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Item No.	Classification:	Date:	Meeting Name:
7.1	OPEN	07.09.2021	Planning Committee
Report title:	Development Management planning application:		
	<p>Redevelopment of the site comprising demolition of the existing buildings and erection of a new part 22/part 15 storey building (with three levels of basement) comprising Office (Class E), Public House (Sui Generis), 66 flats (Class C3) and flexible Office/Community use (Class E/F2) together with public realm improvements and other associated works.</p> <p>Address: Land, Including Edward Edwards House And The Prince William Pub, Suthring House, At 216-220 Blackfriars Road (north Of Nicholson Street), SE1</p>		
Ward(s) or groups affected:	Borough and Bankside		
From:	Director of Planning and Growth		
Application Start Date	11.12.2020	PPA Expiry Date	28.01.2022
Earliest Decision Date	14.02.2021		

RECOMMENDATION

1. That planning permission be granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.
2. In the event that the requirements of paragraph 1 above are not met by 28 January 2022, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 364.

EXECUTIVE SUMMARY

3. This application seeks to redevelop existing buildings on land fronting Blackfriars Road, Nicholson Street and Chancel Street to provide offices, a public house and 62 almshouse dwellings. The building would range from 15 to 22 storeys in height. The applicant is Southwark Charities, who own and operate the existing Edward Edwards House almshouses, and also own the adjacent land to the immediate north, although this does not form part of the current application.

4. This northern part of Blackfriars Road is undergoing rapid change, with new buildings of significant height and increased densities, responding to the location within a highly accessible part of the Central Activities Zone. There is increased interest in building office and commercial schemes in this area, which is consistent with development plan policies reflecting the important role of the CAZ in London's economy.
5. The application would see the pub, the Prince William Henry, replaced with a new public house use with outdoor seating, a large scale office capable of providing around 2,270 jobs, 62 new almshouse flats (plus a caretakers flat and three small visitor units). The almshouses would all be defined as affordable housing and specifically designed for older people. They provide good quality accommodation, and benefit from communal and social spaces and landscaped terraces. This part of the wider development also provides a community space and affordable offices earmarked for charities.
6. The site forms part of a wider site allocation, NSP13, in the emerging New Southwark Plan. Whilst this application only covers the southern part of the wider allocation site, the uses proposed are consistent with the allocation, increasing the quantity of offices, providing an active frontage to Blackfriars Road, re-providing the almshouses, and providing new public realm and routes. It does not provide general needs housing (Class C3 use) (which is identified as a 'should' in the allocation), but given the uplift in almshouse units, and the potential for more homes if the northern area of the allocation came forward, this is acceptable.
7. The building is tall, standing 22 storeys high as it fronts Blackfriars Road and returns into Nicholson Street, and 15 storeys at the rear, fronting Chancel Street. Although on the periphery of the cluster of very tall buildings at the northern end of Blackfriars Road, it is noticeably taller than its immediate neighbours, and will be a prominent feature in views from the lower rise areas to the east. The building has been carefully designed, using high quality materials, and on balance it is concluded that the scale can be justified when taking due account of the high quality design, and contribution to public realm.
8. A new public and communal garden space is provided at the eastern end of the site, fronting Chancel Street. This would act as a welcome break in the street scene, and a suitable setting for the tall building. Additional public realm improvements are included to the route along the northern edge of the site, and on Blackfriars Road.
9. The report sets out the 'less than substantial' harm to nearby heritage assets, and balances this with the public benefits of the scheme. It also sets out the impact on amenity for neighbours, particularly those on the Rochester Estate to the south, which arises from the scale of the building, and concludes that whilst the harm is substantial in some cases, it is consistent with the need to apply the BRE tests flexibly in dense urban environments.
10. The building performs well in terms of its carbon impact, with 50% savings in carbon emissions achieved against Part L of the Building Regulations 2013. This is through building fabric efficiencies and reducing energy demand in line with London Plan 2021 policies, in addition to renewable energy generation through

PV panels and air source heat pumps. The remaining 50% balance to zero carbon would be met by an off-set payment of approximately £638,400 to be secured by S106 obligation. The non-residential elements of the proposal would achieve BREEAM 'Excellent,' in compliance with policy.

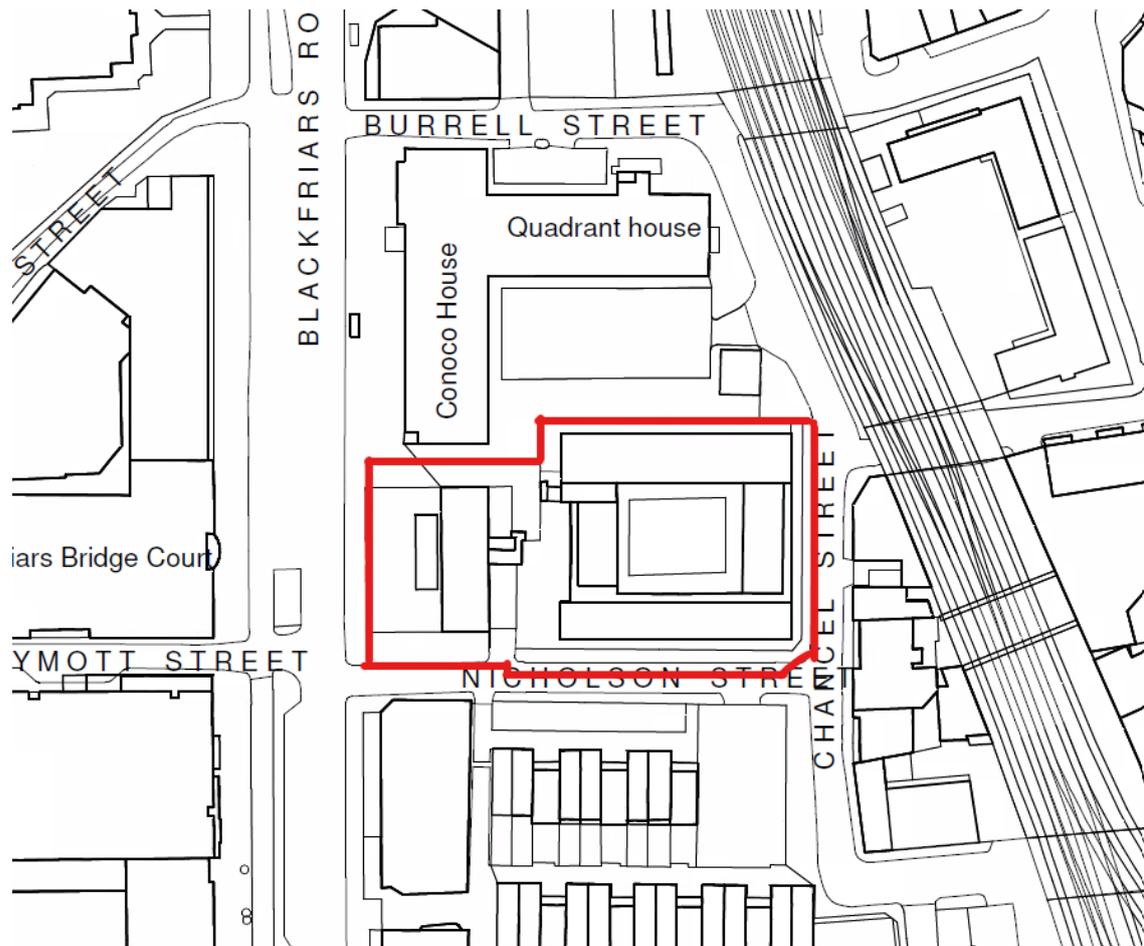
11. The transport impacts are not significant given the site's 'Excellent' PTAL rating, and servicing for all but larger vehicles would be contained within the site. Contributions would be secured through the s106 agreement for contributions to TfL's Santander cycle hire and Healthy Streets schemes, in addition to targets set and financial contributions secured against these for delivery and servicing arrangements and a travel plan to minimise trips and encourage active travel.
12. In response to the Council's statutory consultation, 3 objections and 69 comments in support were received from members of the public. The objections were from residents very close to the site, raising strong objections to the scale and resultant impact on amenity. The comments in support were from a much wider geographical area, generally noting the contribution to affordable housing for older people, and supporting the work of Southwark Charities, and most came from charities and organisations with interest in these issues. The GLA's Stage 1 report supported the application, including strong support for the provision of the affordable housing element for older people, subject to clarification and resolving issues regarding the impacts of the proposal as a tall on microclimate, energy and sustainability, and transport. This issues were subsequently resolved during the application determination period.
13. The application would create good quality affordable homes, modern offices, and an active and dynamic frontage to Blackfriars Road, within a building with a distinctive and attractive architecture. The scheme is compliant with adopted and emerging development plan policy, when read as a whole, and as such the report recommends that planning permission be granted.

BACKGROUND INFORMATION

Site location and description

14. The site comprises an approximately 0.34ha parcel of land located between Blackfriars Road to the west, neighbouring residential and commercial buildings and an associated car park to the north, Chancel Street to the east and Nicholson Street to the south.
15. The site currently contains two low-rise post-war buildings: Suthring House is a mixed use building with the Prince William Henry public house on the ground floor. It has a large area of external seating fronting Blackfriars Road. Six self-contained residential units are located in the upper two storeys of the building. The remainder of the site is largely taken up by the two storey Edward Edwards House. This is a perimeter block with an internal courtyard garden. The building hosts 25 almshouse flats, owned and managed by Southwark Charities.

Existing Site Plan



16. The buildings to the north of the site comprise Conoco House and Quadrant House. The former faces Blackfriars Road as a commercial building, the latter being located to the rear of this and comprising social rented housing owned by L&Q. Between the application site and these buildings is an hard landscaped public route that connects Blackfriars Road with Chancel Street onto Treveris Street to the east through a railway viaduct. Both are 9 storey buildings. To the east bounding Chancel St is the railway viaduct, along with some smaller-scale 4 storey Victorian and Georgian buildings to the south east. To the south is a low-rise council estate comprising rows of 2-3 storey houses and flats, with properties on Nicholson Street facing the application site.
17. The application site is under the same freehold ownership as the two buildings (Conoco House and Quadrant House) and car parking area to the north. Together these comprise a site allocation in the draft New Southwark Plan, NSP13.
18. The buildings on the site are not listed, nor is it located in a conservation area. No.s 43 and 44 Dolben Street are located to the south east in the immediate vicinity of the site and, adjacent to the Victorian buildings located on Chancel Street. These buildings are Grade II listed. The site is located in the setting of the Roupell Street and Waterloo Conservation Areas, located in LB Lambeth to the west.

19. The site is additionally within the vicinity of the Grade II listed Christchurch located approximately 85m to the north east on the opposite side of Blackfriars Road. The surrounding churchyard gardens are designated and protected as Borough Open Land (BOL). 1 – 3 Stamford Street, also Grade II listed, are located further to the north also within the setting of the site.
20. Blackfriars Road hosts a range of local transport infrastructure, including numerous bus stops, the nearest London Underground station at Southwark Station approximately 150m to the south, and dedicated segregated cycle routes as part of Cycle Superhighway 6. Nicholson Street hosts a portion of one of London’s cycle ‘Quietways.’

Existing building – Suthring House



Existing building – Edward Edwards House

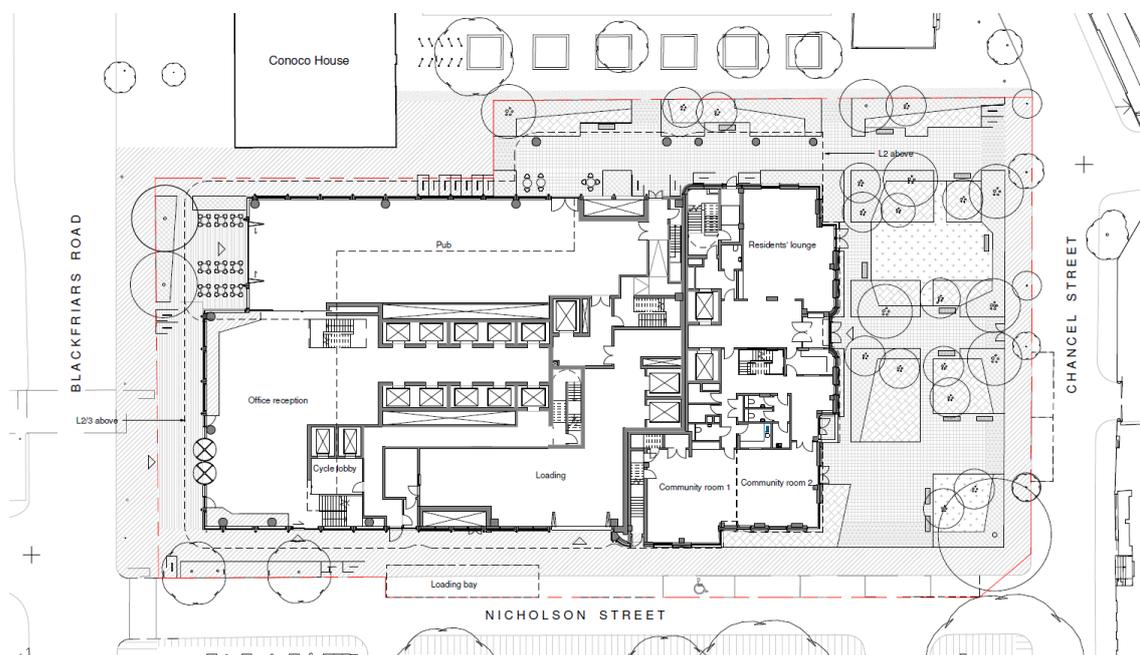


Details of proposal

21. Planning consent is sought for the redevelopment of the site to include demolition of the existing buildings and the erection of a part 22 and part 15 storey mixed use building with associated public realm. The single building would comprise two volumes: the largest and tallest primarily providing E class office floorspace, with a public house (formerly Class A4, now Sui Generis use) on the ground floor and within a mezzanine level.
22. The massing of the office block element would accommodate set backs and step downs in height across levels 16, 18 and 20. These step backs would accommodate accessible external roof terraces to provide amenity space for the office occupants.

Both the office and public house elements would have their primary access fronting onto Blackfriars Road, with the public house located in the northern-most corner of the site. Servicing access for both of these uses would be provided from Nicholson Street to the south. An on-site loading bay would be provided for smaller vehicles within the proposed building, while larger delivery vehicles would utilise a bay on Nicholson Street for loading and unloading. Basement level cycle parking and associated facilities (showers, changing rooms, lockers) would be provided for the office, also accessed from Nicholson Street.

Proposed Ground floor site plan

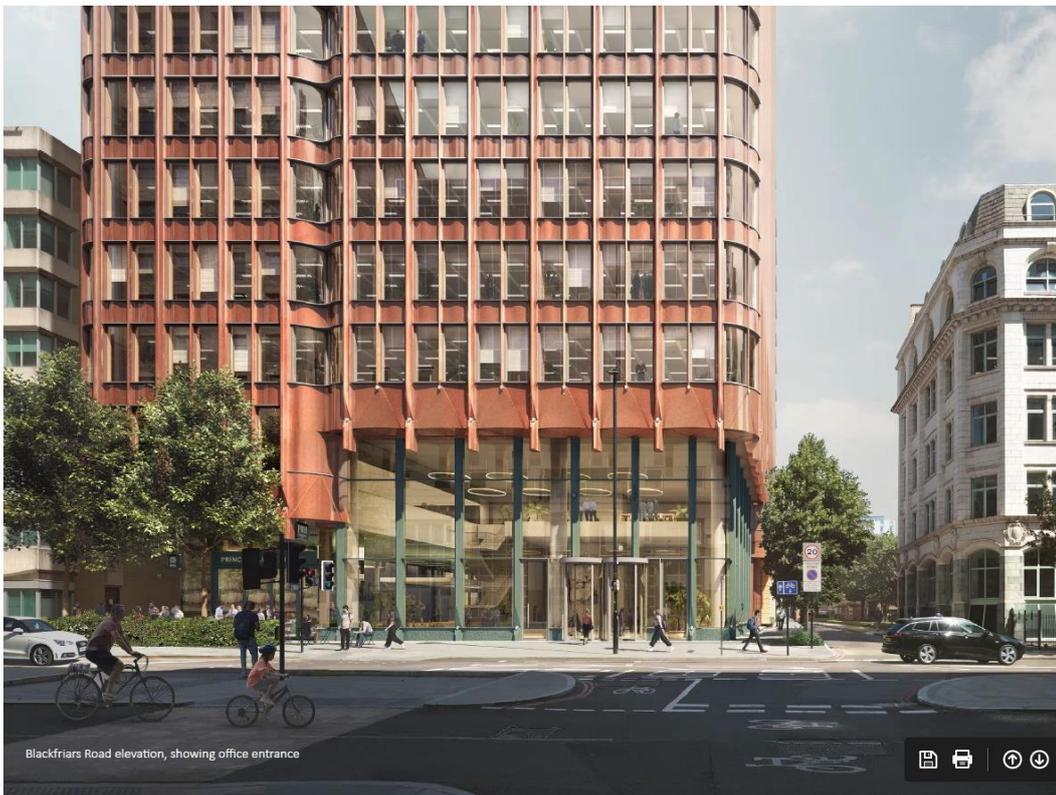


23. The public house would have areas of external seating both on the Blackfriars Road and off the retained east-west public route (to be called 'Edward's Walk') running between the site and Conoco House to the north. The public house frontage would double height, while the office frontage would be triple height with a large atrium, including mezzanine levels, behind.
24. The second volume of the proposed building comprises a 15 storey block fronting onto Chancel Street, to provide a community use and affordable workspace on

ground floor level and first floor levels, with 66 units of residential accommodation above. 62 one-bed flats would be to provide affordable housing (almshouses) for elderly occupants, to be managed by Southwark Charities. 3 of the units would provide guest suites for visitors, while the final unit would be a flat for an on-site care taker.

25. The almshouses accommodation block would be set back from the Chancel Street frontage to accommodate a new public space. This would be landscaped with a view to being accessible by both the public and as a communal garden for the almshouse residents. The residents would additionally have their own roof top amenity space at the top of the 15 storey the block.
26. The building would be faced primarily in terracotta tiles and glazing utilised in a variety of colours and arrangements to provide a distinctive pattern and character. The two primary elements of the development (the offices and the almshouses) would be distinguished by the change in elevation detail and colour: in the image below the larger Blackfriars Road office element has a red/orange colour scheme, while the residential almshouses block would be yellow.

Proposed Blackfriars Road offices



Planning History

Planning history of the site

27. The site was subject to a pre-application enquiry under references 19/EQ/0193. The main issues discussed related to layout, height, scale massing, land use and impact on views and heritage assets.

Planning history of adjoining or nearby sites.

28. A number of developments within the vicinity of the application site along Blackfriars Road have been granted planning permission in recent years:
29. Application reference no.: **09/AP/1749**
Application type: Full planning permission
For: Demolition of existing building and erection of a new 14 storey building (maximum 47.93m AOD) incorporating two hotels with a total of 477 bedrooms (Class C1 - total floorspace 16414sqm GIA) each with restaurant (Class A3 - total floorspace 142sqm GIA) and bar (Class A4 - total floorspace 92sqm GIA), landscaping, plant and machinery and ancillary works, including works to Blackfriars Road and Meymott Street.
Address: 46-49 Blackfriars Road London SE1 8NZ
Decision: Granted with legal agreement
Decision Issued Date: 09/11/2009
30. Application reference no.: **10/AP/3372**
Application type: Full planning permission
For: Erection of a 20 storey building with basement (maximum 89m AOD) to provide 29,198sqm of office floorspace and 455sqm of ground floor retail floorspace (Class A1/A2/A3/A4), with plant, rear servicing area and cycle parking.
231-241 Blackfriars Road London SE1 8NW
Decision: Granted with legal agreement
Decision Issued Date: 15/06/2011
31. Application reference no.: **15/AP/0237**
Application type: Full planning permission
For: Redevelopment of land and buildings to provide a part 7, part 12, part 14 storey building plus basement, ground and mezzanine levels, comprising office (Class B1) and hotel (Class C1) with ancillary cafe/bar/restaurant and other associated supporting facilities, ancillary plant, servicing, and cycle parking and associated highway and public realm improvements.
Wedge House 32-40 Blackfriars Road London SE1 8PB
Decision: Granted with legal agreement
Decision Issued Date: 26/08/2015
32. Application reference no.: **16/AP/1660**
Application type: Full planning permission
For: Demolition of existing office building (Class B1a) and redevelopment to provide a part 13, part 22 storey building plus basement comprising offices (Class B1a) with retail (Classes A1/A3 and A4) together with servicing, car parking and landscaping.
41-45 Friars Bridge Court Blackfriars Road London Southwark SE1 8NZ
Decision: Granted with legal agreement
Decision Issued Date: 11/11/2016 (note: planning permission has lapsed)
33. Application reference no.: **16/AP/5239**
Application type: Full planning permission
For: Redevelopment of site to create four levels of basement and the erection of six buildings ranging from five to 53 storeys plus plant (heights ranging from

23.1m AOD - 183.5m AOD) to provide; office space (Class B1); 548 room hotel (Class C1); 288 residential units (Class C3); flexible retail uses (Classes A1/A2/A3/A4); restaurant (Class A3); music venue (Class D2); storage (Class B8); new landscaping and public realm; reconfigured vehicular and pedestrian access; associated works to public highway; ancillary servicing and plant; car parking and associated works.

Land At 18 Blackfriars Road Bounded By Stamford Street Paris Garden And Christ Church Gardens London SE1 8NY

Decision: Granted with legal agreement

Decision Issued Date: 21/06/2018

34. Application reference no.: **20/AP/1189**
Application type: Full planning permission
Redevelopment of the site including the demolition of Nos. 49-56 Hatfields and No 1 Joan Street to provide an 17 storey (plus plant) building above Southwark Underground Station accommodating Class B1 office space and Class A1/A2/A3/A4 retail space. The development includes associated basement construction, public realm improvements and associated highways works including the closure of Joan Street.
Southwark Underground Station The Cut, 68-70 Blackfriars Road London Southwark
Status: Resolution to grant planning permission agreed 17/03/2021, subject to completion of S106 agreement
35. Application reference no.: **21/AP/0737**
Application type: Full planning permission
Demolition of existing buildings to allow for the erection of a new building up to eight storeys in height (plus roof plant and basement) to provide Class E accommodation including office and retail floorspace. The development will include improvements to the low line and public realm, cycle parking, provision of a service bay and other associated works.
33-36 Bear Lane London Southwark SE1 0UH
Status: Under consideration/assessment

KEY ISSUES FOR CONSIDERATION

Summary of main issues

36. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use;
 - Housing issues, including affordable housing, housing mix and quality of residential accommodation
 - Design issues, including layout, building heights, architectural treatment and landscaping
 - Heritage considerations
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area, including privacy, daylight and sunlight
 - Transport and highways, including servicing, car parking and cycle parking
 - Archaeology

- Environmental matters, including construction management, flooding, air quality and microclimate
- Energy and sustainability, including carbon emission reduction
- Planning obligations (S.106 undertaking or agreement)
- Mayoral and borough community infrastructure levy (CIL)
- Consultation responses and community engagement
- Community impact, equalities assessment and human rights

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

Legal context

38. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2016, the Core Strategy 2011, and the Saved Southwark Plan 2007. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.
39. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Planning policy

40. The statutory development plans for the Borough comprise the London Plan 2021, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007). The National Planning Policy Framework (2021) and emerging policies constitute material considerations but are not part of the statutory development plan. A list of policies which are relevant to this application is provided below. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.
41. The site is located within:
- The Central Activities Zone (CAZ)
 - The Bankside, Borough and London Bridge Opportunity Area (referred to in the London Plan 2021 as the London Bridge and Bankside Opportunity Area)
 - The Bankside and Borough District Town Centre
 - The Bankside, Borough and London Bridge Strategic Cultural Area
 - The Air Quality Management Area
42. The site has a Public Transport Accessibility Level (PTAL) of 6b where 1 is the lowest level and 6b the highest, indicating excellent access to public transport.

43. The site is located within Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding however it benefits from protection by the Thames Barrier.
44. The following listed buildings are either adjacent to or near the site:
- Christchurch
 - 1 – 3 Stamford Street
 - 43 – 44 Dolben Street
45. The site itself is not located within a conservation area however it is visible from and within the setting of the Roupell Street and Waterloo Conservation Areas, located in LB Lambeth to the west. The site is located within several ‘River Prospect’ views identified by the Mayor of London in the London View Management Framework. This includes views facing the south bank of the Thames from Millennium Bridge and the Hungerford Bridge. The site is not located within an adopted Archaeological Priority Zone (APZ), although is located within the draft ‘North Southwark and Roman Roads’ APZ proposed for adoption within the draft New Southwark Plan.

National Planning Policy Framework (NPPF)

46. The revised National Planning Policy Framework (‘NPPF’) was published in July 2021 which sets out the national planning policy. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. Paragraph 2 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

Chapter 2 Achieving sustainable development

Chapter 5 Delivering a sufficient supply of homes

Chapter 6 Building a strong, competitive economy

Chapter 7 Ensuring the vitality of town centres

Chapter 8 Promoting healthy and safe communities

Chapter 9 Promoting sustainable transport

Chapter 11 Making effective use of land

Chapter 12 Achieving well-designed places

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

Chapter 15 Conserving and enhancing the natural environment

Chapter 16 Conserving and enhancing the historic environment

The London Plan 2021

47. 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.
48. 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.

GG1: Building strong and inclusive communities
GG2: Making the best use of land
GG3: Creating a healthy city
GG4: Delivering the homes Londoners need
GG5: Growing a good economy
GG6: Increasing efficiency and resilience
SD1: Opportunity Areas
SD4: The Central Activities Zone
SD5: Offices, other strategic functions and residential development in the CAZ
SD6: Town centres and high streets
SD7: Town centres development principles and Development Plan Documents
D1: London's form, character and capacity for growth
D2: Infrastructure requirements for sustainable densities
D3: Optimising site capacity through the design-led approach
D4: Delivering good design
D5: Inclusive design
D6: Housing quality and standards
D7: Accessible Housing
D8: Public realm
D9: Tall buildings
D10: Basement development
D11: Safety, security and resilience to emergency
D12: Fire safety
D14: Agent of Change
H1 Increasing housing supply
H4 Delivering affordable housing
H5 Threshold approach to applications
H6 Affordable housing tenure
H7 Monitoring of affordable housing
H8 Loss of existing housing and estate redevelopment
H9 Ensuring the best use of stock
H10 Housing size mix
H13 Specialist older persons housing
S1: Developing London's social infrastructure
E1: Offices
E2: Providing suitable business space
E3: Affordable workspace
E11: Skills and opportunities for all
HC1 Heritage conservation and growth
HC3 Strategic and Local Views
HC4 London View Management Framework
HC5 Supporting London's culture and creative industries
HC6 Supporting the night-time economy
HC7 Protecting public houses
G1: Green infrastructure
G4: Open space
G5: Urban greening
G6: Biodiversity and access to nature

G7: Trees and woodlands
SI1: Improving air quality
SI2: Minimising greenhouse gas emissions
SI4: Managing heat risk
SI5: Water infrastructure
SI7: Reducing waste and supporting the circular economy
SI12: Flood risk management
SI13: Sustainable drainage
T1: Strategic approach to transport
T2: Healthy streets
T3: Transport capacity, connectivity and safeguarding
T4: Assessing and mitigating transport impacts
T5: Cycling
T6: Car parking
T7: Deliveries, servicing and construction
T9: Funding transport infrastructure through planning
DF1: Delivery of the Plan and Planning Obligations.

Greater London Authority Supplementary Guidance (SPG)

49. The relevant London-level supplementary planning documents and guidance documents are as follows:

Character and Context (2014)
The Control of Dust and Emissions During Construction and Demolition (2014)
Energy Planning Guidance (2020)
London View Management Framework (2012)
Use of Planning Obligations in the Funding of Crossrail and the Community Infrastructure Levy (2013)
Crossrail Funding SPG 2016)
Housing SPG (2016)

50. The following draft SPGs and guidance documents were consulted during the determination process of the application:

51. Circular Economy Statements – consultation draft (October 2020)
Whole-life Carbon Assessments – consultation draft (October 2020)
'Be Seen' Energy Monitoring Guidance – consultation draft (October 2020)
Fire Safety (2021 pre-consultation draft)
Urban Greening Factor (2021 pre-consultation draft)

The Core Strategy 2011

52. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are:

Strategic Targets Policy 1 – Achieving growth
Strategic Targets Policy 2 - Improving places
Strategic Policy 1 - Sustainable development
Strategic Policy 2 - Sustainable transport

Strategic Policy 3 - Shopping, leisure and entertainment
Strategic Policy 6 – Homes for people on different incomes
Strategic Policy 10 - Jobs and businesses
Strategic Policy 12 - Design and conservation
Strategic Policy 13 - High environmental standards

The Southwark Plan 2007 (Saved policies)

53. In 2013, the Secretary of State issued a saving direction in respect of certain policies. These saved policies continue to form part of the statutory development plan. Paragraph 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 policies of the Southwark Plan 2007 are:

Policy 1.1 Access to Employment Opportunities
Policy 1.4 Employment Sites
Policy 1.7 Development within Town and Local Centres
Policy 2.2 New Community Facilities
Policy 2.5 Planning Obligations
Policy 3.1 Environmental Effects
Policy 3.2 Protection of Amenity
Policy 3.3 Sustainability Assessment
Policy 3.4 Energy Efficiency
Policy 3.6 Air Quality
Policy 3.7 Waste Reduction
Policy 3.8 Waste Reduction
Policy 3.9 Water
Policy 3.11 Efficient Use of Land
Policy 3.12 Quality in Design
Policy 3.13 Urban Design
Policy 3.14 Designing Out Crime
Policy 3.15 Conservation of the Historic Environment
Policy 3.16 Conservation Areas
Policy 3.18 Setting of Listed Buildings, Conservation Areas and World Heritage Sites
Policy 3.19 Archaeology
Policy 3.20 Tall Buildings
Policy 3.22 Important Local Views
Policy 3.28 Biodiversity
Policy 3.29 Development within the Thames Policy Area
Policy 3.31 Flood Defences
Policy 4.2 Quality Of Residential Accommodation
Policy 4.3 Mix Of Dwellings
Policy 4.4 Affordable Housing
Policy 4.6 Loss Of Residential Accommodation
Policy 5.1 Locating Developments
Policy 5.2 Transport Impacts

Policy 5.3 Walking and Cycling

Policy 5.6 Car Parking

Policy 5.7 Parking Standards for Disabled People and the Mobility Impaired

Policy 5.8 Other Parking

Supplementary Planning Documents

54. The relevant supplementary planning documents and guidance documents from the local development plan are as follows:
55. Blackfriars Road SPD (2014)
Residential Design Standards SPD (October 2011 with 2015 technical update)
Affordable Housing SPD (2008 and draft 2011)
Design and Access Statements SPD (2007)
Section 106 Planning Obligations and CIL SPD (2015 and 2017 addendum)
Sustainable Design and Construction SPD (2009)
Sustainable Transport Planning SPD (2009)

Emerging policy

New Southwark Plan (NSP)

56. 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.
57. 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.
58. 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.
59. 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.
60. 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. The most relevant policies of the NSP are as follows:

P1 Social rented and intermediate housing
P2 New family homes

P3 Protection of existing homes
 P6 Housing for older people
 P7 Wheelchair accessible and adaptable housing
 P12 Design of places
 P13 Design quality
 P14 Residential design
 P15 Designing out crime
 P16 Tall buildings
 P17 Efficient use of land
 P18 Listed buildings and structures
 P19 Conservation areas
 P20 Conservation of the historic environment and natural heritage
 P22 Archaeology
 P27 Access to employment and training
 P29 Office and business development
 P30 Affordable workspace
 P34 Town and local centres
 P41 Pubs
 P44 Healthy developments
 P46 Community uses
 P48 Public transport
 P49 Highway impacts
 P50 Walking
 P52 Cycling
 P53 Car parking
 P54 Parking standard for disabled people and the physically impaired
 P55 Protection of amenity
 P56 Open space
 P58 Green infrastructure
 P59 Biodiversity
 P60 Trees
 P61 Reducing waste
 P63 Contaminated land and hazardous substances
 P64 Improving air quality
 P65 Reducing noise pollution and enhancing soundscapes
 P67 Reducing flood risk
 P68 Sustainability standards
 P69 Energy

Site allocation NSP13

61. The application site is located within New Southwark Plan site allocation NSP13 – ‘Conoco House, Quadrant House, Edward Edwards House and Suthring House.’
62. The site allocation sets out that redevelopment of the site must:
- Provide at least the amount of employment floorspace (B class) currently on the site or
 - at least 50% of the development as employment floorspace, whichever is greater; and
 - Provide active frontages with ground floor town centre uses (A1, A2, A3, A4, D1, D2) on Blackfriars Road; and

- Retain or re-provide Edward Edwards Almshouses (C3); and
- Provide public realm improvements including new routes to Burrell Street and Teveris Street
- Street.

63. The site allocation also considers that ‘redevelopment of the site should provide new homes (C3).’ An indicative capacity of 124 homes (net) is given across the site.
64. The NSP responds positively to the NPPF, by incorporating area visions, development management policies and 82 site allocations which plan for the long term delivery of housing. The NSP responds to rapid change which is occurring in Southwark and London as a whole and responds positively to the changing context of the London Plan.

ASSESSMENT

Principle of the proposed development in terms of land use

Introduction

65. The redevelopment of the site would be office led, creating a significant uplift in Class E office space in a tall building fronting Blackfriars Road with an active frontage for the large office reception and public house use (Class Sui Generis) at ground floor level. To the rear of the site, provision of the ground floor community use (Class F2) and smaller scale offices at first floor level, with the residential almshouses above (Use Class C3) would provide a more domestic character to the development, set back behind and overlooking the landscaped community public space and garden, with enhanced public realm along the site boundaries.

Policy background

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

London Bridge and Bankside Opportunity Area

68. The London Plan designates the London Bridge and Bankside as one of 12 Opportunity Areas in the Central London growth corridor area. It notes that this area has considerable potential for intensification and scope to develop the strengths of the area for strategic office provision. This is reflected in Policy SD1 (‘Opportunity areas’) which sets a indicative capacity of 5,500 new jobs and 4,000 new homes.

69. Strategic Targets Policy 2 of the Core Strategy underpins the London Plan and states that Southwark's vision for Bankside, Borough and London Bridge is to continue to provide high quality office accommodation, retail and around 25,000 jobs by 2026. Additionally, Strategic Policy 10 states that between 400,000sqm and 500,000sqm of additional business floorspace will be provided within the Opportunity Area to help meet central London's need for office space.

Central Activities Zone and London Bridge District Town Centre

70. The site is located within the Central Activities Zone (CAZ) which covers a number of central London boroughs and is London's geographic, economic, and administrative core. The London Plan recognises the well-established long term demand for office space within the CAZ and strongly promotes office provision within this policy area.
71. Strategic Targets Policy 2 – Improving Places of the Core Strategy states that development in the CAZ will support the continued success of London as a world-class city as well as protecting and meeting the more local needs of the residential neighbourhoods. It also states that within the CAZ there will be new homes, office space, shopping and cultural facilities, as well as improved streets and community facilities.
72. In addition the site is within the Bankside and Borough District Town Centre. Saved policy 1.7 of the Southwark Plan states that within the town centre, developments providing a range of uses will be permitted, including retail and services, leisure, entertainment and community, civic, cultural and tourism, residential and employment uses.

Emerging Bankside and Borough Area Vision

73. 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

Conclusion on policy designations.

74. The principle of a large scale development containing a mix of uses including E Class office space, a Sui Generis public house, F class community use and self-contained residential accommodation for elderly occupiers would support the role and functioning of the Central Activities Zone and the Bankside and Borough District Town Centre, as well as being consistent with the policies for the

Opportunity Area and the NSP designation. The acceptability of each use will be considered below.

Proposed Non-residential land uses

75. As set out above, the site falls within the CAZ, where office and employment uses are strongly promoted. The Core Strategy at Strategic Policy 10 Jobs and Businesses targets the provision of around 400,000sqm-500,000sqm of additional business floorspace over the plan period in the Bankside, Borough and London Bridge Opportunity area (referred to in the 2021 London Plan as the London Bridge and Bankside Opportunity Area) to help meet central London's need for office space.
76. The site does not currently provide office floorspace (although offices currently exist on the other part of the NSP13 site, hence the reference to the need to re-provide office space in any development). The application would provide approximately 30,400sqm GIA of Grade A Use office floorspace, with the potential to provide up to 2,270 jobs. In addition, approximately 420sqm of office floorspace is created at ground and first floor levels beneath the almshouse flats, for use by the applicant, Southwark Charities, and other occupiers. This would primarily be located at 1st floor level. The provision of offices satisfies the aims of the Core Strategy and London Plan in creating new jobs and high quality office space within the Central Activities Zone and the Opportunity Area, and of the NSP site allocation in terms of providing more than 50% of the floorspace on this part of the site as offices.
77. The commercial offices of the proposal would provide approximately 19,000sqm net of office space wrapped around the central service core. The open plan floorplates would be able to accommodate flexible layouts tailored to tenants, while full-height windows against the 2.9m floor-to-ceiling heights would provide ample natural daylight and outlook. Louvres would be provided on the upper portions of the windows for solar shading purposes.
78. The primary office floorplates would be complemented by the provision of the extensive roof terrace amenity spaces in addition to the large atrium and mezzanine levels above, able to accommodate flexible working areas. The ground floor public house would also be accessible from within this atrium area by way of a moveable partition wall, providing the opportunity to blend these aspects of the publically accessible areas of the commercial volume of the proposal and enhancing the perception of activity within the Blackfriars Road frontage.

Affordable workspace

79. London Plan Policy E2 ('Providing suitable business space') seeks the provision of low cost E Class business space to meet the demand of micro to medium sized business as well as start-ups and enterprises looking to expand. The policy requires that proposals for new E Class spaces over 2500sqm in size (or a locally deemed lower threshold) should consider the provision of a proportion of workspace that would be suitable for these target businesses.

80. London Plan Policy E3 relates specifically to affordable workspace and states that “In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purposes”. The policy identifies the circumstances in which it would be appropriate to secure affordable space. Part B of the policy specifically identifies the CAZ as an important location for securing low cost space for micro, small and medium sized enterprises.
81. Emerging Policy P30 of the New Southwark Plan deals with affordable workspace. Criterion 2 of the policy requires Major ‘B Class’ (now E Class) development proposals to deliver at least 10% of the new floorspace as affordable workspace on site at a discounted market rent for a period of at least 30 years. The policy recognises that there are many different forms that such a space could take depending on the site location, characteristics and existing/proposed uses on site.
82. Taking into account the requirements of emerging policy P30, the proposed development would need to provide at least 10% of the new E Class floorspace as affordable workspace. This would equate to 3,252sqm affordable workspace being required. The applicant has agreed to provide this as part of the proposal. As such the quantum of affordable workspace being provided is compliant with the London Plan and New Southwark Plan policies.
83. The affordable workspace offer would be provided at a 25% discount on the market rent with 6 month rent-free period. In addition, the Section 106 Agreement will include a dedicated ‘affordable workspace’ schedule. This will ensure, among other things, that:
- the workspace is provided for a 30-year period at the discounts set out above;
 - no more than 50% of the market rate floorspace can be occupied until the affordable workspace has been fitted-out ready for occupation;
 - detailed plans showing final location of affordable workspace are submitted for approval;
 - a management plan is in place to secure the appointment of a Workspace Provider and a methodology for that Provider to support the occupiers;
 - appropriate marketing of the affordable workspace will be conducted; and
 - the rates and service charges payable by the tenant will be capped.
84. The proposed Affordable Workspace Offer meets the policy requirement in terms of both the quantum of space and the terms agreed which define and control its affordability. This is a positive aspect of the scheme which is supported.

Public House

85. Draft New Southwark Plan policy P41 ‘Pubs’ seeks to protect existing public houses which have been subject to development proposals. This is partly on the basis of the contribution to the character of the built environment many public houses, as historic buildings, provide. It is also on the basis of the social and community function public houses provide for the inhabitants of a local area.

86. Given the existing Prince William Henry public house building is of little architectural or historic value, there is no objection to the redevelopment of the building, provided that the pub use is re-provided. Space for a new pub, across two floors, has been proposed, with a frontage onto Blackfriars Road and two areas of outdoor seating. The floor area of the new pub would be 523sqm, over double the size than the existing Prince William. This complies with NSP policy P41, and the site allocation which has a replacement pub as a required use.

Community use

87. The Core Strategy’s Strategic Policy 4 (‘Places for Learning, Enjoyment and Healthy Lifestyles’) affirms the provision of community facilities and spaces through new development. Saved Southwark Plan policy 2.2 (‘Provision of new community facilities’) specifically requires that new facilities proposed are open to and able to be used by all members of the community. The draft New Southwark Plan policy P4 (‘Community uses’) stipulates this also.

88. The proposed community use (Class F2) would comprise approximately 200sqm located in the ground floor of the almshouse building. It would front onto Nicholson Street to the south and the proposed landscape public space to the east and would be managed on behalf of Southwark Charities. The intention is for the use to function as a ‘village hall’, open to members of the public and is one of a number of ways the development seeks to encourage the potential for interaction between the elderly residents occupying the almshouses and the wider community. On this basis there is no objection to the principle of the proposed community use.

Proposed new public space with community space on the ground floor



Residential land uses

89. The site contains a number of existing residential flats. There are six self-contained residential units (Use Class C3) located on the first and second floors of Suthring House, above the existing public house, and 25 almshouse flats to the rear.
90. Saved Southwark Plan policy 4.6 ('Loss of Residential Accommodation') and draft new Southwark Plan policy P3 ('Protection of existing homes') prohibit a net loss of existing housing on a site. On the basis of the proposed 62 almshouse units plus the single caretakers flat, there would be no net loss of existing housing as a result of the development proposal under the terms set out by these policies.
91. The existing 6 units within Suthring House are general needs housing provided on the open market for sale and/or rent. This type of housing would not be provided for within the new development. The proposal contains no housing for private market occupation, but the adopted and emerging policies contain no requirement to reprovide private tenure housing, only that the level of overall housing must not reduce. This is therefore acceptable, and the significant uplift in the total amount of housing is strongly supported.

Conclusion on land use

92. The provision of office space in this location is strongly supported by the London Plan and adopted and emerging policies in the council's local plan. Providing a mix of uses, including self-contained residential accommodation, in addition to a public house and community use is appropriate for a town centre location such as Bankside. The range of proposed uses would help contribute to both the activity and mix of uses within the CAZ in addition to meeting the needs of the local community. Both of these aspects of land use consideration continue to benefit from strong support in the development plan. The proposal raises no in-principle land use issues and is therefore considered to be acceptable in land use terms.

Housing

Affordable housing

93. New Southwark Plan policy P1 ('Social rented and intermediate housing') requires major development to provide a minimum of 35% of housing proposed as affordable housing, measured by habitable room. This requires a minimum split of between 10% intermediate housing and 25% social rent.
94. The proposal has been brought forward by Southwark Charities, who own and run the existing Edward Edwards House almshouses. It would provide 100% affordable housing specifically for the elderly, as a form of specialist 'social housing.' The Edward Edwards House flats are currently provided to existing tenants on site rent free, with a small £25 per week 'maintenance charge'. This is substantially cheaper than conventional social rent levels, and is designed to minimise the number of residents who need to rely on housing benefit.

95. This arrangement would be carried forward within the new development, secured in the S106 agreement. The housing would be secured to ensure that it is retained as at-maximum an equivalent social rent level in perpetuity. While there is no provision of intermediate housing as per the requirements of P1, this is considered to be offset with the unusually high level of provision of social housing within the scheme. The proposal is considered to be compliant with policy P1 in this regard, and would provide very affordable accommodation.

Provision of housing for older people

96. Neither the council's saved Southwark Plan policies nor the Core Strategy directly addresses the provision of specialist housing for older people. The London Plan 2021 policy H13 ('specialist older persons housing') supports the provision of housing for older people. Draft New Southwark Plan policy P6 ('Housing for older people') supports the provision in the borough, subject to particular requirements being met. This includes providing social rented and intermediate affordable housing or specialist affordable housing for older people, providing excellent accessibility and amenity for elderly residents and be located in areas suitable for older people such as accessible town centre locations.
97. The level of provision of accessible and communal facilities for the residents would be excellent, comprising a public garden, resident's lounge, social spaces and residential facilities on each floor and a private roof terrace. Further detail on the quality of accommodation is provided below.
98. The site is located within the Borough and Bankside District Town Centre and an area of a high level of public transport accessibility. The site is within walking distance to a large number of shops and services which are utilised by existing elderly residents and would continue to be in the future.

Quality of residential accommodation

99. The proposed residential almshouse units would generally be laid out as 5 flats per floor, with paired floors (of 10 flats) providing widened corridors creating social meeting spaces and external communal balcony spaces.
100. The aim of this arrangement is to foster interaction between the residents by providing the opportunity for incidental meeting. Each floor would accommodate a separate drying room and ancillary store facilities for use by residents, carers and building management. The corridors themselves would be generously sized to accommodate further seating, planting and would terminate with a full height window providing natural light and outlook to the north and south.
101. The flats themselves, all one-bedroom units, would typically be between 54sqm – 56sqm GIA, exceeding the minimum 50sqm set out in the council's 2015 update to the Residential Design Standards SPD. Open plan kitchen/living/dining areas (25sqm), bedrooms (16sqm) and bathrooms (5sqm) exceed the minimum standards set out in the SPD. The wheelchair units, located on the southern portion of the block, would be approximately 65sqm and similarly exceed the minimum standards set out in the SPD, comprising a mix of those within the former South East London Housing Design Guide and the standards set out in Part M of the Building Regulations.

Typical almshouse floorplan



102. 25 of the 62 units would be dual aspect, which does not comprise the majority normally required in residential development. Each unit is articulated to give it a side return aspect and the full height windows and Juliet balconies will help maximise aspect and light. None of the single aspect units would be north facing.
103. As a scheme made up entirely of 1 bedroom flats, a higher proportion of single aspect units is inevitable (in most general needs housing developments, it is the larger 2 and 3 bedroom flats which enable more dual aspect flats to be created). The flats are generally high quality, with good daylight levels and generous glazing, and whilst the low proportion of dual aspect flats, and the absence of private balconies (see below) is noted, the reasons are understood and overall the standard of accommodation remains high, and will provide good quality affordable homes for the elderly residents.
104. In addition to the 62 flats, three guest suits are provided for occasional visitors and where necessary overnight carers. At approximately 34sqm these would not be suitable for permanent living accommodation, and a restriction from being used as full-time residential units would be secured in the S106. The caretakers flat would be a 2b3p unit and exceed the council's minimum space standards and would be dual aspect.
105. Due to the close relationship of the proposed residential units to the commercial offices and non-residential uses on the ground and first floors of the almshouse block, conditions regarding sound insulation, vibration, vertical and horizontal sound transmission and internal noise levels are recommended to be appended

to any grant of planning permission.

106. The proposed development, including the residential units, would be required to utilise an active cooling system in lieu of relying on mixed-mode ventilation such as also incorporating openable windows. While it was not considered feasible for openable windows to be relied on for the purposes of natural ventilation due to the high level of environmental noise which would not meet internal residential noise standards during the night time, the proposed design does incorporate large areas of openings at the Juliet balconies for residents.

Amenity and communal spaces

107. Following pre-application discussions, the applicant has opted not to provide flats with dedicated external private amenity space but instead to provide Juliet balconies with full height glazed doors. These sliding doors would provide a sense of openness to the units, although they do not provide truly external space.
108. The omission of dedicated private amenity spaces for each unit has been justified by the applicant on the basis that their inclusion for each unit would risk residents being isolated and minimise opportunities for social interaction which are crucial for mental health for older people. Provision of communal amenity spaces in lieu of private ones therefore is another way in which the design of the proposal seeks to encourage socialisation between residents.
109. The 2015 update to the Residential Design Standards SPD sets out that each residential unit is required to provide 10sqm of dedicated private external amenity space, with any shortfall on the 10sqm to be added to the general 50sqm communal external amenity space requirement. Taking into account the 10sqm shortfall on each unit, with 63 units proposed (including the care takers flat) this would equate to the requirement to provide 680sqm.
110. A communal roof terrace amenity space would provide approximately 319sqm. An additional 18sqm would be provided through the communal balconies located within the central bays of each two-floor cluster on floors 3, 5, 7, 9, 11 and 13, providing a total of 339sqm of dedicated communal external amenity space for use by residents. This is a shortfall on the strict policy requirement, however the proposal also provides the large community garden at ground floor level.
111. This would provide approximately 200sqm of a more enclosed soft-landscaped garden area, located directly in front of and accessible from an internal ground floor communal resident's lounge, and a more open, 290sqm area with hard and soft landscaping located to the south towards the corner of Nicholson Street and Chancel Street. These spaces would be publically accessible and for use by both residents and members of the public.
112. It is not customary to count public space provided by a development as meeting communal amenity space requirements, however the proposed provision of these spaces is another aspect of the scheme designed to foster social interaction and minimise risk of social isolation for the almshouse residents. In this instance the bespoke approach is considered to be appropriate and is supported. When counting these spaces as part of meeting the communal amenity space policy requirement, the proposal would significantly exceed the

minimum.

Proposed almshouse approach from Chancel Street



113. The proposal would provide a further 142sqm of internal communal space in the form of the ground floor and roof top level resident's lounges, in addition to the dedicated internal areas within the corridors of each floor for seating and incidental meeting totalling 218sqm. A total of 360sqm of internal communal space is therefore provided which, on balance, with the provision of the substantial, publically accessible ground floor community garden, is considered acceptable.

Conclusions on housing issues

114. The provision of 100% affordable housing is strongly supported. This does not strictly comply with the council's development plan policies in terms of mix, but this is considered to be offset by the significant benefit such an affordable housing offer would bring to the local community and the borough. The almshouse flats and communal aspects of the proposed residential accommodation would generally be of a high quality, exceeding minimum space standards and, through a mix of private communal amenity spaces, internal communal spaces and facilities, and the publically-accessible community garden, will provide residents with accommodation that has been carefully designed to meet their needs. On this basis the proposed approach to both the affordable housing offer and quality of accommodation is supported.

Design issues

115. Paragraph 126 of the NPPF stresses the importance of good design, considering it to be a key aspect of sustainable development. Chapter 3 of the London Plan deals with design related matters. In particular, Policy D4 focuses on delivering and maintaining good design, D5 on inclusive design and Policy D9 sets out the requirements for the development of tall buildings. The heritage polices of the

London Plan, set out in Chapter 7, assert that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.

116. The relevant Southwark design and conservation policies are Strategic Policy 12 of the Core Strategy and Saved Policies 3.12, 3.13, 3.15, 3.16, 3.17, and 3.18 of the Southwark Plan. Saved policy 3.20 deals specifically with tall buildings. These policies require the highest possible standards of design for buildings and public spaces. The principles of good urban design must be taken into account in all developments including height, scale and massing, consideration of local context including historic environment, its character, and townscape strategic and local views.

Site context

117. The existing Suthring and Edward Edwards House date from the 1970s, constructed in red brick in a simple functional style typical of the period. Suthring House is a three-storey residential block facing onto Blackfriars Road. It includes a pub at the ground floor and flats above. Edward Edwards House is a two-storey courtyard block of older persons housing located to the rear of the site and fronting onto Nicholson Street and Chancel Street.
118. The pub is accessed from Blackfriars Road, through an external seating area surrounded by a low wall. Main access to the residential properties is located on Nicholson Street which also includes the service access to the pub. The buildings are of little architectural or townscape value from a public perspective.
119. The site sits within a varied context, with neighbouring 1970s buildings Conoco and Quadrant House and associated car park to the north, the railway viaduct and smaller scaled Victorian buildings to the east, the low rise Rochester housing estate to the south and larger scale commercial buildings fronting Blackfriars Road to the south and west. Further north are a number of much taller buildings, recently completed or under construction, including 1, 18 and 240 Blackfriars Road and on the site of the former Ludgate House.

Proposal

120. The planning application is for the clearance of the existing buildings on the site; the excavation of three basement levels; and the construction of a new tall building, comprising part 22 and part 15 storeys, plus an additional storey of plant, reaching a maximum height of 91.8m (AOD). The development would include a landscaped public space on the eastern section of the site to provide a community garden.
121. The building is designed as two distinct volumes clustered together, distinguished through their massing and architectural treatment. The larger scale commercial offices would be to the west, fronting onto Blackfriars Road above the public house and large office reception. To the east, the building steps down to provide almshouse flats set above the ground and first floor offices, and a community centre.

122. The basement would include an additional level for plant as well as ancillary cycle storage and changing facilities. Although constructed as a single building, the two primary elements (the offices/pub and the almshouses) would function entirely independently.

Site layout

123. The proposed site layout and building footprint is well-conceived both in presenting active frontages to the primary streets, an improved east-west route along the north of the site, and new public realm primarily to the east.
124. Locating the larger scale office element towards the Blackfriars Road frontage, where there is a concentration of larger scale commercial buildings, is a logical and appropriate response to the site's context. At the front the building is set back to create a generous footway along Blackfriars Road. The pub is located on the north-west corner with a clear and distinct entrance and frontage to give it presence, and an area of outdoor seating albeit smaller than existing. At the south-east corner is the double-height entrance lobby of the commercial building.
125. The existing public route running along the northern boundary of the site would be retained and enhanced. This is currently a publicly accessible route, used by commuters to and from Waterloo station. The improved route would create further opportunities which come forward for any redevelopment of the buildings to the north with linked spaces.

Proposed site layout showing ground floor uses and functions



126. The lower element of the building, to the east towards Chancel Street, would contain the almshouses, the community space and charity office space. This reflects the more residential character of Chancel Street, although the building would be noticeably larger than its neighbours. In this location, the building is set back to provide the community garden taking up the full width of the site. This not only helps to provide the residential element with an open outlook but also offers some breathing space on Chancel Street that helps to mitigate its scale.
127. The new community garden would be visible from Blackfriars Road along

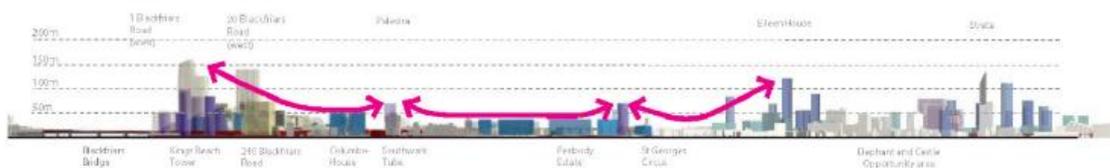
Nicholson Street with a feature tree proposed at the corner of Nicholson Street and Chancel Street. The garden would otherwise be revealed as pedestrians travel from through the smaller network of streets to the east and south, such as Treveris, Dolben and Chancel Streets.

128. Service access is proposed from Nicholson Street for both the commercial and the residential parts of the building. Given the constraints, this arrangement is considered acceptable in principle. Further consideration of the detailed servicing and access arrangements are set out in the Transport section of the report below.

Built form and scale

Building heights – site context

129. The site is surrounded by buildings at a variety of scales, with the dominant character established by those of a larger scale flanking either side of Blackfriars Road, and typically defined by the period of that building’s development.
130. The design and scale of recent development has been informed by the policies set out in the development plan, including the Core Strategy (2011) and the London Plan (2021), in addition to supporting guidance, such as that set out in the Blackfriars Road SPD (2014). The NSP Blackfriars Area Vision (AV.04) broadly reflects the guidance and approach to development in the SPD.
131. Guidance under SPD 5 (‘Building heights’) of the SPD states that the tallest buildings should be located towards the northern end of Blackfriars Road, with the tallest elements located around the junction of Stamford and Southwark Streets. It does not specifically define the extent of the area where very tall buildings would be appropriate.
132. The Background Urban Design Paper published with the SPD tested the capacity of the area and articulated the height profile of Blackfriars Road. It distinguishes the northern half of Blackfriars Road (north of the railway bridge) from the southern half and illustrates how the heights should undulate between the core of the cluster (around 180m tall) at the northern end of Blackfriars Road and the two ‘local landmarks’ (around 70m tall), one around Southwark Station and the other at St George’s Circus.



133. Recently implemented and consented developments generally reflect the principles defined by the SPD and include, on the western side of Blackfriars Road, the core of the emerging cluster as defined by 1 Blackfriars completed in 2018 at 170m tall and 18-20 Blackfriars consented at 185m tall. Other

developments then step down to the prevailing height and include The Hoxton at 32-40 Blackfriars Road completed 2019 (64m tall) and the Ibis/Novotel at 46 – 49 Blackfriars Road completed in 2012 (48m tall).

134. On the eastern side of Blackfriars Road the developments range from the 170m tall Ludgate House (now Bankside Yards) development (currently on site) and include 240 Blackfriars Road completed 2014 (89m tall).
135. The site is located in the northern half of Blackfriars Road where buildings are expected to step down from the tallest buildings (around 180m tall) at the core of the cluster, reducing in height as the road moves southwards towards the railway bridge. The SPD states that buildings which are significantly higher than 50m must demonstrate that they contribute positively to London's skyline both locally and in distant views, and make an exceptional contribution to the regeneration of the area.
136. The SPD also sets out a number of criteria for all tall buildings to comply with, many of which have been carried forward into the draft New Southwark Plan policy P16. More information on the extent of compliance with the criteria is set out in the assessment below.

Scale, height and massing

137. The proposal is for a large single building articulated as two stepped volumes – the larger-scaled office element located in the western portion of the site, at a maximum of 22 storeys, and the smaller scale residential-led element to the east, at a maximum height of 15 storeys. The commercial office element would have a maximum height of approximately 92m AOD (inclusive of rooftop plant enclosures) and is arranged as four extruded elements clustered together around the central core. From the maximum height of 92m each element steps down from the service core, and create a main parapet height onto Blackfriars Road of 78m AOD. This stepped down profile would, when viewed from the northern and southern elevations, form a cascade in mass towards the smaller-scale context to the east of the site. The eastern almshouses volume is set down a further 2 storeys from the lowest commercial office element and tops out at 15 storeys.
138. The southern, northern and western elevations would additionally be subject to vertical subdivision within their façades by way of architectural treatment. For the north and southern elevations, here the crease would contribute to forming three similar-width volumes with two thirds comprising the commercial office (distinguished by use of a 'crease' within the façade, intended to reference pinched fabric) and then the final third comprising the almshouses block. This approach helps to break up the mass of the building whose southern elevation would be visible as part of the townscape especially from the south and east.
139. The western elevation overlooking Blackfriars Road is the primary commercial frontage of the building and the development's tallest element. From longer views, including from the Roupell Street Conservation Area, the elevation would express its design as clustered elements both by the two storey step-down on the top, and the deep fabric-like crease running up the façade, where the two elements meet. The crease would break up the building's mass, increasing the

verticality of this element of the proposal.

140. In contrast to the unified appearance and continuous ribbon-windows of the commercial building, the almshouse building on the east would have a finer grain and a more domestically-scaled treatment in architectural detailing. This helps to distinguish the almshouses from the commercial block, reading as a separate element. At 15 storeys it will form a lower-scaled foreground to the commercial office volume on Blackfriars Road, and in longer views help provide an overall reduced bulk to the building. At the ground level, the building is set back behind a publicly accessible and generous community garden which softens the impact of its scale.

Proposed west, south and east elevations



141. The building would be of a similar scale to 240 Blackfriars Road to the north and would sit comfortably within the context of neighbouring contemporary developments on Blackfriars Road. It is also of a similar scale to the lapsed permission to redevelop Friars Bridge Court to the east (although little weight can be afforded to this permission since it is no longer capable of being implemented).
142. It would be substantially lower than the buildings in the early stages on construction at 18 Blackfriars Road to the north. It would be taller than the nearby Hoxton, located to the north of Friars Bridge Court on the west side of Blackfriars Road. This is not considered inappropriate however as both buildings have a similar sense of scale to their frontages, borne of both width and height and architectural treatment, which contribute to the sense of a civic-boulevard that the Blackfriars Road SPD seeks to foster.
143. However, the building is clearly much taller than its local neighbours to the south and east, and as a result will dominate these parts of its context. The low rise buildings to the immediate south means that in these views the building will be very prominent, although clearly viewed with the backdrop of the very tall buildings further north.

144. It is a large scale building, seeking to provide a variety of functions across different land uses, including the provision of new publicly accessible space. The scale, height and massing of the proposal is considered an appropriate response to the site's context, notwithstanding the contrast with immediate neighbours to the south, and would make good use of what is currently an underutilised site on a major road in central London. The scale and mass has been suitably articulated, both through the building's distinct volumes and, as elaborated on below, the architectural treatment.

Architectural treatment

145. The architectural design of the building helps to distinguish its two constituent parts whilst maintaining a common and unified language. The commercial volume on Blackfriars Road defines the architectural language for the development and the residential almshouses use the same visual language but softened with residential features like Juliet balconies and a change in the colour, tone and detailing of the lead material. In both instances the primary material of the building would be textured terracotta cladding, for the former an earthy red-orange, and in the latter a yellow buff-coloured finish. The buff colouration of the almshouses is intended to reflect the Victorian character of Chancel Street.
146. Each element is divided vertically into three well-defined parts, a base, middle and top which help to articulate the overall volume and skyline of the building and ground it appropriately. Both elements are complemented with green-coloured highlights at their respective base and top elements of the building. Terracotta is an appropriate material for the building and reflects the historic context of Blackfriars Road. This modern reintroduction of this traditional material contrasts appropriately with the more 'glassy' character of other taller buildings nearby.

Commercial office volume

147. The southern portion of the base of the commercial element fronting Blackfriars Road is designed with a generous inset triple height glazing-led atrium demarcating the primary access to the commercial office space. To the north, the public house frontage has a similarly glazed frontage, albeit with the triple height scale reduced to double height.
148. Both aspects of this frontage will help provide interest along an active frontage to Blackfriars Road, including views into the multi-layered mezzanine aspects within these parts of the building. The strong green vertical mullions running along the base would provide a distinctive colour scheme to the site, contrasting with the red terracotta of the floors above in addition to complementing and continuing the colour scheme of the base of the glazed tiles of the Edwardian Soap Factory building located to the immediate south.
149. The terracotta façade has been designed with rounded folds or pleats and includes rounded corners to give it the appearance of stretched fabric – a nod to the site's historic use for 'tenting' fields as part of London's textile industry. This extends to the inclusion of hanging peg-like features (tenter hooks) suspended above the inset glazed element at the base of the building. These folds or pleats

together with the 'hooks' give a strong verticality to the elevation of the building.

150. This motif is carried up through the building's west, north and southern façades with vertical threads protruding as parapet elements towards the top of the building. As each element on the main building steps down the core will be visible from a distance. The set-back elevations to the core at the upper-most storeys of the building are also clad in wave-form terracotta panelling in a green scheme to match the base.

Residential almshouses

151. The 15 storey residential volume to the rear of the site similarly utilises both a terracotta-led materials pallet, here in a yellow buff-like shade, as well as a fabric-like motif of curved façade panels.
152. Architecturally this element of the proposal is more understated than the commercial element. This is considered appropriate given both the quieter, more domestic nature of the residential use for this part of the building and the immediately adjacent sites, in addition to the chosen shade of terracotta better matching, rather than standing out from, the neighbouring historic buildings and railway viaduct constructed in typical London stock brick.
153. The primary eastern elevation would be split into 5 distinct bays, with the primary windows and Juliet balconies, and a central bay, containing the social spaces appearing as double height glazing with balconies every other floor. Vertical 'threads' and the curved terracotta panels continue the fabric motif from the commercial front of the building.
154. The base of the building is double height, with glazing affording light and views into and out of the community space, office elements and resident's lounge located here. Matching green horizontal elements, in addition to the primary entrance to the almshouses located within the central bay, would provide both a contrast to the yellow buff-led façade above in addition to an architectural connection to the otherwise distinct commercial volume to the west. At the roof level the almshouse building includes a set-back resident's lounge and landscaped terrace. This helps to complete the building appropriately and chimes with the visual language of the development.

Conclusion on architectural treatment

155. The architecture uses coloured terracotta coupled with devices and motifs inspired by the historic use of the site as a location of London's textile industry. This results in a building that would not only stand out from its more glassy neighbours, but also provide an elegant and highly articulated design that is inspired by the history of the site. The architectural treatment successfully links the two uses with a common but distinctive character. On this basis the proposed approach to the architectural treatment is supported by officers and would make a unique and successful contribution to the Blackfriars Road and the immediate area's streetscapes.

Tall buildings

156. The building reaches a maximum height of approximately 92m AOD, and would be significantly taller than the immediately neighbouring buildings to the south and east, which is characterised by low rise heights of between 3 and 6 storeys. However, the scale of neighbouring buildings increases to the west and north of the site progressively along Blackfriars Road, as described above. The site is located within the CAZ and Opportunity Area, where such high-rise intensification of development is potentially appropriate. Nevertheless, a tall building is expected to also comply with policy saved Southwark Plan policy 3.20 ('tall buildings') in full. These requirements are assessed below.

Point of landmark significance

157. The northern part of Blackfriars Road is recognised in the Blackfriars SPD as a location of landmark significance with the cluster of tallest buildings focused on the junction of Blackfriars Road and Southwark/Stamford Street. The locality not only stands at the confluence of a number of arterial routes but also includes the primary bridge link to the City of London and a station at the river crossing. The SPD acknowledges this and illustrates this site as being within the area mediating between the super-tall buildings at the core and lower scaled development nearby. At 92m the proposal is consistent with the principles set out in the SPD.
158. Through the guidance set out in the Blackfriars Road SPD, the strategy for permitting the tallest buildings to the north, and reducing in height to the south (with taller 'markers' in key locations), contributes to establishing the Blackfriars Road cluster as a central London landmark. This site, clearly subservient in height to the buildings to the north, which rise to a maximum height of 185m AOD, would successfully contribute to this strategy. Whilst it is noted that it stands taller than the arc indicated in the SPD (and included above), this diagram is only suggestive of a general hierarchy, not a literal distribution of height. The site is located within the CAZ and within the immediate surroundings of other tall buildings (both existing and consented). As such the application site is considered to be an appropriate location for a tall building.

Positive contribution to the landscape

159. Of the site's 0.34ha area, over a third (approximately 1,245sqm) would be given over to open accessible space providing a variety of functions, including 885sqm of public realm, approximately 200sqm for the resident's garden, and the public house external seating area of approximately 90sqm. This represents an increase of close to 700sqm, compared to the current approximately 500sqm, in the form of the existing public house external seating and hard standing public realm.
160. The proposed architectural treatment to the commercial volume, including use of the 'crease' in upper storey facades, in addition to the level and arrangement of glazing to the lower storeys fronting the public realm, would help to demarcate the location of the change in ground floor uses between the public house and office atrium fronting Blackfriars Road.

161. Overall, the improvements to the public realm, in addition to the new community garden, would provide a generous and attractive mix of hard and soft landscaped publicly accessible space and the landscape contribution is considered to be commensurate with the scale of development.

Highest architectural standard

162. As set out above, the proposed building is considered to have a successful and logical massing strategy, reflecting the two primary uses, and the architectural treatment reinforces this approach. The proposed architectural treatment of the façades, as detailed above, would provide a distinctive and visually interesting contribution to townscape views within the immediate and wider area. The proposed quality of office and residential accommodation is considered to be of an excellent standard.

Relates well to its surroundings

163. The proposed building seeks to relate to its more contemporary neighbours on Blackfriars Road in terms of scale and character, reflecting more recent developments such as The Hoxton, located to the immediate north west, 240 Blackfriars Road, and the planned 18 Blackfriars group of buildings. For comparison, it stands at a very similar height to 240 Blackfriars Road.

164. The reduction in height to the east is necessary to better relate to the smaller-scale character of the neighbourhood to the immediate east. Notwithstanding this reduction in height of the eastern element of the building, it will stand noticeably taller than the neighbouring buildings around Chancel Street and Bear Lane. As demonstrated by the images presented of local views, this building will be very prominent in some views due to the jump in scale. The success of the building in not appearing overbearing or unduly dominant is heavily reliant on the architectural detailing and the sculpting of the form on the upper levels. On balance, it is concluded that the building can make a suitable contribution to its surroundings when viewed in the round.

Positive contribution to the London skyline

165. The application was supported by a Townscape Visual Impact Assessment (TVIA). The site is not within protected 'London Panoramas' viewing corridors set out in the London Plan's London Views Management Framework (LVMF). It is within several 'River Prospect' views identified within the LVMF which have been tested within the TVIA. The site is located within Borough View 5, looking south from the Millennium Bridge, as identified in policy P21 'Borough views' of the NSP. The building would be visible in a range of longer views within the London skyline including from Southwark Bridge and from the Hungerford Bridge. It would generally be seen within the context of the emerging Blackfriars Road cluster, which is subject to a number of taller proposals currently under construction. In these views from the north, the building would largely appear subservient and as a secondary building in these skyline views and would not appear out of character for the area.

166. In TVIA View 9 from the Millennium Bridge (NSP Borough View 5) the proposal does not affect the silhouette of the Tate Modern building which is the Strategic

Landmark in the View and follows the effect of the stepped profile of the emerging cluster. Whilst it is visible in this view next to Bankside Lofts and 240 Blackfriars, there is no harm arising and the proposal appears as part of the distant backdrop.

TVIA 9 from the Millennium Bridge (NSP Borough View 5)



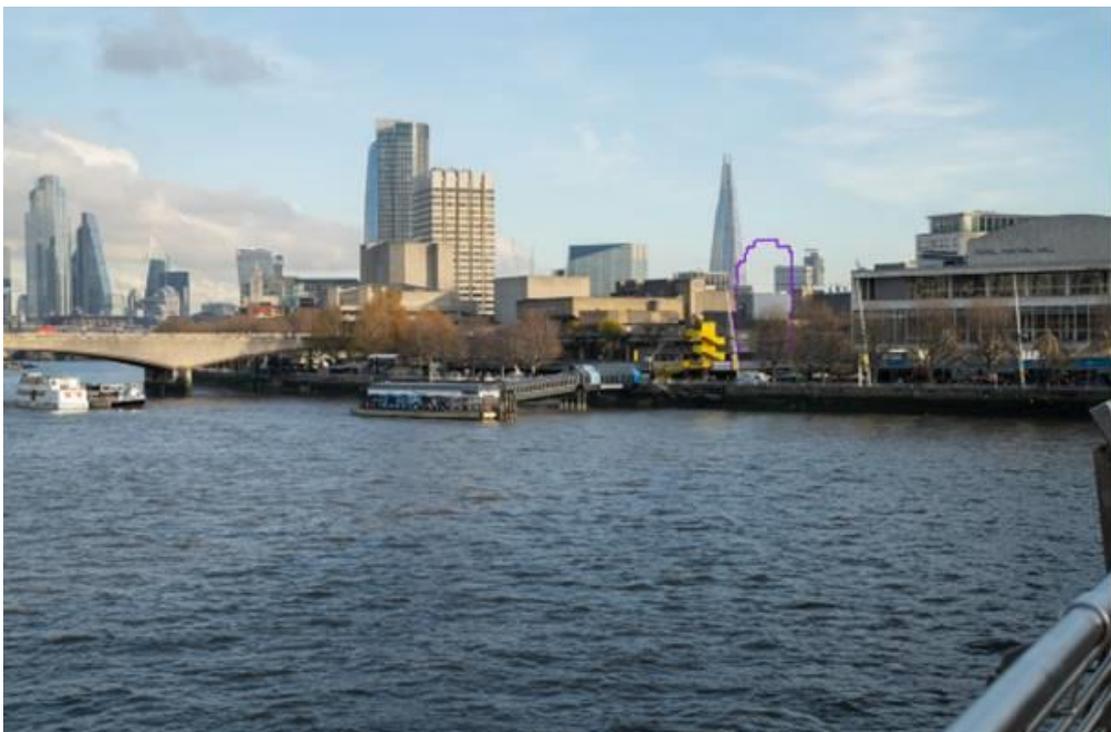
167. In TVIA View 14 from Southwark Bridge (LVMF View 12A.2), the proposal is completely masked by the Tate Modern extension) and the tallest of the Neo Bankside towers. As a consequence there is no harm arising and the Strategic Landmark of Tate Modern, including the lower townscape of the Globe and its environs remain unaffected by this proposal:

TVIA View 14 from Southwark Bridge (LVMF View 12A.2)



168. Finally in TVIA View 15 from Hungerford Bridge (LVMF View 17B.1) the proposal will appear in the distant backdrop in the gap between the Royal Festival Hall and the Hayward Gallery. The proposal does not affect the viewer's ability to recognise and appreciate these important landmark buildings and does not affect the principal focus of this view which is towards St Paul's Cathedral to the north of the river and a considerable distance from the proposal. There is no harm arising as a consequence to this important River Prospect:

TVIA View 15 from Hungerford Bridge (LVMF View 17B.1)



169. The articulation of the massing with the progressive step backs would be particularly effective in providing a distinct form in these views. In conjunction with the unique approach to architectural treatment of the façade and colour of the tallest, and so more prominently visible, commercial volume, the overall approach would ensure the proposal provides a distinctive tall building which contributes positively to the Blackfriars Road cluster and wider London skyline.
170. Further comment in relation to the impact of the building on local townscape views, including particularly with regards to the impact on heritage, is set out later in the report.

Visibility from the wider area

171. The submitted Townscape Visual Impact Assessment (TVIA) also includes a number of views and accurate visual representations of the proposed development from points around the local area. The views demonstrate that the building would be visible from a number of locations in the immediate vicinity of the site and further afield.
172. From the broadest easterly direction (including north east and south east) the building would feature prominently in selected views through the local townscape. It would mark a clear step-change from the lower rise surroundings to the east in the site's immediate vicinity and affirm the larger-scale character of Blackfriars Road itself. Given the successful approach to the articulation of both the massing and façade elements described above, the impact is not considered to be harmful.
173. The building would clearly contribute to the townscape of Blackfriars Road itself, providing a large robust façade. Due to the linear nature of the road, at some points the proposal would become less prominent, being obscured by other neighbouring buildings. This is generally the case when the proposal is viewed from further north on Blackfriars Bridge.
174. There are particular points along the road however (such as at the junction with Stamford Street to the north or The Cut to the south) where the building would provide a dominant presence in the immediate streetscape. The strength of the proposed approach to the façade and massing is however considered to adequately mitigate any sense of excess bulk and therefore harm to the streetscape in these instances.

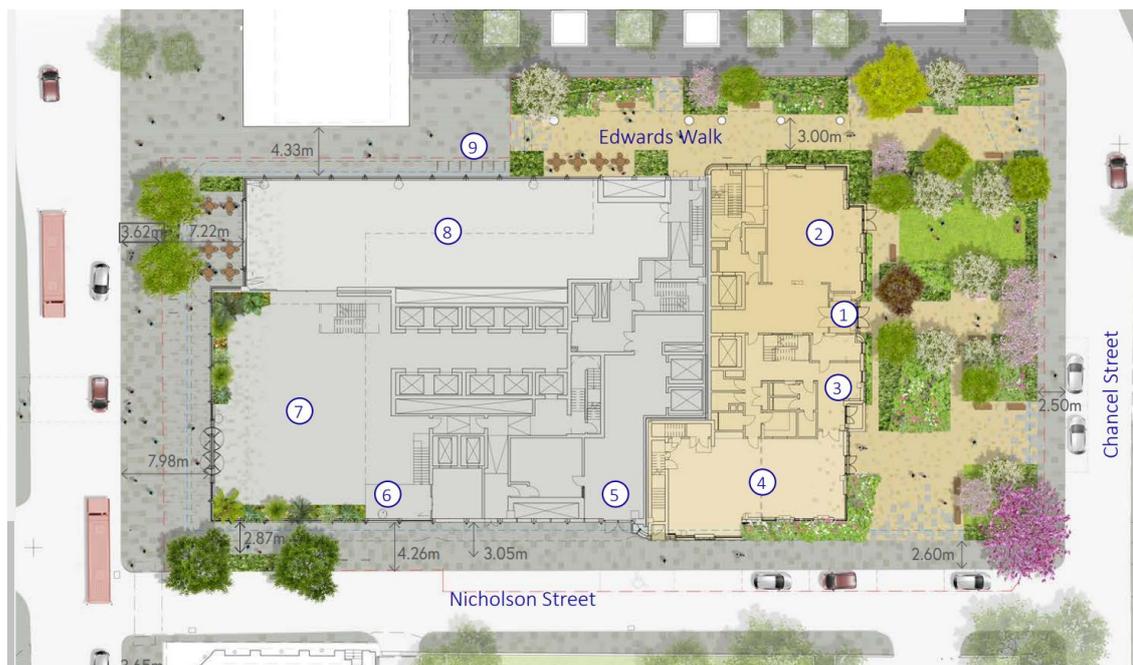
Conclusion on tall buildings

175. The proposal complies with the tall buildings policies as set out in the Core Strategy, the saved policies of the Southwark Plan and the Blackfriars Road SPD. The information submitted with the application demonstrates that this is a proposal of exceptional architectural quality with a highly articulated and complex form which successfully marries the commercial and residential functions. It will relate well to the other tall buildings in the locality and successfully articulates the change in scale from the tallest buildings in the north to the lower scaled buildings to the south and east.

Landscaping, trees and urban greening

176. The proposal would accommodate a substantial level of hard and soft landscaping across the site, most notably in the form of the public community garden. The proposal would see the removal of 6 small semi-mature trees from and adjacent to the site, however this would be more than adequately mitigated by the proposed planting of 24 trees on the site. These would be located predominantly within the community garden and the east-west pedestrian route along the site's northern boundary. In addition, the proposal would provide general upgrading of public realm and landscaped roof terraces on the upper storeys of the building for both the residential and non-residential occupiers and extensive green roofs.
177. The primary east-facing elevation of the residential almshouses block would accommodate climbing plants within its central bay. These would be utilised also on the southern elevation of the commercial office volume above the landscaped amenity terraces provided for office occupiers. This strategy overall would see the development achieve an Urban Greening Factor of 0.38. Commercial development is required to achieve a UGF score of 0.3 while residential development is required to achieve 0.4. Given the site is predominantly non-residential, and that this has been increased from an initially proposed 0.24 score, this is considered to have been maximised and is acceptable.
178. The proposed community garden area at the east end of the site would total approximately 550sqm and be split into two distinct parts: To the north, a more private, but still publically accessible soft landscaped area would be sheltered with a variety of small fruiting mutli-stem species of trees and shrubbery around a grassed enclosure. This would be located off and considered an extension of the residents communal lounge set into the ground floor of the almshouse volume.

Proposed ground floor landscaping strategy



179. To the south, located on the corner of Nicholson Street and Chancel Street, the space would accommodate a greater level of hard landscaping, primarily in sandstone, and provide a more open, but still generously planted area. In addition to supplementary planting of trees and shrubs within soft landscaped elements, a large 'feature' tree or sculpture would be positioned at the south-eastern most corner of the space to attract views from Blackfriars Road.
180. The site's boundaries to the east (fronting Blackfriars Road) south (fronting Nicholson Street) and a portion of the north (along Edward's Walk) would be paved with high quality York stone slabs. Hard landscaping along the remainder of the northern frontage would comprise sandstone paving enclosed by a variety of low shrub and hedge species as the route transitions towards the community garden to the east. Planting would also be accommodated on the boundaries of the inset public house seating fronting Blackfriars Road, in front of which two street trees would be planted.
181. The commercial office volume would accommodate landscaped amenity roof terraces on levels 17, 18, 19 and 20 at the points of the building's cascading set backs within the mass. The almshouse resident's volume would similarly accommodate a private roof terrace amenity space with primary aspect facing south and east.
182. Both of these sets of amenity roof terraces would be provided with a mix of hard and soft landscaping including, as noted above, climbing plants on the enclosing elevations. Species and positioning of the greening and landscaping at these levels taking into account drainage, wind and shade. A condition setting out the full details of species and landscaping specifications is recommended to be appended to any grant of planning permission.

Heritage

183. 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".
184. The NPPF provides guidance on how these tests are applied, referring in paras 199-202 to the need to give great weight to the conservation of the heritage asset (and the more important the asset, the greater the weight); evaluate the extent of harm or loss of its significance; generally refuse consent where harm is substantial; and, where necessary, weigh this harm against the public benefits of the scheme. Para 203 goes on to advise taking into account the effect of a scheme on the significance of a non-designated heritage asset.
185. The application was supported by a Heritage Statement which assesses the impact of the proposed development on local heritage assets located within the setting of the site.

Impacts on local heritage assets - listed buildings

Designated Heritage Assets



- Waterloo Conservation Area
- Roupell Street Conservation Area
- Grade II Listed Buildings
- Application site

186. As set out above, the site is located within the setting of several designated and undesignated heritage assets. The following Grade II listed buildings are close to the site:
187. To the north west, located on the opposite side of Blackfriars Road to the site:
- Christ Church, Blackfriars
 - No.s 1 – 3 Stamford Street
188. To the south east:
- 43 – 44 Dolben Street
189. No.s 45 Dolben Street and 4-8 Chancel Street have been identified as non-designated heritage assets located in the immediate vicinity of the site to the south east.

Dolben Street and Chancel Street

190. The two former town houses at 43-44 Dolben Street are grade II listed constructed in the later Georgian period. Their interior has been remodelled into one but they retain good exterior classical hierarchy with mansards. They were once part of a wider Georgian Street leading east/west.
191. The buildings' setting has seen many changes since construction with the loss of the rest of the street, the construction of the railway viaduct and the redevelopment of the area in the post-war period. They form a group with the

unlisted buildings at 45 Dolben Street and 4-8 Chancel Street as a good example of piecemeal mixed use 19th century development during the expansion of central London.

192. Their immediate setting is the urban street network of the railway viaduct, almshouses and Rochester estate with car park and green space on Nicholson Street, allowing for glimpsed views of the rear of the terrace on Dolben Street and framed views of the gable on Chancel Street. Their wider setting is the large development on Blackfriars Road, and its status as a principal street within the neighbourhood.
193. The buildings as a group are an historic anomaly in streets to the west of the viaduct which were comprehensively redeveloped in the post war era, with the exception of 209 to 215 Blackfriars Road. Much of the enclosed street pattern of the area was lost, and the construction of the Rochester Estate has eroded the previous network of streets and the historic setting, meaning the current setting does not allow for the significance of the buildings to be sufficiently appreciated.
194. The principal scale of the proposed development fronts Blackfriars Road, with the lower 15 storey element to the rear, closer to Chancel and Dolben Streets. The proposed open space allows for views across from the north and an improved landscape setting to Chancel Street and Dolben Street properties. The views of the gable at 6 Chancel Street would be preserved.
195. On balance, the scale of the development in close setting would dominate the buildings and their setting, however as the historic setting has been eroded through previous redevelopment, there would be minor, if any, harm to the significance of the buildings. In making a decision, the overall public benefit should be weighed in the balance against the minor harm to the significance of the building, as per para. 202 of the NPPF.
196. Harm has been minimised by the landscaping of the open space to the rear of the site which will create a street level buffer between the heritage assets and the development. The repaving of Nicholson Street would bring enhancements to the street paving.

Christchurch Southwark

197. The church is a detached building set in mature gardens facing Blackfriars Road. It is located on the east side of the street, approx. 300m from the site and is grade II listed. Constructed in 1958 after a fire destroyed the original building during the Blitz, the building was listed in 2010. The listing description mentions the stained glass windows as being of particular note.
198. Constructed in brick with simple Neo Georgian nave and tower at east end, the building sits back from Blackfriars Road within a mature planned garden, which provides a break in development along the street. Surrounding developments shield the building from views from wider vistas. While the scale of some of the buildings could be seen by some as in part eroding the setting of the building, the space (including views from Colombo Street) and mature trees in the immediate vicinity of the church still provide access to a 360 degree view of the

building in close quarters, and a break in development when travelling along the street.

199. There is no direct inter-visibility between the church building and the site owing to the set back of the church from Blackfriars Road, and the corner of no. 40 Blackfriars Road blocking the view, however the trees towards the front of church gardens are visible when standing on the pavement looking north from the street. As the main experience of the church is within a highly urban context of other tall buildings, and the proposal are of this typology and separated by some distance, the proposals would have a neutral impact on the significance of the asset.

1 Stamford Street and 3 Stamford Street

200. 1 and 3 Stamford Street are two grade II listed buildings located on the west side of Blackfriars Road, approximately 500m to the north. The buildings are located at the junction of Stamford Street, with no.1 a corner building facing the street. No .1 has a direct relationship with the junction, its front door facing the street, while no. 3 faces Stamford Street. The buildings are remnants of Victorian town centre development along Blackfriars Road, however now are surrounded by large development sites to the south, and the landmark tall building of One Blackfriars opposite to the north. Their setting, like Christ Church is highly urban, with a major historic thoroughfare being part of this experience. 1 Stamford Street is on Historic Englands' at Risk Register.
201. The proposed development is some 500m to the south and on the east side of the street. There is some very fleeting glimpsed visibility between the pavement outside the development site and the corner of Stamford Street, however looking north, this is set within the looming context of One Blackfriars, while looking south, the future 18 Blackfriars development will be prominent, as well as the façade of 240 Blackfriars Road, and the angled upper stories of Palaestra beyond the site. The busy atmosphere of Blackfriars Road, plus public realm including street trees and street clutter is also part of this experience whether travelling through or stationary. There would therefore be no impact on the significance of the assets, by altering one minor part of the listed buildings' setting.

Roupell Street and Waterloo Conservation Areas

202. The site is not located within a conservation area. It is located within the setting of the Roupell Street conservation area and a portion of the Waterloo Conservation area. Both are situated within the London Borough of Lambeth. This lies approximately 190m to the west of the site and comprises a distinct and well preserved network of streets hosting small terraced dwellings.
203. The Roupell Street Conservation Area is an historic enclave in a district which has otherwise experienced large scale redevelopment. Developed between the 1820s and 1840s, it comprises uniform streets of terraced housing, incorporating corner shops and a public house. The streets, Theed Street, Roupell Street and Whittlesey Street, represent an impressive and little-altered example of their type.

204. The significance of the conservation area is as a good and well preserved example of early 19th century artisan housing in a planned formal arrangement in terraces, using simple typology of houses fronting the street in London stock brick and timber windows. Roupell Street itself has a handsome streetscene, with two storey terraces with butterfly roofs visible from the street. Many of the terraces are grade II listed.
205. The wider setting includes a mix of 3 to 6 storey buildings, including the Victorian planned social housing tenement blocks of the Peabody Estate on Hatfields and the grade II listed St Andrews House development (now language school) also on Roupell Street.
206. In the vicinity and immediate setting of the conservation area is the modern 10 storey block of Colombo House and the upper storeys of the Novotel on Blackfriars Road. These form a clearly established part of the scale of development fronting Blackfriars Road. As the proposed development forms part of Blackfriars Road and fronts it to the east side, the wider part of the conservation areas setting would be affected.



207. The immediate setting of the conservation area, the Peabody Estate and the St Andrews House complex were constructed also during the Victorian era, and are part of the urbanisation of the area during the 19th century. These are located in the adjacent Waterloo Conservation Area. With Roupell Street, they form a group of assets whose significance lies in a planned formation of social housing and working class facilities for the local people of the time. This is evident in their form, function and architectural detailing.
208. There is further social housing of a similar 2-5 storey scale, also in the close vicinity dating from the mid to late 20th century in the east of Roupell Street, also within the Waterloo Conservation Area. This reinforces the character of the street

and preserves the significance of the conservation area by repeating the form and scale of the dwellings on Roupell Street.

209. Blackfriars Road has been a major throughfare since the 18th century, forming part of the “Blackfriars Mile”, linking Elephant and Castle to the South Bank and beyond to the City. The width of the street, plus the scale of the buildings historically on the street reflect its location within central London; since the late 20th century, the street has seen high rise and tall building development along its length.
210. A number of such buildings are clearly visible from Roupell Street conservation area and within the setting of part of the Waterloo Conservation Area looking east, and form part of the established wider setting of the conservation areas. Although the visibility of such buildings can reinforce the local network hierarchy, they dominate the skyline and have a neutral to negative impact on the significance of Roupell Street as a heritage asset.
211. The upper storeys of the proposals would be clearly visible in views along Roupell Street looking east. It would appear centrally in viewpoints, however would be flanked by Colombo House and Novotel on Blackfriars Road, both of which would be in closer proximity than the proposed development.
212. The impact of the proposed development would be experienced in the wider context and setting of the conservation areas however this would be from prominent viewpoints within the principal historic street of the Roupell Street conservation area. Taking into account the lack of change the immediate setting, and the scale of development in existence and permitted on Blackfriars Road, there would be some minor harm to the significance of the Roupell Street conservation area by development within the wider setting. This is mitigated in part by the distance of the development from the conservation area (over 200m to the edge) and the presence of similarly scaled modern buildings also in the views.
213. During the course of the application, officers requested amendments to the upper storeys of the development to help elongate and refine the top of the building in longer views. The purpose of this was to find an acceptably elegant solution to the issue of bulk of the upper floors, including in relation to the impact of the proposal on the views from within the Roupell Street Conservation Area and the setting of a portion of the Waterloo Conservation Area.
214. A solution, with a reduction of the upper storeys “shoulder” height leaving the impression of a slender “head” was found to lessen the impact on the skyline and the views out the of conservation area from Roupell Street. There would still be minor harm to the setting, however the impact overall is lessened with a more attractive building. In making a decision, the overall public benefit should be weighed in the balance against the minor harm to the significance of the building, as per para. 202 of the NPPF.

Conclusion on heritage

215. In conclusion, the proposal is likely to result in a low order of Less than Substantial harm to nearby assets as defined by the NPPF. In these instances

decision-makers are guided to avoid any harm and if harm is likely, consider in the balance the justification for that harm including the public benefits arising from the development. In this case it is considered there are considerable public benefits arising that can be considered in the balance including the substantial increase in affordable almshouse accommodation, the publicly accessible community garden, and the uplift in jobs including the provision of affordable workspace, arising from the redevelopment of the site. As a consequence, it is considered that the public benefits far outweigh any limited harm arising to the wider setting of the Roupell Street Conservation Area.

Design Review Panel

216. The proposals were reviewed by the Council's DRP at the pre-application stage in July 2020 when the form of the building was less well developed. The Panel generally endorsed the proposal and expressed their confidence in the design team as they develop their design going forward. They highlighted the tension between architectural expression and massing and encourage a more robust stepping and pleating to give the building greater articulation. They also highlighted the specialist studies needed for a building of this scale.
217. As a result of the Design Review Panel's comments the design was amended to introduce a two storey reduction in height and subsequently a 2-storey step changes at the roof level and a deeper creased design at the junction of separate elements. The façade of the almshouse building was also updated as was the detailed design of the community garden.
218. The quality of the design will rely to a great degree on the choice of materials and the architectural detailing of the façade. Conditions requiring a mock-up of the commercial and almshouse building facades, comprehensive sample panels of all cladding materials, and large scale architectural details of the constructed building are proposed in order to ensure that the constructed design is high quality and the cladding materials are appropriate in context.

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

219. Strategic Policy 13 of the Core Strategy sets high environmental standards and requires developments to avoid amenity and environmental problems that affect how we enjoy the environment. Saved Policy 3.2 of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Furthermore, there is a requirement in Saved Policy 3.1 to ensure that development proposals will not cause material adverse effects on the environment and quality of life.
220. A development of the size and scale proposed will clearly have potential significant impacts on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site.

Daylight and sunlight

221. A daylight and sunlight report was submitted to support the application. The report assesses the scheme based on the Building Research Establishments (BRE) guidelines on daylight and sunlight.
222. The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within dense urban environments and areas of modern high rise buildings, a higher degree of obstruction may be unavoidable to match the height and proportion of existing buildings.
223. Blackfriars Road has been identified as an area where tall buildings are appropriate and there are existing tall buildings in the close proximity such as at 240 Blackfriars Road, as well as the under-construction scheme at 18 – 20 Blackfriars Road to the immediate north west.
224. The BRE sets out the detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site.
225. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of their original value before the loss is noticeable. The level of impact of loss of VSC is generally quantified as follows

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

226. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of 20% in the area of sky visibility, daylight may be affected
227. The submitted daylight and sunlight assessment considers the impact of the proposed development on the following groups of neighbouring buildings:
228. Rochester Estate – located to the south of the site, comprising:
- 2 – 18 Nicholson Street
 - 1 – 14 Brinton Walk
 - 1 – 17 Rotherham Walk
229. Blackfriars Road east properties – located to the south of the site, comprising:

- 209 – 215 Blackfriars Road
- 203 – 208 Blackfriars Road

230. Blackfriars Road west properties – located to the west of the site, comprising:

- Ibis Novotel, 46 – 49 Blackfriars Road
- Colombo House, 41 – 45 Blackfriars Road

231. Blackfriars Road north properties, located to the north of the site, comprising:

- The Hoxton, 32 – 40 Blackfriars Road
- Conoco House
- Quadrant House
- 235 240 Blackfriars Road
- 240 Blackfriars Road

232. Chancel Street and Dolben Street properties – located to the east and south east of the site, comprising

233. • Railway arches 11 – 12 Chancel Street
- No.s 4 – 8 Chancel Street
 - 45 Dolben Street
 - 42 – 44 Dolben Street

234. East of the railway viaduct properties – located to the north east and east, comprising:

- 1 – 26 Friars Close
- 31 Bear Lane
- 36 Bear Lane
- 33 Bear Lane
- 31 Dolben Street

Daylight and Sunlight Testing Results

235. The BRE guidance advises that protection of neighbour's access to daylight and sunlight should be prioritised for residential uses given that non-residential uses have a less significant requirement for access to natural light. Of the affected neighbouring properties set out above, the following are both residential and comply with BRE standards:

- 235 Blackfriars Road
- 31 Dolben Street
- 45 Dolben Street
- 31 Bear Lane
- 33 Bear Lane

236. The following section of the report sets out results on the impact of the proposed development on residential neighbours where compliance with BRE guidance is not met.

Vertical Sky Component Daylight Test Results

Properties on the Rochester Estate

237. The Rochester Estate sits immediately to the south of the application site. It includes Nicholson Street, Brinton Walk and Rotherham Walk. The estate consists mainly of modern two-three storey modern terraced houses, each being dual aspect. Most feature similar layouts, with their primary living rooms facing south over their private gardens.

2-18 Nicholson Street

238. 2-18 Nicholson Street is a row of low rise houses directly to the south of the application site. Of the 94 windows tested, 46 are subject to a negligible impact. 48 are subject to a loss of daylight of 20% or greater of their existing VSC value. Of these, 7 are subject to a reduction in VSC values to a minor extent (i.e. up to 30%). 43 are subject to a moderate or major impact. The majority of these windows are north facing with aspect towards the site. As noted above, the properties themselves are dual-aspect however with living spaces overlooking private gardens on their south elevations, which remain unaffected by the proposed development.

Reduction in VSC	Windows affected
0-20%	46
21-30%	5
31-40%	1
41% +	42

1 – 14 Brinton Walk

239. These are similarly two-three storey houses located to the south of and running parallel to the Nicholson Street properties noted above. Of the 151 windows tested, the majority are subject to a negligible impact while 62 are subject to a loss of access to daylight of 20% their existing VSC value or greater. Of these, 22 are subject to a reduction in VSC values to a minor extent (i.e. up to 30%), while 40 are subject to a moderate or major impact.

Reduction in VSC	Windows affected
0-20%	89
21-30%	22
31-40%	14
41% +	26

1 – 17 Rotherham Walk

240. These are two-three storey houses located to the south of and running parallel to Brinton Walk. Of the 182 windows tested, the majority are subject to a negligible impact while 36 are subject to a loss of daylight of 20% or greater their

existing VSC value. Of these, 27 are subject to a reduction in VSC values to a minor extent (i.e. up to 30%), while 9 are subject to a moderate/major level of reduction.

Reduction in VSC	Windows affected
0-20%	146
21-30%	27
31-40%	2
41% +	7

45 Dolben Street

241. This is a two storey Victorian building located to the south east of the site. Of the 13 windows tested, one is subject to a loss of daylight of more than 20% their existing VSC value, however this is only by a marginal extent (21%).

4 Chancel Street

242. This is a four storey Victorian building located to the immediate south east of the site. Of the 18 windows tested, 14 are subject to a loss of daylight of 20% or greater of their existing VSC value, however 13 of these are subject only to a minor impact (i.e. up to 30% reduction in VSC value).

Reduction in VSC	Windows affected
0-20%	4
21-30%	13
31-40%	1
41% +	0

31 Friars Close

243. This is a four storey council housing block arranged in a half-perimeter block format, located to the north east on the other side of the nearby railway viaduct. The rear elevation of the block, partially facing in the direction of the application site, hosts deck access to flats on floors 1, 2 and 3. Of the 147 windows tested, the majority are subject to a negligible impact. 43 are subject to a loss of daylight of 20% or greater of their existing VSC value. 11 windows are subject to a moderate impact, while 28 are subject to a major impact. The majority of windows tested and impacted are located on the rear of the block where the deck access to flats across ground – third floors is accommodated and which overhang windows on the floor below.

Reduction in VSC	Windows affected
0-20%	104
21-30%	4
31-40%	11
41% +	28

244. Under BRE guidance, such an arrangement can be subject to further testing

confirm the extent to which the overhang of the affected building impacts access to daylight, as opposed to a proposed development, and factor that into the results. As part of the submitted daylight and sunlight assessment, this exercise was undertaken on the 31 Friars Close block which confirmed that, when discounting the impact of the overhanging deck access on the block's windows' access to daylight, the proposed development would have a negligible impact, with all windows meeting BRE guidelines.

Quadrant House

245. Quadrant House is an 8 storey post war housing block located to the north of the application site. The primary elevation affected by the proposed development is south facing and hosts bedrooms and living rooms. Of the 64 windows tested, 10 would be subject to a negligible impact, while 54 are subject to a loss of daylight of 20% or greater of their existing VSC value. Of these, 3 are subject to a reduction in VSC values to a minor extent (i.e. up to 30%), while 3 would be subject to a moderate impact (i.e. between a 31 – 40% reduction on the existing values). The remaining 48 would be subject to a major (40+) reduction in VSC values as a result of the proposed development.

Reduction in VSC	Windows affected
0-20%	10
21-30%	3
31-40%	3
41% +	48

246. As set out above, VSC measures the amount of daylight reaching a particular point on a window. It is not able to not take into account other factors which may provide a more comprehensive picture of the impact of a proposed development, as it may be experienced for the occupiers of a particular room behind the affected windows.
247. For example, of the 64 windows noted above, 32 comprise 16 pairs located on the corners of the building. One of each pair is located on the southern elevation facing the site, being double sized relative to the partner window, which itself comprises a large side return element on the eastern and western elevations of the building. Together each pair comprises a large wrap-around window for each of the rooms, which are understood to be living rooms.
248. It is not considered that the reductions noted in VSC here would be as significant as implied by the VSC tests, which has its technical limitations in providing a comprehensive picture of what the experience of the reductions may be for neighbouring occupiers in circumstances such as these.

VSC summary

249. Of the group of neighbouring residential buildings discussed above which hosted a window which did not meet BRE guidelines, a total of 670 windows were tested. Of these, the overwhelming majority, at 412 windows, complied with BRE standards, and would see a negligible impact incurred as a result. 258 windows

were subject to a loss of daylight beyond the maximum 20% BRE recommendation, with 151 of these subject a major (41%+) loss:

Reduction in VSC	Windows affected
0-20%	412
21-30%	75
31-40%	32
41% +	151

250. The low-rise nature of the existing buildings on the application site means currently neighbours are afforded an unusually high level of access to daylight for a central London context. This in turn means any form of modest increase in development scale is likely to have a proportionally significant impact on VSC values to neighbouring windows. This provides the explanation for the extent of a relatively high level of instances of a major loss of daylight noted above.

Daylight distribution

251. Daylight distribution (DD) testing (also referred to as the 'No Sky Line' test) was undertaken where the layouts of the rooms of potentially affected neighbouring windows were known. Daylight distribution measures the proportion of the area of a room which has access to daylight (via a direct line of sight to the sky) at the working plane level (i.e. 0.8m high).
252. Dimensions of potentially affected rooms can have a significant impact on daylight distribution results, therefore it is not advisable to assume or estimate these values for a more robust assessment. In this case, only a small number of rooms were tested for Daylight Distribution, where internal layouts were known. BRE guidance states that access to daylight by this measure may be adversely affected if there is a 20% reduction in the daylight distribution value.
253. Of the residential properties tested for daylight distribution, 4 habitable rooms in two Nicholson Street addresses were subject to losses in DD values greater than 20%. Two of these were bedrooms at first floor level, being subject to a loss of 40% and 80% respectively, while the other two were kitchen/dining rooms, subject to reductions of 70% and 43%.
254. Due to the application site's low rise nature at approximately two storeys (at the point opposite where these neighbouring properties are located), these neighbouring properties are currently subject to unusually high existing DD values, typically between 80 – 90% and in some instances 100%. On this basis it would be expected that any modest sized development would be likely to have a proportionally substantial impact on the relevant neighbouring properties access to daylight in particular instances such as those noted here.

Sunlight

255. BRE guidance states that sunlight should be quantified in terms of both Annual Probable Sunlight Hours (APSH) alongside the equivalent values for the winter

period (i.e. September to March) for windows that are situated within 90 degrees due south on a neighbouring building where they have the potential to be impacted by a proposed development.

256. BRE guidance states that a proposal may have an adverse impact on a neighbouring window's access to sunlight where the centre of the window:
- receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March *and*
 - receives less than 0.8 times its former sunlight hours during either period *and*
 - has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.
257. Where windows are stated as not meeting BRE guidance in the following sections, it is on this basis. Of a total of 487 residential windows tested, 33 did not meet BRE guidelines. Further details on where the instances of non-compliance are set out below.

31 Friars Close

258. 25 of the 33 above noted instances of non-compliance with the BRE guidance set out in the submitted Daylight and Sunlight Assessment are found to be at 31 Friars Close. However, as with the VSC tests, alternative testing without the deck-access overhangs, as permitted by the BRE guidance, confirms that the impact of the proposed development is negligible when excluding these from the assessment and in this instance all windows comply with BRE standards. The impact of the proposed development is therefore considered to be acceptable.

Quadrant House

259. 8 windows tested fail the BRE sunlight tests, however in each instance these are secondary side returns partnered with a much larger window to the same room which complies with the BRE standards and would not therefore be noticeable. The impact of the proposed development is therefore considered to be acceptable.

Overshadowing of amenity spaces

260. The effects of the development on overshadowing have been considered for the courtyard of 31 Friars Close to the north east and the private rear gardens of the Rochester Estate properties (comprising 2 - 18 Nicholson Street, 1 – 14 Brinton Walk and 3 – 17 Rotherham Walk). The results of the overshadowing testing confirmed that all spaces would be subject to a level of access to direct sunlight in compliance with BRE guidance with the proposed development in situ.

Conclusion on daylight, sunlight and overshadowing

261. The proposal would incur substantial reductions in access to daylight for a

minority number of residential neighbour's windows noted above. Whilst the overall proportion of rooms affected is small, for those living closest to the site the impacts are significant. This must be acknowledged as a negative aspect of the overall development. There are however a number of mitigating factors as set out above, particularly noting the currently high levels of daylight received and therefore the relatively significant impact from a higher building.

262. The BRE advises that its tests are to be used as guidance, and must be used and applied flexibly in response to the context of the site. In dense urban environments, where larger scale buildings are expected to be located, the numeric targets in the BRE must be viewed with this in mind. The proposal is not considered to have a significant impact on neighbour's access to sunlight, taking into account mitigating factors noted above, and would not incur an unacceptable level of overshadowing. Whilst noting and giving weight to the harm to neighbour amenity, it is considered, on balance, that the harm would not justify refusing planning permission, when assessed in the context of the area and the wider merits of the scheme.

Privacy and overlooking

263. The corner of the proposal's southern and eastern elevation would be located approximately 32m away from the nearest neighbour at No. 4 Chancel Street, while the southern elevation of the proposal would be approximately 18m away from the nearest Nicholson Street neighbours. The proposal's northern elevation would be approximately 30m from the facing southern elevation of Quadrant House located to the north.
264. The 2015 Technical Update to the Residential Design Standards SPD requires a minimum of 12m separation distances for across-street arrangements such as these. Therefore there is considered to be more than adequate separation distance between the proposal and potentially affected residential neighbours that there would not be any harm to neighbouring occupier's privacy.
265. An increase in incidental overlooking is likely to be incurred from both the residential and office occupiers to abovementioned neighbours, including into the private gardens of the Rochester Estate properties. This would be incurred by virtue of the tall nature of the proposal. However this level and type of overlooking would not cause undue harm to amenity given both the adequate separation distances noted above, in addition to the built up central London context of the site, for which a minor degree of incidental overlooking is to be expected.

Sense of enclosure and outlook

266. Given the scale of the proposal, the building would incur a sense of enclosure and reduce outlook for the above mentioned neighbouring residential occupiers who are located closest to the site. However, in addition to the adequate separation distances noted above mitigating this to an extent, several factors can be taken into account which further help mitigate the impact of the proposal in this regard:

Quadrant House

267. Occupiers of Quadrant House to the north are afforded large, wrap around windows to their living rooms on the corner of each side of the building. In addition to mitigating the impact of the proposal in daylight and sunlight terms, these also provide wider aspect to the east and west in addition to the primary aspect to the south. Considered in conjunction with currently open-air car park to the immediate south of these neighbours (and to the north of the application site) in addition to the 30m separation distance, the proposal is not considered to incur an unacceptable harm to outlook or incur an undue sense of enclosure on these neighbouring occupiers.

No. 4 Chancel Street

268. The properties to the east along Chancel Street, including the residential No. 4 located to the south east of the site, may incur a degree of sense of enclosure and reduced outlook as a result of the proposal. However, given the property's primary outlook and aspect is directly east facing the low-rise Rochester Estate properties, it is not considered that this would be to an unacceptable extent.
269. Any degree of harm to outlook or increase in sense of enclosure is considered to be adequately mitigated in virtue of the provision of the landscaped community garden and public space which would be planted with trees and provide a form of screening to the large building behind this. In addition, the set-back positioning of the proposal away from Chancel Street and into the west of the site plan would help to reduce the proposal's impact. On this basis, harm to the sense of enclosure and outlook is not considered to be unacceptable for neighbouring occupiers of Chancel Street properties.

Nicholson Street

270. Nicholson Street properties are considered to have the greatest potential to be subject to an increase in a sense of enclosure and reduced outlook as a result of the proposal. With the shortest separation distance of the above noted neighbours and facing north across to the site, the Nicholson Street properties, particularly the western-most houses numbered 2 – 10 are also subject to a degree of a sense of enclosure as existing from the rear elevation of the 6 storey Soap Factory office building located to the immediate west on Blackfriars Road.
271. The properties do however benefit from outlook and an open aspect both to the east, where lower rise buildings are located along Chancel Street, in addition to the south, where further low rise terraced homes of the remainder of the Rochester Estate are located. All the properties of the estate, including those on Nicholson Street, benefit from primary living spaces situated to the south of their floor plan which open onto their private gardens.
272. The change in the level of outlook and sense of enclosure from their perspective to the north would be substantial as a result of the proposal. However, this is partly borne of the existing low rise nature of the site, where the properties benefit from an unusually low-rise surrounding built environment for a central London context. Given these circumstance, the proposal is not considered to reduce outlook or incur a sense of enclosure to an unacceptable extent, and in this

regard the impact of the proposal is considered acceptable.

Noise, vibration and odour

273. A Noise Impact Assessment was submitted to support the application. This details measures for mitigating noise and disturbance from plant (power, heating and cooling machinery), and the commercial uses within the proposed building. The Council's Environmental Protection Team has reviewed the Noise Impact Assessment and recommended conditions regarding:
- submission of validation tests confirming plant noise levels
 - limiting the use of the commercial office's roof terraces to 22:00
 - submission of a scheme of sound insulation for the public house
 - restricting the operating hours of the public house to 08:00 – 00:00 daily and
 - restricting deliveries and servicing collection times for the non-residential elements of the proposal to between 08:00 – 20:00 Monday to Saturday and 10:00 – 16:00 on Sundays and Bank Holidays
 - Details of extraction, ventilation and flue system for the public house kitchen
274. Submission of a construction logistics plan and construction environmental management plan will be secured by S106 obligation and condition respectively. This will ensure the council will be able to adequately manage and approve mitigation strategies for minimising disturbance and potential harm to amenity to neighbouring occupiers and members of the public during the construction phase of the development.

Transport and highways

275. The NPPF states that planning decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
276. The London Plan 2021 seeks to maximise sustainable forms of transport through the integration of land use and transport. Sustainable forms of transport include, walking, cycling and public transport and the London Plan aims to have these forms of transport make up 80% of all journeys by 2041.
277. Core Strategy Strategic Policy 2 encourages walking, cycling and the use of public transport rather than travel by car. Saved Policy 5.1 of the Southwark Plan states that major developments generating a significant number of trips should be located near transport nodes. Saved Policy 5.2 advises that planning permission will be granted for development unless there is an adverse impact on transport networks; and/or adequate provision has not been made for servicing, circulation and access; and /or consideration has not been given to impacts of the development on the bus priority network and the Transport for London (TfL) road network.

Site context

278. The site is bounded by a public pedestrian passage way to the north, with Conoco and Quadrant Houses and the associated ancillary car park beyond; Chancel Street, the railway viaduct and associated properties between to the east; Nicholson Street and the Rochester Estate to the south, and Blackfriars Road and associated commercial buildings to the west. Blackfriars Road forms part of the Transport for London Road Network (TLRN).
279. The nearest station is Southwark Underground approximately 150m to the south. This is served by the Jubilee line. Approximately 300m to the north is Blackfriars Station, served by the Thameslink rail line. Bus stops for routes 40, 45, 63 and 381 and the night bus equivalents are accessible in close proximity to the site on Blackfriars Road and Stamford Street.
280. The site has a Public Transport Access Level (PTAL) of 6b, on a scale of 0 to 6b where 6b is the most accessible. The site is also served by the Mayor's cycle hire scheme. The nearest Cycle Hire docking station is located opposite the site on the western side of Blackfriars Road which has capacity for 42 cycles. There are a further two docking stations within 200m radius of the site, and a further three within 400m of the site.
281. Blackfriars Road hosts Cycle Superhighway 6 to the immediate west of the site, providing dedicated segregated cycle lanes and associated infrastructure for cross-London journeys between Elephant and Castle and Central London. Nicholson Street to the south of the site forms part of TfL's 'quietway' network of cycle routes.

Site layout

282. The proposed site layout would be simple and rational given the approach of providing a single building. The proposal would improve the street-level environment through provision of new and upgrading of the existing public realm, new active frontages and access points and the community garden. Connectivity would be improved by re-providing the existing passageway to the north of the site in the form of a landscaped and paved area with better passive surveillance, as well as accommodating public house seating.
283. The entire building would be serviced from Nicholson Street, given the lack of vehicular access from the north, and the desire to limit vehicle crossovers from Blackfriars Road. A servicing bay for large vehicles would be provided on Nicholson Street, while more frequent servicing by smaller vehicles would be accommodated on site. A disabled parking bay would be provided on Nicholson Street, with a further two spaces secured within the existing off-site parking area within off-street car park ancillary to Conoco and Quadrant Houses to the north (which is within the applicants ownership).

Trip generation

284. The Council's transport officer and TFL have reviewed the proposed development in terms of trip generation and impacts on the local transport network. This has also been considered by Transport for London, who raised no

objections to the proposal in terms of impact on trip generation or transport infrastructure capacity. As part of the council's assessment, the TRICS database has been reviewed, looking at comparable developments and travel surveys.

285. The commercial office element of the development would generate an additional 43 and 33 two-way vehicular movements in the morning and evening peak hours respectively. The residential almshouses and reprovided public house would have a negligible impact on two-way vehicular movements in the morning or evening peak hours. These levels of vehicular traffic would not have any noticeable adverse impact on the prevailing vehicle movements on the adjoining roads.
286. The applicant has proposed several travel plan initiatives encompassing the provision of cycling facilities (including showers, lockers and changing rooms) and travel information and the appointment of a travel plan co-ordinator who would promote sustainable travel consisting of organising and publicising events such as 'Walk/cycle to work week', Bikeability training and Dr. Bike maintenance workshops for the development. Submission of a travel plan and the commitments therein will be secured by a S106 obligation.

Servicing and deliveries

287. The servicing arrangements for this development would involve servicing primarily from an internal loading bay accessed from Nicholson Street. Larger vehicles, such as those delivering barrels to the public house, would be accommodated within an on-street loading bay on Nicholson Street. The servicing area would be shared between the public house and commercial office. The application was amended following comments from officers about servicing on Nicholson Street, and an internal loading bay was created to accommodate the smaller and more regular delivery vehicles.
288. A delivery servicing plan, including requirements for monitoring against targets with a bond payment where not met, will be secured by S106 obligation. As mentioned above, times for servicing and collection vehicles will be restricted by condition for the non-residential elements of the proposal to between 08:00 – 20:00 Monday to Saturday and 10:00 – 16:00 on Sundays and Bank Holidays.

Refuse storage arrangements

289. Dedicated basement level refuse stores would be provided separately for the commercial and residential elements of the proposal. These will be sufficiently sized with the commercial aspect supplemented by a compactor facility. The council's waste management team provided advice on the use and management of compacting facilities and these are recommended to be appended to any grant of planning permission as an informative. The ground floor level would accommodate a holding area for waste bins on collection days.

Car parking

290. Saved Policy 5.6 (Car Parking) of the Southwark Plan and Core Strategy Policy 2 (Sustainable Transport) state that residential developments should be car free. For office use, a maximum of one space per 1500sqm is permitted which would equate to a maximum of six spaces. No parking (except disabled provision) is permitted for retail or culture uses, while a maximum of 0.4 spaces are permitted for residential units within the Central Activities Zone.
291. The development would in general be car free apart from 3 accessible car parking spaces. One of these would be on-street located on Nicholson Street while two would be located within the existing off-street car park located to the immediate north of the site. One of these would be for use by almshouse occupiers while the other for the commercial office occupiers. The disabled parking bays will be secured by legal obligation within the S106 and will be required to be fitted with electric vehicle charging facilities.
292. Conditions will be added in order to prevent occupiers of the proposed development (apart from Blue Badge holders) from obtaining parking permits for any of the Southwark Controlled Parking Zones. Nicholson Street is currently host to 5 on-street parking bays which would be able to continue to be accommodated following completion of the development.

Cycle parking and cycling facilities

Long stay spaces and facilities

293. The development would provide 535 long stay cycle parking spaces located within the basement level cycle stores. The stores have been specified to TfL's London Cycle Design Standards. The office and public house store would accommodate 455 and 4 spaces respectively. 10% of the office spaces would be provided in the form of Sheffield stands, of which half would be able to accommodate specialist cycles such as tricycles and cargo bikes. This is in line with London Plan policy.
294. There would be a surplus of 27 spaces against London Plan requirements which would be available as the short stay spaces for visitors to the office to use. Normally these would be required to be provided within the public realm, however in this instance given the demand on the public realm for most of the site, and where not, the limitations of space, basement level provision is considered acceptable. TfL did not object to this arrangement. The basement level cycle parking would be supplemented by a bike maintenance station and shower and locker facilities.
295. The almshouses block would be afforded its own dedicated basement level cycle store, comprising 76 spaces. This would be below the level required in the London Plan at 1.5 spaces per one bedroom unit, however given these units are being provided specifically for older people, and expected to be used predominately by a single person, (generating a need for 62 spaces) the level is acceptable

296. The remaining 14 spaces would exceed the requirements for the almshouse block's 420sqm of office space, the care takers flat, and any almshouse staff requirement. 14 of the spaces (18%) would be provided in the form of Sheffield stands. A further 8 spaces (11%) would be as Sheffield stands spaced to able to accommodate larger specialist accessible cycles. This combined 29% of accessible cycle parking exceeds the 20% requirement for residential use which is supported. The basement level cycle store would also be provide space for mobility scooters.

Short stay spaces

297. In addition to the basement level short stay spaces provided for the offices noted above, 33 short stay visitor cycle spaces would be provided within the public realm. The majority of these would be located along the northern route and would be overlooked by the public house. Two sets of Sheffield stands would also be provided on the Blackfriars Road and Nicholson Street frontages. These would serve patrons of the pub, or short stay visitors to the offices.

Conclusions on transport issues

298. The proposed development comprises a logical and well considered layout that positively responds to site constraints, neighbouring context and opportunities to contribute to and improve public realm. The proposal would not have any significant impact on local transport infrastructure in terms of private vehicle trips or public transport capacity. The proposal would be car free and provide cycle parking in accordance with London Plan policy.

Environmental matters

Construction impacts and management

299. An outline Construction Logistics Plan (CLP) was submitted to support the application. This proposes a strategy for managing construction traffic and the site with a view to reducing the impact on the local highway network, neighbour amenity and members of the public safety.
300. It is proposed that construction vehicles would access the site from Nicholson Street by arriving from the west via Blackfriars Road. They would then either enter the Site or stop on-street within a dedicated loading area. Vehicles will depart to the east onto Chancel Street before travelling north to Burrell Street where they would head west and return to Blackfriars Road.
301. Vehicle movements would be staggered to reduce the potential for congestion at the site. This will ensure that materials are pre-booked in a timely manner on a "just in time" basis. A detailed traffic management plan will be established and a Full time banksmen / traffic marshals would be stationed on site and would be responsible for managing safe access and egress of all vehicular traffic.
302. Nicholson Street would be subject to temporary parking bay removals to facilitate access to the site and loading for construction vehicles. Signage will be provided

to alert pedestrians, cyclists and motorists of the construction works while temporary barriers and stop/go boards will be utilised where appropriate. Contractors will be required to adopt best practice measures with regard to air and water site pollution including dampened down surfaces, using covers and drop heights minimised, vehicle wash down.

303. A number of other best practice measures are set out in the CLP however it is recommended this outline be revised in full and submitted to the council for approval. This would be secured by S106 obligation. For the purposes of managing and mitigating environmental impacts of the construction period, including on air quality and dust and emissions, It is recommended a construction environmental management plan be secured by condition also.

Ecology and biodiversity

304. The application site presently has very low ecological value. The Council's Ecologist has reviewed the application and raises no objection. There is an opportunity, as part of the redevelopment, to provide ecological enhancement and the Council's Ecologist has recommended conditions relating to planting species, the installation of bird boxes and the provision of an Ecological Management Plan. Conditions would be imposed to secure the Swift bricks and biodiverse roofs whilst the Ecological Management Plan would be secured as part of the S106 Agreement.

Archaeology

305. The site is not located within an Archaeological Priority Zone established by adopted policy. It is however located within the proposed 'North Southwark and Roman Roads' Archaeological Priority Area set out in the draft New Southwark Plan. The underlying archaeology relates to the margins of the tidal mudflats of the 'Southwark Mainland' and the south island of roman Southwark. Prehistoric material was previously found to the north of this site, at 240 Blackfriars Road.
306. This material has the potential to be present on the two areas of tidal margin included within this development site. Other sites within Blackfriars Road have revealed some Roman exploitation of the land and island margins, medieval and post-medieval land management, agriculture and settlement. On this basis, conditions regarding archaeological evaluation, mitigation, reporting and basement level foundation design are recommended to be appended to any grant of planning permission.

Ground conditions and contamination

307. A 'Phase 1' land contamination assessment was submitted to support the application. The assessment concluded a low-to-medium risk of contaminants present in the ground under the site and that a further Phase 2 intrusive investigation should be undertaken in order to determine this and the appropriate mitigation and remediation potentially necessary. Conditions requiring submission and approval of this Phase 2 assessment and mitigation and

remediation strategy are proposed to be secured by condition.

Fire safety

308. The applicant has submitted a Fire Safety Strategy as part of the application in response to the requirements of Policy D12 – Fire Safety of the London Plan 2021. This policy requires developments to achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside space for appliances, incorporate features to reduce risk to life and injury in the event of a fire; be designed and constructed in order to minimise the spread of a fire; and provide suitable and convenient means of escape for all building users.
309. The policy requires that the Fire Strategy statement should include information in terms of the building's construction, means of escape for all users, fire suppression features and measures that would reduce risk to life and injury. The strategy should also include details of how access would be provided for fire service personnel and equipment as well as provision for appliances to gain access to the building.
310. The submitted Fire Statement has been prepared in accordance with Policy D12 of the London Plan. The Fire Statement sets out the risk profile for the building; confirms that there would be an automatic sprinkler system installed; provides information on length of evacuation routes; provides details of refuge areas; provides fire alarm category information; and also confirms that fire risk areas such as kitchens, engineering services, stores and service risers will be located within fire compartments.
311. The office stair cores will be designed as firefighting shafts, each including a firefighting lift. The almshouse element will also be provided with a fire fighting core including a firefighting lift, wet fire mains connection, and smoke vented lobby/corridor protection on each floor. Overall the Fire Strategy is considered to comply with the requirements of Policy D12 of the London Plan 2021.

Flood risk

312. The application site is located within Flood Risk Zone 3. The application submission was supported with a Flood Risk Assessment, Basement Impact Assessment and Outline Drainage Strategy. The main source of flood risk in Southwark is as a result of tidal activity within the River Thames which lies approximately 350m to the north of the site. It should be noted that the site would benefit from protection by the Thames Barrier up to the 1 in 1000 year event.
313. The Environment Agency reviewed and provided comments on the submitted FRA as a statutory consultee. They did not raise any objections to the proposed development on the basis of flood risk. Submission of a Flood Warning Evacuation Plan is recommended to be secured by condition.

Sustainable urban drainage

314. The sustainable urban drainage (SUDS) proposals for the site includes a combination of a surface water attenuation system on site using tree pits, green roofs and soft landscaping for rainwater harvesting, and permeable paving and an underground attenuation tank for controlled discharge. The proposed discharge rate would amount to the equivalent greenfield rate of 2l/s in accordance with policy. The strategy would provide sufficient storage for a 1 in 100 year storm event as well as an additional 40% climate change capacity. Full details of the proposed drainage strategy are recommended to be secured by condition.

Air quality

315. An air quality assessment (AQA) was submitted as to support the application. The site is located within an Air Quality Management Area. The submitted assessment considered:
- The impacts of the demolition and construction phase of the proposed development on dust soiling and concentrations of PM10 at existing sensitive receptors during the construction period;
 - The impact of construction of the proposed development from construction traffic; and
 - Whether or not the proposed development is 'air quality neutral';
316. The AQA therefore considers the impact of the construction and operational phases of the development on air quality. The key considerations during the demolition and construction phase of the development have been dust emissions as well as emissions from heavy goods vehicles. The impacts considered as part of the operational phase of the development (the building once completed) include emissions from road traffic generated by the development and emissions from the stand by emergency generator.
317. The demolition and construction phase of a development is temporary and short term. It is acknowledged that there would be an increase in the number of heavy duty vehicles on the roads as a result of the demolition and construction phase of the development. The AQA has demonstrated that this increase would have a negligible impact on air quality at such sensitive receptors as neighbouring residential occupiers. The development would not result in any significant dust effects with mitigation measures in place. Submission of details of a mitigation and a strategy for minimising dust and emissions from the construction period will be secured through a condition for a Construction Environmental Management Plan.
318. Once the development is completed and occupied it would become operational. Road traffic emissions associated with the operational phase of the development are not considered to have any significant effect on local air quality and would not lead to the national air quality objectives being exceeded. The heating, cooling and hot water would be provided by air source heat pumps and PV panels.

319. There would be an emergency stand by diesel generator and this would be operational for a maximum of 4.5 hours per year for testing and maintenance purposes and discharge from a flue located above the 90m roof level and at least 3m above any area where there is general access by occupiers of the buildings. The operational development would be air quality neutral in accordance with London Plan policy.

Wind

320. Wind microclimate has been considered within the submitted Wind and Microclimate Assessment. The assessment seeks to understand whether any undesirable wind conditions would be created on site or within the surrounding area as a result of the proposed development. It considers if the resultant wind speed changes would be suitable for the intended use of specific locations around the site in terms of comfort and safety.
321. The assessment adopts the Lawson Comfort Criteria which are the well established guidelines that have been in use for over 30 years. The Lawson Criteria establishes four pedestrian activities (comfort categories) taking into account that less active pursuits require more benign wind conditions. The four categories include: sitting, standing, strolling and walking. Testing is undertaken for both summer (i.e. calmest) and winter (i.e. windiest) scenarios.
322. Areas within and around the site at ground level, including areas where outdoor seating is proposed have been considered in addition to the terraces of the proposed building itself. Areas around other surrounding buildings, nearby bus stops, pedestrian thoroughfares and crossing have also been tested.
323. As existing, wind conditions on the site and the surrounding area are considered suitable for sitting use during both the windiest season and during the summer. At ground floor level the proposed development would incur minor affects in comfort level along the southern boundary of the site within Nicholson Street as well as to the immediate east of the proposed building where the community garden would be located.
324. Here the areas would be subject to comfort levels changing from being appropriate from sitting to standing, and in one small portion of the corner through-route of the community garden space, strolling, during the windiest season. For summer, the areas would largely maintain their existing sitting comfort level, with the exception of the corner through-route of the community garden where the level would change to being appropriate for standing use.
325. The area hosting the outdoor public house seating would retain sitting-category comfort levels. The proposed roof terraces would accommodate sitting and standing comfort levels across summer and sitting, standing and strolling levels across winter. For the almshouse roof terrace amenity space the small area subject to a strolling category during winter would be mitigated through the use of sheltering planting to improve comfort levels. Overall the conditions are considered appropriate for the intended uses and the impact of the proposed development is therefore considered to be negligible.

326. A Post Construction Wind Mitigation Review will be required as part of the S106 agreement in order to ensure the impacts of the proposal match those anticipated.

Light pollution

327. Consideration to light pollution and the proposed lighting strategy was given in the submitted lighting assessment. The strategy sets out the intention of providing suitable lighting for all aspects of the proposal with a view to both minimising light pollution, including to areas of soft landscaping on the proposed roof terraces which have the potential to provide habitat value, and enhancing the legibility and safety of site's public realm. A condition requiring submission of full technical details of lighting to be implemented for approval by the council is recommended to be appended to any grant of permission.

Climate change

328. Climate change has the potential to alter and affect the current environment and is likely to result in changes to average air temperatures, increased yearly rainfall and sea level rise. It is also considered that cloud cover could slightly decrease. All development projects create greenhouse gas emissions that contribute to climate change and have the potential to increase air temperature and therefore lead to significant environmental effects.
329. The proposal's design has incorporated a number of measures to minimise the creation of greenhouse gases including the type of materials being used, the proposed approach to the management of the construction site and period, the use of a building management system during the operational phase and the use of low carbon technologies. It is anticipated that greenhouse gas emissions from transport and servicing will reduce throughout the development lifetime with decarbonising of the national grid as well as the improved use of electric and low emission vehicles.

Energy and sustainability

330. 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 requires 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.
331. 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

332. As per the carbon emission reduction policies of the London Plan 2021 and local development framework, both the residential and non-residential elements of the proposal would be expected to achieve zero carbon (with offset permitted once a minimum on-site 35% carbon reduction against part L of the Building Regulations 2013 has been achieved).
333. The 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.
334. An Energy Assessment based on the Mayor's hierarchy was submitted to support the application, setting out 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

335. A range of passive and active measures are proposed, including:
- high thermal envelope performance to reduce uncontrolled heat transfer through the building fabric;
 - optimisation of glazing to provide a balance between minimising heat gain and maximising natural daylight (to reduce lighting energy);
 - openable windows to prevent overheating in summer and allow for natural ventilation of the residential units;
 - minimising heat loss from heating and hot water systems;
336. The active measures include:
- communal heating system to the building;
 - high efficiency ventilation systems including Mechanical Ventilation with Heat Recovery (MVHR) to residential apartments and non-residential elements;
 - low energy and high efficacy lighting systems, fittings and controls;
 - controls systems to monitor and operate the plant and equipment as efficiently as possible;
337. The reduction in carbon emissions achieved through these 'demand reduction' measures will reach 13% (against a 10% policy requirement) for the residential element and 16% (against a 15% policy requirement) for the non-residential element. This therefore complies with the London Plan.

Be Clean

338. The applicant is proposing a communal heat network supplied by a centralised on-site energy centre to serve both residential and non-residential elements of the proposal.
339. There are no nearby district heating networks within 1km of the site that the development could connect to. The location and technical specification of the proposed plant room would ensure future connection to any decentralised heat

network developed in the area would be feasible. This will be secured by a planning obligation.

340. An on-site CHP system is not proposed due to the scale of the proposal falling below the GLA's advised threshold of a minimum heat load equivalent to 500 dwellings in order to achieve the appropriate efficiencies. As such, no carbon savings are reported from the 'Be Clean' stage of the energy hierarchy.

Be Green

341. With respect to the "Be Green" tier of the hierarchy, the applicant has proposed:
- Centralised communal heat pump network comprising air source heat pumps and water-source heat pumps for hot water top-up
 - Rooftop mounted photovoltaic array for electricity generation, with roof coverage optimised to provide approximately 205sqm of PV surface area
342. With the proposed energy strategy, carbon emissions would be reduced by a total 50% on the baseline Part L 2013 Building Regulations. This significantly exceeds the minimum 35% on-site requirement and is a positive aspect of the scheme. Through 'Be Lean' and 'Be Green' measures, the applicant has demonstrated that opportunities for reduction in energy demand and utilising renewable energy generation on site have been maximised.

Be Seen

343. 'Be Seen' is the newest addition to the GLA's energy hierarchy, introduced in the London Plan 2021. It requires developments to predict, monitor, verify and improve their energy performance during actual operation.
344. In order to meet the requirements of Be Seen under Policy SI 2, the development is required to monitor and report on energy performance, such as through displaying a Display Energy Certificate (DEC) and reporting to the Mayor for at least five years.
345. As part of meeting the 'Be Seen' policy requirements, the applicant has committed to:
- conducting a predicted operational energy use analysis during the detailed design stage (and then measuring actual operational energy use once the development is in use, benchmarked against the in-design analysis);
 - using fully metered electricity and water supplies; and
 - using sub-meters to measure electricity, heating and cooling energy use, which would feedback energy consumption to each user group/ functional space/tenancy within the development.
346. This approach will ensure energy efficiency is delivered in reality, and is identified as best practice within GLA 'Be Seen' draft guidance. Requirements for complying with the 'be seen' part of the Mayor's policy, including timely submission of monitoring data to the GLA, will be secured by planning obligation.

Carbon offset payment

347. The proposal would achieve a site-wide carbon emissions saving on 2013 Part L Building Regulations of 50%. This equates to 227 tonnes of CO₂ per year, against the total baseline 451 tonnes CO₂ emissions estimated through the Part L of the 2013 Building Regulations. Therefore, 224 tonnes of CO₂ carbon emissions are required to be off-set by payment in lieu to achieve the equivalent carbon zero standard.
348. This would result in an offset payment of £638,400 on the basis of £95 per tonne of carbon per year over a period of 30 years. This will be secured by S106 obligation. To ensure the anticipated on-site savings are realised, the Section 106 Agreement will include two obligations, one requiring the development to be constructed in accordance with the Energy Assessment, and the other verifying the delivery of the carbon savings through a post-installation review process.

Whole life cycle and carbon capture

349. 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 unregulated emissions, its embodied emissions and the carbon impact of mid-life maintenance and end-of-life dismantling. For the purposes of the WLC assessments, the emissions are expressed in kg of CO₂ per sqm GIA of the development.
350. The applicant submitted a Whole Life Carbon Cycle assessment to support the application demonstrating that, under the methodology set out in draft GLA guidance, the development would incur 256kg of carbon emissions per sqm of GIA over its lifecycle based on the current level of carbon intensity of the national grid. It is anticipated this would be reduced to 234kg of carbon emissions per sqm in 60 year's time as the national grid decarbonises and becomes more efficient.
351. The assessment confirms the majority of the carbon emissions can be attributed to the processing and production of the construction materials to be used, particularly the large quantities of steel and concrete in substructure elements, the steel frame, and aluminium and glass for the façade and curtain walling systems. The assessment provides recommendations as to how emissions can be reduced further, including through maximising use of recycled materials and identifying product specification in fit-out.
352. A condition requiring the submission of further information on and commitment to implementing these measures is recommended to be appended to any grant of approval. This would include the requirement for submission of a post-construction assessment to report on the development's actual WLC emissions following fit-out compared against the anticipated reported in the WLC assessment.

Circular economy

353. Policy SI7 Reducing Waste and Supporting the Circular Economy of the London Plan requires referable applications to promote circular economy outcomes and aim to be net zero-waste. These applications are required to submit a Circular

Economy Statement to demonstrate:

- How all materials arising from demolition and remediation works will be re-used and/or recycled.
- How the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life.
- Opportunities for managing as much waste as possible on site.
- Adequate and easily accessible storage space and collection systems to support recycling and re-use.
- How much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy.
- How performance will be monitored and reported

354. A Circular Economy Statement was submitted to support the application. The statement sets out a commitment to further developing the implementation of circular economy principles in both the building and wider development's operational phase, including extending the lifespan of the development, in addition to implementation of an end-of-life strategy for the development according to circular economy principles, including disassembly and deconstruction. Commitments include implementing a pre-demolition audit of the existing building, structure and hard surfaces on the site to assess the potential options for maximising the potential re-use and recovery of the materials in accordance with the waste hierarchy. It is recommended that further information on these aspects of the circular economy commitments be secured by condition.

Overheating

355. London Plan Policy SI4 and Policy P68 of the 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:

356. • 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).

357. The applicant explored solutions to reduce the need for active cooling within the proposed development, however due to environmental noise (primarily from the railway viaduct located to the east of the site), relying on natural ventilation using openable windows was not a feasible option. As a result an active cooling system would be implemented to ensure the proposal complies with overheating risk requirements. A condition requiring submission of a further updated overheating study to comply with the London Plan policy since its adoption is recommended to be appended to any grant of planning permission.

BREEAM

358. Strategic Policy 13 of the Core Strategy requires the commercial elements of the development to achieve a BREEAM “excellent” rating. A BREEAM Pre-assessment report has been undertaken which demonstrates that “excellent” can be achieved for the non-residential elements of the scheme, meeting the policy requirement. It is recommended this is secured by condition.

Water efficiency

359. For the residential component of the development, the applicant has confirmed that the dwellings would have a maximum indoor water consumption of 105 litres per person per day, in line with the optional standard in Part G of the Building Regulations. This complies with Policy SI5 of the London Plan 2021.

Planning obligations (S.106 agreement)

360. Saved Policy 2.5 of the Southwark Plan and Policy DF 1 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 of the Southwark Plan is reinforced by the recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic Policy 14 ‘Implementation and delivery’ of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

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

361. Following the adoption of Southwark’s Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

Planning Obligation	Issue	Applicant Position
Affordable Housing	Secured 62 residential units at no more than social-rent charges in perpetuity	Agreed
	Restrict use of guest flats to prevent use as permanent accommodation	Agreed
	Restrict use of caretakers flat to staff	Agreed

	Submission of decant strategy to manage impacts of proposal on existing residents of Edward Edward's House	Agreed
Affordable workspace	10% affordable workspace, equivalent to approximately 3,252sqm of which 2,830sqm to be secured in the main office building element, remainder to be provided in the almshouse portion of the development Rent to be no more than 75% of market rate, with rent- free initial period and service charge caps Affordable work space marketing and management plan	Agreed Agreed Agreed
Archaeology	£11,171	Agreed
Carbon offset	£638,400	Agreed
Employment during construction	83 sustained construction jobs for unemployed Southwark residents, 83 short course places, 20 construction apprentices or pay £399,350 under the Employment and Training Contribution (£356,900 against sustained jobs, £12,450 against short courses, and £30,000 against construction industry apprenticeships).	Agreed

	Construction of new vehicle crossover for access into the servicing area	Agreed
	Repair any damages to the highway due to construction activities for the development including construction work and the movement of construction vehicles.	Agreed
	Securing disabled blue badge car parking spaces on the adjacent site to the north, and commitment to re-providing these in any redevelopment of that site	Agreed
	Adoption of small portions of land on Nicholson and Chancel Streets as public highway	Agreed
	Parking permit free agreement	Agreed
	Cycle hire membership – non-standard arrangement with obligation for offer to be provided to residents on a request-basis	Agreed
	Submission of:	
	Travel Plan	Agreed
	Construction Logistics Plan	Agreed
	Delivery and Servicing Management Plan and agreement to bond payment	Agreed

	Parking Design Management Plan	Agreed
	Contribution of £70,000 towards cycle hire scheme expansion	Agreed
Trees	None unless unforeseen issues prevent trees from being planted or they die within five years of completion of the development in which case a contribution will be sought - £8,000 per tree.	Agreed
Other	A management and operation strategy for the community space	Agreed
	Post Construction Wind Mitigation Review	Agreed
	'Be Seen' Energy monitoring commitments	Agreed
	Ecological Management Plan	Agreed
Admin fee	2% of total contributions	£64,975

362. In the event that an agreement has not been completed by 28 January 2022, the committee is asked to authorise the director of planning and growth to refuse permission, if appropriate, for the following reason:

363. In the absence of a signed S106 legal agreement there is no mechanism in place to mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to Saved Policy 2.5 Planning Obligations of the Southwark Plan 2007, Strategic Policy 14 Delivery and Implementation of the Core Strategy (2011) Policy DF 1 Planning Obligations of the London Plan (2021) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

Mayoral and borough community infrastructure levy (CIL)

364. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. Southwark's CIL will provide for infrastructure that supports growth in Southwark.

365. In this instance, based on information provided by the applicant, an estimated Mayoral CIL payment of £5.6m and a Southwark CIL payment of £6.3m would be due, totalling 11.9m CIL. Potentially £4.1million of this could be subject to a Social Housing Relief claim for the affordable housing element proposed. This would result in the chargeable amount for this development to be around £7.8million of combined CIL. It should be noted that these figures are an estimate only, and would be calculated in more detail when CIL Additional Information and Assumption of Liability forms are submitted prior to implementation.

Consultation

Community involvement and engagement

366. The developer has completed an extensive programme of pre-application meetings in addition to consultation and engagement with key stakeholders and the wider community. The consultation area contained approximately 500 addresses surrounding the site, with a mix of residential and commercial uses. In addition to consulting with residents, the consultation programme identified the following political consultees:

- Councillor Johnson Situ (Cabinet Member for Growth, Development and Planning);
- Ward Members for Borough and Bankside

367. The following community stakeholders were identified:

-
- Better Bankside
- Residents of the Rochester Estate and Quadrant House
- Youngs and Co.

368. The applicant has set out in their Statement of Community Involvement, the

series of meetings, workshops and events undertaken in order to ensure a fulsome consultation process. This is detailed below:

Event	Date
Meeting with Cllr Johnson Situ and Simon Bevan (then-Head of Planning)	20/06/2019
Meeting with Youngs and Co.	August 2019
Meeting with ward councillors	05/09/2019
Presentation to occupiers of Chancel Street properties	06/07/2020
Letter and leaflet drop to addresses within 150m radius of The site	20/07/2020
On-site public exhibition which included meetings with existing residents of Edward Edward's House, Quadrant House and the Rochester Estate	30/07/2020 01/08/2020

369. As part of its statutory requirements the Local Planning Authority sent letters to surrounding residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. Details of consultation and any re-consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices.

Consultation responses from members of the public and local groups

370. Following neighbour consultation, a total of 70 responses were received from members of the public, the overwhelming majority of which were in support of the application. Reasons for support included:
- provision of an increased amount of affordable housing
 - provision of almshouses for older people
 - quality of design of the residential accommodation in meeting the requirements and needs of older people
 - the provision of the new community garden public space and community hall
 - the sustainability of the proposed building
 - provision of new office space including affordable workspace
 - the architectural approach and general design
 - appropriate height and scale for the area
371. It should be noted that two of the comments in support were submitted onto the council's planning register as 'objections', though the comments themselves are in clear support of the proposal.
372. Three responses objecting to the proposals were received from occupiers of neighbouring properties. Reasons for objecting were:
- Harm to neighbour amenity, including loss of daylight, increased sense of enclosure and noise and disruption from construction period

- Lead-office use inappropriate for the site
- Scale of development inappropriate for site and area
- Change in character of the site and area
- Property values of neighbouring properties will be negatively affected

373. These points are responded to in detail in the main report above, with the exception of impact on property values. While this could be an impact incurred as a result of a proposed development, it is not able to be taken into account as a material planning consideration.
374. One neutral response was received from the Chair of the Quadrant House Residents Association. This requested noise, dust, timings and traffic considerations be taken into account as part of the construction management plan with a view to minimising the impact of the construction period on neighbouring occupiers.

Consultation responses from external and statutory consultees

375. Environment Agency – No objections subject to conditions.
Response – Noted and agreed.
376. Greater London Authority - The principle of the redevelopment of the site for a significant new office, public house, affordable housing and community use is supported. Provision of 100% affordable housing strongly supported. Confirmation of decant strategy for existing residents should be provided. The proposal would result in less than substantial harm to local heritage assets, which is outweighed by the significant benefits of the scheme, and the scale, height and massing is appropriate for the site and the proposal would comprise a high architectural quality. The development would not have an adverse impact on 'River prospect' views.
377. Initial feedback from the GLA requested further work on trip generation and energy and sustainability in order to ensure submitted assessments were robust and in order to increase policy compliance, and these issues were resolved during the application process. Their response also stipulated requirements regarding setting targets, monitoring and financial obligations where targets are missed for the delivery and servicing management plan and travel plan.
378. **Response** Noted – as set out above the applicant provided further information on trip generation and the energy strategy and environmental performance during the course of the application determination period.
379. Historic England – Historic England considered that the proposal would have a moderate level of less-than-substantial harm to local heritage assets, in particular because of the height of the commercial office volume's impact on the east-facing townscape views from the Roupell Street conservation area located to the west of the site. It considered that the proposal departed from local policy in the proposed height. HE encouraged the applicant to consider design solutions to reduce the impact, including through altering the approach to overall height, façade design and top floors of the building, and ensure the assessment of the

impact of the harm caused by the proposal to heritage assets is carefully considered and robustly justified in light of any potential benefits of the scheme.

380. **Response** – Officers note that Historic England do not object to the proposed development and that the impact on views would comprise, under their assessment, a moderate level of less-than-substantial harm. The applicant amended the arrangement and height of set backs with a view to providing a more slender and articulated top element to the commercial office volume. Officers consider that the scheme has been robustly assessed for its heritage impacts in addition to other impacts, including the benefits from the scheme. On balance, per the main report above, the harm is considered to be relatively minor and outweighed by the benefits of the proposal.
381. London Underground – No comment.
Response – Noted.
382. Metropolitan Police – Acceptable subject to appropriate conditions.
Response – Noted.
383. Network Rail - Given the proximity of the proposed development to Network Rail's infrastructure, Network Rail strongly recommended the developer contacts Network Rail's Asset Protection and Optimisation (ASPRO) team prior to works commencing. Network rail also provided a set of requirements for applicant to comply with both during construction and within the completed development with regard to ensuring works or activities do not encroach or inhibit Network Rail's operations and responsibilities.
Response – Noted, the relevant informatives will be added to any consent issued.
384. Thames Water – No objection subject to condition requiring submission and approval of, in consultation with Thames Water, a Development and Infrastructure Phasing Plan and an informative.
Response - Noted
385. Transport for London – Transport for London provided initial comments regarding both the trip generation figures used in the applicant's submitted Transport Assessment and on the design and provision of cycle parking, including the provision of short-stay spaces for the commercial office to be located in the basement level with longstay spaces. TfL considered that the development is unlikely to have a significant adverse residual impact on the operation of the TLRN, assuming that deliveries are managed to ensure the on-street loading bay on Nicholson Street operates within capacity. Bus and London underground infrastructure was considered to have adequate capacity to accommodate the additional trips to be generated by the development. Alongside the council, TfL were of the view that servicing should take place on-site rather than on-street. The scheme would contribute to providing an improved public realm and has been designed in line with Healthy Streets principles, which was supported.
386. TfL requested a contribution towards expanding the Santander Cycle Hire scheme in addition to a contribution towards their Healthy Streets initiative.
387. The high level of development activity along St Thomas Street and more

generally in the London Bridge area will require additional Cycle Hire capacity. As acknowledged in the TA, a contribution towards expansion would be appropriate. Contributions are also sought towards legible London signage and conditions/s106 obligations should secure a Travel Plan, Construction logistics Plan and Delivery Servicing Plan.

388. **Response** – Noted. The applicant provided further information regarding the trip generation figures to TfL's satisfaction, and provided justification for the proposed cycle parking arrangement, also to TfL's satisfaction. Following initial comments, the applicant proposed a revised servicing arrangement to include an on-site loading bay for smaller vehicles. The applicant will provide a contribution to the Santander Cycle Hire scheme and is in discussion with TfL regarding the financial contribution to the Healthy Streets initiative. This will be finalised as part of any Stage II referral process.

Community impact and equalities assessment

389. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
390. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
391. 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

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.

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

393. The principle of the use proposed by the application is acceptable in planning terms as the site is allocated under the NSP. The NSP was itself the subject of a detailed equalities impact assessment. There is nothing in the principle of the redevelopment of the site for the uses proposed in the application that should cause a fundamental inconsistency with the Public Sector Equality Duty (PSED).
394. The site is currently host to almshouses provided at an affordable rate to qualifying elderly people with a local connection to the London Borough of Southwark. The proposal would see these existing 25 almshouse homes demolished and replaced with 62 new self-contained affordable almshouse homes provided to residents on the same basis. In virtue of this, the proposal has the potential to impact older people in Southwark to a greater extent than any other group recognised as a protected characteristic.
395. The development would require the existing residents to be removed from their existing homes in order to permit demolition and site clearance in preparation for construction of the proposal to commence. This has the potential to negatively impact older people in Southwark to a greater extent than any of other groups listed as a protected characteristic above.
396. However, the applicant will be required to submit a decant strategy for approval by the council ensure minimal disruption to these existing residents. It is understood the existing residents will be offered the opportunity to take residents in alternative accommodation within the new build scheme for older people on Southwark Park Road, and that on completion of the proposal, the existing residents will have the right to return to the Blackfriars Road site.
397. This will be confirmed through the approved decant strategy to be secured under the S106 obligations. Taking the care to minimise impact on the existing elderly residents into account, the proposal, by virtue of providing a net increase of more than double the number of affordable almshouse homes on the site than existing, will have a positive impact on the borough.
398. In particular, in virtue of providing almshouses specifically for older people with a connection to Southwark and at the level of affordability proposed, the scheme will impact older people more so than any of the other groups listed under the protected characteristics above. This impact will be overwhelmingly positive, given the affordable housing offer, quality of accommodation, facilities, amenity, design and contribution improved public realm on and around the site. On this basis the proposal is considered to have a positive impact in equalities terms.

Human rights implications

399. 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.
400. This application has the legitimate aim of providing new offices, 62 new almshouses as affordable housing and a caretakers flat, a new public house and

community hall. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive statement

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

Positive and proactive engagement: summary table

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

Conclusion

406. The proposal is in conformity with strategic land use policies set out in the London Plan, the Core Strategy and the draft New Southwark Plan site allocation NSP13. The proposal would provide over 30,000sqm of Grade A office floorspace, generating and contributing a significant number of jobs to the Central Activities Zone. The proposal would comprise a range of uses appropriate for a town centre, including employment, a replacement public house, a community facility, a policy compliant level of affordable work space and self-contained housing.
407. The housing offer would be a substantial contribution to the borough's pipeline of affordable housing and is strongly supported at 100% affordable housing. The terms at which the housing would be let would be more affordable than typical social rent levels, and would be secured to not exceed this in perpetuity. The proposed accommodation in terms of residential design standards and overall provision of communal and amenity facilities will provide an excellent quality of

housing for future residents tailored to meet specific needs of older people.

408. The proposal utilises a successful approach to massing and architectural treatment to minimise the impact of height and scale, and would make a welcome contribution to the Blackfriars Road area in townscape and streetscape terms. The provision of the new open space and public realm is a substantial benefit of the scheme. The proposal would have a less than substantial harm on the identified heritage assets, and would achieve well in excess of the minimum 35% saving on Part L of the 2013 carbon emissions, at 50%.
409. The proposal is considered to be of an appropriate mix of land uses presented a high quality, attractive design which will positively contribute to the Blackfriars Road area and borough. It is for this reason that a grant of planning permission, subject to conditions and completion of a S106 agreement, is recommended.

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received.
Appendix 3	Recommendation (draft decision notice)

AUDIT TRAIL

Lead Officer	<u>Stephen Platts</u> , Director of Planning and Growth
Report Author	Tom Weaver
Version	Final
Dated	26.08.2021
Key Decision	No
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER	

Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		26.08.2021