

Application reference no.: 21/AP/0599

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

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

RECOMMENDATION

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

EXECUTIVE SUMMARY

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

outlet the Financial Times

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

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

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

BACKGROUND INFORMATION

Site location and description

12. The application site is an existing office building, formerly occupied by the Financial Times, on a 0.54 hectare broadly square-shaped plot of land located in the Borough and Bankside ward. It is bounded:

 - to the north by the Thames Path;
 - to the east by Red Lion Court, an office building constructed in the early 1990s;
 - to the south by Park Street; and
 - to the west by the elevated Southwark Bridge Road (A300), underneath which are a series of brick arches forming the base of Southwark Bridge.

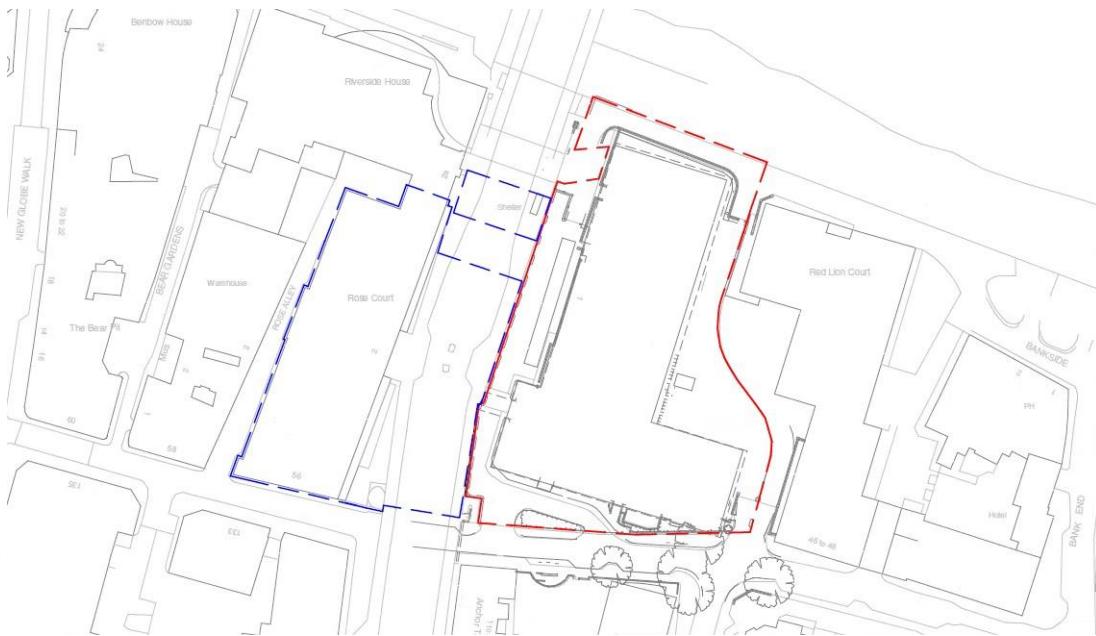


Figure 01 (above): Site location plan, showing the site boundary edged in red and other land within the applicant's ownership edged in blue.

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



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

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

Surroundings and designations

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

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

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

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

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

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

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

Details of proposal

Overview

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

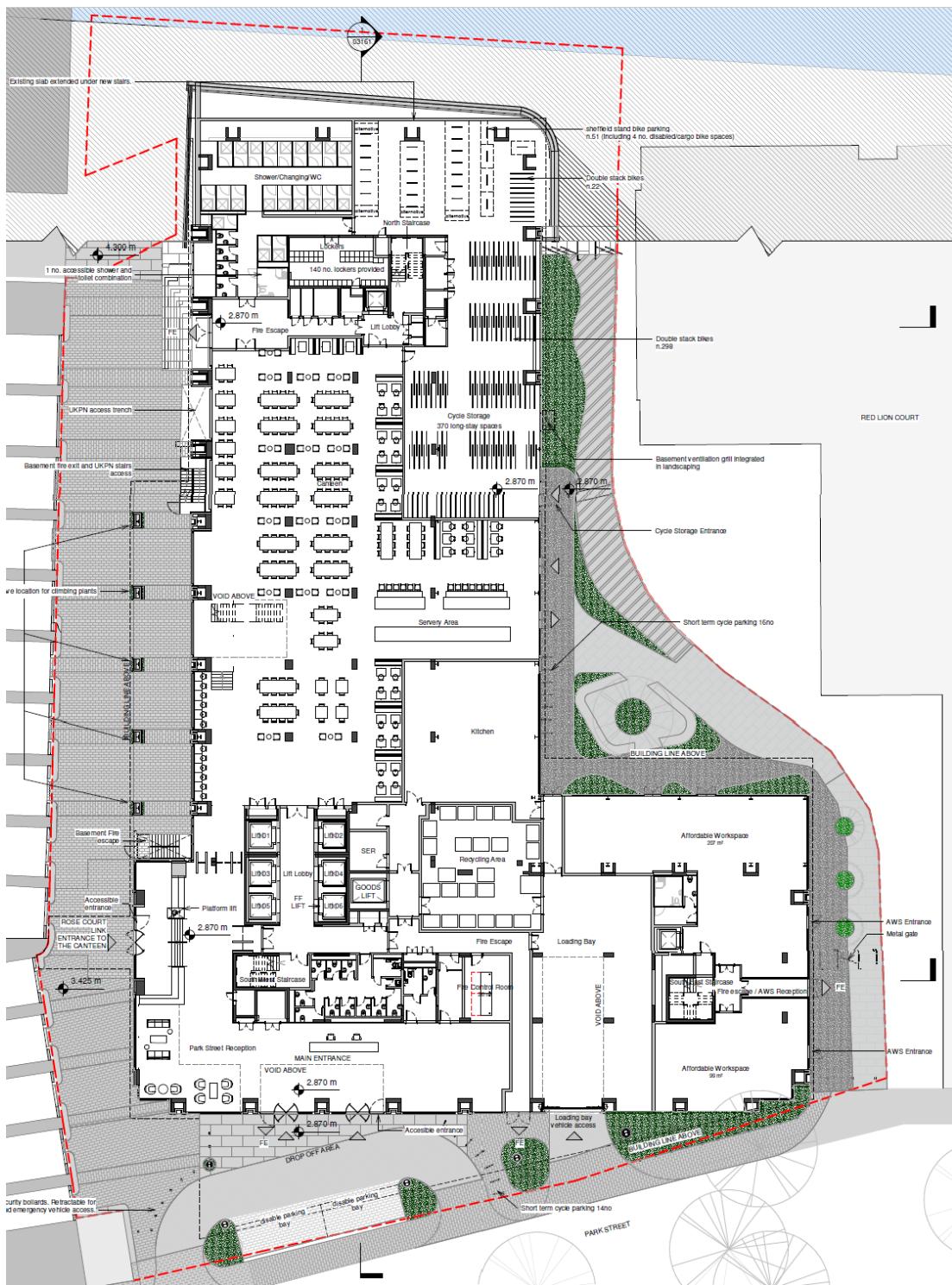


Figure 03 (above): Ground floor layout of the proposed development, including the landscaping of the surrounding external spaces.

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

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

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



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

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



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



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

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



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

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



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

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

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

Planning history of the application site and nearby sites

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

Pre-application engagement and mid-application amendments

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

Other relevant land ownership considerations

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

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

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

KEY ISSUES FOR CONSIDERATION

Summary of main issues

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

Legal Context

54. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021, the Core Strategy 2011, and the Saved Southwark Plan 2007. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.
55. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Adopted planning policy

National Planning Policy Framework (NPPF)

56. The revised National Planning Policy Framework ('NPPF'), published on 20 July 2021, sets out the national planning policy and how this should be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. At its heart is a presumption in favour of sustainable development.
57. Paragraph 2 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.
58. The relevant chapters of the NPPF are:
 - Chapter 2 - Achieving sustainable development
 - Chapter 6 - Building a strong, competitive economy
 - Chapter 8 - Promoting healthy and safe communities
 - Chapter 9 - Promoting sustainable transport
 - Chapter 11 - Making effective use of land
 - Chapter 12 - Achieving well-designed places
 - Chapter 14 - Meeting the challenge of climate change, flooding and coastal change
 - Chapter 15 - Conserving and enhancing the natural environment
 - Chapter 16 - Conserving and enhancing the historic environment

London Plan 2021

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

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

Relevant London-level Supplementary Planning Documents/Guidance and Strategies

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

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

Core Strategy 2011

63. The Core Strategy provides the spatial planning strategy for the borough. The relevant policies of the Core Strategy 2011 are:
- Strategic Targets Policy 1 - Achieving growth
 - Strategic Targets Policy 2 - Improving places
 - Strategic Policy 1 - Sustainable development
 - Strategic Policy 2 - Sustainable transport
 - Strategic Policy 3 - Shopping, leisure and entertainment
 - Strategic Policy 10 - Jobs and businesses
 - Strategic Policy 11 - Open spaces and wildlife
 - Strategic Policy 12 - Design and conservation
 - Strategic Policy 13 - High environmental standards

Southwark Plan 2007 (saved policies)

64. With the exception of Policy 1.8 (Location of retail outside town centres), the Council resolved in 2013 to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated by the Core Strategy. Paragraph 219 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. The relevant saved policies of the Southwark Plan 2007 are:
- Policy 1.1 - Access to employment opportunities
 - Policy 1.4 - Employment sites outside the POLs and PILs
 - Policy 1.7 - Development within town and local centres

- Policy 2.5 - Planning obligations
- Policy 3.1 - Environmental effects
- Policy 3.2 - Protection of amenity
- Policy 3.3 - Sustainability assessment
- Policy 3.4 - Energy efficiency
- Policy 3.6 - Air quality
- Policy 3.7 - Waste reduction
- Policy 3.8 - Waste management
- Policy 3.9 - Water
- Policy 3.11 - Efficient use of land
- Policy 3.12 - Quality in design
- Policy 3.13 - Urban design
- Policy 3.14 - Designing out crime
- Policy 3.15 - Conservation of the historic environment
- Policy 3.18 - Setting of listed buildings, conservation areas and world heritage sites
- Policy 3.19 - Archaeology
- Policy 3.20 - Tall buildings
- Policy 3.22 - Important local views
- Policy 3.28 - Biodiversity
- Policy 3.29 - Development within the Thames Policy Area
- Policy 3.31 - Flood defences
- Policy 5.1 - Locating developments
- Policy 5.2 - Transport impacts
- Policy 5.3 - Walking and cycling
- Policy 5.6 - Car parking
- Policy 5.7 - Parking standards for disabled people and the mobility impaired
- Policy 5.8 - Other parking

Relevant Local-level Supplementary Planning Documents

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

Relevant Conservation Area Appraisals

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

- Thrale Street (2012)

Emerging planning policy

New Southwark Plan

67. The New Southwark Plan (NSP) is now at an advanced stage. The NSP was submitted to the Secretary of State in January 2020. The Examination in Public (EiP) for the NSP took place between February and April 2021. The Inspectors wrote a post hearings letter on 28 May 2021 and under Section 20(7)(c) of the Planning and Compulsory Purchase Act (2004) the Council asked the Inspectors to recommend Main Modifications to ensure the Plan is sound. The Council is consulting on the Main Modifications as recommended by the Inspectors from 6 August 2021 to 24 September 2021. The Inspectors will write a report once the consultation has concluded and they have had the opportunity to consider representations.

68. It is anticipated that the plan will be adopted later in 2021 and will replace the saved policies of the Southwark Plan 2007, the Core Strategy 2011, the Aylesbury Area Action Plan 2010, the Peckham and Nunhead Area Action Plan 2014 and the Canada Water Area Action Plan 2015.

69. Paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.

70. The Inspectors have heard all the evidence submitted at the Hearings and in previous stages of consultation. The Main Modifications comprise the changes to policies the Inspectors consider are needed to ensure the Plan is sound.

71. The most relevant policies of the NSP are as follows:

- Policy P12 - Design of places
- Policy P13 - Design quality
- Policy P15 - Designing out crime
- Policy P16 - Tall buildings
- Policy P17 - Efficient use of land
- Policy P19 - Conservation areas
- Policy P22 - Archaeology
- Policy P23 - World heritage sites

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

Site allocation

72. The NSP includes a number of ‘Site Allocations’. Site Allocations are detailed development management policies specific to particular potential redevelopment sites in the borough. They specify, among other things, the land uses and development capacity of those sites. The application site, together with adjacent Red Lion Court, is subject to draft Site AllocationNSP05. This is discussed in more detail in the ‘Principle of Development’ section of this report.

Summary on emerging policy

73. The NSP responds positively to the NPPF by incorporating area visions, development management policies and 82 site allocations which plan for the long term delivery of housing. The NSP responds to rapid change which is occurring in Southwark and London as a whole, and responds positively to the London Plan 2021.

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

ASSESSMENT

Consultation summary

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

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

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

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

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

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

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

Environmental impact assessment

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

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

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

Principle of the proposed development in terms of land use

Existing lawful land use

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

Designations

London Bridge, Borough and Bankside Opportunity Area

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

Central Activities Zone

90. The site is located within the CAZ which covers a number of central London boroughs and is London's geographic, economic, and administrative core. The London Plan, and in particular Policy SD1, recognises the well-established long term demand for office space within the CAZ and promotes office provision within this policy area.
91. Strategic Targets Policy 2 of the Core Strategy requires development in the CAZ to support the continued success of London as a world-class city while also protecting and meeting the more local needs of the residential neighbourhoods. It also states that within the CAZ there will be new homes, office space, shopping and cultural facilities, as well as improved streets and community facilities.

London Bridge District Town Centre

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

Bankside, Borough and London Bridge Strategic Cultural Area

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

Emerging Bankside and Borough Area Vision

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

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

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

Assessment of conformity with designations

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

Draft site allocation

Background to NSP Site Allocation NSP05

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

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

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

Assessment of conformity with draft site allocation

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

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

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

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

Proposed mix of uses

Office Use

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

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

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

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



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

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

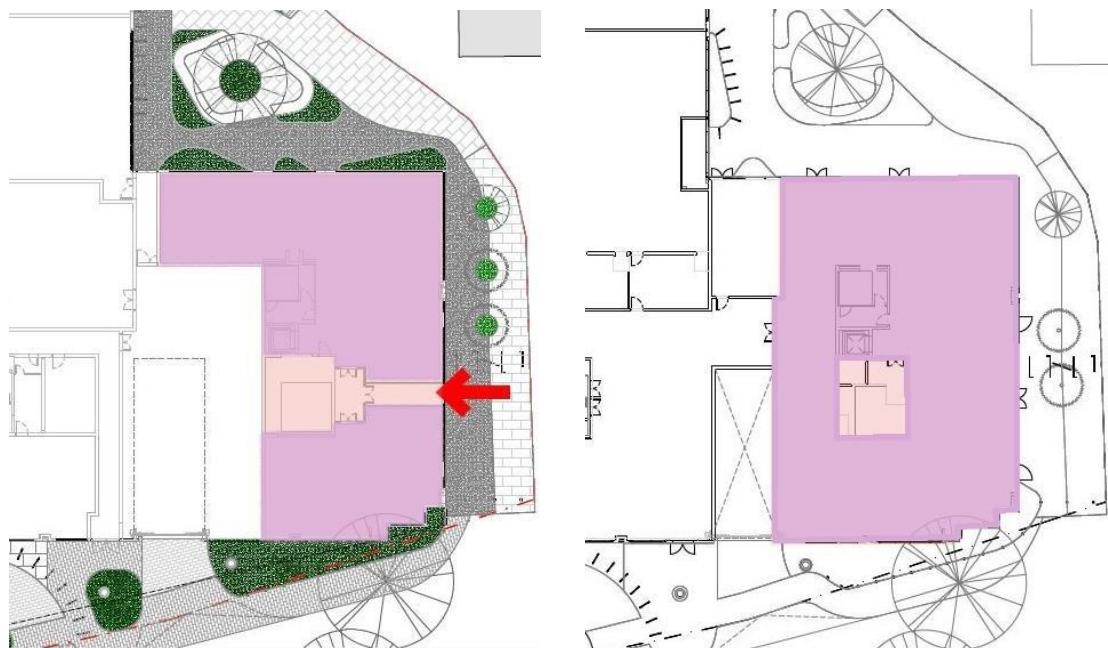
Affordable workspace

110. Policy E2 of the London Plan requires large-scale development proposals to incorporate flexible workspace suitable for micro, small and medium sized enterprises. Policy E3 deals specifically with affordable workspace. The policy states “In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose”. The policy identifies the circumstances in which it would be appropriate to secure affordable space. Part B of the policy specifically identifies the CAZ as an important location for securing low cost space for micro, small and medium sized enterprises.
111. Policy P30 of the emerging New Southwark Plan deals with affordable workspace. Criterion 2 of the policy requires major development proposals to deliver at least 10% of the gross new employment floorspace as affordable workspace on site at a discounted market rent for a period of at least 30 years. The policy recognises that there are many different forms that such space could take depending on the site location, characteristics, the nature of local demand and existing/proposed uses. As set out in Clause 5 of the policy, for extensions to buildings or changes of use, the policy applies to the new floorspace created if the extension or change of use is over 500 square metres.
112. The total quantum of proposed market and affordable office floorspace within the development is 25,635 square metres GIA. The gross new office floorspace would be 7,790 square metres GIA. Under the terms of Policy P30, 10% of new office floorspace within the proposed development should be dedicated as ‘affordable workspace’. Set out below is a schedule of the applicant’s proposed affordable workspace offer:

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

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

113. As the above table shows, the proposed quantum of affordable workspace meets the spatial requirements of Policy P30. To ensure flexibility and to appeal to a wide range of prospective tenants, the units have been provided in a variety of sizes and at different levels of the development.
114. The Section 106 Agreement will include a dedicated 'affordable workspace' schedule. This will ensure, among other things, that:
- the workspace is provided for a 30-year period at a peppercorn rent for months 0-11, and then from 12 months until the end of the affordable workspace lifetime at no more than 75% Local Open Market Rent for equivalent space;
 - no more than 50% of the market rate office floorspace can be occupied until the affordable workspace has been fitted-out to the agreed specification ready for occupation;
 - a Full Management Plan and a Full Marketing Strategy, both to be secured in advance of the marketing period and first operation of the workspace;
 - the service charges payable by the tenant will be capped; and
 - the rates payable by the tenant will be capped.



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

to the units is shown by the red arrow.

Retail

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



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

Conclusion on principle of development

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

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

Policy background

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

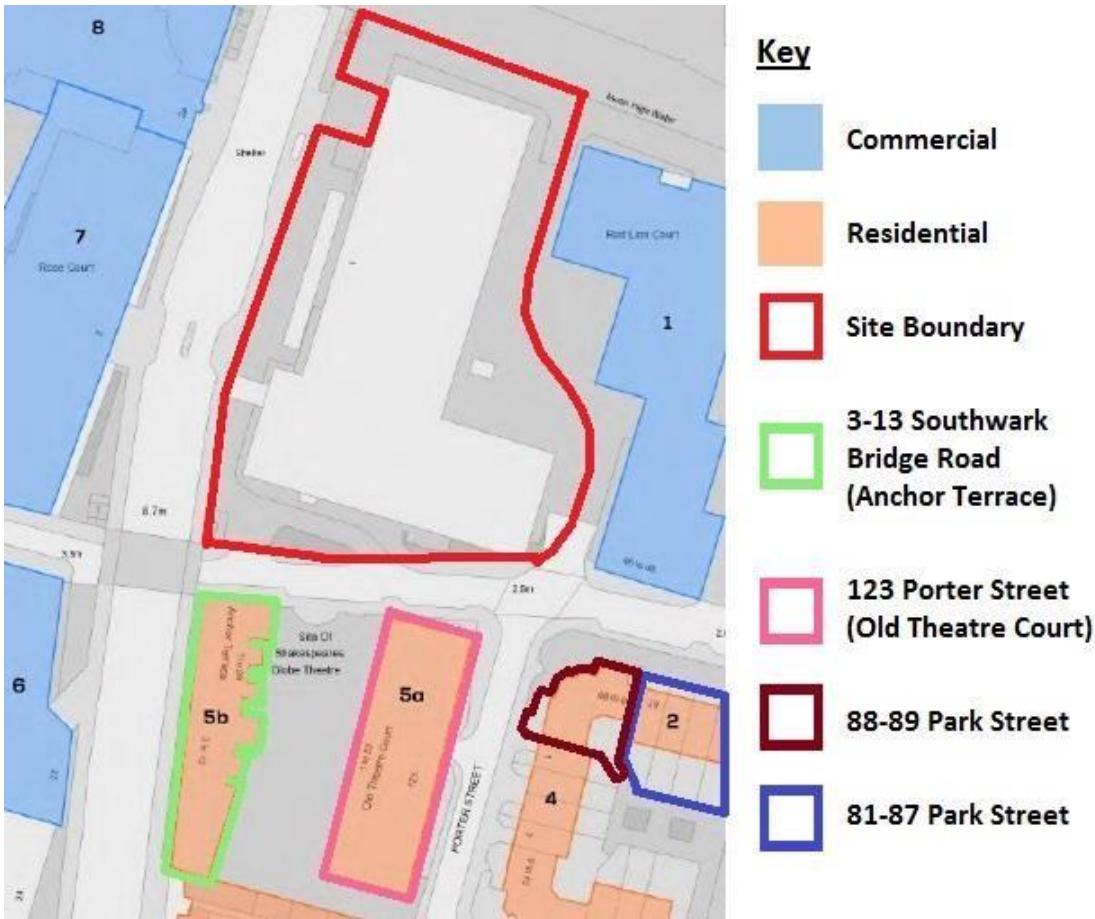


Figure 13: Site location plan with the surrounding sensitive residential buildings clustered into four groups, each edged in a different colour. The application site is shown edged in red.

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

Privacy

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

Assessment

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

Conclusion on privacy impacts

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

Outlook and sense of enclosure

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

Conclusion on outlook and sense of openness impacts

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

Noise

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

Environmental Protection Team has reviewed the Noise Impact Assessment.

Plant noise

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

Public noise nuisance

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

Roof terraces

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

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

Conclusion on noise

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

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

Odour

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

Daylight, sunlight and overshadowing impacts on nearby residential occupiers

Daylight

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

Properties assessed for daylight impacts

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

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

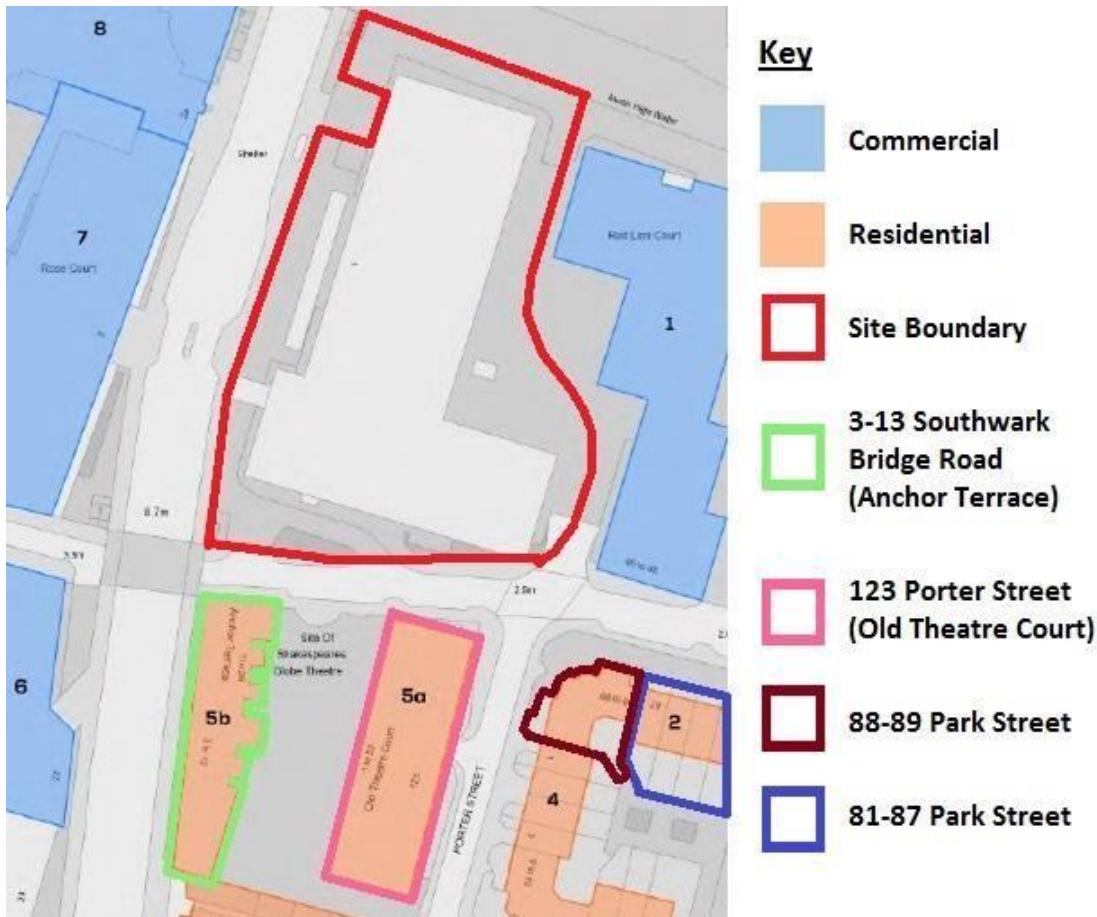


Figure 14: Site location plan with the surrounding sensitive residential buildings clustered into four groups, each edged in a different colour. The application site is shown edged in red.

Summary of VSC impacts for sensitive surrounding residential properties

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

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

Summary of NSL impacts for sensitive surrounding residential properties

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

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

Impact on 81-87 Park Street

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

Impact on 88-89 Park Street

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

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

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

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

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

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

Conclusion on daylight

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

Sunlight

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

Overshadowing

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

Design

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

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

159. The relevant borough-level design and conservation policies are Strategic Policy 12 of the Core Strategy 2011 and Saved Policies 3.12, 3.13, 3.18 and 3.20 of the Southwark Plan 2007. These policies require the highest possible standards of design for buildings and public spaces. The principles of good urban design must be taken into account in all developments including height, scale and massing, consideration of local context including historic environment, its character, and strategic and local townscape views.

Context and assessment of existing building's value

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

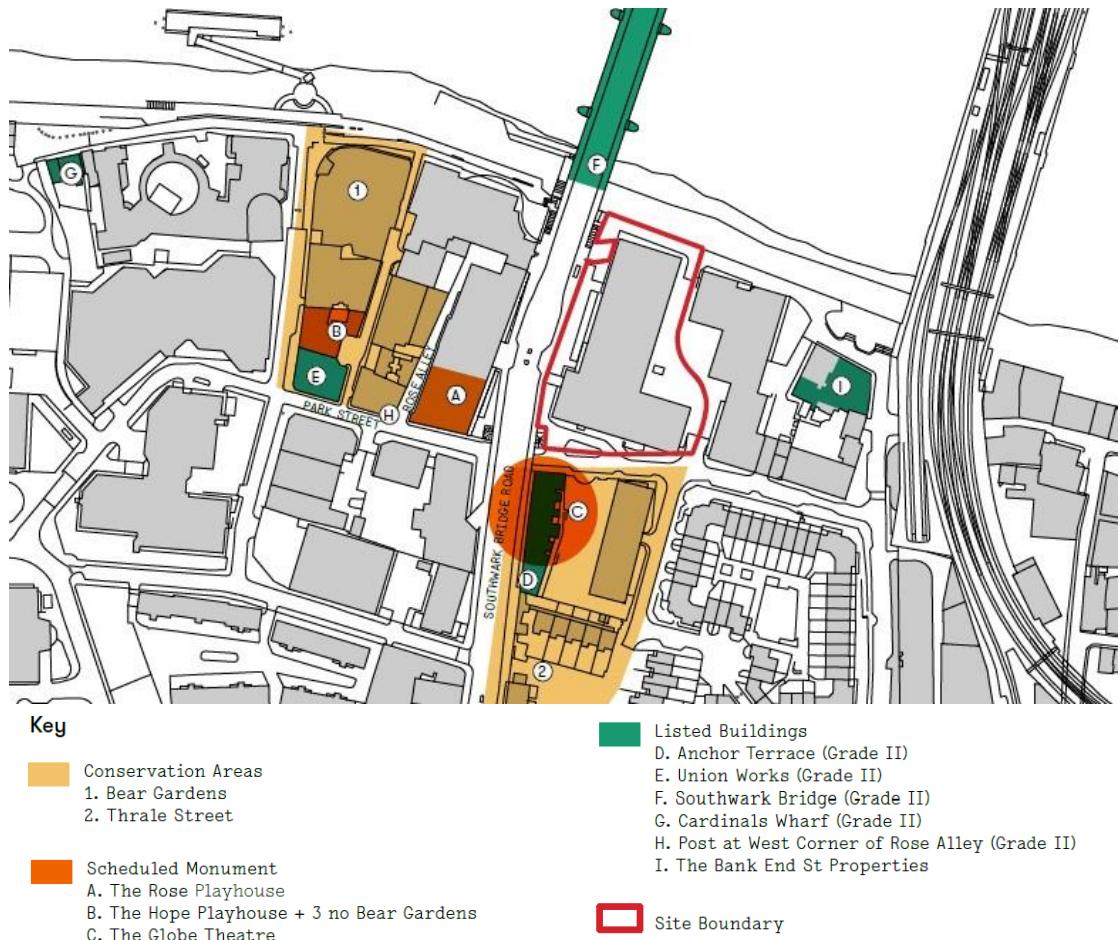


Figure 15 (above): Site location plan with nearby heritage assets highlighted.

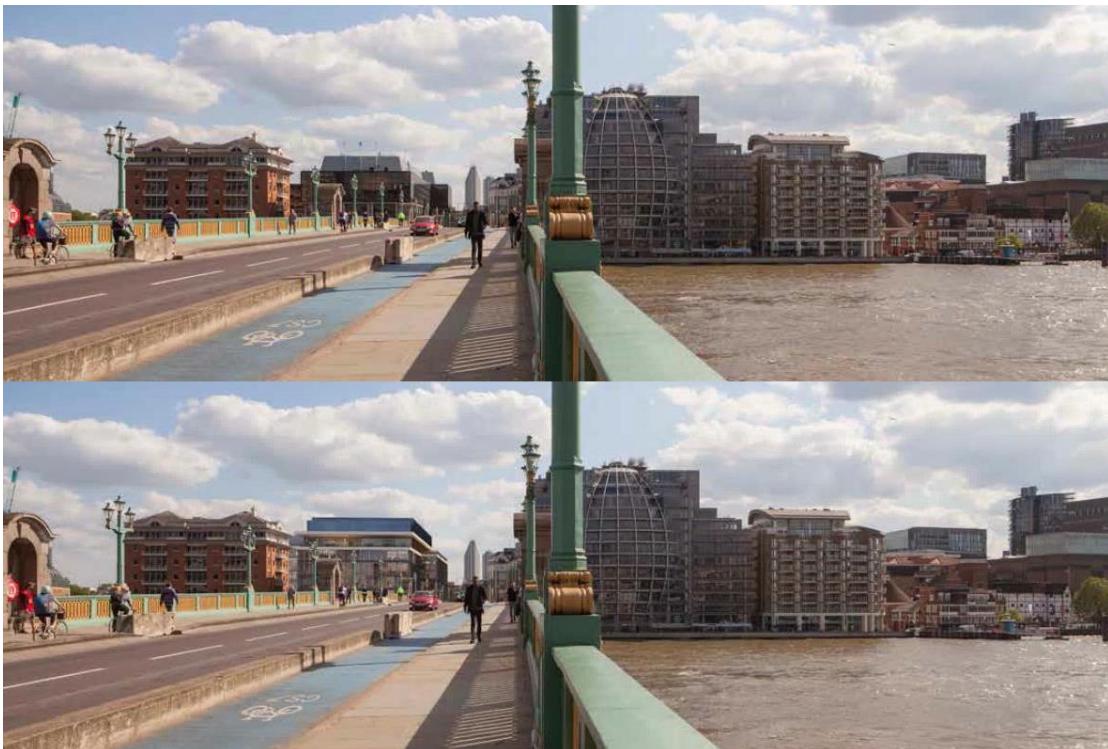
161. The existing building is noted for its muscular, 1980s architecture comprising heavy U-shaped columns that form an exoskeleton, containing a large dark glazed volume and supporting a dark glazed volume above, but more notable for the distinctive, illuminated FT logos at high level.
162. While being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

Height, scale and massing

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

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

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



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

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

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

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



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



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

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

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

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

Architectural treatment

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



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

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



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

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

Tall buildings

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

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

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

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

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

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

Landscape contribution

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

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

Point of landmark significance

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

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

Highest architectural standard

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

Relates well to its surroundings

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

Positive contribution to the London skyline

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

Free-to-enter publicly-accessible areas

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

Conclusion on tall building considerations

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

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

Heritage implications

185. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and its setting and to pay "special regard to the desirability of preserving or enhancing the character or appearance of that area". Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to have "special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". The NPPF provides guidance on how these tests are applied, referring in paragraphs 199-202 to the need to:

- give great weight to the conservation of the heritage asset (and the more important the asset, the greater the weight);
- evaluate the extent of harm or loss of its significance;
- generally refuse consent where the harm is substantial; and
- where necessary, weigh the harm against the public benefits of the scheme.

186. Paragraph 203 goes on to advise taking into account the effect of a scheme on the significance of a non-designated heritage asset.

187. The planning application includes a Townscape and Visual Impact Assessment that provides verified images of the development when viewed from 16 locations in and around the Bankside area, and when viewed within the relevant protected London panoramas. The submission demonstrates that at the proposed height the development will not be visible in the protected panoramic views from Alexandra Palace (LVMF 1A, TVIA view 1) or from Kenwood (LVMF 3A, TVIA view 2), being entirely screened from view by interposing buildings. Regarding other long distance views, whilst the building will be partially visible in the borough's protected vistas from One Tree Hill (BV1, TVIA view 4) and Nunhead Cemetery (BV2, TVIA view 5), it will nonetheless be read as similar in scale to its context and neither especially eye-catching nor so tall as to encroach upon St Paul's including the west towers.

188. Closer-by, regarding the river prospects from London Bridge (LVMF 11A, TVIA view 9), Southwark Bridge (LVMF 12A2, TVIA view 9) and the Millennium Bridge (LVMF 13, TVIA view 10), the proposals would have a neutral effect on the townscape in these views. The building would be seen very much within the context of similar scaled buildings, maintaining the

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



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

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

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

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

Design Review Panel

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

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

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

Inclusive access

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

Designing-out crime

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

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

Conclusion on design

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

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

Public realm, landscaping, trees and urban greening

Public realm and landscaping

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



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

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

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

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

Trees

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

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

Green infrastructure, ecology and biodiversity

Urban greening

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

Ecology and biodiversity

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

Transport and highways

Trip generation

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

Car parking

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

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

Cycle parking

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

Improving access to cycle hire options

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

Improvements to local footway and highway environment

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

Legible London signage

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

Servicing and deliveries

Servicing/delivery facilities and vehicle routing

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

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

Servicing/delivery hours

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

Servicing/delivery trips

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

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

Refuse storage arrangements and waste minimisation

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

Environmental matters

Construction management

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

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

Fire safety

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

third party suitably qualified assessor.

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

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

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

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

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

Flood risk, resilience and safety

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

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

Sustainable urban drainage

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

Land contamination

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

Air quality

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

Light pollution

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

Archaeology

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

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

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

Energy and sustainability

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

Energy and carbon emission reduction

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

Be Lean

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

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

275. The active measures include:

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

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

Be Clean

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

Be Green

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

- air source heat pumps for heating, cooling and water;
 - rooftop mounted 51 kWp photovoltaic array for electricity generation, with roof coverage optimised, generating a predicted annual yield of 40,131 kWh/yr.
279. With carbon emissions being reduced by 20% through these ‘Be Green’ measures, the applicant has demonstrated that opportunities for renewable energy by producing, storing and using renewable energy on-site have been maximised.
- Be Seen
280. Introduced as part of the London Plan 2021, ‘Be Seen’ is the newest addition to the GLA’s energy hierarchy. It requires developments to predict, monitor, verify and improve their energy performance during actual operation.
281. In respect of ‘Be Seen’ measures, the applicant has committed to:
- conducting a predicted operational energy use analysis (TM54 modelling) during the design stage and then measuring actual operational energy use once the development is in use, benchmarked against the in-design analysis;
 - using full metered electricity and water supplies; and
 - using sub-meters to measure electricity, heating and cooling energy use (linked to the building owner’s Building Energy Management System), which would feedback energy consumption to each user group/functional space/tenancy within the development.
282. This is an acceptable set of monitoring measures, enabling occupational carbon emissions to be minimised and helping engender energy consumption awareness and good practices among the building users.
283. A Planning Stage Whole Life Cycle Assessment, containing detailed unregulated carbon emissions calculations, should be conducted as part of the compliance with the ‘Be Seen’ policies and guidance. This matter is discussed in the following ‘Whole life cycle and carbon capture’ section of this report.

Total energy savings

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

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

Whole life cycle and carbon capture

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

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

Circular Economy

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

Start and end of building life

294. To explain how the materials, components and products to be used in the construction of the development will not only be sourced, but also disassembled and disposed of at the end of their useful life, the applicant has provided the following suite of documents:

- a Pre-Demolition / Refurbishment Audit;
- a Bill of Materials, which describes the materials to be used in the construction of the development and their provenance, including a commitment for recycled content to comprise at least 20% of the total;
- Transport Carbon Intensity Calculations, which breaks down the transport-related emissions generated by each sub-element of the building structure;
- a Materials and Products Life Cycle Assessment;
- a Building End-of-Life Strategy, which includes proposals for the long-term storage of the BIM model along with material specification and manufacturer's data sheets;
- a Recycling and Waste Reporting table, including an acknowledgement of the Mayor's policy targets of recycling and reusing 95% of construction, excavation and demolition waste.

Mid-life building adaption

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

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

In-Use Waste and Recycling Management

296. The applicant's Sustainability Strategy (page 33) and Delivery and Servicing Plan (page 11) together explain how recycling and re-use will be maximised, and waste production minimised, in the day-to-day operation of the development. Commitments include:
- provision of separate waste storage facilities for general waste recyclables and food/compostable waste;
 - a dedicated facilities manager/team will ensure waste is stored appropriately and transferred in good time prior to collection;
 - staff being made aware of the waste and recycling regime for the office;
 - keeping waste in the appropriate storage locations at all times, and transferring it to the kerbside only at collection times.
297. Operational waste and recycling estimates were not available at the time the Circular Economy Statement was produced, but the development will target BREEAM credit Wst 03 'Operational Waste', which is sufficient.

Summary

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

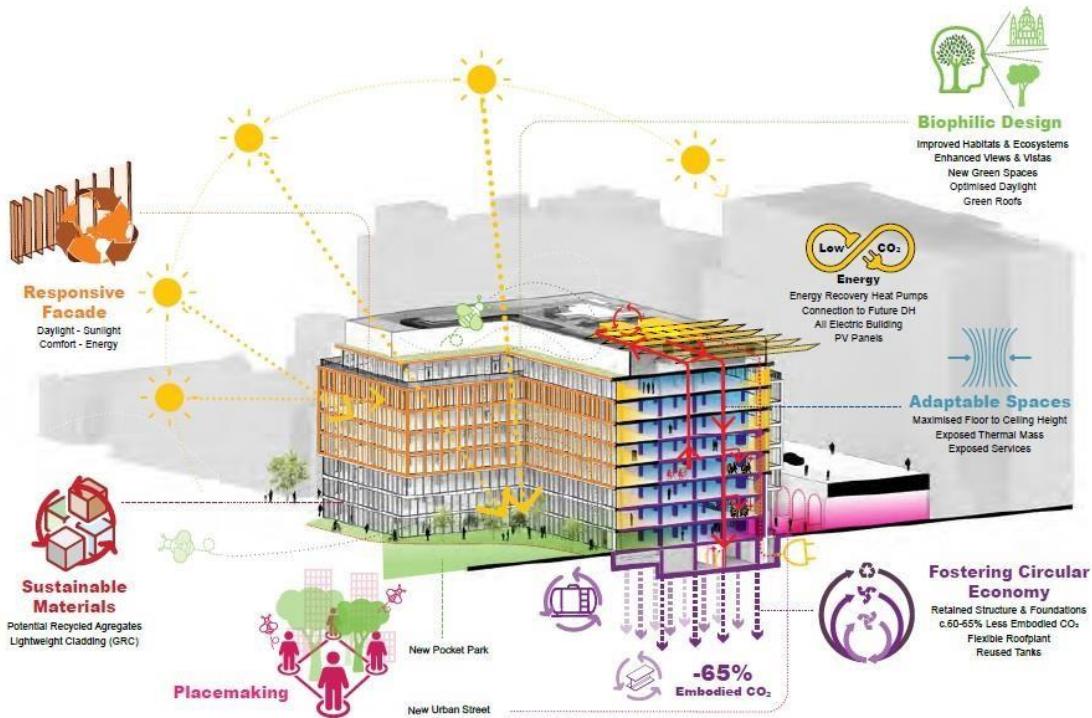


Figure 20 (above): Diagram depicting the key elements of the energy and sustainability strategy.

Overheating

299. London Plan Policy SI4 and Policy P68 of the emerging NSP set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The six-step hierarchy is as follows:
 - minimise internal heat generation through energy efficient design; then
 - reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
 - manage the heat within the building through exposed internal thermal mass and high ceilings; then
 - use passive ventilation; then
 - use mechanical ventilation; then
 - use active cooling systems (ensuring they are the lowest carbon options).

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

Minimise internal heat generation through energy efficient design

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

Reduce heat entering the building

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

Manage the heat within the building

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

Use passive ventilation

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

Use mechanical ventilation

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

Use active cooling systems (low carbon)

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

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

Summary

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

BREEAM

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

Water efficiency

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

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

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

Digital connectivity infrastructure

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

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

Socio-economic impacts

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

Planning obligations

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

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

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

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

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

	<ul style="list-style-type: none"> - charities, voluntary and community organisations or social enterprises; - creative and artists' workspace; - rehearsal and performance space and makerspace; - occupiers for disadvantaged groups starting up in any sector; - occupiers in support of educational outcomes through connections to schools, colleges or higher education; - existing businesses in Southwark who need to relocate; - small businesses located in Southwark; and - start-ups or small businesses otherwise identified by the workspace provider to be agreed with the council. <p>The Affordable Workspace Provider will retain discretion over the selection of the eligible tenants that take leases within the affordable workspace areas.</p>						
	Applicant's Position: AGREED						
KEY TERMS OF LEASE	<table border="1"> <tr> <td>Rent Review</td><td>Five yearly upward only, RPI linked.</td></tr> <tr> <td>Service charges</td><td>Cap in negotiation</td></tr> <tr> <td>Break clause</td><td> <p>For both the landlord and the tenant, a 3 year break on a minimum 5 year lease.</p> <p>Landlord and tenant break clause in the event that AW tenants are required to move into the arches.</p> </td></tr> </table>	Rent Review	Five yearly upward only, RPI linked.	Service charges	Cap in negotiation	Break clause	<p>For both the landlord and the tenant, a 3 year break on a minimum 5 year lease.</p> <p>Landlord and tenant break clause in the event that AW tenants are required to move into the arches.</p>
Rent Review	Five yearly upward only, RPI linked.						
Service charges	Cap in negotiation						
Break clause	<p>For both the landlord and the tenant, a 3 year break on a minimum 5 year lease.</p> <p>Landlord and tenant break clause in the event that AW tenants are required to move into the arches.</p>						
	Applicant's Position: Agreed on rent review and break clause; service charges cap still innegotiation						
MINIMUM SPECIFICATION OF UNIT(S)	<p>Prior to occupancy, each affordable workspace unit is to be provided to the Council's minimum specification. It prescribes the standards of:</p> <ul style="list-style-type: none"> - Fit-out (floor, ceiling, windows, doors, power, lighting etc.) specification at point of occupancy - Telecommunications 						

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

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

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

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

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

	<p>Applicant's Position: Agreed to the Joint Design & Management Framework; agreed in principle to the final requirement relating to maintaining/managing the pocket park and allowing public access, subject to the covenant expiring or terminating upon the end of the Applicant's lease on the building</p>
HOURS OF ACCESS	<p>The publicly-accessible pocket park shall be open between 08:00hrs and 20:00hrs every day of the week including Bank Holidays.</p> <p>All other areas of publicly-accessible realm within the application site shall be open 24 hours a day every day of the week including Bank Holidays.</p>
	<p>Applicant's Position: AGREED</p>
RIGHTS OF CLOSURE	<p>The developer shall be entitled to close the publicly-accessible realm (with prior notification to members of the public) for up to one day per year so as to prevent public rights of way being obtained.</p> <p>The developer shall be entitled to close all parts of the pocket park for up to 6 events per year (and of those no more than 2 days shall be in any calendar month).</p>
<p>Applicant's Position: AGREED</p>	
<h3>Energy and Sustainability</h3>	
FUTUREPROOFED CONNECTION TO DISTRICT CHP	<p>Prior to occupation, a CHP Energy Strategy must be approved setting out how the development will be designed and built so that all parts of it will be capable of connecting to any future District CHP.</p>
	<p>Applicant's Position: AGREED</p>
CARBON OFFSET	<p>£498,750 in-lieu payment for a total shortfall of 175 tonnes/CO₂ (calculated at a rate of £95/tonne for 30 years).</p> <p>Development as built is to achieve the carbon reduction, as set out in the submitted Energy Statement.</p>

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

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

"The proposal, by failing to provide for appropriate planning obligations secured through the completion of a Section 106 Agreement, fails to ensure adequate provision of mitigation against the adverse impacts of the development through projects or contributions in accordance with: Policy DF1 (Delivery of the Plan and Planning Obligations) of the London Plan 2021; Strategic Policy 14 (Delivery and implementation) of the Core Strategy 2011; Saved Policy 2.5 (Planning Obligations) of the Southwark Plan2007, and; Southwark Council's Planning Obligations and Community Infrastructure Levy SPD 2015."

Mayoral and Borough Community Infrastructure Levies

320. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the

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

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

Development description

322. The proposed development was originally:

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

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

Community involvement and engagement

325. This application was accompanied by a Statement of Community Involvement. The documents confirm that the following public consultation exercises were undertaken by the applicant prior to submission of the application:
- 05/10/20 – Email invitation to meet the local ward councillors;
 - 28/10/20 – Digital meeting with Cllr Adele Morris;
 - 29/10/20 – Letters advertising the webinar for Anchor Terrace residents distributed by hand;
 - 02/11/20 – Delivery of 781 flyers to neighbouring properties notifying them of the online consultation;
 - 05/11/20 – Email invitation with details of the online consultation to the local ward councillors;
 - 06/11/20 - Digital meeting with Cllr Johnson Situ;
 - 19/11/20 – Digital meeting with Living Bankside;
 - 23/11/20 – Digital meeting with the Anchor Terrace Freeholder Ltd;
 - 01/12/20 – Digital meeting with Better Bankside; and
 - 11/12/20 – Consultation with Southwark Regeneration Team
326. In addition, a website was created and has been live since November 2020 featuring information about the scheme, and has elicited 54 online survey responses. The applicant also made efforts to engage with local community groups such as Living Bankside and Better Bankside, as well as nearby residents and businesses.
327. Issues and requests raised as result of the public consultation included:
- the rooftop terraces could cause overlooking;
 - noise and other disruption may arise unless servicing and deliveries take place within 'working hours only';
 - the duration of the build, and the attendant amenity impacts on local residents, is a concern;
 - aspects of the design are not well-resolved and the building is at risk of not ageing well;
 - offices may not be in demand due to the impact of COVID;
 - homes might be a better use to provide on this site;
 - the developer should fund highways improvements, especially on Southwark Bridge Road; and
 - the proposal should aim to improve public access and permeability.
328. As part of its statutory requirements, the Council sent letters to surrounding residents, issued a press notice publicising the planning application and displayed notices in the vicinity of the site. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to

participate in the planning process.

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

Consultation responses from internal and divisional consultees

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

331. Archaeologist:

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

332. Ecology Team:

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

333. Environmental Protection Team:

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

334. Flood Risk Management Team:

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

335. Highways Construction Management Plans Team:

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

336. Highways Development Management and Highways Licensing Teams:

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

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

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

337. Local Economy Team:

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

338. Transport Policy Team:

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

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

- **Officer response:** Plans depicting the requested disabled car parking/vehicle manoeuvring space reorganisation have been submitted. These show the footway widened to the requested 2.4 metres, without causing either of the two spaces to intercept the vehicle tracking through the forecourt.

- The applicant should be required to deliver 500 cycle spaces, rather than the 405 spaces offered. 500 is requested because it is a midway point between the requirements of the New London Plan and requirements of the New Southwark Plan.
 - **Officer response:** The applicant has refused the request to deliver 95 additional spaces. At pre-application stage, the applicant was advised by officers that New London Plan compliance would suffice having regard to, firstly, the proposals being a refurbishment of an existing building and, secondly, the weight attributable to the emerging New Southwark Plan at that time. While the New Southwark Plan has since gained more weight, it is still an unadopted policy so does not carry full weight. Given that the cycle storage proposals presented in the planning application documents are compliant with the New London Plan, and that to deliver a further 95 would require an entirereconfiguration of the ground floor level of the building, it is not considered reasonable to require a higher number of spaces to be delivered. Instead an informative will be attached to the DraftDecision Notice encouraging the applicant to optimise cycle storage when preparing the finalised proposals for post-decision approval.
- Details of the lift access connecting this development from Southwark Bridge Road to the building, to assist its mobility-impaired staff/patrons, should be provided from the onset as this is very critical.
 - **Officer response:** Outline plans have been provided by the applicant. Full details, to include a temporary replacement facility when the lift is undergoing maintenance, will be secured by condition.
- A CEMP and a DSP must be submitted for approval by the Council. With respect to the CEMP specifically, this should comprise for each of the two phases of the build: a site layout plan showing delivery/parking areas and position of wheel washing facilities; the use of off-site consolidation centre; engaging only transport operators with at least 'Silver' membership of FORS; restricting deliveries to times outside school arrival/departure times of 1500hrs to 1600hrs in addition to avoiding morning/evening peak traffic hours; and penalties relating to

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

- **Officer response:** Conditions requiring these submissions have been included on the Draft Decision Notice.

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

339. Urban Forester:

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

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

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

Consultation responses from external consultees

340. City of London

- No comments.

341. Environment Agency:

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

342. GLA [Stage I response]:

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

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

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

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

343. London Fire Brigade:

- No comment received, no objection assumed.

344. Metropolitan Police:

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

345. Thames Water:

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

346. Transport for London:

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

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

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

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

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

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

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

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

- **Officer response:** The Air Quality Assessment will be listed on the Decision Notice as an approved plan, thereby requiring the implementation and operation of the development to comply with the measures set out within. Further, the recommended CEMP condition expressly requires compliance with up-to-date European and London low emission standards as well as the Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999; compliance with all of these will ensure construction-related emissions are controlled.

- The applicant should set out the public transport trips clearly by mode, direction of travel, line or route. The applicant should therefore break down the 'Rail' mode into National Rail and London Underground.
 - **Officer response:** Updated information has since been supplied to TfL, and deemed acceptable. LBS officers understand no concerns remain in this regard.
- The Council should ensure that the initiatives outlined with the Circular Economy Statement to reduce waste and encourage reuse are secured.
 - **Officer response:** Circular Economy conditions have been included on the Draft Decision Notice.
- A Travel Plan, a CEMP a, CLP and a DSP must be submitted for approval by the Council, the latter two in consultation with TfL (due to possible impacts on bus operations), prior to commencement.
 - **Officer response:** Conditions requiring these submissions have been included on the Draft Decision Notice. The conditions requiring submission of the CEMP and CLP have both been split into two parts: one for demolition/enabling stage and one for the construction stage.

347. Twentieth Century Society

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

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

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

348. UK Power Networks:

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

Community impact and equalities assessment

349. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act:

1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
2. The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it.

This involves having due regard to the need to:

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low

3. The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.
350. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
351. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
352. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

Human rights implications

353. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
354. This application has the legitimate aim of refurbishing, recladding and extending (in the form of additional storeys and infills) the existing officebuilding, providing additional office floorspace and a retail unit, supported by various ancillary facilities, new publicly-accessible realm and associated works. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive engagement: summary table	
Was the pre-application service used for this application?	YES

If the pre-application service was used for this application, was the advice given followed?	YES
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	YES

CONCLUSION

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

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

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

BACKGROUND DOCUMENTS

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

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Planning history
Appendix 4	Recommendation

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth		
Report Author	Patrick Cronin, Senior Planning Officer		
Version	Final		
Dated	24 August 2021		
Key Decision	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title	Comments Sought	Comments included	
Strategic Director of Finance & Governance	No	No	
Strategic Director, Environment and Social Regeneration	No	No	
Strategic Director of Housing and Modernisation	No	No	
Director of Regeneration	No	No	
Date final report sent to Constitutional Team	24 August 2021		