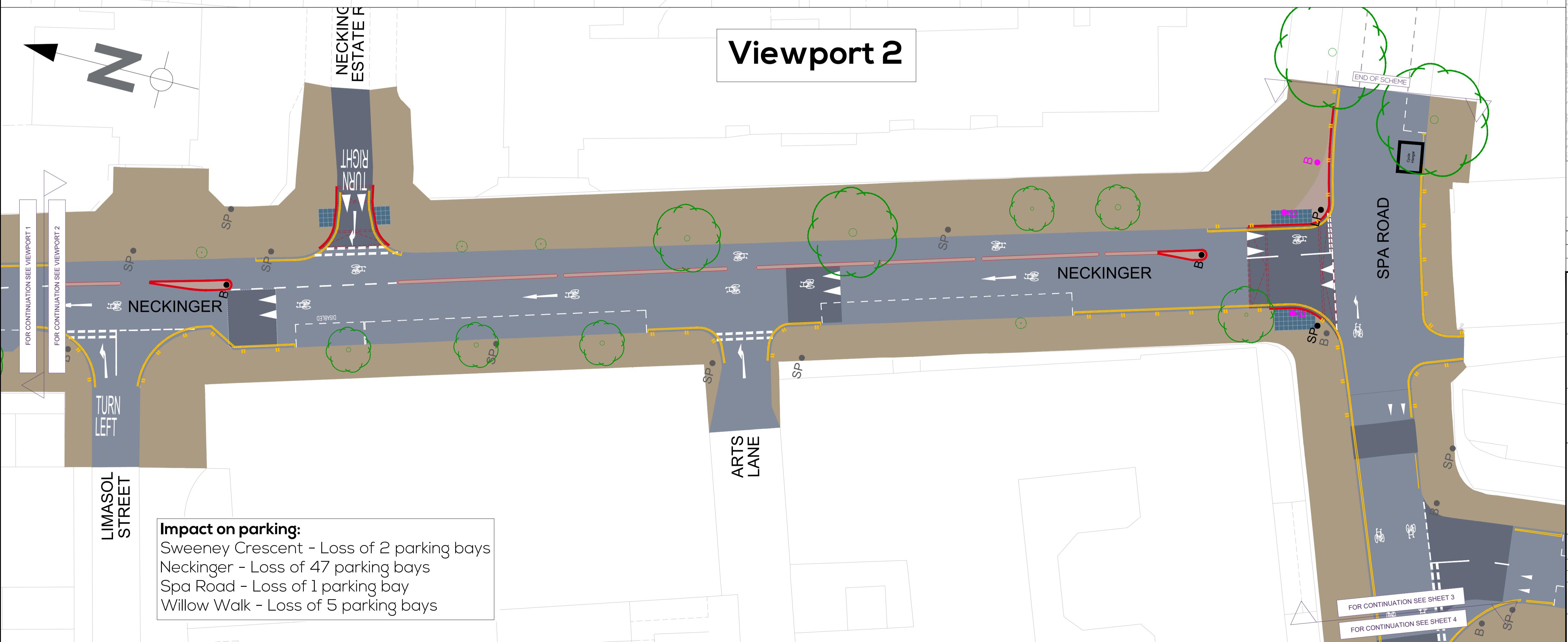


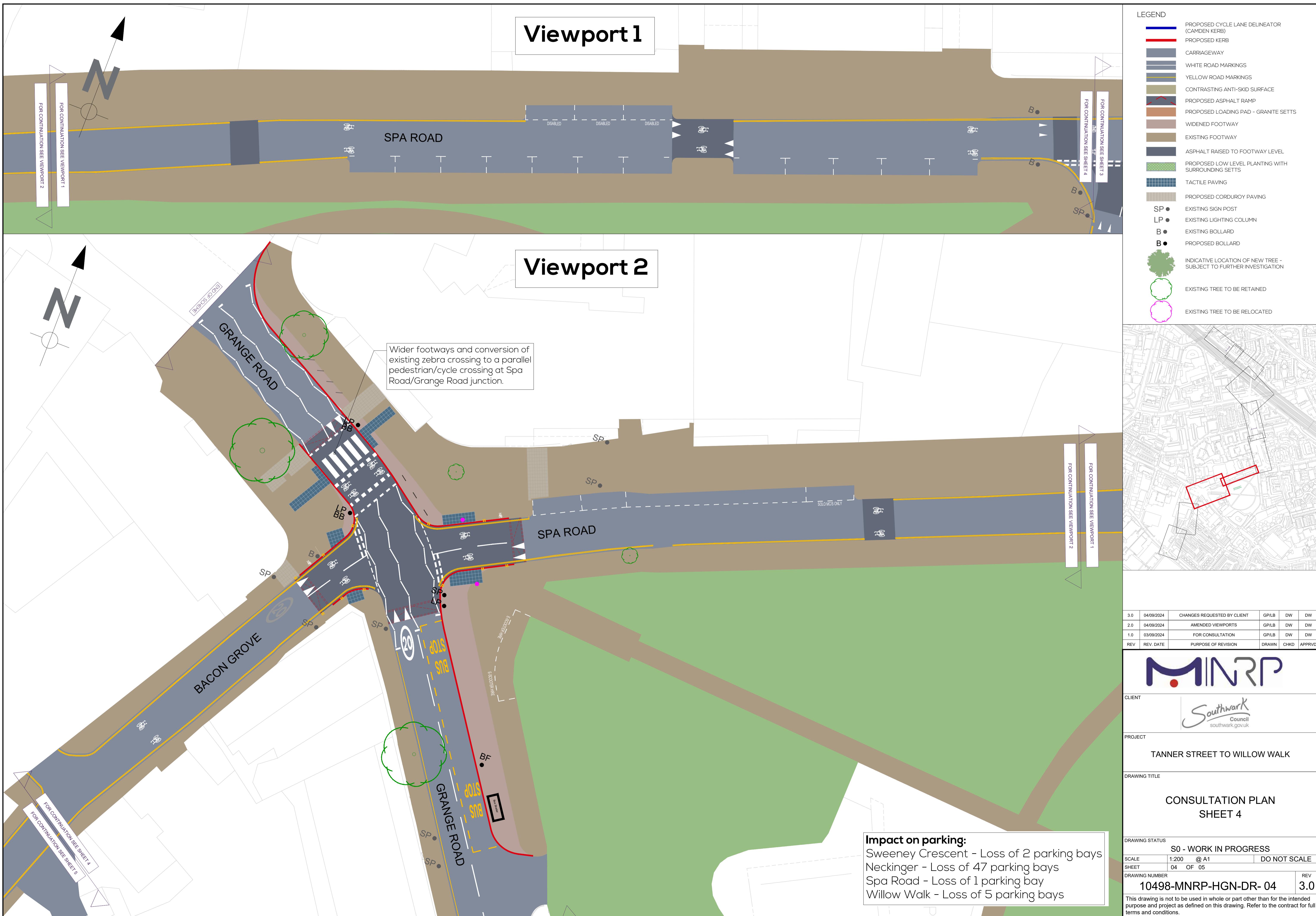


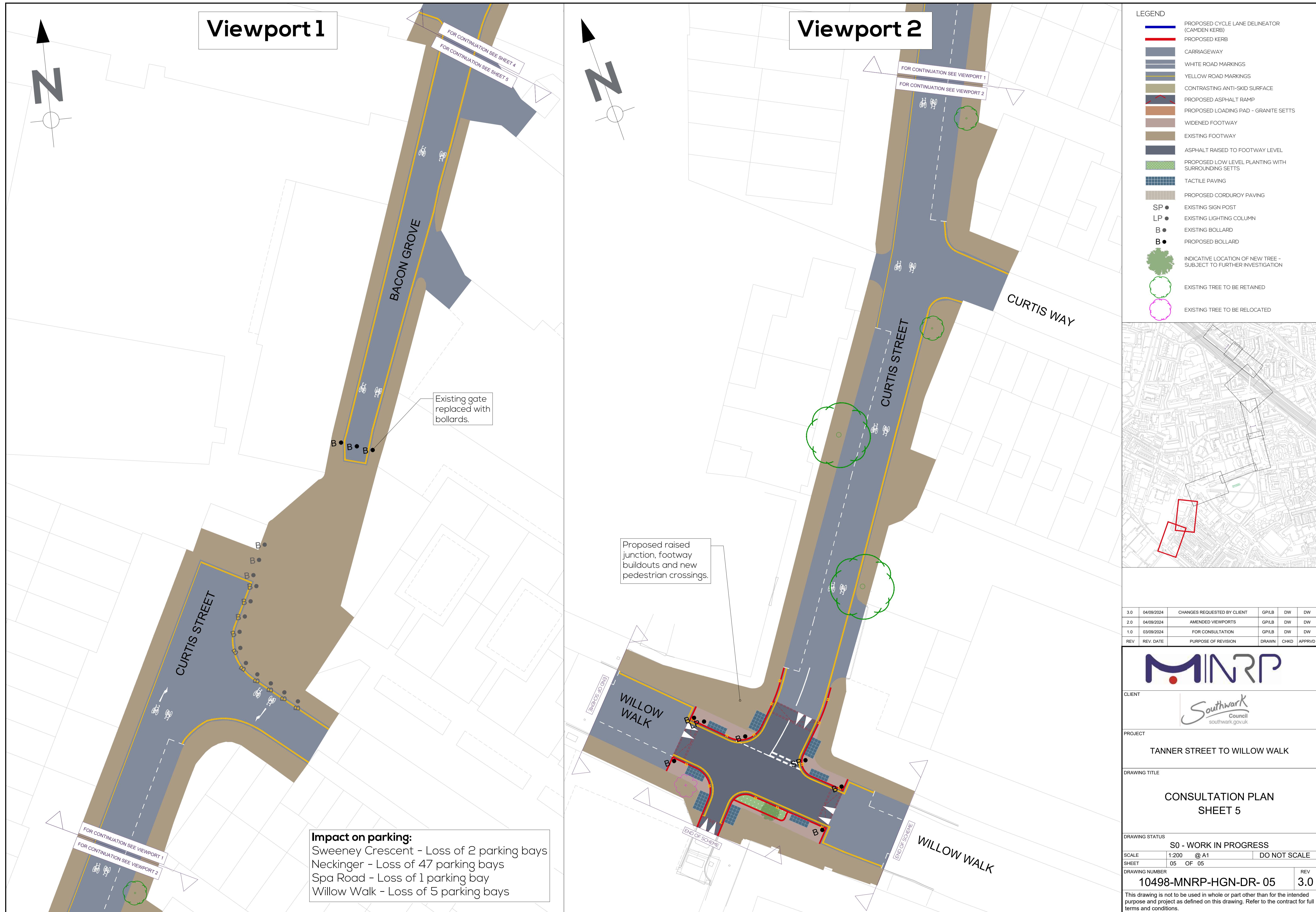
Viewport 1



Viewport 2







Tanner Street to Willow Walk

Cycle Route

Consultation Summary Report

October 2024



Introduction

This report has been produced by London Borough of Southwark Highways team to summarise the engagement activities and consultation results for a proposed cycle route between Tanner Street and Willow Walk.

The route includes proposed changes to Druid Street.

Druid Street had a temporary scheme installed in 2021 and this was to be reviewed as part of the installation of the wider cycle route.

The objectives of this scheme are to:

- (i) Promote sustainable travel and make it easier to choose sustainable ways to travel,
- (ii) Increase safety for cyclists, attract existing and new cyclists to the area,
- (iii) Improve accessibility and walking along the route,
- (iv) Address any road safety concerns in the area.

Therefore, Southwark Council investigated ways to improve healthiness of the streets so that more people can comfortably walk, cycle and spend time in the area. Data was collected, surveys undertaken, and site visits took place to observe existing road users and produce designs for highway improvements to meet the brief.

Previous work to date

In 2017 TfL carried out a Strategic Cycling Analysis to identify the future demand for cycling in Southwark. This analysis identified a need to provide a connection from north to south between Cycleway 10 and Cycleway 14 (previously known as Quietway 1 and Quietway 14). This increases the number of people living within 400m of a cycle route, in line with targets contained in the Mayor of London's Transport strategy. There is also a desire to divert cyclists that wish to continue north from Cycleway 10, towards the City, away from the busier main roads and to use Cycleway 14 instead.

Southwark Highways team produced a Route Development Plan between Cycleway 10 and Cycleway 14 to assess options and decided the preferred alignment was from Tanner Street along Druid Street, Gedling Place, Neckinger, Spa Road, Bacon Grove to join Cycleway 10 on Willow Walk at Curtis Street. This analysis took into account desire lines, baseline data, suitability of streets for active travel and constraints/scope for improvement.

Previous informal consultation for Druid Street was carried out between 17 September and 15 October 2021, via an online survey on the Consultation Hub, asking for feedback on the temporary proposals developed by Southwark Transport Projects Design Team.

Following analysis of the consultation responses, a recommendation was made to the Lead Cabinet Member to install the proposals for Druid Street and Gedling Place under an Experimental Traffic Management Order, implemented in May 2022, which comprised bi-directional segregated cycle lanes on Druid Street, and a modal filter on Gedling Place to prevent access for motor vehicle traffic.

A further consultation between October and December 2022 supported making Druid Street and Gedling Place Experimental Traffic Orders permanent. The consultation found that despite overall support, residents and businesses had reservations. Respondents to the consultation wanted more space outside the arches for businesses and their visitors, more planting, safer crossings, improved levels and wider pavements to support older and disabled people.

The recommendation from the Decision in February 2023 was to proceed with a detailed design to improve the temporary scheme; addressing the issues that have been raised regarding the temporary scheme feedback and the Stage 3 Road Safety Audit.

Discussions took place between residents and business groups, who are keen to invest in the Low Line walking route along the historic railway viaduct. Druid Street forms a part of this route, therefore the Low Line supporters would like to see public realm improvements to encourage walking along this route too. There is a commitment from developer S106 funding to deliver greening and public realm improvements. Officers have been involved in discussions between Ward Councillors, business occupiers and owners, LBS licensing team and stakeholders on Druid Street for the type of public realm improvements and established the requirement for a footway outside the arches.

It became evident throughout the design stage that the changes required on Druid Street would need to be consulted again and so would be included in the consultation for the entire cycle route.

Consultation

Phase 1: Early Engagement

The engagement varied for Druid Street versus the rest of the route. This was because Druid Street had already had a consultation for the temporary scheme (2021), followed by another consultation to make the experimental traffic orders permanent (2022). However it was recognised in the subsequent [Decision Report](#) (2023) that some amendments would need to be made in the permanent scheme and additional engagement with businesses was required to inform this.

Therefore, all affected businesses on Druid Street and Maltby Street were sent letters at the start of the design stage, November 2023, to inform them of the upcoming scheme and request appointments in person to discuss their operational needs and potential on-street improvements. Over the course of the next few months the project team met with and discussed proposals with all the affected Druid St businesses and carried out questionnaires to understand their requirements.

Below are the frequently mentioned themes from the engagement with businesses:

- Narrow carriageway width makes loading difficult/unsafe with adjacent live traffic lane
- Existing loading bays are too narrow
- Lack of space means sometimes carriageway gets blocked
- Existing cycle facility is perceived not to be well used. It was questioned whether it could be narrower or contraflow only
- Loading bay restrictions are not enforced and so often vehicles are often left for long periods
- Very high footfall and pedestrians now walk in the road particularly during the weekends
- More greening could be provided

Based on this information three scoping options were developed and more engagement took place in early January 2024 to present the options and gather feedback. Other Druid Street stakeholders were consulted and the preferred option was chosen to be developed into an outline design.

For the rest of route there was no temporary scheme and so no prior engagement had taken place. Once a initial scoping option was established, an early engagement phase occurred in July 2024 during which all properties fronting the route from Tanner Street to Willow Walk were hand delivered a letter to inform them of the proposals and invited to a drop-in session to provide feedback. The letter and summary of proposed interventions was delivered to all affected addresses in Gedling Place, Abbey Street, Neckinger, Spa Road, Grange Road, Bacon Grove and Curtis Street to make local residents and businesses aware of the scheme. A webpage was set up using the consultation hub and residents were invited to comment on a map of the route to raise issues and suggest improvements.

For residents that were unable to participate online alternative methods of contact were provided; such as email address, contact number and postal address.

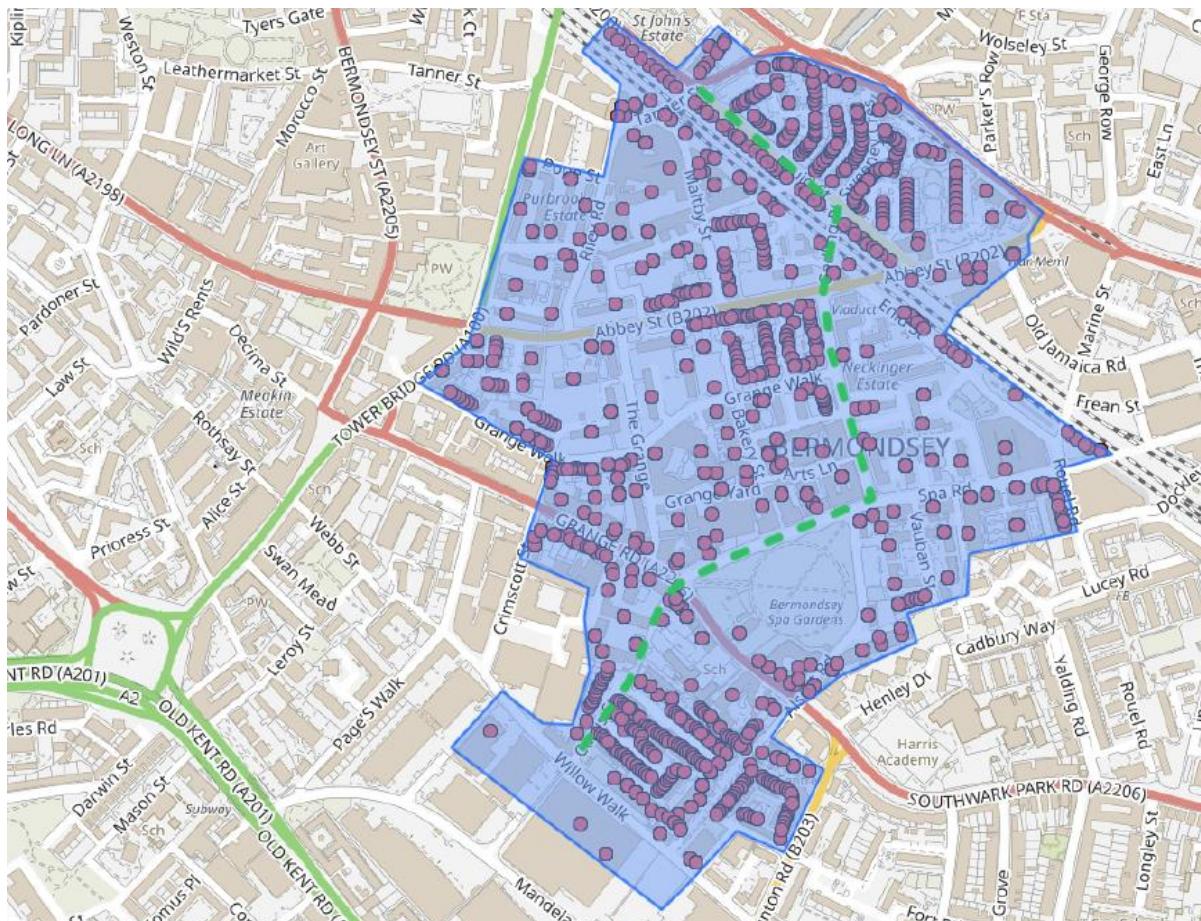
The phase 1 feedback was considered and designs amended before phase 2 of the engagement.

Phase 2: Consultation

Phase 2 was a public consultation exercise held between 06 September and 20 October 2024. Residents were invited to participate in an online survey to review the outline designs and show support or vote against the proposals, and provide individual feedback. The online consultation was publicised via postcard flyers that were circulated to 5174 addresses in the consultation zone shown in Appendices. On the postal flyers a QR code directed people to the online survey consultation webpage, or alternatively the url was displayed so they could visit the website to have their say.

There was also a freepost address to request paper copies of the survey if required.

All the flyers were delivered by Royal Mail 2nd class delivery. The catchment area for the flyer mailout to recipient addresses is shown in the map below:



There were three consultation events held over the course of the engagement. These were:

- 3pm – 5pm 17 July 2024: Kagyu Samye Dzong Buddhist Centre on Spa Road
- 3pm – 5pm 18 September 2024: Gazebo outside Spa Gardens
- 5pm – 7pm 10 October 2024: Gazebo on Druid Street

The latter was arranged as an additional event organised later in the consultation to bring it to the attention of those residents who had complained of not receiving the flyer in the initial mailout. It was arranged later in the day to allow people to attend after work.

The aim was to speak to residents that were going to be directly affected by the proposal, to raise awareness of the proposed changes and capture their opinions by speaking to them in person. Instead of the conventional drop-in type event – that is, waiting at a venue for interested residents to show up – instead project officers set up a gazebo and actively went out to undertake surveys of local people passing on the street.

This event increased response rate and provided an extra opportunity for anyone who wasn't previously aware of the consultation to visit the on-street gazebo and have opportunity to ask questions.

In addition to these events the project team reached out to all the local housing TRAs in the catchment area. All the TRAs were contacted and there were three meetings set up over the course of the engagement these being with Arnold Estate, Purbrook Estate and Neckinger Estate. We also contacted Setchell Estate TRA, who attended the meeting in Neckinger TRA hall.

There were also 30 posters erected on streetlighting columns in the catchment area, approximately 2 per street. The poster alerted passers-by to the consultation and directed them to fill out the online survey by way of QR code and website link. It also provided details for the drop-in consultation event and how to request a paper copy of the questionnaire as an alternative to responding online. The aim of the posters was to capture feedback from those who walk, cycle or travel through the area by bus or car, or who visit the area but did not necessarily live in the streets which received the postcards through the mail. It also served to increase awareness of those who lived in the streets and did get a flyer as a reminder to complete the survey or attend the events.

As well as posters and flyers additional efforts were made to engage local businesses and organisations. These places were visited in person during the consultation period to ensure that the proposed scheme was brought to their attention and they had their chance to submit feedback. The local schools and nurseries near to the route were all visited, as well as faith groups and youth groups, to discuss the proposals face to face and encourage them to publicise the survey to their members.

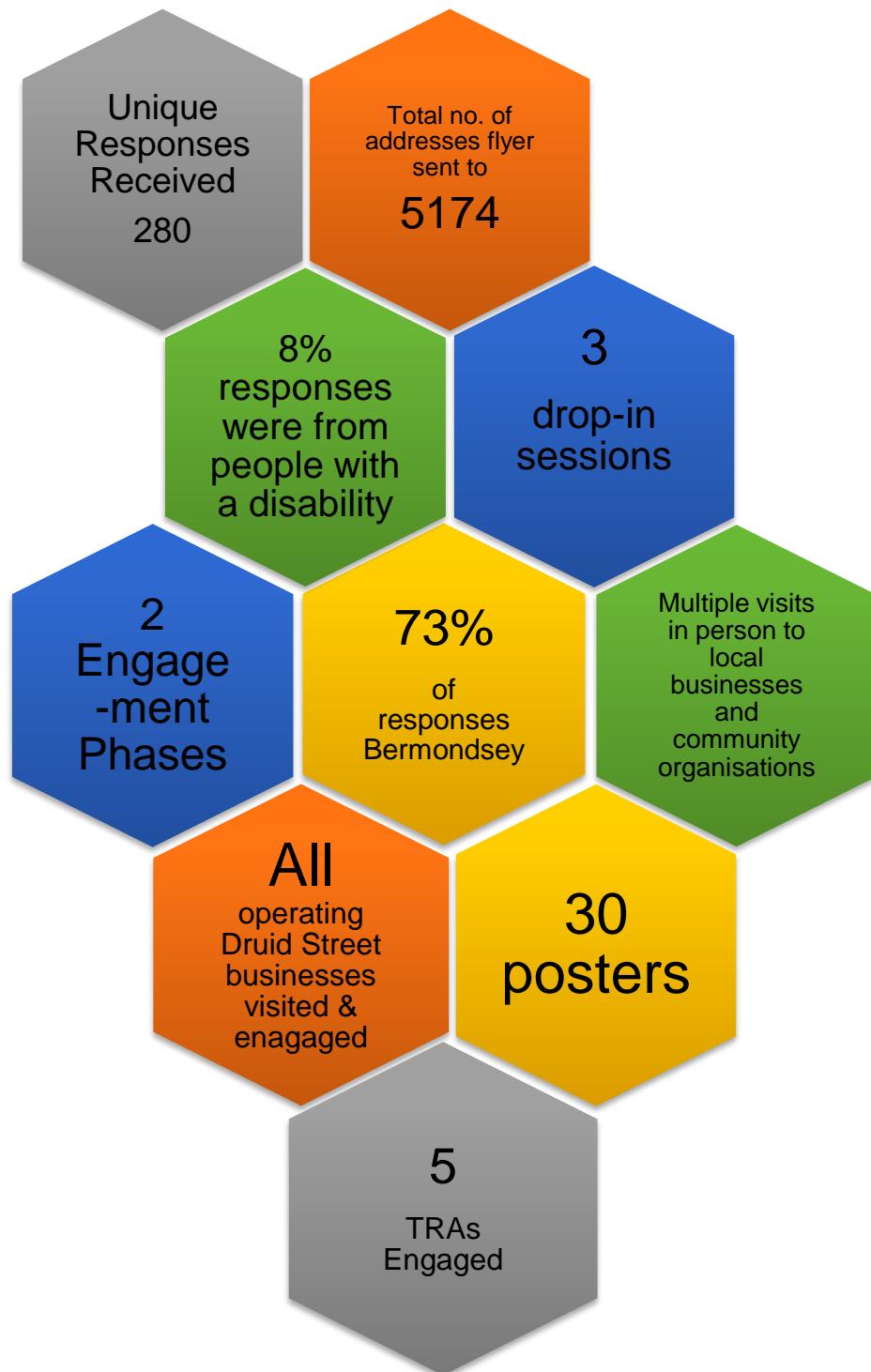
Community groups were emailed to give them a chance to have their say. Local faith groups in the nearby Bermondsey and London Bridge wards were emailed and then followed up with phone calls and visits occurred to reach out and gather their feedback. Meetings with stakeholders took place with those that expressed an interest to explain the scheme and invite comments.

A total of 280 responses were received during the consultation period, and 73% of these responses were from Bermondsey.

The consultation data has been analysed and common themes identified. These have been grouped to show the overall views of the respondents towards the scheme in general, as well as individual aspects of the scheme. This forms the core of the quantitative analysis.

The data has also been analysed to identify any differences in approach based on protected characteristics, which will inform the Equalities Impact and Needs Assessment.

Headline Consultation Numbers



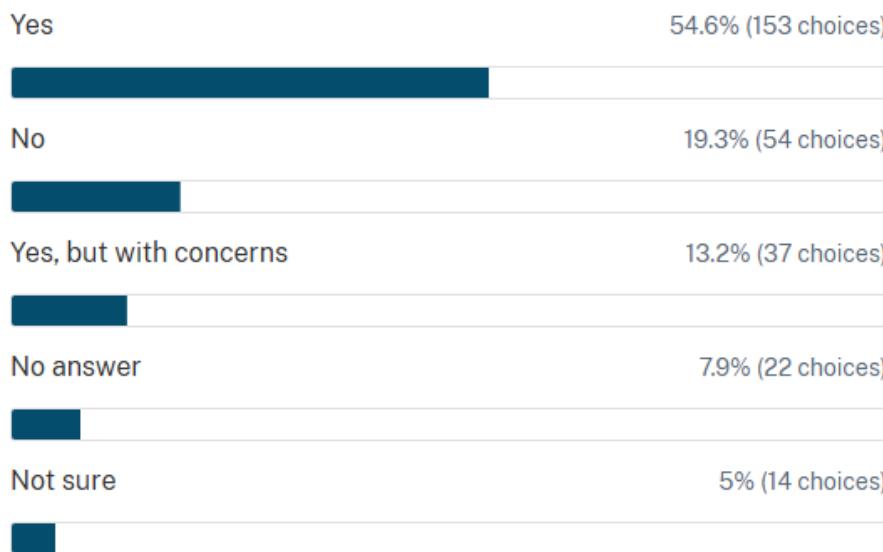
Detailed Consultation Responses

The consultation online survey requires a unique email address to complete the survey. The email address also needed to be validated via link to participate – this was to deter multiple entries from the same participant(s) so that results cannot be skewed.

The proposals for the cycle route were divided into sections, street by street, with a question on each to gather feedback for each of the planned measures. The results showed majority support for all proposed measures. They will be analysed in further detail below.

Do you support the changes to Druid Street for installation of a new pavement and permanent segregated contra-flow cycle lane?

There were 258 responses to this question. As you can see overall there is strong support:



There was also an opportunity for participants to provide additional comments about the Druid Street proposal in a free text box after the multiple choice poll.

The existing bi-directional cycle track received mixed views; some unhappy with its removal and others supportive of the change to facilitate the walking improvements on the other side of the street. Arguments for both sides came from cyclists and were not just split along the traditional divide of

cyclists versus motorists / anti-cyclist. There are specifics mentioned here around cycle protection which have been passed on to the design team to consider in the development of the detailed design, for example type of segregation and treatment at side roads. These will be addressed in the detailed design stage.

A recurring theme was the perceived heavy traffic volume using Druid street, and complaints of speeding. The traffic speed and volume were reported as problematic, especially reports of occasionally very heavy congestion when the road network gets congested elsewhere, i.e. Rotherhithe Tunnel or Tower Bridge closures. There is a realtime traffic counter on Druid Street and the baseline data has been used to inform the designs. This will be further analyses to investigate the traffic issues and also be used to monitor the success of the scheme.

Top Ten Themes:	Count (no. of responses)
Pedestrian Safety	16
Traffic volume	13
Against the removal of the bi-directional cycle track	11
Cyclists' Safety	10
Traffic Congestion	10
Other comment on segregated cycle lanes	10
Road safety	9
Loading	8
Anti-Social Behaviour of cyclists	7
Against investment for more cycle facilities	7

The removal of the bi-directional cycle lane was met with mixed reactions because of increased danger due to traffic congestion, whilst others questioned the prioritisation of cyclists over other road users. Concerns about cyclists adhering to traffic rules and the impact of anti-social behaviour of cyclists on pedestrian safety were also frequently mentioned and this was a recurring theme on all survey questions.

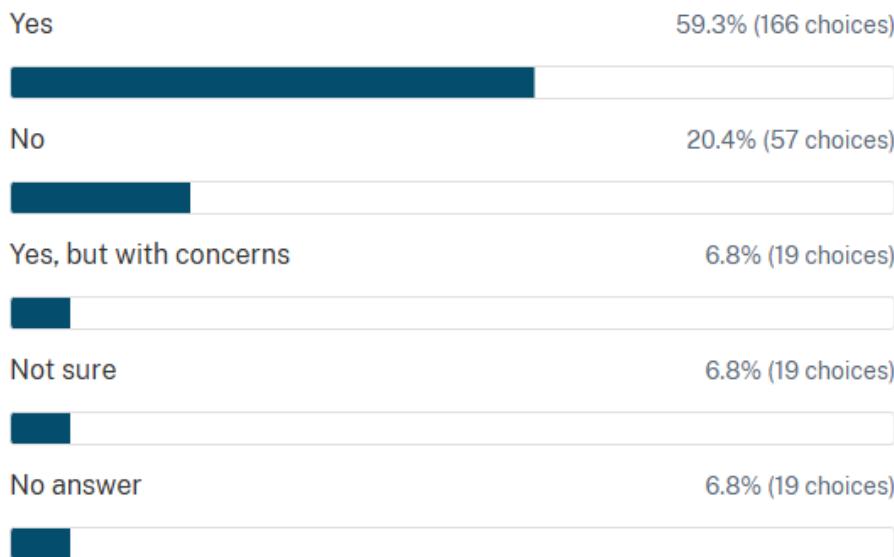
Safety improvements, particularly for pedestrians, are welcomed overall, especially the need for better pedestrian crossings and safety measures for elderly and less mobile individuals. Conversely others question the necessity of any changes and express concerns about their impact on traffic flow and local businesses. The proposals have been co-designed with input from businesses.

The impact on local residents, particularly in terms of noise and loitering outside drinking establishments was raised as a concern for some, although it must be pointed out that the licensing terms are outside the scope of the project's influence.

In summary, there is majority support for the Druid St changes, seeing it as a positive step towards better cycling infrastructure. However, there was a call for careful consideration for preservation of existing trees on or near the cycle lane and significant concerns about traffic congestion, the impact on local businesses, and the potential negative effects on residents. The balance between different road users' needs and the specifics of the cycle lane design are key points of contention.

Do you support the changes to Stanworth Street and Gedling Place to restrict through traffic and make it access only?

There were 261 responses to this question. As you can see overall there is strong support:



There was also a free form text box that followed this question, where respondents were encouraged to give details or explain further any concerns, summarised below. Only the top five themes have been shown this time because the next five mentions were tied on many disparate topics with only single mentions – these have been picked up in the text analysis below where relevant.

Top Five Themes:	Count (no. of responses)
Against the traffic filter	11
Traffic Congestion	10
Anti-Social Behaviour of cyclists	10
Parking Stress	5
Supports the traffic filter	5

Respondents expressed concerns about the impact of the proposed changes on local traffic, parking, and accessibility. Many were worried that the changes could lead to increased congestion, particularly during times when nearby tunnels or bridges are closed. There were a couple of comments specifically about access for emergency services but as a key stakeholder all blue lights services have been engaged in the development of the proposals.

Safety concerns have been raised, with repeated mentions of dangerous cycling behaviour and the need for cyclists to adhere to traffic laws. The potential negative impact on pedestrians, especially the elderly and those with disabilities, has been mentioned, with fears that the new cycle route proposals could make crossing roads more hazardous.

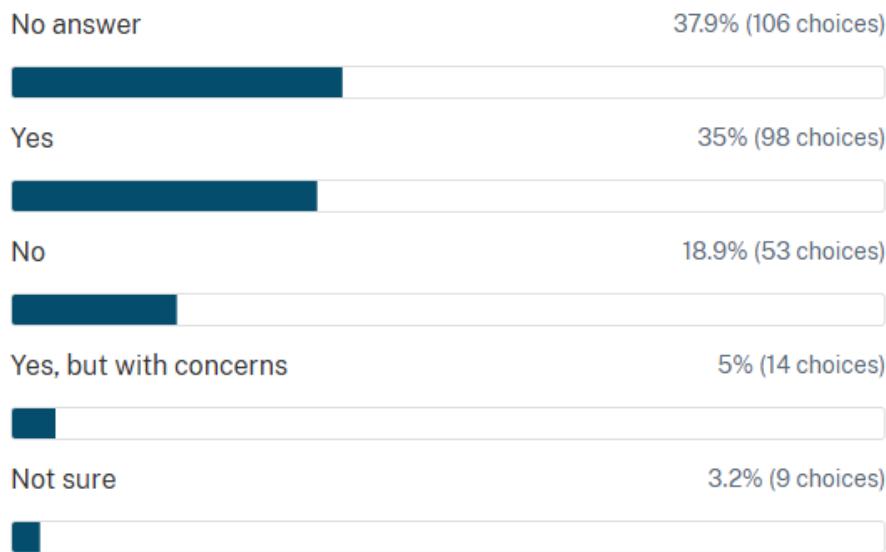
A few respondents suggested that existing cycle lanes are underused and question the necessity of additional ones so close by. Whilst there are other routes nearby, none of these meet the current cycle design guidance. The proposal to link TfL's C10 and C14 cycleways is a Council ambition to increase cycling amenity as part of the grid of routes developed from the Streets for People engagement. It also aligns with the Mayor's strategy to have residents living within 400m of a cycle route. Connectivity to other routes was mentioned, in particular to/from Enid Street which is a destination for delivery bikes, as well as patrons of the lowline.

Those who support the proposal believe it will promote healthier streets and active mobility. Suggestions for improving the plan include alternative cycle segregation, addressing the poor quality surfacing (both footway and carriageway) of Gedling Place and adding more native planting to aid biodiversity.

Overall, there is majority of support for the cycle route measures proposed on Gedling Place, but the specific concerns regarding inclusivity and safety will be addressed in the subsequent detailed design stage.

Do you support the changes to Neckinger to create a segregated contra-flow cycle lane and a better aligned cycle crossing on Abbey St?

There were 174 responses to this question. As you can see overall there is strong support:



Respondents had the opportunity to elaborate on their response. Of those most frequently mentioned were negative responses towards the removal of parking. The loss of parking also dominated the discussion for the drop-in events. This is unsurprising given the number of parking spaces to be removed (47) and the impact that it will have on residents. The design has already been amended to retain as many parking bays as possible and in the detailed design stage it will be further reassessed to see if more spaces can be provided, either directly on the route or nearby, to lessen the impact.

Parking surveys were carried out in July and October 2024, and the results showed that Neckinger and surrounding streets do not have high parking stress and are able to absorb the losses.

Top Ten Themes:	Count (no. of responses)
Against removal of parking	14
Against the reversal of Neckinger One-Way direction	8
Against investment for more cycle facilities	6
Supports removal of parking	5
Against the banned right turn into Abbey St from Neckinger	5
Type of cycle segregation	5
Traffic congestion	5
Traffic displacement	5
Supports the reversal of Neckinger One-Way direction	3
Anti-Social Behaviour of cyclists	3

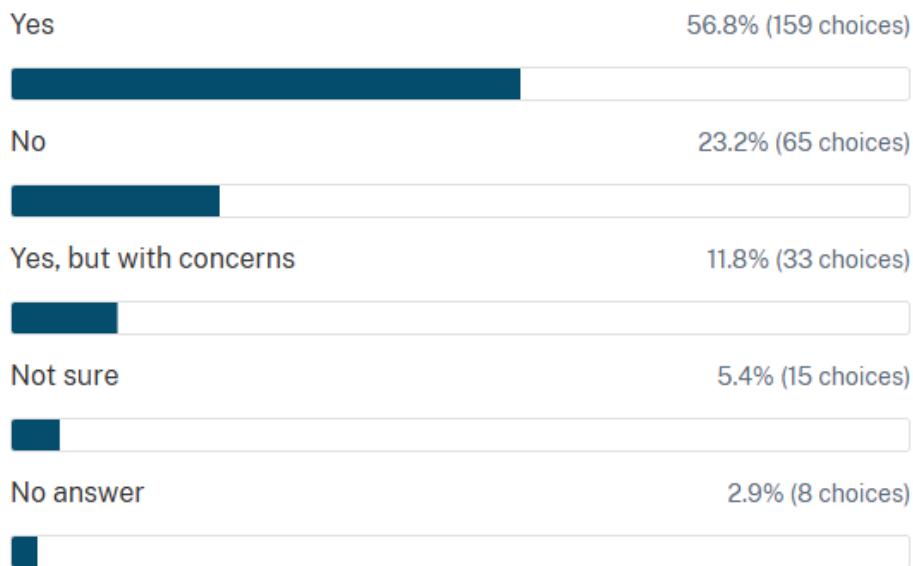
The reversal of the direction of Neckinger from southbound to northbound also received comments, as respondents fear it could create more through traffic. Some preferred the right turn to be enabled as this would create an easier route for them, but this would raise traffic volume to unacceptable levels as it would almost certainly attract traffic heading to Jamaica Road / Tower Bridge. Similarly, there were concerns about the potential increase in traffic on alternative parallel routes due to the network changes, such as Grange Walk, Maltby Street, Enid Street and through the Neckinger Estate. The impact on area-wide traffic will be monitored as part of the scheme.

On the other hand, there is support for the project from those who believe it will improve pedestrian and cycle connections, and some respondents appreciate specific aspects such as the widening of pavements, improvements to crossings and protection for cyclists. There are suggestions for further improvements, such as clearer priority markings for pedestrians and cyclists at side roads, a new zebra crossing on Neckinger itself, and suggestions to look into alternative types of cycle segregation.

There were also more responses about the route being unnecessary and that investment of public money should be spent on other causes, such as street cleanliness. Respondents were worried about the safety implications of the new cycle route, mentioning the danger posed by fast-moving cyclists, especially during rush hour, and the need for better enforcement of traffic rules. Whilst this is outside the scope of the project it should be noted that this was a prevalent theme and the strength of feeling is very high against anti-social behaviour of cyclists. The detailed design should look into designing this out where possible.

Do you support the changes to the Grange Road junction with Spa Road?

There were 272 responses to this question. Overall 56.8% were in support, and a further 11.8% supported the changes but with concerns to be addressed. There were 23.2% against.



Overall, while there is majority support for the cycle route project, many respondents voiced significant concerns regarding the design of the crossing. Specifically, the 'shared use' footway with most preferring instead separation of cyclists from pedestrians. There were concerns about the positioning of the cycle crossing not being on the desire line for cyclists and therefore potentially missing the mark as it will not be used. For example one respondent claimed:

"It's more likely they [cyclists] will cross Grange Road directly as they do currently. I don't think this plan adds anything. If I'm with my 7 year old son then we get off our bikes and walk across the zebra crossing. We would do exactly the same under this plan."

Top Ten Themes:	Count (no. of responses)
Against shared space	15
Cyclists won't use it	15
Traffic speeding	9
Traffic congestion	8
Prefer alternative cycle route	7
Anti-social behaviour of cyclists	7
Against footway widening	7
Against investment for more cycle facilities	4
Supports the improved safety for cyclists	3
Zebra crossing on Spa Road	2

The crossing will be looked at again in the detailed design stage to investigate if pedestrian and cyclist conflict can be reduced and see if anything can be done to move it closer to the desire line for the route.

Comments about speeding on Spa Road were frequent, with suggestions for traffic calming measures such as chicanes or improved speed bumps. The need for pedestrian safety, especially for the elderly and less mobile, is highlighted, with requests for a formal crossing to the park at Spa Gardens near Sainsbury's.

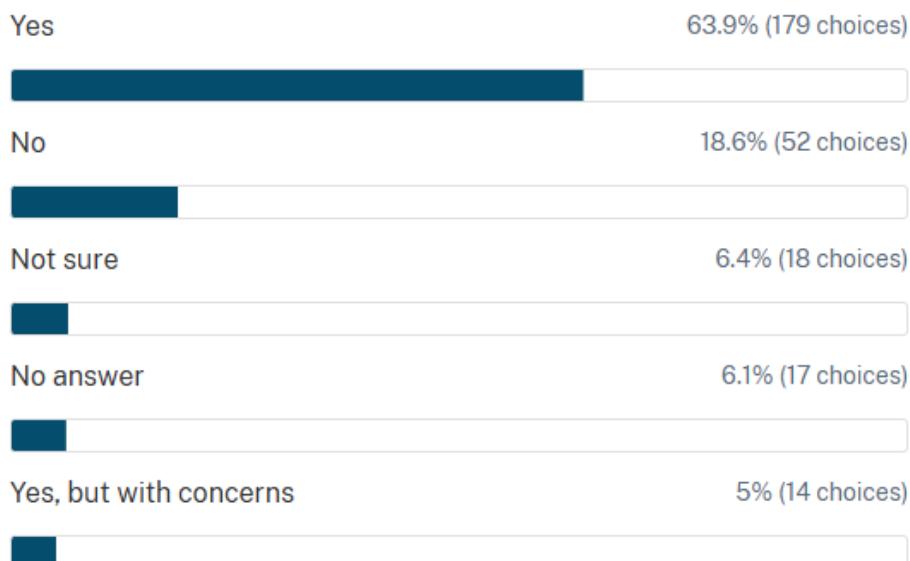
Some respondents raised concerns about the impact on traffic flow and emergency vehicle access due to footway widening and narrowed roads. The design has included vehicle tracking to ensure buses, refuse lorries, HGVs and fire trucks can travel unimpeded. Some pointed out that the footways were wide enough already and further widening was unnecessary. However the widening will contribute to lower speeds and pedestrian safety outside the park and around the crossing.

The Grange is mentioned as a problematic area, with suggestions to make it one-way to alleviate traffic issues and potentially use it for the cycle path instead of the proposed alignment along Neckinger and Spa Road. Officers will observe the current situation on The Grange to see if any improvements can be made but this is outside the scope of the project and will be subject to securing additional funding. The Grange is not suitable for the cycle route as this would mean directing cyclists to travel on short sections of Abbey Street and Grange Road (instead of crossing them straight over) which are both too heavily trafficked and unsuitable for cycling improvements.

Overall, while there is support for improving cyclist and pedestrian infrastructure, there is significant apprehension about the current design with shared use and so changes will be investigated in the detailed design to improve these issues.

Do you support the traffic calming and buildouts to slow vehicle speeds at the Willow Walk junction with Curtis Street?

There were 263 responses to this question, with 63.9% in favour and 5% in favour but with reservations. Only 18.6% were against the proposal and their arguments are considered below.



Top Five Themes:	Count (no. of responses)
Anti-Social Behaviour of cyclists	9
Concerns regarding pedestrian safety	7
Against investment for more cycle facilities	5
Against shared space	4
Traffic Volume	3

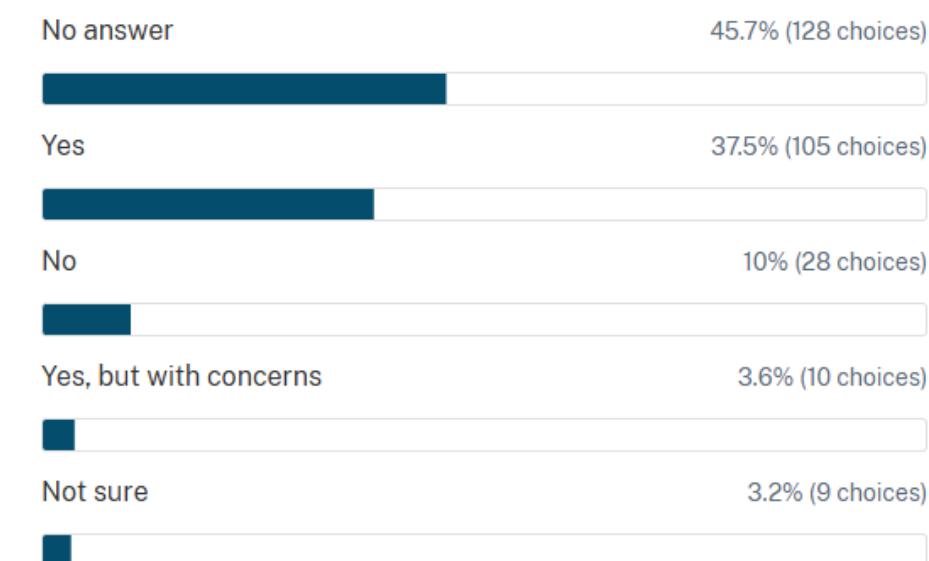
The top issue, which has been a recurring theme across all survey questions, was the anti-social behaviour of cyclists. There was clear exasperation about cyclists lack of compliance to traffic signals, posing risks at crossings, and illegal e-bike and e-scooters travelling too fast. Many related comments argued that the safety of pedestrians is threatened by anti-social cycling, and that clear separation between cycle lanes and pedestrian paths is needed to prevent accidents.

Some respondents feel that the current infrastructure does not pose a danger and that the proposed changes are unnecessary with the funds being better spent elsewhere.

This position was contradicted by other comments which suggested that the traffic speed and volume was a problem. The need for better road safety measures, such as a formal pedestrian crossing and traffic calming was mentioned. Some responses also called for traffic reduction measures such as modal filter on Willow Walk to make it safer for cycling. We have had traffic surveys carried out near this junction and it is considered safe to mix cyclists with traffic due to the low volume. There is traffic calming proposed as part of the scheme to lower speeds.

Do you support the replacement of chicane guardrail with bollards at Bacon Grove / Curtis Street to allow for better cycle and pedestrian access?

152 responses show majority support at 37.5%, 3.6% support but with concerns and 10% against.



Respondents expressed concerns about the safety of pedestrians by opening up the route to potential misuse by motorbikes and mopeds, with suggestions that if the barriers are removed then camera enforcement might be the only way to prevent this. Conversely the existing barriers are described as awkward and unfriendly to cyclists, and there is support for their removal in favour of bollards to improve accessibility.

The intersection at Bacon Grove/Curtis Street is highlighted as a dangerous area for pedestrians, with a need for better protection from speeding cyclists. There are calls for separation between cycle lanes and pedestrian paths to ensure safety for all, especially the most vulnerable road users.

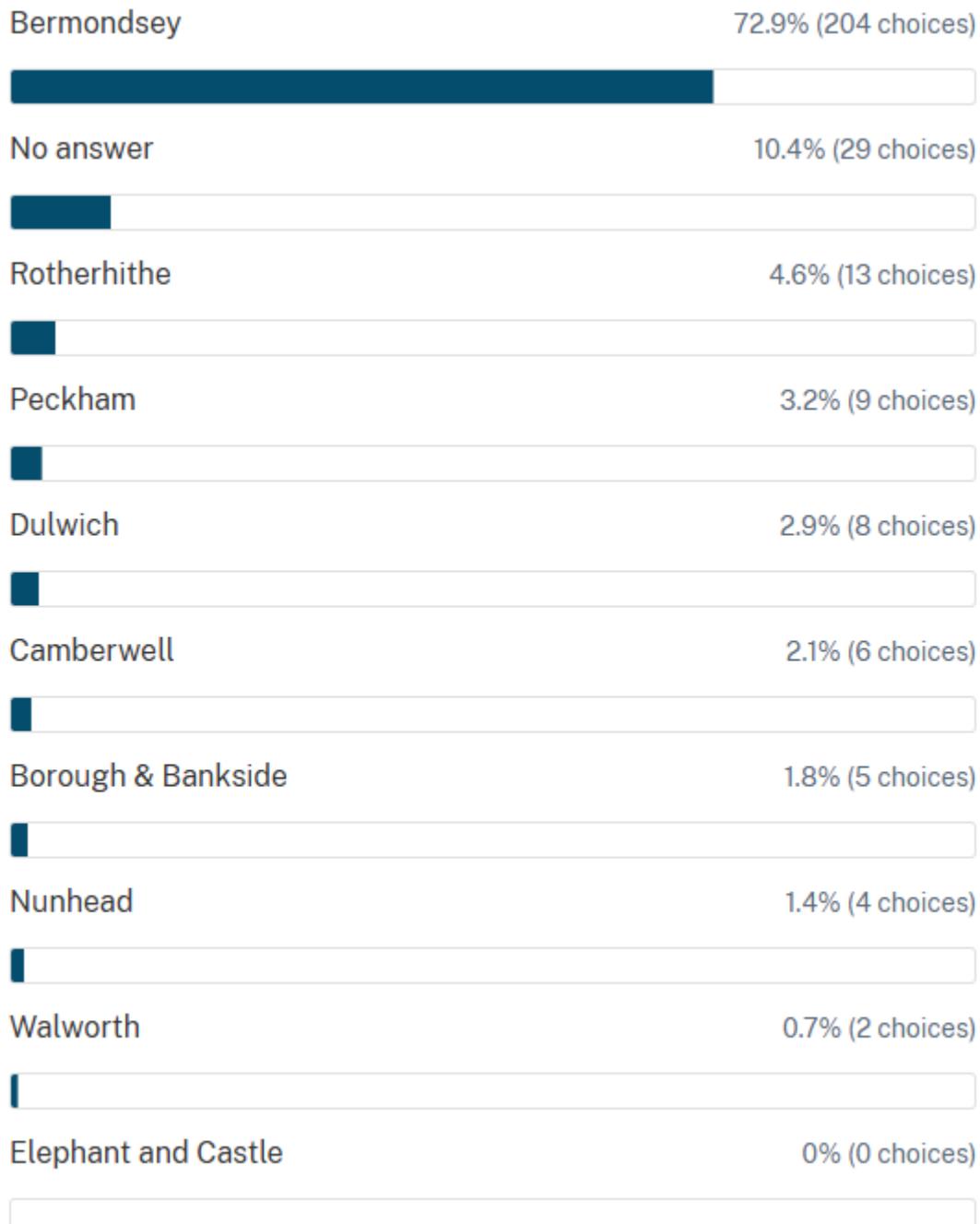
Overall, it is clear there needs to be a balance between protecting pedestrians using the route, making it more accessible for wheelchairs, cargo bikes and mobility scooters, but preventing access to motorised two-wheelers. Following this feedback the design will be investigated to see if separation for different transport modes is possible and perhaps to look into a more innovative solution than just bollards.

Top Ten Themes	Count (no. of responses)
Pedestrian Safety	9
Separation of cyclists and pedestrians	7
Concern over misuse by mopeds / motorcycles	6
Speed control of cyclists	6
Anti-social behaviour of cyclists	6
Against shared space	5
Route design	4
Advocate of removal for better accessibility	4
Request for CCTV enforcement	3
Illegal E-bikes / E-scooters	3

Again there were arguments made in favour of alternative routes, particularly the alignment using Alscot Road and then Alscot Way. However the proposed route has been carefully designed and selected according to what interventions are possible to meet minimum design guidance for cycling. Alscot Way involves using a quiet residential cut-through which is not public highway and therefore not subject to the same maintenance and control of the Council's Highway Authority. Permissions for interventions from the private landowner might be refused. It is already gated and theoretically through access could be prevented at any time.

If you live in Southwark, which community area do you live in?

There were 251 responses to this question. It shows a strong bias for Bermondsey residents (72.9%) which is good for the survey showing that the vast majority of the responses were local.



Equalities

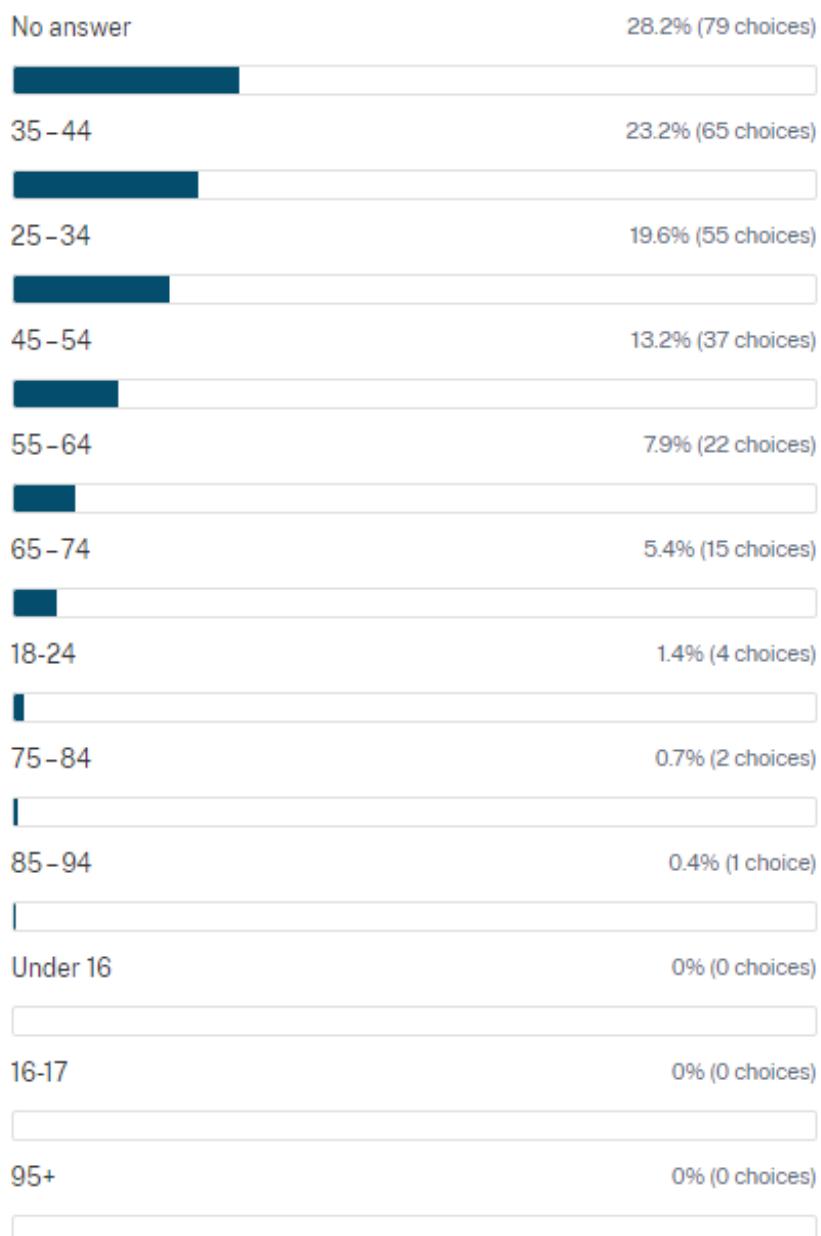
The following section looks at the demographical information provided by respondents. It should be noted that this section was optional and so the response rate has been included for each. In some cases the percentage of *those that have responded* is provided, rather than the overall response. This is because the proportion of those that didn't answer the optional demographic questions was quite high and therefore misleads the results. Where this analysis has been applied we have taken care to make note of it.

Age

There were 201 responses to this part of the question, most of which selected 'no answer'.

15. Age

201/280-Multiple choice -choose one -optional



We received more responses from residents aged under 45 (124) compared to older residents (77). TfL's travel in London report found that younger and older residents were among the most vulnerable road users. There were no care homes within the consultation area, however there were schools nearby. Each of the schools were emailed, delivered letters and visited in person to ensure they were aware of the proposals.

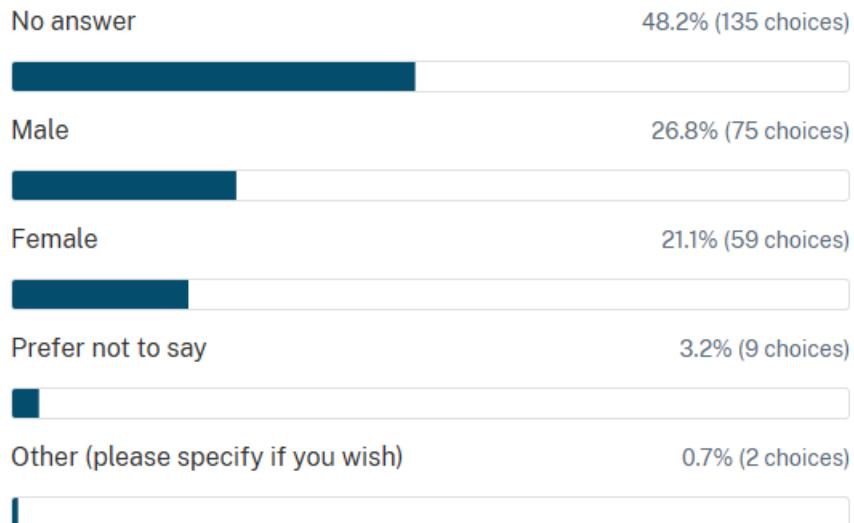
What is your ethnic background?

There were 159 responses to this part of the question (57% response rate). The below table lists the percentage breakdown for ethnicity of these 159 respondents who answered:

Ethnicity	Percentage of responses
(Asian) British	1%
(Asian) Chinese	3%
(Asian) Indian	1%
(Asian) Other (please specify if you wish below)	1%
(Black) British	1%
(Black) Caribbean	1%
(Black) Nigerian	1%
(Black) Other African (please specify if you wish below)	1%
(White) British	43%
(White) English	11%
(White) Irish	4%
(White) Northern Irish	1%
(White) Other (please specify if you wish)	2%
(White) Other European	18%
(White) Scottish	1%
(White) Welsh	1%
Latin American	3%
Mixed Other background (please specify if you wish)	1%
Mixed White/Black African	1%
Mixed White/Asian	1%
Mixed White/Black Caribbean	1%
Hispanic	1%

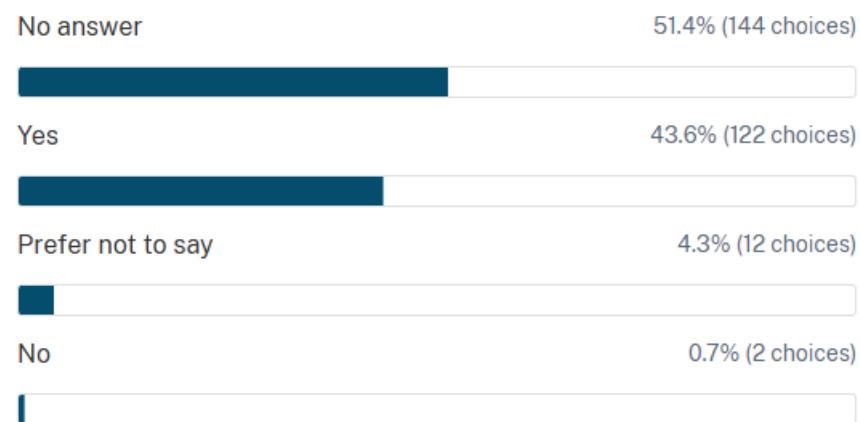
What is your sex as recorded at birth? (a question about Gender Identity followed)

There were 145 responses to this part of the question. Of those 145 respondents 52% were male and 41% were female. The remaining percentages were either 'preferred not to say' (6%) or Other (1%).



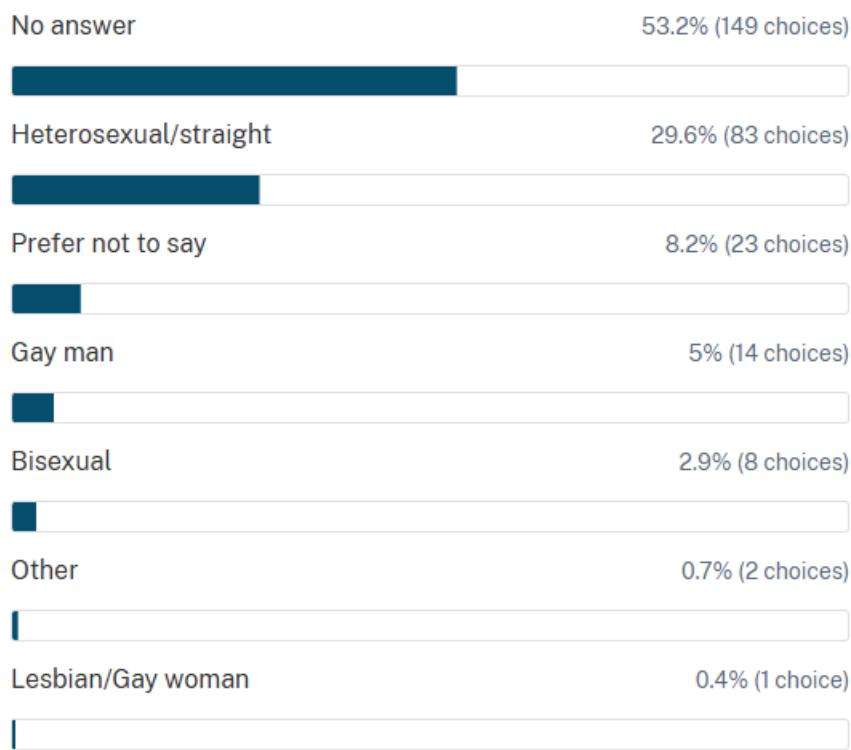
Is the Gender you identify with the same as the sex you were recorded at birth?

To follow up on the previous question we asked about gender identity. There were 136 responses and of these responses 90% answered affirmative. 12 respondents selected 'prefer not to say' and 2 respondents answered that their gender was different from the sex they were recorded at birth.



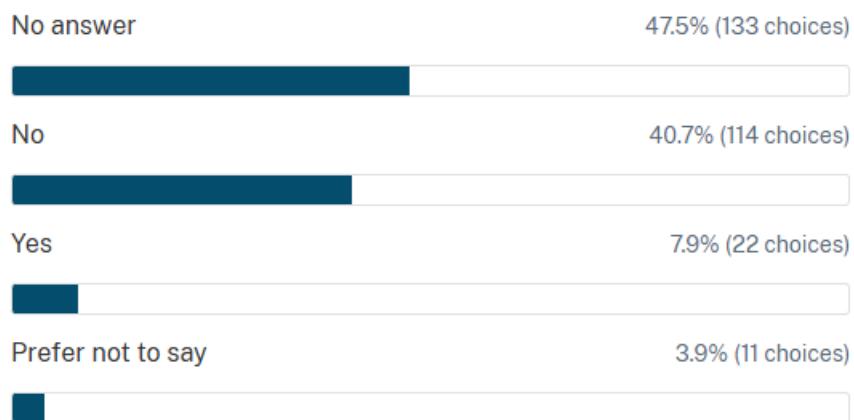
Which of the following best describes your sexual orientation?

There were 131 responses to this question. Of those who chose to answer 63% identified as heterosexual and 18% preferred not to say. The remaining 18% identified as gay, bisexual, lesbian or other (specified as queer or asexual).



Are you disabled?

There were 147 answers to this question.

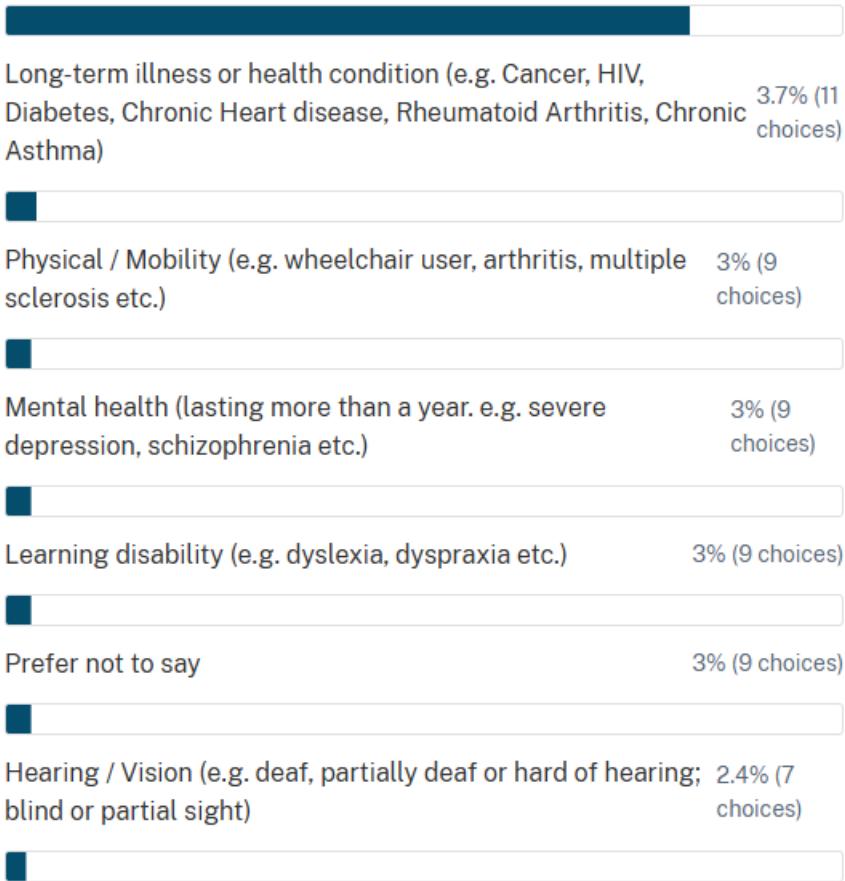


Of the 280 total survey responses 22 said that they were disabled.

According to the 2021 Census 8.2% of people in Southwark are disabled under the equality act: as defined that their day-to-day activities are limited a lot due to their disability. A further 9.4% of people in Southwark are disabled under the equality act: defined as day-to-day activities limited a little. Across London, 13.2% of people are disabled (using the definition under the Equality Act 2010).

A follow up question asked for respondents to specify their type of disability:

No answer 81.8% (242 choices)

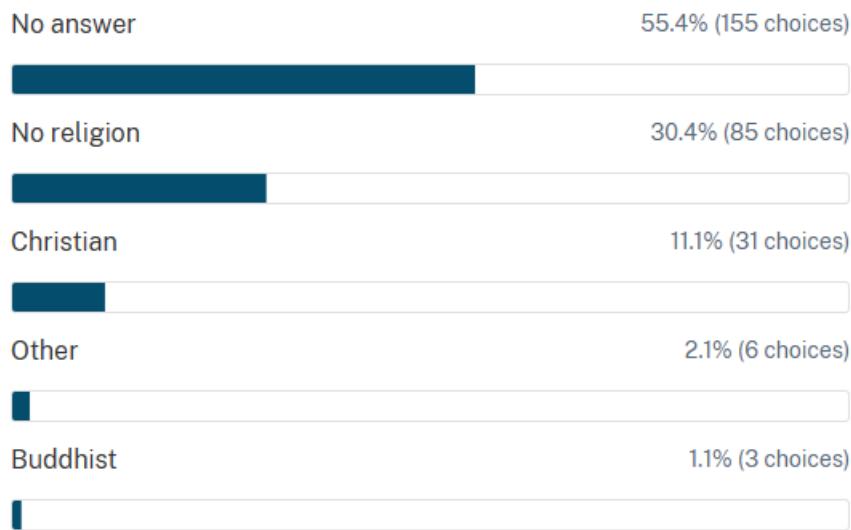


As you can see there is a range of different types of disability from residents affected by the scheme. The design has been subject to an Accessibility Review by industry experts to make sure that it is inclusive. This has been discussed further in the Equalities Impact and Needs Assessment (EINA) to review and provide design changes and mitigations.

What is your religion or belief?

There were 125 responses to this question. As you can see there is a high number of respondents with either no religion or preferring not to answer. Of those that did answer, 'Christian' was the most popular option (11.1%), then 'Other' (2.1%) and Buddhist (1.1%).

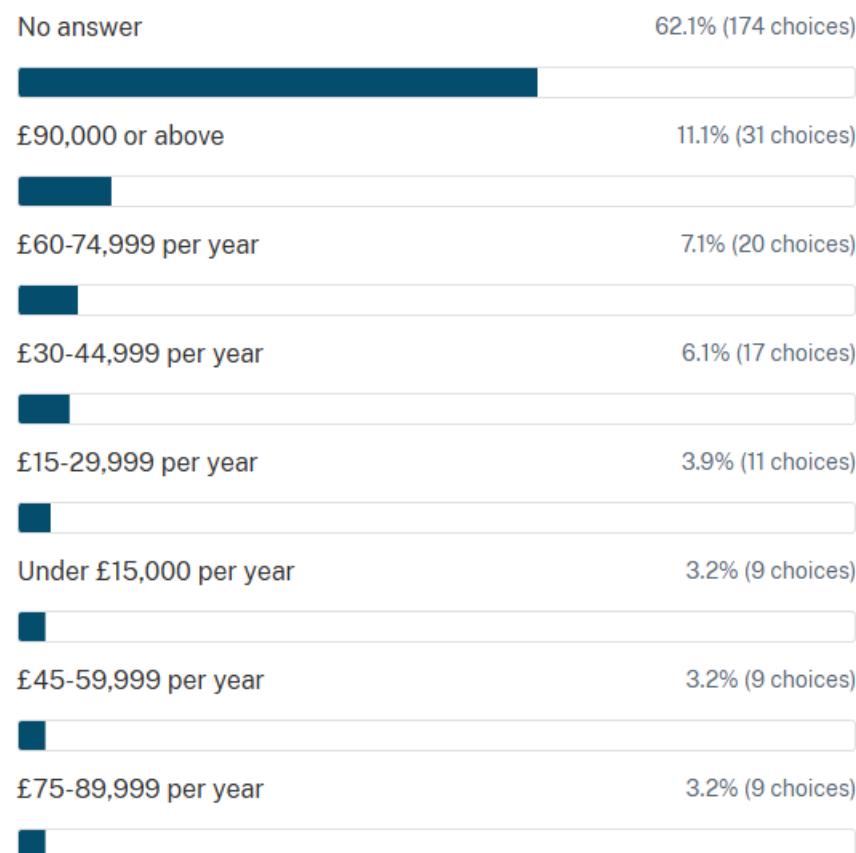
A list of faith groups in the area was provided by Southwark's Consultation & Involvement Team, these were emailed and followed up with phonecalls where numbers were provided. Visits were undertaken to provide extra flyers and meet in person where possible.



(There were more categories provided but as they had 0 choices they have been omitted from the graph).

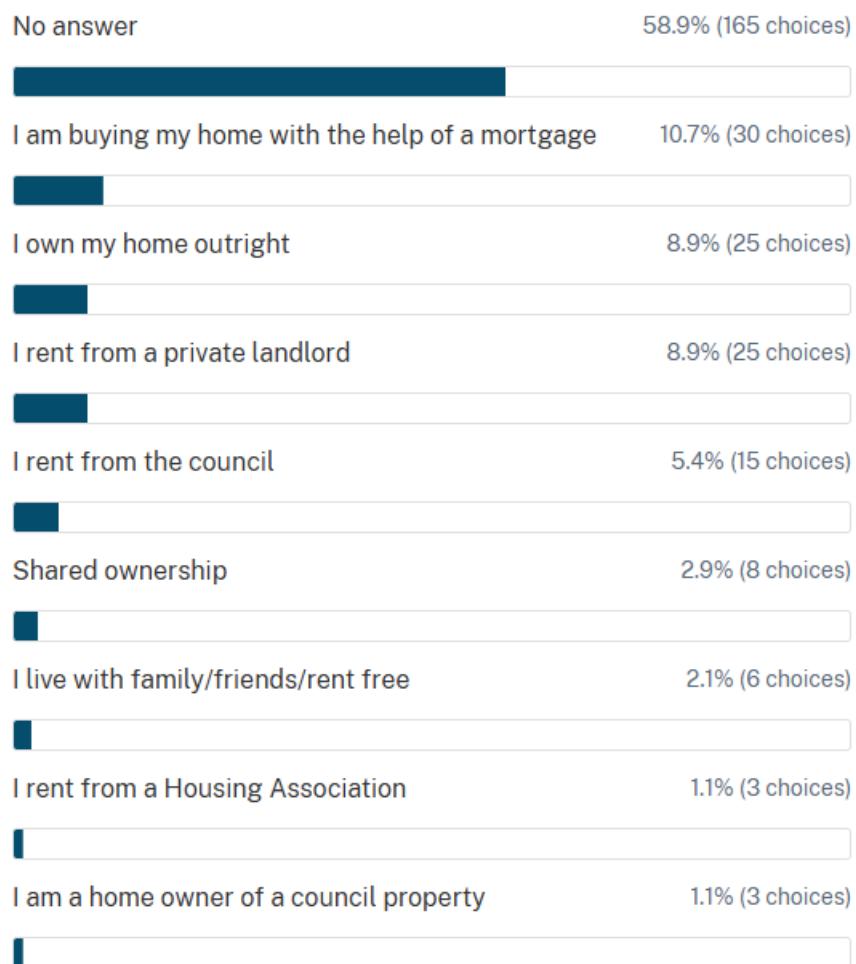
Approximately, what is your household income (the combined income of all the people in your home)?

It was optional to answer, and there were only 106 responses to this question.



What is your current housing situation?

There were 115 responses to this question.



Both the above demographics point to a skew towards homeowners and higher income brackets in response rates.

In order to give everyone a chance to fill out the survey we set up a gazebo on the route and were pro-active in interviewing anyone who passed. This took place later in the day after conventional working hours (5pm – 7pm) to increase awareness of the survey and try to give everyone a chance to have their say.

Conclusion

A total of 280 people responded to the consultation, which is a good response for this type of consultation activity. Of these 73% were from Bermondsey which reflects the local opinion well.

Nevertheless, we should not discount the opinions of those that don't reside in the immediate streets, who instead took the survey because they live elsewhere in Southwark and travel through the area, given that they would see the benefits of improved road safety provided by the scheme.

The design was well received overall with the following positive endorsements from most respondents, the headline figures being:

- 68% agreed or agreed with some concerns to the changes to Druid Street
- 56% agreed or agreed with some concerns to the changes to Stanworth St and Gedling Place
- 40% agreed or agreed with some concerns for the changes to Neckinger (this was a majority as 19% said no, and the remaining either didn't answer 38% or weren't sure 3%)
- 69% agreed or agreed with some concerns for the junction changes to Grange Rd / Spa Rd
- 69% agreed or agreed with some concerns for the changes to Willow Walk / Curtis St
- 41% agreed or agreed with some concerns for the changes to Bacon Grove/ Curtis St

Despite the overall positivity there were a significant number of responses which had constructive feedback specific to the proposed design. These will be used to inform the next stage of design.

Impact on Businesses and the Community

The commercial units on Druid Street were engaged from a very early stage. It was acknowledged in the previous consultations for the temporary scheme that their loading and operations would need to be improved. Extensive engagement followed and the businesses were consulted during the optioneering and design development.

Local shops, nurseries, schools and garages situated on the streets were also visited to raise awareness of the proposals and provide them opportunity to have their say.

More engagement is necessary to reach out to affected businesses to ensure they are supported and involved in the design process. For example the new footway on Druid Street may require some accommodation works the extents of which will become clearer in the detailed drainage design.

Further engagement with the schools and other community organisations needs to happen during the next design development stage. This will ensure that we provide the best possible solution and have community input to finalise the design. In particular, for local issues such as Bacon Grove and Curtis Street throughfare.

Recommendation

It is recommended that the cycle route is implemented and the specific feedback received from the consultation is considered in the development of the subsequent detailed design stage.

Appendix 1

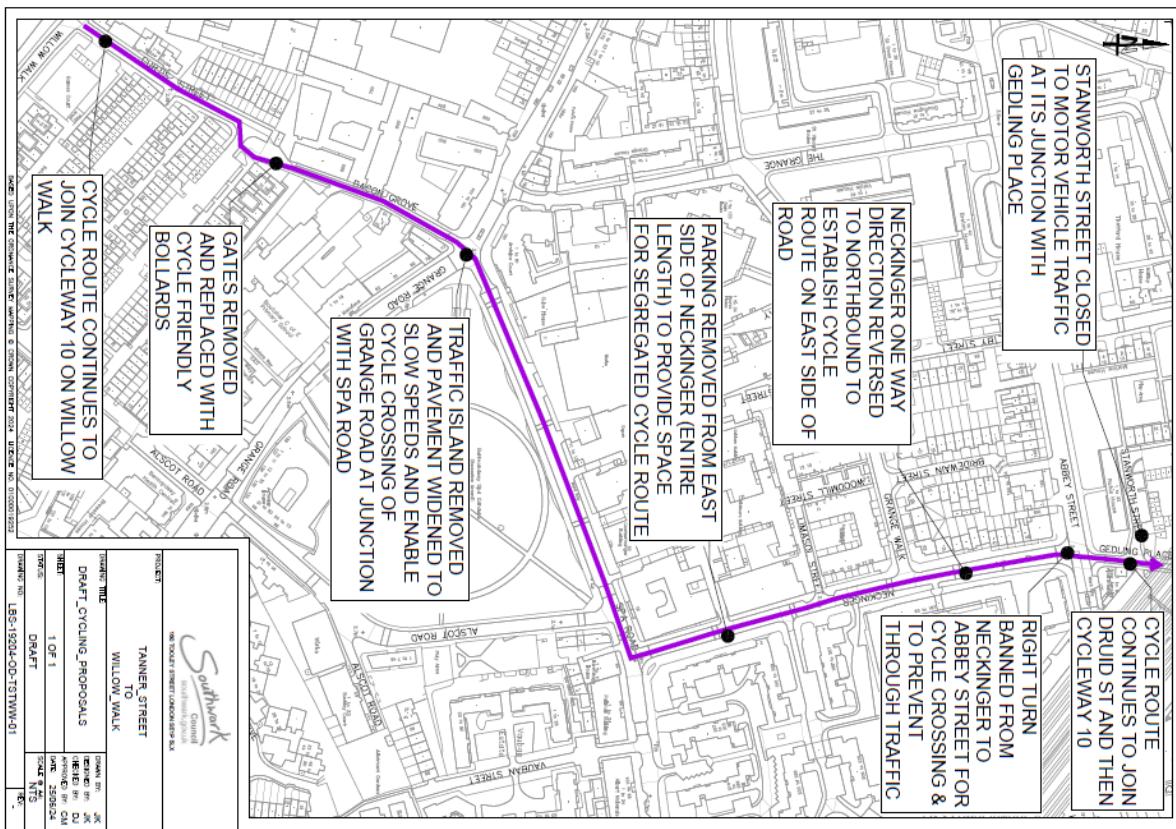
A4 letters delivered to Druid St businesses (Phase1)

<p>Highways Team Environment, Neighbourhoods and Growth Southwark Council 160 Tooley Street PO BOX 64529 London SE1P 5LX</p> <p>17th November 2023</p> <p>Dear Sir/Madam,</p> <p>Ref: Druid Street Improvements Scheme</p> <p>In 2022 Southwark Council installed a two-way cycle track on Druid Street from Tanner Street to Gedling Place. Gedling Place was closed to motorised traffic to make cycling and walking easier. These changes were implemented in the first phase of works to create a new cycle connection linking up with TfL's existing routes between Tanner Street and Willow Walk.</p> <p>The changes were initially installed on a trial basis and after a consultation review in November 2022 the traffic restrictions were then made permanent.</p> <p>Continuation of the cycle route from Gedling Place towards South Bermondsey is in the design phase and as part of this design we are looking to see what we can do to improve Druid Street one year later.</p> <p>We would like to hear from the businesses on Druid Street to feed in to the design for the next stage.</p> <p>The project team will be paying visits in person to affected businesses on the morning of Wednesday 22nd November 2023 to survey the needs of the occupiers of the railway arches. If this time is not convenient then please get in contact (details below) if you have anything that you would like to discuss.</p> <p>The responses will be reviewed with the design team to inform subsequent design for improvements. Design options will then be fed back to stakeholders to review design options before proceeding to a draft outline design.</p> <p>Kind regards,</p> <p>Josh Kerry Project Manager Highways Environment, Neighbourhoods and Growth 160 Tooley Street PO BOX 64529 London SE1P 5LX Email: josh.kerry@southwark.gov.uk Phone: 07761046489</p>
<p>Highways Team Environment, Neighbourhoods and Growth Southwark Council 160 Tooley Street PO BOX 64529 London SE1P 5LX</p> <p>10th January 2024</p> <p>Dear Owner/Occupier,</p> <p>Ref: Druid Street Improvements Scheme</p> <p>In December 2023 Southwark Council officers, accompanied by Councillor Sam Dalton, visited all businesses on Druid Street to gather feedback about what further improvements could be made to the highway.</p> <p>We managed to engage with all occupied units and have fed this information back to our design team. We now have a few options sketched up and would like to revisit affected businesses on the morning of Wednesday 17th January 2024 (from 10am onwards) to present these options and gather feedback.</p> <p>If this daytime is not convenient then please get in contact (details below) if you would like to arrange an alternative appointment or discuss via phone / Teams.</p> <p>The responses will be reviewed and further changes made if necessary. We will then proceed to a final outline design to take forward to implementation later this year.</p> <p>Kind regards,</p> <p>Josh Kerry Project Manager Highways Environment, Neighbourhoods and Growth 160 Tooley Street PO BOX 64529 London SE1P 5LX Email: josh.kerry@southwark.gov.uk Phone: 07761046489</p>

Appendix 2

Letter delivered to properties fronting the route (Phase1)

 Environment, Neighbourhoods and Growth Southwark Council 160 Tooley Street PO Box 64529 London SE1P 5LX	
Highways Team STANWORTH STREET CLOSED TO MOTOR VEHICLE TRAFFIC AT ITS JUNCTION WITH GEDLING PLACE	
9th July 2024	
Dear Owner/Occupier,	
Ref: Tanner Street to Willow Walk Cycle Route	
<p>Southwark Council is improving walking and cycling routes as part of Streets for People, our ambitious plan to improve the air we breathe in Southwark.</p> <p>We are planning to put in a new cycle route from Tanner Street to Willow Walk, linking TfL routes C10 and C14 in Bermondsey. The proposal is currently at the design stage and is planned for construction next year, 2025.</p> <p>We would like to hear from directly affected residents and businesses, to feed in to the design for both cycling and walking improvements. Please see initial plans for the route on the other side of this letter.</p> <p>We will be holding a drop-in session for residents to come and discuss the proposals from 3pm – 6pm on Wednesday 17th July 2024 in the Kagyu Samye Dzong Tibetan Buddhist Centre at 15 Spa Rd, London SE16 3SA.</p> <p>If this day/time is not convenient then please do not hesitate to get in contact directly via email highways@southwark.gov.uk or scan the QR code to leave comments via the map online: https://engage.southwark.gov.uk/en-GB/projects/tanner-street-willow-walk-cycle</p>	
	



Appendix 3

A5 double-sided flyer delivered to 5174 addresses (Phase 2)

Tanner Street to Willow Walk cycle route

We want to hear your views on proposals to introduce a new cycle route linking TfL Cycleway C14 at Tanner Street to TfL Cycleway C10 at Willow Walk.

We're improving walking and cycling routes as part of Streets for People, our ambitious plan to improve the air we breathe in Southwark. As part of this, we're creating a network of safe and accessible streets and routes for all types of cycles, and people of all abilities, ensuring Southwark is a borough in which everyone who would like to cycle, can. This scheme includes making changes to the temporary cycle path on Druid Street, as well as making walking and cycling improvements to Gedling Place, Abbey Street, Neckinger, Spa Road, Grange Road, Curtis Street and Bacon Grove (see map). We want your views on these proposals and any additional measures that would make the area more attractive and easy-to-use for residents.



STREETS FOR PEOPLE
LONDON BOROUGH OF SOUTHWARK



To find out more and have your say please complete the online consultation form at:

<https://engage.southwark.gov.uk/en-GB/projects/tanner-street-willow-walk-cycle/2>

Alternatively scan the QR code below for direct access to the survey



To request a paper copy of the questionnaire please write to:

Freepost: RSCE-TGHU-CUZB,
Highways
Tanner St to Willow Walk Cycle Route
3rd Floor, Hub 2,
160 Tooley Street,
London, SE1 2QH

The results of this questionnaire, as well as the engagement events will be used to produce a report on how to proceed.



Appendix 4

A3 Poster erected on lamp columns (phase 2)

Tanner Street to Willow Walk cycle route

We want to hear your views on proposals to introduce a new cycle route linking TfL Cycleway C14 at Tanner Street to TfL Cycleway C10 at Willow Walk.

We're improving walking and cycling routes as part of Streets for People, our ambitious plan to improve the air we breathe in Southwark.

We want your views on these proposals and any additional measures that would make the area more attractive and easy-to-use for residents.



To find out more and have your say please complete the online consultation form at:

<https://engage.southwark.gov.uk/en-GB/projects/tanner-street-willow-walk-cycle/2>

Come along to our drop in session on Spa Gardens outside Kagyu Samye Dzong Centre, 15 Spa Road, SE16 3SA on Wednesday 18 September 2024, 3:00pm to 6:00pm.

Alternatively scan the QR code below for direct access to the survey

To request a paper copy of the questionnaire please write to:
Freepost RSCE-TGHU-CUZB, Highways, Tanner St to Willow Walk Cycle Route
3rd Floor, Hub 2, 160 Tooley Street, London, SE1 2QH

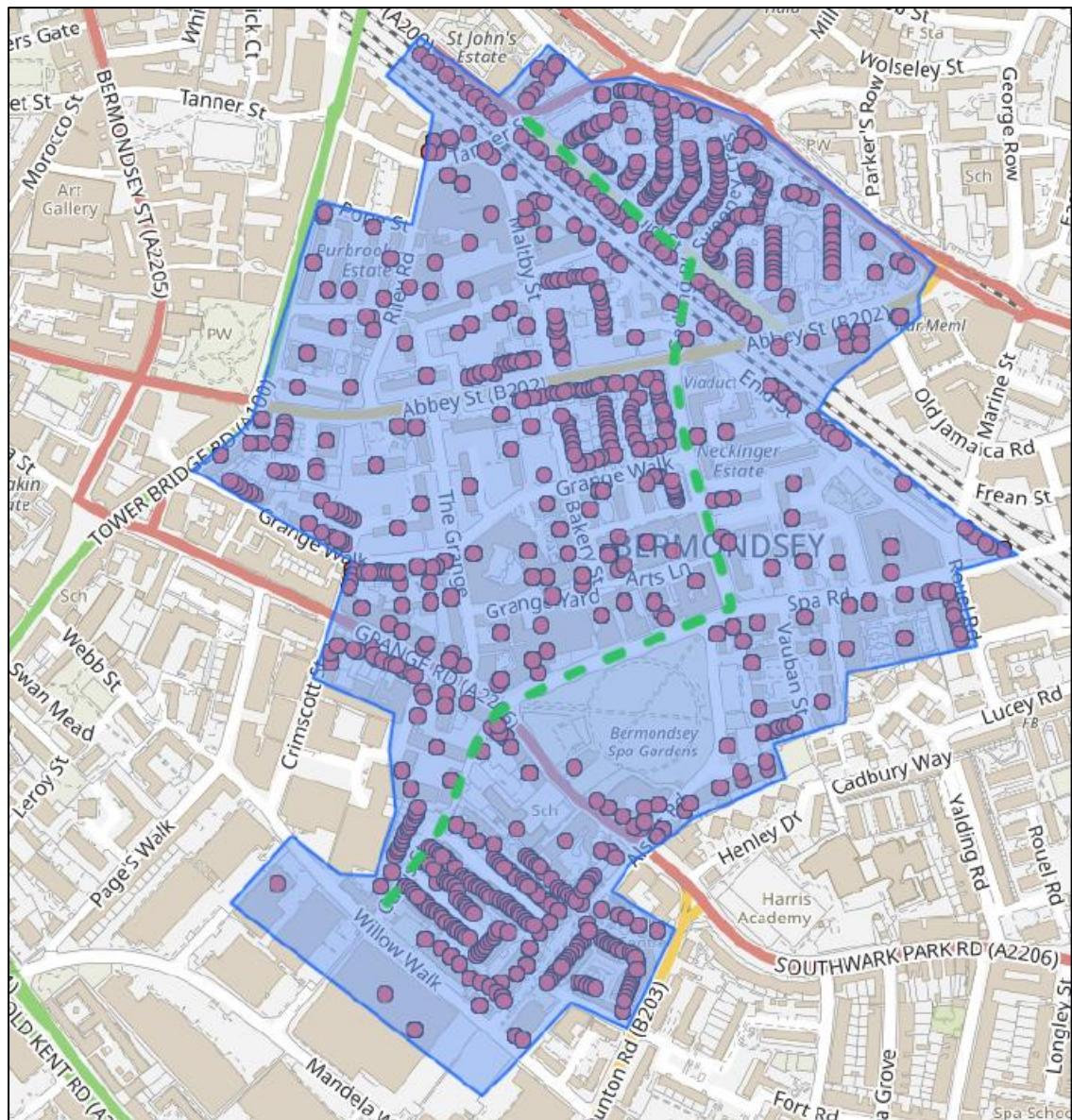


STREETS FOR PEOPLE
LONDON BOROUGH OF SOUTHWARK

Southwark
Council

Appendix 5

Catchment area with 5174 address points (Phase 2)





Equality Impact and Needs Analysis

Tanner Street to Willow Walk Cycle Route

Guidance notes

Things to remember:

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

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

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

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

- proportionate).
- Use insights from engagement with employees, service users and others can help provide evidence for equality analysis.

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

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

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and www.southwarkadvice.org.uk).

Whilst the equality analysis is being considered, Southwark Council recommends considering implications arising from socio-economic disadvantage, as socio-economic inequalities have a strong influence on the environment we live and work in. As a major provider of services to Southwark residents, the council has a policy commitment to reduce socio-economic inequalities and this is reflected in its values and aims. For this reason, the council recommends considering impacts/needs arising from socio-economic disadvantage in all equality analyses, not forgetting to include identified potential mitigating actions. **The Council has adopted the Socio-Economic Duty as part of its overall equality, diversity and inclusion policy commitments in the Southwark Equality Framework.** This requires us to ensure we do not make any conditions worse for those experiencing socio-economic disadvantage through our policies and practices.

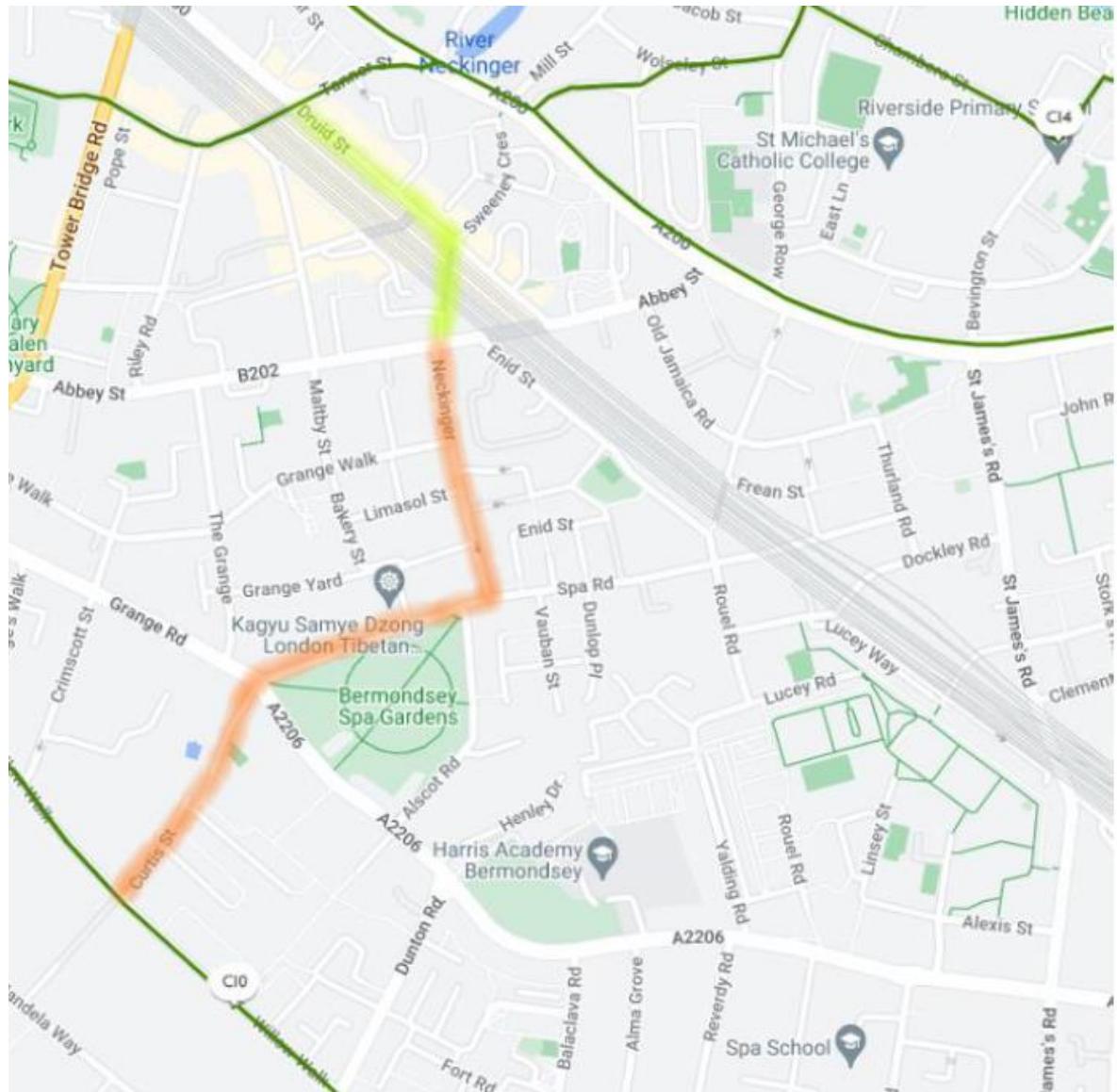
Section 1: Equality impact and needs analysis details

Proposed policy/decision/business plan to which this equality analysis relates	Tanner St to Willow Walk Cycle Route		
Equality analysis author	Josh Kerry		
Strategic Director:	Matt Club		
Department	Highways	Division	Environment & Leisure
Period analysis undertaken	September 2024		
Date of review (if applicable)	October 2024		
Sign-off		Position	

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

1.1 Brief description of policy/decision/business plan

To provide a new cycle route between Tanner Street (TfL Cycleway 14) and Willow Walk (TfL Cycleway 10). The scheme will include changes to the temporary scheme installed on Druid Street and Gedling Place to provide a new footway and improve the public realm.



Yellow highlight = temporary scheme to be amended

Orange highlight = new improvements proposed as continuation of the cycle route

Most of the streets are low trafficked enough for cyclists to share the carriageway with general traffic. However, the route crosses Grange Road (A2206) and Abbey Road (B202) which carry high volumes of traffic. Therefore, we have proposed changes to these junctions to better align and give priority for cyclists on the route. There is also a contraflow cycle lane proposed on Neckinger.

Walking and accessibility improvements are also proposed as part of the scheme including a new footway on Druid Street outside the arches, closure of Stanworth Street to make Gedling Place access only and therefore a more pleasant, safer traffic-free environment for pedestrians. The footways are also proposed to be widened on Willow Walk, Curtis Street, Spa Road and Grange Road.

The route has been designed according to the following guidance:

- Compliance with Southwark Streetscape Design Manual (SSDM)
- Compliance with the London Cycle Design Standards (LCDS)
- Compliance with LTN1-20
- BS8300-2:2018 Design of an accessible and inclusive built environment
- TfL guidance on Wayfinding signage.
- Alignment with the TfL Healthy Streets principles.
- Best practise and guidance on designing for all road users.

This new route forms part of Southwark's ambitious Streets for People Strategy which aims to transform street spaces in Southwark, to transform the travel habits and air we breathe in Southwark, designing streets around the needs of people, not cars.

Southwark carried out a public consultation on this section of cycle route between Tanner Street and Willow Walk from September 5th – 20th October 2024 (total duration 6 weeks).

Consultation drawings were available on Southwark's Engagement website and a public drop in session was held in Spa Gardens in Bermondsey on 18th September and on Druid Street on 10th October 2024.

An online consultation form was publicised via postcard flyers that were circulated to over 5000 addresses in the consultation catchment area. Paper forms were also made available on request.

The results of the consultation has informed recommendations for the the next stage of detailed design for this scheme.

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
Key users of the department or service	Residents, schools, businesses, commuters, visitors.
Key stakeholders were/are involved in this policy/decision/business plan	<ul style="list-style-type: none"> • Team London Bridge • Living Bankside • Arch Co • TfL • Local businesses • Schools • Southwark Cyclists • TRAs • Ward Councillors • LBS internal teams (Regen, Licensing, Housing, Parking, Waste, Maintenance, Parks, Streetlighting)

Section 4: Pre-implementation equality impact and needs analysis.

This section considers the potential impacts (positive and negative) on groups with protected characteristics, the equality information on which this analysis is based and any mitigating actions to be taken, including improvement actions to promote equality and tackle inequalities. An equality analysis presents an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

The columns include societal issues (discrimination, exclusion, needs etc.) and socio-economic issues (levels of poverty, employment, income). As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that socio-economic issues are given special consideration, as it is the council's intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantage.

Socio-economic disadvantage may arise from a range of factors, including:

- poverty
- health
- education
- limited social mobility
- housing
- a lack of expectations
- discrimination
- multiple disadvantage

The public sector equality duty (PSED) requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

1. Eliminating discrimination, harassment and victimisation
2. Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of under represented groups
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future For All values: that we will

- Always work to make Southwark more equal and just
- Stand against all forms of discrimination and racism

1) Demographic data for the affected wards

Consideration has been given to how the proposed change will affect those members of the wider community who share one of the protected characteristics.

The demographic data used in this report comes primarily from the Office for National Statistics Census 2021 as well as some additional sources.

The proposed scheme is within both South Bermondsey and London Bridge and West Bermondsey wards, so census and other data has been presented for both wards, where possible. The census recorded populations are given below:

Area	Population		Change over a decade	
	2011 Mid-year estimate	2021 Census	Number	Percentage
London Bridge & West Bermondsey	13,320	15,100	1,780	13%
South Bermondsey	15,330	15,950	620	4%
Southwark	288,720	307,620	18,900	7%

2) Age – Area Profile

This can refer to people of a specific age, e.g. 18 year olds, or an age range, e.g. 0-18 year olds.

Area	Population by Age		
	Under 20	20 to 64	65 and over
London Bridge & West Bermondsey	2,400 (16%)	11,700 (77%)	1,000 (7%)
South Bermondsey	3,300 (15%)	11,400 (71%)	1,300 (8%)

The proportion of the population made up by younger adults aged 20 to 39 is substantially higher than seen across Southwark as a whole.

Conversely, there is a substantially lower proportion of the population of the affected wards made up by children aged under 15, when compared to Southwark as a whole.

According to TfL's report, [Travel in London, \(TfL, 2022\)](#) Southwark has one of the lowest proportions of older residents across all the London boroughs (8%).

TfL's Travel in London Report found that the 17-24 and 45-64 age groups were well represented in cycling across London, with the over 65s being one of the most underrepresented groups. The travel behaviour statistics taken from this report for age are summarised below:

Older People

- Walking is the most frequently used type of transport by older Londoners aged 65 and over (87% walk at least once a week).

- Buses are the next most common type of transport used by older Londoners; 65% of Londoners aged 65 or over take the bus at least once a week.
- Among Londoners aged 65-69, 54% drive a car at least once a week, which is higher than Londoners overall (38%). Londoners aged 80 or over are considerably less likely to drive a car, and only 25% drive every week.
- Older Londoners are less likely to walk at least once a week than all Londoners (87% of Londoners aged 65 or over walk once a week compared with 95% of all Londoners).
- Bus use at least once a week among Londoners aged 65 and over is 65%, higher than the proportion for all Londoners (59%).
- Household access to a car reduces with age; 61 per cent of Londoners aged 65 and over have a car in their household compared with 65 per cent across all Londoners.
- There are an estimated 26,000 carers in Southwark. It is expected that many of these carers are reliant on vehicular transport to assist with their duties, however additional services such as TfL Freedom Pass, Dial-a Ride, Taxicard scheme, and Capital Call and Motability can help to reduce reliance on carers. See [Southwarks Carers](#) webpage for further advice and contacts of groups and charities that can help.

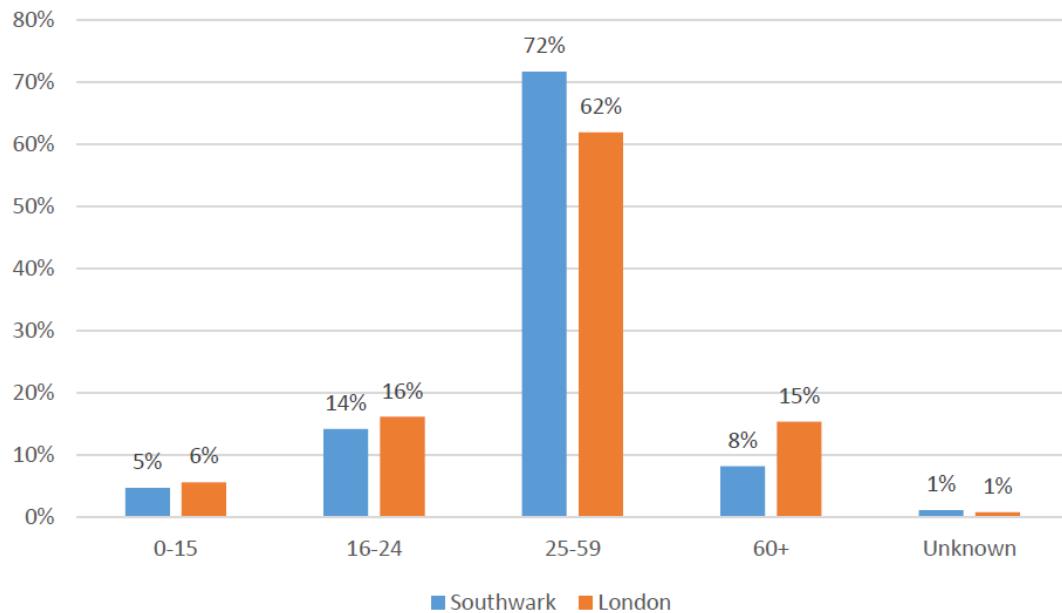
Younger People

- Walking is the most commonly used type of transport for younger Londoners, with 97 per cent aged 24 and under walking at least once a week.
- The bus is the next most commonly used transport type for younger Londoners. Among Londoners aged 11-15, 75% use the bus at least once a week, compared with 59 per cent of all Londoners.
- 47% of journeys made by Londoners under the age of 25 are for education compared with 20% for Londoners overall.
- Travelling by car as a passenger continues to decrease as younger Londoners achieve greater independence. Around three-quarters of under-16s (74%) travel by car as a passenger each week compared with 48% of those aged 16 to 24.
- Younger Londoners are more likely to walk almost every day (five or more days a week) with 90% of Londoners aged under 25 stating this compared with 84% of all Londoners.
- Regular bus use is common among younger Londoners. 76% of Londoners under 25 years old use the bus at least once a week and 42% use the bus almost every day (five or more times a week).
- The same proportion of younger Londoners (aged 16-24) as all Londoners sometimes cycle in London: 17 per cent of 16 to 24-year-olds sometimes use a bicycle to get around London. 13% of younger Londoners cycle regularly (at least once a week).
- A key barrier to younger Londoners cycling, particularly younger children, is the perceived safety of the cycling environment by parents. This remains a strong barrier, even when the parent perceives their child to be a skilful cyclist.
- The most common form of transport to and from school among Londoners aged under 16 continues to be walking. 45% of school journeys are made on foot.

Data for those who were killed or seriously injured by age in the borough for 2022 shows that for younger age groups (under 24) it is slightly below the average for London as a

whole, but for those between 25 and 59 this group is overrepresented for Southwark when compared to London as a whole.

KSI by age as a % in Southwark and London (2022)



(4 TfL Road Danger Reduction Dashboard, Road Safety Data Reports)

Age and Air quality

Air pollution in London is largely caused by road traffic, as well as domestic and commercial heating systems ([Health and Exposure to Pollution, 2023, London City Hall](#)).

Studies have shown that people who are of young and old age are more vulnerable to poor air quality ([New review shows harmful health impacts of pollution before birth through to old age, 2023, London City Hall](#)) and see also Fuller, G et al., Environmental Research Group, 'Imperial College London, 2023, [Impacts of air pollution across the life course – evidence highlight note](#)'.

Children and young people are particularly vulnerable to air pollution as their respiratory systems are still developing. Similarly, older and/ or disabled people with respiratory illnesses will also benefit from schemes promoting walking and cycling.

Young people are particularly vulnerable to the effects of air pollution. Long-term exposure to negative air quality can lead to reduced lung development, asthma, developmental problems and more wheezing and coughs in younger people.

Older people are particularly vulnerable to the adverse effects of air pollution, partly because they are more likely to have multiple long-term conditions occurring at the same time. Exposure to air pollution is also associated with accelerated cognitive decline in older people and the increased risk of stroke.

Age and Health

Children who are overweight or obese are likely to remain such in later life. The National Child Measurement Programme covers children in Reception (aged 4-5) and Year 6 (age 10-11). This data is broken down into underweight, healthy weight, overweight and obese children.

Data for Southwark shows that children in Reception who are overweight or living with obesity is just above the national average at 23.4% (22.3% in England), although the percentage of children in year 6 who are overweight or living with obesity is 42.8%, significantly above the average for England (37.8%) – [\(NHS National Child Measurement Programme – England, 2021/22\)](#)

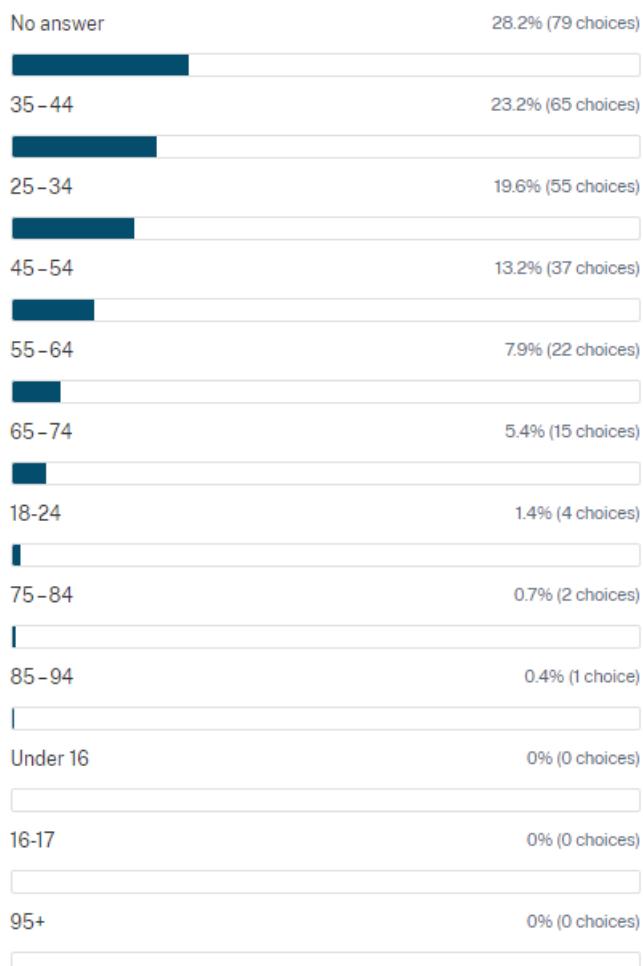
The Centre for London found a relatively strong correlation between weight problems, inactivity and low levels of walking and cycling. They also found a clear link between obesity and socioeconomic factors (Centre for London, 'Fair Access: Towards a transport system for everyone' Barrett et al., 2019).

Age consultation responses

There were 280 responses to the 'age' question in the consultation. Respondents were asked which age band they were in (as an optional multiple choice question). Of those that responded, the majority of respondents were between 35 and 44 (23%).

15. Age

201/280 - Multiple choice - choose one - optional



This can be compared to the resident population estimates percentage from the Census 2021 in the table below:

Area	Aged 14 years and under	Aged 15 to 24 years	Aged 25 to 34 years	Aged 35 to 44 years	Aged 35 to 44 years	Aged 55 to 64 years	Aged 65 to 74 years	Aged 75 years and over
London Bridge & West Bermondsey	14.6%	17.9%	22.9%	14.6%	12.4%	9.7 %	4.3%	3.6%
South Bermondsey	16.3%	14.1%	23%	16.7%	12.4%	9.6 %	4.5 %	3.3%

Evidence has been provided for why different age groups may be particularly affected.

Below is appraisal of the impact of the proposed changes on affected age groups.

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential Socio-Economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
<p>Positive Impacts:</p> <ul style="list-style-type: none"> • New footway on Druid Street • Reduced traffic on Gedling Place • Wider footway on Grange Road • Cycle infrastructure that is suitable for all ages <p>Negative impacts:</p> <ul style="list-style-type: none"> • It is possible that there may initially be some confusion caused by the changes in segregation along this section. • Removal of parking has the potential to disproportionately negatively affect older people as well as their visitors and any carers as car dependency is higher for this group who may be unable to participate in active travel or use public transport. • Areas of shared space may lead to potential conflict between cyclists and pedestrians. 	None
Equality information on which above analysis is based.	Socio-Economic data on which above analysis is based
See section 2 above.	

Mitigating and/or improvement actions to be taken

- Ensure adequate consultation, clear signage and wayfinding
- Tie in with LBS Community influencers scheme. These influencers are beginners to cycling who can inspire others in their community to try out riding a bike. Ambassadors such as these would be useful in the promotion of the new infrastructure to encourage others, such as those travelling to school, to try it.
- Where parking is removed the double yellow lines have relaxed restrictions for blue badge holders (up to 3 hours parking permitted).
- There is no detrimental impact to Emergency Services – they will have access through the closure and can stop anywhere as before. However consultation and engagement will take place with all emergency services throughout the design stages.
- The areas of shared space are being reviewed to see if separate cycle / pedestrian facilities can be provided instead. We will amend the design during the detailed design stage in recognition of the negative responses in the consultation and potential accessibility issues of shared space.

3) Disability – Area Profile

In 2021, according to the census, over 42,000 (14%) Southwark residents were disabled based on definitions used in the Equality Act (2010). This is similar to the proportion across London, but lower than England (20%).

South Bermondsey ward ranks third highest in Southwark for the proportion of residents with a disability, with around 2,500 people (15%) who are disabled according to the Equality Act (2010).

London Bridge & West Bermondsey wards have some of the lowest proportions of disability seen in Southwark, with around 12% of residents having a disability.

It is important to distinguish between the different types of disability and the different needs which need to be considered when planning cycling and walking infrastructure on the highway; from neurodiversity to mobility and visual impairments. As part of the design process the proposals have undergone an accessibility review by Wheels for Wellbeing, a local disability access charity, who walked and wheeled the route (in a wheelchair and adapted cycle) with Council Officers to ensure the design was as inclusive as it could be. As well as the joint site visit a technical appraisal was provided and reviewed in conjunction with the design team. The recommendations were incorporated into the design to make improvements so it is more inclusive for all impairments, not just mobility.

Southwark Council also commissioned an Accessibility Review Panel hosted by Centre for Accessible Environments (CAE) to look at aspects of Southwark's Streetscape Design Manual (SSDM) and what highways standard details could be improved. The outcomes of the review have also had a large influence on the design.

Below graphic shows the range of different impairment types for those with a disability across Southwark. Mobility is listed as the impairment type which affects most disabled people in the borough.

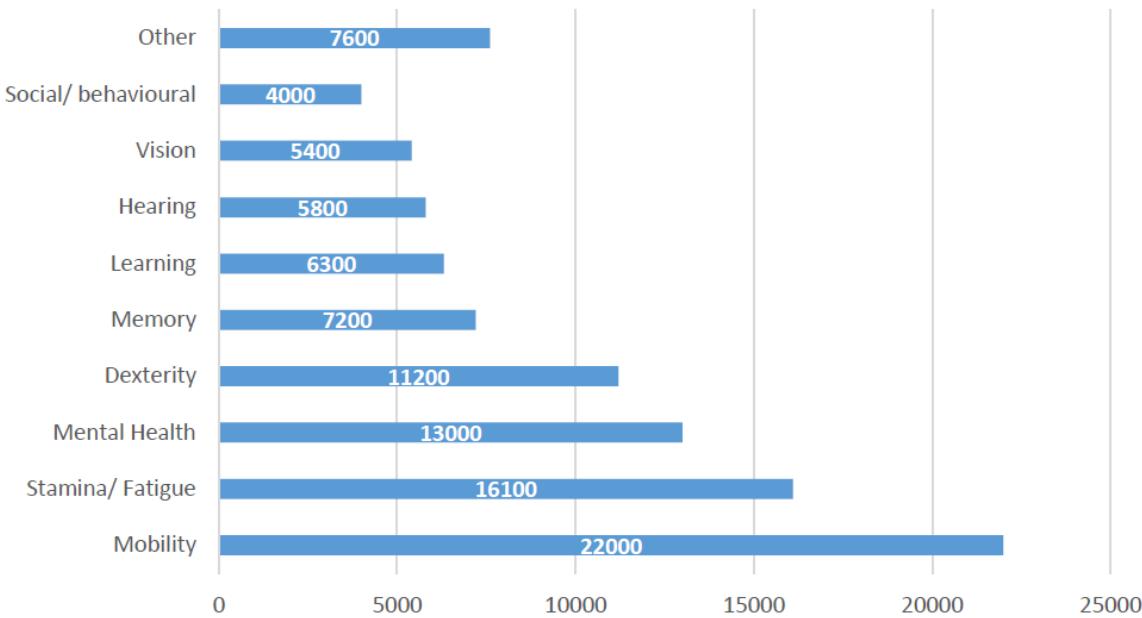


Figure 4-5: Prevalence of key impairment types for those with a disability in Southwark, 2019/2020¹⁰.

This dataset comes from the Family Resources Survey (Southwark JSNA Annual Report, 2022).

In other literature Wheels for Wellbeing had an annual survey which focuses solely on cyclists who have a disability and found that the majority (64%) of respondents reported that cycling was easier than walking and a similar number (59%) considered their cycle a mobility aid. The survey results also showed that 33 per cent of disabled cyclists use a bike for work or to commute to work and many found that cycling improves their mental and physical health. Inaccessible cycle infrastructure was found to be the biggest barrier to cycling. [Wheels for Wellbeing Annual Survey \(2021\)](#)

The majority of respondents to the survey indicated that they had experienced difficulties in accessing cycling, with individual freedoms being severely restricted as a result. Most significantly, the following barriers were identified as the most pressing ones:

- Inaccessible cycling infrastructure
- The prohibitive cost of adaptive cycles (and lack of local inclusive cycling opportunities)
- The absence of legal recognition of the fact that cycles are mobility aids for many Disabled people (on a par with wheelchairs or mobility scooters)

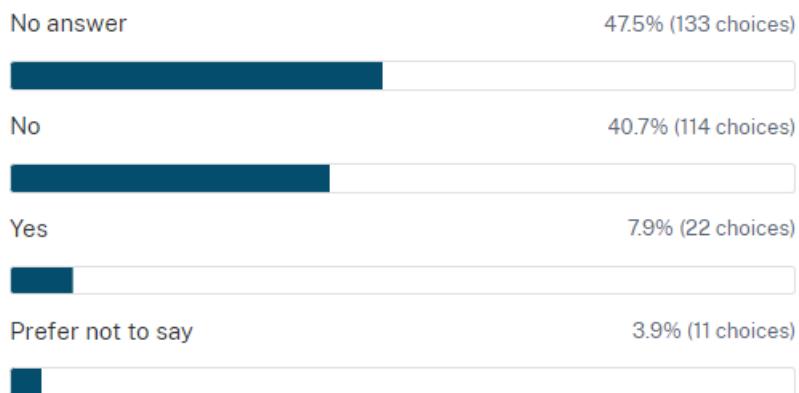
Some disabled persons find it easier to cycle than to walk so it must be ensured that this proposed cycle route is accessible to all, especially those using adapted cycles. Improved and new cycle infrastructure will benefit disabled cyclists and could potentially encourage people with disabilities to try cycling if their disability allows. Some disabled persons with physical /mobility impairments rely upon cycling as their primary means of mobility (however it very much depends on the type and severity of mobility impairment or type of disability).

However again caution must be used to recognise that different types of disability have very different specific requirements and this affects accessibility. Not all those with accessibility impairments are able to use an adapted cycle to get around.

From the consultation results only 8% of respondents considered themselves to have a disability (although answering this question was optional and 48% declined to answer, with also 4% preferring not to say if they had a disability).

18. Are you disabled?

147/280 -Multiple choice -choose one -optional



There was then also a follow up question in our online survey.

19. Please tick the box or boxes below that best describe your disability:

38/280 -Multiple choice -choose many -optional



Disability - A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Please note that under the PSED due regard includes:

Giving due consideration in all relevant areas to "the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities." This also includes the need to understand and focus on different needs/impacts arising from different disabilities.

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
<p>Positive Impacts:</p> <ul style="list-style-type: none"> Cycling can be easier than walking for some people with disabilities depending on their specific disability but particularly for some mobility issues, and so the reduction of traffic and better quality cycle infrastructure delivered by this scheme has the potential to encourage walking and cycling, particularly for this group. However as mentioned before it is important to distinguish between different disabilities. Not all disabled people can cycle or use adapted cycles for disabled people. However the street environment is improved elsewhere in the scheme for pedestrians with more frequent and upgraded crossing points and resurfacing of footways. This is a positive impact for disabled persons who don't or can't cycle. The proposals include improving the pedestrian environment – E.g. ensuring that footways are smooth, level, free from clutter, have appropriate tactile paving, paving, crossfall and gradient with also safer, more convenient crossing points raised to carriageway level. <p>Negative impacts:</p> <ul style="list-style-type: none"> It is possible that there may initially be some confusion caused by the changes to the streetscape especially where shared use is proposed. Removal of parking has the potential to disproportionately negatively affect older people as well as their visitors and any carers as car dependency is higher for this group who may be unable to participate in active travel or use public transport. 	<p>Improvements to the streetspace to make it more inclusive and easier to be used by persons with a disability will have a positive socio-economic impact by reducing reliance on public transport and taxis.</p>

Equality information on which above analysis is based	Socio-economic data on which above analysis is based
See Paragraph (3) above	
Mitigating and/or improvement actions to be taken	
<ul style="list-style-type: none"> Engagement with local residents and with local organisations representing those with disabilities, for example the Southwark Disabled People's Action Forum. Ensure adequate consultation, clear signage and wayfinding No disabled bays have been removed. Where parking is removed the double yellow lines have relaxed restrictions for blue badge holders (up to 3 hours parking permitted). There is no detrimental impact to Emergency Services – they will have access through the closure and can stop anywhere as before. Ensure design complies with BS 8300 for Inclusive Design i.e. Correct tactile paving, gradients, materials etc The areas of shared space are being reviewed to see if separate cycle / pedestrian facilities can be provided instead. We will amend the design during the detailed design stage in recognition of the negative responses in the consultation and potential accessibility issues of shared space. 	

4) Gender Reassignment – Area Profile

According to the census in 2021, Southwark gender reassignment responses were:

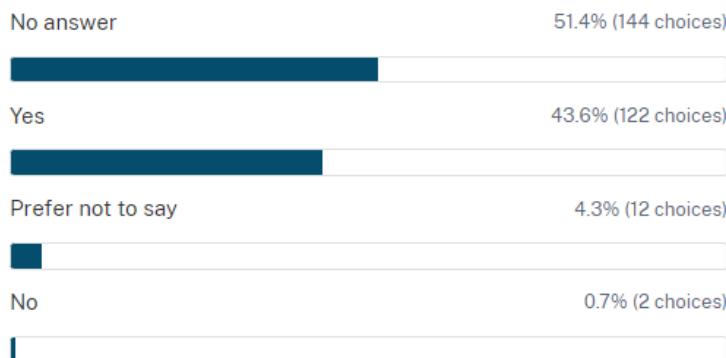
- Gender identity the same as their sex registered at birth 92.49 %.
- Gender identity different from their sex registered at birth 0.91 %.
- Not answer 6.60 %.

This only slightly varies from the national responses (93.5%, 0.5% & 6.0% respectively). In the survey responses for the Tanner Street to Willow Walk cycle route questionnaire there were a much higher proportion of respondents who either didn't answer, or preferred not to say. There were two respondents who indicated they have gone, or undergoing gender reassignment.

See results below:

23. Is the Gender you identify with the same as the sex you were recorded at birth?

136/280 -Multiple choice -choose one -optional



Gender reassignment:

- The process of transitioning from one gender to another.

Gender Identity: Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
There are no adverse effects which relate specifically to gender reassignment.	N/A
Equality information on which above analysis is based.	Socio-economic data on which above analysis is based
See paragraph (4) above.	
Mitigating and/or improvement actions to be taken	
None	

5) Marriage & Civil Partnership – Area Profile

People's marital or civil partnership status (Source Census 2021):

Marital Status	South Bermondsey	London Bridge & West Bermondsey
Married or in a registered civil partnership	27.3%	22.3%
Other marital or civil partnership status	72.2%	77.7%.

There was not a question in our Tanner Street to Willow Walk online survey regarding marriage or civil partnership because it was not considered relevant to the cycle scheme.

<p>Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)</p>	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
There are no adverse effects which relate specifically to marriage or civil partnership.	N/A
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
See Paragraph (5) above.	
Mitigating or improvement actions to be taken	
None	

6) Pregnancy & Maternity – Area Profile

Live births by ward, 2011 and 2021:

Area	Live births		Change 2011 to 2021		General fertility rate 2021
	2011	2021	Number	Percentage	
South Bermondsey	260	198	-62	-24%	45.7
London Bridge & West Bermondsey	189	167	-22	-12%	34.4
Southwark Borough	5252	3597	-1655	-32%	42.5

Live births by ward, 2011 and 2021 (Source Southwark Demographics 2023)

As you can see from the above data table the general fertility rate has decreased and there are less births per year now (as per census 2021) than in the previous census (2011). Since 2011, the number of live births to Southwark women has fallen by almost one-third (32%). Generally this downward trend is seen across England as a nation.

However the percentage reduction is markedly lower for South Bermondsey (-24%) and even less so for London Bridge & West Bermondsey (-12%) than compared to the rate in the rest of the borough and nationwide (-32%). South Bermondsey has the highest general fertility rate of all the wards in the borough.

According to Census 2021, The General Fertility Rate (GFR) in Southwark was 44 per 1,000 women aged 15-44, significantly lower than the average for London and England GFR. Therefore, there are likely to be less pregnant and maternal people who reside in Southwark than the national average.

Table 4.3: Birth and Fertility rates in Southwark, London and England¹³

Area	2021		
	Live births	General Fertility Rate ¹⁴ (GFR)	Total Fertility Rate (TFR) ¹⁵
Southwark	3,525	44	1.14
London	110,961	56	1.52
England	595,948	56	1.62

(Source: ONS, <https://data.london.gov.uk/dataset/births-and-fertility-rates-borough>)

Total fertility rates for Southwark have fallen year on year over at least the last decade. The average age of mothers having their first child in England and Wales rose to 30.9 years in 2021.

Pregnancy and maternity are relevant protected characteristics because our street environment should be safe and accessible for all, especially vulnerable citizens. For example women are more likely than men to be travelling with buggies and/or shopping, and this can affect transport choices. There are nurseries and schools near to the route.

Both expectant and post-natal mothers are protected against maternity discrimination. Mothers are protected for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.

Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and

	negative)
<p>Positive Impacts:</p> <ul style="list-style-type: none"> Maternal exposure to particulate matter (PM) during pregnancy is particularly harmful to children's health since this is a phase of rapid human growth and development. If the proposed cycling route leads to a shift away from using the private car in favour of active travel modes, then subsequent improvements in air quality are likely to disproportionately benefit infants and children who are more vulnerable to breathing in polluted air than adults due to their airways being in development, and their breathing being more rapid than adults. Better facilities for walking (new & wider footways) for women with buggies and/or small children <p>Negative Impacts:</p> <ul style="list-style-type: none"> It is possible that there may initially be some confusion caused by the changes to the streetscape especially where shared use is proposed. 	<p>Long term health of infants</p> <p>Encouraging active travel, health benefits, socio-economic benefits from less private car ownership</p>
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
See paragraph (6) above.	
<p>Mitigating and/or improvement actions to be taken</p> <ul style="list-style-type: none"> During both the consultation and monitoring and evaluation processes, it should be ensured that feedback is sought from people who are pregnant or young mothers as it is likely that their experiences will vary on a case-by-case basis. The areas of shared space are being reviewed to see if separate cycle / pedestrian facilities can be provided instead. We will amend the design during the detailed design stage in recognition of the negative responses in the consultation and potential accessibility issues of shared space. 	

7) Ethnicity – Area Profile

Ethnicity refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Southwark is ethnically and culturally diverse. This is particularly the case in those under the age of 20. Over 120 languages are spoken across the borough and one-fifth of Southwark residents have a main language other than English.

Just over half (51%) of Southwark's population is of White ethnicity; 25% Black, Black British, Caribbean or African; 10% Asian or Asian British; 7% Mixed or Multiple; and 6% from 'Other' ethnic backgrounds. That is 49% of Southwark residents are of non-White ethnicity. Diversity of ethnicity in South Bermondsey and London Bridge & West Bermondsey is lower than seen across Southwark and London, with 47% and 44% (respectively) of residents in these boroughs identifying with a non-White ethnic group.

Ethnicity	South Bermondsey	London Bridge & West Bermondsey
Asian or Asian British	9 %	12%
Black, Black British, Caribbean or African	24 %	18%
White	53 %	56%
Mixed or Multiple ethnic groups	7 %	8%
Other	7 %	6%

Source *Southwark Demographics 2023*

According to TfL's report on 'Understanding the Needs of London's Diverse Communities', Asian and minority ethnic Londoners are more likely to walk and use public transport than white Londoners.

Ethnicity – Travel Behaviour statistics

- Walking at least once a week is almost universal across all ethnic groups.
- Black Asian Minority Ethnic Londoners are more likely than white Londoners to use the bus, DLR or to travel as a car passenger at least once a week.
- The use of buses is particularly high among black Londoners, with 73 per cent using this type of transport at least once a week, compared with 65 per cent of all Black Asian Minority Ethnic Londoners and 56 per cent of white Londoners.
- Black Asian Minority Ethnic Londoners are more likely than white Londoners to walk (at least once a week) to get to/from work, school or college (60 per cent compared with 44 per cent), to visit friends and relatives (60 per cent compared with 49 percent) and to take a child to school (41 per cent compared with 27 per cent).
- Black Asian Minority Ethnic Londoners are less likely to hold a driving licence than white Londoners (54 per cent Black Asian Minority Ethnic aged 17 years or over compared with 71 per cent white). Asian Londoners and Mixed Londoners are slightly more likely than other Black Asian Minority Ethnic groups to hold a driving licence (57 per cent).
- Cycling levels among Black Asian Minority Ethnic Londoners and white Londoners remain very similar. Seventeen per cent of Black Asian Minority Ethnic Londoners cycle in the Capital at least sometimes, compared with 18 per cent of white Londoners.
- Even though Black Asian Minority Ethnic Londoners are less likely to be able to ride a bicycle, they are also more likely to be contemplating increasing their cycling frequency (13 per cent compared with nine per cent of white Londoners).
- Black Asian Minority Ethnic Londoners are again more likely than white Londoners to say they will definitely/probably use the Cycleways in the future: 30 per cent compared with

- 26 per cent (compared with 28 per cent and 21 per cent in November 2014).
- Black Asian Minority Ethnic Londoners are less likely than white Londoners to say that they feel safe from accidents when walking around London during the day.
- Black Asian Minority Ethnic Londoners are slightly less likely than white Londoners to say that they feel safe from accidents when cycling either during the day or at night. Sixteen per cent of white Londoners compared to 11 per cent of Black Asian Minority Ethnic Londoners consider themselves very safe from accidents when cycling during the day.

([Transport for London, Understanding the travel needs of London's diverse communities - BAME, April 2019](#)).

White people are overrepresented in cycling but there have been improvements in the representation of Asian, Arab, Mixed and other ethnic groups in more recent years (Travel in London, Report 15, TfL, 2022).

TfL's 'Cycling Potential in Diverse Communities' report found that there is great cycling potential in non-cyclists, who are Black, Asian and ethnic minority people as they are most open to cycling (as well as men and age group 16-34).

Road Safety

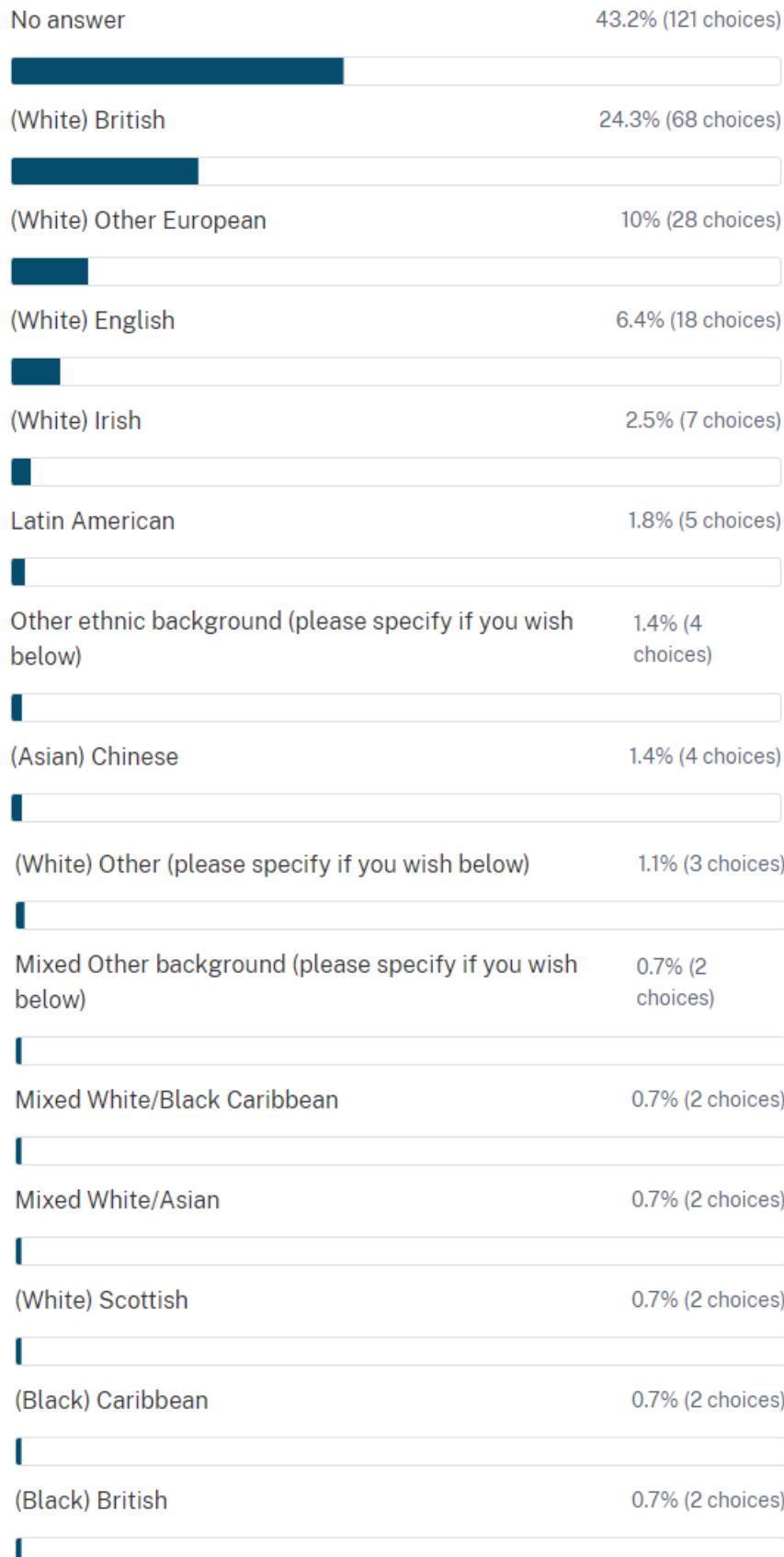
There is a strong causal link between road casualties and deprivation, as well as between ethnic group and deprivation. A study by Agilysis found that 51.7% of ethnic minority pedestrian casualties lived in the 25% most deprived communities. (Road Traffic and Injury Risk in Ethnic Minority Populations, 2021, Agilysis for London Living Streets, road-traffic-injury-risk-amongst-gb-black-and-ethnic-minority-populations.pdf ([livingstreets.org.uk](#))).

Black children in London are more at risk from pedestrian injury than White or Asian children, and Black Londoners are less likely to own cars than White or Asian Londoners (LTNs for all? Mapping the extent of London's new low traffic neighbourhoods Nov 2020, R. Aldred & E. Verlinghieri).

The responses to our consultation for the cycle route are shown overleaf; to summarise of those that answered this question 81% were White, 5% Asian, 4% Black, 4% Mixed and 3% Latin American. See below for further breakdown.

16. What is your ethnic background?

159/280 - Multiple choice -choose one -optional



(Asian) Other (please specify if you wish below)	0.7% (2 choices)
<input type="text"/>	
(White) Welsh	0.7% (2 choices)
<input type="text"/>	
(Black) Nigerian	0.4% (1 choice)
<input type="text"/>	
(White) Northern Irish	0.4% (1 choice)
<input type="text"/>	
(Black) Other African	0.4% (1 choice)
<input type="text"/>	
Mixed White Black African	0.4% (1 choice)
<input type="text"/>	
(Asian) Indian	0.4% (1 choice)
<input type="text"/>	
(Asian) British	0.4% (1 choice)
<input type="text"/>	
Gypsy, Roma or Irish Traveller	0% (0 choices)
<input type="text"/>	
(Black) Other (please specify if you wish below)	0% (0 choices)
<input type="text"/>	
(Black) Somali	0% (0 choices)
<input type="text"/>	
(Black) Sierra Leonean	0% (0 choices)
<input type="text"/>	
(Black) Ghanaian	0% (0 choices)
<input type="text"/>	
(Asian) Vietnamese	0% (0 choices)
<input type="text"/>	
(Asian) Pakistani	0% (0 choices)
<input type="text"/>	
(Asian) Filipino	0% (0 choices)
<input type="text"/>	
(Asian) Bengali	0% (0 choices)
<input type="text"/>	
Arab	0% (0 choices)
<input type="text"/>	

<p>Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>Positive:</p> <ul style="list-style-type: none"> • This scheme will improve conditions for those who walk and cycle, whether as a mode in itself or as part of a journey combined with public transport. As Black Asian and minority ethnic Londoners are more likely to walk and use public transport, they are more likely to benefit from any improvements to the walking environment brought by this scheme. 	<p>Encouraging active travel, health benefits, socio-economic benefits from less private car ownership</p>
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>
<p>Paragraph (7) above.</p>	
<p>Mitigating and/or improvement actions to be taken</p>	
<p>None</p>	

8) Religion – Area Profile

Over 40 distinct religions were identified among Southwark residents in the 2021 Census.

- A total of 133,300 Southwark residents reported their religion to be Christian, equivalent to 43% of the population. This proportion has decreased by ten percentage points over the decade (from 53%), representing a drop of 18,100 residents reporting Christian religion.
- ‘No religion’ was the second most common reported among Southwark residents, representing over one third (36%) of the population, substantially larger than across London (27%), but similar to the proportion nationally (37%).
- Over 29,600 Southwark residents reported their religion to be Muslim, making up a substantial proportion of the population at 10%.
- Those with Muslim or Hindu religion made up a notably smaller proportion of the population in Southwark than was seen across London.

See below for breakdown of religious beliefs in the affected wards:

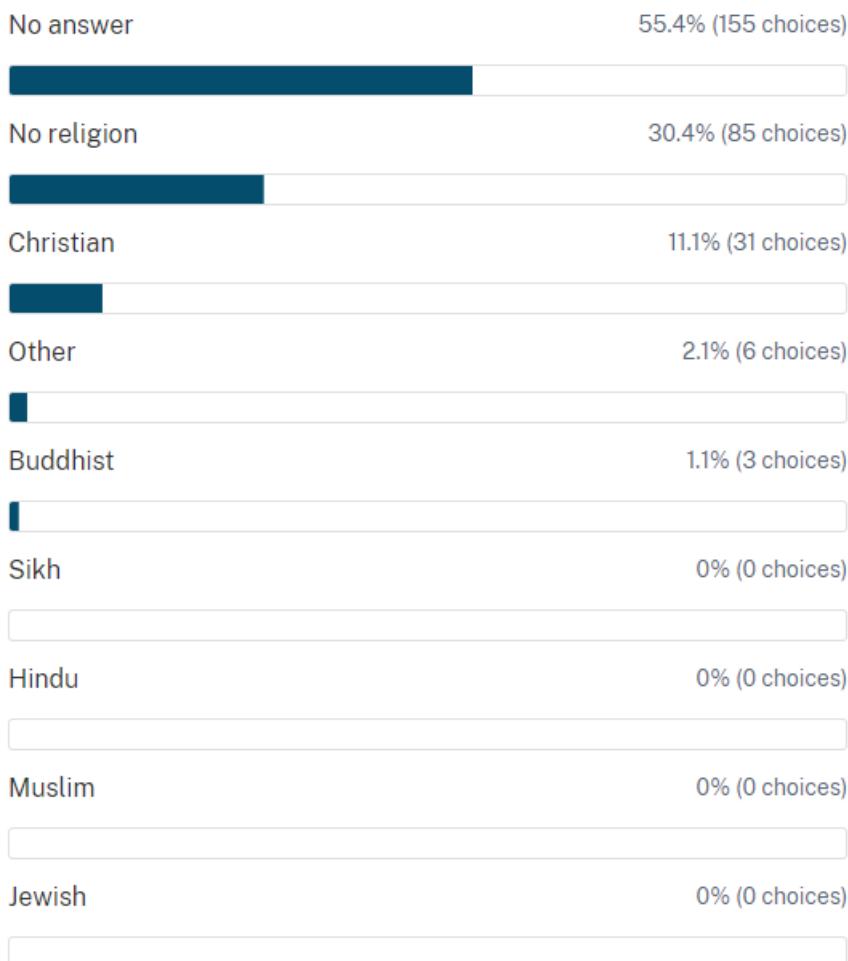
Religion	South Bermondsey	London Bridge & West Bermondsey
No religion	32.1 %	31.5%
Buddhist	0.7 %	0.9%
Christian	47.7 %	41.5%
Hindu	1.3 %	1.4%
Jewish	0.2 %	0.3%
Muslim	9.7 %	14.7%
Sikh	0.1 %	0.2%
Other religion	0.8 %	0.7%
Not answered	7.4 %	8.9%

Religion people connect or identify with in South Bermondsey Ward. Source Census 2021

Of those that answered this question in our consultation for Tanner Street to Willow Walk cycle route there was a strong majority for 'No religion'.

27. What is your religion or belief?

125/280-Multiple choice -choose one -optional



There is only one place of worship on or nearby which is affected by the proposed highway layout changes this is the Tibetan Buddhist Centre. They have been engaged from an early stage and hosted the early engagement drop-in session event in their library. There are a few churches within a 1km radius and these have been contacted to ensure that they, and their members, have the opportunity to have their say on the highway changes.

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
This scheme is unlikely to have a disproportionate/differential impact on the grounds of Religion and belief.	N/A
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
See paragraph (8) above.	
Mitigating and/or improvement actions to be taken	
None	

9) Sex – Area Profile

This section considers whether the proposed scheme will have a differential impact (positive or negative) on females or males.

According to 'Cycling Potential in London's Diverse Communities' (TfL, 2021) the challenges experienced that influence whether an individual can ride a bike, store a bike or even own a bike are most prominent among older women who also have low incomes and or disabilities.

Women may be more concerned than men about their own personal safety. TfL found that amongst those who had not cycled for the last 12 months, 73% of women were concerned for their personal safety and this was the primary barrier for them to cycling ([Cycling Potential in London's Diverse Communities, 2021, TfL](#)).

Sex – Travel Behaviour Statistics

- The three most common transport types used by women at least once a week are walking (95%), bus (63%) and car as a passenger (51%).
- Women are more likely than men to use the bus at least once a week (63% compared with 56%) and are less likely to travel by Tube at least once a week (38% of compared with 43%). Women are also less likely than men to cycle in London (13% compared with 22%).
- Women are less likely than men to drive at least once a week (33% compared with 42%).

- Women aged 17 or over who are living in London are less likely than men to have a full driving licence (58% compared with 72%) or have access to a car (63% of all women compared with 66% of all men).
- Women are more likely than men to be travelling with buggies and/or shopping, and this can affect transport choices.

([Transport for London, Understanding the travel needs of London's diverse communities - BAME, April 2019](#)).

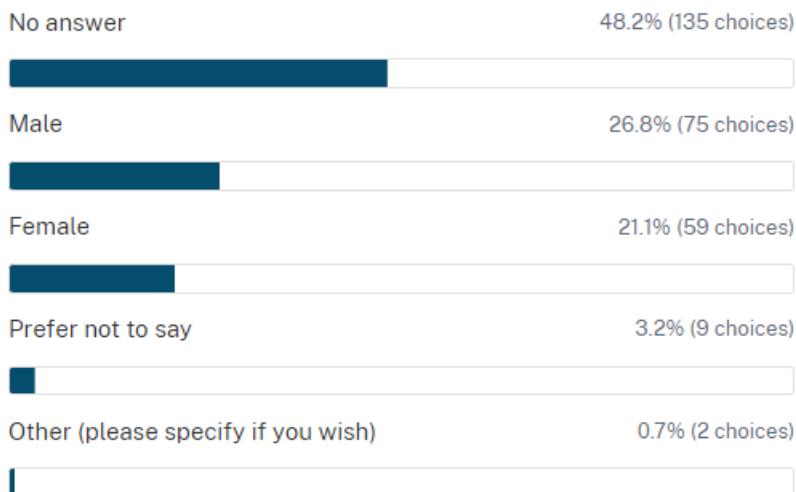
In the affected wards the division is as follows (Census 2021):

Area	Male	Female
South Bermondsey	48.4 %	51.6%
London Bridge & West Bermondsey	47.7 %	52.3%

In the cycle route consultation of those that responded to the question 'what is your sex recorded at birth', more responses were received by men (27%) than women (21%), with 3% preferred not to say, and 2 people stated 'Other'. However it was optional so only just over half of those responding to the online survey answered this question.

21. What is your sex as recorded at birth?

145/280 -Multiple choice -choose one -optional



Sex - A man or a woman.

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
<p>Positive impacts</p> <ul style="list-style-type: none"> • Women are more likely to rely on buses 	<ul style="list-style-type: none"> • None

<p>than men. These proposals help to support access to local public transport links by improving walking and cycling.</p> <ul style="list-style-type: none"> Women are more likely to undertake childcare and domestic responsibilities, especially more likely to accompany children to school and so are more likely to benefit from an improved and safer walking environment particularly on the 'school run'. Also improved junction safety will allow women with pushchair / buggy to walk safely and easily. TfL's 'Cycling Potential in London's Diverse Communities' report found that quiet streets and protected cycle routes are the most important factors to encourage cycling as they address safety concerns. Women may feel more encouraged and supported to take up or go back to cycling when a safer environment is created. <p><u>Negative impacts</u></p> <ul style="list-style-type: none"> None <p>(See disabled comments above for impact on older frail women with mobility problems; disabled women with mobility impairments, who rely on carers for transport.)</p>	
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
See Paragraph 9 above	
Mitigating and/or improvement actions to be taken	
N/A	

10) Sexual Orientation – Area Profile

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

See below responses to the sexual orientation question in the 2021 census for affected wards. This question was voluntary and was only asked of people aged 16 years and over.

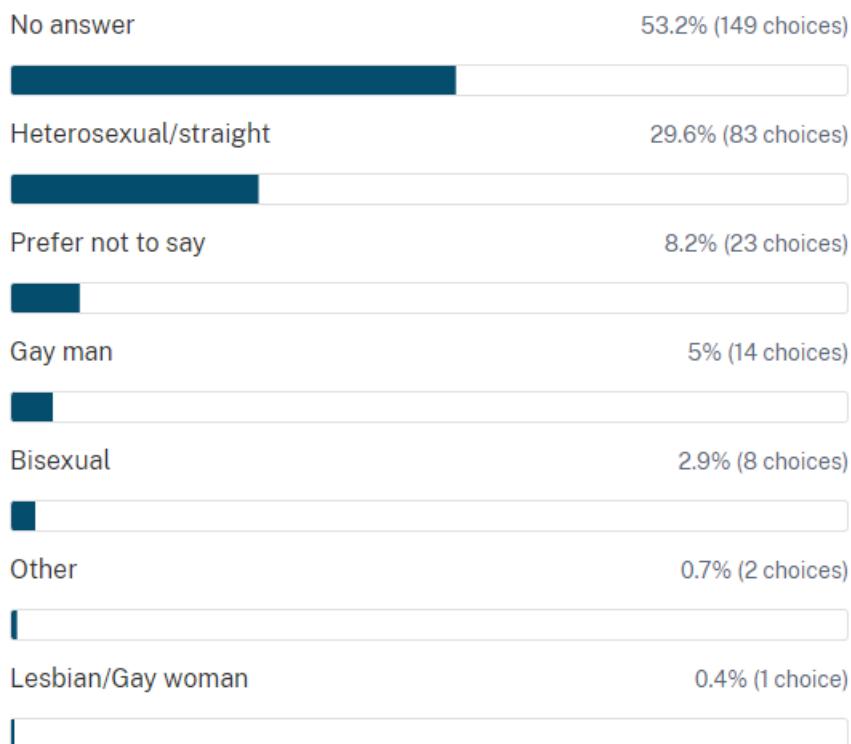
Area	Straight or heterosexual	Lesbian, gay, bisexual, or other (LGBQ+)	Not answered
South Bermondsey	84.12%	6.98%	8.90%
London Bridge & West Bermondsey	81.25%	8.31%	10.43%

In Southwark, more than 1 in 12 (8.1%; 20,700) residents reported an LGB+ sexual identity, around double the levels for London (4.3%) and England (3.2%). Southwark ranked 4th highest in England and 3rd highest in London. Seven of the top 10 local authorities were in London.

Of those who participated in our online survey less than half respondents answered this question. Of those that answered 63% described themselves as Heterosexual/straight and 18% described themselves as LGBTQ+ with 20% preferring not to say (this is the proportion of those that responded).

25. Which of the following best describes your sexual orientation?

131/280 - Multiple choice - choose one - optional



Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.

Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)

It is believed that no aspect of this scheme is likely to have a disproportionate/ differential impact on the grounds of sexual orientation.	N/A
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Paragraph (10) above.	
Mitigating and/or improvement actions to be taken	
None	

11) Socio-Economic Deprivation – Area Profile

Socio-economic factors that can disadvantage people can be for example unemployment, low income, low academic qualifications, or living in a deprived area, social housing or unstable housing, amongst others.

Although not a protected characteristic under the equality act, this presents as an opportunity for Southwark to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations.

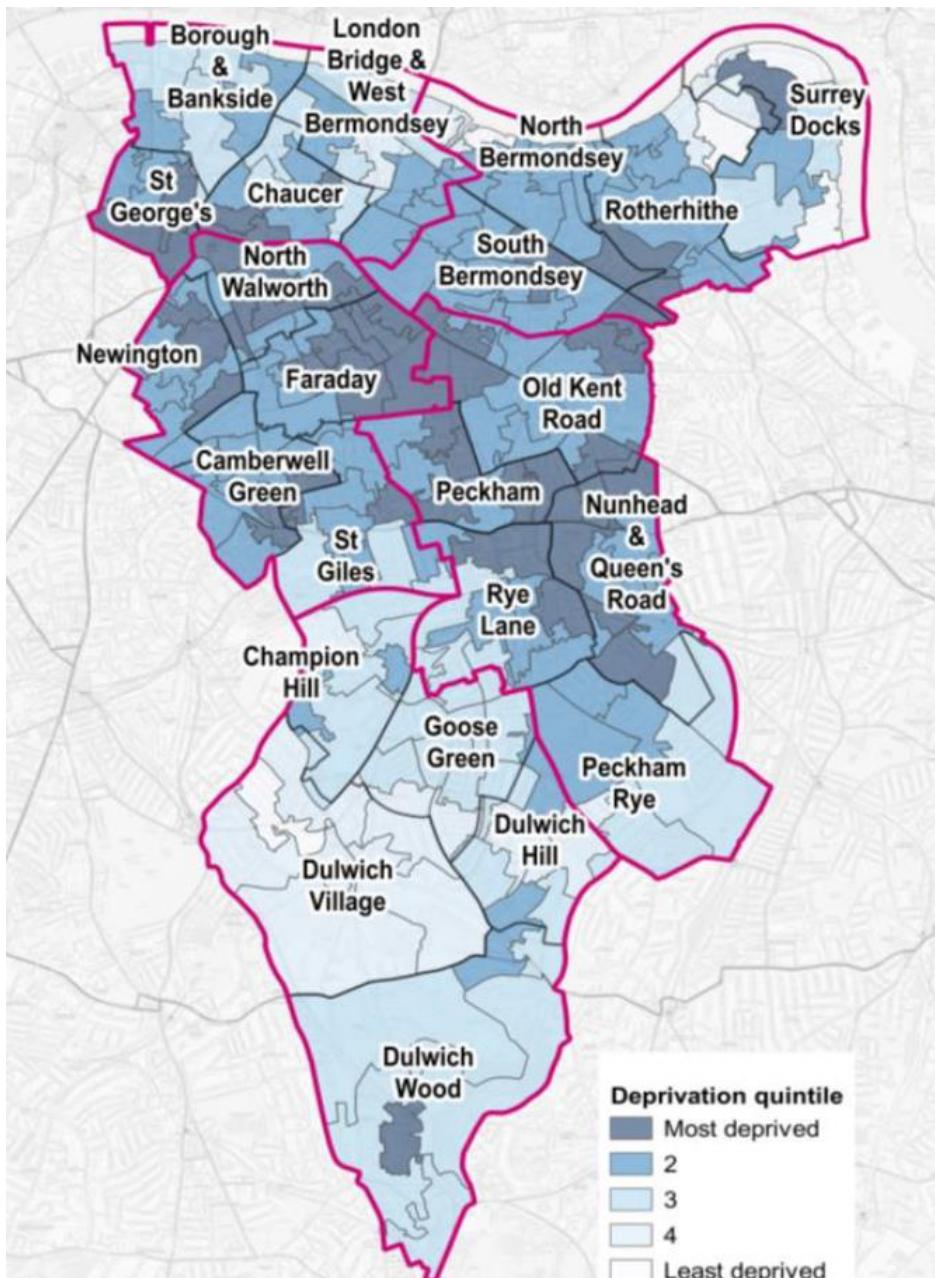
Southwark is one of the most deprived local authorities in the country.

The Indices of deprivation are based on income deprivation, employment deprivation, education, skills and training deprivation, health deprivation and disability, crime, barriers to housing and services and living environment deprivation. There is a key link between protected characteristics and socio-economic disadvantage.

Alongside skill and opportunity, cost can be another factor discouraging people from taking up cycling. Cycling will always be cheaper than driving. It can often be cheaper than public transport (although does generally require more upfront investment). According to the census 2021 only 32.6% own a car or van in the affected area.

Car ownership can be a choice, and is not necessarily an indicator of socio- economic status. For those households without access to a car, cycling infrastructure such as that proposed here is vital to aid movement and for an active travel alternative to public transport.

Below map shows the level of deprivation within the study area:



Ref: Department for Communities & Local Government. Indices of Deprivation, 2019.

According to research undertaken by Transport for London in 2019, "Travel in London: Understanding our diverse communities" the most commonly used form of transport for Londoners with lower household incomes (below £20,000) is walking. The bus is the next most commonly used form of transport with 69% of people with lower household incomes taking the bus at least once a week compared to 59% of all Londoners.

TfL also found that for those on a very low income, the cost of a bike may be a significant barrier to cycling.

Lower-incomes (socio-economic status) – Travel Behaviour statistics

- Women, disabled people, Black Asian Minority Ethnic Londoners and older people are more likely to live in low income households than other Londoners.

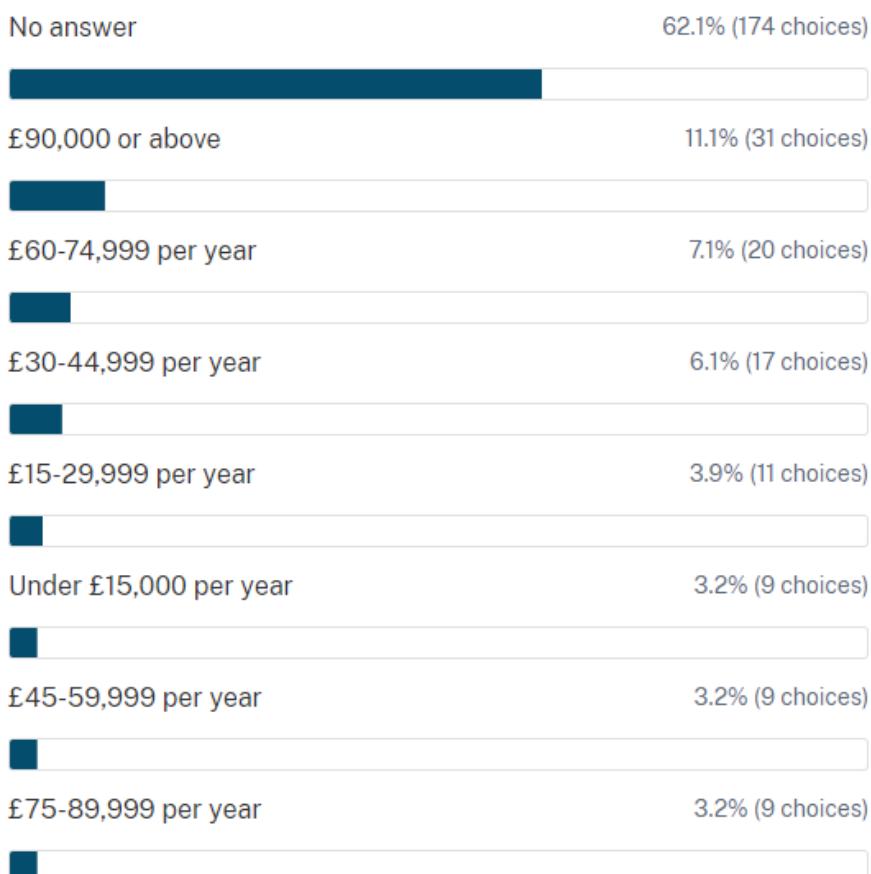
- The most common type of transport used by Londoners on lower incomes is walking (93% walk at least once a week) in line with all Londoners (95%)
- The bus is the next most common type of transport used by Londoners on lower incomes (69% use the bus at least once a week, compared to 59% of Londoners)
- Londoners with lower household incomes are less likely to use a car (both as a driver and passenger), train and Tube than all Londoners. This is most pronounced with driving a car (23% compared with 38% overall) and using the Tube at least once a week (32% compared with 41% overall)
- The proportion of Londoners with access to at least one car falls with decreasing household income
- Londoners in lower-income households are less likely to cycle. 8% sometimes used a bike to get around London in the past year compared with 17% of all Londoners

TfL's Travel in London Report found that across London, when looking at the incomes of those cycling, those with higher incomes are overrepresented and those on lower incomes are underrepresented.

Respondents to the Tanner Street to Willow Walk cycle route consultation tended to be from higher income brackets, however this question was optional and only 38% replied.

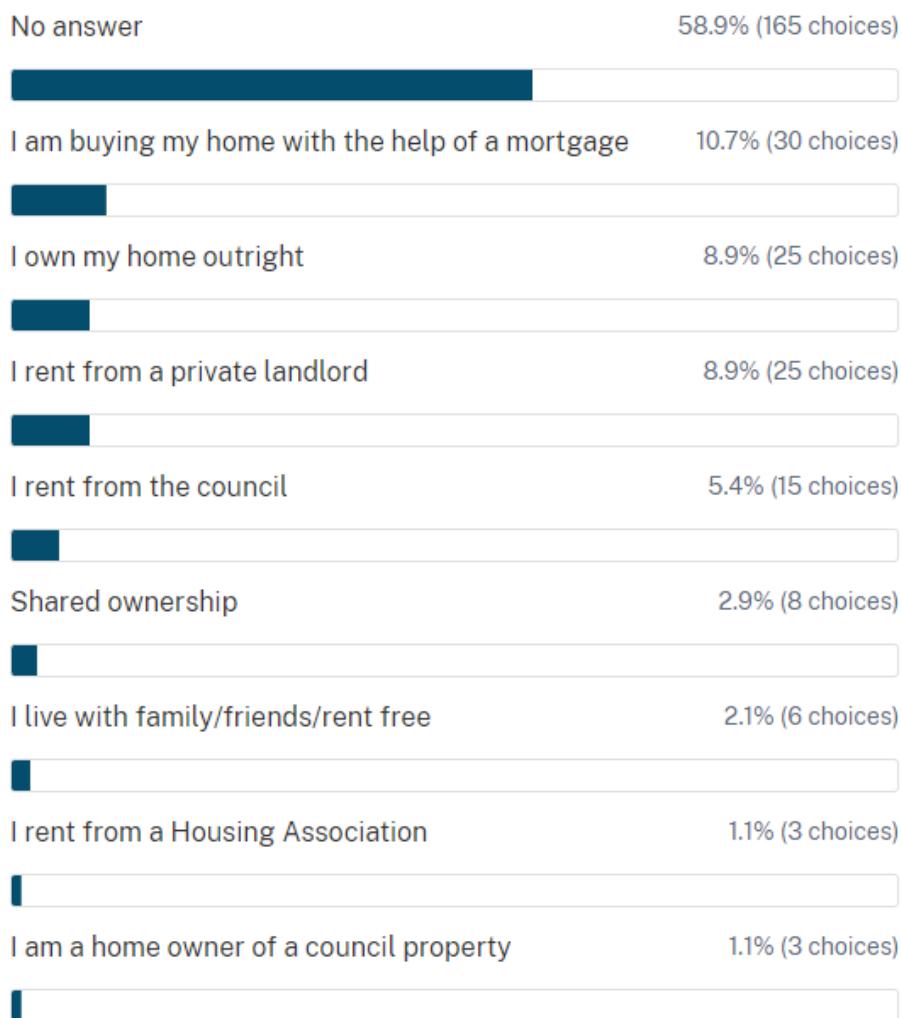
29. Approximately, what is your household income

106/280 - Multiple choice - choose one - optional



30. What is your current housing situation?

115/280 - Multiple choice - choose one - optional



Socio-economic deprivation- This refers to people who are disadvantaged due to socio-economic factors, e.g. unemployment, low income, low academic qualifications, or living in a deprived area, social housing or unstable housing. Although not a protected characteristic under the equality act, this presents as an opportunity for Southwark to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations.

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.

Positive impacts

- Cycling is a low cost form of transport and can connect people safely and quickly to local destinations, as well as to rail stations as part of multi-modal longer distance journeys (e.g. into Central London). The improvements to cycling conditions are likely to disproportionately benefit those without access to cars, providing they can afford the initial cost of a bike.

- People who are socio-economically disadvantaged are less likely to own a car and are more likely to use active modes like walking as well as public transport. The scheme is likely to benefit this group.

Negative impacts

- There will be a reduction in parking spaces caused by the scheme. As in many cases socio-economic deprivation is linked to other factors such as disability, old age, gender etc the reduction in parking may disproportionately affect those who rely on private cars for carers / caring, work or other means.

Equality information on which above analysis is based

See paragraph 11.

Mitigating and/or improvement actions to be taken

- Cycle training and Dr Bike (bike maintenance) to be made available free of charge to those residents on a low income.
- Southwark to promote opportunities to access affordable cycles, such as second-hand bike markets. This will reduce the up-front cost of purchasing a bike.
- Invest in 'bike libraries' in schools so children can borrow bikes and swap them for larger ones as they grow. This will support cycling to school, particularly for those from lower income families.
- In response to the removal of parking spaces the design is being reviewed and we have identified where more spaces are being provided, not just retained on Neckinger (which is most affected) but also on other streets in the surrounding Controlled Parking Zone. The parking surveys suggest that the stress is outside of the restricted parking times and so it is likely this is caused by visitors from outside the area parking near to Central London / London Bridge. The type of restriction can be amended from 'shared use' pay by phone bays to extend permit holders only hours. The timings can be extended to cover later in the evening and at the weekends.

Human Rights

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour , Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol

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

No Human Rights are affected by the proposed cycle lane.

Information on which above analysis is based
The potential impact of changes brought about by the cycle route was considered for each of the 16 Human Rights and none were perceived to be breached.
Mitigating and/or improvement actions to be taken
None

Conclusions

As a result of completing this Equality Impact and Needs Analysis, both positive and negative impacts have been highlighted across the protected characteristics. Section 5 below summarises the suggested mitigation and monitoring.

The response rates were not representative enough of the diversity of South Bermondsey and London Bridge & West Bermondsey ward profiles so to address this additional support from Southwark Council's Community and Involvement Team was provided for Faith Group contacts and the consultation was extended by a week and more engagement carried out. This was followed up with visits in person to community groups and organisations.

To provide more opportunity for engagement we further extended the consultation by another week and organised additional events. Council Officers undertook on-street surveys along the proposed route to ensure that we did our best to raise awareness and give everyone a chance to have a say.

The borough wide Streets for People consultation asked what could be done to improve the walking environment and analysed responses by ward. The top priorities chosen by residents were pavement improvements, green spaces, new trees, less traffic, improved lighting and pavement decluttering. This aligns with what is proposed to be delivered by the cycle route walking and cycling improvements.

Next Steps

It is recommended that the route is implemented, but with amendments to the design to address the minor negative impacts identified in this report. The time frame for implementation is as follows:

Task	Start	End
Outline Design Stage	Nov-23	May-24
Engagement & Consultation	Jul-24	Oct-24
Amendments to the Outline Design	Nov-24	Dec-24
Cabinet Member Decision	Jan-25	Feb-25
Detailed Design Stage	Mar-25	May-25
Early Contractor Involvement & Mobilisation	Jun-25	Sep-25
Construction	Oct-25	Dec-25
Monitoring	Jan-26	Jan-27

Section 5: Further equality actions and objectives

5. Further actions			
Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.			
Number	Description of issue	Action	Timeframe
1	Mobility issues (disabled or elderly)	Ensure adequate consultation, clear signage and wayfinding	Before (Design Stages)
2	Younger people take up of cycling (may not be confident or have access to bicycle)	Tie in with LBS Community influencers scheme. These influencers are beginners to cycling who can inspire others in their community to try out riding a bike. Ambassadors such as these would be useful in the promotion of the new infrastructure to encourage others, such as those travelling to school, to try it.	Before, during and after (follow up monitoring)
3	Removal of parking has the potential to disproportionately negatively affect older people as well as their visitors and any carers as car dependency is higher for this group who may be unable to participate in active travel or use public transport	No disabled bays have been removed. Where parking is removed the double yellow lines have relaxed restrictions for blue badge holders (up to 3 hours parking permitted). Parking stress surveys to be carried out to ensure affect on parking is manageable.	Before (Design Stages) & post implementation (monitoring)
4	Access for Emergency Services	Design to ensure there is no detrimental impact to Emergency Services – they will have access through the closure and can stop anywhere as before. However consultation and engagement will take place with all emergency services throughout the design stages.	Before (Design Stages) & post-implementation (feedback & changes if necessary)
5	It is possible that there may initially be some confusion caused by the changes to the streetscape especially	Ensure adequate consultation, clear signage and wayfinding. Engagement with local	Before (Design Stages)

	where shared use is proposed.	residents and with local organisations representing those with disabilities. Ensure design complies with BS 8300 for Inclusive Design i.e. Correct tactile paving, gradients, materials etc	
6	Impact on expecting or new mothers	Consultation feedback to be sought from people who are pregnant or young mothers (engagement with nearby schools, nurseries and in Spa gardens park)	Before (Design Stages) & post-implementation (feedback & changes if necessary)

Appendix

Organisations consulted:

- Wheels for Wellbeing
- Living Streets
- Centre for Accessible Environments
- Southwark Disabled People's Action Forum
- Transport For All
- Action for Blind People
- Guide Dogs
- Southwark Disablement Association
- OBAC - Organisation of Blind Africans & Caribbeans
- Link Age Southwark
- Southwark Pensioners
- Southwark Dementia Action Alliance
- Road Peace
- Key Ring

Item No. 7.	Classification: Open	Date: 5 February 2025	Meeting Name: Planning Committee
Report title:		Development Management	
Ward(s) or groups affected:		All	
From:		Proper Constitutional Officer	

RECOMMENDATIONS

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

BACKGROUND INFORMATION

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

Director of Law and Governance

- 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 Director of Law and Governance, 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 Director of Law and Governance. 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

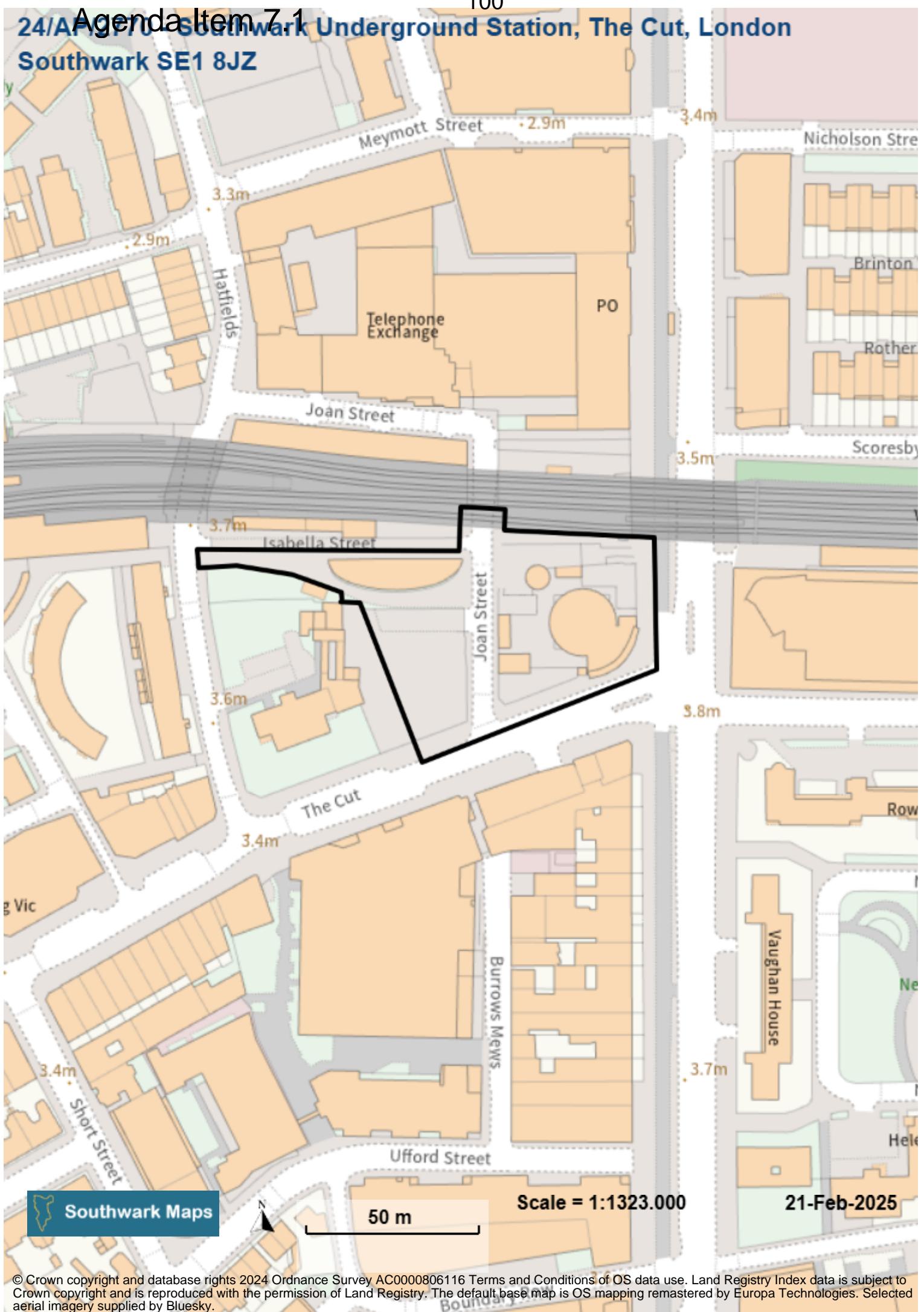
No.	Title
None	

AUDIT TRAIL

Lead Officer	Chidilim Agada, Head of Constitutional Services	
Report Author	Gregory Weaver, Constitutional Officer Nagla Stevens, Deputy Head of Law (Planning and Development)	
Version	Final	
Dated	5 June 2023	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments sought	Comments included
Assistant Chief Executive – Governance and Assurance	Yes	Yes
Director of Planning and Growth	No	No
Cabinet Member	No	No
Date final report sent to Constitutional Team	5 June 2022	

24/APR/2025 Southwark Underground Station, The Cut, London

Southwark SE1 8JZ



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Meeting Name:	Planning Committee (Major Applications) B
Date:	05 March 2025
Report title:	<p>Development Management planning application: Application 24/AP/2770 for: Full Planning Application</p> <p>Address: Southwark Underground Station, The Cut, London Southwark SE1 8JZ</p> <p>Proposal: Demolition and redevelopment to provide a purpose built student accommodation building of 15 storeys (plus basement and rooftop plant) with retail and/or café uses within Use Class E on the ground floor, and a residential building of 9 storeys (plus rooftop plant) to accommodate 44 affordable residential homes within Use Class C3, with community uses within Use Class F1 on the ground floor; together with cycle parking, refuse/recycling storage, servicing, improvements to Joan Street, landscaping and other works.</p>
Ward(s) or groups affected:	Borough and Bankside
Classification:	Open
Reason for lateness (if applicable):	Not Applicable
From:	Director of Planning and Growth
Application Start Date:	23/09/2024
Application Expiry Date:	23/12/2024
Earliest Decision Date:	23/12/2024

RECOMMENDATION

1. That planning permission be granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.
2. In the event that the requirements of paragraph 1 above are not met by 05/09/2025, the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 328.

EXECUTIVE SUMMARY

3. The Site is brownfield land comprising Southwark Underground Station and associated structures including the station entrance, canopy and 'eyelid'. The

majority of the Application Site is hard landscaping including parts of the site which formed part of the Styles House estate have been demolished as a part of the implementation an extant planning permission. That part of the site is currently hoarded off.

4. The permission on Styles House for the development 25 new council homes and a new community hall in a 14-storey block of flats was granted in 15.7.21 and formed part of the councils house building programme. The consent on the Southwark station site was granted on 22.6.22 for a 17 story office scheme which Transport for London (TfL) intended to build and occupy.
5. Whilst demolition of a community hall, garages and 8 studio flats has been completed on the Styles House site there is no longer funding available to build the 25 new council homes and replacement community hall. TfL post Covid no longer have a need for the consented office accommodation. This potentially means that neither site will come forward for the foreseeable future and critically the council homes and replacement community hall will not be delivered.
6. To avoid this outcome TfL have partnered with a developer and in discussion with officers have come forward with a scheme that would deliver 44 new council homes including much needed family homes (all at social rent which the council would own and manage) and a replacement community hall on the Styles House site with student housing above the Southwark Station site. The latter would in effect be funding the council housing at no cost to the council, with the developer constructing the council housing and the Payment In Lieu discussed in the main report being used to purchase it.
7. To deliver this planning permission is sought for construction of a 15 storey Purpose Built Student Accommodation (PBSA) Building above and around Southwark Underground Station and a 9 storey Residential Building to the west of Joan Street which would provide 226 sqm of community facilities, 123 sqm of retail/café use, 429 student rooms and 44 affordable homes. The proposal also includes supporting amenity elements such as public realm upgrades to Joan Street, play space and communal gardens as well as refuse and cycle facilities.
8. The 44 new affordable homes accounts for 150 affordable habitable rooms and equates to 25.9% of the total habitable rooms on both sites (579 rooms). In addition, to the provision of on-site affordable housing, the proposed development includes a S106 payment in lieu (PIL) of £15,685,000 towards off-site affordable housing. This is the equivalent to a further 157 affordable habitable rooms which is equivalent to a total affordable level of 52.8% of the proposed student accommodation. The application sites are publicly owned and would therefore need to deliver at least 50% affordable housing.
9. The Applicant has undertaken pre-application engagement with planning officers and with the Styles House TMO in order to facilitate a high-quality scheme comprising PBSA, affordable family homes, community facilities, retail uses with active frontages and various public realm works in accordance with the Southwark Local Plan Site Allocation NSP20. nd the wider public, suitably guiding the

SUMMARY TABLES

10.

Housing							
Homes	Private Homes	Private HR	Social Rent Homes	Social Rent HR	Shared Ownership Homes	Shared Ownership HR	Homes Total (% of total)
Studio	0	0	0	0	0	0	0
1 bed (2P)	0	0	15	30	0	0	34%
2 bed (3P)	0	0	13	39	0	0	30%
3 bed (4P)	0	0	15	75	0	0	34%
4 bed (5P)	0	0	1	6	0	0	2%
Total and (%) of total	0	0	44	150	0	0	100%

Direct Let Student Housing				
Small Studio	Medium Studio	Large Studio	Wheelchair Accessible M4(3)	Total
208	169	52	22 (included in total)	429

Land Use				
Use Class Description	Existing GIA	Proposed GIA	Change +/-	
Community Use (Class F1)	0	226 sqm	+226 sqm	
Retail/Café Use (Class E)	0	123 sqm	+123 sqm	
Commercial (Class E)	0	0	0	
Student Accommodation (PBSA)	0	16,112 sqm (429 rooms inc. all amenity and ancillary)	+16,112 sqm	
Residential Accommodation (Class C3)	0	5,349 sqm (44 units / 150 rooms inc. all ancillary)	+5,349 sqm	

Tenure Split on site				
Tenure	Number of Units	Number of Habitable Rooms	% (Habitable Room)	

Social Rent	44	150	25.9%
Intermediate	0	0	0%
Direct Let (Student)	429	429	74.1%

Tenure Split - including S106 Payment in Lieu (PIL)			
Tenure	Number of Units	Number of Habitable Rooms	% (Habitable Room)
Social Rent	44	150	25.9%
s106 (PIL) (£15.685m)	0	156 (equivalent)	26.9%
Intermediate	0	0	0%
Direct Let Student	429	429	74.1%
Total	473	579 (on-site)	25.9% affordable (on-site) 52.8% affordable (with s106 PIL)

Open Green Space			
	Existing Area	Proposed Area	Change +/-
Public Open Space	2,297 sqm	2,309 sqm	+12 sqm
Play Space	0	516.8* sqm	+516.8 sqm

Carbon Saving and Trees	
Criterion	Details
CO2 savings	39% CO2 / year
Trees Lost	None
Trees Gained	19

Greening, Drainage and Sustainable Transport Infrastructure			
Criterion	Existing	Proposed	Change +/-
Urban Greening Factor	0.0378	0.323	+0.245
Greenfield Run Off Rate	39.0 l/s (1 in 1 year) 119.1 l/s (1 in 30 year) 155.6 l/s (1 in 100 year)	22.9 l/s (1 in 1 year) 58.3 l/s (1 in 30 year) 77.1 l/s (1 in 100 year)	41% 51% 50%
Green Roof Coverage	0	585 sqm	+585 sqm
Electric Vehicle Charging Points	0	1	+1

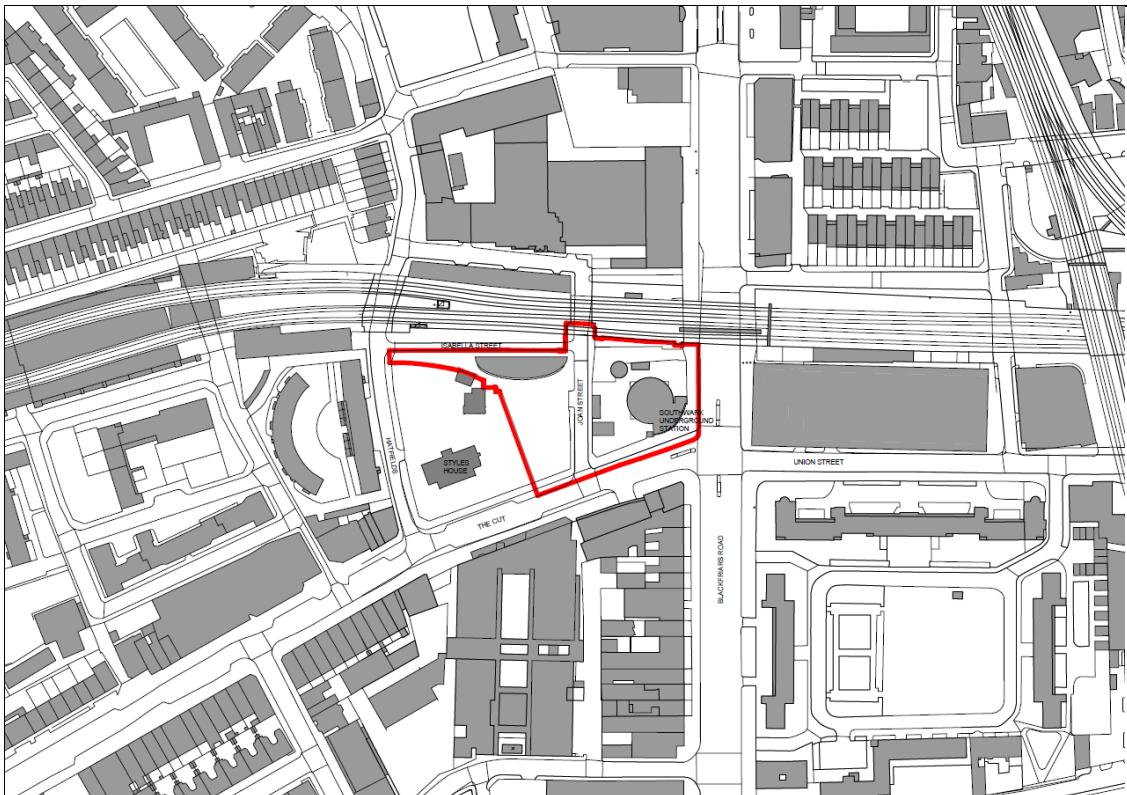
Cycle Parking (exc cycle hire)	0	429	+429
Cycle hire	23*	30	+7

CIL and Section 106	
Criterion	Total Contribution
CIL (estimated)	£ 5,570,324.21 (pre-relief) £ 3,565,020.67 (net of relief)
MCIL (estimated)	£ 1,182,828.32
S106 Contribution	£16,378,422

BACKGROUND INFORMATION

Site location and description

11. The application site is located on the junction of Blackfriars Road and The Cut with the railway viaduct into Waterloo immediately to the north. It straddles Joan St to the west, backing directly on to the Council housing estate and Styles House.



12. The site contains Southwark Underground station, which at street level comprises a single storey structure with its notable, curved portal entrance on the street corner that leads steeply down into the ticket hall station and concourse. The concourse is lit from above by a ground level rooflight, referred to as the 'Eyelid', which sits in an area of soft and hard landscaping on the west side of Joan Street. The landscaping is open to the general public and acts as

a pedestrian cut-through to Hatfields. The remainder of the site is hoarded, having previously contained a short, staggered terrace of low-rise social housing, a community centre and a workshop building that have been demolished to make way for a previously consented scheme on the site.

13. Initial ground preparation works and works to the single storey structure have been undertaken for the previously consented scheme, and as such the permission is extant. The development was for office-led mixed-use scheme. This comprised a tall office building that would have sat above the station, with its large commercial floorplates stretching rearward parallel with The Cut and viaduct, requiring the closure of Joan St. This would have been accompanied by a residential tower with a narrow floorplate, providing a replacement community hall at its base and replacement and increased number of affordable homes above.
14. The consented scheme is no longer being delivered and a revised approach to the development of the site is being taken. The current application follows a series of pre-application meetings and presentation to the Council's Design Review Panel (DRP).
15. The following policy designations are relevant to this site:
 - The Bankside, Borough and London Bridge Opportunity Area.
 - The Central Activities Zone.
 - The Bankside and Borough District town centre.
 - The Tall Buildings Area.
 - The Waterloo Quarter Business Improvement District.
 - The Southbank Strategic Cultural Quarter.
 - An Archaeological Priority Area.
 - NSP20: Southwark Station and 1 Joan Street
 - Flood Risk Zone 3
 - The area has a PTAL rating of 6b, indicating an excellent level of public transport accessibility.
 - A hot food takeaway exclusion zone.
16. The application site is allocated for redevelopment in accordance with NSP20 (Southwark Station and 1 Joan Street) of the Southwark Plan (2022). Site allocations set out land uses that *must* be provided as part of the redevelopment, in addition to other acceptable land uses that *should* be provided, alongside the required land uses. Site allocations are expected to achieve all the site requirements of both *must* and *should*.
17. The site requirements for NSP20 are as follows:

Redevelopment of the site must:

- *Provide at least 50% of the development as employment floorspace (E(g), B class)*
- *Provide active frontages with ground floor retail, community or leisure uses (as defined in the glossary) on Blackfriars Road, The Cut and railway viaduct*

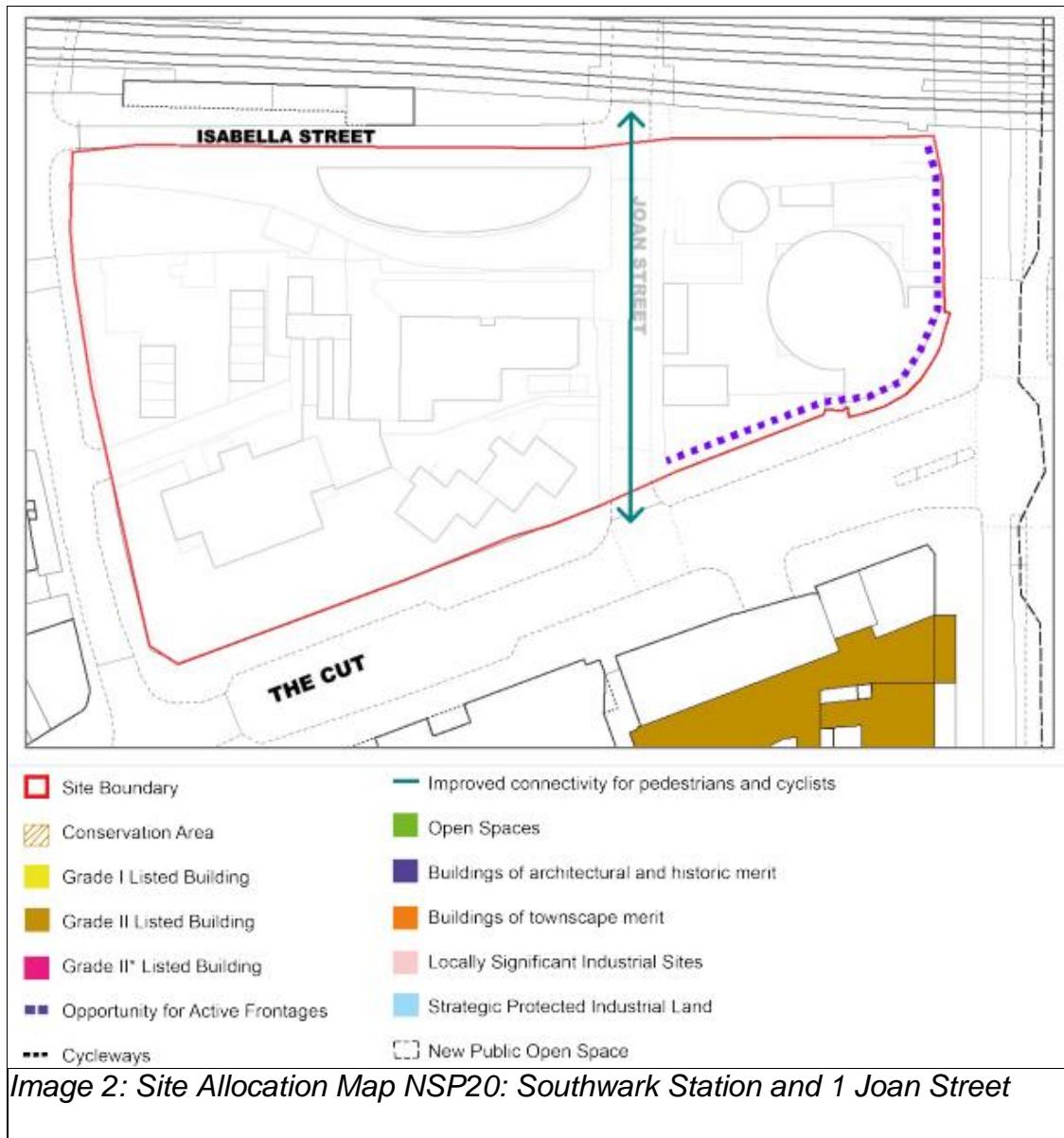
- Provide an enhanced accessible tube station, including public realm improvements.

Redevelopment of the site should:

- Provide new homes (C3) – indicative capacity 16 homes.

Redevelopment of the site may:

- Provide leisure, arts, culture or community uses.

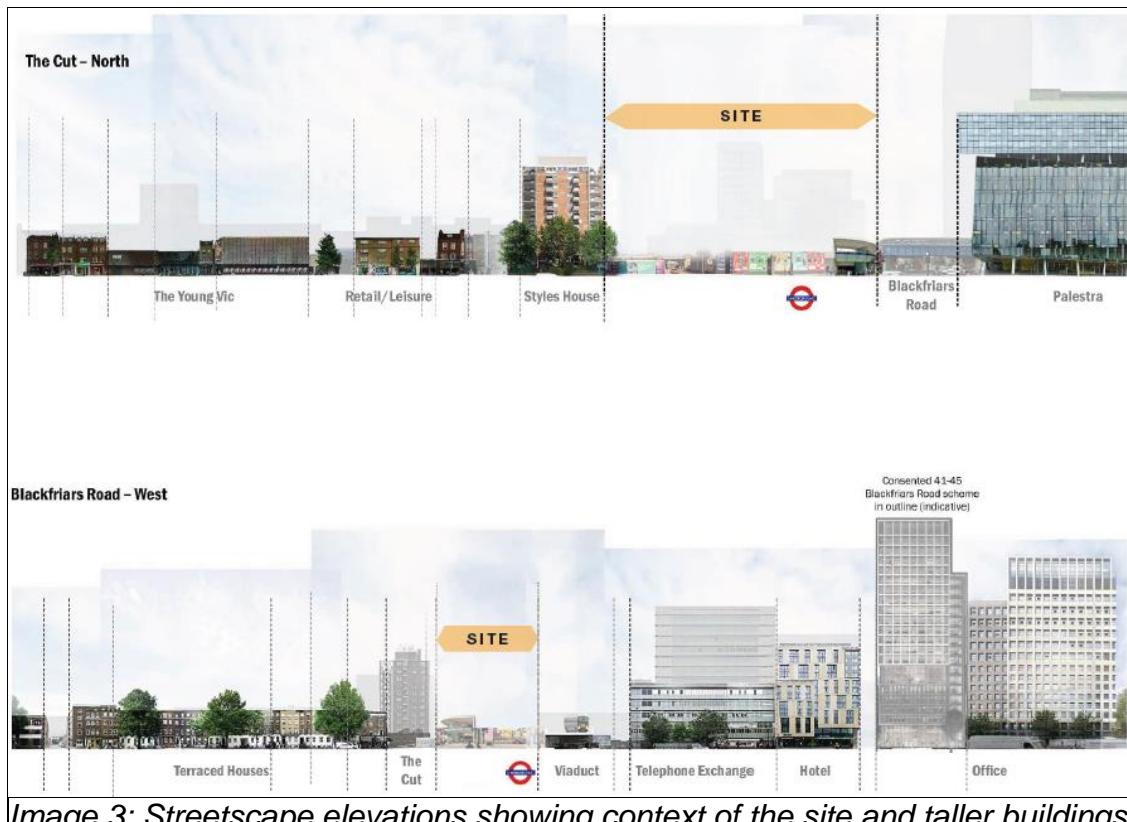


18. The allocation also states that the site can accommodate a substantial uplift in new employment space and potentially new homes and that redevelopment will improve the town centre offer at ground floor facing Blackfriars Road and The Cut.
19. The purpose of the site allocation is to ensure that when the site comes forward for redevelopment, it successfully integrates into its surrounding context and contributes to meeting a strategic need in the borough for new homes and

employment.

Surrounding Area

20. The surrounding area could be categorised as predominantly commercial and residential however the scale and massing within the area is mixed with several taller structures present in the townscape along Blackfriars Road and The Cut as highlighted in the image below.



21. To the north of the site, running parallel to Isabella Street, lies the railway viaduct to Waterloo East with arches beneath. Bars and restaurants occupy the arches west of Joan Street, whilst plant and equipment serving Southwark Station occupy those to the east. Beyond the railway arches lies Colombo House, a 12-storey office building.

22. The adjoining land to the west accommodates Styles House, which is a 12-storey residential flat building with associated landscaping and car parking. While the eastern boundary of the site is Blackfriars Road with Palestra apposite, which is a 10-storey office building with substantial plant floors above.

23. Closer to the site are the shops, services and leisure facilities located along The Cut to the South. These include Tesco, Sainsbury's, an extensive range of cafés, restaurants and pubs, Southwark College, the Young Vic, the Old Vic, various services such as hairdressers, barbers and dry cleaners, as well as a narrower range of shops. These uses lie along The Cut and are within buildings of predominantly three-five storeys.

24. The application site is situated in a sustainable and highly accessible location. The retained Southwark Underground Station lies within the site itself. Both Waterloo mainlines and underground stations, together with Waterloo East Station, are all within about a seven minute walk from the application site. Extensive bus services run along Blackfriars Road, providing quick links to the Southbank and both Holborn and the City on the other side of the Thames.
25. The site is not located within a conservation area but the following Grade II listed buildings are in close proximity to the site:
 - 1-18 Aquinas Street
 - Christ Church, 74, 75-78, 81-83 and 85-86, 176, and the Peabody Estate in Blackfriars Road
 - Clandon House and Albury House in the Boyfield Street Estate
 - 22, 23 and 25 Cornwall Road
 - Rochester House in Dolben Street
 - Drapers Almshouses in Glasshill Street
 - 15-17 Hatfields
 - 67 Hopton Street
 - Blackfriars settlement (44-47) Nelson Square
 - Former Clay's Printing Works, Paris Gardens
 - The Kings Arms Public House; St Andrew's House; St Andrew's and St John's CoE Primary School; 1-23, 43-61, 73, 26-42 and 62-72 Roupell Street
 - Rushworth Street Estate (Chadwick, Ripley, Merrow Buildings)
 - Royal National Theatre Studio (83-101) the Cut
 - 1-29 Theed Street, and
 - 5-21, 23, 37, 2-18 and 20-30 Whittlesey Street.

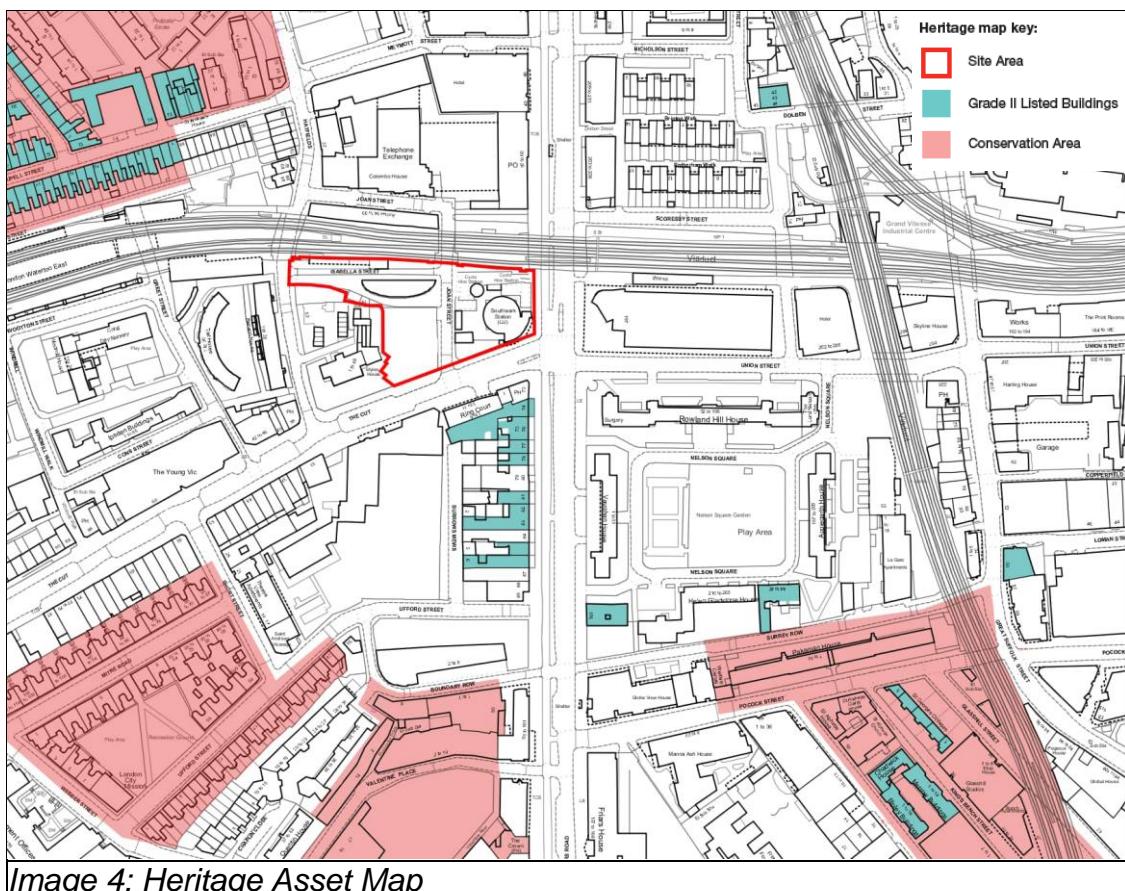


Image 4: Heritage Asset Map

Details of proposal

26. The proposal seeks demolition and construction of two buildings, 15 storeys and 9 storeys in height to provide 44 affordable residential homes, 429 purpose built student units, retail, café and community uses along with landscaping and public realm works.

Land Use

27. The purpose built student accommodation block is proposed to be built over the Southwark Underground Station and will be located on the corner of Blackfriars Road and The Cut. The block will comprise 15 storeys plus basement and rooftop plant and contain 429 student rooms as well as retail and/or café uses (Class E) in two units located on the ground floor, either side of the station entrance

28. The affordable residential block is proposed to be located on the western side of Joan Street at the intersection with The Cut. It will comprise 9 storeys plus rooftop plant and will contain 44 residential homes (Class C3), as well as a community space (Class F1) at the ground floor.

29. Landscaping and public realm works are proposed which include a shared community garden and play space linked with the existing Styles House to the west of the development site.

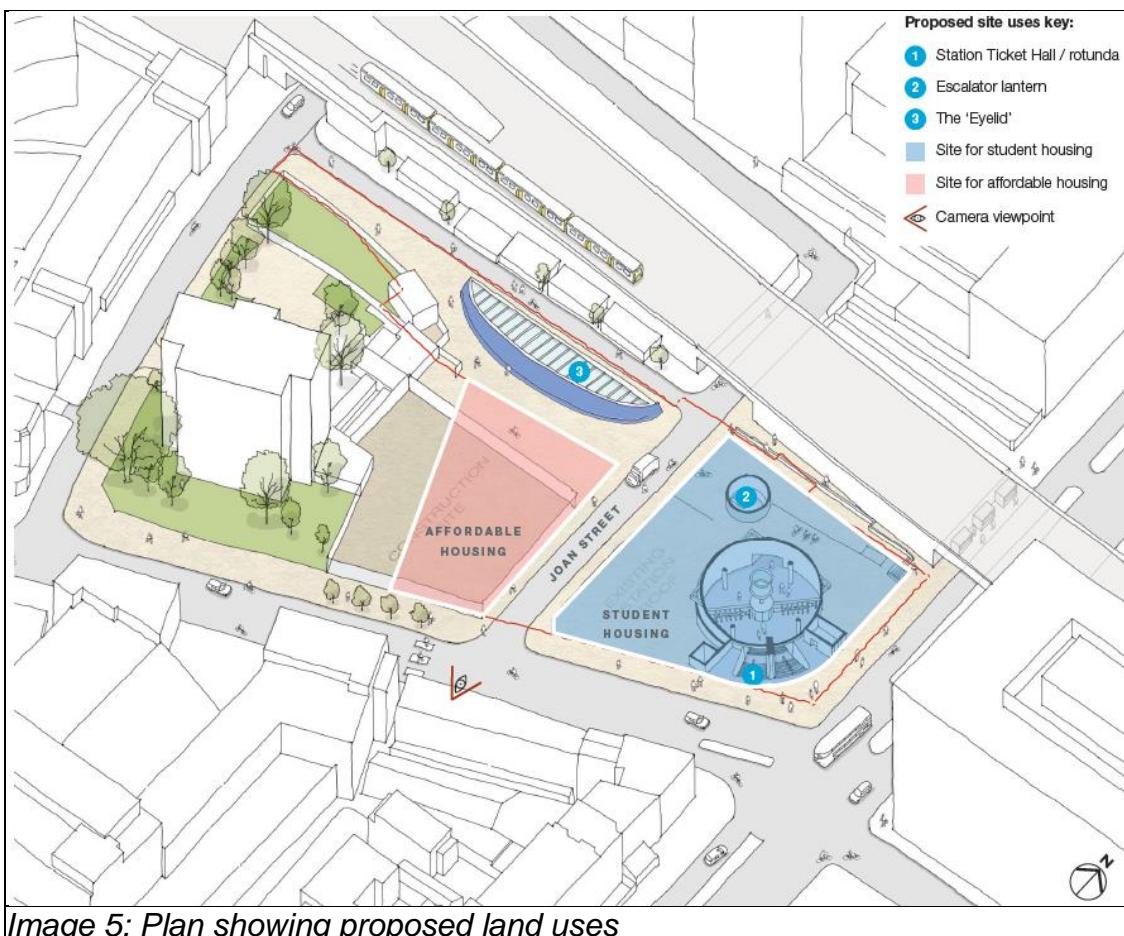


Image 5: Plan showing proposed land uses

Student Accommodation

30. The proposal includes 429 purpose building student rooms located above Southwark Underground Station. The building contains retail and/or café uses at the ground floor. The PBSA units will be direct let at market rents.

Affordable Homes

31. The proposal includes the provision of 44 affordable residential homes (Class C3) and accounts for 25.9% of the total habitable rooms on site as affordable housing. The provision of affordable housing is proposed to be 100% social rent homes.

Tenure	Number of Units	Number of Habitable Rooms	% (Habitable Room)
Social Rent	44	150	25.9%
Intermediate (Shared Ownership)	0	0	0%
Student (Direct Let)	429	429	74.1%
Total	473	579	100%

Table 1: Tenure split of affordable residential homes and student rooms

The residential building comprises 15 one bed apartments, 13 two bed apartments, 15 three bed apartments and 1 four bed family apartment.

Employment Provision

- 32. The proposal does not include the provision of any floorspace for the purpose of employment, as part of the redevelopment of the site.

Retail

- 33. The proposal includes two retail units located on the ground floor of the PBSA Block, either side of the entrances to Southwark Underground Station, fronting Blackfriars Road and The Cut. The two units combined, provide 123sqm of retail/café floor space (Class E).

Community Facility

- 34. The proposal includes a community facility located on the ground floor of the Residential Block, providing 226sqm of community use (Class F1). The community facility would front The Cut and be accessible to future residents, residents of Styes House and the wider community.

Amendments to the application

- 35. During the course of the applications, amended / updated plans were received (16 December 2024).
- 36. The changes included adjustments of the façade design, louvres, roof parapet and internal plan updates to the PBSA Block and removal of the basement level, revised ground floor footprint and elevation, increased roof plant enclosure and internal plan updates to the Residential Block. This was primarily to address matters raised by the Health & Safety Executive (HSE), reduce the weight, enhance air exchange and improve daylight penetration of the PBSA Block and as a result of the detailed design process being undertaken by the Applicant.
- 37. Updated plans and documents were provided by the Applicant which included revised architectural drawings, an amended drawing register, an updated design and access statement, and updated landscaping and public realm plans and statement.

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 2.

Previous Planning Permissions

- 39. Southwark Underground Station The Cut, 68-70 Blackfriars Road:
20/AP/1189 - Redevelopment of the site including the demolition of Nos. 49-56

Hatfields and No 1 Joan Street to provide a 17 storey (plus plant) building above Southwark Underground Station accommodating Class B1 office space and Class A1/A2/A3/A4 retail space. The development includes associated basement construction, public realm improvements and associated highways works including the closure of Joan Street – Granted 22/06/2022.



Image 6: Approved Office Scheme (20/AP/1189)

40. Land At Styles House Hatfields London Southwark SE1:

20/AP/0969 - Redevelopment of the site to include the demolition of existing buildings (the Platform Southwark building, the existing tenant management organisation hall, nine garages, a sub-station, eight studio apartments, and a storage and boiler room building); the retention and improvement to the existing Styles House building; the erection of 25 new dwellings, a new substation, a new community centre and tenant management organisation facilities; car and cycle parking; a new boiler house; landscaping; access and associated works – Granted 15/07/2021

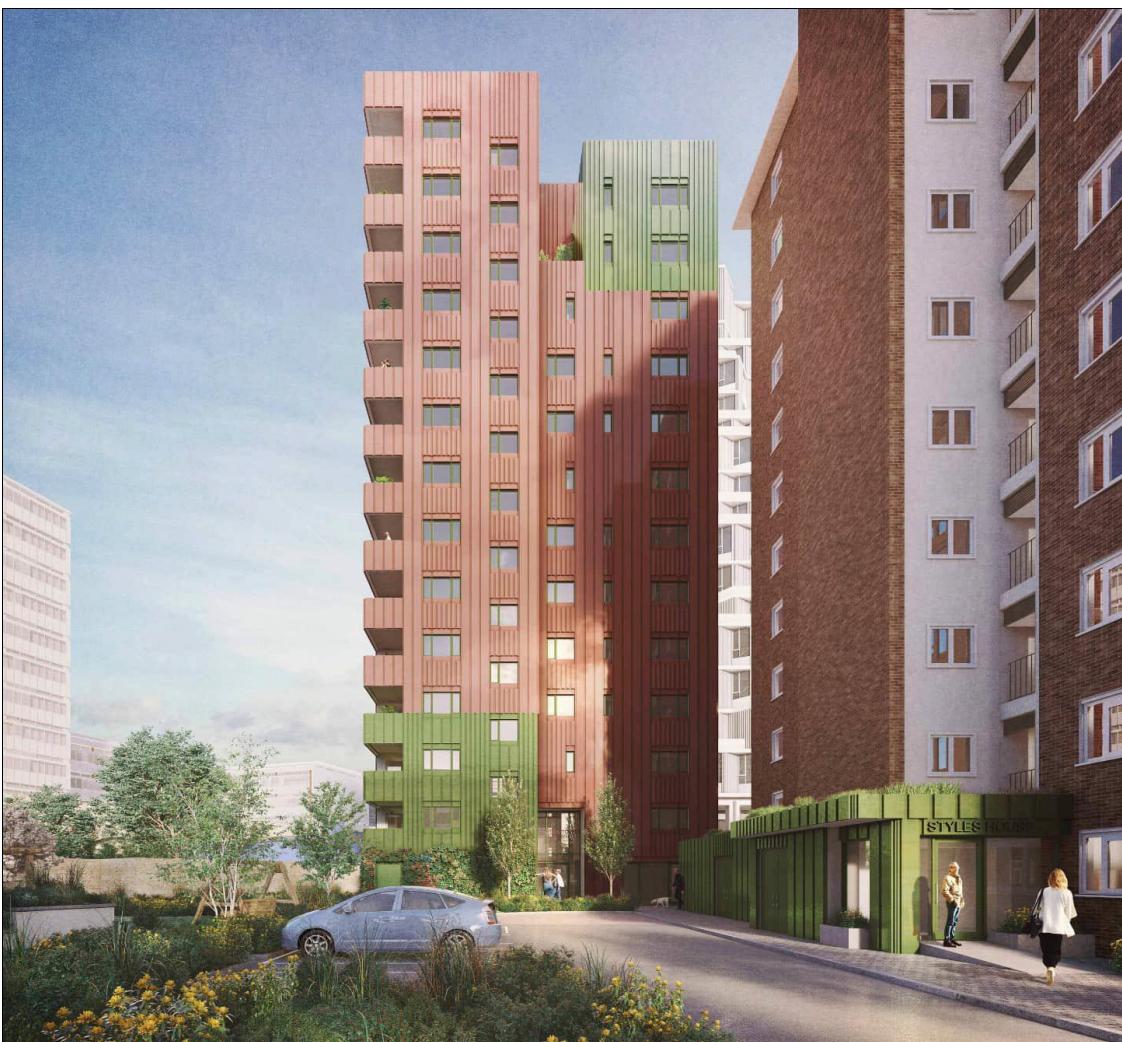


Image 7: Approved Affordable Housing Scheme (20/AP/0969)

Pre-Application

41. The following pre-application meetings have been held with respect to the proposed development on the site and Southwark Council:

- Pre-application 01: 2nd February 2024
- Pre-application 02: 13th March 2024
- Design Review Panel: 23rd April 2024
- Mayors Design Advocates: 24th April 2024
- Pre-application 03: 5th June 2024
- Pre-Application 04: 11th July 2024

42. During the course of the pre-application discussions, the principles of development were refined to include the provision of conventional affordable homes within Use Class C3 as part of any student accommodation development, the retention of Joan Street to create a separate site for the affordable housing building as well as public realm improvements and landscape treatments.

43. Different forms of massing and design were also explored through various iterations of the design evolution which are noted in the images below. The scheme was also refined to increase active frontages, not only onto The Cut with the proposed community facility but also onto Blackfriars Road with retail/café

uses to activate the street scene. It was noted that the detailed design of the elevations and the use of alternative materials should ensure that the proposed buildings provide visual interest from all angles to avoid there being a 'back' to the buildings and to make sure they related well to one another, as well as their wider context.



Image 8: Various perspectives showing design evolution of the scheme during pre-application

KEY ISSUES FOR CONSIDERATION

Summary of main issues

44. 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
 - Affordable housing and development viability

- Housing mix and quality of accommodation
- Impact of proposed development on amenity of adjoining occupiers and surrounding area, including daylight and sunlight, overshadowing, solar glare and privacy
- Noise and vibration
- Public realm and children's play space
- Heritage considerations
- Urban Design, including building heights, architectural detailing, layout and access
- Landscape and trees
- Green Infrastructure, Ecology and biodiversity
- Fire Safety
- Archaeology
- Transport and highways, including servicing, car parking and cycle parking
- Environmental matters, including construction management, waste, flooding, contamination and air quality
- Energy and sustainability, including carbon emission reduction
- Planning obligations (S.106 undertaking or agreement)
- Mayoral and borough community infrastructure levy (CIL)
- Community engagement and consultation responses
- Community impact, equalities assessment and human rights

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

Legal context

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

Planning policy

47. The following policy designations are relevant to this site:
 - The Bankside, Borough and London Bridge Opportunity Area.
 - The Central Activities Zone.
 - The Bankside and Borough District town centre.

- The Tall Buildings Area.
- The Waterloo Quarter Business Improvement District.
- The Southbank Strategic Cultural Quarter.
- An Archaeological Priority Area.
- NSP20: Southwark Station and 1 Joan Street
- Flood Risk Zone 3
- The area has a PTAL rating of 6b, indicating an excellent level of public transport accessibility.
- A hot food takeaway exclusion zone.

ASSESSMENT

Principle of the proposed development in terms of land use

Commercial uses

48. Southwark Policy ST1 (Southwark's Development Targets) seeks to deliver 460,000sqm of office floor space between 2019 and 2036, of which 166,000 sqm of floor space is proposed for site allocations within the Bankside and Borough Area.
49. Southwark Policy NSP20 (Southwark Station and 1 Joan Street) states that redevelopment of the site must provide at least 50% of the development as employment floorspace (E(g), B class).
50. Southwark Policy P28 (Access to employment and training) requires developments incorporating more than 5000sqm of gross floor area to provide training and jobs for local people in the construction stage.
51. Southwark Policy P30 (Office and business development) requires development plots within site allocations where employment re-provision is required to retain or increase the amount of employment floorspace on site and promote the successful integration of homes and employment space in physical layout and servicing in areas that will accommodate mixed use development.
52. Southwark Policy P31 (Affordable workspace) requires that developments retain small and independent businesses or ensure their provision of affordable, suitable spaces in new developments. Projects exceeding 500 sqm of employment floorspace must allocate at least 10% for affordable workspace at discounted rents, secured for 30 years, prioritising displaced or local small businesses.
53. The Proposed Development does not include any commercial or employment space and would therefore be contrary to the 50% employment floorspace requirement of Site Allocation NSP20 and fail to contribute to the office floor space delivery targets set by ST1 of the Local Plan.
54. Departure from these requirements have been carefully considered within the context of the site, surrounding area and strategic vision for the site and considered acceptable in this instance for the following reasons:

- The proposal would not result in the loss of existing office floor space from the site. As such, there is no current employment use to be relocated, and the proposed development would not harm the economy of the Borough.
- The proposal seeks to provide some jobs within the two retail units and in the PBSA Block which will increase the amount of employment floorspace currently on the site.
- There has been substantial office development within the Borough, particularly in the Opportunity Area and the CAZ with large scale offices having come forward in clusters elsewhere such as The Shard Quarter Development, The Canada Water Masterplan, Bankside Yards East and The Blackfriars Road area. It is noted that the development of Bankside Yards East and The Blackfriars Road area will exceed the 166,000sqm office floor space target for 2036 set by ST1 of the Local Plan. In addition, the consent recently granted for 18 Blackfriars Road would deliver a further 150,000sm of office space. A significant amount of office accommodation has been granted consent in Southwark over the past 4 years which should ensure the strategic plan target set out in ST1 is met and exceeded.
- The Proposed Development will help to provide much needed council housing by providing 44 social rented homes on the site, a significant increase on the 25 homes previously approved on the site. These homes would be owned and managed by the council. The scheme would also meet the identified student needs of the Borough without the loss of any existing employment uses.

55. In accordance with Policy P31, employment training and apprenticeship opportunities at both construction and operational phases are to be secured by way of a Jobs and Training Specification as part of the S106 agreement, in accordance with Policy P28.

56. The development will not result in a loss of commercial space on the site and will provide some employment opportunities by way of the retail floorspace and PBSA Block. When considering the successful delivery of office schemes within the borough the proposals would not prejudice the delivery of the aspirations of the council's strategic target for employment set out in ST1 of the Southwark Plan. While the proposal would be contrary to the requirements of Site Allocation NSP20, for the reasons set out above the provision of no commercial floorspace is considered acceptable and would not result in adverse harm to the Borough in terms of its employment and economic targets. In addition, the proposal would comply with Policy P31 in providing both opportunities for training and apprenticeships.

Delivery of housing

57. Policy H1 of the London Plan emphasises the urgent need to increase the supply of housing in London and sets out a 10-year housing of 23,550 new homes in Southwark up and until 2028/29. The policy states that Boroughs should 'optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, particularly those with a PTAL of 3-6 or within 800m of a station'.

58. The London Plan also recognises that student homes contribute toward a borough's housing target at a ratio of 2.5:1. This ratio is also recognised in Annex 4 of the Southwark Plan. The London Plan states the approach to monitoring net housing provision from different forms of non-self-contained accommodation is based on the amount of self-contained housing this form of supply will free up.
59. Southwark Policy SP1 (Homes for All) outlines a comprehensive strategy to increase housing supply and quality across Southwark. The policy aims to deliver at least 40,035 new homes between 2019 and 2036, with a target to provide a minimum 35% affordable housing, subject to viability, of which 25% should be social rented and 10% intermediate and an annual target of 2,355 homes per annum.
60. Site allocation NSP20 (Southwark Station and 1 Joan Street) of the Local Plan identifies that the site has an indicative capacity to accommodate 16 new homes.
61. The proposal provides 429 student rooms (PBSA) which would contribute the equivalent of 171 new residential dwellings toward meeting Southwark's housing delivery targets, based on the ratio of 2.5:1. In addition, 44 new affordable residential homes (100% social rent) are proposed which results in a total of 215 homes delivered on site towards the Borough's target. The proposal would comprise 25.9% affordable housing on site and a PIL payment the equivalent of a further 26.9% affordable housing giving a total of 52.8% affordable and would account for 9.13% of the annual Southwark housing target a significant contribution to meeting that target.
62. It is considered that the application is in accordance with Policy H1 of the London Plan and Policy SP1 and P1 of the Southwark Plan in delivering new homes to help meet Southwark's housing targets. The provision of the equivalent on site of 215 homes, 44 of which would be affordable homes, will assist the Council in addressing this housing need while also meeting housing delivery targets by delivering council housing.

Retail uses

63. 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.
64. 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.

- 65. The proposed development includes two retail/caf   units on the ground floor of the PBSA Building, located on either side of the entrance to the Southwark Underground Station and have been designed to activate the frontages onto the Cut and Blackfriars Road. The nominated uses of the retail units would fit within Use Classes E(a), E(b) and E(c) as required for development with the CAZ. Furthermore, while the site does not have existing protected retail frontages, it does fall within The Bankside and Borough District Town Centre, where retail is encouraged. Lastly, the proposed retail units would comply with the site-specific allocation NSP20 which specifically requires active ground floor frontages on both Blackfriars Road and The Cut.
- 66. In accordance with Policy P35, the proposed retail/caf   units 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 under Use Class E as would otherwise be possible under Permitted Development Rights. This will afford the owner a degree of flexibility in the event that the intended retail/caf   function is deemed unfeasible, while ensuring the use of the unit continues to provide a public service and active frontage.
- 67. Overall, the provision of retail units complies with the Southwark Plan Policy P35 and the site-specific allocation NSP20 where ground floor retail uses are included within the list of those must be provided.

Community Use

- 68. Southwark Plan Policy P47 (Town and Local Centres) sets out community use requirements, where new development must retain existing community facilities and where new community facilities are proposed, encompass a wide range of uses to meet diverse local needs and be accessible for all members of the community.
- 69. The proposed development includes a community use on the ground floor of the Residential Building which encompasses an events hall, community kitchen and office space. It has been designed to have two entrances, one from Styles House and another via Joan Street and, includes large picture windows which address the Cut. The proposed community facility would comply with the site-specific allocation NSP20 which specifically requires active ground floor frontages on The Cut.
- 70. It is noted that the proposed development seeks to reinstate community facilities on the site as secured under the previously approved scheme (ref: 20/AP/0969) which will benefit not only the residents of the Styles House but also the wider community. The proposed community facility would also be larger than that permitted and provides additional community benefits in the form of a shared community garden and terrace which is part of the landscaping and public realm works, discussed later in this report.

71. Overall, the provision of community facilities complies with the Southwark Plan Policy P47 and the site-specific allocation NSP20 where ground floor community uses are included within the list of those that are acceptable for the redevelopment of the site.

Student Accommodation

72. 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.

73. 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.

74. Part A of Policy H15 states that boroughs should seek to ensure the local and strategic need for PBSA is addressed, provided that:

- the development contributes to a mixed and inclusive neighbourhood.
- it is secured for occupation by students.
- the majority of bedrooms and all affordable student accommodation is, through a nomination's agreement, secured for occupation by students of one or more higher education providers;
- the maximum level of accommodation is secured as affordable student accommodation and;
- the accommodation provides adequate functional living space and layout.

75. 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.

76. Policy P5 of the Southwark Plan requires PBSA proposals where all the bedspaces would be 'direct-lets', as is the case with this scheme to:

- 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.

77. 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 in a nominations scheme to be subject to a nominations agreement subject to viability.

78. When assessing the principle of a student housing scheme, the policies outlined above require consideration of:

- the principle of introducing a student 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.

79. The following paragraph 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.

80. This site is identified for the provision of housing with an indicative capacity of 16 homes. Providing additional homes above this estimated capacity may be acceptable subject to other considerations including the provision of affordable housing and the design, scale and impact of development on neighbouring sites which are considered later in this report and the contribution the scheme would make to a mixed and inclusive neighbourhood. In all, the equivalent of 215 homes would be provided on the site (including the student homes) and of these 25.9% would be affordable by habitable room. With the equivalent of a further 157 affordable habitable rooms being secured off-site by way of a s106 payment.

81. Subject to design and amenity considerations the proposed conventional and student housing scheme would help to meet the Council's housing targets set out in the Southwark Plan and London Plan and deliver the housing capacity identified for this site.

82. For the reasons given above, the proposed conventional affordable housing and student accommodation use would help contribute to, 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.

Is there a local and strategic need for student housing?

83. 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.

84. 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.
85. 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.
86. The applicant has submitted a Planning Statement as part of the Application which considers the economic impact of the proposed PBSA. It notes the following key points:
 - London is home to over 40 universities and higher education institutions, that include some of the most prestigious in the world. As such, London is one of the most sought-after educational hubs globally and attracts a diverse and significant population of students both from within the UK and abroad.
 - According to the Higher Education Statistics Agency (HESA), London has nearly 400,000 students enrolled in higher education, of which around a quarter are international students. The number of students within the universities and higher education institutions has been increasing annually and this has placed considerable strain on the London housing market.
 - Savills' 2023 report 'The UK Student Housing Report' identified there were around only 121,000 PBSA bed spaces available in London, with the result that most students have no choice but to go into the private rented sector. This can lead to higher costs and competition with local residents for housing.
 - Research by the National Union of Students and Unipol ('Accommodation Costs Survey' 2022) found that nearly 70% of full-time students in London lived in private rented accommodation.
 - A study conducted by Knight Frank for Scape Living (a leading PBSA provider in London), found that when new PBSA developments came forward, more students opted for purpose-built accommodation and there was a reduction in private rented prices, as more housing was freed up (Knight Frank, 2022 'PBSA and its Impact on the Housing Market').
 - A 2023 report by JLL entitled 'London Residential Market Report' found that, in Camden and Tower Hamlets, new PBSA developments led to a

modest decrease in rent compared to areas without new PBSA developments.

- Overseas students make up a large part of the student body at London universities and these students have significant levels of spending in particular in Southwark. The off-campus spending of the 8,500 overseas students living in the borough is estimated to be £125.5 million annually.
- As a centrally located Borough, Southwark is home to a number of higher education institutions with teaching facilities and student accommodation, including London South Bank University, King's College London, University of the Arts and the London School of Economics. There are also a number of smaller satellite campuses within the Borough.

87. In summary, while the proposed accommodation would add to a number of preexisting direct-let student housing developments in the borough, it would nevertheless contribute towards the boroughs 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 and Policy P5 of the Southwark Plan.

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

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

89. The area surrounding the application site is a mix of retail, commercial, educational and residential uses. Directly opposite the site, to the south is Southwark College and a mixed-use building fronting the Cut containing a supermarket and restaurant at the ground floor with residential apartments above. Southwark Underground Station is within the site and directly below the proposed PBSA Building. Directly to the north and east of the site are large office buildings being Columbo House and Palestra House. The immediately adjoining parcel of land to the west contains Styles House which is 12 storey residential flat building. Further west of the site and south along The Cut are various shops and restaurants as well as the Young Vic – performing arts theatre. In this surrounding land use context, the proposed student-housing led scheme with a significant on-site affordable housing element would sustain a mixed and inclusive neighbourhood through the introduction of an alternative residential product and demographic in addition to conventional affordable housing.

90. The impacts arising from the 429 new residents (some student, some in the affordable housing) are discussed in the later relevant parts of this report (amenity, 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 new infrastructure to meet the needs of the local population. This is considered satisfactory with regard to mitigating the additional demand placed on local services and infrastructure as a result of the proposed student accommodation.

91. On this basis, the proposed land use is considered to be broadly in conformity with Southwark Plan and London Plan policy. Introducing a mix of student housing and conventional affordable housing into a CAZ, and one where

conventional residential use are well represented, is not considered to cause harm and would contribute to a mixed and inclusive neighbourhood.

Is a nominations agreement in place?

92. Criterion 3 of London Plan Policy H15(A) requires the majority of the accommodation within a PBSA proposal to be secured for students through a nominations agreement with one or more HEIs.
93. The applicant does not intend to enter into a nomination's agreement with a HEI for any of the proposed accommodation; instead, the accommodation will be directly managed by an independent provider which is usually referred to as direct let student housing. 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 student accommodation being affordable (27%). In this instance the on-site affordable housing element has been prioritised rather than the on-site affordable student housing provision. This has enabled the affordable housing provision to be delivered at 25.9% of the total habitable rooms on the site (all of which would be social rent) with the equivalent of a further 26.9% to be offered as part of a s106 payment in lieu (PIL).
94. Accordingly, it is considered that the development proposal complies with the affordable requirements that Policy P5 sets out for direct-let schemes.

Is the location suitable for student accommodation?

95. Part B of London Plan Policy H15 requires student housing scheme sites to be well connected by transport to local services. Situated above Southwark Underground Station and 50-70m from bus services along Blackfriars Road, the site benefits from excellent accessibility to public transport (as reflected in its PTAL rating of 6b), services and established higher educational facilities. There are several universities with campuses within a 3-mile radius of the site including London South Bank University, King's College London, University of the Arts, Southwark College and the London School of Economics. Furthermore, at present there is not a large concentration of student accommodation in the vicinity.

Summary on the principle of student housing

96. 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 location meeting borough need and demand whilst also providing much needed conventional affordable housing contributing to a mixed and inclusive neighbourhood.

Conclusion on land use

97. The proposals include a range of uses which will make a significant contribution towards the role and function of area, through the provision of 226sqm of community facilities, 123sqm of retail/café floorspace, together with 429 purpose built student units and 44 new affordable residential homes to meet identified housing need. It will fulfil the aspiration set out in the Site Allocation to provide active frontages with ground floor retail and community uses on Blackfriars Road and The Cut and meet and exceed the sites indicative residential capacity of 16 homes. Together with the proposed student housing, this will deliver a significant uplift in new homes, the equivalent of 215 homes towards meeting the Council's housing targets whilst contributing to the creation of a mixed and inclusive community.

Environmental impact assessment

98. 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.

99. The council was requested to issue a screening opinion (ref: 24/AP/2354) as to whether the proposed development, due to its proposed size and scale, would necessitate an Environmental Impact Assessment (EIA).

100. The conclusion of this assessment was that no significant likely effects have been identified and accordingly the proposed development would not be likely to have significant effects upon the environment by virtue of factors such as its nature, size or location.

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

Affordable housing and development viability

102. Policy H15 of the London Plan requires a proportion of student rooms to be subsidised and for the majority of units to be covered by a Nomination Agreement with a named higher education establishment. The London Borough of Southwark has taken a different approach. It requires the delivery of conventional affordable housing to be the priority within PBSA development and its policies that support that are more up to date than the London Plan. As such, and in accordance with the NPPF, the Local Plan policies take precedence.

103. The proposed development includes the provision of 44 new affordable homes which comprises 150 affordable habitable rooms which is 25.9% of the total habitable rooms on the site (all of which would be social rent). In addition, to the provision of on-site affordable housing, the proposed development includes the equivalent of a further 26.9% to be offered as part of a s106 payment in lieu (PIL).

Tenure	Number of Units	Number of Habitabile Rooms	% (Habitabile Room)
Social Rent	44	150	25.9%
S106 PIL	0	156 (equivalent)	26.9%

(£15.685m)			
Intermediate	0	0	0%
Direct Let	429	429	
Student			
Total	473	579 (on-site)	52.8%

Table 2: Tenure split of accommodation including S106 PIL

104. When considering the on-site provision of affordable housing and the S106 PIL toward off-site housing, the proposed development is equivalent to an affordable level of 52.8% which exceed the 50% affordable housing requirement for developments on publicly owned land and would exceed the 40% “fast track” level set by P1 of the Southwark Plan which means that the scheme neither requires the submission of a Financial Viability Review or a late stage review. The GLA note that policy H8 E of the London Plan “Estate Regeneration” requires all estate regenerations to provide an uplift of affordable housing on site and to have an FVA. This scheme does provide a significant uplift in affordable housing and under the terms of the more up to date Southwark Plan fast track policy in P1 does not require an FVA or late stage review.
105. To achieve this high level of affordable provision, the proposal is being put forward on the basis of having no Nominations Agreement in place and for the student accommodation to be direct let without any affordable student housing on site. Given the significant council housing delivery being achieved as a result this approach is considered to be acceptable. .
106. Overall, the proposed development provides a level of affordable housing both on site and in the form of a S106 PIL which together, meet the requirement of both policy P1 and P5 of the Southwark Plan.

Housing mix

107. Policy H10 of the London Plan states that residential schemes should generally consist of a range of unit sizes, with applicants and decision-makers having due regard to a number of considerations, including the housing evidence base, delivering mixed and inclusive neighbourhoods, the nature and location of the Site together with the aim of optimising the potential of housing site. Southwark Plan Policy P2 sets out the housing mix for major residential developments. This includes a minimum of 60% of homes with two or more bedrooms and within the suburban zone, 20% of family homes with three or more bedrooms in the Central Activities Zone (CAZ).
108. The table below summarises the residential housing mix of the Proposed Development.

Residential Homes	Quantity	Unit Mix	No. Habitable Rooms	% Habitable Rooms	Occupancy
1 Bed	15	34.1%	30	34%	30
2 Bed	13	29.5%	39	30%	52
3 Bed	15	34.1%	75	34%	75

4 Bed	1	2.3%	6	2%	5
Total	44		150		162

Table 3: Residential housing mix by habitable room and occupancy

109. The proposed development would achieve a housing mix of 65.9% homes with two or more bedrooms and 36.4% homes with three or more bedrooms and therefore meets the requirements of Policy P2. The provision of larger family homes is particularly welcome.

Quality of Accommodation

Student Accommodation

110. London Plan Policy H15 requires purpose-built student accommodation to provide adequate functional living space.

111. There are no specific housing standards for student housing and given the different needs and management of student housing in comparison to conventional housing, it is not appropriate to apply standard residential design standards to student housing. The student rooms themselves comprise a range of room types to suit varying needs including small, medium and large studios with ensuite bathrooms and accessible studios with ensuite bathrooms. All studios will have integrated storage, study area with desk, kitchen facilities and will be provided with an ensuite shower room.

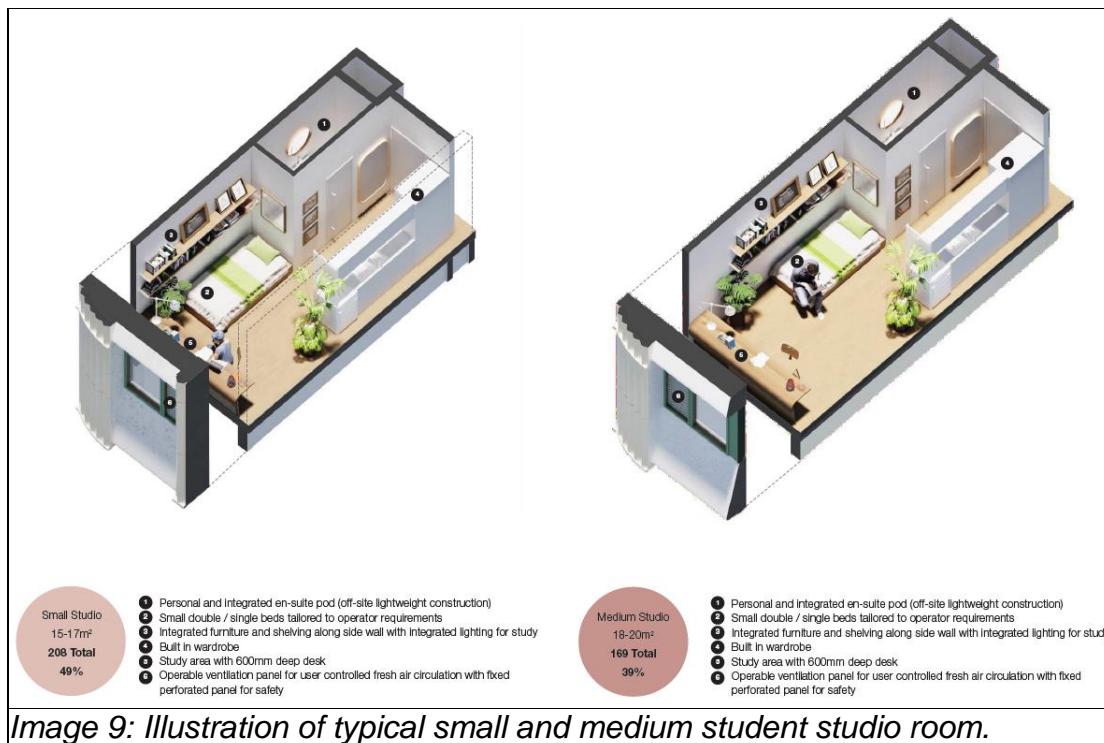
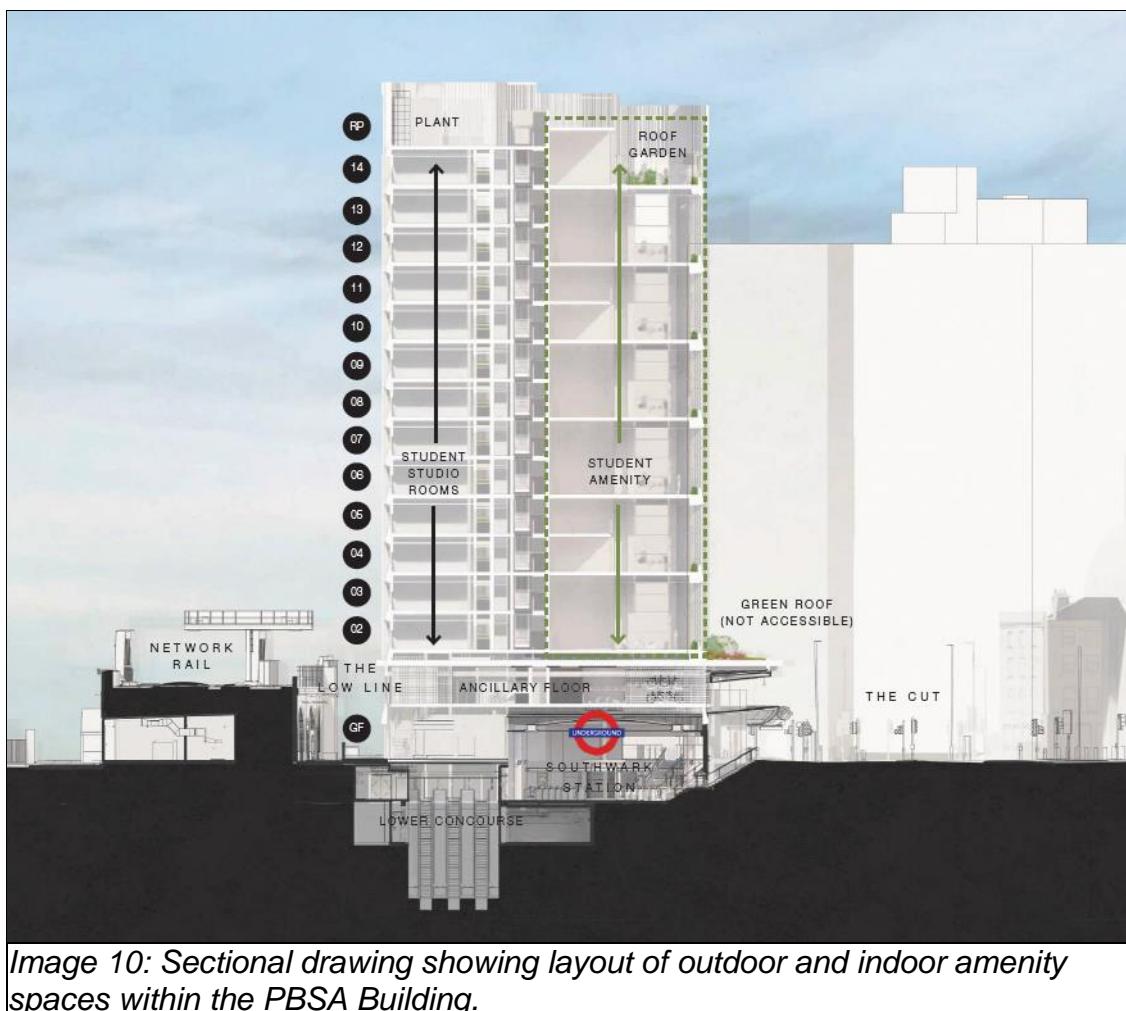


Image 9: Illustration of typical small and medium student studio room.

112. All residents would have access to dedicated double height indoor amenity spaces throughout the PBSA Building with main spaces accessed on every other floor and smaller mezzanine spaces located on alternate floors. The main spaces are intended to provide students with dining, gymnasium, wellness facilities

and/or event and social spaces while the smaller mezzanines will provide functional facilities such as laundry. A total of 602 sqm of indoor communal amenity space will be provided for access to students in addition to a rooftop garden for outdoor amenity.



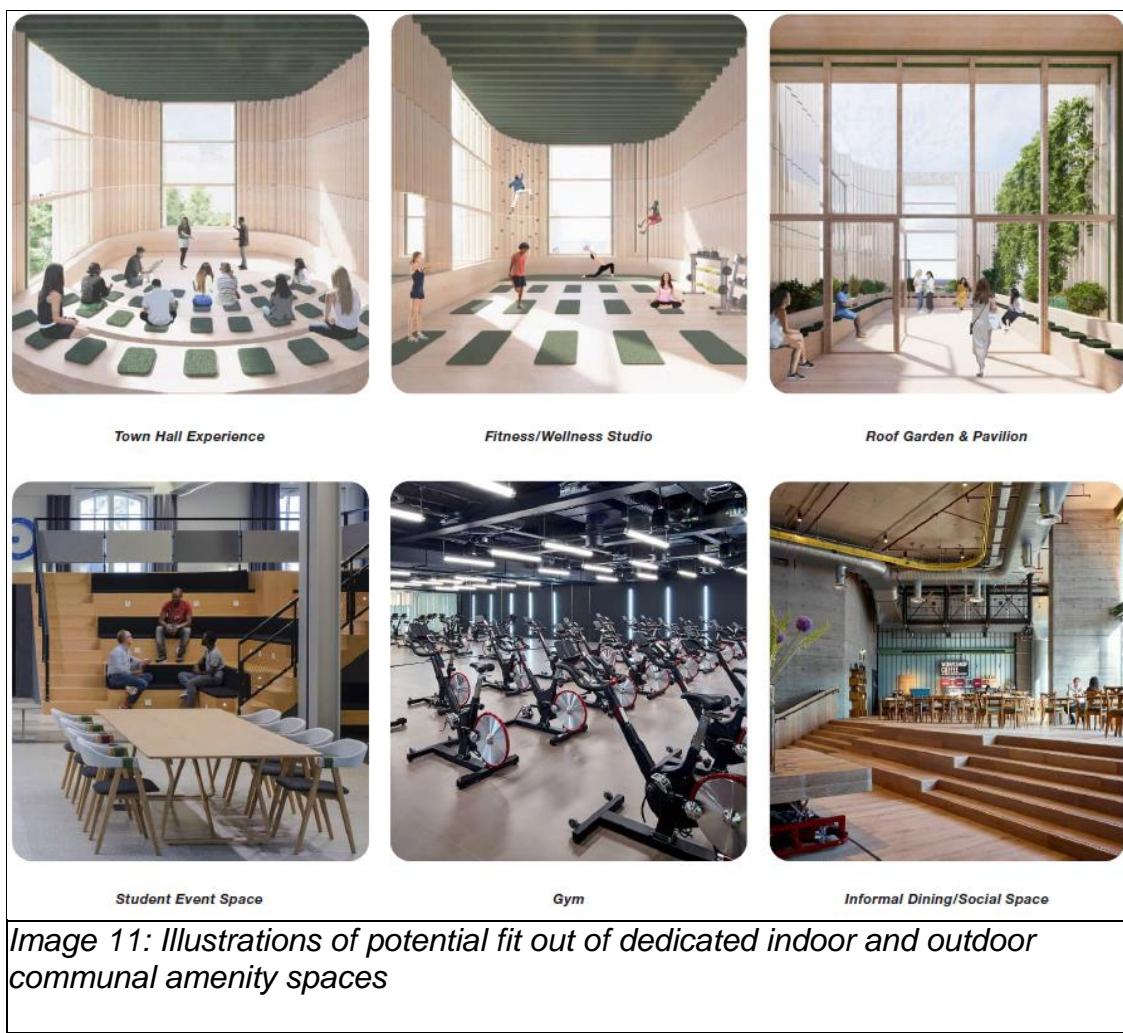


Image 11: Illustrations of potential fit out of dedicated indoor and outdoor communal amenity spaces

113. SP Policy P5 requires 5% of student rooms to be wheelchair accessible. Two adaptable rooms per floor are provided from Level 2 to Level 14 of the PBSA Building and will be designed to accommodate wheelchair users meeting the requirements of Building Regulations M4(3) 'wheelchair user dwellings' which equates to a total of 26 bedrooms proposed. This provision accounts for 6% of the total student bedrooms, exceeding the minimum requirement set by local policy. These rooms are centrally located, benefiting from easy access to the lift lobby to ensure accessibility for wheelchair users. The provision of wheelchair user accommodation will be secured through the Section 106 Legal Agreement.

Residential Accommodation

114. The proposed residential building would deliver high-quality accommodation. It follows the principles of inclusive design, with all units to meet M4(2) standards – this includes 10% (5 homes) delivered as wheelchair adaptable under M4(3), which would also account for 10% of the social rented units required under SP Policy P8.

115. The design of the 44 new homes would all meet or exceed the minimum space standards prescribed by the Southwark Plan, with all apartments achieving floor to ceiling heights of at least 2.5m throughout or at minimum, in living rooms and bedrooms. 80% of the apartments have also been designed to be dual aspect to maximise natural light and ventilation and there would be no north facing single

aspect flats. The Application Scheme provides a high standard of residential design by ensuring that no more than six dwellings are accessed from a single core per floor, with all flats having access to private outdoor balcony space. While it is noted that 22 apartments would have balconies less than 10sqm in size, these apartments contain two or less bedrooms and as can be seen below the balconies are all of a relatively generous proportion size and area carefully integrated into the flat layouts. All apartments with three or more bedrooms would have access to private balconies greater than 10sqm in size, thus complying with the residential design requirements of the Local Plan. In addition, the affordable units would have access to significant public realm and landscape works which are proposed for the adjacent Styles House including a playground, community garden and community hall lawn and spill out space, which comprise a significant benefit of the scheme.





Image 13: Illustration of the internal layout of a typical 3 bed residential apartment

116. In terms of accessibility, a total of 5 affordable residential flats have been designed in accordance with Part M4(3) to be wheelchair accessible or adaptable units. This provision accounts for 11.4% of the residential building, exceeding the minimum requirement. These rooms are also evenly distributed across the buildings to ensure accessibility for wheelchair users.
117. Overall, the Application Scheme is considered to represent a high standard of design quality of both the residential and student accommodation. All homes will have access to indoor and outdoor amenity space and the scheme has been designed to be inclusive and accessible across the student and residential blocks. As such, the proposal is considered to accord with requirements of the Local Plan.

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

118. 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

119. 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.

BRE Daylight Tests

120. 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.

121. The second method is the No Skyline (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.

BRE Sunlight Tests

122. The BRE sunlight tests should be applied to all main living rooms and conservatories which have a window which faces within 90 degrees of due south. The guide states that kitchens and bedrooms are less important, although care should be taken not to block too much sunlight. The tests should also be applied to non-domestic buildings where there is a particular requirement for sunlight. The BRE guide states that sunlight availability may be adversely affected if the centre of the window:

- receives less than 25% of annual probable sunlight hours, or less than 5%

of annual probable sunlight hours between 21 September and 21 March and

- receives less than 0.8 times its former sunlight hours during either period and has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.

123. In addition, the BRE sets out specific guidelines relating to balconies on existing properties. This guidance acknowledges that balconies and overhangs above an existing window tend to block sunlight, especially in summer. Even a modest obstruction may result in a large relative impact on the sunlight received. As a result, they advise that the impact of existing balconies can be demonstrated by carrying out additional PSH calculations, for both the existing and proposed situations, with the balconies notionally removed.

124. The applicant has undertaken a daylight and sunlight assessment which has analysed the impacts of overshadowing to the daylight and sunlight amenity of the following neighbouring properties:

- Benson House
- No. 36 The Cut
- Nos. 1-48 Styles House
- No. 1 The Cut
- Nos. 3-11 The Cut (Ring Court)
- No. 77 Blackfriars Road
- Rowland Hill House

125. The analysis of overshadowing impacts to these properties have been considered in two stages:

- Stage 1 - Is there a strict compliance with the BRE Guidelines?
- Stage 2 - Is there “unacceptable loss” to the daylight and sunlight as a result of the Proposed Development?

And also broken this down further into two scenarios which compare:

- Existing vs Proposed
- Consented vs Proposed

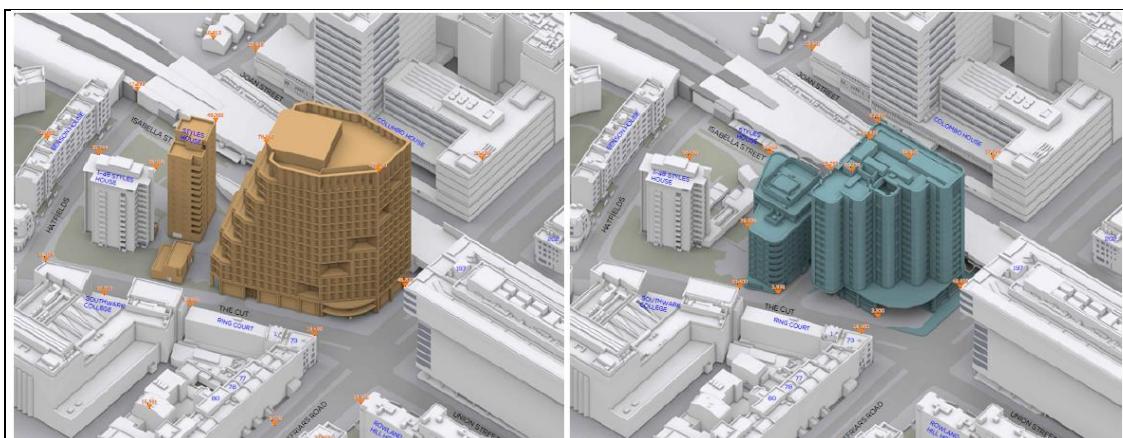


Image 14: Perspective view of the Consented Development and Proposed Development showing identified surrounding sensitive residential properties

126. With regards to impacts, Benson House and No. 36 The Cut were found to remain fully BRE compliant and have therefore not been considered in further depth. The remaining properties have considered in detail below.

Impact to Nos. 1-48 Styles House

127. This property is a 12 storey residential block of flats located to the west of the Site. A total of 104 windows and 24 rooms were assessed with respect to VSC and NSL. Under the VSC assessment, 75 (72%) of the 104 windows assessed would remain BRE Compliant. Of the remaining 29 windows:

- 10 would experience a reduction of between 20% - 30% which is considered a minor level of impact.
- 9 would experience a reduction of between 30% - 40% which is considered a moderate level of impact.
- 10 would experience a major reduction of between 40% - 50% which is considered a major adverse impact

It is noted that 65% of the windows impacted would retain VSC values of above 15% while the remaining 10 windows would retain VSC values between 11 - 15%.

128. With regards to NSL, all 24 rooms would meet the BRE guidance. Furthermore, with regard to sunlight, all 46 windows which face within 90 degrees due south of the Site, fully comply with the BRE APSH.

129. When considering the impacts between consented and proposed, it is noted that 55 out of 104 windows would see a betterment in VSC values and 35 windows would have the same VSC when compared to the consented scheme. While the remaining 14 windows would experience a marginal reduction in the VSC values, compared to the consented scheme, the absolute change to these windows would not exceed 0.4%.

130. Overall, most windows would experience minimal impacts which are within the BRE Guidelines. While it is noted that 29 windows have been identified to experience VSC reductions beyond the 20%, these impacts are considered acceptable given all rooms are dual aspect and benefit from windows that would remain unaffected in terms of VSC and given most of these impacted windows would retain VSC values above 15%. Furthermore, all rooms would remain BRE compliant and in terms of sunlight all windows would comply with the APSH. Lastly, given the location of the site within central London and that the proposed scheme would result in an overall improvement to the VSC values when compared with the consented scheme, these impacts are considered acceptable in this instance.

Impact to No. 1 The Cut

131. This building is a mixed-use property located to the south of the Site with residential flats situated on 1st - 4th floors. A total of 9 windows and 8 rooms were assessed with respect to VSC and NSL. Under the VSC assessment, 1 of the 9 windows assessed would remain BRE Compliant. Of the remaining windows, all 8 would experience impacts in excess of 40% and would retain VSC values of between 10% - 16%.

- 132. When considering daylight, 1 out of 8 rooms assessed would meet the BRE Guidelines. Of the remaining 7 rooms which would experience a reduction of greater than 20%, a living/dining room on the 1st floor of the building would retain a NSL value of 18% while the remaining 6 impacted rooms would retain NSL values between 39% - 51%. There are no windows within this building which face within 90 degrees of the Site relevant for assessment against the BRE APSH.
- 133. When considering the impacts between consented and proposed, there would be a material betterment to all windows located on this adjoining property, in terms of daylight retained to impacted windows. When compared to the consented scheme, the retained VSC values would increase from between 7% - 12% to between 10% - 16%.
- 134. Overall, while it is noted that the most windows would experience a major adverse impact, beyond the BRE Guidelines, at present the properties at 1 The Cut benefit from unobstructed views across the site which lies undeveloped beyond the single storey entrance structure. It would be unrealistic to assume this situation could be maintained in central London. This results in unimpeded access to daylight and views of the sky that are not typical for such a central London location. Furthermore, of these windows impacted, it is noted that all would experience an improved VSC value when compared with the consented scheme. On balance, it is considered that the impacts to daylight and/or sunlight would not be harmful to the occupiers' residential amenity and are acceptable against the wider benefit so the development.

Impact to Nos. 3 - 11 The Cut (Ring Court)

- 135. This building is a mixed-use property located to the south of the Site and includes residential accommodation on the upper floors (1st - 3rd floors). In terms of layout, it should be noted that the principal living areas are located on the southern façade which would be unaffected by the proposal, while the windows facing the application site serve bedrooms and kitchens.
- 136. A total of 15 windows and 14 rooms were assessed with respect to VSC and NSL. Under the VSC assessment, 5 windows (33%) would remain BRE Compliant. Of the remaining 10 windows, 1 would experience a moderate reduction in excess of 30% and 9 would experience major reductions in excess of 40%. It is noted that 4 of these impacted windows are deeply recessed within the building beneath external walkways or a roof overhang which will self-limit the ingress of light from the sky to the windows beneath them. As such, the retained VSC values for these windows is between 1% - 4% in the proposed scenario. The remaining six windows retain VSC values between 12% - 20%.
- 137. With regards to NSL, out of 14 rooms, 7 (50%) would meet the BRE guidance. However, it is noted that two bedrooms (F01/R1 and F03/R4) would retain NSL values of 42% and 44% respectively while the remaining five rooms would retain NSL values in excess of 64%. There are no windows within this building which face within 90 degrees of the Site relevant for assessment against the BRE APSH.
- 138. When considering the impacts between consented and proposed, it is noted that

all windows would see a betterment when compared to the consented scheme with the absolute VSC values increasing by between 1% - 6%.

139. In summary, while most windows would experience significant impacts beyond the BRE Guidance, they are associated with bedrooms and kitchens and also recessed within the building beneath external walkways or a roof overhang which obstructs access to daylight and sunlight. Furthermore, of these windows impacted, it is noted that all would experience an improved VSC value when compared with the consented scheme and also retain high NSL values above 42%. On balance, it is considered that the impacts to daylight and/or sunlight would not be harmful to the occupiers' residential amenity.

Impact to No. 77 Blackfriars Road

140. This is a ground floor studio flat located to the south of the site. A total of 3 windows were assessed with respect to VSC with 1 window meeting the BRE Guidance while the remaining 2 windows would experience a reduction of 21% and 29% respectively. In terms of NSL, all rooms would meet the BRE guidance for daylight.

141. When considering the impacts between consented and proposed, it is noted that all windows would see a betterment when compared to the consented scheme with the absolute VSC values increasing by between 1% - 2%.

142. In summary, this property would experience a reduction in VSC beyond the BRE guidance which is considered minor. However, it is noted that the two windows impacted would experience an improved VSC value when compared with the consented scheme and all rooms would be fully compliant with NSL in terms of daylight. On balance, it is considered that the impacts to daylight and/or sunlight would not be harmful to the occupiers' residential amenity.

Impact to Rowland Hill House

143. This property is a block of residential flats located to the southeast of the site and has a main frontage to Union Street.

144. A total of 37 windows and 32 rooms were assessed with respect to VSC and NSL. Under the VSC assessment, 12 windows (32%) would remain BRE Compliant. Of the remaining 25 windows, 21 would experience major VSC reductions in excess of 40%. It is noted that these windows have low existing VSC values between 1% - 9% and will experience a reduction between 0% - 7% as a result of the proposed scheme. Of the other 4 windows, 2 windows would experience minor VSC reductions of 22% while the remaining 2 windows would experience moderate daylight reductions of 34% with VSC values reducing from 21% to 14%.

145. With regards to NSL, out of 32 rooms, 30 (94%) would meet the BRE guidance. The 2 windows impacted would experience minor reductions in NSL values of 21% and 22% however, are associated with kitchens located on the first floor. There are no windows within this building which face within 90 degrees of the Site relevant for assessment against the BRE APSH.

- 146. When considering the impacts between consented and proposed, it is noted that of the 37 windows assessed, 24 (65%) would see a betterment when compared to the consented scheme while the remaining 13 windows would have the same VSC values.
- 147. Overall, while it is noted that over 50% of the windows associated with this property would experience a major adverse impact of 40%, beyond the BRE Guidelines, these windows currently have low VSC values and given their location relative to proposed development and within the context of Central London is considered difficult to protect. Furthermore, of these windows impacted, it is noted that all would experience an either unchanged or improved VSC value when compared with the consented scheme. On balance, it is considered that the impacts to daylight and/or sunlight would not be harmful to the occupiers' residential amenity and are acceptable against the wider benefit of the development.

Conclusion on daylight and sunlight

- 148. In total, the development would result in 14 minor, 12 moderate and 48 substantial adverse reductions in VSC for surrounding properties. With respect to NSL, there would be a total of 7 minor, 1 moderate and 9 substantial reductions for surrounding properties. This equates to 31% of windows assessed not meeting the BRE's recommendation for VSC and 11% of rooms assessed not meeting the BRE guidance for the NSL. 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.
- 149. However, when interpreting the daylight losses, regard must be had to the existing, underdeveloped nature of the site, as well as its location within a medium-high scale mixed use and commercial environment within Central London. Where there are reductions in excess of the guidance, this is largely due to windows which overlook an undeveloped site and thus experience uncharacteristically high levels of existing daylight. It is also noted that some of the most impacted properties have design features that significantly limit the existing internal light levels and low existing VSC values, as a result of which any meaningful development on neighbouring land would generate sizeable percentage losses.
- 150. It is also worth noting that all properties would see a material betterment to their daylight and sunlight when compared against the extant planning permission, with the exception of 14 windows within Styles House which will see a very marginal reduction of between 0% - 0.4% in their VSC which is considered to be unnoticeable. Furthermore, all windows would meet the BRE criteria for APSH.
- 151. Given the site allocation under the Southwark Local Plan, 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. Whilst the majority of windows tested meet BRE requirements, a relatively small minority of the impacts would go beyond the recommended guidelines which are not of such significance that would

warrant a reason for refusal of an otherwise acceptable development.

Overshadowing of amenity spaces

152. Section 3.3.17 of the BRE Guidelines recommend that at least half of a garden or amenity area should receive at least two hours of sunlight on the 21st of March. If, as a result of new development, an existing garden or amenity area does not meet this and the area which can receive two hours of sun on the 21st of March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is recommended that the centre of the area should receive at least two hours of sunlight on 21st March.
153. In this regard, the overshadowing impacts of the proposed development on the external amenity spaces located on Isabella Street and the adjoining Styles House have been considered. Approximately 98% of the amenity area at Isabella Street currently receives two hours of direct sunlight on the 21st of March. The proposed development would result in a minor reduction however, 94% of the amenity space would retain two hours of direct sunlight and therefore satisfies BRE recommendations for overshadowing. With regard to Styles House, approximately 64% of the amenity space currently receives two hours of direct sunlight on the 21st of March. Upon implementation of the proposed development, a minor reduction would be experienced, however approximately 63% of the amenity space will continue to enjoy at least two hours of direct sunlight and therefore satisfies BRE recommendations for overshadowing.
154. Overall, the direct impacts of the proposed development on adjoining amenity spaces are considered to be minor both properties identified retaining all if not most existing levels of solar access to these areas. Whilst it is acknowledged that the adjoining outdoor amenity spaces of Isabella Street and the Styles House will be impacted, this accounts for a minor reduction in sunlight to these areas in March which would not affect compliance with the BRE Guidelines. As such, the proposed impacts are considered acceptable and would not be unduly harmful to the outdoor amenity of adjoining residents.

Solar Glare

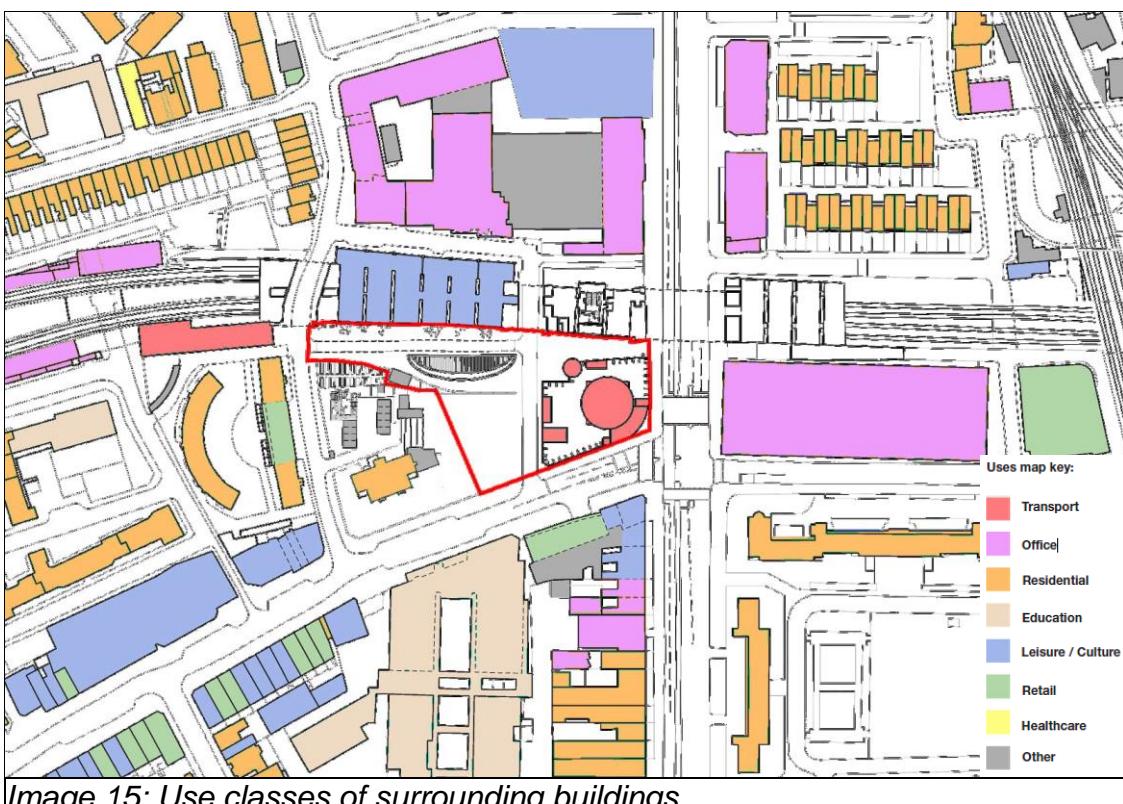
155. Various nearby viewpoints have been considered for impacts as a result of solar glare. This analysis has identified instances of solar glare that may occur throughout the year at various times of the day depending on the exact point of observation.
156. Due to the partially solid nature and design of the building facades, Sunlight will be typically reflected into the eyes of the driver by no more than one window at any one time or very thin strips of the glazed terracotta cladding. As such instances of solar reflection would be of short or very short duration and limited when seen from a moving vehicle. It is therefore concluded that there will be no significant impacts resulting from the proposed development with regards to solar glare.

Outlook and privacy

157. 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.

158. The image below shows the breakdown of the surrounding buildings. This shows that the majority of the adjacent structures are mixed use properties comprising office and retail buildings and some residential buildings. It is noted that Southwark College is also located directly opposite the site.



159. The distance between Palestra House to the east and the western elevation of the PBSA Building, fronting Blackfriars Road is approximately 25m. While the distance between the mixed-use buildings to the south at No. 1 The Cut and Nos. 3-11 The Cut, and the southern elevations of both the PBSA and Residential Buildings, which front the Cut, would be 13m.

160. With regard to the separation distance to the adjacent Styles House to the west which has balconies and windows which face the site, a minimum 17m would be maintained between the closest windows increasing to 20m with more recessed apartments fronting The Cut.

161. It is noted that there would be a close relationship between the proposed PBSA Building and Residential Building where the respective facades would be

separated by a minimum of 9m. However, the layout and design of Residential Building has ensured that windows facing Joan Street are associated with bedrooms and/or dual aspect living rooms and are also recessed into the façade to minimise privacy impacts with the proposed PBSA rooms which also face Joan Street.

162. Given the distances involved, being above the required 12m as set out Design Standards SPD, and given new windows facing Joan Street have been sensitively located and designed, it is considered that any increased overlooking or loss of privacy as a result of the proposed development would be minimal.
163. The proposed development would therefore have an acceptable impact upon the living conditions of the adjacent properties with regards privacy and overlooking.

Noise and vibration

Plant Noise

164. Plant (power, heating and cooling machinery) would be contained within six rooms on the ground floor level of the Residential Building and five rooms at the basement level, two rooms at the ground floor level and three rooms at the first-floor level of the PBSA Building.
165. A noise and vibration report was submitted with the Application demonstrating that noise emissions from plant rooms will make no contribution to the existing background noise levels on the site.
166. Notwithstanding, 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.

People noise and disturbance

167. It is noted that some of the objections received, mention the potential impact from the increased number of people on the site. While there would be more activity from people, the Applicant's Noise Assessment notes high background noise levels principally associated with the proximity of the site to the railway lines to the north and highway to the south. In addition, the Student Management Plan references that the operator would maintain continual presence on site to work with the public and students to make sure there is harmonious co-existence. Through the legal agreement, a more substantive management plan would be required for approval, detailing how the student accommodation would be managed to limit impact on neighbours, the code of conduct students would need to adhere to, how neighbours can complain if they are disturbed and what action would be taken.

Vibration

168. A condition is recommended requiring an assessment of vibration and reradiated 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 adjoining 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.

Public Realm

169. London Plan Policy D8 states that development proposals should encourage and explore opportunities to create new public realm where appropriate and ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable.

170. SP Policy P13 (Design of places) requires proposals to ensure buildings and spaces are well-positioned for their function and use. High-quality public realms that encourage walking, cycling, and are safe and attractive are essential, along with appropriate landscaping and green infrastructure. The policy also mandates inclusive design accessible to all ages and disabilities, formal and informal play opportunities, and adequate outdoor seating.

171. Site allocation NSP20 (Southwark Station and 1 Joan Street) of the Southwark Plan (2022) requires redevelopment of the site to provide an enhanced accessible tube station, including public realm improvements.

172. The proposed development includes a range of public realm amenity improvement works, designed to enhance the overall aesthetic and functionality of the site. One of the key elements is the retention of Joan Street and road improvements which include retaining the full extent of the public highway but narrowing the vehicular element to a single north bound carriageway and widening the pavements to a minimum 2.5m on each side. Along with enlarged crossings at the southern and northern ends, this will improve pedestrian movements by connecting the two sides of Isabella Street and The Cut. The remainder of Joan Street is proposed to be resurfaced to accommodate designated bays for service vehicles. Joan Street was due to be built over in the consented office proposals and its retention is considered a positive aspect of this new scheme.

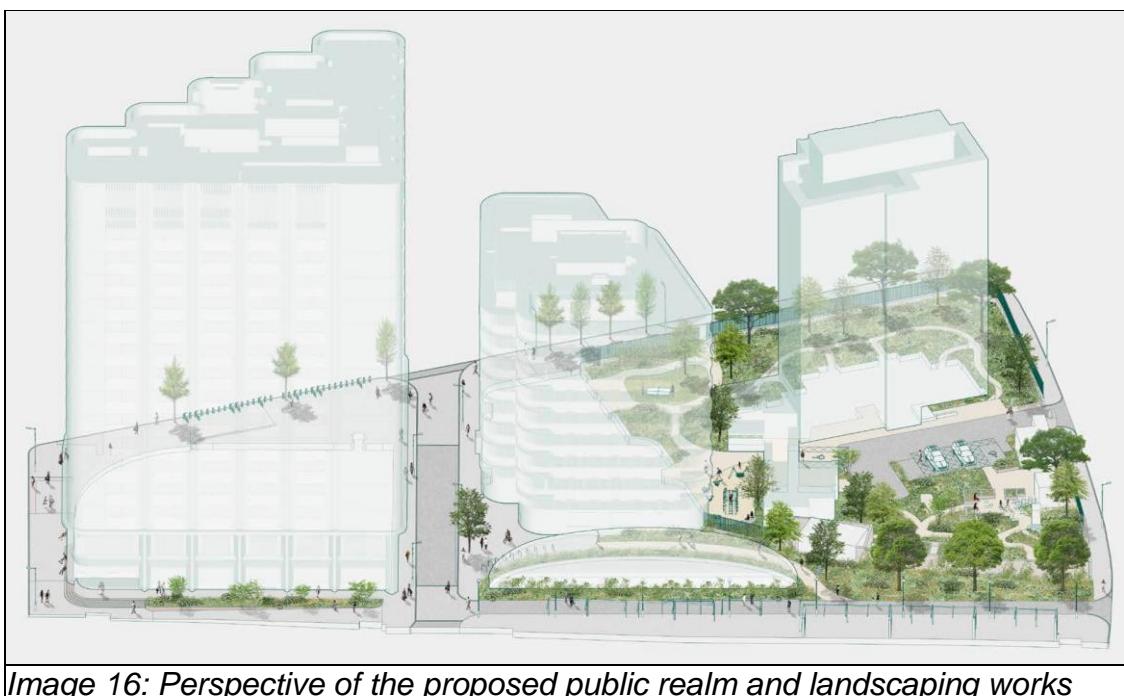


Image 16: Perspective of the proposed public realm and landscaping works

- 173. The development also seeks to reinforce the existing planting along the western part of Isabella Street, with increased greening around the 'Eyelid' and denser planting under the existing trees between Isabella Street and Styles House. In addition, soft landscaping is introduced into the eastern part of Isabella Street within a new planter running most of the length of the PBSA building, to further improve urban greening and consolidate the level difference between Joan Street and the top of the Station 'box' and Blackfriars Road.
- 174. In addition to the onsite landscaping, new gardens and pathways are proposed within the southern two thirds of the space between Styles House and the new residential building. This will provide an opportunity for spill out space from the community facility. The northern part of this land between the existing TMO office and the new residential building is proposed to become a children's play area with the provision of new play equipment. An indicative lighting strategy has also been provided with the Application to ensure good visibility and safety for pedestrians and cyclists along routes and in public spaces, whilst also ensuring minimal disturbance to residents living in the surrounding buildings.
- 175. In total, the Proposed Development will deliver 2,309sqm of publicly accessible space. This will provide a high quality well-connected, green place which promotes pedestrian movement, a sense of safety and security and a much-improved sense of place in accordance with SP Policy P13 and the requirements of Site allocation NSP20.

Children's play space

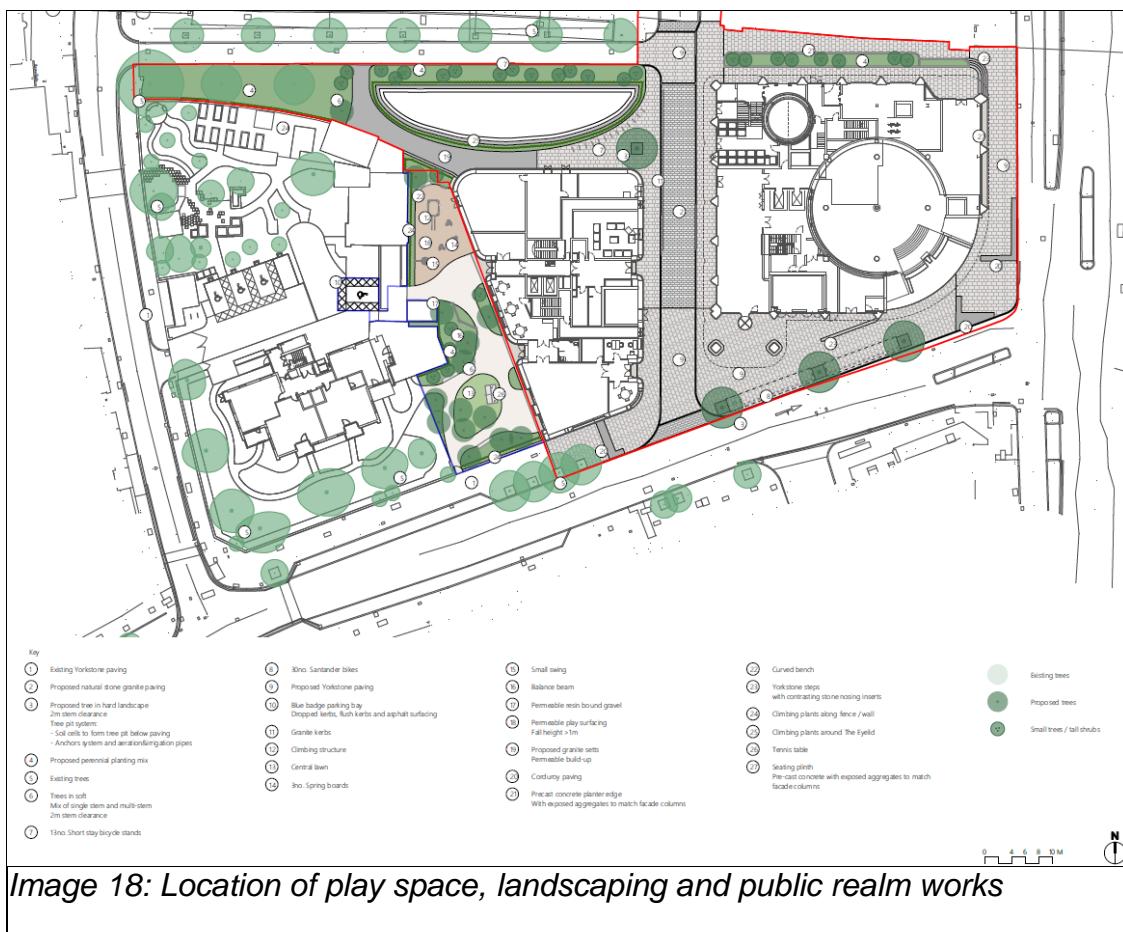
- 176. London Plan Policy S4 (Play and informal recreation) requires developments to enhance play opportunities and independent mobility for children, ensuring residential developments provide at least 10 square metres of good-quality, accessible play space per child. Play space should be stimulating, safe,

integrated into the neighbourhood, incorporate greenery, be under passive surveillance, and not segregated by tenure.

177. The proposed development includes the provision of 516.8sqm of children's play space located to the west of the Residential Building, within the shared community garden of Styles House. The playground features a variety of equipment for children of all ages to respond to various 'courage levels' and offers a range of experiences for calm or daring children. In terms of treatments and surfacing, a wet pour is specified for the required fall heights and will have an undulating terrain in a variety of colours. The provision of play space is located in a secure area of the Styles House garden, will be well-lit and overlooked, and will feature a seating area for parents and carers. The play space should also provide for wet play, and this could be through the provision of something as simple as a tap in order to contain maintenance costs. The details of the play space will be secured by condition to ensure the aspirations illustrated below are delivered. As such, it is considered that the play space is appropriate for the site and will ensure that families are able to access this space safely and children able to enjoy a high quality and imaginative space.



Image 17: Visual representation of proposed play space



178. The quantum of play space provision is shown in the table below calculated using the GLA Playspace Calculator under LP Policy S4.

Age Group	Policy Requirement (sqm)	GIA Proposed (sqm)
Ages 0 – 4	204.9	204.9
Ages 5 – 11	168.9	168.9
Ages 12 – 15	93.9	143
Ages 16 & 17	49.4	
Total	516.8	516.8

Table 4: Play space requirement and provision

179. The Proposed Development will provide a policy-compliant level of play space on-site for 0 – 17 years as demonstrated in the table above and will deliver a total of 516.8sqm of high quality play space, as required under LP Policy S4.

Urban Design and Heritage

180. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a Conservation Area and its setting and to pay “special regard to the desirability of preserving or enhancing the character or appearance of that area”. Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to have “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”.

181. The NPPF (2024) provides guidance on how these tests are applied, referring in paras 212-215 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 216 goes on to advise taking into account the direct and indirect effects of a scheme on the significance of a non-designated heritage asset. This would include locally listed buildings.
182. The planning submission includes a Heritage and Townscape Visual Impact assessment (HTVIA, September 2024) that provides verified images of the development when viewed from 15 locations in and around the Blackfriars Road.
183. In general, despite being approximately 30m and 55m in height, the proposed tall buildings are less widely visible than the heights suggest. This is partly because of the tight urban grain within the area and the presence of other large and tall buildings within the Blackfriars Road and vicinity of the site that often mask the development from wider views. Nonetheless, the building does remain visible in a number of nearby and middle-distance views, particularly along Blackfriars Road and where local roads axially align with the site, where it sits within the settings of a number of designated heritage assets.

Impacts on conservation area

184. The site is not within a conservation area. However, there are several conservation areas within the wider area. They include the Valentine's Place conservation area, which is 185m to the south of the site at its nearest point; and the King's Bench, which is 200m to the southeast, both of which are in the LB Southwark. Those of LB Lambeth are closer by, comprising the Roupell Street conservation area, which lies 110m to the northwest; and the Mitre Road and Ufford Street conservation area, which is 180m to the southwest.
185. Beginning with the LB Southwark conservation areas, the Valentine's Place conservation area features a tight urban form, comprising narrow roadways and closely spaced four and five-storey residential and former warehouse/ industrial buildings. This form and general alignment of its streets that angles southwest-northeast to one side of the site is likely to result in no or only marginal visibility of the development, preserving its setting.
186. Not dissimilarly, the King's Bench conservation area is defined by modest-height, mansion blocks and former industrial buildings set at the back edge of the pavement within narrow streets. In this instance, however, the street pattern runs southeast-northwest towards the site. Pakeman House in Pocock Street will mostly screen the development from views within the conservation area, although the upper floors and crown of the PBSA buildings will likely be visible above its roofline in the backdrop when viewed along the full length of Rushworth Street and King's Bench Street (see View 10). However, it will sit in front of

Columbo House, whose uppermost floors are presently seen in the view, obscuring the 1960s commercial tower and terminating the vista with a building of improved elevational architecture and engaging roofline. The effect will be moderately beneficial to the townscape and setting of the conservation area.



Image 19: View 10 (Webber Street / Rushworth Street)

187. View 12 of the HTVIA shows the effect on the Mitre Road and Ufford Street conservation area in LB Lambeth. The street and wider conservation area are characterised by terraces of three-storey period houses in London stock with stucco detailing that make for a coherent and appealing domestic townscape. The affordable housing block would remain hidden from view below the ridgeline in this view, although the taller PBSA building would be seen, briefly popping into view among the chimneys. The stepping form and light material finish of its crown would minimise its visual affect, while its appearance will be modest compared to other buildings within the backdrop, including Southwark College and Palestra. As such, the impact on the setting would be neutral.



Image 20: View 12 (Webber Street / Mitre Road)

188. No views are presented from the Roupell Street conservation area, which is primarily residential in character and dates from the late 18th/early 19th century. It is generally low-rise in scale, but contains a mix of building types, including terraced housing, converted warehouses and philanthropic mansion blocks, and is mainly east-west in orientation. There is likely to be views of the development at its eastern end onto Hatfields and of both buildings, although they will be read within the context of Styles House and Colombo House, which are similarly scaled to the affordable housing block and PBSA block, respectively. As such, where glimpsed, the outcome is likely to be neutral.

Impacts on listed buildings and structures

189. The site does not contain any listed buildings or structures (see below). However, it is within the vicinity of a number of heritage assets, with the HTVIA recording some 38 listed buildings and structures within a 350m radius of the site. The most notable and highly rated of these are the Grade II* heritage assets of the Old Vic Theatre (LB Lambeth), some 320m to the southwest; the Kirkaldy Testing Building, a similar distance to the northeast; and the obelisk at St George's Circus, some 560m to the south.

190. The development would be seen to one side of the Old Vic Theatre, across the street, when viewed from Waterloo Road. It would be read in the distance within the context of Styles House and Colombo House, which are similarly scaled to the affordable housing block and PBSA block, respectively. The scheme would have a neutral impact on its setting, as reflected in similar view from outside the theatre (view 15).



Image 21: View 15 (The Cut, looking east from outside the Old Vic)

191. Regarding the Kirkaldy Test building, the development would be unlikely to appear within the backdrop to the building, given the intervening distance and the scale and position of the listed mid-terrace building. It would, however, be visible when viewed from the obelisk at the centre of St George's Circus, as illustrated in view 5. It would sit slightly above its immediate neighbours on the west side of Blackfriars Road but appear no taller than the buildings that line the street in the foreground of this vista and would have a neutral impact on the setting of the listed structure.



Image 22: View 5 (St Georges Circus Obelisk, looking N along Blackfriars Road)

192. Regarding the Grade II listed buildings and structures, they include:

- 1-18 Aquinas Street
- Christ Church, 74, 75-78, 81-83 and 85-86, 176, and the Peabody Estate in Blackfriars Road
- Clandon House and Albury House in the Boyfield Street Estate
- 22, 23 and 25 Cornwall Road
- Rochester House in Dolben Street
- Drapers Almshouses in Glasshill Street
- 15-17 Hatfields
- 67 Hopton Street
- Blackfriars settlement (44-47) Nelson Square
- Former Clay's Printing Works, Paris Gardens
- The Kings Arms Public House; St Andrew's House; St Andrew's and St John's CoE Primary School; 1-23, 43-61, 73, 26-42 and 62-72 Roupell Street
- Rushworth Street Estate (Chadwick, Ripley, Merrow Buildings)
- Royal National Theatre Studio (83-101) the Cut
- 1-29 Theed Street, and
- 5-21, 23, 37, 2-18 and 20-30 Whittlesey Street.

193. Of these, the closest are the groups of terraced houses along Blackfriars Road (Nos. 74, 75-78, 81-83 and 85-86), which are late 18th and early 19th century remnants from when Blackfriars Road was first laid out, and the Former Sons of Temperance Friendly Society Building' (No. 176) opposite. They sit between 25m

and 125m to the south of the site. View 17 shows the listed terrace lining the west side of the main road, running towards the railway viaduct, with Colombo House rising above its roofline. The increase in building scale along Blackfriars Road beyond the viaduct is evident.



Image 23: View 17 (Blackfriars Road, N of Surrey Row)

194. The proposed PBSA would be seen above the latter half of the terrace, with its light material finishes and undulating bay facades. Its appearance is emphatic but would be softened to an extent by the avenue of mature street trees that would partly obscure its appearance when in leaf. It adds interest and legibility to the townscape, denoting the Cut and underground station. The presence of Colombo House and other tall buildings within the immediate context tempers its impact on the setting of the terrace, which causes less than substantial harm to the heritage settings and of a low order. This harm is no more impactful than that caused by the extent office scheme. Furthermore, it is more than offset by the townscape benefits of a well-designed development that completes the street block and brings welcome legibility to an important nodal point.
195. In other instances, the development is orientated away from the listed building or at sufficient distance and read alongside Colombo House and Palestra not to cause any undue harm to the settings of the listed buildings. Examples illustrated in the HTVIA include the Royal National Theatre studio in the Cut (view 15) and the Ripley Building in Rushworth Street (view 10). Overall, the development would preserve the settings of these buildings.
196. Lastly, in terms of heritage, there are several locally listed buildings within the vicinity of the site within Southwark, the nearest being: the railway viaduct onto Blackfriars Road with its traditional painted signage; the 1930s Southbank

Telephone Exchange in Hatfields; the Albert Institute, Baths and Washhouse in Chancel Street; the White Hart public House in bear Lane; the screen wall to the Grand Vitesse Depot in Great Suffolk Street; the Embassy Tea House at 195-205 union Street; 107 Boundary Row; and the Crown public house at 108 Blackfriars Road. In Lambeth, the Hope and Anchor public house and Windmill public house and Tait House in Greet Street are also locally listed. In most instances the intervisibility is limited and/ or of negligible consequence, particularly given the urban context, and as such the settings are preserved.

Heritage status of underground station

197. As referenced above, presently the site does not contain any heritage assets. However, officers are aware that Southwark Underground Station is currently being assessed by Historic England for statutory listing, the Council and scheme architects having been notified of the process in August 2024.
198. In response to the current planning application, Historic England confirmed in its consultation response letter of 7 November 2024 that it did not wish to raise any significant concerns regarding the impact of the proposals on other heritage assets and advised that the council seek the views of its Conservation officers in determining the application. However, it noted the alterations to the underground station and that its views of the proposals could change, depending on the outcome of listing process. It is understood that Historic England is presently concluding its assessment of whether the station should be listed for reporting to the Department of Culture, Media and Sport for decision-making.
199. It is notable that should the station become statutory listed, the development proposals or any subsequent amendments would require the submission and approval of a listed building consent application. Historic England would be consulted as part of this process, allowing its consideration of the direct heritage impacts of the alterations.
200. It is also noted that Twentieth Century Society have submitted a consultation response to the current application which is referenced and discussed at the end of this report and would be consulted as part of any listed building application process, should the need arise.

Height, form and massing

201. Policy P13 (Design of Places) sets out that development must "ensure height, scale, massing and arrangement respond positively to the existing townscape, character and context".
202. Policy P14 (Design Quality) sets out that development must provide "High standards of design including building fabric, function and composition" and "Innovative design solutions that are specific to the site's historic context, topography and constraints".
203. Beginning with the affordable housing, the residential building is broadly a

trapezoid in its footprint, slightly narrower at its southern end onto The Cut and broadening towards its northern end; shaped to align with Joan Street and to optimise space towards the rear, while maintaining a reasonable distance from Styles House for good amenity. The new building is nine storeys above grade with an additional level setback plant, with an overall height of 33m above pavement level and a rooftop parapet level just over 30m. It sits slightly lower than the 11-storey Styles House, which is 33m to parapet and 36m overall; the new building benefitting from improved floor-to-ceiling heights. The relatively marginal difference in height ensures that the new building sits well with its immediate neighbour.

204. In addition, the building features an eight-storey shoulder height, approximately 27m at its southern end, which is welcome in stepping the building down towards The Cut and to a broader context of four to six storey buildings, easing its wider townscape fit. This is assisted by the design's rounded corners, strong horizontality and cut-away corner balconies, which articulate and soften the built form.
205. By contrast, the proposed student housing block has a more orthogonal triangular footprint, mainly necessitated by loading capacities of the station, but which offers the opportunity for a building of landmark quality, highlighting the underground entrance. The building presents its main bulk onto Joan Street and the railway viaduct, with its flatter elevations making for a coherent street form. Its massing towards the front curves to form a single storey plinth that complements the station below and doubles as a load transfer deck, while the main bulk of the building above runs broadly diagonal across the plinth, with its east-facing elevation set well back from the station's corner entrance. The effect is to bring a stronger presence to the otherwise underwhelming station entrance, while easing the sense of scale of the new building onto Blackfriars Road.
206. In terms of height, the student block is 15-storeys above grade, including the station, but with the base of the building read over two storeys. At just under 59m at its maximum (52.3m AoD), the new building sits moderately taller than the Palestra Building opposite (44m to parapet), although the large scale and cantilevered form of the latter will continue to dominate the townscape within this part of the Blackfriars Road. The new height, however, is similar to Colombo House that neighbours to the north, immediately beyond the railway viaduct, and which is 56m to parapet and 58m overall. As such, the new development will form part of a cluster of buildings on Blackfriars Road at its junction with The Cut and railway viaduct.
207. A notable feature of the design, however, is the building's articulation towards Blackfriars Road and The Cut, with the massing set back and folded into a series of rounded vertical bays that work well to give a strong vertical emphasis and slender proportion to the building, as well as soften its form. This lends an elegance and strong visual interest to the design, and establishes a language of soft, rounded corners shared with the affordable housing block and a wider architectural dialogue with the more curved built forms of Tait House and Benson

House in Hatfields, beyond.

208. Lastly, the parapets of the five bays evenly cascade in height by 780mm from the outer bay onto the Blackfriars Road (adjacent to the viaduct) down to approximately 55m for the outer bay onto The Cut. The design is clever, exaggerating the bay form and adding a distinctive roofline and crown to the building that falls in height, reflecting the urban hierarchy of the major thoroughfare and main road. The parapet remains consistent in height along the building's north (railway-side) elevation, presenting a more orderly roofline, before cascading north-south in seven even steps on the building's west (Joan Street) elevation in a more subtle manner. Overall, the scale is well-considered, responding well to the structural limitations of the host building and to the local townscape context and its opportunity for height and landmarking.

Tall building matters

209. At 33m and 59m above grade, both the Residential Building and PBSA Building are regarded as a tall building for the purposes of P17 of the Southwark Plan and Policy D2 of the London Plan.

210. Briefly running through the policy requirements for new tall buildings, in terms of general location, the development is within the Central Activities Zone and the Borough, Bankside and London Bridge Opportunity Area, which are considered generally suitable for tall buildings. The site is an Allocated Site (NSP20) that specifies the opportunity for a taller rather than tall building. However, the extant permission for the 17-storey commercial building on the site is a key consideration, as is Policy D3 of the London Plan, which seeks to optimise the capacity of underutilised brownfield sites through a design-led approach that can include a tall building, where appropriate.

211. In terms of the specific location, the development readily complies with Policy 17.2, Part 1 of the Southwark Plan, being at a point of landmark significance: The site is located on the junction of a major arterial route into Central London and important east-west route linking London Bridge with Waterloo. The taller of the two buildings sits directly above Southwark Underground Station, which is on the Jubilee Line and is an interchange for Waterloo East suburban rail services. They would also form part of a small, loose cluster of tall buildings in the vicinity.

212. The proposed heights are considered proportionate to the significance of the location, with the lower residential building sitting slightly below the height of neighbouring Styles House and stepping down in massing towards the more modest building scales within The Cut, which is a district shopping centre; while the tallest of the pair sits above the station itself, stepping in height onto the wide boulevard of Blackfriars Road. Both buildings are relatively moderate in height as tall buildings, with neither dominating the urban context nor appear overbearing within the streetscape. That said, the building silhouettes of the proposed buildings will be distinctive, with the bay form and stepped crown of the student tower making a particularly positive contribution to the skyline, easily

recognised and adding legibility to the station below, albeit more on a district rather than strategic perspective.

213. It is also of note that each of the proposed buildings are not as tall as the extant planning permissions for the office and residential buildings, respectively.
214. Importantly, the site is not within the protected strategic views of St Paul's Cathedral or the Palace of Westminster or their backdrops, and similarly not within any of the Borough Views. The development would be occasionally glimpsed within the designated riverside prospects, as set out in the LVMF framework, but would not be of a size or appearance to cause any harmful disruption to the protected views.



Image 24: View 1 (LVMF 15B.1 Waterloo Bridge: The Downstream Pavement)

215. In terms of the local townscape, the development would make a highly positive contribution to the local context, not only in finally resolving an underwhelming street corner on an important road junction, but also in providing two buildings of an appealing architecture that will add to the sense of place. In particular, the design for the student tower is a well-crafted and distinctive response to the site's specific conditions and constraints that would frame the street corner and provide greater legibility.
216. It would also deliver a widened pavement onto this section of The Cut, as well as onto Joan Street at the rear, the latter redesigned more as a shared highway space. In addition, the public realm around the Eyelid will be re-landscaped as gardens with a public pathway, optimising its amenity for those working or visiting the immediate area or connecting through to Isabella Street and Hatfields. As such, the proposed public realm improvements are considered commensurate

with the scale of development.

217. The scheme may not provide for new publicly accessible space at or near the top of the two buildings. However, the designs do provide a replacement community hall at the base of the residential building and new communal student amenity rooms at the base of the new PBSA tower, as well as throughout its upper floors, which is considered a more appropriate response, and as such satisfies the policy requirements.
218. The architectural and functional qualities of the development are high and, depending on the delivery of the proposed detailing and material finishes likely to be of exemplary standard. The massing and profiling of the buildings have an appealing fluidity and good secondary scale, with an evident rhythm and order to the elevations and clear sense of base, middle and top. They work well as a pair, while the PBSA works well to deliver a notable corner building. Their positioning and design are confirmed as not causing any undue environmental effects, with no harmful overshadowing of neighbouring properties or downdrafts.
219. The site layout and design of the buildings' ground floors ensure a positive relationship with the public realm, with the delivery of widened and relandscaped public space, new street tree planting, good connectivity. The adjoining public realm is well-animated and overlooked by the buildings' ground floor uses, with the corner retail use onto the Low-line and the large window of the community hall onto The Cut particularly welcome, satisfying policy requirements.
220. Wider afield, views 1 and 3 indicate that while the development would be visible in the protected riverside panoramas downstream from Waterloo Bridge (LVMF 15B.1) and from Cleopatra's Needle on Victoria Embankment (LVMF 20B.1), it would be glimpsed in the distant background only, with negligible impact on the views, particularly given the scale and character of buildings along the Southbank.

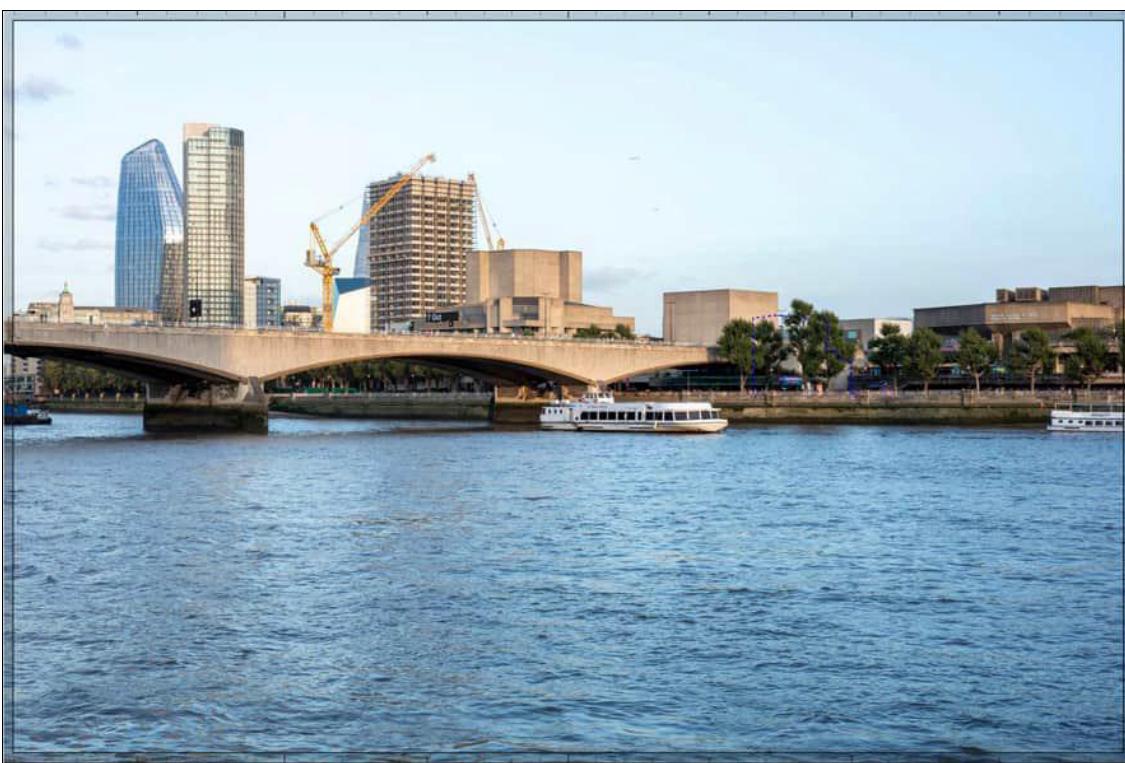


Image 25: View 1 (LVMF 20B.1 Victoria Embankment: At Cleopatra's Needle)

221. Regarding the local townscape in general, and particularly outside of the conservation areas, the scheme makes a highly positive contribution to the street scene. The development provides two new attractively designed buildings that would add a strong sense of place to the townscape. In particular, the PBSA building would work well, filling the street corner and completing the urban block with a highly engaging architecture, while meeting the structural challenges of building above Southwark Station. It would bring a landmark quality to the site and a much-needed legibility to Southwark station, which presently appears distinctly underwhelming within its urban context. This is well illustrated in view 9, eastwards along the Cut; view 17, northwards along Blackfriars Road; and view 19, southwards along the Blackfriars Road, becoming more effective closer to the junction, where the new building would offer a more elegant foil to the rather formidable Palestra building opposite.



Image 26: View 9 (The Cut / Greet Street)

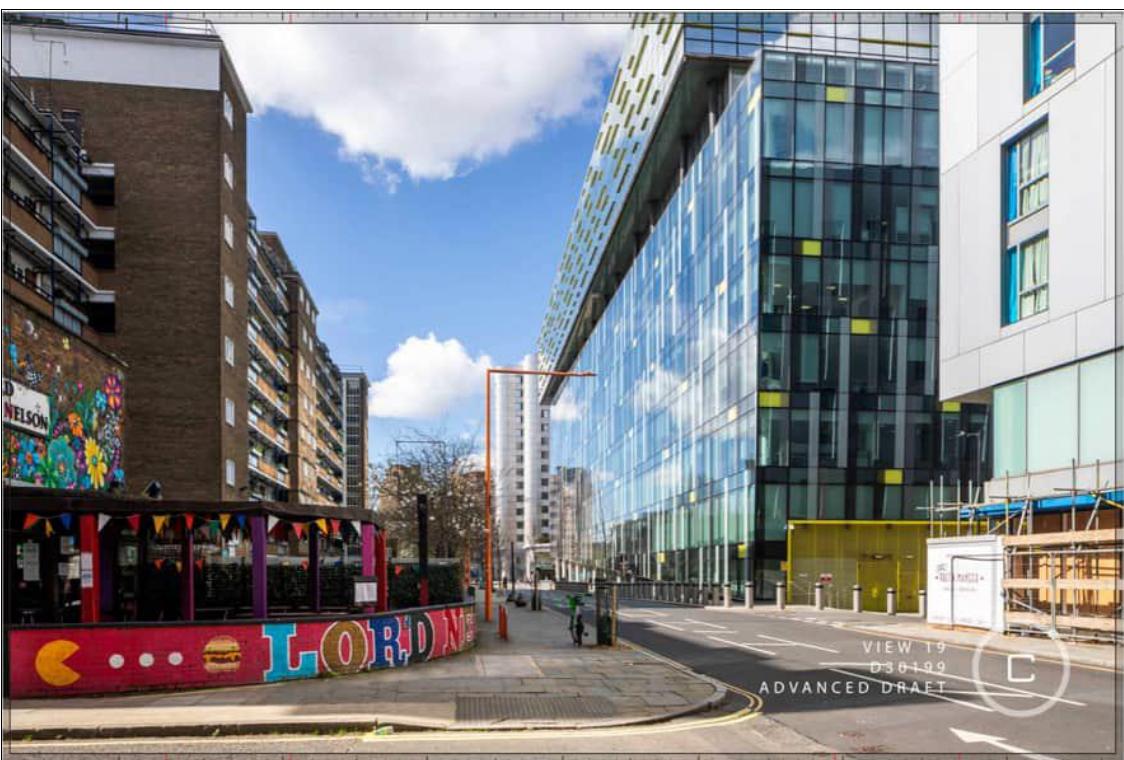


Image 27: View 19 (Union Street / Nelson Street)

222. Overall, the proposals satisfy the criteria for a tall building development. Regarding the London Plan, the criteria for its tall building policy (D2) are not dissimilar to those of Southwark Plan policy P17 regarding the architecture and urban design quality, and therefore a similar conclusion for policy D2 is reached. The remaining factors are functional, relating to safety, transport capacity, servicing, employment and construction which are discussed elsewhere in this

report.

Architectural detailing

- 223. Policy P13 (Design of Places) sets out that development must "better reveal local distinctiveness and architectural character; and conserve and enhance the significance of the local historic environment".
- 224. Policy P14 (Design quality) sets out that development must provide "high standards of design including building fabric, function and composition".
- 225. The proposed designs are of a high architectural quality both in terms of building functionality and aesthetic quality. Looking at the residential building, the 44 new homes are well-arranged, with a far more efficient floorplan than the previously consented scheme. Each floor provides for the most part six flats per floor, with good sized units and layouts that achieve dual-aspect for just over 80%, with the remainder still enjoying enhanced single-aspect that is not north-facing. With good floor-to-ceiling heights of 2.5m for habitable rooms and all flats with access to private balcony spaces, the accommodation is well-appointed. In addition, the residents will have direct access from the foyer to the communal gardens at the rear, as well as the benefit of the community hall. The community hall is well-lit, multi-purpose space with a separate smaller meeting room and dedicated amenities and has direct access through b-folding doors to a small courtyard garden space at the rear.
- 226. Looking at the new student block, the layout provides 34 studio rooms per floor, each with an en-suite bathroom and kitchenette facility. The 429 rooms are well-sized, with a mix of small, medium and large studios, and benefit from residential-standard ceiling heights and fixed windows with operable side panels for ventilation. The corridors are reasonably short in length at 30m and feature end windows, providing natural daylight. The students have access to communal amenity spaces on all floors, which are cleverly designed as double-height spaces, with mezzanine floors, providing an opportunity for a variety of social spaces (e.g., gym, co-working, events space, winter gardens). The students also have access to laundry facilities and off-street cycle parking. Lastly, while the retail units are modest in size, they benefit from good internal ceiling heights and extensively glazed frontages.
- 227. Regarding the elevational designs, the buildings share a distinct architectural language of soft building corners and curved recesses, highlighted by ribbed material profiles that are used to create a strong horizontal expression for the residential block and contrasting strong vertical expression for the student block. The language is especially effective on the taller student block, where it works well to emphasize the receding line of five curving vertical bays across the building's elevations onto The Cut and Blackfriars Road. It also works well on the building's fuller north and west elevations, where a gentle inward curving detail is introduced between pairs of windows, articulating the elevations into a series of vertical piers and subtle bays and providing a coherent elevational architecture to the building. Initial bay studies showing the detailing of the elevations have

been included as part of the application submission for reassurance. Nonetheless, the final details of the elevational designs should be confirmed by condition to maintain the design intent and its high quality of finishes during the scheme's progression to full construction details.

228. The designs have an Art Deco style, which is complemented by the treatment of the ground floors in stone or precast stone with a heavy, robust quality, and by the lighter tonal finishes of the upper floors. The use of a consistent tonal palette further unifies the designs, allowing the two buildings to read as a pair. For the residential this comprises a mix of greys and cream tones for the elevation, with verdi gris metalwork for the doors, window frames, window reveals and balcony walls. The concern is that a sufficiently high quality of materials is used for the elevations that avoids the use of render and GRC, though this can be confirmed by condition. Similar colours are used for the student building but using a mix of precast stone and terracotta for the elevational finishes, which bring a robust, high quality to the elevations and a richness of material finishes that have a strong aesthetic quality and speak to the traditional glazed ceramic finishes of London Underground stations, as well as the attractively glazed terracotta building at no.209-215 Blackfriars Road. Overall, the architectural design of the proposed eloement is considered to be high quality.

Access and site layout

229. As mentioned above, the scheme presents as two new buildings: A 15-storey PBSA building, with basement and additional roof plant and that includes two small retail shops; and a part 8 / 9-storey residential building that includes a ground floor community hall. The student block is located towards the front of the site, sitting directly above the station as an over-station development. It grounds on either side of the station entrance, where it provides two new retail units; and to the rear, where it contains a large student foyer and communal amenity space.

230. Joan Street is retained as a public route, maintaining local connectivity and supporting good site permeability, with connections to the Low-line route and Hatfields. The new housing block sits immediately west of Joan Street. It fronts directly onto the pavement and backs onto the existing housing estate, its communal outdoor space combining with the estate's existing gardens.

231. Separating the two main uses into two buildings that sit either side of Joan Street Works well to support good amenity, with the more intensive student housing facing towards the busier Blackfriars Road. The layout effectively completes two small urban blocks, with the ground floors activating the adjoining public realm. Importantly, the layout maintains clear sight of corner public entrance to the underground station, which is uncluttered by the development, acknowledging its focal role within the townscape. Retail units sit alongside the entrance, further enlivening the building's main frontages. The new retail unit on the building's northeast corner returns briefly onto the passageway that runs between the viaduct and new building, providing welcome activation and good informal surveillance along this stretch of the Low-line. The main student entrance is

located towards the building's southeast corner and presents as a slight undercut in the building and with a projecting canopy. It is also supported by a widened pavement and should provide good activation onto The Cut. The building's servicing bay is arranged on the quieter northeast corner of the building accessed from Joan Street.

- 232. The entrance to the residential block fronts onto Joan Street, activating the local road. The entrance foyer is double-fronted, offering residents direct access to the rear gardens and estate. The community hall is similarly access from Joan Street, as well as enjoys a connection through to the rear gardens, providing the opportunity for spill out space. The community hall wraps round onto The Cut where it features a large picture window, animating the local street scene and supporting good legibility for the communal space.
- 233. Lastly, the new buildings themselves are well positioned within the development plot, with their footprints and massing in good alignment with the wider building context, comfortably framing the adjacent streets and spaces. The extent of public realm remains unchanged onto Blackfriars Road, while a generous pavement is provided onto The Cut. Joan Street retains its narrower, more intimate character, but with the buildings sufficiently setback to align with the pedestrian underpasses through the viaduct. Overall, the layout and arrangement of uses make for a high quality of urban design.

Southwark Design Review Panel (DRP)

- 234. Finally, the proposals were considered by the Council's DRP at the pre-application stage in April 2024. The panel acknowledged the significant constraints of delivering a development above an existing station and generally supported the urban design approach for the site, recognising the opportunity for a prominent corner building and of landmark scale. It also welcomed the retention of Joan Street. It did, however, question the detailed ground floor layouts, highlighting the small, inset residential entrances, the inefficiency of having separate entrances for affordable and intermediate housing, and the need to activate the northeast corner of the site. It also considered the landscaping around the 'eyelid' fractured and lacking sufficient purpose.
- 235. The DRP did not have a problem with the scale of development and considered the articulation of the massing of the student building to be engaging. It nonetheless thought the massing and detailed architecture needed further progress, highlighting the north and west elevations of the student building, as well as the abrupt appearance of its crown. It thought the designs of the two buildings could do more to relate to each other. It did, however, welcome the use of terracotta, being high quality finish.
- 236. The scheme architects took on board the findings of the DRP in progressing the designs, assisted by the wider decision to make the residential building all affordable social homes. The main entrances to the residential foyer and community hall, and to the student foyer were more emphatically expressed, and

a retail unit added to the northeast corner of the site. The massing was further refined, and the elevational detailing progressed, with closer attention paid to the north and west elevations and to the crown of the student block, including exploring a range of stepped parapets. Lastly, the landscaping was revisited, with a simplification of pathways and planting beds, although a key change has been the amalgamation of landscaping with the adjoining estate.

Design conclusion

237. The application scheme is a design-led proposal for a large mix-use development, providing two new tall buildings on an underused site of landmark importance, being located on the junction of Blackfriars Road and The Cut / Union Street and containing Southwark underground station. The development is for social rent housing and PBSA and includes a replacement community hall and new retail. The site has the benefit of an extant consent for a large, tall office building that covers both plots and results in the closure of Joan Street. The revised scheme is well-considered and engaging in terms of its architecture and urban design, and in its response to a challenging brief for building above the underground station, which is to remain operational during construction works.

238. The development has a finer grain of urban form that retains Joan Street as a public route, providing good permeability, and connects well with Isabella Street and the Low line. It offers ground floor layouts and uses that activate and animate the adjacent public realm and building forms that frame the streets in an appropriate manner. Its architecture is of high quality, both aesthetically and functionally, providing well-designed homes and student accommodation in attractive buildings and with a strong sense of place. As tall buildings, the design quality is exemplary, subject to conditions ensuring the design intent and material finishes that should be of similar high quality for both buildings. The PBSA is notable for its particularly engaging quality, driven in part by the structural limitations, and cleverly designed to bring an elegance of tall slender, stepped bays that should deliver a building of landmark quality.

239. Overall, the development makes a highly positive contribution to the townscape and preserves the settings of heritage assets, with its design and public realm improvements more than offsetting the less than substantial harm to the nearby Grade II listed terraced housing in Blackfriars Road. As such, it is considered that the proposed scheme complies with the Southwark Plan and London Plan policies with regard to good design, tall buildings and heritage.

Landscaping and trees

240. The proposed development has been designed to retain all trees on site and maximise planting and green space across the site. A total of 19 new trees are proposed, in addition to shrubs, grasses and perennials along Isabella Street, the Eyelid. Further greening is proposed to the canopy above the station entrance which is to be landscaped with new planting and green roofs. Furthermore, the proposal includes a new shared community garden for both existing and new residents on the land between Styles House and the proposed

Residential Building which will be secured with the s106 Agreement.

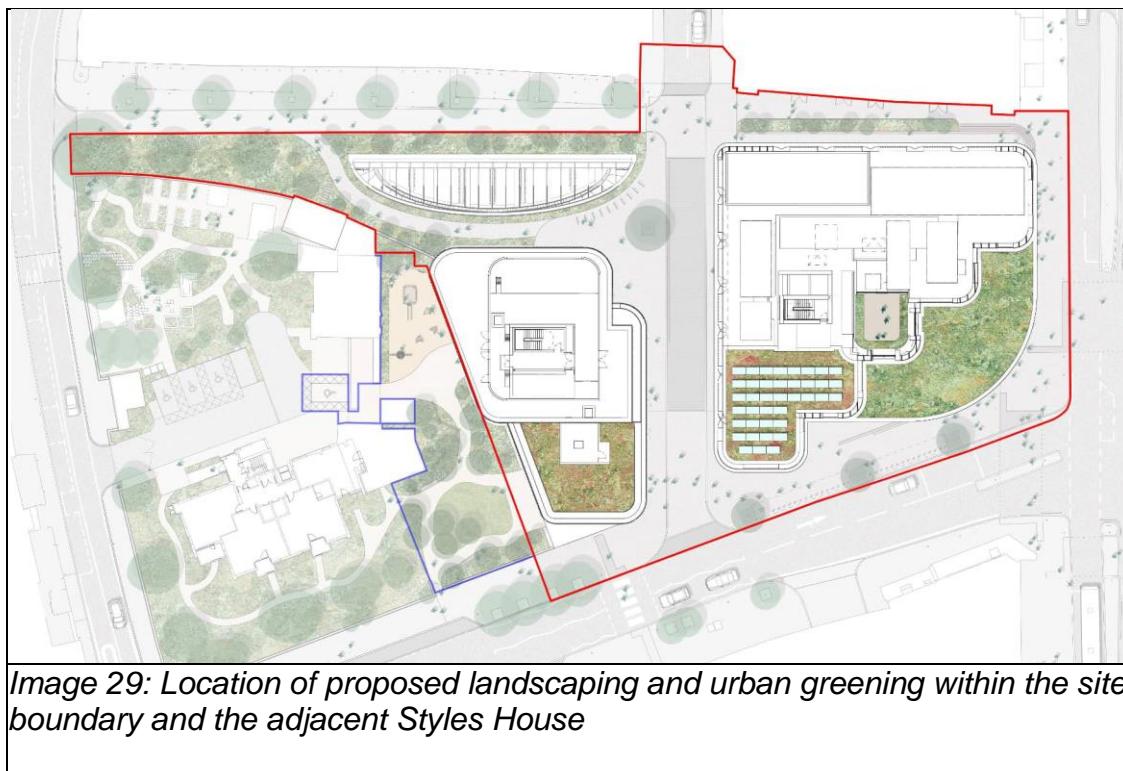
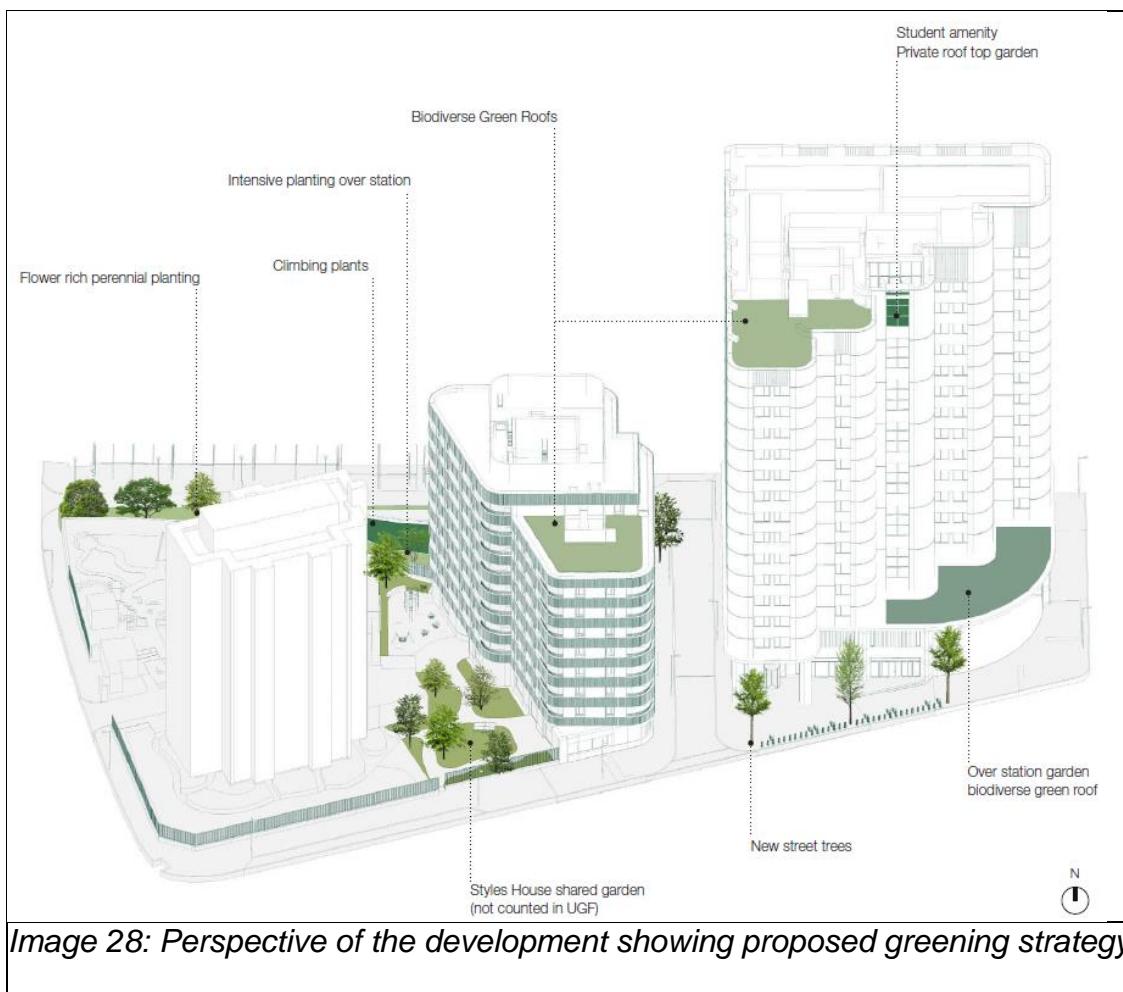
241. Planting has been specifically selected to ensure seasonal resilience, particularly for their long-lasting flowering periods and attractive seed heads and foliage that can be maintained throughout the winter season. A mix of native and non-native plants perennials are proposed which will attract pollinators and invertebrates to boost local ecology.
242. Overall, the proposed development includes the retention of high-quality trees and extensive new planting and landscaping which will achieve a biodiversity net gain of 323% (considerably in excess of the 10% required). As such, the Application complies with London Plan Policy G8, as well as Local Plan Policies P13, P15 and P61.

Green Infrastructure, Ecology and biodiversity

243. 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 while commercial/sui generis uses need to achieve a score of 0.3.
244. 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

245. The proposed development achieves an UGF score of 0.323 which is a combination of green roofs, tree planting, perennial planting, vertical greening, vegetation and permeable paving. The images below illustrate the location of landscaping and urban greening on the site.



246. Overall, the scheme will achieve a UGF which is consistent with the policy expectations for mixed-use developments under LP Policy G5. This will include 19 new trees and uplift in canopy area of 391m² which is considered to be a considerable improvement for the site. This is also exclusive of the new gardens that the Applicant is committed to providing on the 'rubble site' (between Styles House and the new Residential Building) and which will be secured in the s106 agreement which will result in a UGF score of 0.4. The proposed development will also achieve a Biodiversity Net Gain of 368.04% in habitat units, representing a considerable uplift above the 10% Policy requirement.

Ecology

247. The applicant's Ecological Appraisal which includes habitat surveys, searches for notable species, and a survey for potential bat roosts and nesting birds, notes that the site is of low ecological value, comprising of mainly hardstanding, with minimal areas of urban trees and ornamental plantings. The appraisal identified that opportunities for bats roosting and foraging were negligible however notes potential opportunities for low numbers of nesting birds and makes recommendation for precautionary measures during building demolition. In addition, the proposed development includes the implementation of native tree planting and wildlife friendly planting as well as green walls and roof, and the installation of artificial nesting and roosting boxes which will enhance the biodiversity of the site.

248. Overall, given the low or negligible ecological importance of the site, the Appraisal concludes that no significant impacts to designated habitats or priority habitats will occur as a consequence of the redevelopment of the site.

Biodiversity

249. Biodiversity Net Gain (BNG) is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains. The National requirement is for all developments (unless exempt) to achieve a 10% uplift in biodiversity which must be demonstrated using a statutory metric tool. The 10% net gain is reflected in Southwark Plan Policies. The legislation sets out 3 ways in which the net gain can be achieved. Specifically; (and in order of priority/preference) the developer should achieve 10% onsite, if this is not possible then offsite credits can be secured and as a final resort statutory credits can be purchased. It is a validation requirement for all applications (unless exempt) to submit the statutory metric and in all scenarios a Biodiversity Gain Plan must be submitted prior to commencement of development (secured by way of a national pre commencement condition). Compliance with onsite provision, offsite provision or statutory credits should be secured in a s106 agreement.

250. The applicant's BNG Assessment found the site to have a baseline value of 0.09 onsite habitat units. The proposal would deliver biodiversity gain through the enhancement of ground level planters, green walls, new tree planting and the creation of habitats that are well suited to urban locations (including green roofs and bird boxes). As a consequence, the on-site measures propose to deliver an

increase of 0.33 area-based biodiversity units which would deliver a total of 0.42 habitable units. This equates to a net percentage gain of 368.04%, thereby exceeding the 10% net gain required under the Environment Act 2021.

251. Delivery of the habitats proposed will require monitoring and maintenance through the construction phase and implementation of mitigation measures to protect retained existing trees. As such, protection measures and delivery and maintenance of the habitats will be secured as part a detailed CEMP by way of a condition.
252. Similarly, maintenance of the proposed habitats is required to ensure the habitats maximise their biodiversity potential through the operational phase of the development. To ensure the habitats can maximise their potential, a long term (~30 year) maintenance and management plan will be secured as part of a S106 obligation for the habitats in the public realm and the green roofs associated with the proposed development.
253. Overall, the proposed development would comply with the BNG requirements of the Environment Act 2021.

Fire safety

254. 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.
255. A Fire Strategy was submitted with the application which included a matrix that assesses the scheme for compliance against the relevant parts of Policy D12. Among other things, the Fire Strategy confirms that:
 - Both buildings will be provided with two stairs for means of escape and fire service operations;
 - One firefighting shaft will be provided with a dedicated firefighting lift and as an enhancement over the minimum provisions of guidance a second lift will be provided as a firefighting lift with the addition of evacuation intercoms in line with BS 9999 Annex G.
 - The basement will be provided with smoke ventilation and will be separated from the accommodation via smoke ventilated lobbies.
 - A mechanical smoke ventilation shaft will be provided in each evacuation lift lobby.
 - Ancillary accommodation will be separated from common residential escape routes in accordance with BS9991.
 - A “stay put” policy would apply for the residential accommodation, but a “simultaneous evacuation” strategy would apply for all other ancillary areas (such as the common rooms) and non-residential accommodation (such as the retail space).
 - Travel distances are limited to between 7.5m and 9m in a single direction for residential areas and 18m in a single direction for commercial and communal amenity areas.
 - All areas of the PBSA Building and all flats in the Residential Buildings will have a fire detection and alarm system. Non-residential areas will be

provided with also be provided with detection and alarm system.

- Sprinklers will be provided throughout both buildings.
- Each firefighting stair will be provided with a dry riser that will have an outlet on each storey. All hose laying distances are within 45m from a dry riser outlet in a protected stair or within 60m of a dry riser outlet in a firefighting core in line with code guidance.

256. The Fire Strategy was produced by fire risk engineering consultancy Hoare Lea. The contents of the document have been checked and approved by a certified fire risk engineer (a Member of the Institute of Fire Engineers).

257. 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.

Secured by Design

258. The application has been reviewed by the Metropolitan Police, Secure by Design Advisor who is satisfied that, should this application proceed, it would be able to achieve the security requirements of the Secured by Design. Conditions are recommended to ensure the development will achieve these requirements.

Archaeology

259. Part D of LP Policy HC1 states that development proposals should identify assets of archaeological significance to inform the design and appropriate mitigation. In addition, SP Policy P23 sets out the requirements for archaeological findings on-site.

260. The site is located within the *North Southwark and Roman Roads* Tier 1 Archaeological Priority Area which is categorised as an area of very high archaeological sensitivity. However, the site has been subject to an earlier archaeological evaluation and the site of Southwark Underground Station was archaeologically examined during the Jubilee Line project. The subsequent development of the station removed any potential archaeology within its footprint. A such, no further archaeological works are necessary for this site.

261. As confirmed by the Council's Archaeology Officer, the proposal would not result in adverse impacts on any identified archaeological assets and as such, is considered acceptable and recommended for approval.

Transport and highways

Site Context

262. The site benefits from an exceptional level of accessibility to the London public transport network with immediate access to Southwark Underground station on the Jubilee Line as well as being within easy walking distance of Waterloo and Waterloo East stations which offers onward connections to the mainline train network. Blackfriars Road offers many bus routes and Cycle Superhighway 6 lies immediately adjacent to the site on Blackfriars Road. A cycle hire docking station

occupies a temporary location above the station box itself and provides 82 cycle parking spaces. The site sits within Controlled Parking Zone C1 which operates Mon – Fri 8 – 23:00 and Sat 9.30 – 12.30. Joan Street, which connects The Cut to Hatfields, dissects the site in a north south orientation.

Trip generation

263. 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.

264. The applicant has provided the daily trip generation profile of the proposed development, in addition to peak hour trip generation and a comparison against the trip generation of the consented scheme.

265. A total of 162 daily trips are forecast to be generated by the proposed residential and student elements of the development, all of which would be undertaken via active and public transport modes. With regards to the 123 sqm of retail / café space, all trips (other than servicing) are considered 'pass-by' trips and not 'new' to the network. The community facility would be used by residents of the affordable building along with the existing Styles House and is also not expected to generate any material trips during the network's peak periods.

266. The proposed development would result in a net reduction in overall trips in comparison to the consented office led scheme as shown in the table below. Overall, the proposed development would generate 761 fewer trips during the AM peak hour and 682 fewer during the PM peak hours. The proposed development would also result in net reduction in trips across all modes when compared to the consented multi-modal trip generation with the exception of outbound bus trips during the AM (+3 trips) and inbound in the PM (+2 trips); which is considered to be minor.

Total Person Trips	AM Peak (08:00 – 09:00)			PM Peak (17:00 – 18:00)		
	In	Out	Total	In	Out	Total
Consented	762	79	841	67	697	764
Proposed	70	80	55	27	82	70
Net Change	-752	-9	-761	-12	-670	-682

Table 5: Net change in total person trips between the consented scheme and proposed development

267. When considering the impact of the proposal on the existing public transport network, the net impact of proposed public transport trips compared to the consented scheme are noted in the table below.

Net Public Transport Trip	AM Peak (08:00 – 09:00)			PM Peak (17:00 – 18:00)		
	In	Out	Total	In	Out	Total
Bus	-109	+3	-106	+2	-98	-96

Underground	-238	-2	-240	-1	-214	-216
Rail	-302	-5	-306	-2	-272	-274

Table 6: Net change in public transport trips across mode between consented scheme and proposed development

268. It is noted that a bus stop accessibility audit was undertaken during the course of the Application and as a result a payment requested from TfL for bus infrastructure improvements which will be secured in the S106 Agreement. Overall, the proposed development would offer an improvement in terms of public transport trips and therefore, it is considered the public transport network surrounding the site is sufficient to accommodate the demand generated by the proposed development.

Student move-ins and move-outs

269. Students moving in and out of PBSA can generate a significant demand for loading space nearby. A capacity assessment has been undertaken to demonstrate that there would be sufficient space on Joan Street to manage the arrival of students. The procedure for managing student arrival and departure periods at the start and end of term will also be set out within a standalone 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:

- It is projected that up to 25% of students (108) may be dropped off via car with the remainder arriving by other modes of transport.
- Arrivals / drop-offs will take place over two weekends (4-days) over a 10-hour window (09:00-19:00) i.e. 40 hours total.
- Vehicles would be permitted to stop to unload on Joan Street for 20-minutes before being moved on.
- Joan Street has 30m of kerbside space available for loading. On moving days, 12m would be dedicated for arrivals (12m = 2 cars). The remaining kerbside space would be available for the daily servicing requirements associated with the PBSA and adjacent residential block.
- Hourly parking/unloading capacity = 6 vehicles (2 bays turned over 3 times per hour).
- Student leases would be for 51 weeks (annual) but with the option to utilise the space for summer school outside of term time. It is therefore, anticipated the PBSA occupancy would reduce in the holidays.

270. The results of the capacity assessment and the key elements above are summarised in the table below. In total, there is identified capacity for 240 students to be dropped off by vehicle (private car or taxi), in line with the management strategy, whereby timed slots would be allocated. This would equate to 56% of the student population and is considered more than sufficient given the majority of students would be anticipated to arrive via public transport.

Days	Hours Per Day	Hours Total	Hourly Parking Capacity	Total Turnover
4	10	40	6 vehicles	240 Vehicles

Table 7: Net change in public transport trips across mode between consented scheme and proposed development

271. Overall it is considered that the anticipated trips generated by the student component of the proposed development would be modest and that these would be adequately managed by the standalone Student Management Plan such that no harm would be caused to the local highway network or surrounding residential amenity. The proposed obligation relating to the standalone Student Management Plan will be worded to expressly require inclusion of measures in respect of the move in and move-out process.

Servicing and deliveries

272. 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. A total of 56 two-way daily delivery and servicing vehicle trips are forecast to be generated by these elements, however 46 trips are projected to be mainly motorcycles and cycle couriers.

Servicing/delivery trip generation

273. The applicant's Transport Assessment predicts a total of approximately 70 daily two-way trips accounting for 12 deliveries to the student housing, 56 to the residential housing and 2 to the retail units. It is noted that majority of the deliveries (46 trips) to the Residential Building are projected to be motorcycles and cycle couriers. 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. Furthermore, it is understood that deliveries will be scheduled to avoid peak hours. A Delivery, Servicing and Waste Management Plan will be secured via a S106 agreement.

Car parking

274. The proposed development would be largely car free with the exception 1 blue badge space which is proposed for the Residential Building. As the site is in PTAL 6b, with excellent connectivity, the proposed car-free development is acceptable and in line with the London Plan.

275. As per London Plan Policy T6 and Southwark Plan Policy P54, a minimum 3% provision of blue badge parking spaces is required. Whilst the location of the blue badge space is acceptable an additional space was requested given the number of affordable residential homes proposed. On the basis that the proposed Residential Block would be managed by the existing Styles House TMO and that there are 3 existing, Blue Badge bays which would help mitigate the provision of only 1 space as part of the development, on balance this is considered acceptable. It is considered that the quantum of parking proposed is appropriate to serve the requirements of a site of this scale in this location in Central London and would comply with London Plan Policy T6. Furthermore, the development

includes the provision of an Electric Vehicle Charging Points (EVCPs) for the blue badge bay in Styles House which is considered positive improvement in supporting the Council's sustainable development objectives.

276. As per Southwark Plan Policy P54, on-street parking permits will not be available for residents, students or businesses in current or future CPZs.
277. Lastly, car club membership will not be offered to students. However, Residents of the affordable units, upon first occupation, will be eligible for free 3-year membership to a local and easily accessible car club within 850m of the site. It is noted that there is a hire car company which operates within 5 dedicated bays within a 500m radius to the site. The funding for the car club membership will be secured via S106 agreement. This is considered acceptable in terms of reducing private car usage and promoting multi-modal forms of transport.

Cycle parking and cycling facilities

278. The proposed development would comply with the cycle parking standards prescribed under the London Plan which require 322 cycle spaces for the student accommodation, 81 long stay cycle parking spaces for the residential homes, and 2 cycle spaces for the community and retail uses in addition to accessible and external visitor spaces. The provision of cycle parking is detailed in the Table below.

Use Class	Standards		Requirement		Proposed	
	Long-Stay	Short-Stay	Long-Stay	Short-Stay	Long-Stay	Short-Stay
Student Accommodation	0.75 spaces per bedroom	1 space per 40 bedrooms	322	11	322	11
Residential (C3)	1 space per studio or 1 person 1 bedroom Dwelling 1.5 spaces per 2 person 1 bedroom dwelling 2 spaces per all other dwellings	5 to 40 dwellings: 2 Spaces Thereafter: 1 space per 40 dwellings	81	3	81	3

Retail	1 space per 500sqm	1 space per 1000sqm	1	1	1	7
Community	1 space per 500sqm	1 space per 1000sqm	1	1	1	3

Table 8: Cycle Parking Standards, Requirements and Provision (London Plan 2021)

279. The proposed cycle parking comprises a mix of tiered spaces, single and double racks, Sheffield stands and accessible stands. Long stay cycle stores are mostly located on the ground floor level (step free) within each building and are not directly accessible or visible to the public highway. Due to the ground floor constraints associated with the site servicing and Southwark Station, some of the cycle parking is located at first floor level. Short stay visitor cycle parking is provided within the proposed new public realm to the north of Joan Street, near the 'eyelid'. It is noted, additional visitor cycle parking provisions have been accommodated for the proposed retail and community uses at the request of officers.

280. The proposed development includes the re-provision of a Santander docking station with 30 cycles on the corner of Joan Street and a micro-mobility bay for operators such as Lime and Forest as well as reusing an on-street parking bay with an e-bike scooter bay with capacity for up to six e-bikes or 12 e-scooters. Overall, the proposed cycle docking station and micro-mobility bay are supported and would encourage the use of active forms of transport in line with the Council's sustainability principles. The re-provision of the cycle docking station would also align with the S106 Agreement associated with the consented office led scheme on the site.

281. Detailed plans have been provided regarding the proposed cycle store layouts. While generally acceptable, Council's Transport Policy Officer notes cycle store layouts including relevant dimensions demonstrating minimum clearance heights, aisle widths, stand specifications, accessible clearances as well as details regarding lighting and weatherproof will need to be provided as part of detail cycle parking plan. A condition is therefore recommended for an updated cycle store layout plan to be provided which demonstrates compliance with the relevant cycle parking specifications. Given the principle and provision of the cycle parking is acceptable and given the available space dedicated to cycle storage, it is considered reasonable in this instance for this information to be confirmed by way of a condition.

Pedestrian movements / Access

282. A payment towards improving pedestrian and cycling routes on Joan Street, which is a key connection to the development will be secured in the S106 Agreement. These will contribute to creating better permeability for pedestrians and cyclists accessing the development from The Cut, Isabella Street and Cycle Superhighway 6. Enhancing permeability throughout the site will also improve public safety for the future residents of the development. Furthermore, improvements on Joan Street will enhance connectivity to the site and create better movement patterns in the wider area by reducing pedestrian and cyclist

congestion on Blackfriars Road. Overall, the proposed development has been designed to maximise pedestrian and through site access and will contribute to greater connectivity with the surrounding area.

Conclusion on Transport and Highways

283. The scheme would minimise vehicle movements by prioritising use of public transport, walking and cycling, and by encouraging consolidation of deliveries. The increased activity of the site is not considered to give rise to any adverse impacts on the surrounding area and the proposals are considered to be acceptable in transport and highways terms.

Environmental matters

Construction management

284. The proposed development includes demolition works to the ground and basement therefore will be subject a construction environmental management plan (CEMP) and demolition environmental management plan (DEMP). No development shall take place, including any works of demolition, until a written CEMP / DEMP has been submitted to and approved in writing by the Local Planning Authority. The CEMP / DEMP 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.

Waste Management

285. The 44 residential flats are estimated to generate a total of 17,145 L of waste per week, with storage designed for mixed recycling, residual and organic food waste collection in line with local guidelines. The 429 student units are estimated at 37,538 L of waste generation per week, managed through communal bin stores. Retail waste generation has not been calculated given the size of the units however, waste would be stored within the units with specific arrangements for private collection to be made by the tenant.

286. Plans have been provided which demonstrate that a 26-tonne waste collection vehicle can enter and exit the site to service the Residential and PBSA Buildings and that sufficient waste storage areas for recycling, residual and food waste have been provided in each building with sufficient drag distances and access arrangements via Joan Street. Plans have also been provided demonstrating that the TFL bin store has been relocated adjacent to the PBSA bin store with access directly adjacent on Joan Street.

287. Overall, sufficient waste storage and appropriate management would be provided in accordance with the requirements of the development plan and relevant guidance. The measures and strategies set out in the draft waste management plan are considered generally acceptable and compliance with a detailed operational waste management plan will be securing by way of condition.

Water resources

288. Thames Water have confirmed that there is sufficient capacity on the network for the proposed development. They have in their comments recommended standard conditions and informative relating to piling, ground water discharges, sewage flooding, proximity to assets and surface water drainage. Recommended conditions have been attached accordingly.

Flood risk and drainage

289. The site is located in Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding. Paragraph 165 of the NPPF advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. In line with the NPPF, the Council has a Flood Risk Assessment which acknowledges that development within flood zone 3a is required and is allowed with the application of the Exception Test set out the NPPF.

290. Paragraph 167 of the NPPF states that the need for the exception test will depend on the potential vulnerability of the site and of the proposed development, in line with the Flood Risk Vulnerability Classification set out in national planning guidance. The development does not contain any ground floor homes which are classified as 'more vulnerable' uses under the NPPF.

291. For the Exception Test to be passed it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, and that a site-specific flood risk assessment must demonstrate that no adverse impacts would occur. Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account.

292. The Proposed Development would constitute redevelopment of a previously developed site and include flood mitigation measures in the form of sustainable drainage systems (SuDS) and separate foul and surface water drainage to ensure that the sustainability benefits outweigh the flood risk. The proposed SuDS has been designed for the whole lifetime of the building up to the 1 in 100 year + 40% Climate Change rainfall event, as well as flood resistant design measures. Surface water attenuation will be provided in the form of blue roofs to restrict the site discharge rate to 107.4 l/s for the 1 in 100-year storm event, representing a betterment rate of 51% from the existing condition. Given the overall reduction in the site discharge rate, the development is considered to be safe and will not increase the flood risk elsewhere.

293. The flood risk assessment prepared by Heyne Tillett Steel has been reviewed by the Council's Flood Risk Officer and found to be acceptable subject to full details of the surface water drainage system including SUDS being submitted and approved in writing by the Council. As such, it is considered that the Proposed Development would have an acceptable impact with regard to flood risk and drainage.

Land contamination

294. A Phase 1 Land Contamination Assessment Report, prepared by RMA Environmental was submitted as part of the Application and details the historic land uses on the site and in the wider vicinity as well as providing a study of available records. Based on this research, the report concludes that the risks from contamination are moderate to low, with there being no risk of vertical migration of any potential contamination due to the London clay being impermeable, as well as there being no risk of ground gas accumulation. The report does however set out a series of recommended mitigation measures which, if followed, would ensure that the contamination risk to the proposed development and/or identified receptors would be negligible.

295. The report was reviewed by the Council's EPT Officer who recommended that an intrusive phase 2 report be prepared prior to commencement of the development to fully characterise the nature and extent of any contamination of soils and ground water on the site and provide a remediation strategy if required. It is therefore recommended that further contamination investigation and risk assessment be undertaken for the site and secured as part of any future planning consent.

Air quality

296. The application was accompanied by an Air Quality Report, prepared by Cogan which confirms that the proposed development, during construction, operation and cumulatively, will have negligible impacts upon the local area. This is primarily due to very limited car parking on site and use of electrically driven heat pumps rather than burning of fossil fuels which result in the proposed development being air quality neutral in terms of both building and transport related emissions.

297. While it is noted that during construction works there is the potential for dust to be created, a package of dust mitigation measures is proposed to minimise these impacts which will be short term. Based on suitable mitigation being implemented during the construction works which will be secured by way of condition, the air quality effects are considered to be 'not significant' and compliant with all regulatory standards.

298. Overall, the application is in accordance with Policy SI1 of the London Plan and Policy P65 of the Local Plan in ensuring London's air quality standards are maintained. Any short-term effects on air quality during construction will be successfully mitigated through the CEMP and the operational stage will meet air quality neutral.

Wind

299. A wind microclimate assessment, prepared by GIA was submitted as part of the Application and confirms that there are no wind safety risks associated with the proposed development at either ground level or elevated levels.
300. Given the context of the area and location of the site relative to surrounding shelter and nearby tall buildings, it is considered that the proposed development will not significantly alter the local wind microclimate and long-term wind comfort conditions will be suitable for the intended use for thoroughfares, building entrances, bus stops, railway platforms and amenity spaces on and off site.
301. Overall, it is considered that the application complies with Policy D6 of the London Plan and Policies P14 and P56 of the Local Plan by ensuring adequate daylight, sunlight, and a comfortable microclimate.

Energy and sustainability

Whole life cycle and carbon capture

302. As part of the submission, a Whole Life Carbon Assessment (WLCA) prepared by AECOM has been undertaken which demonstrates that the proposed upfront embodied carbon for Block A (PBSA Block) is estimated to be 777kgCO2e/m² while Block B (Residential Block) is estimated to be 709kgCO2e/m². The proposed embodied carbon is an improvement on the A1-A5 GLA benchmark of 850 kgCO2e/m². It is noted that the report includes recommended design improvements which provides further opportunities to reduce the embodied carbon of the scheme, and which could be explored at the detailed design stage. However, the assessed intensity is a market-leading outcome. Based on a comparison with other buildings of similar massing, this would put the scheme's performance on an equivalence with many mid to high rise schemes currently in planning and under construction.

Circular Economy

303. The Circular Economy Statement submitted with the Application outlines how the Proposed Development will seek to minimise and reduce the waste generated from the scheme and the materials used throughout its life cycle, including the end-of-life stage, as required under LP Policy SI7.
304. The strategic approach and commitment targets of the Application are summarised below:
 - Minimum 95% of non-hazardous demolition waste to be diverted from landfill for reuse, recycling, or recovery
 - Minimum 95% of inert excavation waste to be diverted from landfill for beneficial use

- Minimum 95% of construction waste to be diverted from landfill for reuse, recycling, or recovery
- Exceed 65% municipal operational waste recycling targets by 2030
- Minimum 20% of the total value of the selected products and materials to include recycled and reused content
- To provide a Post-Construction report to the Greater London Authority.

305. Based on the approach and methodology being implemented and monitored during construction and operation, it is considered that the Application would meet LP Policy SI7.

Carbon emission reduction

306. The Proposed Development embodies an ambitious energy and carbon reduction strategy. Through the adoption of innovative and best practice energy reduction measures, the Proposed Development will achieve an overall regulated carbon dioxide emissions of 39% over Part L 2021. In accordance with LP Policy SI2 and SP Policy P70, the shortfall in carbon emissions to meet net zero will be met by an off-site payment in-lieu. This has been calculated at £223,502 (£35,478 for the residential building and £188,024 for the PBSA building) towards offsetting the carbon emissions of the Proposed Development.

Be Lean (use less energy)

307. The Proposed Development has been designed to reduce CO₂ emissions from the site beyond the standard required by Building Regulations Part L 2021 through fabric and energy efficiency measures as well as low and zero carbon energy supply options.

308. For both the Residential and PBSA Blocks, consideration has been given to passive design, fabric and services of the buildings, including the orientation and layout of the dwellings, optimised glazing ratio to reduce heat loss and limit unwanted solar gains, high performance U-values for the building fabric, best practice thermal bridging, high level of air tightness; and high efficiency lighting and ventilation systems including heat recovery.

309. The Proposed Development avoids north-facing single aspect apartments which may have limited access to daylight and sunlight. The opportunity to provide dual aspect dwellings has been maximised within the Site, aiding cross ventilation. All residential dwellings are proposed to incorporate highly efficient mechanical ventilation systems with heat recovery (MVHR). While 100% low energy fixed lighting is proposed for use within the dwellings. Lastly, the use of smart meters and sub metering will ensure data is being monitored and can be used to address the performance gap and provide data to the GLA to support the “Be Seen” policy.

310. Overall, an estimated reduction in CO₂ emissions of 5.5 tonnes/CO₂/year for the residential building, and 7.3 tonnes/CO₂/year for the non-domestic building are projected. These reductions equate to 11% ‘Be Lean’ CO₂ emission saving for the residential building, and a 10% ‘Be Lean’ CO₂ emission saving for the non-domestic elements of the Proposed Development. The total development wide saving is 10% which is in line with the domestic Be Lean target.

Be Clean (supply energy efficiently)

- 311. The development follows the heating hierarchy prescribed under Southwark Plan Policy P70 which outlines major developments must be designed to connect to existing energy networks, or if no existing schemes exist, investigate whether such networks are planned in the area and designing systems with the flexibility to connect to these in the future.
- 312. There are no proposed heat networks in the local area for connection at Day One. However, it is proposed that both the Residential and PBSA Blocks will operate heat pump led system with future connection provision to a district heat network. It is noted that due to the proposed buildings being intersected by Joan Street and having separate entities for ownership and operation of the buildings, two independent energy systems have been developed, both being capable of connecting to a district heating network, if/when available in the future.

Be Green (Use low or carbon zero energy)

- 313. Heating and cooling for the Residential Block will utilise an ambient loop system via reversible air source heat pumps (ASHPs) located at roof level and pipework system. This pipework shall serve local water source heat pumps (WSHPs) located within each residential unit. The WSHPs shall provide heating, cooling and domestic hot water as required. Local MVHRs shall be provided within each residential unit to provide mechanical ventilation. A common air handling unit shall provide normal and smoke ventilation to plant rooms and other basement areas. While the community space is a shell and core unit and has been designed to be heated and cooled by a standalone variable refrigerant flow system with MVHR providing ventilation.
- 314. Heating and Cooling to the PBSA Block will be provided by roof mounted ASHP units which will feed the student units, as well as amenity areas and back of house spaces. The ASHPs will also provide source heating to WSHPs located at basement level, which will be utilised to boost heating temperatures to provide domestic hot water for the building. Individual student units as well as the amenity spaces and back of house areas will be ventilated by local MVHR units. A common air handling unit shall provide normal and smoke ventilation to plant rooms and other basement areas. While the retail units will be self-contained, with local ventilation provided by the retail tenant, as well as local air source heat pumps for heating/cooling.
- 315. The Proposed Development will also incorporate roof mounted Photovoltaic (PV) panels on the uppermost roof areas that are not to be utilised for plant equipment, maintenance areas or areas significantly overshadowed. The maximum available area will be dedicated to on-site energy generation. For the Residential Block the proposed PV array will account for an estimated kWh/m² annual generation of 2.44 kWh/m² while for the PBSA Block this will be an estimated 0.66 kWh/m².
- 316. Overall, the Proposed Development will achieve an estimated 76% emissions saving at the 'Be Green' stage compared to the 'Be Lean' and 'Be Clean' stages for the domestic element and 14% emissions saving at the 'Be Green' stage for the non-domestic elements.

Be Seen (Monitor and review)

- 317. The non-residential elements of the development have been assessed using a CIBSE TM54 compliant methodology to provide an assessment of regulated and non-regulated energy consumption, for each building. The residential elements of the development have been assessed using the SAP tool.
- 318. A comprehensive NABERS UK design assessment will be carried out during the next design stage. They are an adopted UK variant of the original model, which is administered by BRE. They have a particular focus on ensuring that the ultimate energy performance of a building in use is aligned with its design, procurement, and construction.
- 319. The GLA's "be seen" reporting spreadsheet has been provided with the application. The Proposed Development will include building management systems and a metering strategy to control and monitor operational energy performance, to allow reporting on services and metering of both blocks. A planning obligation would secure the ongoing monitoring and reporting requirements, to comply with policy SI2 part A.4.

Overheating

- 320. The risk of overheating has been assessed throughout the development, in both residential and non-residential areas, in line with the requirements of the GLA. Overheating risk has been mitigated through a range of cooling design features including external shading, optimising window sizes and openings, insulated walls, triple glazed windows, low energy lights, maximised ceiling heights, cross ventilation, tempered cooling and use of MVHRs.
- 321. In summary, the overheating reports demonstrates that without any site constraints and when windows can be fully opened, all units are able to achieve a Part O 2021 compliance for overheating. Once the site constraints are considered, the most practical mitigation measure for the current design is the introduction of tempering units to the occupied rooms. The tempering solution can be manually operated and so allow the occupants freedom of choice; if, when and the duration they choose to activate the units, or alternatively accept some higher acoustic levels and use natural ventilation during cooler period and mid seasons. The Cooling Hierarchy set out under LP Policy SI4 has been followed to minimise the operation carbon of the cooling systems.

BREEAM

- 322. Policy P69 of the Southwark Plan states that non-residential development must achieve a BREEAM rating of 'Excellent'. The applicant's BREEAM assessment indicates that the proposed PBSA Block has been designed to achieve a rating of 'outstanding' which exceeds minimum policy requirements. A planning condition is recommended to secure this.

Digital connectivity infrastructure

323. London Plan policy SI6 on digital connectivity infrastructure requires the provision of sufficient ducting for full fibre connectivity to all end users in new developments. Southwark Plan policy P44 requires delivery of fibre to the premises broadband or equivalent technology for future occupants and users. The scheme includes provision for full fibre connectivity to ensure all commercial and residential end-users can benefit. A compliance condition is attached to ensure each building has fibre connection in line with the submitted information.

Planning obligations (S.106 agreement)

324. Policy IP3 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Policy IP3 of the Southwark Plan is reinforced by the recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic Policy 14 'Implementation and delivery' of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

325. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site-specific mitigation that meets the tests in Regulation 122 can be given weight. The obligations that meet the Regulation 122 tests and have been agreed are below. The NHS have requested a payment contribution of £52,756, however the impact on health services is mitigated through the CIL contribution.

326.	Planning Obligation	Mitigation	Applicant Position
	Affordable housing	<p>a) 44 homes (150 habitable rooms – 25.9% of total) to be provided on-site as affordable housing.</p> <p>b) Tenure split: 100% social rent</p> <p>c) 100% of the affordable units to be made available before any of the PBSA units can be occupied.</p>	Agreed
	Affordable housing payment for affordable housing	£15,685,000 (equivalent to 156 habitable rooms – 26.9% of total)	Agreed (to be a separate legally binding agreement with the Council, that will be signed at the same time as the s106 agreement)

Affordable housing monitoring	On-going reporting requirements on the delivery of the affordable housing. Financial contribution for the monitoring of the affordable housing provision on site.	Agreed
Community Facility	Construct and make available the community facility prior to occupation of the PBSA	Agreed
Energy statement and carbon offset financial payment	a) Secure agreed carbon target (uplift over Part L). b) Secure futureproofed connection to DHN. c) Energy schedule (standard wording). d) Secure carbon off-set contribution payment of £223,502 (comprising £35,478 for the residential building and £188,024 for the PBSA building).	Agreed
Be Seen – on-going monitoring and post-installation review	Post-construction monitoring and reporting of each block.	Agreed
Student Management Plan	To deal with management of students on site and potential disturbances off site.	Agreed
Wheelchair units	To secure marketing of the wheelchair units, in listed locations, and to prevent occupation of wheelchair units by non-wheelchair users until the marketing has been demonstrated to approved.	Agreed
Construction phase jobs / skills and employment requirements	Provide 46 sustained jobs to unemployed Southwark residents, 46 short courses, and take on 11 construction industry apprentices during the construction phase or meet the Employment and Training Contribution. The maximum Employment and Training Contribution is £221,200 (£197,800 against sustained jobs,	Agreed

	<p>£6,900 against short courses, and £16,500 against construction industry apprenticeships).</p> <p>An employment, skills and business support plan should be included in the S106 obligations.</p>	
Local procurement	<p>The applicant must allow local businesses to tender for the procurement of goods and services generated by the development both during and after construction.</p> <p>To allow procurement opportunities for local businesses.</p>	Agreed
Transport for London – Bus Services	Payment of £88,000 for bus infrastructure and service improvements.	Agreed
Transport for London - Legible London signage	No value provided by TfL but experience from other schemes indicate 1 x totem costs £24,000.	Agreed
Transport for London – Cycle Hire Docking Station	<p>a) £220k towards relocating existing all 54 docking points and two terminals. 30 spaces provided on The Cut.</p> <p>b) £30k towards operation of the scheme – redistribution of bikes and servicing the scheme for the first year after occupation. This is to fund increased re-distribution visits to balance the scheme due to increased demand from the student accommodation.</p>	Agreed
E-scooters	The delivery of a scooter bay for up to 12 e-scooters, within Joan Street.	Agreed
Joan Street S278 works.	<p>a) Payment of £100,000 related to the off-site works for the Healthy Streets initiative (Discretion of the Council / LBS Highways to spend on the northern section of Joan Street)</p> <p>b) To enter an S.278 Agreement with LB Southwark to enhance Joan Street with the provision of 2.5m footways along either side within the boundary of the</p>	Agreed

	highway land, together with Copenhagen style crossings at the southern and northern ends.	
Highway works and transport contributions	<p>a) Revocation of Parking Permits for all proposed residential units (unless blue badge holder).</p> <p>b) Car Club provision and 3-years free Membership for the first occupant of each affordable residential unit (£60 per annual membership, £7,920 total)</p> <p>c) A travel plan and delivery and servicing plan</p>	Agreed
Public realm	<p>a) Maintenance arrangements.</p> <p>b) Submit a delivery strategy for approval to set out the phased delivery of the public realm across the site.</p> <p>c) To landscape the 'rubble site' between Styles House and the proposed residential building to create a community garden, including the provision of 517sqm of children's play space (that meet all play space requirements of the site).</p> <p>d) To provide an additional (1) blue badge parking space within Styles House</p> <p>e) To include a fallback provision for the necessary funding to be provided for LB Southwark to undertake those works (of £175,000), should the Applicant be unable to do so prior to occupation of the first student room.</p>	Agreed
Ecology	<p>Significant enhancement to be secured for 30 years</p> <p>Tree planting maintenance plan</p>	Agreed

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327. In the event that an agreement has not been completed by 05/09/2025, the committee is asked to authorise the director of planning to refuse permission, if appropriate, for the following reason:

328. In the absence of a signed S106 legal agreement there is no mechanism in place to mitigate against the adverse impacts of the development through contributions and it would therefore be contrary to Policy IP3 Planning Obligations of Southwark Plan 2022, 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)

329. 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.

330. The site is located within Southwark CIL Zone 2 and MCIL2 Central London Zone. Based on the GIA provided in CIL Form 1 and planning application form, both dated 19-Sep-24, the gross amount of CIL is £5,570,324.21 (pre-relief). Subject to the correct CIL Forms being submitted on time, CIL Social Housing Relief of approximately £2,005,303.54 can be claimed for a number of types of affordable housing. Thus, the resulting CIL amount is estimated to be £3,565,020.67 (net of relief). It should be noted that this is an estimate, floor areas will be measured and checked when related CIL Assumption of Liability and Relief Claim Forms are submitted, after planning approval has been secured.

Community involvement and engagement

331. This application was accompanied by a statement of community involvement (which provides full details of the public consultation). In summary, the document confirms that the following, in-person, public consultation was undertaken by the applicant prior to submission of the application:

- 11th June 2024 – Meeting with Styles House Tenant Management Organisation (TMO)
- 25th June 2024 – Landscaping workshop with Styles House TMO
- 17th July 2024 – Public consultation preview for Styles House residents
- 18th July 2024 – 1st public exhibition event
- 20th July 2024 – 2nd public exhibition event
- 31st July 2024 – Pop-up event was held at TfL's head office at Palestra
- 6th August 2024 – Further meeting with Styles House TMO.

332. A dedicated consultation website was created which provided details of the proposed scheme, explained how to provide feedback and provided details of the public exhibition session. In addition, a newsletter was distributed to 1,592 local residents and local businesses with a 0.5m radius. Similarly, the leaflets included images of the proposed development, contact details, information about how to provide feedback and promoted the public consultation workshops. A hybrid approach – both online and in person – enabled members of the public to engage in a way that best suited their needs.

333. In addition to the public consultation, key political and community stakeholders' engagement was carried out. This consultation included MP's and Councillors as well as various community centres/groups and resident associations.

334. The applicant provided an engagement summary for the development consultation charter. It details the extent of pre-application consultation and demonstrates that the applicant has made acceptable efforts to engage with those affected by the proposals. As part of its statutory requirements, the council, sent letters to surrounding residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process.

335. Details of consultation and re-consultation undertaken by the local planning authority in respect of this application are set out in the appendices. The responses received are summarised later in this report.

Consultation responses from members of the public and local groups

336. Public consultation was initially undertaken on 21/10/2024 and again on 17/12/2024 (*for design changes, internal updates and removal of the basement level to the Residential Block*). 340 neighbours were consulted, a total of 13 comments were received:

- 2 were in support
- 11 were in objection

337. Summarised below are the planning matters raised by members of the public and the planning officer's response. Further detail on these matters is set out within the relevant sections of this report.

338. Support:

- Residential housing offering
- Equality, diversity, and inclusion benefits
- Community Use (cultural and community-beneficial activities)

339. Objection comments are addressed in turn in the following paragraphs:

Height, bulk, scale and massing

340. Officer response - The site lies wholly within the designated Tall Building Area and the site-specific designation identifies that comprehensive mixed-use redevelopment of the site could include taller buildings subject to character, heritage and townscape impacts. Overall, the proposed development has been appropriately designed in terms of height, scale and massing – refer to Urban Design Section of this report.

Loss of daylight / sunlight

341. Officer response - The detailed analysis demonstrates that 69% of windows will meet the BRE's recommendations for the Vertical Sky Component (VSC) and 89% of rooms will meet the BRE guidance for No Sky Line (NSL), which is a very high level of compliance, considering the Central London location of the site. Furthermore, when compared against the extant permission, the proposed development would represent a material betterment to the daylight and sunlight that would be experienced by neighbouring residential properties. With regard to overshadowing of the external amenity spaces along Isabella St and adjoining Styles House, while the proposal does have some effect, it is marginal and both spaces will continue to exceed the BRE recommendations. Overall, the proposed development would not result in unacceptable sunlight/daylight or overshadowing impacts – refer to Sunlight/Daylight Section of this report.

Loss of privacy

342. Officer response - The proposed development is appropriately sited to ensure adequate separation distance are maintained between adjacent properties. Overall, it would not result in unacceptable privacy or overlooking impacts – refer to Privacy Section of this report.

Antisocial behaviour / noise and disturbance from PBSA

343. Officer response - The Student Management Plan provides a commitment to 24-hour, 7-day a week on-site management, complemented by security staff and CCTV. This will not only provide a safe environment for students, but their continual presence on site will ensure that any noise and antisocial behaviour can be dealt with immediately for the benefit of both other students and the wider community. The Student Management Plan and recommended measures will be secured by S106 Obligation.

No provision of local shops / café on The Cut not appealing

344. Officer response - The proposed development includes the provision of two retail/café uses as part of the PBSA Building either side of the entrance to Southwark station and have been appropriately designed to activate The Cut and Blackfriars Road. There are also a range of shops and other facilities within walking distance of the site including Tesco, Sainsbury's, cafés, restaurants and pubs, the Young Vic, the Old Vic, hairdressers, barbers and dry cleaners. The excellent accessibility of the site to both London Underground and the bus network enable easy access to the full range of shops available within London, when the needs cannot be met locally.

Community space will be retail orientated and not communal for use of residents

345. Officer response - Planning permission is being sought for community facilities which will be secured by S106 Obligation for the benefit of the residents of the proposed affordable residential building, the Styles House but also the wider community. The proposed community use will not be retail orientated.

Lack of sufficient affordable housing to meet housing target

346. Officer response - The proposed development would deliver 44 residential homes on site within the proposed residential block to the west of Joan Street, all of which would be delivered as affordable (100% social rent). This provides 150 affordable habitable rooms and equates to 35% of the total habitable student rooms (429 rooms). In addition to the provision of on-site affordable housing, the proposed development includes a S106 payment of £15,685,000 towards off-site affordable housing. This is the equivalent to a further 157 affordable habitable rooms which is equivalent to an affordable level of 71% of the proposed student accommodation which exceeds the 35% minimum requirement set by the Southwark Local Plan. In addition, 65.9% of the affordable housing provision would be two or more bedrooms, making a significant contribution towards the borough's family housing needs. This is considered to be a substantial social benefit given the demand for affordable housing in the borough.

Demand and suitability of student housing (decline in foreign students, overpriced for local student)

347. Officer response - As set out in the main body of the report there is an assessed need for student housing in the borough. The site is accessible to a number of university campuses and is in walking distance of King's College and Trinity Colleges London Campuses. Furthermore, there are only around 7,800 PBSA units and that at least 57% of the students within the Borough live in private rented accommodation. This results in most students having no choice but to go into the private rented sector which can lead to higher costs and competition with local residents for housing. Overall, the proposed student accommodation is considered acceptable - Refer to Student Accommodation Section of report for further detail.

Noise, pollution, dust and disturbance from construction

348. Officer response - A Construction Environmental Management Plan (CEMP) has been submitted as part of the application. Not only will the hours of construction be limited, but silencers, barriers and electrically powered equipment (minimising the use of generators), will be used where possible, alongside other measures. Dust will be minimised with water suppression systems, wheel washing, sheeting of materials and careful choice of equipment.

Both noise and dust will be continually monitored, with systems in place to stop activity should problems arise. There will also be points of contact established for local residents to raise concerns, so that they can be addressed immediately. It is considered that any noise and disturbance during the construction period will be temporary however will be minimised where practicable. Then CEMP and

recommended mitigation measures will be secured by S106 Obligation.

Increased use of Nelson Square Gardens, increase noise

349. Officer response - The proposed development includes both generous on-site amenity provision for students and will fund a new communal garden for those living within Styles House and for occupiers of the affordable residential building. Despite provision being made on site, it is possible that some people may use Nelson Square Gardens on occasion, but the number of people will be substantially less than would have been the case with the extant planning permission for the large office building and residential tower. Overall, it is considered that the proposal would not adversely impact Nelson Square Gardens.

Increased servicing and deliveries

350. Officer response - The proposed development would generate substantially fewer vehicle trips in both the AM and PM peaks than the extant permitted scheme. Furthermore, in this case, Joan Street is being retained and dedicated servicing bays provided within it, away from existing homes, thereby avoiding resultant problems for existing residents. Overall, the proposal has been appropriately designed to manage ongoing servicing and deliveries to student, residential and retail components – refer to Transport Section of this report.

Health impacts building close to rail line (noise and disturbance)

351. Officer response - A noise and vibration assessment were submitted as part of the Application. The detailed noise modelling undertaken has informed the design of the scheme which includes, the use of triple glazing and high-quality facades to ensure that a good internal environment for both the housing and students is achieved. Overall, it is considered that the development has been appropriately designed and will not result in adverse noise or health impacts to occupiers as a result of proximity to the rail line.

No means of blocking sunlight (shutters) – passive cooling, use of air conditioning and impact on climate

352. Officer response - Both residential and student buildings have been designed to achieve an optimum balance between achieving good levels of natural daylight within the rooms but avoiding overheating. This includes measures such as external shading, triple glazed windows, maximised ceiling heights to ensure passive cooling is maximised. Refer to Energy Section of this report for more detail.

No formal engagement with Styles House TMO

353. Officer response- The Applicant has had six separate face to face meetings/workshops with the TMO board. In addition, there was a private view for Styles House residents on 17 July and public exhibition events on 18th and 20th July. These were held in the Styles House meeting room for residents to attend. It is considered that the Applicant has adequately consulted with the

Styles House TMO prior to submission of the Application.

Lack of green space / insufficient planting

354. Officer response - The proposal delivers an increase in public realm, as well as creating new landscaped areas and green spaces which includes the planting of 19 new trees. Overall, the proposed public realm, landscaping and planting is considered acceptable - Refer to Public Realm and Landscaping Sections of report for further detail.

Compliance with fire safety requirements

355. Officer response - The proposed development has been designed to meet the relevant fire guidance. A specialist Fire Safety Report by engineers at Hoare Lea has been prepared and submitted with the application and include a wide range of fire safety measures have been incorporated into the proposal. Overall, the proposal complies with fire safety requirements – refer to Fire Safety Section of this report.

Insufficient cycle parking

356. Officer response - The proposal complies with cycle parking provision of the London Plan – refer to Transport Section of this report.

Closure of Southwark Underground Station during construction

357. Officer response - A Construction Management Plan (CEMP) prepared by MACE was submitted with the Application which confirms that Southwark Underground Station will remain operational throughout the construction of the proposed development. A detailed CEMP confirming this will be secured by way of a S106 Obligation.

Consultation responses from external and statutory consultees

358. Summarised below are the planning matters raised by external and statutory consultees. Matters are addressed within the relevant sections in the Assessment section of this report.

359. GLA - Greater London Authority (Stage 1):

- Land use principles: The principle of the mixed-use residential-led development is supported.
- Affordable housing: The proposal delivers 44 affordable housing units as 100% Social Rent, and a PiL of £15,685,000 for the PBSA. Given the PiL is not confirmed, and the scheme involves estate regeneration, the Viability Tested Route must be followed.
- Urban design and heritage: No strategic concerns are raised to the

principle of tall buildings on the site. A low level of less than substantial harm would be caused to heritage assets which must be outweighed by the benefits of the proposal.

- Transport: Further information is required on the Transport Assessment, car and cycle parking, travel plan, delivery and servicing, and construction logistics.
- Sustainability and environment: Further information is required on energy, circular economy, whole-life cycle carbon, green infrastructure, and water.

Officer response: Points regarding land use, urban design and heritage are noted. Further information has been submitted by the applicant, which is considered to adequately address the points made regarding transport, energy, and sustainability. Any information considered outstanding will be secured by way of condition/obligation.

With regard to affordable housing, the proposal exceeds a 50% affordable housing offer, including PIL payment which has been confirmed by the Applicant and will be secured in a legally binding agreement, and therefore, meets the Fast Track requirements of P1 of the Southwark Plan for not requiring a Financial Viability Assessment (FVA).

It is noted that London Plan Policy H8 E states that all estate redevelopments are required to follow a viability tested route and provide an uplift in housing as well as a replacement of existing housing. In this instance there is a significant increase in affordable social rented housing on the site as part of this estate redevelopment. In respect of the requirement for an FVA, the Southwark Plan does not require one when more than 40% affordable housing is provided on site. When two development plan policies conflict with each other than the most recent policy prevails. As such, Policy P1 of the Southwark Plan is the most up to date policy and is being met by the proposed development.

The provision of no affordable student accommodation is also considered acceptable as it maximises the affordable housing offer. Given more than 40% affordable is being provided, which meets Southwark "Fast track" threshold, a late-stage review would not be required.

360. HE - Historic England (Heritage): No objection noting that Southwark Underground Station is currently being assessed by Historic England for statutory listing and therefore, the position on these proposals could be subject to change depending on the outcome of that application.

Officer response: Noted.

361. ENVA - Environmental Agency: No objection. Recommends conditions relating to land contamination and management approaches relating to flood risk, drainage and piling to help minimise potential risks and ensure appropriate water management of the site.

Officer response: Noted and to be included as part of any planning permission.

362. NR - Network Rail: No comments

Officer response: Noted.

363. HSEFRE - HSE Fire Risk Assessment: Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, HSE has identified some matters that the applicant should try to address, in advance of later regulatory stages.

Officer response: Noted and recommended informative to be included as part of any planning permission.

364. NE - Natural England: No comments

Officer response: Noted.

365. TW - Thames Water: No objection subject to conditions.

Officer response: Conditions attached accordingly.

366. Transport for London (TfL): provided comments and recommendations regarding healthy streets, lighting, safety, bus stop accessibility, cycle parking, cycle hire docking station and student management plan.

Officer response: The Council's Transport Team have worked in detail with the Applicant to address these matters which has included the provision of a bus stop accessibility audit and updated cycle parking plans. With regard to healthy streets, public realm works and cycle docking station requirements, these will be secured by S106 payments as detailed in the Planning Obligations Section of this report. Similarly, a detailed student management plan will be secured by S106 Obligation.

367. TFL – Railway Infrastructure: No objection.

Officer response: Noted.

368. National Grid: No comments

Officer response: Noted.

369. Twentieth Century Society: Objection due to proposed demolition of interior fabric, including a central column, and harm caused to the high-quality interiors of the station and noting the following: "Would it not be possible to carry the load

of the OSD through the building elsewhere, without impacting so significantly of this key part of the interiors? It needs to be demonstrated that alternative locations for the supporting structure have been considered."

Officer response: The Applicant submitted a detailed response to the matters raised by Twentieth Century Society demonstrating that redistributing the loads from the OSD structure onto adjacent station columns is not viable due to the long spans of the required structure and residual capacity of adjacent elements. It was also noted that the adjacent columns have a limited capacity and could not bear the additional load of the OSD structure. The proposed new column will be designed to be as slim as possible and this will be the subject of the Listed Building Consent application, which will be submitted when/if the station is listed.

Overall, it has been demonstrated that the proposed works to the station, are limited in scope, will be carried out as sensitively as possible and would have been required as part of the originally approved OSD scheme, that the station was designed to accommodate from the outset. Furthermore, the works will be the subject of a separate Listed Building Consent application, which will be submitted when/if the station is listed. Their acceptability is not being determined as part of this current planning application for the proposed development above.

370. Metropolitan Police (Design out crime): No objection subject to conditions.

Officer response: Conditions attached accordingly.

371. Metropolitan Police: No objection. Request for a payment to mitigate the impacts of the development on the demand for Policing services and infrastructure.

Officer response: Requested payment could be covered by a S106 Obligation. However, the impact on Police services and infrastructure is mitigated through the CIL contribution.

372. HU DU (NHS): No objection. Request for a payment to mitigate the impacts of the development on the demand for primary care services.

Officer response: Contributions to NHS infrastructure would be made through CIL allocations.

373. Lambeth Council: No comments received; however, the acknowledgement letter noted that the works may require Building Control consent.

Officer response: Noted.

Community impact and equalities assessment

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

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

376. 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.

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

378. There are a range of potential impacts on the local community during construction and operation. Potential impacts in terms of infrastructure, environmental factors, amenity, accessibility, housing, employment creation and health have been discussed in detail in the relevant sections of this report and any necessary mitigation to limit adverse impacts has been secured through S106 Obligations and planning conditions (for example construction impacts will be minimised through the use of a CEMP).

379. The scheme will deliver 44 affordable homes thus presenting opportunities to enhance access to affordable residential accommodation for those with protected characteristics, in particular BAME communities as they are disproportionately affected by lack of access to affordable housing. The proposed development also includes 226sqm of community facilities which will be accessible to all members of the community and will provide benefit for those groups with protected characteristics. There will also be positive health benefits in terms of open space, play space, enhanced public realm and landscaping works. The positive impacts arising from the development would benefit those groups with protected characteristics as well as the wider community.

380. The proposed scheme has also been designed to ensure inclusive access for all, providing both accessible student and conventional residential homes. All public realm areas have appropriate gradients and slopes instead of steps wherever possible. The landscaped areas will incorporate appropriately designed benches and play equipment for a range of users. There is level access into the buildings and internally the design incorporates an appropriate provision of wheelchair accessible toilets, lifts, wide corridors, doors and circulation areas. A blue badge space is also provided for the Residential Building in addition to the 3 existing spaces benefiting Styles House.

381. It is considered that no groups with protected characteristics would be harmed by the proposed development and that suitable provisions have been made as part of the redevelopment of the site to benefit those groups with protected characteristics as well as the wider community.

382. Overall, 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

383. 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.

384. This application has the legitimate aim of providing a new mixed-use development. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive statement

385. 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.

386. 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.

387. **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	YES

advice given followed?	
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

388. The redevelopment of the site is supported through the site allocation. The scheme will deliver 25.9% affordable housing on site all as social rented, with a further 26.9% being provided by way of s106 PIL payment which will achieve a total affordable level of 52.8%. In addition, it provides 226sqm of community facilities and 123sqm of retail/café uses with active frontages to The Cut and Blackfriars Road as required by the site allocation. This makes a significant contribution to addressing the boroughs great need to deliver affordable housing. In addition, the scheme would provide student housing in an appropriate location which is considered to contribute positively to a mixed and inclusive neighbourhood.

389. Whilst the amount of housing proposed is greater than the indicative capacity of the site, and the site would only provide limited commercial space. As set out in the report the land use mix is considered to be acceptable and would not compromise the delivery of the Southwark Plans aspirations to create new jobs as set out in policy ST1. In addition the design, scale and massing of the development is considered to be acceptable. The development would sit comfortably in the CAZ / townscape and not cause harm to adjoining heritage assets. Whilst there would be some harms to neighbouring amenity in terms of daylight and sunlight, these are relatively limited.

390. The scheme would make contributions to mitigating its impact on local services through its CIL payments. In addition, s106 contributions would also be made to secure carbon off-set, training and apprenticeships, bus service improvements, London signage, cycle hire docking stations, s278 improvement works to Joan Street and car club provision.

391. The benefits associated with the proposed redevelopment of the site are summarised below:

- Optimise and reuse brownfield land.
- Contribute towards the identified housing requirement with an equivalent of 215 homes to help meet the Borough's housing targets.
- Provide 44 high quality social rent affordable homes which would be owned and managed by the council, a significant increase over the 25 council homes secured by the previous planning permission.
- Deliver family sized housing with 15 three bedroom and 1 four-bedroom homes.

- Reduce pressure on the private rented market from students, and provide safe, well maintained and well managed PBSA.
- Activate the space either side of the Station entrance with the retail kiosks on both sides of the Station entrance helping to activate Blackfriars Road and The Cut.
- Deliver a community facility for the benefit of the Styles House residents and the local community.
- Retention of Joan Street.
- Improve pedestrian facilities with widened pavements and improved and enlarged raised crossings.
- Extend the Low Line with improvements to Isabella Street between Blackfriars Road and Joan Street, introducing planting, better addressing the change in levels and providing an active frontage at its eastern end.
- Create new public realm.
- Deliver additional greening along Isabella Street, The Cut, west of Joan Street out to Hatfield Street, on the roofs and in the new community garden shared with Styles House.
- Achieve a 368.04% Biodiversity Net Gain, in excess of the 10% required.
- Provide enlarged gardens for Styles House
- Improve Santander cycle hire docking facilities
- Deliver economic benefits with jobs within the retail units and in the running, maintenance and security of the PBSA, as well as jobs and training during the construction stage of the project.

392. It is therefore recommended that planning permission be granted, subject to conditions, the timely completion of a S106 Agreement and referral to the Mayor of London.

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Environmental, 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 0254 Council website: www.southwark.gov.uk

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

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth
Report Author	Chirag Bhavan, Planning Officer
Version	Final
Dated	25 February 2025
Key Decision	No

CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER

Officer Title	Comments Sought	Comments included
Strategic Director, Finance	No	No
Strategic Director, Environment, Neighbourhoods and Growth	No	No
Strategic Director, Housing	No	No
Date final report sent to Constitutional Team		21 February 2025

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.

Applicant	Mr Elliot Saunders Platinum Southwark Limited	Reg. Number	24/AP/2770
Application Type	Major application	Case Number	PP-13336576
Recommendation			

Draft of Decision Notice

for the following development:

Demolition and redevelopment to provide a purpose built student accommodation building of 15 storeys (plus basement and rooftop plant) with retail and/or café uses within Use Class E on the ground floor, and a residential building of 9 storeys (plus rooftop plant) to accommodate the required affordable housing within Use Class C3, with community uses within Use Class F1 on the ground floor; together with cycle parking, refuse/recycling storage, servicing, improvements to Joan Street, landscaping and other works.

Southwark Underground Station The Cut London Southwark

In accordance with application received on 23 September 2024 and Applicant's Drawing Nos.:

Existing Plans

Proposed Plans

PROPOSED FLOOR PLANS - PBSA BUILDING LEVEL 01 22206-AHMM-AA-01-DR-A-P0101 REV P03 received 02/01/2025

PROPOSED FLOOR PLAN - PBSA BUILDING GROUND FLOOR LEVEL 22206-

AHMM-AA-GF-DR-A-P0100. REV P03 received 02/01/2025

PROPOSED FLOOR PLANS - PBSA BUILDING LEVELS 05, 11 22206-AHMM-AA-ZZ-DR-A-P0105 REV P02 received 02/01/2025

PROPOSED FLOOR PLANS - PBSA BUILDING LEVELS 03, 07, 09, 13 22206-AHMM-AA-ZZ-DR-A-P0107. REV P02 received 02/01/2025

PROPOSED WEST ELEVATION - PBSA BUILDING (JOAN STREET 22206-AHMM-AA-ZZ-DR-A-P0202 - REV P02 received 02/01/2025

PROPOSED FLOOR PLAN - PBSA BUILDING LEVEL 14 22206-AHMM-AA-14-DR-A-P0114. REV P02 received 02/01/2025

PROPOSED FLOOR PLAN - PBSA BUILDING BASEMENT LEVEL 22206-AHMM-AA-B1-DR-A-P0099 REV P03 received 02/01/2025

PROPOSED FLOOR PLANS - PBSA BUILDING LEVELS 04, 06, 08, 10, 12 22206-AHMM-AA-ZZ-DR-A-P0106 - REV P02 received 02/01/2025

PROPOSED FLOOR PLANS - PBSA BUILDING LEVELS 04, 06, 08, 10, 12 22206-AHMM-AA-ZZ-DR-A-P0250.- REV P02 received 02/01/2025

PROPOSED NORTH ELEVATION 22206-AHMM-ZZ-ZZ-DR-A-P0203- REV P02 received 02/01/2025

PROPOSED EAST ELEVATION (BLACKFRIARS ROAD 22206-AHMM-ZZ-ZZ-DR-A-P0201- REV P02 received 02/01/2025

PROPOSED SOUTH ELEVATION (THE CUT) 22206-AHMM-ZZ-ZZ-DR-A-P0200- REV P02 received 02/01/2025

PROPOSED WEST ELEVATION - AFFORDABLE HOUSING 22206-AHMM-BB-ZZ-DR-A-P0202 REV P02 received 02/01/2025

PROPOSED EAST ELEVATION - AFFORDABLE HOUSING (JOAN STREET 22206-AHMM-BB-ZZ-DR-A-P0201- REV P02 received 02/01/2025

PROPOSED FLOOR PLAN - AFFORDABLE HOUSING LEVEL 03 04 & 06 22206-AHMM-BB-ZZ-DR-A-P0103 REV P02 received 02/01/2025

PROPOSED FLOOR PLAN - AFFORDABLE HOUSING GROUND FLOOR LEVEL 22206-AHMM-BB-GF-DR-A-P0100 REV P02 received 02/01/2025

PROPOSED FLOOR PLAN - AFFORDABLE HOUSING LEVEL 08 22206-AHMM-BB-08-DR-A-P0108 REV P02 received 02/01/2025

PROPOSED FLOOR PLAN - AFFORDABLE HOUSING LEVEL 08 22206-AHMM-BB-07-DR-A-P0107 REV P02 received 02/01/2025

PROPOSED FLOOR PLAN - AFFORDABLE HOUSING LEVEL 02 22206-AHMM-BB-02-DR-A-P0102. REV P02 received 02/01/2025

PROPOSED FLOOR PLAN - AFFORDABLE HOUSING LEVEL 01 & 05 22206-AHMM-BB-01-DR-A-P0101 REV P02 received 02/01/2025

PROPOSED WEST ELEVATION - PBSA BUILDING (JOAN STREET) 22206-AHMM-

Other Documents

LANDSCAPE GENERAL ARRANGEMENT PLAN SWK-SGB-ZZ-EW-PL-L-001001 received 19/12/2024

LANDSCAPE GENERAL ARRANGEMENT PLAN. SWK-SGB-ZZ-EW-PL-L-001001 received 20/12/2024

PROPOSED ROOF PLAN - PBSA BUILDING (LOW LEVEL) 22206-AHMM-AA-15-DR-A-P0115 - REV P02 received 02/01/2025

PROPOSED ROOF PLAN - PBSA BUILDING (HIGH LEVEL) 22206-AHMM-AA-RF-DR-A-P0116. REV P02 received 02/01/2025

PROPOSED SECTION 01 PBSA (NORTH - SOUTH) 22206-AHMM-AA-ZZ-DR-A-P0302 - REV P02 received 02/01/2025

PROPOSED SECTION 02 PBSA (STATION ENTRANCE) 22206-AHMM-AA-ZZ-DR-A-P0303 REV P02 received 02/01/2025

PROPOSED LONG SECTION EAST - WEST (PBSA + AFFORDABLE HOUSING 22206-AHMM-ZZ-ZZ-DR-A-P0301 received 02/01/2025

SITE PLAN - PROPOSED 22206-AHMM-ZZ-ZZ-DR-A-P0002- REV P02 received 02/01/2025

LOCATION PLAN - PROPOSED 22206-AHMM-ZZ-ZZ-DR-A-P0001 - REV P01 received 02/01/2025

PROPOSED SECTION 01 NORTH - SOUTH (AFFORDABLE HOUSING) 22206-AHMM-BB-ZZ-DR-A-P0301 - REV P02 received 02/01/2025

PROPOSED TYPICAL BAY STUDIES AFFORDABLE HOUSING 22206-AHMM-BB-ZZ-DR-A-P0251 REV P02 received 02/01/2025

PROPOSED RESIDENTIAL UNIT TYPES M4 (V3) 22206-AHMM-BB-XX-DR-A-P0052. REV P02 received 02/01/2025

PROPOSED RESIDENTIAL UNIT TYPES M4 (V2) 22206-AHMM-BB-XX-DR-A-P0051. REV P02 received 02/01/2025

PROPOSED ROOF PLAN - AFFORDABLE HOUSING 22206-AHMM-BB-RF-DR-A-P0109 REV P02 received 02/01/2025

Time limit for implementing this permission and the approved plans

2. The development hereby permitted shall be begun before the end of three

years from the date of this permission.

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

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

3. No development shall take place until a detailed Circular Economy Statement in line with the GLA's Circular Economy Statement Guidance is submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the details so approved.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials as required by the National Planning Policy Framework (2023); Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan (2021) and Policy P6 (Reducing waste) Policy P70 (Energy) of the Southwark Plan (2022).

4. Prior to the occupation of the development details of any additional measures required to prevent any of the units within these blocks from overheating shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the details thereby approved, and any mitigation measures required shall be provided at no expense to the occupiers prior to the occupation of the affected units and maintained as such thereafter. Guidance on avoiding overheating shall be provided to occupiers of the affected units in perpetuity.

Reason: In the interests of the amenity of future occupiers, in accordance with SI4 (Managing heat risk) of the London Plan 2021 and Policy P15 (Residential design) and of the Southwark Plan (2022).

5. No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units and details of flow control measures. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance, as detailed in the Flood Risk Assessment and Drainage Strategy Report prepared by Heyne Tillet Steel (dated 28/11/2024). The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows. The site drainage must be constructed to the approved details.

Reason: To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017) and Policy SI 13 of the London Plan (2021).

6. No development shall take place, including any works of demolition, until a written CEMP has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to construction site management and to use all best endeavours to minimise off-site impacts, and will include the following information:
 - o A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures.
 - o Site perimeter continuous automated noise, dust and vibration monitoring.
 - o Engineering measures to eliminate or mitigate identified environmental impacts e.g. hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.;
 - o Arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, resident's liaison meetings, etc.)
 - o A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme; Site traffic - Routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;
 - o Site waste Management - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations.
 - o A commitment that all NRMM equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated by the Mayor of London

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

- o Southwark Council's Technical Guide for Demolition & Construction at <http://www.southwark.gov.uk/construction>
- o Section 61 of Control of Pollution Act 1974,
- o The London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition',

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

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

Reason: To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with the National Planning Policy Framework (2023) and Policy P50 (Highway impacts), Policy P56 (Protection of amenity), Policy P62 (Reducing Waste), Policy P64 (Contaminated land and hazardous substances), Policy P65 (Improving air quality) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

7. No demolition or construction works shall begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site has been 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 construction of this development. The development shall not be carried out otherwise than in accordance 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 Framework (2023), Policy T1 (Strategic Approach to Transport), Policy T4 (Assessing and Mitigating Transport Impacts), Policy T7 (Deliveries, Servicing and Construction) and Policy SI 1 (Improving Air Quality) of the London Plan (2021) and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

Further information and guidance is available at
<http://content.tfl.gov.uk/construction-logistics-plan-guidance-for-developers.pdf>

8. Prior to any demolition hereby approved, details of a Demolition Noise and Vibration Management Plan shall be submitted to and approved in writing by the Local Planning Authority for that phase.
 The development shall only be demolished in accordance with the approved Demolition Noise and Vibration Management Plan which shall include:
 - A detailed specification of demolition works including consideration of all environmental impacts and the identified remedial measures, including continuous monitoring of noise and airborne particulates.
 - Engineering measures to eliminate or mitigate identified environmental impacts e.g. acoustic screening, sound insulation, dust control, emission reduction, location of specific activities on site, etc.;
 - Arrangements for direct responsive contact for nearby occupiers with the site management during demolition and/or construction (signage on hoardings, newsletters, resident's liaison meetings);
 - 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, lay off areas, etc.;
 - Waste Management - Accurate waste identification, separation, storage, registered waste carriers for transportation and disposal to appropriate destinations.
 To follow current best construction practice, including the following:
 - Southwark Council's Technical Guide for Demolition & Construction 2016, available from <http://southwark.gov.uk/air-quality/the-main-causes-of-air-pollution>.
 - S61 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',
 - 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 Stage emission standards to comply with Non-Road Mobile

- Relevant CIRIA and BRE practice notes.

All demolition work shall then be undertaken in strict accordance with the plan and 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 (2023) and Policy P50 (Highway impacts), Policy P56 (Protection of amenity), Policy P62 (Reducing Waste), Policy P64 (Contaminated land and hazardous substances), Policy P65 (Improving air quality) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

9. Prior to the commencement of above ground works of the development, and notwithstanding the cycle store layouts shown on the submitted drawings, full details of the cycle parking facilities (including cross sections, with aisle widths and floor to ceiling heights clearly labelled) shall be submitted to and approved by the Local Planning Authority for each Phase or Building. Provision shall be made for a minimum of 429 spaces across all Phases.
Reason - To promote sustainable travel and to ensure compliance with Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2023); Policy T5 (Cycling) of the London Plan (2021) and Policy P53 (Cycling) of the Southwark Plan (2022).
10. Prior to the installation of any hard landscaping, soft landscaping, vehicular route, parking, loading bay, footway or cycleway commencing for a Phase of the development, details of the layout and design of any vehicular route, parking, pedestrian and vehicular sight lines, loading bays, footway or cycleway relevant to the development, shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall show (where relevant) the alignment, widths, gradients, surfacing arrangements, kerbs, bays for parking/loading/deliveries, forward visibility sight lines and visibility splays, speed restraint measures, access controls, turning heads, emergency vehicle and service vehicle access and gradients in respect of the relevant part of the development. This shall include the layout, its width, surfacing, bays, access controls, forward visibility sight lines and visibility splays. Each Phase or Building of the development shall then be constructed in accordance with the approved details.
Reason: To ensure that the detailed design provides sufficient vehicle manoeuvring and visibility in the interest of public safety and to ensure that the

detailed design of the vehicular routes, footways, pedestrian routes and public squares would avoid vehicle/pedestrian conflict in accordance with London Plan (2021) Policies D5 (inclusive design), D8 (Public realm), T1 (Strategic approach to transport), T4 (Assessing and mitigating transport impacts) and T5 (Cycling), and Southwark Plan (2022) Policies P50 (Highways impacts), P51 (Walking) and P53 (Cycling).

11. Details of Bee bricks and/or invertebrate hotels shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.

No less than 6 Bee bricks and/or invertebrate hotels shall be provided, and the details shall include the exact location, specification and design of the habitats. Bee bricks and/or invertebrate hotels shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

The Bee bricks and/or invertebrate hotels shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the invertebrate features and mapped locations and the Local Planning Authority agreeing the submitted plans, and once the invertebrate features are installed in full in accordance to the agreed plans.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the National Planning Policy Framework (2023); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

12. Details of bat tubes, bricks or boxes shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.

No less than 3 bat tubes, bricks or boxes shall be provided, and the details shall include the exact location, specification and design of the habitats. The bat tubes, bricks or boxes shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the

space in which they are contained.

The bat tubes, bricks or boxes shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the roost features and mapped locations and the Local Planning Authority agreeing the submitted plans, and once the roost features are installed in full in accordance to the agreed plans.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the National Planning Policy Framework (2023); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

13. Prior to the commencement of development, a detailed method statement for the removal or long-term management /eradication of identified invasive plants on the site shall be submitted to and approved in writing by the Local Planning Authority. The method statement shall include proposed measures to prevent the spread of identified invasive plants during any operations such as mowing, strimming or soil movement. It shall also contain measures to ensure that any soils brought to the site are free of the seeds / root / stem of any invasive plant covered under the Wildlife and Countryside Act 1981. Development shall proceed in accordance with the approved method statement.

Reasons: the spread of invasive species is prohibited under the Wildlife and Countryside Act (1981). Without measures to prevent its spread as a result of the development there would be the risk of an offence being committed and avoidable harm to the environment occurring.

14. Details of six bird boxes shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.

No less than two house sparrow terraces, two swift boxes, one open fronted bird box and one bird box with a 32mm entrance hole shall be provided. Details shall include the exact location, specification and design of the bird boxes. The boxes shall be installed in suitable locations on mature trees or on buildings prior to the first occupation of the site.

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

Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and the Local Planning Authority agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with National Planning Policy Framework (2023); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022)

15. Prior to works commencing, including any demolition, an Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority.
 - a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal.
 - b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.
 - c) Cross sections shall be provided to show surface and other changes to levels, special engineering, foundation or construction details and any proposed activity within root protection areas or the influencing distance (30m) of local trees required in order to facilitate demolition, construction and excavation.

16. Prior to the occupation of the development or any phase of the development, whichever is the sooner, a landscape management plan, including long term design objectives to meet BNG requirements, management responsibilities and maintenance schedules for all landscape areas, other than small, privately owned, domestic gardens, shall be submitted to and approved by the Local Planning Authority.

Details of an irrigation schedule shall be provided for all trees to ensure successful establishment.

For stem girths of up to 20cm the schedule shall be a minimum of three years, and five years for stem girths greater than 20cm. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

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.

Works shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 8545 (2014) Trees: from nursery to independence in the landscape; BS3998: (2010) Tree work - recommendations; BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 01:2021 (EN) -Tree Pruning Standard; EAS 03:2022 (EN) - Tree Planting Standard.

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), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

17. Prior to the Superstructure works commencing, a waste and recycling strategy shall be submitted to and approved in writing by the Local Planning Authority. This shall set out the location, design and accessibility of refuse stores, details of the separation of waste and collection arrangements, storage of bulky waste and any chute systems or waste compactors. The waste and recycling strategy shall be implemented as approved, unless otherwise agreed in writing

by the Local Planning Authority. The development shall be constructed in accordance with the approved details, the waste management facilities made available for use prior to the first occupation, and managed and operated in accordance with the approved strategy for all uses in perpetuity.

Reason: To ensure adequate refuse storage is provided on site and can be readily collected, in accordance with Policies SI 7 (Reducing waste and supporting the circular economy) and SI 8 (Waste capacity and net waste self-sufficiency) of the London Plan (2021) and Policies P50 Highways impacts, P56 (Protection of amenity) and P62 (Reducing waste) of the Southwark Plan (2022).

18. Residential - Internal noise levels ' pre approval

The dwellings 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 L Aeq T*, 45dB LAFmax T *

Living and Dining rooms- 35dB LAeq T †

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

† - Daytime - 16 hours between 07:00-23:00

A report shall be submitted in writing to and approved by the LPA detailing acoustic predictions and mitigation measures to ensure the above standards are met. Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample of premises. The results shall be submitted to the LPA for approval in writing. The approved scheme shall be implemented and permanently maintained 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 in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

19. Residential Vertical sound transmission between potentially loud commercial and residential properties on new build

The habitable rooms within the development sharing a party ceiling/floor element with commercial premises shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that noise due to the commercial premises does not exceed NR20 when measured as an LAeq across any 5 minute period. The development shall be carried out in accordance with the approval given. Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample of premises. The results shall be submitted to the LPA for approval in writing and the approved scheme shall be

permanently maintained thereafter.

Reason

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

20. Noise from amplified music from non-residential premises - pre approval
 A scheme of sound insulation shall be installed to ensure that the LFmax sound from amplified and non-amplified music and speech shall not exceed the lowest L90 5min at 1m from the facade of nearby residential premises at all third octave bands between 63Hz and 8kHz. Prior to the commencement of use of the commercial premises the proposed scheme of sound insulation shall be submitted to the local planning authority for approval. The scheme of sound insulation shall be constructed and installed in accordance with the approval given and shall be permanently maintained thereafter. Following completion of the development and prior to the commencement of use of the commercial premises, a validation test shall be carried out. The results shall be submitted to the LPA for approval in writing.

Reason

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

21. The Rated sound level from any plant, together with any associated ducting, shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014+A1:2019.
 Suitable acoustic treatments shall be used to ensure compliance with the above standard. A validation test shall be carried out and the results submitted to the Local Planning Authority for approval in writing to demonstrate compliance with noise levels criteria outlined in the Noise and Vibration Impact Assessment Report (Ref: QA23395/NIA, Quantum Acoustics Ltd, dated 01 August 2024). Once approved the plant and any acoustic treatments shall be permanently maintained thereafter.

Reason

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

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

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

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

Reason

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

23. Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILP) Guidance Note 1 for the reduction of obtrusive light (2021). Details of any external lighting (including: design; power and position of luminaries; light intensity contours) of all affected external areas (including areas beyond the boundary of the development) shall be submitted to and approved by the Local Planning Authority in writing before any such lighting is installed. The development shall not be carried out otherwise than in accordance with any such approval given. Prior to the external lighting being used, a validation report shall be submitted to the LPA for approval in writing.

Reason

In order that the Council may be satisfied as to the details of the development

in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with the Southwark Plan 2022 Policy P16 (Designing out crime); Policy P56 (Protection of amenity), and the National Planning Policy Framework 2021.

24. Site Contamination - pre-approval

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

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

c) In the event that contamination is found that presents a risk to future users or controlled waters or other receptors, a detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing. The strategy shall detail all proposed actions to be taken to bring the site to a condition suitable for the intended use together with any monitoring or maintenance requirements. The scheme shall also ensure that as a minimum, the site should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out and implemented as part of the development.

d) Following the completion of the works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed, together with any future monitoring or maintenance requirements shall be submitted to and approved in writing by the Local Planning Authority.

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

Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters,

property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances), and the National Planning Policy Framework 2021.

25. **Land Contamination 1**

Prior to each phase of development approved by this planning permission no development shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:

- 1 A preliminary risk assessment which has identified:
- 2 all previous uses
- 3 potential contaminants associated with those uses
- 4 a conceptual model of the site indicating sources, pathways and receptors
- 5 potentially unacceptable risks arising from contamination at the site

1. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.
2. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
3. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reason

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution, in line with the National Planning Policy Framework (NPPF) (paragraph 180).

26. Prior to each phase of development being occupied, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason

To ensure that the site does not pose any further risk to the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 180 of the National Planning Policy Framework

27. Piling using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall 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 in line with paragraph 180 of the National Planning Policy Framework. To prevent pollution of groundwater within underlying Principal and Secondary aquifers

28. Prior to commencement of any works (with the exception of demolition to ground level and archaeological investigations), 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 for the lifetime of the development.

Reason: To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness, in accordance with the National Planning Policy Framework (2023); Policy SI 6 (Digital Connectivity Infrastructure) of the London Plan (2021) and Policy P44 (Broadband and digital infrastructure) of the Southwark Plan (2022).

29. Prior to commencement of works for a relevant Phase of the development (excluding the Enabling Works Phase, Basement Levels Phase and the Listed Buildings Phase), the applicant must submit to the Local Planning Authority an

updated roof layout drawing to demonstrate that PV generation has been maximised for that Phase of the development. This should include the provision of bio-solar PV on green roof areas that are not for communal access purposes. The development shall be implemented in accordance with the approved details.

Reason: In the interests of sustainable development and in accordance with London Plan (2021) Policies SI 2 (Minimising greenhouse gas emissions) and SI 3 (Energy infrastructure) and Policy P70 (Energy) of the Southwark Plan (2022).

30. No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height (5m AGL), radius and start/finish dates for the use of cranes during the Development. Upon completing the initial assessment based on the information requested, these cranes will require to be assessed against LCA's safeguarding surfaces. The information described above must be submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport.

Reason: The use of cranes or tall equipment in this area has the potential to impact LCA operations and safeguarding surfaces, therefore they must be assessed before construction.

Permission is subject to the following Grade Condition(s)

31. Prior to the commencement of above grade work, details of wind mitigation measures at the ground level; to achieve suitable wind conditions for the public spaces in the central space, the Yards, the new play space and Christ Church Gardens; based on the Lawson Comfort Criteria shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be installed prior to the first use of these buildings and retained as such thereafter.

Reason: In the interests of amenity and safety, in accordance with Policy D9 (Tall buildings) of the London Plan (2021); Policy P14 (Design quality), Policy P17 (Tall buildings) and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

32. 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 shall be submitted to and approved in writing by the Local Planning Authority. The site shall be landscaped strictly in accordance with the approved details in the first planting season after completion of the development. Details shall include:

- 1) a scaled plan showing all existing vegetation and landscape features to be retained with proposed trees, hedging, perennial and other plants;
- 2) proposed parking, access, or pathway layouts, materials and edge details;
- 3) location, type and materials to be used for hard landscaping including specifications, where applicable for:
 - 4) permeable paving
 - 5) tree pit design
 - 6) underground modular systems
 - 7) sustainable urban drainage integration
 - 8) use within tree Root Protection Areas (RPAs);
 - 9) typical cross sections;
- 10) a schedule detailing sizes and numbers/densities of all proposed trees/plants;
- 11) specifications for operations associated with plant establishment and maintenance that are compliant with best practise; and
- 12) types and dimensions of all boundary treatments.

There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees unless agreed 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. Any trees, shrubs, grass or other planting 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.

Unless required by a separate landscape management condition, all soft landscaping shall have a written five-year maintenance programme following planting.

Works shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction; BS3998: (2010) Tree work - recommendations, BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 03:2022 (EN) - Tree Planting Standard.

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), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

- 33. 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.

- 34. 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, 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.

35. Full-scale mock-ups of the facades shall be presented on site 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.

36. To be used Prior to the commencement of above grade works, a Parking Design and Management Plan detailing how an additional (1) wheelchair accessible parking space to serve the wheelchair accessible residential units could be provided shall be submitted to and approved in writing by the Local Planning Authority. Any of the spaces which are onsite shall be safeguarded for future use by occupiers of the wheelchair accessible units if required.

Reason: To ensure that there would be adequate provision for wheelchair accessible parking spaces, in accordance with Policy T6.1 (Residential parking) of the London Plan (2021) and Policy P55 (Parking standards for disabled people and the physically impaired) of the Southwark Plan (2022).

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

37. (a) The development hereby approved shall achieve a BREEAM rating of 'Excellent' or higher, and shall achieve no less than the total credits for each of the Energy, Materials and Waste categories in the BREEAM Pre-Assessment hereby approved.

(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 'Excellent' standard as outlined within the submitted BREEAM pre-assessment report have been met.

Reason: To ensure the proposal complies with the National Planning Policy Framework (2023); Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan (2021) and Policy P69 (Sustainability standards) and (Policy P70 (Energy) of the Southwark Plan (2022).

38. Prior to the occupation of the development the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. The Post-Construction Assessment should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the development.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in compliance with the National Planning Policy Framework (2023); Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan 2021 and Policy P70 (Energy) of the Southwark Plan (2022).

39. The development hereby approved shall achieve Passivhaus certification or an equivalent independent measure of energy performance and sustainability. Post completion Passivhaus certification (or equivalent certification), issued by an independent third-party assessor, that confirms that the development has been completed in accordance with all Passivhaus performance criteria shall be submitted to the Local Planning Authority for approval within three months of first occupation of the development.

Reason: To ensure the development minimises its operational carbon dioxide emissions and achieves the highest levels of sustainable design and construction in accordance with Policy P70 (Energy) in the Southwark Plan (2022).

40. Prior to the occupation of the development, a Post Construction Monitoring Report should be completed in line with the GLA's Circular Economy Statement Guidance. The Post Construction Monitoring Report shall be submitted to the GLA, currently via email at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with Policy P62 (Reducing waste) of the Southwark Plan 2022

41. Drainage Strategy - Verification Report

No dwelling shall be occupied until a drainage verification report prepared by a suitably qualified engineer has been submitted to and approved in writing by the Local Planning Authority. The 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 Flood Risk Assessment and Drainage Strategy Report prepared by Heyne Tillet Steel (dated [28/11/2024]) and shall 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. The report shall also include details of the responsible management company.

Reason: To ensure the surface water drainage complies with Southwark's Strategic Flood Risk Assessment and Policy SI 13 of the London Plan (2021).

42. Before the first occupation of the development hereby approved, the Blue Badge parking arrangements (compliant to current Southwark design standards) as shown on the drawings hereby approved shall be provided and made available to the users of the development. Thereafter, such facilities shall be retained and maintained in perpetuity.

Reason: To meet the requirements of Policy T6.1 (Residential Parking) of the London Plan (2021) and Policy P55 (Parking standards for disabled people and the physically impaired) of the Southwark Plan (2022)

43. Prior to first occupation of the development hereby permitted a Delivery and Service Management Plan detailing how all elements of the site are to be serviced shall be submitted to and approved by the Local Planning Authority. The servicing of the development shall be carried out in accordance with the approval given and the Service Management Plan shall remain extant for as long as the development is occupied.

Reason: To ensure compliance with the National Planning Policy Framework (2023); Policy P49 (Public transport); Policy P50 (Highways impacts); Policy P51 (Walking) of the Southwark Plan (2022)

44. Prior to the first occupation, a Car Parking Management Plan relating to the relevant building shall be submitted to and approved in writing by the relevant Local Planning Authority, and must include at least the following details:

- (a) the proposed allocation of and arrangements for the management of parking spaces including disabled parking bays. Details such as number and location shall be referenced.
- (b) the provision of active Electric Vehicle Charging Points (EVCP), to every parking space in accordance with adopted London Plan. Details such as number and location shall be referenced.

The car parking shall be provided and managed in accordance with the approved strategy for the life of the development, or as otherwise agreed in writing by the Local Planning Authority.

Reason - Car parking management must be identified prior to the first occupation of development to ensure that sufficient off-street parking areas are provided and appropriately allocated and not to prejudice the free flow of traffic or conditions of general safety along the adjoining highway in accordance with the National Planning Policy Framework (2023); Policy T6 (Car parking) of the London Plan (2021); Policies P54 (Car parking) and P55 (Parking standards for disabled people and the physically impaired) of the Southwark Plan (2022).

45. Before the first occupation of the development hereby approved, the cycle facilities (including cycle storage, showers, changing rooms and lockers where appropriate) as shown on the drawings hereby approved shall be provided and made available to the users of the development. Thereafter, such facilities shall be retained and maintained in perpetuity.

Reason: To ensure that satisfactory safe and secure bicycle parking is provided and retained for the benefit of the users and occupiers of the building in order to encourage the use of alternative means of transport and to reduce reliance on the use of the private car in accordance with the National Planning Policy Framework (2023); Policy T5 (Cycling) of the London Plan (2021); and Policy P53 (Cycling) of the Southwark Plan (2022).

46.

- a) Before the first occupation of the building hereby permitted commences, the applicant shall submit in writing and obtain the written approval of the Local Planning Authority to a Travel Plan written in accordance with TfL best guidance at the time of submission, setting out the proposed measures to be taken to encourage the use of modes of transport other than the car by all users of the building, including staff and visitors.

- b) At the start of the second year of operation of the approved Travel Plan, a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.
- c) At the start of the fifth year of operation of the approved Travel Plan a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

Reason: In order that the use of non-car based travel is encouraged in accordance with the National Planning Policy Framework (2023); Policy T6 (Car parking) of the London Plan (2021); Policy P54 (Car parking) of the Southwark Plan (2022).

- 47. Prior to first occupation of each relevant Phase, a scheme for monitoring the effectiveness of the biodiversity mitigation and enhancement measures for that Phase shall be submitted to and approved by the Local Planning Authority. The monitoring should include annual protected species surveys of created receptor habitats, botanical surveys of created habitats invertebrate surveys of the gravel piles and use of bird and bat boxes. The monitoring shall be carried out and reported to the Local Planning Authority in accordance with the agreed scheme for a period of 30 years. Surveys should be undertaken in years 1, 3, 5, 7, 10, 15, 20, 25 and 30 following first occupation. Species results will be submitted to the London Biological Records Centre, Greenspace Information for Greater London (GIGL).
Reason: To comply with the Biodiversity Net Gain requirements of the Environment Act 2021. To measure the effectiveness of biodiversity enhancement measures, to see whether the measures achieve the expected biodiversity gains.
- 48. Prior to occupation, the completed schedule of site supervision and monitoring of the arboricultural protection measures as approved in tree protection condition shall be submitted for approval in writing by the Local Planning Authority. This condition may only be fully discharged on completion of the development, subject to satisfactory written evidence of compliance through contemporaneous supervision and monitoring of the tree protection throughout construction by the retained project or pre-appointed tree specialist.

Works shall comply to BS: 5837 (2012) Trees in relation to demolition, design and construction; BS3998: (2010) Tree work - recommendations; BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 01:2021 (EN) - Tree Pruning Standard; EAS 02:2022 (EN) - Tree Cabling/Bracing Standard; EAS 03:2022 (EN) - Tree Planting Standard.

Reason: To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with the National Planning Policy Framework (2023) Chapters 7 (Ensuring the vitality of town centres), 8 (Promoting healthy and safe communities), 11 (Making effective use of land), 12 (Achieving well-designed places), Chapter 14 (Meeting the challenge of climate change), and chapters 15 & 16 (Conserving and enhancing the natural and historic environment); Policy 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), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

- 49. The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the local planning authority prior to commencement of the development and shall be implemented in accordance with the approved details prior to occupation.
- 50. Prior to occupation a satisfactory Secured by Design inspection must take place. The resulting Secured by Design certificate shall be submitted to and approved by the local planning authority.

Permission is subject to the following Compliance Condition(s)

- 51. Following completion of the development, obstacle lights shall be placed on the highest parts of the buildings above the Podium Phase during the construction of those Phases (which construct above the Podium Phase) and following completion of the construction. These obstacle lights must be steady state red lights with a minimum intensity of 2000 candelas. Periods of illumination of obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with the requirements of regulation CS ADR-DSN Chapter Q 'Visual Aids for Denoting Obstacles'

Reason: Permanent illuminated obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

52. 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 Council.

Reason: To ensure such works do not detract from the appearance of the building (s) in accordance with The National Planning Policy Framework (2023); Policy D4 (Delivering good design) of the London Plan (2021) and Policy P13 (Design of places) and Policy P14 (Design quality) of the Southwark Plan (2022).

53. Notwithstanding the drawings hereby approved, no door shall open outwards over the public highway, public footway or any part of the publicly-accessible realm with the exception of fire escape access.

Reason: In order that the footway is kept clear of clutter to facilitate the unobstructed movement of pedestrians, including wheelchair users and the mobility impaired, having regard to the high levels of pedestrian footfall in this location, in accordance with the National Planning Policy Framework (2023); Policy P13 (Design of places) and Policy P51 (Walking) of the Southwark Plan (2022).

54. The development hereby approved shall be carried out in full accordance with the approved overheating strategy including installation of all passive and/or active measures to prevent overheating prior to first occupation of the development. The approved passive and/or active measures to prevent overheating shall be retained and maintained for the lifetime of the development.

Reason: To ensure the development is designed and operated to minimise the risk of internal overheating and is an energy efficient building in accordance with Policy SI4 (Managing heat risk) in the London Plan (2021), Policy P69 (Sustainability standards) in Southwark Plan (2022).

55. The development must be designed to ensure that 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.

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 Southwark Plan 2022 Policy P56 (Protection of amenity), and the National Planning Policy Framework 2021.

56. Any deliveries or collections to the commercial units shall only be between the following hours: 08.00 ' 20.00hrs on Mondays to Saturdays and 10.00 ' 16.00hrs on Sundays & Bank Holidays.

Reason

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

57. The development hereby approved shall be carried out in accordance with the recommendations of the Fire Statement, unless a revised Fire Statement is submitted to and approved in writing by the Local Planning Authority prior to the relevant works being carried out.

Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with policies D5 (Inclusive design) and D12 (Fire safety) of the London Plan (2021).

58. The proposed development is located within 15 metres of a strategic sewer. No piling shall take place until a **PILING METHOD STATEMENT** (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Thames Water would advise that with regard to WASTE WATER NETWORK

and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

59. The proposed development is located within 15m of a strategic water main. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan.

Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water.

Email:developer.services@thameswater.co.uk Phone: 0800 009 3921
(Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid

potential fines for improper usage. More information and how to apply can be found online at [thameswater.co.uk/buildingwater](https://www.thameswater.co.uk/buildingwater).

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

60. Where any application is made to discharge a condition on a partial basis (i.e. part of), the submission shall be accompanied by a statement setting out the relationship of such details to previous parts of, the details of which have already been determined, and subsequent Buildings/Phases as appropriate. The statement shall demonstrate compliance and compatibility with the various details, strategies, drawings and other documents approved pursuant to this planning permission. The statement shall be submitted to the Local Planning Authority as part of any partial or phased discharge of planning conditions

Reason: To ensure that the scheme is implemented on a comprehensive and sustainable basis in accordance with Chapter 1 (Planning London's Future - Good Growth) of the London Plan (2021), Strategic Policies SP1-SP6 of the Southwark Plan and the NPPF (2023).

Informatics

0 With respect to any proposals for piling through made ground, we would refer you to the EA guidance document "Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on

Pollution Prevention" (NGWCL Centre Project NC/99/73). We suggest that approval of piling methodology is further discussed with the EA when the guidance has been utilised to design appropriate piling regimes at the site.

- 0 All wild birds, nests, eggs and young are protected under the Wildlife & Countryside Act 1981 (as amended). The grant of planning permission does not override the above Act. All applicants and sub-contractors are reminded that persons undertaking site clearance, hedgerow removal, demolition works etc. between March and August may risk committing an offence under the above Act and may be liable to prosecution if birds are known or suspected to be nesting. The Council will pass complaints received about such work to the appropriate authorities for investigation. The Local Authority advises that such work should be scheduled for the period 1 September-28 February wherever possible. Otherwise, a qualified ecologist should make a careful check before work begins.

Appendix 2: Relevant Planning Policy

National Planning Policy Framework (NPPF)

The revised National Planning Policy Framework ('NPPF') was published in December 2023 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 02 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications. The particularly relevant chapters from the Framework are:

- Section 2 - Achieving sustainable development
- Section 5 – Delivering a sufficient supply of homes
- Section 6 - Building a strong, competitive economy
- Section 8 - Promoting healthy and safe communities
- Section 9 - Promoting sustainable transport
- Section 11 - Making effective use of land
- Section 12 - Achieving well-designed and beautiful places
- Section 14 - Meeting the challenge of climate change, flooding and coastal change
- Section 15 - Conserving and enhancing the natural environment
- Section 16 - Conserving and enhancing the historic environment

The London Plan 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:

- The London Plan is the regional planning framework and was adopted on March 2nd 2021. The most relevant policies are those listed below.
- Good Growth 1 - Building strong and inclusive communities
- Good Growth 2 - Making the best use of land
- Good Growth 3 - Creating a healthy city
- Good Growth 4 - Delivering the homes Londoners need
- Good Growth 5 - Growing a good economy
- Good Growth 6 - Increasing efficiency and resilience
- Policy SD1 - Opportunity Areas
- Policy SD10 - Strategic and local regeneration
- Policy D1 - London's form, character and capacity for growth
- Policy D3 - Optimising site capacity through the design-led approach

- Policy D4 - Delivering good design
- Policy D5 - Inclusive design
- Policy D6 - Housing quality and standards
- Policy D7 - Accessible housing
- 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 H10 – Housing size mix
- Policy S1 – Developing London’s social infrastructure
- Policy S4 - Play and informal recreation
- Policy S6 - Public toilets
- Policy E1 - Offices
- Policy E2 - Providing suitable business space
- Policy E3 - Affordable workspace
- 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 HC5 - Supporting London’s culture and creative industries
- Policy HC6 - Supporting the night-time economy
- 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 T6.5 - Non-residential disabled persons parking
- Policy T7 - Deliveries, servicing and construction
- Policy T9 - Funding transport infrastructure through planning

Southwark Plan 2022

The Southwark Plan 2022 was adopted on 23 February 2022. The plan provides strategic policies, development management policies, area visions and site allocations which set out the strategy for managing growth and development across the borough from 2019 to 2036. The relevant policies are:

- ST1 Southwark's Development Targets
- SP1 – Homes for all
- SP2 – Southwark together
- SP3 – A great start in life
- SP4 – Green and inclusive economy
- SP5 – Thriving neighbourhoods and tackling health inequalities
- SP6 – Climate emergency
- P1 – Social rented and intermediate housing
- P2 – New family homes
- P8 – Wheelchair accessible and adaptable housing
- P13 – Design of places
- P14 – Design quality
- P15 – Residential
- 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
- P26 – Local List
- P28 – Access to employment and training
- P30 – Office and business development
- P31 – Affordable workspace
- P32 – Small shops
- P33 – Business relocation
- P35 – Town and local centres
- P39 – Shop fronts
- P44 – Broadband and digital infrastructure
- P45 – Healthy developments
- P46 – Leisure arts and culture
- P47 – Community uses
- P49 – Public transport
- P50 – Highways impacts
- P51 – Walking
- P53 – Cycling
- P54 – Car parking

- P56 – Protection of amenity
- P59 – Green infrastructure
- P60 – Biodiversity
- P61 – Trees
- P64 – Contaminated land and hazardous substances
- P65 – Improving air quality
- P66 – Reducing noise pollution and enhancing soundscapes
- P67 – Reducing water use
- P68 – Reducing flood risk
- P69 – Sustainability standards
- P70 – Energy
- IP1 – Infrastructure
- IP2 – Transport infrastructure
- IP3 – Community infrastructure levy (CIL) and Section 106 planning obligations
- IP6 – Monitoring development
- IP7 – Statement of Community Involvement
- NSP20 – Southwark Station and 1 Joan Street
- Also of relevance in the consideration of this application is the Sustainable Design and Construction SPD (2008) and the Heritage SPD 2021.

Appendix 3 - Planning History

1 Site History:

Ref No.	Decision/ Date	Site address	Description
24/AP/2354	19.12.2024	Southwark Undergroun d Station	Request for an EIA Screening Opinion for redevelopment of the site for two new buildings of nine and 15 storeys with building services plant located at roof level including purpose-built student accommodation (Sui Generis), affordable housing (Use Class C3) as well as ancillary floorspace, café/retail units, associated landscaping and public realm improvements.
23/AP/0610	05.06.2023	Southwark Undergroun d Station	Partial discharge of Condition 8 'Construction Method Statement' (for the demolition of building G (Platform Building) and building H (Chalets) only) pursuant to planning permission ref. 20/AP/1189 (Redevelopment of the site including the demolition of Nos. 49-56 Hatfields and No 1 Joan Street to provide an 17 storey (plus plant) building above Southwark Underground Station accommodating Class B1 office space and Class A1/A2/A3/A4 retail space. The development includes associated basement construction, public realm improvements and associated highways works including the closure of Joan Street).
23/AP/0592	07.06.2023	Southwark Undergroun d Station	Partial discharge of Condition 7 'Site contamination parts a) to c) for the demolition of building G (Platform Building) and building H (Chalets) only, pursuant to planning permission ref. 20/AP/1189 (Redevelopment of the site including the demolition of Nos. 49-56 Hatfields and No 1 Joan Street to provide an 17 storey (plus plant) building above Southwark Underground Station accommodating Class B1 office

			space and Class A1/A2/A3/A4 retail space. The development includes associated basement construction, public realm improvements and associated highways works including the closure of Joan Street).
22/AP/3529	25.01.2023	Southwark Underground Station	Details of condition 44 Whole Life-Cycle Carbon Assessment pursuant to planning permission ref. no. 20/AP/1189: Redevelopment of the site including the demolition of Nos. 49-56 Hatfields and No 1 Joan Street to provide an 17 storey (plus plant) building above Southwark Underground Station accommodating Class B1 office space and Class A1/A2/A3/A4 retail space. The development includes associated basement construction, public realm improvements and associated highways works including the closure of Joan Street.
22/AP/3281	06.10.2022	Southwark Underground Station	Nonmaterial amendment of planning permission ref. no. 20/AP/1189: Redevelopment of the site including the demolition of Nos. 49-56 Hatfields and No 1 Joan Street to provide an 17 storey (plus plant) building above Southwark Underground Station accommodating Class B1 office space and Class A1/A2/A3/A4 retail space. The development includes associated basement construction, public realm improvements and associated highways works including the closure of Joan Street. The amendment seeks to exclude demolition to ground level from the trigger of Condition 6.
22/AP/3095	25.01.2023	Southwark Underground Station	Details of Condition 45 ((Fire Strategy), as required by planning permission 20/AP/1189 dated 22/06/2022 for - Redevelopment of the site including the demolition of Nos. 49-56 Hatfields and No 1 Joan Street to provide an 17 storey (plus plant) building above Southwark Underground Station accommodating Class B1 office space and Class A1/A2/A3/A4 retail space. The development includes associated basement construction, public realm improvements and associated highways works

			including the closure of Joan Street.
22/AP/2919	20.09.2022	Southwark Underground Station	Non material amendment of planning permission ref. no 20/AP/1189 (Redevelopment of the site including the demolition of Nos. 49-56 Hatfields and No 1 Joan Street to provide an 17 storey (plus plant) building above Southwark Underground Station accommodating Class B1 office space and Class A1/A2/A3/A4 retail space. The development includes associated basement construction, public realm improvements and associated highways works including the closure of Joan Street). Changes are sought to condition 9: 'Arboricultural Method Statement' and condition 12: 'Contamination Scheme' to allow demolition of the Styles House Chalets, the Ecocycle and the Platform Building to be carried out ahead of the full discharge of condition 9 and condition 12.
20/AP/1189	22.06.2022	Southwark Underground Station	Redevelopment of the site including the demolition of Nos. 49-56 Hatfields and No 1 Joan Street to provide an 17 storey (plus plant) building above Southwark Underground Station accommodating Class B1 office space and Class A1/A2/A3/A4 retail space. The development includes associated basement construction, public realm improvements and associated highways works including the closure of Joan Street.
19/AP/5845	21.11.2019		Screening Opinion in relation to proposals for commercial office and retail Over-Station Development (OSD)
12/AP/3022	12.11.2012	Southwark Underground Station	Replacement of existing stairway with a ramp to provide improved access to the docking station on the roof of Southwark London Underground Station.

11/AP/3351	12.12.2011	Outside Southwark Underground Station The Cut London SE1	Erection of 1 x free-standing, internally illuminated 6-Sheet Advertising Panel measuring 1472mm in width and 2746mm in height.
11/AP/1077		TFL Cycle Hire At Southwark Underground Station Adjacent To Blackfriars Road And Joan Street London SE1	Non-material amendment to planning permission reference: 10-AP-3600 dated 25/02/2011 for 'Installation of a surface mounted cycle hire docking station, for the Transport for London Cycle Hire Scheme containing a maximum of 84 docking points for scheme bicycles plus two terminals and two sets of steps with wheel channels' comprising the relocation of one of the two approved terminals (adjacent to Joan Street).

Appendix 4: Consultation undertaken

Site notice date: n/a.

Press notice date: 24/10/2024

Case officer site visit date: n/a

Neighbour consultation letters sent: 17/12/2024

Internal services consulted

LBS Highways Development & Management

Flood Risk Management & Urban Drainage Team

LBS Ecology Officer

LBS Network Developments Construction Management Plans

LBS Planning Policy [Formal Consultation] - General

LBS Waste Management Team

LBS Urban Forester

LBS Transport Policy Team

LBS Design And Conservation Team [Surgery Consultation]

LBS Transport Policy Team

LBS Archaeologist

LBS Design And Conservation Team [Formal Consultation]

LBS Local Economy

LBS Ecology Officer

LBS Highways Development & Management

LBS Highways Licensing

LBS Housing Regeneration And Delivery Division

Flood Risk Management & Urban Drainage Team

LBS Urban Forester

LBS Waste Management Team

LBS S106 Team

LBS CCTV - Public Space Surveillance

LBS Community Infrastructure Team

LBS Planning Policy [Surgery]

LBS Building Control Division

LBS Environmental Protection Team

Statutory and non-statutory organisations

Twentieth Century Society

London Borough Of Lambeth

HSE Fire Risk Assessments

Transport For London

National Grid UK Transmission

Environment Agency

Greater London Authority

HE - Heritage

London Fire & Emergency Planning Authority

London Underground
 Natural England - London Region & South East Region
 Network Rail
 Metropolitan Police Service (Designing Out Crime)
 Transport For London
 Transport For London
 Thames Water
 HSE Fire Risk Assessments

Neighbour and local groups consulted:

43B The Cut London Southwark	Street
43A The Cut London Southwark	Ground Floor 17 Short Street London
43C The Cut London Southwark	Part Second Floor St Andrews Church
51C The Cut London Southwark	Hall 4 - 15 Short Street
51B The Cut London Southwark	Ground Floor 25 Short Street London
51A The Cut London Southwark	49B The Cut London Southwark
51 The Cut London Southwark	47A The Cut London Southwark
Company Wine Bar 53 The Cut London	45B The Cut London Southwark
53A The Cut London Southwark	47C The Cut London Southwark
53B The Cut London Southwark	45C The Cut London Southwark
53C The Cut London Southwark	Flat 1 Milton House Short Street
47B The Cut London Southwark	47 The Cut London Southwark
21 Short Street London Southwark	Ground Floor 19 Short Street London
Flat 3 Milton House Short Street	Part First Floor St Andrews Church Hall
Flat 13 Theatre View Apartments 19	4 - 15 Short Street
Short Street	Flat 14 Theatre View Apartments 19
Flat 5 Theatre View Apartments 19 Short	Short Street
Street	Flat 12 Theatre View Apartments 19
St Andrews Church Hall 4 - 15 Short	Short Street
Street London	Flat 10 Theatre View Apartments 19
Basement And Rear Of 25 Short Street	Short Street
London	Flat 8 Theatre View Apartments 19 Short
49C The Cut London Southwark	Street
49A The Cut London Southwark	Flat 7 Theatre View Apartments 19 Short
45A The Cut London Southwark	Street
Flat 2 Milton House Short Street	Flat 3 Theatre View Apartments 19 Short
49 The Cut London Southwark	Street
Part First Floor And Part Second Floor St	Flat 2 Theatre View Apartments 19 Short
Andrews Church Hall 4 - 15 Short Street	Street
Flat 4 Theatre View Apartments 19 Short	St Andrews Vicarage Short Street
Street	London
Flat 1 Theatre View Apartments 19 Short	Tmo Hall Styles House Hatfields
Street	Third Floor 209 - 215 Blackfriars Road
Flat 11 Theatre View Apartments 19	London
Short Street	Unit 6 200 Blackfriars Road London
Flat 9 Theatre View Apartments 19 Short	Unit B02 79 - 80 Blackfriars Road
Street	London
Flat 6 Theatre View Apartments 19 Short	79 - 80 Blackfriars Road London

Southwark
 Railway Arch 85 Scoresby Street London
 Flat 2 Styles House Hatfields
 Southwark College For Further
 Education The Cut London
 Fifth Floor 209 - 215 Blackfriars Road
 London
 Flat 20 Vaughan House Nelson Square
 Flat 29 Vaughan House Nelson Square
 Flat 50 Vaughan House Nelson Square
 Flat 41 Styles House Hatfields
 Flat 30 Styles House Hatfields
 Flat 28 Styles House Hatfields
 Excluding Part Ground Part First Floor
 And Sixth Floor Palestra House 197
 Blackfriars Road
 Flat 4 75 - 76 Blackfriars Road London
 Flat 2 84 Blackfriars Road London
 Third Floor Flat 81 Blackfriars Road
 London
 8 Ring Court The Cut London
 Flat 44 Styles House Hatfields
 Flat 11 Styles House Hatfields
 6 Ring Court The Cut London
 Third Floor Flat 77 Blackfriars Road
 London
 9 Brinton Walk London Southwark
 10 Brinton Walk London Southwark
 Flat 42 Vaughan House Nelson Square
 Flat 25 Vaughan House Nelson Square
 Basement Front 82 - 83 Blackfriars Road
 London
 Living Accommodation 72 Blackfriars
 Road London
 Flat 37 The Cut London
 2A Burrows Mews London Southwark
 Part First Floor Palestra House 197
 Blackfriars Road
 35B The Cut London Southwark
 Third Floor 82 - 83 Blackfriars Road
 London
 Flat 1 75 - 76 Blackfriars Road London
 Flat 42 Styles House Hatfields
 Flat 21 Styles House Hatfields
 2 Ring Court The Cut London
 41C The Cut London Southwark
 First Floor Flat 77 Blackfriars Road
 London
 Flat 56 Styles House Hatfields
 200 Blackfriars Road London Southwark
 Flat 3 75 - 76 Blackfriars Road London
 1C Burrows Mews London Southwark
 Flat 4 6 Burrows Mews London
 Flat 3 6 Burrows Mews London
 Flat 4 Garrett House Burrows Mews
 Second Floor 209 - 215 Blackfriars Road
 London
 Flat 6 Vaughan House Nelson Square
 Flat 48 Styles House Hatfields
 Flat 37 Styles House Hatfields
 12 Brinton Walk London Southwark
 Basement Flat 77 Blackfriars Road
 London
 Flat D 1C Burrows Mews London
 Flat 1 Vaughan House Nelson Square
 Flat 40 Vaughan House Nelson Square
 Flat 20 Styles House Hatfields
 Fourth Floor 82 - 83 Blackfriars Road
 London
 Railway Arches 97 To 99 Isabella Street
 London
 Fourth Floor Flat 1 The Cut London
 Flat 7 84 Blackfriars Road London
 Second Floor Flat 81 Blackfriars Road
 London
 Basement To Second Floor Great Surrey
 House 203 - 205 Blackfriars Road
 Flat 52 Styles House Hatfields
 Flat 47 Styles House Hatfields
 Flat 16 Styles House Hatfields
 Flat 53 Styles House Hatfields
 Flat 49 Vaughan House Nelson Square
 Flat 38 Vaughan House Nelson Square
 7 Rotherham Walk London Southwark
 Unit 1 200 Blackfriars Road London
 25 The Cut London Southwark
 Part 1 35 The Cut London
 Flat 2 75 - 76 Blackfriars Road London
 Basement 75 - 76 Blackfriars Road
 London
 Flat 5 6 Burrows Mews London
 Flat 1 Garrett House Burrows Mews
 Railway Arch 84 Scoresby Street London
 Flat 2 39 The Cut London
 Flat 23 Styles House Hatfields
 Flat 8 Styles House Hatfields
 85 Blackfriars Road London Southwark
 Flat 18 Styles House Hatfields

41 The Cut London Southwark
 Flat B 1C Burrows Mews London
 Ground Floor 82 - 83 Blackfriars Road
 London

9 Ring Court The Cut London
 Flat 38 Styles House Hatfields
 Flat 24 Styles House Hatfields
 39 The Cut London Southwark
 Flat 13 Styles House Hatfields
 Flat 7 Styles House Hatfields

2 Burrows Mews London Southwark
 13 Brinton Walk London Southwark
 Flat 47 Vaughan House Nelson Square
 Flat 30 Vaughan House Nelson Square
 Flat 28 Vaughan House Nelson Square
 Flat 13 Vaughan House Nelson Square
 17 Rotherham Walk London Southwark
 11 Rotherham Walk London Southwark
 10 Rotherham Walk London Southwark
 Studio Flat Ground Floor 77 Blackfriars
 Road London

First Floor 209 - 215 Blackfriars Road
 London

Flat 6 6 Burrows Mews London
 Flat 3 Garrett House Burrows Mews
 Fourth Floor 209 - 215 Blackfriars Road
 London

Flat 1 Loha House 1 Burrows Mews
 Unit Lg02 79 - 80 Blackfriars Road
 London

Basement Flat 81 Blackfriars Road
 London

Flat 51 Styles House Hatfields
 Flat 49 Styles House Hatfields
 First Floor 33 The Cut London
 Flat 1B 1 The Cut London
 Flat 50 Styles House Hatfields
 Flat 29 Styles House Hatfields
 Flat 14 Styles House Hatfields
 Flat A 33 The Cut London
 Flat 9 Styles House Hatfields

Flat 41 Vaughan House Nelson Square
 Flat 34 Vaughan House Nelson Square
 Flat 32 Vaughan House Nelson Square
 Flat 23 Vaughan House Nelson Square
 Flat 18 Vaughan House Nelson Square
 Basement Rear 82 - 83 Blackfriars Road
 London

Unit 5 200 Blackfriars Road London

First Floor Front 82 - 83 Blackfriars Road
 London

First Floor Rear 82 - 83 Blackfriars Road
 London

Flat 2A Vaughan House Nelson Square
 Railway Arches 94 To 95 Isabella Street
 London

Railway Arch 96 Joan Street London
 Ground Floor 85 Blackfriars Road
 London

Flat 2 Garrett House Burrows Mews
 Ground Floor Front First Floor And
 Second Floor 1 Joan Street London

Flat 3 Loha House 1 Burrows Mews
 Flat 2 Loha House 1 Burrows Mews
 Railway Arch 82 Scoresby Street London
 12 Rotherham Walk London Southwark

1 The Cut London Southwark
 Flat 3A Vaughan House Nelson Square
 Flat 55 Styles House Hatfields
 Unit 2 200 Blackfriars Road London

Flat 12 Styles House Hatfields
 Second Floor 82 - 83 Blackfriars Road
 London

5 Ring Court The Cut London
 Flat 24 Vaughan House Nelson Square
 202 Blackfriars Road London Southwark

Flat 46 Vaughan House Nelson Square
 Flat C 33 The Cut London

Flat 43 Vaughan House Nelson Square
 Flat 26 Vaughan House Nelson Square
 39A The Cut London Southwark

Flat 35 Vaughan House Nelson Square
 Flat 32 Styles House Hatfields

Flat 14 Vaughan House Nelson Square
 Flat 4 84 Blackfriars Road London

9 Rotherham Walk London Southwark
 Flat 1C 1 The Cut London

Flat 12 Vaughan House Nelson Square
 Flat 36 Styles House Hatfields

Flat 25 Styles House Hatfields
 Flat 15 Styles House Hatfields

Flat 43 Styles House Hatfields
 First Floor Flat 1 The Cut London

Flat 5 Styles House Hatfields
 Flat 40 Styles House Hatfields

Flat 31 Styles House Hatfields
 Flat 3 Styles House Hatfields

Flat 19 Styles House Hatfields

3 Ring Court The Cut London
 Second Floor Flat 77 Blackfriars Road
 London
 35A The Cut London Southwark
 Flat 9 Vaughan House Nelson Square
 Flat 8 Vaughan House Nelson Square
 Flat 51 Vaughan House Nelson Square
 Flat 21 Vaughan House Nelson Square
 15 Rotherham Walk London Southwark
 13 Rotherham Walk London Southwark
 Unit 4 200 Blackfriars Road London
 Kiosk 3 Blackfriars Road London
 First Floor Second Floor And Third Floor
 Flat 74 Blackfriars Road London
 Flat 2 6 Burrows Mews London
 4 Ring Court The Cut London
 Flat 54 Styles House Hatfields
 Flat 46 Styles House Hatfields
 Flat A 1C Burrows Mews London
 Part Ground Floor Palestra House 197
 Blackfriars Road
 First Floor Flat 81 Blackfriars Road
 London
 Ground Floor Flat 81 Blackfriars Road
 London
 7 Ring Court The Cut London
 78 Blackfriars Road London Southwark
 Flat 45 Styles House Hatfields
 Flat 35 Styles House Hatfields
 Flat 27 Styles House Hatfields
 Flat 26 Styles House Hatfields
 14 Brinton Walk London Southwark
 11 Brinton Walk London Southwark
 Flat 5 Vaughan House Nelson Square
 Flat 44 Vaughan House Nelson Square
 Flat 3 Vaughan House Nelson Square
 Flat 10 Vaughan House Nelson Square
 16 Rotherham Walk London Southwark
 Kiosk 2 Blackfriars Road London
 33 Hatfields London Southwark
 Flat C 1C Burrows Mews London
 Flat D 35A The Cut London
 Ground Floor Rear 1 Joan Street London
 Flat 19 Vaughan House Nelson Square
 3 - 11 The Cut London Southwark
 Second Floor Great Surrey House 203 -
 205 Blackfriars Road
 Unit G01 79 - 80 Blackfriars Road
 London

Unit 201 79 - 80 Blackfriars Road
 London
 Flat C 35A The Cut London
 The Ring 72 Blackfriars Road London
 Flat 27 Vaughan House Nelson Square
 Sixth Floor Palestra House 197
 Blackfriars Road
 Flat 8 84 Blackfriars Road London
 Flat 15 Vaughan House Nelson Square
 Post Office 52 Blackfriars Road London
 Flat 39 Vaughan House Nelson Square
 Flat 31 Vaughan House Nelson Square
 Flat 1 Styles House Hatfields
 Ground Floor 209 - 215 Blackfriars Road
 London
 Unit G02 79 - 80 Blackfriars Road
 London
 Unit 301 79 - 80 Blackfriars Road
 London
 Unit 202 79 - 80 Blackfriars Road
 London
 Unit 101 79 - 80 Blackfriars Road
 London
 Flat 1 39 The Cut London
 Flat 45 Vaughan House Nelson Square
 41A The Cut London Southwark
 Flat 17 Vaughan House Nelson Square
 14 Rotherham Walk London Southwark
 Flat 2 Vaughan House Nelson Square
 Flat B 33 The Cut London
 Kiosk 1 Blackfriars Road London
 Flat 22 Vaughan House Nelson Square
 1 Ring Court The Cut London
 Flat 39 Styles House Hatfields
 Flat 33 Styles House Hatfields
 Part 2 35 The Cut London
 Flat 6 Styles House Hatfields
 Flat 6 84 Blackfriars Road London
 Flat D 33 The Cut London
 Flat 4 Styles House Hatfields
 Flat 34 Styles House Hatfields
 Flat 22 Styles House Hatfields
 Flat 10 Styles House Hatfields
 37 The Cut London Southwark
 8 Brinton Walk London Southwark
 Flat 4 Vaughan House Nelson Square
 Flat 37 Vaughan House Nelson Square
 Flat 1 6 Burrows Mews London
 Flat 16 Vaughan House Nelson Square

Flat 11 Vaughan House Nelson Square
 8 Rotherham Walk London Southwark
 Basement 209 - 215 Blackfriars Road
 London
 Unit Lg01 79 - 80 Blackfriars Road
 London
 Unit B01 79 - 80 Blackfriars Road
 London
 Unit 401 79 - 80 Blackfriars Road
 London
 Railway Arch 86 Scoresby Street London
 Railway Arch 83 Scoresby Street London
 Ground Floor 74 Blackfriars Road
 London
 Flat 17 Styles House Hatfields
 Flat 1 84 Blackfriars Road London
 Flat 7 Vaughan House Nelson Square
 Ground Floor Flat 77 Blackfriars Road

London
 Unit 3 200 Blackfriars Road London
 5 Burrows Mews London Southwark
 Flat 5 75 - 76 Blackfriars Road London
 Basement And Ground Floor 33 The Cut
 London
 Flat 3 84 Blackfriars Road London
 Flat 5 84 Blackfriars Road London
 Third Floor Great Surrey House 203 -
 205 Blackfriars Road
 Microcell 47132 The Ring 72 Blackfriars
 Road
 Flat 36 Vaughan House Nelson Square
 Flat 33 Vaughan House Nelson Square
 Flat 48 Vaughan House Nelson Square
 41B The Cut London Southwark

Re-consultation:

Appendix 5: Consultation responses received

Internal services

LBS Ecology
LBS Planning Policy
LBS Urban Forester
LBS Transport Policy
LBS Design & Conservation Team [Surgery]
LBS Transport Policy
LBS Archaeology
LBS Ecology
LBS Urban Forester
LBS Section 106 Team
LBS Community Infrastructure Levy Team
policy surgery comments

Statutory and non-statutory organisations

Metropolitan Police Service
Transport for London

Neighbour and local groups consulted:

Flat 104 Rowland Hill House London
19 VAUGHAN HOUSE NELSON
SQUARE LONDON
25 Pine Walk Surbiton KT5 8NJ
222 Helen Gladstone House Nelson
Square SE1 0QB
85 Blackfriars Road London SE1 8HA
Flat 76 130 Webber Street London
25 Braque Building Ewer Street London
10 Styles House Hatfields London
Flat 19, Styles House, Hatfields London
SE1 8DF
8 STYLES HOUSE HATFIELDS
LONDON
139, Rowland Hill House Nelson Square
london
47 Styles House Hatfields SE1 8DF

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COMMITTEE:

PLANNING COMMITTEE (MAJOR APPLICATIONS) B

NOTE:

Original held in Constitutional Team; all amendments/queries to Gregory Weaver, Constitutional Team, Tel: 020 7525 3667

MUNICIPAL YEAR 2024-25

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Councillor Michael Situ	1		
Councillor Cleo Soanes	1		
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